

# *Qualified Investments*

*A Summary of Investment Test Results*

- ◆ **Contains 2001 CRA examination information**
- ◆ **Taken from publicly available data from all regulatory agencies**
- ◆ **Representing institutions located in the FRBSF's 12<sup>th</sup> District**

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*[www.frbsf.org/community](http://www.frbsf.org/community)*

This report provides a summary of qualified investments based on CRA examinations that began in the calendar year 2001, performed by the four regulatory agencies<sup>1</sup> for institutions located in the Federal Reserve’s Twelfth District. This report includes every 2001 exam whose performance evaluation was available on the Internet as of March 2004. The types of institutions presented in the report include large banks, small banks, thrifts and wholesale and limited purpose institutions.

This report summarizes those findings and contains performance evaluation excerpts that describe the types of investments for which examined banks received CRA consideration. For ease of comparison, financial institutions are sorted by regulator, identified by name and listed in descending order by asset size. In addition, we have recorded each institution’s volume of qualified investments, grants and contributions, investment test rating, overall CRA rating, and Tier 1 Capital information.

Preceding each bullet-point summary is a data table for each financial institution:

Example:

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments/ Grants and Donations	Grants / Donations	Assessment Area/State	Regulator
\$6.2 billion	\$435,226	Satisfactory	High Satisfactory	01/01/99 – 12/31/00	\$3,050,000	\$76,500	San Francisco/ California	OTS

Big Thrift Institution  
ots/25\*

Tier 1 Capital information is included as a data reference when available. Its inclusion is not meant to imply its use as a benchmark for CRA performance. Examiners arrive at an Investment Test rating by considering a host of factors, including performance context factors such as the availability of qualified investment opportunities in the institution’s assessment area.

Tier 1 Capital information for financial institutions regulated by the Federal Reserve Bank of San Francisco, the Federal Deposit Insurance Corporation, and the Office of the Comptroller of the Currency (OCC) is recorded from the Uniform Banking Performance Report, page 11a, under Net Tier 1 Capital. We used data from the quarter ending four-to-six months prior to the examination’s start date, since the Federal Reserve Bank of San Francisco’s compliance examination unit customarily collects pre-examination data on financial institutions the quarter before an examination begins. Similarly, Tier 1 Capital information for institutions regulated by the Office of Thrift Supervision is recorded from the Consolidated Statement of Condition, Schedule SC line SC80, Total Equity Capital for the quarter ending four to six months prior to the exam’s start date. In some instances, the

<sup>1</sup> The four regulatory agencies: Federal Reserve Bank of San Francisco (FRBSF), Federal Deposit Insurance Corporation (FDIC), Office of Thrift Supervision (OTS), and Office of the Comptroller of the Currency (OCC).

OCC allocates Tier 1 Capital of the financial institution among the assessment areas, based on the percentage of deposits in each assessment area. Allocated Tier 1 Capital, if noted in a performance evaluation, is captured in the summary of that institution.

The column labeled “Qualified Investments, Grants and Donations” reports the total amount of qualified investments (e.g. mortgage-backed securities, tax credits) and the total amount of grants and donations reported by the institution. Whenever possible, the amount of qualified grants and donations are also reported separately in the column labeled “Grants and Donations.” Some public evaluations clearly distinguished between the amount of investments and the amount of grants and contributions; other public evaluations aggregated the two into one number. For public evaluations that grouped investments and contributions into one category, “Grants and Donations” was reported as “not identified.” Performance evaluations often rounded qualified investments, grants and donations to the nearest thousand, but these amounts are listed to the nearest dollar whenever possible in this document.

\*Each institution is assigned a code, derived from its regulator’s acronym and an assigned number, in descending order, by asset size, by regulator. This code can be found directly under the “Assets” column, and can be used to reference the data used to prepare this report. **An expanded data summary is included at the end of this document.**

Institutions Regulated by the Office of Thrift Supervision

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$57.5 billion	\$4,267,107	Out-standing	High Satisfactory	04/01/99 – 06/30/01	\$175.1 million	\$1.8 million	California, Florida, Colorado, Texas, Arizona, New Jersey, Kansas, Illinois, Nevada

World Savings Bank  
ots/01

- The institution makes a significant level of qualified community development investments and grants, particularly those not routinely provided by private investors.
- The institution makes occasional use of innovative and/or complex investments.
- The institution also committed to invest an additional \$26.4 million.
- Most of the institution’s investments, approximately \$173.3 million of the total of \$175.1 million, were mortgage-backed securities secured by loans to low- and moderate-income borrowers.
- Qualified contributions included:
  - \$502,404 to United Way.
  - \$172,000 to Habitat for Humanity.
  - \$170,450 to Neighborhood Housing Services.
  - \$120,308 to Christmas-in-April.
  - \$83,720 in in-kind donations of furniture, equipment, and supplies.

Institutions Regulated by the Office of Thrift Supervision

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$6.3 billion	\$445,226	Satisfactory	High Satisfactory	07/01/99 – 12/31/00	\$3,100,000	\$74,930	Los Angeles CMSA, Sacramento CMSA, San Francisco, CMSA, Stockton-Lodi, CMSA, Fresno MSA/California

Western Financial Bank  
ots/02

- The institution made a significant level of community development investments.
- Investments were diverse and responsive to community needs by supporting the formation and on-going success of organizations committed to serving low- and moderate-income neighborhoods.
- Investments were the result of innovative efforts on the part of management.
- The investments were not routinely provided by private investors, totaled over \$3.1 million, and included:
  - Equity investments in community-based organizations dedicated to community development.
  - Qualifying mortgage-backed security purchases.
  - Charitable contributions to housing related organizations.
- Qualifying equity investments for the combined assessment areas for the year 2000 included:
  - \$200,000 to the Clearinghouse CDFI.
  - \$3,000 to the Lenders for Community Development.
  - \$8,128 to the Inland Empire Lender's CDC.
- Other qualifying investments included:
  - \$981,764 in GNMA securities which were collateralized by loans made to low- and moderate-income applications in the assessment areas.
  - \$1.0 million in mortgage-backed securities from Neighborhood Housing Services of America for lands in LMI assessment area tract. Forty percent of the loans are to low-income buyers.
- The institution granted:
  - \$74, 930 to qualifying housing related organizations throughout its assessment areas.

Institutions Regulated by the Office of Thrift Supervision

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$2.98 billion	\$215,997	Satisfactory	Outstanding	10/01/98 – 09/30/00	\$540,000	\$40,000	Orange Co. PMSA, Riverside-San Bernadino PMSA, portions of Los Angeles-Long Beach PMSA/California

PFF Bank & Trust  
ots/03

- Level of investments is excellent, given the institution’s size and resources.
- Made use of an innovative investment vehicle for its largest investment, the Bank Enterprise Award Program, through the U.S. Treasury, which encourages financial institution investment in CDFIs, which is considered an equity investment. This is an unusual investment for a west region thrift institution.
- The institution’s qualified investments were:
  - \$500,000 to Community Investment Corporation, a CDFI in Riverside, California.
- The institution’s grants were:
  - \$21,000 to Neighborhood Partnership of Montclair (California).
  - \$8,000 to House of Ruth, a shelter for battered women and their children.
  - \$4,000 to Community Wellness Partnership, a youth violence prevention program.
  - \$7,000 in aggregate to other qualified charities.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$2.7 billion	\$220,977	Satisfactory	Low Satisfactory	01/10/99 to 12/31/00	\$3,700,000	\$51,000	State of Washington, Seattle-Tacoma-Bremerton CMSA, Bellingham MSA, Richland-Kennewick-Pasco MSA, Spokane MSA, Portland-Salem-Vancouver CMSA, State of Idaho, State of Montana, Missoula MSA, Montana Non-MSA Co./Washington, Idaho, Montana

Sterling Savings Bank  
ots/04

- The bank made an adequate level of qualified investments. While the level of investment is somewhat low relative to the institution’s size, this is mitigated by the investment limitations of its charter and its strong performance under the lending test.
- The institution made qualified investments totaling \$3,595,000, including:
  - \$3,095,000 in two mortgage backed securities collateralized with home loans to low- and moderate-income persons.
  - \$500,000 in Washington State Housing Bonds.
- The institution made 45 grants totaling \$51,000.

Institutions Regulated by the Office of Thrift Supervision

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$1.31 billion	\$99,520	Outstanding	High Satisfactory	01/01/99 – 01/31/01	\$1,400,000	\$252,000	Los Angeles Co., Orange Co., Riverside Co./California

Quaker City Bank  
ots/05

- The institution's qualified investments are:
  - \$1.0 million in a Fannie Mae DUS bond secured by a 152-unit building providing affordable housing for low-income seniors.
  - \$100,000 in a CD in Family Savings Bank, a minority-owned institution.
  - \$99,000 in a CD in Broadway Savings Bank, a minority-owned institution.
- The institution's qualified grants are:
  - \$50,000 to Habitat for Humanity.
  - \$40,000 to Whittier Area Parents Association for the Developmentally Handicapped.
  - \$162,000 to various organizations for a variety of community development purposes.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$1.07 billion	\$90,450	Satisfactory	High Satisfactory	01/01/99 – 12/31/00	\$1,500,000	\$11,995	Santa Rosa PSMA, San Francisco PSMA, San Jose PSMA/California

Luther Burbank Savings  
ots/06

- The institution has a good level of qualified investments and exhibited adequate responsiveness to community credit and economic development needs.
- The institution made qualified investments consisting of:
  - \$500,000 in a Federal National Mortgage Association Delegated Underwriting and Servicing Mortgage-Backed Security (DUS bond). The board had approved a \$1.0 million investment, but the subscription was oversold.
  - \$1.0 million in the California Affordable Housing Fund (2000-2001). Eight financial institutions have made an initial investment of \$10.7 million. The collateral underlying the pools consists of four buildings containing 319 units for very low-income persons. One of the buildings is outside the assessment area, but in the larger regional area that includes it.
- In addition, the institution has a continuing investment of \$463,636 in tax-exempt bond financing facilitated by SAMCO. Consideration was given to this investment because of the importance of long-term investments in community development. The proceeds of the bond provide affordable housing to low- and very-low income persons.
- The institution made \$11,995 in community development grants to:
  - Raphael House, Hospitality House, Women's Initiative for Self-Employment, Ecumenical Association for Housing, Christmas in April, California Community Partnership for the Prevention of Financial Abuse, Fair Housing of Marin, and the Redwood Empire Food Bank.

Institutions Regulated by the Office of Thrift Supervision

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$985 million	\$112,047	Satisfactory	High Satisfactory	01/10/99 – 12/31/00	\$927,000	\$18,890	Eugene-Springfield MSA, Medford-Ashland MSA, Portland-Vancouver MSA, Corvallis MSA/Oregon

Klamath First Federal Savings and Loan Assn  
ots/07

- The institution made a good level of qualified investments and grants.
- The institution made qualified investments consisting of:
  - \$457,000 tax credit investment in a Qualified Zone Academy Bond benefiting the Tule Lake Basin School District. At least 35% of the district's children qualify for free or reduced cost lunches.
  - \$470,000 in the Oregon Farm Worker Housing Tax Credit, benefiting the Klamath County Housing Authority which operates a 25-unit, year-round farm worker housing project.
- In addition, the institution has over \$3.2 million in qualified investments as of December 31, 2000 in the form of low-income housing tax credits, school district bonds, and grants that benefit organizations that focus on education, emergency services, senior housing and youth. The variety and complex nature of many of those investments demonstrate good responsiveness to the credit and community economic development needs of the service areas.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$906 million	\$143,194	Outstanding	Outstanding	01/01/99 – 12/31/00	\$4,000,000	\$2,840	Yakima MSA, Richland-Kennewick-Pasco MSA, Kittitas Co./Washington

Yakima Federal Savings and Loan Assn.  
ots/08

- The institution improved its level of qualified investments. Relative to its size and marketplace, the institution's level of qualifying grants and investments is excellent.
- The institution made qualified investments consisting of:
  - \$3,672,178 in mortgaged-backed security bonds from Advest, Inc., a company that sells Fannie Mae, Freddie Mac and Ginnie Mae securities backed by loans to low- and moderate-income borrowers in low- and moderate-income census tracts.
  - \$250,000 in the Washington Community Reinvestment Association for a tax-exempt housing revenue bond, part of the financing for a 38-unit low-income senior housing project.
  - \$100,000 in a Washington State Housing Finance Commission bond to finance mortgages for low- and moderate-income families.
- Still out standing are \$2.5 million in similar investments made in 1998, including:
  - \$2,039,232 in mortgage-backed security bonds from Advest.
  - \$256,797 in Washington Community Reinvestment Association bonds four multi-unit affordable housing projects.
  - \$100,000 in a Washington State Housing Finance Commission bond to finance mortgages for low- and moderate-income families.
- The institution made qualifying grants totaling \$2,840 to nonprofits in support of affordable housing or community development.

