



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **Public Disclosure**

January 3, 2005

### **Community Reinvestment Act Performance Evaluation**

**Northern Trust Bank of Florida, N.A.  
Charter Number: 17487**

**700 Brickell Avenue  
Miami, FL 33131**

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

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## Overall CRA Rating

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

The following table indicates the performance level of **Northern Trust Bank of Florida, N. A.** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Northern Trust Bank of Florida, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Lending activity that reflects good responsiveness to the credit needs of the assessment areas (AAs).
- Good geographic distribution of loans, good distribution of loans among borrowers of different income levels, and excellent Community Development (CD) lending in the full-scope AAs.
- Use of flexible lending practices in the AAs that has a positive impact on the Lending Test rating.
- Good level of qualified investments that are responsive to credit and community development needs of the AAs.
- Adequate accessibility of service delivery systems to geographies and individuals of different income levels in the AAs.
- High level of community development services provided in leadership positions.

## Definitions and Common Abbreviations

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

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

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

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

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

**Community Development (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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

**Geography:** A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

**Home Mortgage Loans:** such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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

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

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

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

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

**Metropolitan Area (MA):** Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

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

## Description of Institution

Northern Trust Bank of Florida, N.A. (NTBF) is a midsize, intrastate bank headquartered in Miami, Florida, and is a subsidiary of Northern Trust Corporation (NTC). NTC is a \$42 billion multi-bank holding company located in Chicago, Illinois, with \$2.4 trillion in trust assets and subsidiaries in 16 states and eight countries.

NTBF's business strategy focuses primarily on trust and private banking services. The bank's approach is not to compete on the basis of the number or array of banking products, but to compete on the basis of comprehensive relationships and quality of service. The bank's customer base is primarily comprised of trust customers, and banking business is developed through cross selling to and referrals from existing customers. Loan product offerings include mortgage loans for one-to-four family and multi-family residences, home equity lines of credit, commercial loans and lines of credit, and consumer loans. Deposit product offerings consist of various interest-bearing and noninterest-bearing accounts for personal and business use.

As of September 30, 2004, the bank had total assets of \$4.7 billion, with \$3.7 billion in deposits and \$399 million in Tier 1 capital. Trust assets under administration total almost \$24 billion. The bank's net loans equate to \$4.1 billion, with a net loans-to-assets ratio of 88 percent and a net loans-to-deposits ratio of 110 percent. The loan portfolio is comprised of real estate loans (70 percent), commercial and industrial loans (13 percent), financial institution loans (5 percent), loans to individuals (5 percent), and other loans (7 percent). Real estate loans consist of one-to-four family residential loans (78 percent), commercial real estate loans (16 percent), construction and development loans (4 percent), and multi-family residential loans (2 percent).

The bank delivers trust and banking services through 27 branch offices, which include two limited services offices, as well as five automated teller machines (ATMs) within the state of Florida. The bank's market encompasses 11 counties, which comprise its nine AAs. Branches are located in Broward, Collier, Hillsborough, Indian River, Lee, Manatee, Martin, Miami-Dade, Palm Beach, Pinellas, and Sarasota counties. With the exception of Indian River County, the bank's AAs represent metropolitan statistical areas. Within its combined AAs, NTBF's deposit market share is 1.9 percent.

NTBF's approach to community reinvestment is similar to its overall business strategy. The bank builds and maintains relationships with local community organizations and leaders to help meet the credit and community development needs of its AAs. These relationships are based on the bank's same high quality service standards. Most of the bank's affordable mortgage loan business is generated by referrals from partnerships with these organizations. Other community reinvestment activities, such as community development investments and services, are also manifested from these relationships.

There are no legal, financial, or other impediments that would prevent the bank from meeting the credit needs of its AAs. While the bank receives intense competition from nationwide and regional banks, mortgage companies, and credit card lenders, it is capable of meeting the needs of its AAs in a manner consistent with its resources and business strategy.

NTBF's was rated "Satisfactory" at its last CRA evaluation dated August 20, 2001. The last evaluation reflected the bank's lending performance from January 1, 1998 through December 31, 2000, community development lending, investment and retail service performance from January 1, 1998 through August 20, 2001, and community development service performance from January 1, 1998 through December 31, 2000.



## Scope of the Evaluation

### Evaluation Period/Products Evaluated

With the exception of CD loans, the evaluation period for the Lending Test is January 1, 2001 through December 31, 2003. For CD loans, the Investment Test, and the Retail Banking portion of the Service Test, the evaluation period is August 20, 2001 through December 31, 2004. The evaluation period for the CD portion of the Service Test is January 1, 2001 through December 31, 2004.

Census 2000 changed the boundaries and income levels of many existing geographies, deleted some geographies, and created some new geographies. These changes were effective January 1, 2003. The evaluation period included loans made in 2001 and 2002 as well as loans made in 2003; therefore two separate analyses were completed. The tables in the appendix to this evaluation will reflect the bank's performance during the January 1, 2001 through December 31, 2002 period using 1990 Census Data and the January 1, 2003 through December 31, 2003 period using 2000 Census Data. The results of these analyses were combined to obtain an overall rating.

For the Lending Test, we evaluated NTBF's originations and purchases of home mortgage loans, small loans to businesses, and CD loans. The bank originated or purchased no small loans to farms during the evaluation period and elected not to collect optional data on consumer loans to be considered in this evaluation. Therefore, tables 7, 12, and 13 are not included. As part of the Investment Test, we considered qualified investments allocated to NTBF from its holding company.

### Data Integrity

We assessed NTBF's processes and internal controls for collecting, reporting, and verifying the accuracy of data on home mortgage loans, small loans to businesses, and CD loans, and for identifying qualified investments and CD services. We found the bank's processes and controls to be adequate and its data reliable.

