



SMALL BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

PUBLIC DISCLOSURE

April 04, 2007

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**United Americas Bank, National Association
Charter Number 23781**

**3789 Roswell Road
Atlanta, GA 30342**

**Comptroller of the Currency
Georgia Field Office
3 Ravinia Drive Suite 550
Atlanta, GA 30346**

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, nor should it 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.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The major factors supporting the institution's rating include:

- The loan-to-deposit ratio exceeds standards for satisfactory performance and averaged 129 percent for the evaluation period.
- A majority of residential real estate loans and commercial loans were made within the CRA assessment area. Approximately 65 percent of loans reviewed by number were extended within the assessment area.
- The geographic distribution of residential real estate and commercial loans demonstrates satisfactory performance, with a very strong penetration of residential real estate loans in moderate-income census tracts.
- Lending to borrowers of different incomes and business of different sizes exceeds standards for satisfactory performance. Performance is very strong for home purchase lending and commercial lending.

DESCRIPTION OF INSTITUTION

United Americas Bank, N. A. (UAB) is a wholly-owned subsidiary of United Americas Bankshares, Inc., a one-bank holding company located in Atlanta, Georgia. The holding company does not have any other subsidiaries or affiliates. Bank assets were \$176 million as of December 31, 2006.

UAB is a full-service bank located in Atlanta, Fulton County, Georgia. A variety of products and services are offered through its three locations, and UAB has one automated teller machine located at its branch on Chamblee Tucker Road. UAB's primary focus is small business and residential mortgage lending. The bank strives to reach the Hispanic population in its community, including providing services in Spanish and English, and employing bilingual staff. One branch was opened in Smyrna during 2004. As of December 31, 2005, residential real estate loans comprised 53 percent of the loan portfolio, and commercial and commercial real estate loans represented 29 percent of the loan portfolio.

No financial conditions, legal constraints, or other factors impede UAB's ability to meet the credit needs of its assessment area. UAB received a "Satisfactory" rating during the last CRA review dated September 9, 2002.

DESCRIPTION OF ATLANTA

UAB's assessment area (AA) meets the technical requirements of the Act and does not arbitrarily exclude low- or moderate-income census tracts. The AA consists of Cobb, Dekalb, Fulton, Gwinnett, and Cherokee counties. All of these counties are part of the Atlanta-Sandy Springs-Marietta Metropolitan Statistical Area (Atlanta MSA). According to the 2000 United States Census, the population of this AA is approximately 2.8 million.

The Atlanta MSA is a 28-county area surrounding the city of Atlanta with a population of approximately 4.2 million people. Greater Atlanta is internationally recognized as the transportation, communication, industrial, and cultural center of the Southeastern United States. The Atlanta MSA has a strong economy. Due to its location and extensive transportation network, Atlanta developed into a major distribution center for the Southeast. Distribution and associated industrial activities are gradually transferring to other urban centers in the South while Atlanta is evolving as a major provider of technological and financial support services. The Atlanta MSA has a diverse industrial base that includes manufacturing, transportation, distribution, retailing, wholesaling, finance, government, research, education, medicine, and technical support. Ninety percent of the Fortune 500 companies maintain regional offices in the Atlanta area. In addition, 98 of the nation's top industrial firms maintain some type of operational facility in the greater Atlanta area.

The local business community includes national and international corporate giants such as Coca-Cola, Delta Airlines, AT&T, Kimberly Clarke, Siemens Energy & Automation, CibaVision, UPS, Herman Miller, Lucent Technologies, and American Honda. Competition for financial products and services is keen, and includes non-financial institutions in addition to large multi-national banks, local community banks, savings banks, and credit unions.

As part of our examination, we obtained information from community leaders regarding local economic conditions and community credit needs. Based on information reviewed, primary credit related needs in the community are loans for affordable housing, consumer credit counseling, and loans for small businesses.