Institutions Regulated by the Office of Thrift Supervision

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$793 million	\$47,396	Satisfactory	Low Satisfactory	01/01/99 – 04/30/01	\$0	\$0	San Diego Co., Los Angeles Co., Orange Co., Riverside Co./California; Collin Co., Dallas Co., Denton Co., Tarrant Co./Texas

La Jolla Bank, FSB  
ots/09

- The institution did not make any qualifying investments or contributions during the review period within its combined assessment areas. The weak investment test performance is offset by its strong lending test performance (high satisfactory) and the somewhat limited opportunities under its charter.
- The institution is essentially an adjustable rate portfolio mortgage lender.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$772 million	\$69,724	Satisfactory	Low Satisfactory	01/01/99 – 12/31/00	\$65,000	\$20,000	Los Angeles Co./California

Standard Federal, FSB  
ots/10

- For an institution of its size and resources, \$65,000 in qualified investments is considered low. In addition, the investments are not considered particularly innovative.
- The institution's qualified investment consisted of \$45,000 in bonds issues by the Community Redevelopment Agency of the City of Los Angeles.
- The institution made donations of approximately \$20,000 to nonprofit organizations benefiting low- and moderate-income individuals.

Institutions Regulated by the Office of Thrift Supervision

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$648 million	\$61,623	Satisfactory	Low Satisfactory	10/01/99 – 12/31/00	\$0	\$9,300	Los Angeles Co./California

First Bank of Beverly Hills, FSB  
ots/11

- The institution made an adequate level of community development investments, although it has not functioned in a leadership role, or used innovative or complex contributions.
- Over the past few years, the institution had participated in the Savings Mortgage Association Company, Inc. and the Clearinghouse CDFI. Though no investments were made during the review period, the institution’s sponsorship continues.
- The institution made community development grants for:
  - \$9,000 to the Water Buffalo Foundation, which supports charities providing community development services in the assessment area.
  - \$300 to the Youth Education Sports Scholarship program which serves the San Fernando Valley area.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$591 million	\$47,087	Satisfactory	Low Satisfactory	07/01/98 – 06/30/01	\$1,023,000	\$23,000	San Francisco CSMA, Los Angeles-Long Beach PMSA/California

Pan American Bank, FSB  
ots/12

- The bank made one investment, \$1,000,000 for a mortgage backed security.
- The institution made 23 grants for \$23,000, including:
  - \$5,000 to Human Investment Project Housing, which creates permanent affordable housing for over 1,000 people each year.
  - \$5,000 to the Samaritan House, a homeless shelter that also provides medical and dental services.
  - \$3,750 to the San Mateo County’s Family Loan Program, which assists low-income families transitioning from welfare to self-sufficiency.
  - \$3,500 to Habitat for Humanity San Francisco.
  - \$3,000 to Lenders for Community Development.

Institutions Regulated by the Office of Thrift Supervision

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$501 million	\$40,274	Satisfactory	High Satisfactory	01/01/00 – 03/31/01	\$1,100,000	\$9,300	Monterey Co., Santa Cruz Co., Santa Clara Co./California

Monterey Bay Bank  
ots/13

- The institution made a significant level of community development investments for an institution of its size.
- The institution continued to make cash and non-cash donations to various community organizations in the assessment area, however, many of these activities did not constitute community development investments, as strictly defined by the statute.
- The institution made qualified investments including:
  - \$1.0 million for a qualified security. Affordable housing in Santa Clara County collateralizes this mortgage-backed security.
  - \$99,000 to purchase a CD from the Community Credit Union, a CDFI in Santa Cruz County.
- The institution made community development grants including:
  - \$15,000 to Cabrillo College for the expansion of its satellite campus in a downtown enterprise zone, part of a \$75,000, five-year commitment.
  - \$2,500 to the Pajaro Valley Shelter Services, the second installment of a \$10,000 commitment.
  - \$400 to the Center for Community Advocacy, an organization devoted to improving housing conditions for farm workers and low-income families.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$501 million	\$33,585	Satisfactory	High Satisfactory	01/01/00 – 03/31/01	\$1,100,000	\$9,300	Monterey Co., Santa Cruz Co., Santa Clara Co./California

Los Padres Bank  
ots/14

- The institution made a significant level of community development investments for an institution of its size.
- The institution continued to make cash and non-cash donations to various community organizations in the assessment area, however, many of these activities did not constitute community development investments, as strictly defined by the statute.
- The institution made qualified investments including:
  - \$1.0 million for a qualified security. Affordable housing in Santa Clara County collateralizes this mortgage-backed security.
  - \$99,000 to purchase a CD from the Community Credit Union, a CDFI in Santa Cruz County.
- The institution made community development grants including:
  - \$15,000 to Cabrillo College for the expansion of its satellite campus in a downtown enterprise zone, part of a \$75,000, five-year commitment.
  - \$2,500 to the Pajaro Valley Shelter Services, the second installment of a \$10,000 commitment.
  - \$400 to the Center for Community Advocacy, an organization devoted to improving housing conditions for farm workers and low-income families.

Institutions Regulated by the Office of Thrift Supervision

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$499 million	\$26,866	Satisfactory	Low Satisfactory	01/01/99 – 12/31/00	\$0	\$0	State of Hawaii

Territorial Savings and Loan Assn.  
ots/15

- The institution did not make any community development investments during the review period. Given the institution’s limited investment authority and its adequate performance under the lending test, the performance under the investment test is rated low satisfactory.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$378 million	\$28,806	Satisfactory	Low Satisfactory	01/01/99 – 03/31/01	\$6,274	\$6,274	Los Angeles Co., Orange Co./California

Universal Bank  
ots/16

- The institution made a low level of community development investments and was never in a leadership position.
- The institution made community development grants that directly or indirectly benefited low- and moderate-income individuals and areas, including:
  - \$5,000 to the Community Development Commission, Office of Small Business, Los Angeles, California to provide assistance to small and start-up businesses.
  - \$1,274 to seven organizations, including non-profits providing food assistance and educational funding to low- and moderate-income individuals.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$334.6 million	\$23,335	Satisfactory	Low Satisfactory	01/01/99 – 03/30/01	\$21,000	\$21,000	Olympia MSA, Mason Co./Washington

Fullerton Community Bank, FSB  
ots/17

- The institution made only \$21,000 in qualifying investments, all donations, during the review period, considered adequate only because of the institution’s strong record of lending.
- The institution’s donations included:
  - \$9,000 to the Southern California Community Business Corporation.
  - \$12,000 in various contributions to qualified organizations, including the Boys and Girls Club.

Institutions Regulated by the Office of Thrift Supervision

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$292 million	\$41,819	Satisfactory	Outstanding	10/01/98 – 09/30/00	\$1,819,500	\$117,000	Olympia MSA, Mason Co./Washington

Olympia Federal Savings and Loan Assn.  
ots/18

- The institution made an excellent level of community development investments. The investments have been innovative and complex in nature.
- The institution made qualified investments including:
  - \$1.6 million for a tax-exempt Washington State Housing Finance Commission bond. The institution made a \$1.6 million loan to Community Youth Services to purchase their main building. The loan was immediately sold to the state, which in turn issued the bond secured by the loan. This provided a tax-exempt rate on the institutions investment, which provided a lower interest rate on the loan. The project was labor and time intensive.
  - \$100,000 bond purchased from the Washington State Housing Finance Commission’s CRA taxable single-family bond program.
  - \$2,500 equity investment in WCRA, an affordable housing lending consortium.
- The institution made community development grants totaling \$117,000 to qualifying community development organizations.

Institutions Regulated by the Office of the Comptroller of the Currency

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$129 billion	\$8,244,000	Outstanding	Outstanding	04/01/98 – 09/30/01	\$307.45 million	Not detailed	States of Arizona, California, Colorado, Idaho, Minnesota, Nevada, Oregon, Utah, Washington

Wells Fargo Bank, NA  
occ/01

- The bank has an excellent level of investments that are highly responsive to the needs of the assessment areas.
- The bank also reported \$55.95 million in unfunded commitments.
- Investment volumes were evaluated based on an allocation of the bank's Tier 1 Capital by the pro-rata share of deposits.
- Qualified investments included:
  - Investments in the National Equity Fund which helped finance qualified CD projects
  - A \$100,000 five-year, zero interest equity investment in an organization that renovates distressed single-family homes in LMI areas.
  - The bank's efforts on a regional level through its \$25 million investment in the California Equity Fund shows additional responsiveness in this innovative and complex investment. The bank helped coordinate the multi-layering of public and private funding and provided construction loans for many of the projects.
  - \$200,000 equity investment in a technical assistance and loan packaging organization.
  - \$75,000 equity investment in a microloan pool
  - \$9 million equity investment in a fund that provides equity to underutilized and blighted industrial and retail sites.
  - \$400,000 equity investment in banking centers in LMI areas.
  - \$5.8 million affordable housing bond.
  - \$1 million equity investment in a housing CDFI.
  - \$5 million equity investment in a venture fund that emphasizes women and minority owned technology businesses and businesses willing to relocate to or expand in historically depressed areas.
  - \$10 million investment in a commercial real estate fund that focuses on revitalizing the poorest communities in the Bay Area.
  - \$4 million investment in a venture fund that provides venture capital, business advice, and critical business resources to businesses in low-income communities.
- Qualified contributions included:
  - \$790,000 to local United Way for programs targeted to LMI individuals
  - \$1.5 million in grants to a charter school serving LMI students.
  - Contributions to LMI schools, homebuyer education, credit counseling, a microenterprise loan fund.

Institutions Regulated by the Office of the Comptroller of the Currency

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$35 billion	\$3,295,955	Satisfactory	Outstanding	04/01/98 – 03/31/01	\$268.8 million	Not detailed	State of California, Seattle MSA, Tacoma MSA, Chelan County (WA), Portland-Vancouver MSA, Eugene-Springfield MSA, Guam, Northern Mariana Islands

Union Bank of California  
occ/02

- The bank has an excellent level of investments that are highly responsive to assessment area needs.
- The bank also reported \$108.6 million in unfunded commitments.
- The bank’s investments helped provide nearly 7,000 units of affordable housing. While these investments were generally not complex or innovative, the bank created a major impact accommodation to its AAs.
- Qualified investments included:
  - An equity investment of \$47 million in a limited partnership dedicated to providing affordable housing for LMI individuals.
  - A \$33 million equity investment in a tax credit limited partnership.
  - Another equity investment of \$30 million in a limited partnership dedicated to providing affordable housing for LMI individuals.
  - A \$7.2 million tax credit investment in an affordable housing complex.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$5.4 billion	\$1,063,518	Satisfactory	Satisfactory	01/01/99 – 12/31/00	\$39,867,877	\$140,177	Las Vegas, North Las Vegas/Nevada

Household Bank (SB), NA  
occ/03

- The institution is a CEBA credit card bank and used a strategic plan. In 1999, the OCC approved a revision to the plan which expanded the types of investments the bank could utilize. The investment types are CRA CDs, philanthropy, and Consumer Credit Counseling Services.
- The institution has demonstrated outstanding CRA performance by substantially meeting the strategic plan goals set forth, however, conduct with regard to discriminatory or other illegal credit practices adversely affected its rating.
- The institution made \$39,867,877 in qualified investments:
  - Investments included federal and state agency single and multifamily affordable housing bonds.
  - Investments in two SBA loan pools.
- The institution made \$140,177 in qualified grants during the assessment period, over the \$114,000 needed for a “satisfactory” rating. In 2000, the institution made \$85,492 in grants, which exceeded the goal for an “outstanding” performance (\$67,000) for that period.
- In addition to the investments noted above, the institution made qualified investment contributions to the Consumer Credit Counseling Services (CCCS) based on a fair share percentage allocation based on the number of accounts collected by the CCCS for the bank. The elevated dollar amount is largely due to the increase in credit card debt and collection of that debt.
  - \$29,717,208 in contributions to CCCS was recorded during the assessment period, exceeding the “outstanding” goal of \$10,000,000 for that period.