### Selection of Areas for Full-Scope Review

NTBF has nine AAs in Florida. We selected the Miami-Dade County and Sarasota/Manatee Counties AAs for full-scope reviews. These AAs represent the bank's major markets and account for approximately 53 percent of its deposit and 39 percent of its lending activity over the evaluation period. The remaining seven AAs, Broward County, Collier County, Hillsborough/Pinellas Counties, Indian River County, Lee County, Martin County, and Palm Beach County received limited scope reviews. The ratings are based primarily on conclusions reached in the evaluation of NTBF's performance in the two full-scope AAs. Refer to Appendix A for additional information regarding the AAs receiving full-scope and limited-scope reviews.

## **Ratings**

The bank's overall rating is based primarily on those areas that received full-scope reviews.

When determining conclusions for each AA under the Lending Test, we weighted home mortgage loans more heavily than small loans to businesses. Of the home mortgage products, we weighted home purchase loans more heavily than home improvement loans or home refinance loans. This weighting is reflective of NTBF's loan volume for each product type over the evaluation period and the identified critical need for affordable housing.

NTBF's overall ratings under each test are the consolidation of conclusions reached for each full-scope AA. When consolidating AA conclusions into overall ratings, we gave slightly more weight to the Miami-Dade County AA than to the Sarasota/Manatee Counties AAs. This weighting is based on the significance of the AAs to the bank. In addition, we placed more weight on the January 1, 2001 to December 31, 2002 period since it represented a larger segment of the evaluation period.

## **Other**

We made two community contacts during the evaluation. One contact was made in the Miami-Dade County AA and one in the Sarasota/Manatee Counties AA. Both contacts were affordable housing organizations. In both AAs, the community contacts indicated the primary credit need is lending for affordable housing. The need for affordable housing is significant due to the rising land and construction costs that have resulted in prices beyond the reach of many low- and moderate-income residents in the AAs. We considered the need for affordable housing in our evaluation of NTBF's performance under the Lending, Investment, and Service Tests. Refer to the Market Profiles in Appendix B for more information.

## **Fair Lending Review**

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

## Conclusions with Respect to Performance Tests

### LENDING TEST

#### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Miami-Dade County and Sarasota/Manatee Counties AAs is good.

#### Lending Activity

The bank's lending activity reflects good responsiveness to the credit needs of its AAs. The lending activity in the Miami-Dade County AA is good and the Sarasota/Manatee Counties AAs is excellent. Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity. To provide perspective regarding the relative levels of lending volume in each AA, we also compared the bank's deposit market rank and market share to its market rank and market share for each loan product. Because of the large number of lenders compared to banks in each AA (refer to Market Profiles in Appendix B), we based our analysis on the bank's percentile rankings in the loan and deposit markets rather than the actual values of market share and market rank.

*Miami-Dade County AA* – NTBF's lending activity reflects good responsiveness to credit needs in the Miami-Dade County AA.

For the evaluation period January 1, 2001 to December 31, 2002, the bank's market share percentile ranking for home purchase loans, refinance loans, and small loans to businesses is near to, and for home improvement loans is somewhat below, its percentile ranking for deposit market share. FDIC deposit market share data as of June 30, 2002 show that the bank ranks at the 87<sup>th</sup> percentile for deposit market share in the Miami-Dade County AA. Based on 2002 aggregate HMDA data for the Miami-Dade County AA, the bank ranks at the 85<sup>th</sup> percentile for home purchase loans, the 69<sup>th</sup> percentile for home improvement loans, and the 78<sup>th</sup> percentile for home refinance loans. According to 2002 aggregate small business loan data, the bank ranks at the 78<sup>th</sup> percentile for small loans to businesses in the Miami-Dade County AA.

NTBF's lending activity is similar for the evaluation period January 1, 2003 to December 31, 2003. The bank's market share percentile ranking for home purchase loans, refinance loans, and small loans to businesses is near to, and for home improvement loans is somewhat below, its percentile ranking for deposit market share. FDIC deposit market share data as of June 30, 2003 show that the bank ranks at the 87<sup>th</sup> percentile for deposit market share in the Miami-Dade County AA. Based on 2003 aggregate HMDA data for the Miami-Dade County AA, the bank ranks at the 84<sup>th</sup> percentile for home purchase loans, the 63<sup>rd</sup> percentile for home improvement loans, and the 78<sup>th</sup> percentile for home refinance loans. According to 2003 aggregate small business loan data, the bank ranks at the 75<sup>th</sup> percentile for small loans to businesses in the Miami-Dade County AA.

*Sarasota/Manatee Counties AA* – NTBF’s lending activity reflects excellent responsiveness to credit needs in the *Sarasota/Manatee Counties AA*.

For the evaluation period January 1, 2001 to December 31, 2002, the bank’s market share percentile ranking for home purchase loans significantly exceeds, for home refinance loans meets, and for home improvement loans and small loans to businesses is near to, its percentile ranking for deposit market share. FDIC deposit market share data as of June 30, 2002 show that the bank ranks at the 85<sup>th</sup> percentile for deposit market share in the *Sarasota/Manatee Counties AA*. Based on 2002 aggregate HMDA data for the *Sarasota/Manatee Counties AA*, the bank ranks at the 94<sup>th</sup> percentile for home purchase loans, the 78<sup>th</sup> percentile for home improvement loans, and the 85<sup>th</sup> percentile for home refinance loans. According to 2002 aggregate small business loan data, the bank ranks at the 79<sup>th</sup> percentile for small loans to businesses in the *Sarasota/Manatee Counties AA*.