The following table highlights the demographic composition of the bank’s assessment area:

Demographic and Economic Characteristics of Atlanta MSA Assessment Area	
Population	
Total Population	2,819,973
Number of Families	696,671
Number of Households	1,050,376
Geographies	
Number of Census Tracts	463
% Low-Income Census Tracts	15%
% Moderate-Income Census Tracts	22%
% Middle-Income Census Tracts	31%
% Upper-Income Census Tracts	32%
Median Family Income (MFI)	
2000 MFI for AA	66,999
2005 HUD-Adjusted MFI	69,300
Economic Indicators	
Unemployment Rate	3
2000 Median Housing Value	\$163,105
% Households Below Poverty Level	9%

Source: 2000 Census data and HUD updated income data.

CONCLUSIONS ABOUT PERFORMANCE CRITERIA

Lending performance was assessed based on the bank’s primary loan products consisting of commercial and residential real estate lending. A sample of commercial loans was reviewed and all home purchase and refinance loans reported on the 2004 and 2005 Home Mortgage Disclosure Act Loan Application Register were included in this analysis. We did not review home improvement loans because the bank only made one home improvement loan that was reported during this time frame.

The bank’s lending activity reflects good performance. Lending in the AA and the geographic distribution of loans reflect satisfactory performance. The loan-to-deposit ratio and distribution of loans to borrowers of different income levels and businesses of different sizes is excellent.

Loan-to-Deposit Ratio

The loan-to-deposit ratio performance is excellent. UAB achieved an average loan-to-deposit ratio of 129 percent for the 13 quarters since the previous CRA evaluation. This compares favorably to six similar banks in the Atlanta area that had an average ratio of 86 percent for the same time period with ratios ranging from 74 percent to 101 percent.

Lending in Assessment Area

A majority of loans are made within the AA for all product types reviewed, and this performance meets the standard for satisfactory performance.

Table 1 - Lending in Atlanta MSA Assessment Area										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Purchase	191	63	111	37	302	24,279	65	13,360	35	37,639
Home Refinance	13	76	4	24	17	3,079	88	432	12	3,511
Commercial	24	77	7	23	31	7,194	85	1,259	15	8,453
Totals	228	65	122	35	350	34,552	70	15,051	30	49,603

Source: data reported under HMDA, sample of loans.

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

Lending to borrowers of different incomes and businesses of different sizes exceeds the standard for satisfactory performance. The penetration of loans to small businesses is especially strong. Home purchase loans demonstrate strong penetrations to both low- and moderate-income borrowers.

Residential real estate loans exhibit strong performance for lending to both low- and moderate-income borrowers. Income information was not available for a large portion of the home refinance loans, so conclusions are more heavily based on home purchase lending.

Table 2 - Borrower Distribution of Residential Real Estate Loans in Atlanta MSA Assessment Area								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	19	25	17	63	21	8	43	2
Home Refinance	19	15	17	31	21	8	43	8

Source: data reported under HMDA; U.S. Census data. Borrower income information was not available for 2% of home purchase loans and 38% of home refinance loans.

Lending to businesses of different sizes is excellent. The penetration of loans to businesses less than \$1 million exceeds the percentage of small businesses in the AA.

Table 2A - Borrower Distribution of Loans to Businesses in Atlanta MSA Assessment Area				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	61	5	34	100%
% of Bank Loans in AA by #	71	21	8	100%
% of Bank Loans in AA by \$	92	7	1	100%

Source: Loan sample; Dunn and Bradstreet data.

Geographic Distribution of Loans

The geographic distribution of loans meets standards for satisfactory performance.

The overall distribution of residential real estate loans is good, but the penetration to moderate-income census tracts is very strong. Only a small percentage of owner-occupied housing is located in low-income census tracts, so the absence of loans in these tracts is indicative of the lack of lending opportunities therein.

Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	3	0	13	24	37	55	47	21
Home Refinance	3	0	13	15	37	62	47	23

Source: data reported under HMDA; U.S. Census data.

The geographic distribution of commercial loans is reasonable. No loans were made in low-income census tracts, and the penetration of loans in the moderate-income census tracts is near the percentage of AA businesses located in the moderate-income census tracts.

Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Commercial	6	0	16	12	33	42	45	46

Source: loan sample; D & B data.

Responses to Complaints

United Americas did not receive any CRA related complaints during the evaluation period. This has a neutral impact on the overall CRA rating.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of illegal discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.