Institutions Regulated by the Office of the Comptroller of the Currency

Assets	Tier 1 Capital	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$1.65 billion	\$384,670	Out-standing	High Satisfactory	07/01/98 – 06/30/01	\$16,593,000	Not detailed	Anchorage MSA, 9 rural Alaska counties

First National Bank of Anchorage  
occ/04

- The bank’s investment performance is good based on the number and dollar volume of investments relative to available opportunities, community needs, and positive impact in the assessment area.
- More than 91% of investments helped finance affordable housing, including Low Income Housing Tax Credits and housing development bonds.
- Other investments included the purchase of First Time Homebuyer Mortgage Revenue Bonds.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$1.18 billion	86,378	Satisfac-tory	High Satisfactory	11/02/98 – 4/2/01	\$12,560,000	\$40,000	Monterey County, San Benito County, Santa Cruz County, Santa Clara County

First National Bank of Central California  
occ/05

- Bank has a good level of CD investments, grants, and donations relative to the bank’s Tier 1 capital
- Bank purchased \$7.2 million in mortgage-backed securities.
- Bank invested \$5.2 million in statewide tax credit funds.
- While the investments were not considered innovative or complex, they were considered responsive to credit and community development needs.

Institutions Regulated by the Office of the Comptroller of the Currency

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$1.1 billion	\$80,848	Satisfactory	High Satisfactory	07/01/99 – 09/30/00	\$4,800,000	Not Identified	Los Angeles-Long Beach MSA (full scope), Alameda Co., Orange Co. MSA, San Francisco Co., San Jose Co. (limited scope)/ California

Far East National Bank  
occ/06

- The institution's has a good level of qualified investments and grants, representing 5.06% of its Tier 1 Capital. All investments benefited the assessment area.
- Investments and grants exhibit good responsiveness to the credit and community development needs of the community.
- Qualified investments in affordable housing in the Los Angeles-Long Beach MSA totaled \$4 million or 83 percent of the investment total.
- During the evaluation period, the institution reached its legal limit for additional investments in CDCs.
- Most investments were not innovative or complex, but management took a leadership role in an investment to help revitalize and stabilize local economically depressed communities.
- Investments included:
  - \$10 million in U.S. Agency mortgage-backed securities to help finance mortgages to low- and moderate-income individuals. \$3.2 million was allocated to the Los Angeles-Long Beach MSA.
  - \$3 million committed in a local development fund to develop up to 15 commercial and multifamily projects in low- and moderate-income communities. As of the evaluation date, the institution has paid \$278,825 into the fund.
- Prior period investments include \$1 million in a statewide tax credit fund that invests in affordable housing projects throughout California, \$748,286 of which was allocated to the Los Angeles-Long Beach MSA.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$308 million	\$20,195	Satisfactory	Outstanding	02/01/97 – 06/04/01	\$1,677,000	Not Identified	Phoenix-Mesa MSA/Arizona

Johnson Bank Arizona, NA  
occ/07

- Based on full scope reviews, the bank's performance in the Phoenix-Mesa MSA is excellent; the level is considered high in view of the competition for qualified community development investments and the bank's size relative to its competitors.
- Qualified investments, excluding commitments, equal 8 percent of Tier 1 capital.
- The investments are not innovative, but are highly responsive to a significant need in the assessment area the provision and financing of affordable housing.
- The bank made ten qualified investments including:
  - \$1.0 million in a mortgage loan pool, 12 home mortgages to low- and moderate-income families in the assessment area.
  - \$500,000 in CDs in two credit unions targeting low- and moderate-income individuals and families, which helped fund lending programs.
  - \$100,000 to a pool assisting low- and moderate-income home buyers with down payments, closing costs and home improvements. As of this examination, the bank had funded \$62,512 of this commitment.
- A prior period investment noted in this exam, \$50,000 to a multi-bank CDC.

Institutions Regulated by the Office of the Comptroller of the Currency

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$27.9 million	\$12,280	Satisfactory	N/A	08/01/99 – 10/09/01	\$410,000	\$4,587,000	Maricopa County

Dillard National Bank – Limited Purpose  
occ/08

- The bank demonstrates occasional use of innovative qualified investments.
- Of the bank’s investments, \$1.3 million benefited the assessment area and \$3.7 million benefited areas outside the bank’s assessment area.
- \$552,000 in grants to community development organizations, most of which had a focus on housing.
- \$125,000 industrial revenue bond which supported affordable housing.
- \$100,000 certificate of deposit in a CDFI
- \$85,000 in mortgage-backed securities.
- \$4,000 grant to a daycare center.
- \$367,000 grant to Consumer Credit Counseling Services (CCCS).
- Since the bank’s investments in its assessment area were considered adequate, grants made outside the assessment area were considered. These included \$2.2 million in grants to community development organizations and a \$1.5 million contribution to CCCS.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$2.6 million	\$1,916	Satisfactory	N/A	01/01/97 – 04/30/01	\$15,000	\$15,000	Chinatown, Little Tokyo, Central Los Angeles, Crenshaw, Boyle Heights, Central City, Vernon, Baldwin Hills, Leimert communities of the Los Angeles MSA /California

JBC Bank, NA  
occ/09

- A limited purpose institution. Qualified investments were 0.75% of average Tier I capital. This is considered adequate given the opportunities available given the bank’s charter restrictions and financial capacity.
- The qualified investment in his period was to a local community development organization. The investment breaks down as follows:
  - \$11,000 to provide affordable housing and home buyer education.
  - \$3,000 to provide paint and supplies for home improvement.
  - \$1,000 worth of personal computers as an in-kind donation.
- In the prior period, the bank made a good effort to provide a community development investment. The bank invested in a small business loan pool, which was both innovative and complex because it was the only small business fund of its kind in the assessment area, and because neither the bank nor its parent had expertise in CD investments.
  - A \$50,000 investment was originated in 1995, which as 20 percent of the pool that provided small, flexible loans to existing small businesses that could not get traditional financing.
  - The commitment was terminated in 2000 because the applicant pool was primarily start-up businesses with little or no capital, which did not meet the pool’s eligibility requirements.

Institutions Regulated by the Federal Reserve

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$5.5 billion	\$475,908	Satisfactory	Low Satisfactory	04/05/99 – 04/30/01	\$29,500,000	\$109,000	Northern California, St. Helena (full scope), Orange Co., San Diego Co.(limited scope)/ California

Silicon Valley Bank  
frb/01

- The bank’s level of qualified investment activity decreases slightly from the previous examination, \$35.6 million to \$29.5 million. The level is considered generally adequate, representing 1.5 percent of the total investment portfolio, 6.2 percent of equity capital and 0.5 percent of total assets.
- \$3.5 million is new activity since the prior examination.
- Community contacts in all four assessment areas identified affordable housing and small business loans as primary credit needs. The bank’s investments largely targeted these needs:
  - \$27.2 million for affordable housing.
  - \$2.2 million for small business development.
- The majority of the qualified investments occurred in the Northern California assessment area.
  - \$2.5 million in direct investments and grants, including:
    - \$2.1 million in support of small business growth and development.
    - \$237,000 in support of affordable housing.
    - \$104,000 in support of community development services to low- and moderate-income individuals.
- The only direct qualified investment in the St. Helena assessment area was a \$1.0 million mortgage backed security in support of affordable housing.
- In all four assessment areas, grants totaled \$109,000 to support an array of community development purposes.
  - Grantees included Lenders for Community Development, Silicon Valley Community Ventures, Teach for America Bay Area, and the Salvation Army.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$1.1 billion	\$87,423	Satisfactory	High Satisfactory	10/04/99 – 09/10/01	\$13,300,000	\$225,000	Los Angeles Co.-Orange Co., San Diego Co./California

Hanmi Bank  
frb/02

- Qualified investments and grants are significant, and represent 6.5 percent of the bank’s investment portfolio. Since the last examination, the bank’s qualified investment activity has increased in dollar amount and as a percentage of its investment portfolio.
- The majority of the bank’s offices and lending activity was in the Los Angeles County-Orange County. assessment area, therefore, activity in this area received the most consideration.
- In the Los Angeles County-Orange County assessment area:
  - Fourteen investments ranging from \$200,000 to \$2.9 million were made, primarily in mortgage backed securities.
  - In the Los Angeles County-Orange County assessment area, four grants totaling \$11,000 were made.
  - In the San Diego Co. assessment area, there were no community development investments.

Institutions Regulated by the Federal Reserve

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$796 million	\$57,849	Satisfactory	High Satisfactory	02/03/00 – 12/31/00	\$5.6 million	Not Identified	Imperial Co., Coachella Valley region of Riverside Co., eastern portions of San Diego Co./California

Valley Independent Bank  
frb/03

- Qualified investments and donations represent 3.6 percent of bank’s investment portfolio.
- Since the previous evaluation, the level of qualified investments increased from \$1.8 million to \$5.6 million, demonstrating the bank’s proactive investment strategy.
- In Imperial County, the level of investment activity is adequate. The level is comparatively lower than in the bank’s other assessment areas due to limited investment opportunities, particularly those of a more routine or less complex nature.
  - \$277,000 in qualified investments were made in Imperial County, primarily benefiting local redevelopment organizations, school districts, and youth organizations.
- Carried over from previous years, investments in Imperial County total \$850,000.
- In Riverside County, the level qualified investments is reasonable.
  - \$2.6 million in new investments were made, primarily benefiting school districts, youth programs, and affordable housing projects.
- Carried over from previous years, investments total \$498,000 in Riverside County.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$673 million	\$38,841	Satisfactory	Needs to Improve	04/19/99 – 12/31/00	\$208,725	\$11,058	Sacramento MSA, Nevada Co., Sierra Co., Plumas Co./California

Placer Sierra Bank  
frb/04

- The level of qualified investments represents 1.0 percent of total investment portfolio.
- In the Sacramento MSA, the level of qualified investments is insufficient, totaling \$208,725 since the last exam.
  - \$197,667 for two bonds issued prior to the previous exam.
    - \$90,302 in a bond for a local redevelopment agency to prevent the economic decline of the downtown area and to provide funding for low- and moderate income housing.
    - \$107,365 in a health facilities bond for a hospital targeting low- and moderate-income citizens of El Dorado County.
- Grants in the Sacramento MSA are insufficient.
  - \$8,358 in grants supported initiatives supporting low- and moderate-income children and families, including services for abused children and technical assistance to small businesses.
- Investments in Nevada County, Sierra County, and Plumas County are insufficient.
  - Since the last exam, there were no community development investments.
- Grants in Nevada County, Sierra County, and Plumas County are insufficient.
  - \$2,700 was granted to four non-profit entities which provided educational programs for small businesses, low- and moderate income housing, and healthcare for seniors.

Institutions Regulated by the Federal Reserve

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$542 million	\$45,977	Satisfactory	Low Satisfactory	01/01/00 – 06/30/01	\$2,500,000	\$31,000	Santa Cruz Co./California

Coast Commercial Bank  
frb/05

- Primary investment was a \$2.2 million mortgage-backed security secured by mortgages in low- and moderate-income geographies.
- Bank made a \$300,000 equity investment in a land recycling fund to support the redevelopment of brownfields.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$468 million	\$27,937	Satisfactory	Low Satisfactory	03/31/00 – 06/30/01	\$1,300,000	\$37,825	San Francisco, Oakland, Millbrae, Honolulu MSA /California and Hawaii

Bank of the Orient  
frb/05

- The bank has a generally adequate level of qualified community development investments and grant activity, demonstrating a modest response to the community development initiatives in its assessment areas.
- Investments in the San Francisco assessment area include a:
  - \$200,000 general obligation bond to finance affordable housing and down payment assistance.
- Grants in the San Francisco assessment area total:
  - \$26,825 to organizations providing technical and financial expertise to businesses in low- and moderate-income geographies, job and language training, housing and medical services, and meals to seniors and new immigrants.
  - Two of these grants were to organizations that served the greater San Francisco Bay area, including Oakland and Millbrae.
- In the Oakland assessment area, investments consist of:
  - \$195,000 in two deposits with a minority-owned bank and a community development bank.
  - \$25,000 in an equity investment the community development bank remains the institution's portfolio.
  - \$500,000 in a binding, unfunded commitment to an affordable housing pool. The bank was one of the first institutions to commit to this investment.
- Grants in the Oakland assessment area include:
  - \$4,500 in two donations to organizations providing services to low- and moderate income persons in the greater Bay Area.
- In the Millbrae assessment area, no qualified community development investments or grants were made, which is reasonable considering the lack of opportunities specifically targeted to Millbrae.
- In the Hawaii assessment area, the bank made a qualified investment in the form a a\$1,000 grant. This is reasonable considering the bank's entry into the market, which occurred in 2000.