NTBF’s lending activity is similar for the evaluation period January 1, 2003 to December 31, 2003. The bank’s market share percentile ranking for home purchase loans significantly exceeds, for home refinance loans exceeds, and for home improvement loans and small loans to businesses is near to, its percentile ranking for deposit market share. FDIC deposit market share data as of June 30, 2003 show that the bank ranks at the 84<sup>th</sup> percentile for deposit market share in the *Sarasota/Manatee Counties AA*. Based on 2003 aggregate HMDA data for the *Sarasota/Manatee Counties AA*, the bank ranks at the 94<sup>th</sup> percentile for home purchase loans, the 72<sup>nd</sup> percentile for home improvement loans, and the 87<sup>th</sup> percentile for home refinance loans. According to 2003 aggregate small business loan data, the bank ranks at the 81<sup>st</sup> percentile for small loans to businesses in the *Sarasota/Manatee Counties AA*.

### **Distribution of Loans by Income Level of the Geography**

The bank’s distribution of loans is good among geographies of different income levels. The geographic distribution of loans in the *Miami-Dade County AA* is good, and in the *Sarasota/Manatee Counties AA* is adequate. Because the bank’s market share of home mortgage loans and small loans to businesses in the both the *Miami-Dade County* and *Sarasota/Manatee Counties AAs* is not significant enough to perform a meaningful analysis, we did not consider market share data in evaluating the bank’s geographic distribution of loans in those *AAs*.

### ***Home Mortgage Loans***

The bank’s geographic distribution of home mortgage loans in the *Miami-Dade County AA* is good, and in the *Sarasota/Manatee Counties AA* is adequate. Since NTBF does not have a specific home improvement product, a very limited number of home improvement loans were made during the evaluation period. Therefore, a geographic distribution analysis of those products, as well as multi-family loans, would not be meaningful. Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loans.

*Miami-Dade County AA* – NTBF’s geographic distribution is excellent for home purchase loans and is adequate for refinance loans, in the Miami-Dade County AA.

For the evaluation period January 1, 2001 to December 31, 2002, the percentage of home purchase loans made in low-income geographies significantly exceeds and in moderate-income geographies substantially meets the percentage of owner-occupied housing units within those geographies. The percentage of home refinance loans made in low-income geographies is somewhat below, and in moderate-income geographies is below, the percentage of owner-occupied housing units within those geographies. The difference represents only three home refinance loans in low-income geographies and eight home refinance loans in moderate-income geographies.

For the evaluation period January 1, 2003 to December 31, 2003, the percentage of home purchase loans made in low-income geographies and in moderate-income geographies significantly exceeds the percentage of owner-occupied housing units within those geographies. The bank did not make any home refinance loans in low-income geographies, however, this is reasonable because only 1.7 percent of owner occupied housing units are located in those geographies. The percentage of home refinance loans made in moderate-income geographies is below the percentage of owner-occupied housing units within those geographies. The difference represents only six home refinance loans in moderate-income geographies.

*Sarasota/Manatee Counties AA* – NTBF’s geographic distribution is adequate for home purchase loans and poor for home refinance loans in the Sarasota/Manatee Counties AA.

For the evaluation period January 1, 2001 to December 31, 2002, the percentage of home purchase loans made in the low-income geography exceeds, and in moderate-income geographies is somewhat below, the percentage of owner-occupied housing units within those geographies. The bank made no home refinance loans in the low-income geography. The percentage of home refinance loans made in the moderate-income geographies is below the percentage of owner-occupied housing units within those geographies. In general, the opportunity to make home mortgage loans in the low-income geography is limited because only 0.4 percent of owner-occupied housing units are located in that geography (refer to Market Profile in Appendix B).

For the evaluation period January 1, 2003 to December 31, 2003, the bank made no home purchase or home refinance loans in the low-income geography. The percentage of home purchase loans made in moderate-income geographies is somewhat below the percentage of owner-occupied housing units within those geographies. The percentage of home refinance loans made in the moderate-income geographies is below the percentage of owner-occupied housing units within those geographies. In general, the opportunity to make home mortgage loans in the low-income geography is limited because only 0.3 percent of owner-occupied housing units are located in that geography (refer to Market Profile in Appendix B).

### ***Small Loans to Businesses***

The bank's geographic distribution of small loans to businesses in the Miami-Dade County AA and in the Sarasota/Manatee Counties AA is good. Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small loans to businesses.

*Miami-Dade County AA* – NTBF's geographic distribution is good for small loans to businesses in the Miami-Dade County AA.

For both the January 1, 2001 to December 31, 2002 and January 1, 2003 to December 31, 2003 evaluation periods, the percentage of small loans to businesses made in low-income geographies significantly exceeds and in moderate-income geographies is somewhat below, the percentage of businesses within those geographies.

*Sarasota/Manatee Counties AA* – NTBF's geographic distribution is good for small loans to businesses in the Sarasota/Manatee Counties AA.

For the evaluation period January 1, 2001 to December 31, 2002, the percentage of small loans to businesses made in low-income and in moderate-income geographies significantly exceeds the percentage of businesses within those geographies.

For the evaluation period January 1, 2003 to December 31, 2003, the bank made no small loans to businesses in low-income geographies, however, this is reasonable because only 0.5 percent of businesses are located in those geographies. The percentage of small loans to businesses made in moderate-income geographies is near to the percentage of businesses within those geographies.

### ***Lending Gap Analysis***

Reports detailing NTBF's lending activity over the evaluation period for home mortgage loans and small loans to businesses were reviewed to identify gaps in the geographic distribution of those loans. No unexplained conspicuous gaps were identified in the Miami-Dade County and Sarasota/Manatee Counties AAs.

### ***Inside/Outside Ratio***

A substantial majority, or 88 percent, of NTBF's loans are within its AAs. By number of loans, 86 percent of home mortgage loans, 98 percent of small loans to businesses, and 100 percent of CD loans are within the bank's AAs. The bank's lending within its AAs positively impacts the overall analysis of its geographic distribution of loans. This analysis is based on the bank's performance at the bank level rather than the AA level.

