

PUBLIC DISCLOSURE

October 3, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Asian Pacific National Bank Charter Number: 23006

333 West Valley Boulevard San Gabriel, CA 91776

Office of the Comptroller of the Currency

1551 North Tustin Avenue Suite 1050 Santa Ana, CA 92705

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Satisfactory.

The lending test is rated: **Satisfactory**

The major factors that support this rating include:

The Lending Test rating is based on performance in the bank's single assessment area (AA).

- Asian Pacific National Bank's (APNB) loan-to-deposit ratio is reasonable when compared to similar institutions operating in the same general region and given significant competitive factors.
- APNB originated a majority of its loans inside its AA.
- The geographic distribution of commercial lending in the AA is excellent.
- The distribution of loans to businesses of different sizes is excellent.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's loan-to-deposit ratio (LTD) is reasonable.

APNB's average quarterly LTD over the evaluation period was 49.2 percent. The bank's ratio ranged from a high of 55.9 percent to a low of 44.8 percent during the period. The average LTD of three comparable institutions operating in the same geographic region was 69.2 percent, with a high-average ratio of 95.9 percent and a low-average ratio of 40.9 percent during the evaluation period. The bank operates in a competitive environment and holds only 0.01 percent of the deposit market share in the Los Angeles MSA. APNB is the only bank within the MSA with \$100 million or less in total deposits (inside and outside the market). There are over 15 banks within a one-mile radius of the bank's main branch. The bank does not actively purchase participations and primarily offers small business loans.

Lending in Assessment Area

A majority of the bank's loans are inside its AA.

APNB originated 65 percent of its total loans inside their AA during the evaluation period, based on a representative sample of business loans. This analysis is performed at the bank, rather than the AA, level.

Lending Inside and Outside of the Assessment Area											
	Number of Loans					Dollar A					
Loan Category	Insi	de	Outside		Total	Insid	Inside		Outside		
	#	%	#	%	#	\$	%	\$	%	\$(000s)	
Business	13	65	7	35	20	6,510	55	5,300	45	11,810	
Source: Evaluation Period: 1/1/2019-12/31/2021, Bank Data											

Description of Institution

Asian Pacific National Bank (APNB or bank) is a full-service community bank headquartered in San Gabriel, California. APNB is a single state institution with \$57.6 million in total assets as of December 31, 2021. The bank opened in August 1990 as an industrial thrift and loan association and converted to a national bank charter effective December 1995. There have been no mergers or acquisitions impacting the bank during the current evaluation period. APNB received a "Satisfactory" rating at the last examination dated June 15, 2018. There were no legal, financial, or other factors impeding the bank's ability to help meet the credits needs in its AA during the evaluation period.

APNB's rating area is in California. The AA is the communities of the San Gabriel Valley. The valley is a region in southern California stretching from Pasadena to Pomona to the foothills of the San Gabriel Mountains. The valley encompasses 30 cities and several unincorporated communities/census-designated places.

The bank operates a main office and one full-service branch. The main office is located in San Gabriel, CA. The branch is located in Rowland Heights, CA. There are no ATMs. APNB offers a range of deposit products, including personal and business accounts. The bank's primary lending focus is small business loans secured by real estate. As of December 31, 2021, the bank's net loans represented 38.1 percent of total assets. The loan portfolio is comprised entirely of real estate loans. Real estate loans include investor-owned residential real estate loans. The bank reports no farmland or loans to individuals.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period included an assessment of loan originations from January 1, 2019, through December 31, 2021. The review was limited to a sample of commercial-purpose loans, which were centered in real-estate secured transactions. The bank does not originate consumer mortgage loans. The residential real estate loans are investor-owned residential real estate properties used as rentals. These loans were included in the commercial sample population. APNB does not originate farmland loans. APNB offers vehicle loans, but no vehicle loans were originated during the evaluation period.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of the AAs within that state were selected for a full-scope review. For purposes of this evaluation, APNB's delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single AA. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is the same as the state rating because the bank operates in only one state.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of California

CRA rating for the State of California: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The loan-to-deposit ratio is reasonable.
- APNB originated a majority of its loans inside its AA.
- The geographic distribution of commercial lending in the AA is excellent.
- The distribution of loans to businesses of different sizes is excellent.
- The bank has no CRA-related complaints.

Description of Institution's Operations in California

APNB's primary focus is meeting the banking needs of the business community of the San Gabriel Valley. APNB offers personal and business deposit products and business loans. Personal loans are limited to auto loans. Business loans are centered in commercial real estate loans. The bank has two banking locations and no ATMs. There were no branch openings or closings during the evaluation period. Lending strategies and product offerings are consistent throughout the AA. There were no mergers or acquisitions impacting the bank during the evaluation period.

Competition is high. As of June 30, 2021, there were 99 deposit taking institutions in Los Angeles County. Within a one-mile radius of APNB there are over 15 different banks. APNB holds 0.01 percent of the deposit market share. APNB is the only bank in the county with less than \$100 million in total deposits.