Institutions Regulated by the Federal Reserve

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$458 million	\$38,808	Satisfactory	Low Satisfactory	01/01/99 – 12/31/00	\$700,128	\$100,128	Santa Clara Co./ California

Heritage Bank of Commerce  
frb/07

- Qualified investments represent 1.9 percent of the total investment portfolio and 1.9 percent of the total equity capital.
- Qualified community development investments in the assessment area consist of:
  - \$600,000 in six investments, demonstrating good responsiveness to two of the areas credit and community development needs, affordable housing and micro-business development.
- Qualified grants in the assessment area:
  - Totaled \$100,128 in 33 grants.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$450 million	\$40,732	Satisfactory	High Satisfactory	01/01/99 – 09/30/00	\$3,176,490	Not Identified	Los Angeles Co.-Orange Co., San Bernadino Co.-Riverside Co. (limited scope)/California

California Center Bank  
frb/08

- The bank's qualified investments and grants have substantially increased from \$482,390 to \$3,176,490, or from 0.6 percent to 4.6 percent of the total investment portfolio.
- The bank's level of qualified investments is satisfactory and primarily supports affordable housing efforts.
- In the Los Angeles County-Orange County area, investments can be broken down as follows:
  - \$2,952,250 towards affordable housing.
  - \$130,990 towards economic development.
  - \$1,750 to community services targeting low- and moderate-income individuals.
- The bank's opened a branch in the San Bernadino County-Riverside County area on 09/01/00, and the exam period ended on 09/30/00. Therefore, a only a limited analysis, and no investment information, of this assessment area was conducted.

Institutions Regulated by the Federal Reserve

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$422 million	\$31,751	Satisfactory	Needs to Improve	08/01/99 – 07/31/01	\$1,450,393	\$5,393	Salt Lake City-Ogden MSA, Box Elder Co.-Cache Co./Utah

Bank of Utah  
frb/09

- The bank’s level of qualified investments and grant activity in both assessment areas needs to improve. The activity is not commensurate with the bank’s capacity or wit the opportunities and needs that exist in its local communities.
- Qualified investments represent 2 percent total investments.
- In the Salt Lake City-Ogden MSA, investments and grants totaled \$1,448,368. This level is insufficient given the bank’s capacity and the area’s opportunities.
  - \$1,220,000 went to the purchase of three affordable housing bonds issued by an independent, public state agency
  - Included in this total is a \$300,000 redevelopment agency bond purchased in 1997 with an outstanding balance of 225,000.
  - Of special mention is a \$392,700 commitment made in July 2001 for a state low-income housing tax credit property.
- Qualified donations and grants in the Salt Lake City-Ogden MSA totaled:
  - \$3,368 to nonprofit organizations that provided services such as job training, assistance to the homeless and family counseling.
- In the Box Elder County-Cache County, no direct investments were made in this relatively new assessment area.
  - Qualified investments that impact this area include the statewide affordable housing bonds, totaling approximately \$1.2 million, purchased in the first quarter of 2000.
- Qualified donations and grants in the Box Elder County-Cache County assessment area total:
  - \$2,025 and includes the in-kind donation of ten computers to a nonprofit organization that provides job training.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Length of Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$298 million	\$26,087	Outstanding	Not Applicable	03/31/99 – 12/31/00	\$50,837	\$0	Riverside-San Bernadino MSA /California

Desert Community Bank  
frb/10

- The bank made a total of \$50,837 in qualified investments during the review period
  - \$45,000 in a community development corporation that provides small business loans to minorities and women in low- and moderate-income areas.
  - \$5,837 in a bond allocated for a lease-to-purchase housing program targeting low- and moderate-income buyers who lack sufficient funds to close the purchase of a home.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$8.2 billion	\$519,461	Outstanding	High Satisfactory	01/01/00 – 06/30/01	\$21,060,000	\$1,090,000	Los Angeles CMSA, San Francisco CMSA, San Diego MSA, Stockton/Lodi MSA, Fresno, Madera, Sacramento, San Joaquin, and part of Kern Co./California

California Bank and Trust  
fdic/01

- Overall, the bank's 27 qualifying debt or equity investments, totaling \$19,970,000 can be broken down as follows:
  - \$7,140,000 in three Low-Income Housing Tax Credits.
  - \$5,625,000 in four investments in FNMA/GNMA mortgage backed securities.
  - \$5,070,000 in nine SBIC/SBDC investments promoting economic development by investing in small businesses.
  - \$1,335,000 in nine financial intermediaries/CDCs.
  - \$500,000 in one state and municipal obligation.
  - \$300,000 in an organization engaging in affordable housing and rehabilitation.
- The bank made 200 grants and donations totaling \$1,090,000, including:
  - \$130,000 to program the bank developed to assist first time, low- and moderate-income homebuyers in California with grants for closing costs and fees.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$2.5 billion	\$186,241	Satisfactory	High Satisfactory	01/01/98 – 10/31/99	\$23,911,000	\$45,000	Los Angeles Co. (full scope); Orange Co., San Francisco Co., Santa Clara Co. (limited scope)/ California

East West Bank  
fdic/02

- Qualified community development investments and grants reflect a good response to credit and community economic development needs, based on the bank's size, resources and availability of such investments.
- In its assessment area, the institution's investments can be broken down as follows:
  - \$19.1 million in five government backed securities.
  - \$3.545 million in 100 low-income housing tax credits.
  - \$1.0 million in a small business CDC.
  - \$196,000 in affordable housing rehabilitation and construction.
  - \$25,000 in financial intermediaries.
  - \$45,000 in nine grants and donations.
- In particular, the bank have investments that include:
  - \$3.4 million in Fannie Mae mortgage backed securities that the bank continues to hold.
  - \$15.7 million in additional Fannie Mae mortgage backed securities to collateralize the construction of multifamily housing projects throughout Los Angeles.
  - \$1.1 million in tax credits that funded affordable housing projects that the bank continues to hold.
  - \$19.4 million in additional, out-of-state affordable housing tax credits, \$2.4 million of which benefited projects in California.
  - \$25,000 equity investment in a CDC in San Gabriel Valley that lends to small businesses.
  - \$195,624 in foregone dividends from the Federal Home Loan Bank of San Francisco redirected to affordable housing.
- Donations include \$15,000 to a nonprofit investment banking organization that provides credit and homeowner education to underserved Los Angeles residents.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$2.4 billion	\$151,766	Satisfactory	High Satisfactory	01/01/99 – 12/31/00	\$40,814,000	\$86,000	State of Nevada, Las Vegas MSA, Reno-Sparks MSA, Nevada NMSA/Nevada

Nevada State Bank  
fdic/03

- Total qualified investment and grants totaled \$40.814 million, reflecting a significant level of investments, the bank occasionally taking a leadership position, particularly with those not routinely provided by private investors.
- Qualified investments, grants, and donations increased 102 percent from the previous evaluation, in line with the bank's growth in total assets and total investment portfolio.
- In the four identified assessment areas, examples of investments include:
  - \$15.8 million in a \$455 million general SBA capitalization pool used to fund SBICs throughout the country.
  - \$9.1 million for the development of economically depressed rural areas located in the Nevada NMSA area.
  - \$6.0 million in a municipal investment in the construction of a rail transportation corridor and related facilities in a moderate-income area in the Reno-Sparks MSA.
  - \$3.0 million for the development of affordable housing throughout Nevada.
  - \$2.7 million in 17 municipal investments for the construction of library in a low- and moderate-income geography in the Las Vegas MSA.
  - \$2.0 million in 16 municipal bounds for a health care facility in a low- and moderate-income geography that provides jobs, services and facilities in the Nevada NMSA region.
  - \$1.5 million in a SBIC formed by the bank and 13 other financial institutions under the Small Business Act of 1958; 80 percent of the SBIC's investments will be made to emerging small businesses in the Western United States. This investment is given less weight due to its current lack of impact in the bank's assessment areas.
- Grants and donations in all assessment areas numbered 59 and totaled \$86,000. No examples were cited in the evaluation.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$2.2 billion	\$187,050	Satisfactory	High Satisfactory	01/01/99 – 12/31/00	\$27,303,000	\$113,000	Portions of Los Angeles Co., portions of Riverside Co. and San Bernadino Co., San Francisco Co. and San Mateo Co, Santa Clara Co., Contra Costa Co., Alameda Co., City of Queens and portions of Manhattan / California and New York

Cathay Bank  
fdic/04

- The bank’s qualified investments increased by 95 percent since the last exam, a significant increase.
- The investments are not innovative or complex, but are particularly responsive to the needs of its assessment areas.
- Qualified investments total \$27,190,000 and can be broken down as:
  - \$18.15 million in four investments in Low Income Housing Tax Credits.
  - \$8.8 million in four investments in government agency issues mortgage backed securities.
  - \$125,000 invested in two financial intermediaries.
  - \$84,000 in two investments in affordable housing rehabilitation and construction.
- Examples of the bank’s qualified investments include:
  - \$18.2 million invested as a limited partner in 11 affordable housing projects in California. The bank continues to hold tax credit investments in each project.
  - \$4.5 million in two Fannie Mae mortgage backed securities.
  - \$1.0 million in a Freddie Mac mortgage backed security.
  - \$3.3 million in two privately held securities backed low- and moderate-income mortgages, purchased in 1998.
  - \$125,000 invested in two small business CDCs.
  - \$84,000 in foregone dividends due from the Federal Home Loan Bank of San Francisco to be redirected to affordable housing.
- Examples of the bank’s grants and donations include \$100,000 to a community resource center that provides financial services and job placement for residents and business in the Chinatown district of Los Angeles.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$1.29 billion	\$101,651	Outstanding	Outstanding	01/01/99 – 09/30/00	\$6,725,617	\$522,833	State of Washington, Seattle; Portland-Vancouver PSMA, State of Hawaii/Washington, Oregon and Hawaii

HomeStreet Bank  
fdic/05

- Excellent level of qualified investments, based on the performance of similarly situated lenders in the state of Washington, the dollar volume of grants (\$522,833 or 4.13 percent) in comparison to the bank’s net income, the percentage of investments (7.45 percent) compared to the overall investment portfolio, and the limited opportunities in the assessment areas.
- In Seattle assessment area, investments totaled \$6,229,784 and included the following.
  - \$5,059,360 in four mortgage backed securities. All the loans in the pools were to low- and moderate-income borrowers in the Seattle MSA.
  - \$820,424, the book value of a low-income, tax-credit apartment in Seattle owned by the bank. Though it does not count as a qualified investment, the examiners noted that the bank provided \$278,081 for building improvements in this evaluation period.
  - \$350,000 in three Washington State Housing Finance Commission Bonds that support affordable housing projects for low- and moderate-income persons.
- In the Seattle assessment area, the bank made 62 grants and donations totaling \$453,362.
  - Most of the grants aided affordable housing groups and benefited organizations where bank personnel volunteer their services and financial expertise, which qualifies under the community development services test.
- In the Portland-Vancouver PSMA, qualifying investments were in the form of 11 grants totaling \$50,307.
  - Most of the grants aided affordable housing groups and benefited organizations where bank personnel volunteer their services and financial expertise, which qualifies under the community development services test.
  - The bank was rated high satisfactory for its investment activity in this assessment area.
- In the state of Hawaii assessment area, the bank made six qualifying grants totaling \$19,164.
  - Most of the grants were to affordable housing groups in the assessment area, including a \$7,500 grant on the island of Maui.
  - The bank was rated low satisfactory for its investment activity in this assessment area.
  - \$11,664 was donated in four grants in the Honolulu assessment area, mostly to affordable housing groups.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$1.7 billion	\$130,656	Satisfactory	High Satisfactory	05/01/99 – 05/30/01	\$6,460,000	\$101,000	Portions of Los Angeles-Riverside-Orange Co. CMSA, Los Angeles Co. MSA, Orange Co. MSA; Santa Clara Co.; Portions of NY-N. NJ- Long Island CMSA, Kings-NY-Queens-Richmond Cos., Middlesex Co.; Montgomery Co / California, New York, New Jersey, Maryland