### ***Distribution of Loans by Income Level of the Borrower***

The bank's distribution of loans is good among borrowers of different income levels. The borrower distribution of loans in the Miami-Dade County AAs is good, and in the Sarasota/Manatee Counties AA is adequate. Since NTBF does not have a specific home improvement product, a very limited number of home improvement loans were made during

the evaluation period. Therefore, a borrower distribution analysis of this product would not be meaningful. Because the bank's market share of home mortgage loans and small loans to businesses in the Miami-Dade County AA and in the Sarasota/Manatee Counties AA is not significant enough to perform a meaningful analysis, we did not consider market share data in evaluating the bank's borrower distribution of loans in those AAs.

### ***Home Mortgage Loans***

The bank's distribution of home mortgage loans among individuals of different income levels in the Miami-Dade County AA is good and in the Sarasota/Manatee Counties AA is adequate. Refer to Tables 8, 9 and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loans.

*Miami-Dade County AA* – NTBF's borrower distribution is excellent for home purchase loans and is adequate for home refinance loans, taking into consideration the significant barriers that exist in the Miami-Dade County AA.

For the January 1, 2001 to December 31, 2002 evaluation period, the percentage of home purchase loans made to low-income individuals substantially meets, and to moderate-income individuals significantly exceeds, the percentage of families defined as such. The percentage of home refinance loans made to low-income individuals is significantly below, and to moderate-income individuals is somewhat below, the percentage of families defined as such. The very high poverty rate and the high housing prices in relation to income are significant barriers to making home mortgage loans to low- and moderate-income individuals in the AA (see Market Profile in Appendix B).

For the January 1, 2003 to December 31, 2003 evaluation period, the percentage of home purchase loans made to low-income individuals is somewhat below, and to moderate-income individuals exceeds, the percentage of families defined as such. The percentage of home refinance loans made to low-income individuals is significantly below, and to moderate-income individuals is below, the percentage of families defined as such. The very high poverty rate and the high housing prices in relation to income are significant barriers to making home mortgage loans to low- and moderate-income individuals in the AA (see Market Profile in Appendix B).

*Sarasota/Manatee Counties AA* – NTBF's borrower distribution is adequate for both home purchase and home refinance loans, taking into consideration the barriers that exist in the Sarasota/Manatee Counties AA.

For the January 1, 2001 to December 31, 2002 evaluation period, the percentage of home purchase loans made to low- and moderate-income individuals is significantly below the percentage of families defined as such. The percentage of home refinance loans made to low-income individuals is significantly below and to moderate-income individuals is below the percentage of families defined as such. The high poverty rate and the high housing prices in relation to income are significant barriers to making home mortgage loans to low-income individuals in the AA (see Market Profile in Appendix B).

For the January 1, 2003 to December 31, 2003 evaluation period, the percentage of home purchase loans made to low-income individuals is significantly below, and to moderate-income

individuals is somewhat below, the percentage of families defined as such. The percentage of home refinance loans made to low-income individuals is significantly below, and to moderate-income individuals is below, the percentage of families defined as such. The high poverty rate and the high housing prices in relation to income are significant barriers to making home mortgage loans to low-income individuals in the AA (see Market Profile in Appendix B).

### ***Small Loans to Businesses***

The bank's distribution of small loans to businesses of different revenue sizes in the Miami-Dade County and Sarasota/Manatee Counties AAs is adequate. Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small loans to businesses.

*Miami-Dade County AA* – NTBF's borrower distribution is adequate for small loans to businesses in the Miami-Dade County AA.

For the January 1, 2001 to December 31, 2002 evaluation period, the percentage of small loans to small businesses is somewhat below the percentage of businesses defined as such. Revenue information is not available for five percent of the bank's small loans to businesses in the AA. When loans with no revenue information are excluded from the total, the percentage of the bank's small loans to small businesses increases from 38 to 40 percent. In addition, aggregate small business loan data show that 79 percent of small loans to small businesses in the AA have average loan amounts of \$10,000 or less, and are made by credit card lenders that dominate the market with small business credit card products.

For the January 1, 2003 to December 31, 2003 evaluation period, the percentage of small loans to small businesses is somewhat below the percentage of businesses defined as such. Revenue information is not available for four percent of the bank's small loans to businesses in the AA. When loans with no revenue information are excluded from the total, the percentage of the bank's small loans to small businesses increases from 43 to 45 percent. In addition, aggregate small business loan data show that 79 percent of small loans to small businesses in the AA have average loan amounts of \$10,000 or less, and are made by credit card lenders that dominate the market with small business credit card products.

*Sarasota/Manatee Counties AA* – NTBF's borrower distribution is good for small loans to businesses in the Sarasota/Manatee Counties AA.

For the January 1, 2001 to December 31, 2002 evaluation period, the percentage of small loans to small businesses exceeds the percentage of businesses defined as such. Revenue information is not available for five percent of the bank's small loans to businesses in the AA. When loans with no revenue information are excluded from the total, the percentage of the bank's small loans to small businesses increases from 63 to 68 percent. In addition, aggregate small business loan data show that 76 percent of small loans to small businesses in the AA have average loan amounts of \$10,000 or less, and are made by credit card lenders that capture a majority of the market with small business credit card products.

For the January 1, 2003 to December 31, 2003 evaluation period, the percentage of small loans to small businesses is somewhat below the percentage of businesses defined as such. Revenue information is not available for four percent of the bank's small loans to businesses in



the AA. When loans with no revenue information are excluded from the total, the percentage of the bank's small loans to small businesses increases from 50 to 52 percent. In addition, aggregate small business loan data show that 71 percent of small loans to small businesses in the AA have average loan amounts of \$10,000 or less, and are made by credit card lenders that capture a majority of the market with small business credit card products.

### **Community Development Lending**

The bank's CD lending has a positive impact on the overall Lending Test conclusions. The level of CD lending is excellent and has a positive impact on the conclusions for the Miami-Dade County and the Sarasota/Manatee Counties AAs; however, it was not strong enough to raise the overall Lending Test rating.