Community Contact

Examiners utilized an interview conducted with an organization that provides small business consulting in the San Gabriel Valley. The contact stated that the San Gabriel Valley area is prospering. Job availability is plentiful; however, the challenge is a lack of affordable housing. There are plenty of opportunities for participation by local area banks for small business loans.

San Gabriel Valley AA

Table A – Dem	ographic Ir	nformatio	n of the Ass	essment Ar	ea						
Assessment Area: 2019-2021 San Gabriel Valley AA											
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #					
Geographies (Census Tracts)	429	1.2	19.3	38.9	39.9	0.7					
Population by Geography	1,965,981	0.9	19.5	39.7	39.5	0.3					
Housing Units by Geography	624,045	0.9	17.9	37.0	44.2	0.0					
Owner-Occupied Units by Geography	346,804	0.3	11.3	35.4	52.9	0.0					
Occupied Rental Units by Geography	241,645	1.7	27.2	39.5	31.6	0.0					
Vacant Units by Geography	35,596	1.0	18.7	34.8	45.3	0.1					
Businesses by Geography	197,359	0.8	17.4	33.1	48.5	0.3					
Farms by Geography	1,892	0.7	13.2	35.8	50.2	0.1					
Family Distribution by Income Level	444,753	19.7	15.8	17.6	46.9	0.0					
Household Distribution by Income Level	588,449	21.2	14.6	16.3	47.9	0.0					
Median Family Income MSA - 31084 Los Angeles-Long Beach- Glendale, CA		\$62,703	Median Ho	ısing Value		\$494,609					
			Median Gro	ss Rent		\$1,327					
			Families Be	low Poverty	y Level	10.5%					

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

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

Scope of Evaluation in California

The bank has one AA in California that is subject to a full-scope review. The AA includes contiguous census tracts in the San Gabriel Valley region of the Los Angeles-Long Beach-Glendale MSA, which are combined for analysis purposes.

Lending Test

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the San Gabriel Valley AA is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the State.

Small Loans to Businesses

Refer to Table Q in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

There are limited low-income census tracts in the San Gabriel AA. Based on a sample of loans, there were no bank originated loans in low-income census tracts. The distribution of commercial loans in moderate-income census tracts exceeds both the aggregate comparator and the percentage of businesses in moderate-income census tracts based on a sample of loans. This is excellent performance when considering the limited number of low-income census tracts and the bank's overall lending inside the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to businesses of different sizes, given the product lines offered by the bank.

Small Loans to Businesses

Refer to Table R in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of loans to small businesses in the AA is excellent. The bank's percentage of loans to small businesses is below the percentage of businesses in the AA, but significantly exceeds the peer aggregate lending performance for reporting institutions. The conclusion gives additional weight to the bank's performance compared to peer given overall strong lending competition within the AA.

Responses to Complaints

APNB did not receive any CRA-related complaints during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

Time Period Reviewed:	01/01/2019 through 12/31/2021								
Bank Products Reviewed:	Small business loans								
Affiliate(s)	Affiliate Relationship	Products Reviewed							
N/A									
List of Assessment Areas and Type	of Examination								
Rating and Assessment Areas	Type of Exam	Other Information							
California									
San Gabriel Valley AA	Full-Scope	Cities and designated census tracts of San Gabriel Valley							

Appendix B: Summary of State Ratings

RATINGS: Asian Pacific National Bank							
Overall Bank:	Lending Test Rating						
Asian Pacific National Bank	Satisfactory						
State:							
California	Satisfactory						

Appendix C: Definitions and Common Abbreviations

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

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

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

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

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

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

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

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

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the "bank" include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

- **Table O.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- **Table P.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- **Table Q.** Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.
- Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

- **Table S.** Assessment Area Distribution of Loans to Farms by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- **Table U.** Assessment Area Distribution of Consumer Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- **Table V.** Assessment Area Distribution of Consumer Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table Q	Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 201													2019						
	Total Loans to Small Businesses Low-Income Tracts			Low-Income Tracts Ma					Moderat	e-Incon	ne Tracts	Middle-	Income	Tracts	Upper-l	Income	Tracts	Not Availa	ble-Inc	ome Tracts
Assessment Area:	#	\$	% of Total		% Businesses	% Bank Loans	Aggregate													
2019- 2021 San Gabriel Valley AA	20	11,377	100	70,665	0.7	0	0.9	16.9	40	17.3	33.3	35	34.7	48.8	25	46.9	0.3	0	0.2	
Total	20	11,377		70,665	0.7	0	0.9	16.9	40	17.3	33.3	35	34.7	48.8	25	46.9	0.3	0	0.2	

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by	2019
Gross Annual Revenues	

	To	tal Loans to	Small B	usinesses	Businesse	s with Rev 1MM	venues <=	Businesse Revenues >		Businesses with Revenues Not Available	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2019-2021 San Gabriel Valley AA	20	11,377	100	70,665	89.1	80	55.3	4.7	10	6.2	10
Total	20	11377	100	70,665	89.1	80	55.3	4.7	10	6.2	10

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%