China Trust Bank  
fdic/06

- Bank made approximately doubled the number and dollar amount of qualified investments from the previous exam, to \$6.5 million.
- In the four assessment areas, investments included:
  - \$4,262,000 in six mortgage backed securities targeted to low- and moderate-income individuals in California and New York.
  - \$1,320,000 in two Low Income Housing Tax Credits that benefit affordable housing projects in Maryland, Virginia, Delaware, Washington and California.
  - \$492,000 in a state and municipal obligation in Northern California to an affordable housing program.
  - \$265,000 in nine investments related to affordable housing rehabilitation and construction. The investment is in the form of a \$700,000 commitment under a collateral trust note agreement to finance affordable housing.
  - \$20,000 invested in a CDFI that benefits low-income residents of Southern California.
- In the four assessment areas, \$101,000 in 20 grants and donations were made, including:
  - \$59,000 in foregone dividends from the Federal Home Loan Bank of San Francisco, which benefits a program that creates affordable housing in California.
  - \$10,000 in grants to the New York branch of a nonprofit that provides support to organizations for the development of affordable housing and community revitalization.
  - \$5,000 in grants to a New York neighborhood housing service that creates and preserves affordable housing.
  - \$5,000 in grants to a Los Angeles women’s homeless center.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$1.7 billion	\$136,363	Satisfactory	Low Satisfactory	06/26/99 – 09/11/01	\$3,269,000	\$371,000	Honolulu Co. MSA, Hawaii Co., Portions of Maui Co./Hawaii

City Bank

fdic/07

- In the three assessment areas, investments included:
  - \$1,221,000 in a mortgage backed security targeted to low- and moderate-income individuals.
  - \$990,000 to then low-income financial organizations.
  - \$557,000 in seven affordable housing rehabilitation and construction investments.
  - \$130,000 in Low-Income Housing Tax Credits.
- In the three assessment areas, \$371,000 in 10 grants and donations were made, including:
  - \$316,000 in a website and newsletter whose purpose is to revitalize the Hawaiian economy through assistance to entrepreneurs.
  - \$20,000 to a public school foundation through funds raised by a golf tournament.
  - \$5,000 to a nonprofit to assist immigrants and refugees through self-sufficiency training.
  - \$5,000 to a nonprofit to help develop a computer learning center in a low-income rental housing project.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$1.2 billion	\$106,622	Satisfactory	Outstanding	01/01/99 – 12/31/00	\$91,038,000	\$120,000	Los Angeles, San Francisco, San Diego/ California

Imperial Capital Bank

fdic/08

- The bank has an excellent level of qualified investments and their efforts have vastly increased over the past two years.
- While not particularly innovative, the Real Estate Investment Trust (REIT) organization is complex and the assets purchased assist in meeting affordable housing needs.
- Even *without* the REIT investment, the bank's investments remain substantial and total 0.44 percent of total assets and 4.3 percent of total investments.
- In all three assessment areas, the bank made four investments for a total of \$90,918,000.
  - \$85,468,000 in 284 loans in a REIT that includes multi-family housing loans. Of these loans, 26 were made in low- and moderate-income census tracts and account for 49 percent of the dollar amount.
  - \$5,397,000 in two Low Income Housing Tax Credit projects.
    - \$4,900,000 in an innovative investment in a project that provides affordable housing projects that qualify for Section 42 Tax Credits.
    - Approximately \$5,000 in a program that supports nine affordable housing and historic tax credit properties.
  - \$55,000 in the stock of a financial intermediary.
  - \$53,000 in an equity investment in two SBICs.
  - \$15,000 in a nonprofit micro-business lender.
- In all assessment areas, the bank made 26 grants and donations totaling \$120,000.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$998 million	\$71,025	Satisfactory	High Satisfactory	01/01/99 – 12/31/00	\$4,023,680	\$147,707	Stockton-Lodi MSA, Modesto MSA/ California

Union Safe Deposit Bank  
fdic/10

- The bank has limited investment opportunities in their assessment areas. Generally, regional or multi-state banks purchase entire offerings. Most of the community development opportunities are in lending, and the bank’s activity reflects this.
- The bank made a total of \$3,875,973 in qualified debt or equity investments.
  - \$2,165,073 in two Fannie Mae CRA bond pools.
  - \$1,000 in a state and municipal obligation.
  - \$710,900 in Low Income Housing Tax Credits.
- The bank made 17 donations totaling \$147,707.
  - Including approximately \$112,500 in foregone dividends from the Federal Home Loan Bank of San Francisco.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$971 million	\$175,480	Satisfactory	Satisfactory	01/01/99 – 12/31/00	\$9,183,777	\$140,177	Salt Lake Co. MSA/ Utah

Advanta Bank Corporation  
fdic/10

- The institution is an industrial loan company, and used a strategic plan.
- The institution made \$9,043,600 in qualified investments during the assessment period, over the \$7,972,909 (0.7 percent of average assets) targeted for a “satisfactory” rating, but short of the \$17,084,805 (1.5 percent of average assets) needed for an “outstanding” rating.
  - Investments included federal and state agency single and multifamily affordable housing bonds.
  - Investments in two SBA loan pools.
- The institution made \$140,177 in qualified grants during the assessment period, over the \$114,000 needed for “satisfactory” rating. In 2000, the institution made \$85,492 in grants, which exceeded the goal for “outstanding” performance (\$67,000) for that period.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$960.1 million	\$96,616	Outstanding	Outstanding	04/14/99 - 08/06/01	\$5,447,642	\$3,520,262	Santa Rosa PMSA/ California

Exchange Bank  
fdic/11

- The bank's level of qualified investments is excellent.
- The bank's largest single investment was for 1,927,380 for a Low Income Housing Investment Tax Credit in a California affordable housing fund sponsored by a major local bank.
- The bank and its foundation made 55 grants totaling \$157,137 for community development purposes.
  - \$5,000 to a foundation at a local college to help fund the construction of a classroom on a college operated farm. Most of the majority of the students benefiting from this grant are low-income.
- Through the Doyle Trust, the bank provided \$3,363,125 in scholarships to low- and moderate-income students at a local junior college. Although educational opportunities was not an identified as a credit need, proving grants to these students provides them with better employment and career earnings potential.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$868 million	\$69,830	Satisfactory	Low Satisfactory	03/22/99 - 11/05/01	\$2,168,000	\$113,000	Douglas-Josephine Cos., Jackson Co, Eugene- Springfield, Salem, Portland /Oregon

Umpqua Bank  
fdic/12

- Though none of the bank's bond issues were particularly innovative or complex, the bank performed a leadership role in the formulation and issuance of the Oregon Housing and Community Services Department Multifamily Housing Revenue Bond.
- The bank made \$2,055,000 in 11 qualified investments, all community development bond issues.
- The bank made grants and donations to 26 organizations totaling \$113,000, including:
  - \$27,700 to a bank founded charity that grants special wishes in the form of food, furniture, clothing, and medical equipment to low- and moderate-income individuals.
  - \$23,700 to a non profit school to for at-risk youth.
  - \$21,400 to a Christian-based organization that assists families with unmet medical needs.
  - \$6,150 to an agency that provides after-school programs.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$865 million	\$63,912	Satisfactory	Low Satisfactory	01/01/99 - 12/31/00	\$2,464,000	\$17,000	Fremont-San Jose, Carmel/California

Fremont Bank  
fdic/13

- The bank's level of qualified investments has increased significantly since the last examination, from \$153,000 to \$2.5 million.
- The investments exhibit good responsiveness to credit and community development needs, but are not particularly innovative.
- The bank made \$2,447,000 in qualified investments.
  - \$2,347,000 in two affordable housing bonds secured by loans to low- and moderate-income borrowers.
  - \$100,000 in a deposit account at CDFI.
- The bank made 21 grants and donations totaling \$17,000. The recipients of these monies were not detailed.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$847 million	\$82,238	Satisfactory	Needs to Improve	01/01/99 - 12/31/00	\$602,000	\$128,000	Portland-Vancouver; Eugene-Springfield; Salem/Oregon and Washington

Centennial Bank  
fdic/14

- Despite increasing its qualified investments since the last evaluation, the bank continues to exhibit poor performance.
- Compared to a similarly situated institution, investments exhibit less than adequate responsiveness to credit and community development needs. The bank rarely uses innovative or complex investments.
- The bank made nine qualified debt or equity investments totaling \$474,000.
  - \$305,000 in four investments in financial intermediaries, including:
    - \$100,000 in a time certificate in a community development bank.
    - \$200,000 in two time certificates in a CDFI.
  - \$91,000 in three economic development investments.
    - \$75,000 as part of a \$500,000 commitment as a limited partner in a fund to provide financing to companies that do not qualify for traditional financing.
    - \$2,500 in seed money to a local development corporation for neighborhood revitalization.
  - \$91,000 in three investments in affordable housing.
    - \$82,000 in foregone dividends from the Federal Home Loan Bank of Seattle to be redirected to affordable housing.
    - \$6,500 to become a member of an affordable housing bank consortium.
    - \$2,500 in matching funds for to provide soft second mortgages to low- and moderate-income persons through a state of Oregon program.
- The bank made 113 grants and donations totaling \$128,000, including:
  - \$10,050 to support a local hospital for elderly care.
  - \$3,010 to an organization that assists the homeless.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$767.3 million	\$78,534	Satisfactory	N/A	11/12/99 - 12/31/01	\$16,042,652	Not Identified	Salt Lake Co./Utah

BMW Bank of North America  
fdic/15

- The bank is an industrial loan company that provides financing to auto buyers and extends credit cards to qualified consumers.
- Although the bank established goals for 1999, these were not given significant weight because their strategic plan was not approved until June 22, 1999 and deposit insurance was not granted until November 12, 1999.
- The bank's strategic plan goal for satisfactory investment performance was that qualified investments to total assets would exceed 1.0% for each year. The goal for outstanding performance was 1.5%.
- There were no qualified investments in 1999.
- Qualified investments in 2000 totaled \$7,155,000, or 1.3% of total assets, including:
  - \$6,667,000 in four federal agency single-family mortgage pools specifically designed for CRA purposes.
  - \$435,000 in two state agency housing bonds.
- Qualified investments in 2001 totaled \$8,887,000, or 1.03% of total assets, including:
  - \$5,093 in additional three federal agency mortgage pools.
  - At the end of 2001, all federal agency mortgage pools were valued at \$8,457,000.
  - At the end of 2001, the value of the state agency housing bonds totaled \$430,000.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$732 million	\$76,754	Outstanding	Outstanding	01/01/99 - 12/31/00	\$7,703,000	Not Identified	Los Angeles Co. (full scope); Orange Co., San Francisco (limited scope)/California