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of CD lending. To provide perspective regarding the relative level of CD lending, we allocated a portion of the bank's Tier 1 capital to each AA based on its pro rata share of deposits.

*Miami-Dade County AA* – NTBF has an excellent level of CD loans in the Miami-Dade County AA, given the CD needs and opportunities that exist in the AA (see Market Profile in Appendix B). During the August 20, 2001 to December 31, 2004 evaluation period for CD loans, the bank made 45 CD loans totaling \$16.7 million. The bank's CD lending represents 10.4 percent of Tier 1 capital and addresses the needs for affordable housing. The following examples highlight NTBF's CD lending in the Miami-Dade County AA:

- The bank extended loans totaling nearly \$2 million for construction and rehabilitation of single-family homes and townhomes located in low- and moderate-income geographies. These affordable homes will be sold to low- and moderate-income families with Miami-Dade County Surtax second mortgage financing.
- The bank provided a total of \$9.2 million in multiple mortgages for multifamily housing located in low- and moderate-income geographies. The rents for these units are below the fair market rents as defined by HUD and are affordable for low- and moderate-income renters in the AA.
- The bank extended \$3 million in loans to provide capital for development of low-and moderate-income housing projects. Half of this amount provides capital for an affordable housing development project in the Dade County Enterprise Zone.

*Sarasota/Manatee Counties AA* – NTBF has an excellent level of CD loans, given the CD needs and opportunities that exist in the AA (see Market Profile in Appendix B). During the August 20, 2001 to December 31, 2004 evaluation period for CD loans, the bank made 21 CD loans totaling \$3.1 million. The bank's CD lending represents 5.9 percent of Tier 1 capital and addresses the need for affordable housing. The bank also made \$695,000 in loans to community service organizations for the purpose of CD that were by definition considered in the evaluation of small loans to businesses. The following examples highlight NTBF's CD lending in the Sarasota/Manatee Counties AA:

- The bank extended \$1.5 million in loans to a not-for-profit for construction of affordable housing. The mission of the not-for-profit is to provide affordable housing and down payment assistance for low- and moderate-income residents of South Sarasota County.
- The bank extended \$720,000 in loans for the purchase of affordable duplex rental housing for low- and moderate-income families in Bradenton. The duplexes are affordable to low- and moderate-income persons with rents below the fair market rent of HUD's Section 8 program.

### **Product Innovation and Flexibility**

The bank's use of flexible lending practices in the Miami-Dade County and Sarasota/Manatee Counties AAs has a positive impact on the Lending Test conclusions.

*Miami-Dade County AA* – NTBF makes extensive use of flexible lending practices to address the credit needs of low- and moderate-income individuals and geographies in the Miami-Dade County AA. The following is a description of the bank's flexible loan products offered in the AA:

- Homebuyer's Mortgage Program – During the evaluation period, NTBF originated 39 loans totaling \$3.3 million under this program in the Miami-Dade County AA. This bank-wide mortgage loan program is available to persons with incomes less than 80 percent of the AA's median family income where the property is located in a low- or moderate-income geography. Flexible features of the program include a loan-to-value ratio of up to 95 percent, no private mortgage insurance, and various options for funding the down payment and closing costs. The program provides a fixed rate for 30 years, with no origination or discount points and no internal bank fees.
- Miami-Dade County Surtax Program – This mortgage loan program is the primary funding source for affordable housing in Miami-Dade County, and is available to low- and moderate-income individuals purchasing properties within the county. The county funds second and third mortgage loans directly to the homebuyers at 0 to 3 percent interest rates for 30 years. These second and third mortgage loans generally have the effect of reducing the monthly mortgage payment by half, thereby making the housing affordable to individuals with half the normal required income. NTBF provides the first mortgage financing under this program on the same terms as its Homebuyer's Mortgage Program. During the evaluation period, the bank originated 212 loans totaling \$10 million.
- During the evaluation period the bank also participated in six other flexible lending programs in the Miami-Dade County AA. The bank made 29 loans totaling \$1.6 million in these programs.

*Sarasota/Manatee Counties AA* – NTBF makes use of flexible lending practices to address the credit needs of low- and moderate-income individuals and geographies in the Sarasota/Manatee Counties AA. The bank offers its flexible loan product in the AA.

- Homebuyer's Mortgage Program – During the evaluation period, NTBF originated 62 loans totaling \$5.4 million under this program in the Sarasota/Manatee Counties AA. For a description of this loan program, see Miami-Dade County AA above.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Broward County, Hillsborough/Pinellas Counties, and Lee County AAs was not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test.

In the Collier County, Indian River County, Martin County and Palm Beach AAs, the bank's performance is weaker than its overall performance due to the relatively lower percentage of loans made in low- and moderate-income geographies and to low- and moderate-income individuals and small businesses. The bank's performance in these AAs was taken into consideration, but did not negatively impact the overall Lending Test conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Miami-Dade County AA is adequate and in the Sarasota/Manatee Counties AA is excellent. The bank's investment performance is primarily based on prior period investments, especially in the Sarasota/Manatee AA. Although the bank made a low volume of investments, in both AAs, during the current period, the continuing impact of prior-period investments was considered. Refer to Market Profiles in Appendix B for additional information regarding qualified investment opportunities available in the AAs receiving full-scope reviews.

Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments. To provide perspective regarding the relative level of qualified investments, we allocated a portion of the bank's Tier 1 capital to each AA based on its pro rata share of deposits.