Pacific Union Bank  
fdic/16

- The qualified investments and donations for this assessment period total \$7,703,000, or 1.0 percent of total assets and 5.0 percent of total investments. This represents a 64 percent increase in dollar amount from the last exam.
- While not innovative or complex, the investments are particularly responsive to the needs of the bank's assessment areas. The bank has increased its investments for affordable housing loans, identified as the primary credit need for the assessment areas.
- The bank made 25 investments totaling \$7,703,000, including:
  - \$7,550,000 in six investments in state and municipal bond obligations, including:
    - 2,900,000 in a GNMA mortgage backed security, secured by properties in a low- and moderate-income area.
    - 2,500,000 in three municipal bonds from the San Francisco Redevelopment Financing Authority.
    - 2,100,000 in two municipal bonds from the Los Angeles Community Redevelopment Agency.
  - \$123,000 in seven investments that promote small business and economic development, including:
    - \$100,000 in a renewal of a time certificate of deposit in a community economic development bank in Oakland, California.
  - \$21,000 in seven investments that in organizations that promote community development by assisting low- and moderate-income communities.
  - \$9,000 in five investments in organizations that serve low- and moderate-income housing needs.
- Grants and donations were not identified separately from the investments listed, but include:
  - \$10,000 to support educational enhancement for youth programs in a school located in a low- and moderate-income area. Funds came from new CD established by the bank, 0.10 percent of each deposit was donated to a local community development organization.
  - \$7,845 to various housing organizations that provide affordable mortgages to low- and moderate-income borrowers.
  - \$6,275 to a resource center that provides health care, employment training and counseling to low- and moderate-income individuals.
  - \$5,000 to a Korean youth center.
  - \$2,150 to an organization committed to revitalizing South Central Los Angeles.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$721 million	\$93,230	Satisfactory	Low Satisfactory	01/01/99 – 9/30/00	\$1,076,601	\$33,550	Bellingham MSA; Seattle-Bellevue-Everett MSA; Skagit Co./Washington

Horizon Bank  
fdic/17

- In the Bellingham MSA (Whatcom County), investments included:
  - \$487,321 in a statewide low- and moderate-income mortgage pool that includes Whatcom County.
  - \$318,953 in two housing authority bonds in Whatcom County.
  - \$236,777 in a statewide housing authority bond that includes Whatcom County.
- In the Bellingham MSA (Whatcom County), grants included:
  - \$15,850 to a local chapter of a national organization that provides a variety of services to low- and moderate-income persons.
  - \$6,000 to a nonprofit medical provider.
  - \$2,500 to a nonprofit that provides family support services.
  - \$2,000 to a nonprofit that provides transitional housing.
- In the Seattle-Bellevue-Everett MSA (Snohomish County), investments included:
  - \$487,321 in a statewide low- and moderate-income mortgage pool that includes Snohomish County.
  - \$236,777 in a statewide housing authority bond that includes Snohomish County.
- In the Seattle-Bellevue-Everett MSA (Snohomish County), grants included:
  - \$2,600 to a local chapter of a national organization that provides a variety of services to low- and moderate-income persons.
  - \$1,500 to a nonprofit provider of low-income housing.
- In the Skagit County assessment area, investments included:
  - \$487,321 in a statewide low- and moderate-income mortgage pool that includes Skagit County.
  - \$236,777 in a statewide housing authority bond that includes Skagit County.
- In the Skagit County assessment area, grants included:
  - \$3,100 to a local chapter of a national organization that provides a variety of services to low- and moderate-income persons.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$704 million	\$567,074	Outstanding	High Satisfactory	01/01/99 - 12/31/00	\$4,910,000	\$22,000	Monterey Co., Santa Cruz Co., San Benito Co./California

Community Bank of Central California  
fdic/18

- The bank made four qualified investments totaling \$4,888,000 in their assessment areas, including:
  - \$2,213,000 in two redevelopment bonds issued by the City of Gonzales to redevelop community facilities within a moderate-income neighborhood.
  - \$1,600,000 in a participant share in a city municipal bond issue in Monterey County. This amount remains outstanding as of the examination date. Municipal revenue bonds generally do not receive qualified investment credit, but this bond provided water and sewer system improvements that contributed to the revitalization and stabilization of the city and county.
  - \$1,000,000 in an affordable mortgage revenue bond from a statewide, California housing agency. The agency's primary purpose is to meet the housing needs of low- and moderate-income persons.
- The bank made 16 grants for a total of \$22,000 to various organizations supporting community development initiatives.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$606.7 million	\$33,647	Satisfactory	Low Satisfactory	01/01/99 - 12/31/00	\$49,828	\$24,828	Tulare Co.; Bakersfield; Fresno County; Kings Co./California

Bank of the Sierra  
fdic/19

- The bank’s level of qualified investments reflects an adequate responsiveness to the credit and economic development needs of the assessment areas, given the limited opportunities for such investments.
- According to bank management and community contacts, there have been few qualified investments in the four counties included in the assessment areas, and regional and multi-state institutions tend to purchase the entire offerings.
- The bank maintains a \$25,000 equity investment in a local economic development lending initiative.
- The bank made 11 grants and donations totaling \$24,828, including:
  - \$20,578 in forgone dividends from the Federal Home Loan Bank of San Francisco’s Affordable Housing Program.
  - \$1,000 to a federal and state funded nonprofit medical income for no-income individuals.
  - \$1,000 to a low-income housing nonprofit.
  - \$750 to various organizations focusing on elder abuse prevention, welfare to work initiatives, and prevention programs for at-risk youth in Visalia, California (Fresno County),

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$595 million	\$41,881	Outstanding	Low Satisfactory	01/01/99 - 12/31/00	\$194,451	\$194,451	Los Angeles MSA, Orange Co. MSA; San Diego MSA/California

First Fidelity Investment and Loan  
fdic/20

- The institution does not use innovative or complex investments, however, management continues to research opportunities for qualified investments that are not routinely provided by other investors.
- Total qualified investments equal 0.03 percent of total assets and 0.2 percent of total investments. Though these figures appear marginally adequate compared to its asset size, the institution has limited capacity to make qualified investments because of its asset structure and loan-to-deposit ratio. Loans represent 83 percent of total assets and the loan-to-deposit ratio averages nearly 125 percent.
- The institution received an “outstanding” rating for its lending performance.
- The institution’s qualified investments in its three assessment areas consist of a series of monetary grants and donations and one in-kind donation, totaling \$194,451.
  - \$171,000 in forgone dividends from the Federal Home Loan Bank of San Francisco to help fund the Affordable Housing Program.
  - \$18,000 in 16 donations to nonprofit organizations that provide small business development, financial literacy training, health services, job training and employment services.
  - \$5,000 in approximate value for the in-kind donation of 27 computers and equipment to a high school financial literacy program at a high school serving primarily low- and moderate-income households in San Diego County.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$587.3 million	\$112,291	Satisfactory	Needs to Improve	01/01/99 – 12/31/00	\$0	\$87,000	Snohomish, King and Pierce Counties

CityBank  
fdic/21

- The level of qualified investments is poor.
- Qualifying investments consist entirely of grants totaling \$87,000. This level is well below other large banks of similar size, and several opportunities for qualified investments exist within the MSA.
- Qualifying grants included:
  - A \$10,000 contribution to a loan fund for disabled entrepreneurs.
  - A \$10,000 contribution to an affordable housing organization.
  - A \$4,000 contribution to a community treatment and intervention services provider.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$584 million	\$88,580	Satisfactory	Low Satisfactory	01/01/99 - 12/31/00	\$1,971,000	\$221,000	Clark Co.; Cowlitz Co.; Skamania Co.; Klickitat Co./Washington

First Independent Bank  
fdic/22

- The level of qualified investments demonstrates an adequate response to community credit and economic development needs, but is considered low when compared to the bank's size and financial resources.
- Qualified debt or equity investments are concentrated in revenue bonds that support affordable housing projects consisting of 12 investments totaling \$1,750,000, including:
  - Revenue bonds issued by a state housing finance commission backed by pools of mortgage loans to low- and moderate-income individuals for single-family housing.
  - Revenue bonds issued by a local housing authority, a municipally chartered nonprofit agency involved with low- and moderate-income housing projects.
  - New bond purchases since the last evaluation totaled \$790,000 and were given more weight for this evaluation.
- The bank made 14 donations totaling \$217,000 to organizations that support low- and moderate-income individuals, including:
  - A program that provides legal representation and advice to low-income people.
  - A nonprofit college foundation to provide scholarships.
- The bank also made four donations totaling \$4,000 to organizations that support low- and moderate income housing, including:
  - A local community housing resource center that offers homebuyer education to low- and moderate-income first time homebuyers.
  - A trust fund that benefits homeless and low- and moderate-income children

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$541 million	\$29,116	Satisfactory	Outstanding	02/08/99 - 03/19/01	\$7,894,350	\$164,350	Clark Co.; Cowlitz Co.; Skamania Co.; Klickitat Co./Washington

The Stockmen's Bank  
fdic/23

- The level of qualified investments is particularly strong because the total dollar volume of investments is extremely high given the bank's size and income.
- The affiliated SBIC is an innovative and complex method of promoting economic developing and the bank's foundation grants are response to community development needs.
- The bank formed a venture capital company, certified as an SBIC, and serves as a general partner. The book value of the investment \$2,300,000.
  - Invested venture capital in a small start-up technology company with ten employees and less than \$100,000 in annual gross revenues. The company was not eligible for traditional bank funding and had high capital requirements. The investment allowed the company to operate and resulted in a significant, large investment from a large technology firm.
- The bank made debt investments in low- and moderate-income housing bonds issued by the Snohomish County Housing Authority totaling \$230,000.
- The foundation was capitalized by its financial group with \$3,900,000 in stock from a public offering and \$1,300,000 in cash.
  - Supports youth programs, recreation, education, affordable housing, community facilities and organizations that support low- and moderate-income communities.
- The foundation made 20 grants totaling \$164,350 that supported affordable housing and revitalization of distressed neighborhoods, including:
  - \$75,000 to renovate a playing field in a moderate-income town in Washington.
  - \$15,000 to a community health clinic in Everett, Washington.
  - \$12,250 to three nonprofits that provide affordable housing in Snohomish County.
  - \$6,250 to a local mission to renovate a women and children's shelter.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$540 million	\$80,198	Satisfactory	Outstanding	01/01/99 - 04/30/01	\$15,696,000	\$186,000	Los Angeles Co.; Santa Clara Co./California

EverTrust Bank  
fdic/24

- Qualified investments represent approximately 3.0 percent of total assets, 4.0 percent of total investments, and 25 percent of total equity capital.
- Grants and donations represent approximately 3.0 percent of pre-tax operating income at year end 2000.
- Since the last evaluation, qualified investments and grants have increased by 35 percent and 31 percent respectively. The majority of the increase came from the purchase of three mortgage backed securities.
- The bank's qualified debt or equity investments include:
  - \$14,504,000 in eight mortgage backed securities.
    - \$9,484,000 in five securities the bank continues to hold, all backed by loans to low- and moderate-income borrowers.
    - \$5,020,000 in three securities backed by mortgages to low- and moderate income borrowers in Los Angeles County.
  - \$615,000 in two municipal bond obligations backed by mortgages to low- and moderate income borrowers.
  - \$391,000 to six financial intermediaries.
    - \$300,000 in deposited funds to three CDFIs serving East Los Angeles, South Central Los Angeles and the San Francisco Bay Area.
    - \$50,000 in a CDFI consortium to fulfill the unmet credit needs in Southern California.
    - \$40,000 in a nonprofit CDC in Southern California, a multi-bank corporation created to facilitate economic growth in Los Angeles.
    - \$1,000 investment as a founding member of a nonprofit CDC in the San Francisco Bay Area that offers small business micro-lending, affordable housing loans, community outreach and education.
- Grants and donations to 85 organizations totaled \$186,000, including:
  - \$20,500 to a nonprofit in Los Angeles that provides financial services and counseling to small businesses and residents of South Central Los Angeles.
  - \$19,550 to a nonprofit in Los Angeles that provides affordable housing loans and revitalization services in Los Angeles County.
  - \$10,000 to a nonprofit in San Jose that provides housing assistance, education and job services.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$540 million	\$62,680	Satisfactory	Outstanding	01/01/99 - 04/30/01	\$15,696,000	\$186,000	Los Angeles Co.; Santa Clara Co./California

Dai-Ichi Kangyo Bank of California  
fdic/25

- Qualified investments represent approximately 3.0 percent of total assets, 4.0 percent of total investments, and 25 percent of total equity capital.
- Grants and donations represent approximately 3.0 percent of pre-tax operating income at year end 2000.
- Since the last evaluation, qualified investments and grants have increased by 35 percent and 31 percent respectively. The majority of the increase came from the purchase of three mortgage backed securities.
- The bank's qualified debt or equity investments include:
  - \$14,504,000 in eight mortgage backed securities.
    - \$9,484,000 in five securities the bank continues to hold, all backed by loans to low- and moderate-income borrowers.
    - \$5,020,000 in three securities backed by mortgages to low- and moderate income borrowers in Los Angeles County.
  - \$615,000 in two municipal bond obligations backed by mortgages to low- and moderate income borrowers.
  - \$391,000 to six financial intermediaries.
    - \$300,000 in deposited funds to three CDFIs serving East Los Angeles, South Central Los Angeles and the San Francisco Bay Area.
    - \$50,000 in a CDFI consortium to fulfill the unmet credit needs in Southern California.
    - \$40,000 in a nonprofit CDC in Southern California, a multi-bank corporation created to facilitate economic growth in Los Angeles.
    - \$1,000 investment as a founding member of a nonprofit CDC in the San Francisco Bay Area that offers small business micro-lending, affordable housing loans, community outreach and education.
- Grants and donations to 85 organizations totaled \$186,000, including:
  - \$20,500 to a nonprofit in Los Angeles that provides financial services and counseling to small businesses and residents of South Central Los Angeles.
  - \$19,550 to a nonprofit in Los Angeles that provides affordable housing loans and revitalization services in Los Angeles County.
  - \$10,000 to a nonprofit in San Jose that provides housing assistance, education and job services.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
452 million	\$31,036	Satisfactory	Low Satisfactory	08/23/99 - 08/06/01	\$442,174	\$42,174	Deshutes Co., Crook Co, Marion Co./Oregon

Bank of the Cascades  
fdic/26

- The bank became a large bank effective January 1, 2000.
- Competition for qualified debt and equity investments from larger banks is strong, as such, opportunities for the bank to acquire such investments are limited.
- The bank's qualified debt or equity investments include:
  - \$300,000 in a regional housing investment mutual fund.
  - \$100,000 in regional housing authority revenue bond.
- Grants and donations to 27 organizations totaled \$42,174, including:
  - \$10,400 to a nonprofit serving the social, health, and educational needs of low- and moderate-income children.
  - \$7,000 to a medical center to fund outreach to lower-income seniors and pregnant women.
  - \$7,000 in three donations to a nonprofit housing agency to fund the construction of affordable housing units.
  - \$5,000 to fund educational field trips to children of low-income families.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$402 million	\$58,515	Satisfactory	Low Satisfactory	01/01/99 - 12/31/00	\$1,507,750	\$27,600	King Co./Washington

First Savings Bank of Renton  
fdic/27

- The bank provides an adequate level of qualified investments and grants, though rarely in a leadership position.
- Qualified investments include seven municipal and state securities issued by housing authorities totaling \$1,507,750.
- Qualified grants total \$27,600.
  - \$25,000 to repair the residences of low- and moderate-income persons, which was matched by a local municipality.
  - \$2,600 to provide transitional housing for homeless families with children.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$386.1 million	\$59,397	Satisfactory	Low Satisfactory	04/27/99 – 7/11/01	\$3,687,599	\$8,270	Bingham, Bonneville, Butte, Clark, Custer, Fremont, Jefferson, Madison, Power, and Teton Counties, ID

The Bank of Commerce  
fdic/28

- The bank has an adequate level of qualified community development investments reflecting the fact that few opportunities for qualified investments exist in the area.
- Bonds issued by the state housing association and held in the bank’s portfolio received the most weight in the investment test. The bonds are backed by reduced-rate residential real estate mortgages to low- and moderate-income Idaho homebuyers.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$357.9 million	\$29,612	Satisfactory	Low Satisfactory	01/01/99 - 06/30/01	\$75,000	\$50,600	San Mateo Co./California

Borel Bank and Trust Company  
fdic/29

- The bank was evaluated under first time large bank procedures. The bank was determined to be a large bank as of 12/31/99.
- The bank has made an adequate level of qualified investments given the short time it has been a large bank.
- Qualified investments consist of one \$25,000 equity investment in an economic development corporation. The bank has taken a leadership position with this organization by providing financial expertise to its executive committee.
- Qualified grants totaled nearly \$50,000 and include:
  - \$15,200 to a community foundation.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$324 million	\$29,269	Satisfactory	Low Satisfactory	01/01/99 - 12/31/00	\$311,627	\$0	Olympic Metropolitan MSA; Tacoma Metropolitan MSA; Lewis Co., Grays Harbor Co./Washington

First Community Bank of Washington  
fdic/30

- The bank provides an adequate level of qualified investments, though rarely in a leadership position.
- Given that this is the bank’s first evaluation using the investment test, consideration is given that the bank is new to this arena and currently gaining expertise in obtaining and monitoring qualified investments.
- For the Olympia MSA (Thurston County), there were no qualified investments, however the bank’s performance is adequate overall because this type of investment is a new area for the bank, and there is strong competition for opportunities in this assessment area.
- For the Tacoma Metropolitan MSA (Pierce County), the high volume of lending in this assessment area, 92 percent average net loan-to-deposit ratio, limits the resources available to make qualified investments.
  - Qualified investments total \$311,627 and consist of:
    - \$191,278 in a limited partnership to finance rehabilitation of low-income housing rental property.
    - \$104,500 in a low-income apartment complex and daycare facility.
    - \$15,849 in a limited partnership to rehabilitate 42 units in a low- and moderate-income housing project.
- For the Lewis County and Grays Harbor County assessment area, there were no qualified investments, however the bank’s performance is adequate overall because this type of investment is a new area for the bank, and there is strong competition for opportunities in this assessment area.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$282 million	\$22,433	Satisfactory	High Satisfactory	08/24/98 - 01/22/01	\$103,370	\$19,000	Western portion of Riverside Co./ California

The Bank of Hemet  
fdic/31

- The bank’s level of qualified investments and grants is satisfactory and represent 0.4 percent of total assets.
- The bank made one qualified investment worth \$84,000 in an equity loan pool for a local community development corporation that provides innovative micro loans to small businesses for women and minorities in Riverside and San Bernadino Counties.
- The bank made five donations totaling \$19,000, including:
  - \$7,000 to a local school district for a program to help feed children from low-income families.
  - \$5,000 worth of space rental as a in-kind donation to a consumer credit counseling agency that assists low-income individuals.

Institutions Regulated by the Federal Deposit Insurance Corporation

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$113 million	\$14,475	Out-standing	Not applicable (small bank)	08/24/98 - 01/22/01	\$1,804,000	\$4,000	Washoe Co./Nevada

First Independent Bank of Nevada  
fdic/32

- The bank's investment record enhances credit availability within the assessment area.
- The bank made qualified investments worth \$1,800,000 in state housing agency tax-exempt municipal bonds that represent approximately 1.6 percent of total assets.
- The bank purchased these bonds because they realized they could not effectively or profitably compete in the home loan mortgage market.
- The bank made donations to almost every nonprofit, charitable, school and religious organization within the Reno/Sparks area. \$4,000 of those donations were qualified donations for community development, including one to a nonprofit group advocating for equal access to housing in northern Nevada.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Length of Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$56.7 million	\$7,008	Satisfactory	Not Applicable	01/01/99 - 12/31/00	\$14,000	\$14,000	Washoe Co./Nevada

Heritage Bank of Nevada  
fdic/33

- Qualifying investments were limited to donations totaling \$14,000, however, these donations directly enhance the needs of some of Reno's most economically disadvantaged.
  - \$4,150 to a nonprofit that assists young and unmarried pregnant women in Nevada, part of a \$6,000 commitment.
  - \$2,250 to a nonprofit specializing in at-risk youth in northern Nevada.
  - \$2,000 to an organization that helps feed the needy. A member of the bank's management is president of the board of directors.
  - \$2,000 to sponsor seminars and provide materials on technical assistance for small business owners. These seminars lasted four to five hours and were presented every three weeks.

Assets	Tier 1 Capital (000)	Overall Rating	Investment Test Rating	Length of Review Period	Qualified Investments, Grants and Donations	Grants and Donations	Assessment Area/State
\$49.9 million	\$4,249	Satisfactory	Substantial Non-compliance	08/06/99 - 08/03/01	\$0	\$0	Clark Co./Nevada

Desert Community Bank  
fdic/34

- Part of a three-tier holding company who's top tier is over \$1,000,000,000, therefore examined under the large bank test.
- No qualifying investments, grants or donations were noted at this evaluation.