*Miami-Dade County AA* – NTBF has an adequate level of qualified investments that are responsive to credit and CD needs in the Miami-Dade County AA. The volume of total investments represents approximately 2 percent of the allocated Tier 1 capital. The investments primarily address the identified needs for affordable housing and community services (refer to Market Profile in Appendix B). The following is a discussion of NTBF's qualified investments in the Miami-Dade County AA:

- Florida Community Loan Fund – The bank's holding company made an equity investment of \$500,000 in the Florida Community Loan Fund during this evaluation period. The holding company also made a \$500,000 equity investment in the prior evaluation period that is still outstanding. The Fund is a certified community development financial institution (CDFI) whose mission is to provide loans on affordable terms and technical assistance to meet housing, economic development, and social service credit needs in Florida's low-income communities. Based on the bank's AAs receiving the most benefit from the Fund, the investment is equally allocated among the Miami-Dade County, Sarasota/Manatee Counties, Palm Beach County and Hillsborough/Pinellas Counties AAs. Accordingly,

\$125,000 of the current period and \$125,000 of the prior period investment is allocated to the Miami-Dade County AA.

- OneUnited Bank – The bank renewed its prior period investment of \$98,000 in a CD certificate of deposit with OneUnited Bank. OneUnited Bank is a certified CDFI whose mission is to serve CD needs for housing and business lending and financial services, with a particular focus on African-American neighborhoods.
- First Housing Development Corporation of Florida (FHDC) – The bank’s holding company made an equity investment of \$10,000 in FHDC by purchasing 728 shares of stock. FHDC is an affordable housing lender owned by its member banks. It was created to stimulate development and/or rehabilitation of multi-family housing for low- or moderate-income persons. Based on the banks AAs receiving the most benefit from the fund, the investment has been equally allocated amount the Miami-Dade County, Palm Beach County, and Hillsborough/Pinellas Counties AAs. Accordingly, \$3,334 has been allocated to the Miami-Dade AA.
- FHLMC Mortgage-Backed Securities – The bank purchased two pools of Freddie Mac mortgage-backed securities in the prior evaluation period. A total of \$351,000 is still outstanding. The securities were collateralized by mortgage loans to low- and moderate-income individuals within the Broward County, Hillsborough/Pinellas Counties, Miami-Dade County, and Palm Beach County AAs. Based on the AA’s pro rata share of deposits, \$214,000 is allocated to the Miami-Dade County AA.
- FNMA Mortgage-Backed Securities – The bank purchased a pool of Fannie Mae mortgage-backed securities in the prior evaluation period. A total of \$301,000 is still outstanding. The securities are collateralized by mortgage loans to low- and moderate-income individuals within the Broward County, Miami-Dade County, Palm Beach County, and Sarasota/Manatee Counties AAs. Based on the AA’s pro rata share of deposits, \$162,000 is allocated to the Miami-Dade County AA.
- GNMA Mortgage-Backed Securities – The bank purchased two pools of Ginnie Mae mortgage-backed securities in the prior evaluation period. A total of \$257,000 is still outstanding. The securities are collateralized by mortgage loans to low- and moderate-income first-time home buyers through the Housing Finance Authority of Miami-Dade County.
- Florida Housing Tax Credit Funds – During the prior evaluation period, the bank entered into legally binding commitments to make equity investments totaling \$1.25 million in two Florida Housing Tax Credit Funds. The Funds are limited partnerships that acquire, construct, rehabilitate, operate and dispose of affordable rental housing located in the state of Florida and eligible for federal low-income housing tax credits. The Funds make equity financing available to projects, which are often not attractive because of their size, complexity, and long-term use restrictions; therefore, the bank’s investment indirectly provides financing not routinely available from private investors. The bank has funded a total of \$362,000 in the current evaluation period, with \$662,000 remaining in unfunded commitments. Based on the AA’s pro rata share of deposits, \$132,000 of current period funding and \$267,000 of unfunded commitments is allocated to the Miami-Dade County AA.

- Community Development Contributions – The bank made contributions totaling over \$917,000 to 23 organizations for the purpose of providing affordable housing and community services to low- and moderate-income individuals throughout the Miami-Dade County AA.

*Sarasota/Manatee Counties AA* – NTBF has an excellent level of qualified investments that are responsive to credit and CD needs in the Sarasota/Manatee Counties AA. The volume of total investments represents just over 8 percent of the allocated Tier 1 capital. The investments primarily address the identified need for affordable housing and community services (refer to Market Profile in Appendix B). The following is a discussion of NTBF’s qualified investments in the Sarasota/Manatee Counties AA:

- FHLMC Mortgage-Backed Securities – The bank purchased two pools of Freddie Mac mortgage-backed securities during this evaluation period. The securities were collateralized by mortgage loans to low- and moderate-income individuals within the Broward County, Hillsborough/Pinellas Counties, and Palm Beach County AAs. Based on the location of the properties, \$173,000 is allocated to the Sarasota/Manatee Counties AA.
- Florida Community Loan Fund – Based on the bank’s AAs receiving the most benefit from the Fund, \$125,000 of the current period and \$125,000 of the prior period investment is allocated to the Sarasota/Manatee Counties AA. For a description of the investment, see Miami-Dade County AA above.
- Key Investment Fund – During the prior evaluation period, the bank’s holding company made an equity investment in the Key Investment Fund, of which a portion was allocated to NTBF for a multi-family project in Manatee County. The Fund is a limited partnership that acquires, holds, sells, and otherwise invests in properties that are eligible for federal low-income housing tax credits. The bank’s investment indirectly provides financing not routinely available from private investors for these types of projects. A total of \$3.9 million of the investment is still outstanding.
- FNMA Mortgage-Backed Securities – Based on the AA’s pro rata share of deposits, \$54,000 is allocated to the Sarasota/Manatee Counties AA. For a description of the investments, see Miami-Dade County AA above.
- Florida Housing Tax Credit Funds – Based on the AA’s pro rata share of deposits, \$43,000 of current period funding and \$87,000 of unfunded commitments is allocated to the Sarasota/Manatee Counties AA. For a description of the investments, see Miami-Dade County AA above.
- Community Development Contributions – The bank made contributions totaling \$111,000 to 18 organizations for the purpose of providing affordable housing and community services to low- and moderate-income individuals throughout the Sarasota/Manatee Counties AA.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Broward County, Indian River County, and Palm Beach County AAs is not inconsistent with the bank's overall "High Satisfactory" performance under the Investment Test.

In the Collier County, Hillsborough/Pinellas Counties, Lee County, and Martin County AAs, performance is weaker than the bank's overall performance due to the relatively lower volume of investments.

The bank's performance in these AAs was taken into consideration, but did not impact, negatively or positively, the overall Investment Test conclusions. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Miami-Dade County and Sarasota/Manatee Counties AAs is good.

### Retail Banking Services

The bank has adequate accessibility of its service delivery systems to geographies and individuals of different income levels. Accessibility of service delivery systems in the Miami-Dade County is adequate and Sarasota/Manatee Counties AAs is good. Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

*Miami-Dade County AA* – NTBF's systems for delivering retail banking services are reasonably accessible to geographies and individuals of different income levels in the Miami-Dade County AA. The following is a discussion of the bank's service delivery systems in the AA:

- The distribution of the bank's branches in the Miami-Dade County AA is adequate. Based on both 1990 and 2000 Census data, none of the bank's five branches were in low- or moderate-income geographies of the AA. Based on 1990 Census data, two of the offices were located adjacent to or near low- or moderate-income geographies. Based on 2000 Census data, one branch was located adjacent to or near low- or moderate-income geographies. The changes between the two periods are due to differences between the 1990 Census Data and 2000 Census Data. Also, the bank's lending activity showed that it served geographies and individuals of all income levels. As discussed in the Lending Test Section, the bank had a good dispersion of home mortgage loans to both low- and moderate-income geographies and low- and moderate-income borrowers.

- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems in the Miami-Dade County AA. During the evaluation period, the bank relocated one branch from one upper-income geography of the AA to another.
- The bank offers various alternative systems for delivering retail banking services in the Miami-Dade County AA. While the bank owns and operates no ATMs in the AA, it participates in major ATM networks that allow its customers to use any participating ATM in Florida at no charge by the bank. Other alternative delivery systems include free telephone and on-line banking, direct deposit, and bank-by-mail services. Because no data were available concerning the effectiveness of these services to low- and moderate-income geographies and individuals, significant weight was not placed on alternative delivery systems in the overall Service Test conclusions.
- The bank's services and business hours are tailored to the convenience and needs of the Miami-Dade County AA, including low- and moderate-income geographies and individuals. The bank offers comparable business hours among the AA's branches, which consist of regular hours Monday through Friday. The bank provides the same loan and deposit products at all branches, including a flexible mortgage loan program and low-cost deposit accounts. To supplement its branch-based services and hours, the bank maintains a structured network of partnerships with local CD organizations through which it provides products and services targeted to low- and moderate-income geographies and individuals in the AA.

*Sarasota/Manatee Counties AA* – NTBF's systems for delivering retail banking services are accessible to geographies and individuals of different income levels in the Sarasota/Manatee Counties AA. The following is a discussion of the bank's service delivery systems in the AA:

- The distribution of the bank's branches in the Sarasota/Manatee Counties AA is good. Based on the 1990 census, the percentage of the branches located in moderate-income geographies substantially exceeds the distribution of the population within those geographies. While the bank had no branches in the one low-income geography of the AA, two branches were located adjacent to or near low- or moderate-income geographies. Based on the 2000 Census, none of the bank's four branches were in low- or moderate-income geographies of the AA. Two are located adjacent to or near low- or moderate-income geographies. The changes between the two periods are due to differences between the 1990 Census Data and 2000 Census Data. Also, the bank's lending activity showed that it served geographies and individuals of all income levels. As discussed in the Lending Test Section, the bank had an adequate dispersion of home mortgage loans to both low- and moderate-income geographies and low- and moderate-income borrowers.
- The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems in the Sarasota/Manatee Counties AA. During the evaluation period, the bank closed one branch in a middle-income geography of the AA.
- The bank offers various alternative systems for delivering retail banking services in the Sarasota/Manatee Counties AA. While the bank owns and operates no ATMs in the AA, it participates in major ATM networks that allow its customers to use any participating ATM in

Florida at no charge by the bank. For a description of other bank-wide alternative delivery systems, see Miami-Dade County AA above.

- The bank's services and business hours are tailored to the convenience and needs of the Sarasota/Manatee Counties AA, including low- and moderate-income geographies and individuals. See Miami-Dade County AA above for a description of business hours, products, and services also applicable to this AA.

### **Community Development Services**

The bank's provision of CD services is excellent in the Miami-Dade County and Sarasota/Manatee Counties AAs.

*Miami-Dade County AA* – NTBF is a leader in providing CD services in the Miami-Dade County AA, based on the high level of services provided in leadership positions and the responsiveness of the services to credit and CD needs. The bank provides direct financial services in the form of low-cost basic checking and savings accounts designed to meet the needs of low- and moderate-income individuals. Bank officers also provide leadership and technical assistance on financial matters to CD organizations. From 2001 through 2004, 14 bank officers and employees provided almost 2,000 hours in technical assistance to 18 different organizations, and participated in 13 credit counseling and education programs which reached over 300 attendees, in the Miami-Dade County AA. The CD services provided by the bank primarily address the identified needs for affordable housing and community services (refer to Market Profile in Appendix B). The following examples highlight NTBF's CD services in the Miami-Dade County AA:

- **Basic Checking and Savings Accounts** – The bank offers low-cost basic checking and savings accounts designed to be affordable to low- and moderate-income individuals. The basic checking account features no minimum balance requirement, the first 15 checks covered by a monthly maintenance fee of \$8, and a per-item fee of 50 cents for each additional check. The basic savings account features no maintenance fee with a \$100 quarterly average balance; otherwise the maintenance fee is \$5 per quarter. In the Miami-Dade County AA, the bank has 363 basic checking accounts and 902 basic savings accounts outstanding on its books.
- **Greater Miami Neighborhoods** – The purpose of this non-profit corporation is to solicit private sector participation, and channel resources from the public and private sectors, in order to provide adequate housing for low-income persons. The organization also provides grants and assistance to other groups interested in the development of adequate housing for low-income persons. A senior bank officer is vice-chairman of the board of directors and serves on the executive, asset management, and development committees.
- **Miami-Dade Housing Agency/Bank Partnership Program** – This is an affordable mortgage loan program that is funded by State of Florida State Housing Initiative Partnership (SHIP) funds and administered by the Miami-Dade County Housing Agency. The program was designed to serve very low-, low- and moderate-income families. A bank officer and another bank employee provide credit education services, handle borrower interviews, and perform prequalification services for the program.