<u>Code</u>	<u>Name</u>	<u>Headquarters City</u>	<u>State</u>	<u>Start of Exam Date</u>	<u>Review Period in Years</u>	<u>Asset Size (\$000)</u>	<u>Tier 1 Capital Date</u>	<u>Tier 1 Capital (\$000)*</u>	<u>Over-all</u>	<u>Lending</u>	<u>Investment</u>	<u>Service</u>	<u>Total QIs (\$000)</u>	<u>Ave. QI per year (000)**</u>	<u>QI/Assets</u>
ots/01	World Savings Bank	Oakland	CA	12/01/01	2.25	\$ 57,500,000	06/30/01	\$ 4,267,107	O	O	HS	O	\$ 33,142	\$14,730	0.058%
ots/02	Western Financial Bank	Irvine	CA	02/26/01	1.42	\$ 6,630,000	09/30/00	\$ 445,226	S	HS	HS	HS	\$ 3,100	\$2,188	0.047%
ots/03	PFF Bank & Trust	Pomona	CA	01/29/01	2.00	\$ 2,980,000	09/30/00	\$ 215,997	S	LS	O	HS	\$ 540	\$270	0.018%
ots/04	Sterling Savings Bank	Spokane	WA	03/01/01	1.17	\$ 2,700,000	09/30/00	\$ 220,977	S	HS	LS	O	\$ 3,700	\$3,162	0.137%
ots/05	Quaker City Bank	Whitter	CA	06/04/01	2.25	\$ 1,310,000	12/31/00	\$ 99,520	O	O	HS	O	\$ 1,400	\$622	0.107%
ots/06	Luther Burbank Savings	Santa Rosa	CA	03/26/01	2.00	\$ 1,070,000	09/30/00	\$ 90,450	S	HS	HS	HS	\$ 1,500	\$750	0.140%
ots/07	Klamath First Federal Savings and Loan Assn.	Klamath Falls	OR	04/30/01	1.17	\$ 985,000	12/31/00	\$ 112,047	S	LS	HS	LS	\$ 927	\$795	0.094%
ots/08	Yakima Federal Savings and Loan Assn.	Yakima	WA	02/26/01	2.00	\$ 906,400	09/30/00	\$ 143,194	O	HS	O	O	\$ 4,000	\$2,000	0.441%
ots/09	La Jolla Bank, FSB	Rancho Santa Fe	CA	04/02/01	2.33	\$ 793,000	09/30/00	\$ 47,396	S	HS	LS	LS	\$ -	\$0	0.000%
ots/10	Standard Bank, FSB	Monterey Park	CA	04/30/01	2.00	\$ 772,400	12/31/00	\$ 69,724	S	HS	LS	HS	\$ 65	\$33	0.008%
ots/11	First Bank of Beverly Hills, FSB	Calabasas	CA	03/26/01	2.00	\$ 647,800	09/30/00	\$ 61,623	S	LS	LS	LS	\$ 9	\$5	0.001%
ots/12	Pan American Bank, FSB	Burlingame	CA	10/30/01	3.00	\$ 591,000	06/30/01	\$ 47,087	S	O	LS	LS	\$ 1,023	\$341	0.173%
ots/13	Monterey Bay Bank	Watsonville	CA	07/02/01	1.25	\$ 500,800	12/31/00	\$ 40,274	S	HS	HS	HS	\$ 1,100	\$880	0.220%
ots/14	Los Padres Bank	Solvang	CA	07/02/01	2.25	\$ 500,700	12/31/00	\$ 33,585	S	HS	HS	HS	\$ 786	\$350	0.157%
ots/15	Territorial Savings and Loan Assn.	Honolulu	HI	01/29/01	2.00	\$ 498,800	09/30/00	\$ 26,866	S	LS	LS	HS	\$ -	\$0	0.000%
ots/16	Universal Bank	West Covina	CA	06/04/01	2.25	\$ 378,100	12/31/00	\$ 26,806	S	HS	LS	HS	\$ 6	\$3	0.002%
ots/17	Fullerton Community Bank, FSB	Fullerton	CA	07/02/01	2.25	\$ 334,600	03/31/01	\$ 23,335	S	HS	LS	HS	\$ 21	\$9	0.006%
ots/18	Olympia Federal Savings and Loan Assn.	Olympia	WA	01/29/01	2.00	\$ 291,700	09/30/00	\$ 41,819	S	HS	O	HS	\$ 1,820	\$910	0.624%
occ/01	Wells Fargo Bank, NA	San Francisco	CA	10/01/01	3.33	\$ 129,000,000	06/30/01	\$ 8,244,000	O	O	O	O	\$ 307,450	\$92,327	0.238%
occ/02	Union Bank of California	San Francisco	CA	03/31/01	3.25	\$ 35,000,000	09/30/00	\$ 3,295,955	S	HS	O	HS	\$ 190,412	\$58,588	0.544%
occ/03	Household Bank (SB), NA	Las Vegas	NV	04/30/01	3.00	\$ 5,400,000	12/30/00	\$ 1,063,518	S	strategic plan			\$ 39,868	\$13,289	0.738%
occ/04	First National Bank of Anchorage	Anchorage	AK	09/24/01	3.00	\$ 1,650,000	03/31/01	\$ 384,670	O	O	HS	O	\$ 16,593	\$5,531	1.006%
occ/05	First National Bank of Central California	Salinas	CA	04/02/01	2.42	\$ 1,180,000	12/31/00	\$ 86,378	S	LS	HS	HS	\$ 6,895	\$2,849	0.584%
occ/06	Far East National Bank	Los Angeles***	CA	01/08/01	1.17	\$ 1,100,000	06/30/00	\$ 80,848	S	LS	HS	HS	\$ 4,800	\$4,115	0.436%
occ/07	Johnson Bank Arizona, NA	Phoenix	AZ	06/04/01	4.33	\$ 308,000	12/31/00	\$ 20,195	S	HS	O	HS	\$ 1,700	\$392	0.552%
occ/08	Dillard National Bank	Gilbert	NV	10/19/01	4.25	\$ 27,900	06/30/01	\$ 12,280	S	limited purpose			\$ 4,997	\$1,176	17.910%
occ/09	JBC Bank, NA	Los Angeles	CA	04/30/01	4.33	\$ 2,600	12/31/00	\$ 1,916	S	limited purpose			\$ 15	\$3	0.577%
frb/01	Silicon Valley Bank	Santa Clara	CA	04/30/01	2.00	\$ 5,500,000	12/31/00	\$ 475,908	S	LS	LS	HS	\$ 29,500	\$14,750	0.536%
frb/02	Hanmi Bank	Los Angeles	CA	09/10/01	1.92	\$ 1,100,000	03/31/01	\$ 87,423	S	HS	HS	LS	\$ 13,300	\$6,939	1.209%
frb/03	Valley Independent Bank	El Centro	CA	02/26/01	0.83	\$ 796,000	09/30/00	\$ 57,849	S	HS	HS	LS	\$ 5,600	\$6,720	0.704%
frb/04	Placer Sierra Bank	Auburn	CA	04/02/01	1.58	\$ 673,000	12/31/00	\$ 38,841	S	LS	NI	HS	\$ 209	\$132	0.031%
frb/05	Coast Commercial Bank	Santa Cruz	CA	11/26/01	1.50	\$ 542,000	06/30/00	\$ 45,977	S	HS	LS	O	\$ 2,500	\$1,667	0.461%
frb/06	Bank of the Orient	San Francisco	CA	10/15/01	1.25	\$ 468,000	06/30/00	\$ 27,937	S	HS	LS	LS	\$ 1,338	\$1,070	0.286%
frb/07	Heritage Bank of Commerce	San Jose	CA	04/23/01	2.00	\$ 458,000	12/31/00	\$ 38,808	S	LS	LS	HS	\$ 700	\$350	0.153%
frb/08	California Center Bank	Los Angeles	CA	02/12/01	1.75	\$ 450,000	09/30/00	\$ 40,732	S	HS	HS	LS	\$ 3,176	\$1,815	0.706%
frb/09	Bank of Utah	Odgen	UT	07/16/01	2.00	\$ 422,000	03/31/01	\$ 31,751	S	HS	NI	HS	\$ 1,450	\$725	0.344%
frb/10	Desert Community Bank	Victorville	CA	05/21/01	1.50	\$ 298,000	12/31/00	\$ 26,087	O	small bank			\$ 51	\$34	0.017%

<u>Code</u>	<u>Name</u>	<u>Headquarters City</u>	<u>State</u>	<u>Start of Exam Date</u>	<u>Review Period in Years</u>	<u>Asset Size (\$000)</u>	<u>Tier 1 Capital Date</u>	<u>Tier 1 Capital (\$000)*</u>	<u>Over-all</u>	<u>Lending</u>	<u>Investment</u>	<u>Service</u>	<u>Total QIs (\$000)</u>	<u>Ave. QI per year (000)**</u>	<u>QI/Assets</u>
fdic/01	California Bank and Trust	San Diego	CA	09/17/01	1.50	\$ 8,204,000	03/31/01	\$ 519,461	O	O	HS	HS	\$ 21,060	\$14,040	0.257%
fdic/02	East West Bank	San Marino	CA	05/29/01	2.00	\$ 2,500,000	12/31/00	\$ 186,241	S	HS	HS	HS	\$ 2,400	\$1,200	0.096%
fdic/03	Nevada State Bank	Las Vegas	NV	05/21/01	2.00	\$ 2,400,000	12/31/00	\$ 151,766	S	HS	HS	O	\$ 4,081	\$2,041	0.170%
fdic/04	Cathay Bank	Los Angeles	CA	01/22/01	2.00	\$ 2,200,000	09/30/00	\$ 187,050	S	HS	HS	HS	\$ 2,730	\$1,365	0.124%
fdic/05	HomeStreet Bank	Seattle	WA	01/02/01	1.75	\$ 1,290,000	06/30/00	\$ 101,651	O	O	O	HS	\$ 6,726	\$3,843	0.521%
fdic/06	Chinatrust Bank	Torrance	CA	05/29/01	2.08	\$ 1,700,000	12/31/00	\$ 130,656	S	HS	HS	HS	\$ 6,500	\$3,120	0.382%
fdic/07	City Bank	Honolulu	HI	09/11/01	2.17	\$ 1,700,000	03/31/01	\$ 136,363	S	HS	LS	HS	\$ 20,525	\$9,459	1.207%
fdic/08	Imperial Capital Bank	La Jolla	CA	03/05/01	2.00	\$ 1,200,000	09/30/00	\$ 106,622	S	LS	O	LS	\$ 91,038	\$45,519	7.587%
fdic/09	Union Safe Deposit Bank	Stockton	CA	04/17/01	2.00	\$ 997,500	12/31/00	\$ 71,025	S	HS	HS	HS	\$ 4,024	\$2,012	0.403%
fdic/10	Advanta Bank Corp.	Draper	UT	03/12/01	2.00	\$ 971,000	09/30/00	\$ 175,480	S	strategic plan			\$ 9,184	\$4,592	0.946%
fdic/11	Exchange Bank	Santa Rosa	CA	08/06/01	2.33	\$ 960,600	06/30/01	\$ 96,616	O	O	O	O	\$ 5,448	\$2,335	0.567%
fdic/12	Umpqua Bank	Roseburg	OR	11/05/01	2.67	\$ 868,121	06/30/01	\$ 69,830	S	LS	LS	HS	\$ 2,168	\$812	0.250%
fdic/13	Fremont Bank	Fremont	CA	05/29/01	2.00	\$ 865,000	12/31/00	\$ 63,912	S	LS	LS	HS	\$ 2,500	\$1,250	0.289%
fdic/14	Centennial Bank	Portland	OR	04/10/01	2.00	\$ 847,000	12/31/00	\$ 82,238	S	HS	NI	HS	\$ 602	\$301	0.071%
fdic/15	BMW Bank of North America	Salt Lake City	UT	12/27/01	2.17	\$ 767,282	09/30/00	\$ 78,534	S	strategic plan			\$ 16	\$7	0.002%
fdic/16	Pacific Union Bank	Los Angeles	CA	04/23/01	2.00	\$ 732,000	12/31/00	\$ 76,754	O	O	O	HS	\$ 7,700	\$3,850	1.052%
fdic/17	Horizon Bank	Bellingham	WA	08/28/01	1.67	\$ 721,126	03/31/01	\$ 93,230	S	LS	LS	LS	\$ 1,077	\$646	0.149%
fdic/18	Community Bank of Central California	Salinas	CA	04/30/01	2.00	\$ 704,000	12/31/00	\$ 57,074	O	O	HS	O	\$ 4,090	\$2,045	0.581%
fdic/19	Bank of the Sierra	Porterville	CA	06/04/01	2.00	\$ 606,700	12/31/00	\$ 33,647	S	LS	LS	HS	\$ 50	\$25	0.008%
fdic/20	First Fidelity Investment and Loan	Tustin	CA	04/16/01	2.00	\$ 595,000	12/31/00	\$ 41,881	S	O	LS	LS	\$ 194	\$97	0.033%
fdic/21	CityBank	Lynnwood	WA	08/02/01	2.50	\$ 587,294	03/31/01	\$ 112,291	S	S	NI	LS	\$ 87	\$35	0.015%
fdic/22	First Independent Bank	Vancouver	WA	09/18/01	1.75	\$ 584,200	03/31/01	\$ 88,580	S	LS	LS	O	\$ 1,971	\$1,126	0.337%
fdic/23	The Stockmen's Bank	Kingman	AZ	07/23/01	1.92	\$ 554,600	03/31/01	\$ 29,116	S	LS	LS	HS	\$ 2,104	\$1,096	0.379%
fdic/24	EverTrust Bank	Everett	WA	03/19/01	2.00	\$ 541,252	09/30/00	\$ 80,198	S	LS	O	HS	\$ 7,894	\$3,947	1.459%
fdic/25	Dai-Ichi Kangyo Bank of California	Los Angeles	CA	04/30/01	2.33	\$ 538,991	12/31/00	\$ 62,680	S	LS	O	HS	\$ 15,696	\$6,728	2.912%
fdic/26	Bank of the Cascades	Bend	OR	03/26/01	2.00	\$ 452,471	09/30/00	\$ 31,036	S	HS	LS	HS	\$ 442	\$221	0.098%
fdic/27	First Savings Bank of Renton	Renton	WA	01/08/01	2.00	\$ 402,227	06/30/00	\$ 58,515	S	LS	LS	LS	\$ 1,508	\$754	0.375%
fdic/28	The Bank of Commerce	Idaho Falls	ID	07/11/01	2.50	\$ 386,108	03/31/01	\$ 59,397	S	HS	LS	NI	\$ 3,694	\$1,478	0.957%
fdic/29	Borel Bank and Trust	San Mateo	CA	07/09/01	2.50	\$ 357,900	03/31/01	\$ 29,612	S	LS	LS	LS	\$ 75	\$30	0.021%
fdic/30	First Community Bank of Washington	Lacey	WA	03/19/01	2.00	\$ 323,619	09/30/00	\$ 27,269	S	HS	LS	LS	\$ 312	\$156	0.096%
fdic/31	The Bank of Hemet	Riverside	CA	01/22/01	2.42	\$ 282,000	09/30/00	\$ 22,433	S	HS	HS	HS	\$ 104	\$43	0.037%
fdic/32	First Independent Bank of Nevada	Reno	NV	12/29/01	1.75	\$ 113,000	06/30/01	\$ 14,475	O	small bank			\$ 1,804	\$1,031	1.596%
fdic/33	Heritage Bank of Nevada	Reno	NV	04/09/01	2.00	\$ 56,700	12/31/00	\$ 7,008	S	small bank			\$ 14	\$7	0.025%
fdic/34	Desert Community Bank	Las Vegas	NV	08/20/01	2.00	\$ 49,910	03/31/01	\$ 4,249	S	HS	SN	HS	\$ -	\$0	0.000%

\*Tier 1 Capital reported from UPBR (FDIC, FRB, and OCC) under Net Tier 1 Capital from and TFR Schedule SC (OTS) under total equity capital for quarter ending 4-6 months prior to exam start date.

\*\*Annualized QI is the total qualified investments divided by the number of years in the review period. \*\*\*QI for LA MSA only.