- Community Partnership for the Homeless – This non-profit corporation operates two homeless assistance centers in Miami-Dade County and raises funds for the capital and operation of the centers. Two senior bank officers are members of the board of directors. One also serves on the finance and audit committees; the other also serves on the investment committee.
- Florida Community Loan Fund – This is a certified community development financial institution (CDFI) whose mission is to provide loans on affordable terms and technical assistance to meet housing, economic development, and social service credit needs in Florida's low-income communities. A senior bank officer is a member of the CDFI's board of directors, serves as treasurer and is a member of the finance committee.

*Sarasota/Manatee Counties AA* – NTBF is a leader in providing CD services in the Sarasota/Manatee Counties AA, based on the high level of services provided in leadership positions and the responsiveness of the services to credit and CD needs. The bank provides direct financial services in the form of low-cost basic checking and savings accounts designed to meet the needs of low- and moderate-income individuals. Bank officers also provide leadership and technical assistance on financial matters to CD organizations. From 2001 through 2004, 12 bank officers and employees provided 1,460 hours in technical assistance to 16 different organizations in the Sarasota/Manatee Counties AA. The CD services provided by the bank primarily address the identified needs for affordable housing and community services (refer to Market Profile in Appendix B). The following examples highlight NTBF's CD services in the Sarasota/Manatee Counties AA:

- Basic Checking and Savings Accounts – In the Sarasota/Manatee Counties AA, the bank has 124 basic checking accounts and 766 basic savings accounts outstanding on its books. For a description of the accounts, see Miami-Dade County AA above.
- Royal Venice – This is a non-profit corporation located in the city of Venice, which provides down payment assistance and below-market housing to low- and moderate-income first-time homebuyers. The organization receives funding from the public and private sectors for the down payment assistance and to purchase lots and construct affordable single-family homes in South Sarasota County. A senior bank officer is a member of the board of directors and serves on the loan committee and the site selection committee.
- Resurrection House – This is a day shelter dedicated to ministering to the homeless of Sarasota County. The shelter's facilities and services include clean restrooms and showers, a laundry service, counseling, in-house health clinic, telephones for medical, housing and employment needs, mail service, transportation, and snacks. A bank officer is a member of the board, chairs the endowment committee, and serves on the finance committee.
- Community Development Advisory Committee – Serving as an advisory board to the Sarasota County and City of Sarasota commissions, the purpose of this committee is to provide input on and prepare the five-year consolidated plan on affordable housing and CD for the U. S. Department of Housing and Urban Development. A bank officer serves as vice-president of the board, representing all lending institutions in Sarasota County.

- Children First, Inc. – This non-profit organization provides Early Head Start and Head Start programs for Sarasota County. They provide a safe place to learn, nutritious meals and a nurturing environment for children of low-income families. In order to qualify for Early Head Start or Head Start programs, a family must have an annual income that falls below the national poverty level. A bank officer serves as president of the board of directors and is a member of the finance committee.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Service test performance in the Hillsborough/Pinellas Counties AA is stronger than the bank's overall "High Satisfactory" performance under the Service Test due to an excellent branch distribution.

Service test performance in the Broward County, Collier County, Indian River County, Lee County, Martin County, and Palm Beach County AAs is weaker than the bank's overall "High Satisfactory" performance under the Service Test due to a poor branch distribution

The bank's performance in these AAs was taken into consideration, but did not impact, negatively or positively, the overall Service Test conclusions. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

## Appendix A: Scope of Evaluation

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 assessment areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): Community Development Services: Investment Test, Retail Banking, and CD Loans:	1/01/01 to 12/31/03 1/01/01 to 12/31/04 8/20/01 to 12/31/04
<b>Financial Institution</b>		<b>Products Reviewed</b>
Northern Trust Bank of Florida, N.A. (NTBF) Miami, Florida		Home Mortgage Loans Small Loans to Businesses Community Development Loans Qualified Investments
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Northern Trust Corporation (NTC)	Holding Company	Qualified Investments
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Broward County Collier County Hillsborough/Pinellas Counties Indian River County Lee County Martin County Miami-Dade County Palm Beach County Sarasota/Manatee Counties	Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Limited Scope Full Scope Limited Scope Full Scope	

# Appendix B: Market Profiles for Full-Scope Areas

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### Market Profiles for Areas Receiving Full-Scope Reviews

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## Miami-Dade County

### 1990 Census Data

Demographic Information for Full-Scope Area: Miami-Dade County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	267	13.48	21.35	35.96	28.09	1.12
Population by Geography	1,937,094	9.18	19.43	39.47	31.91	0.01
Owner-Occupied Housing by Geography	376,006	3.26	12.86	40.83	43.05	0.00
Businesses by Geography	200,697	8.82	17.32	31.37	42.14	0.00
Farms by Geography	2,196	3.51	11.79	36.29	48.41	0.00
Family Distribution by Income Level	485,213	23.32	16.40	19.19	41.09	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	192,734	15.03	27.92	40.30	16.76	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$ 31,113 = \$ 48,200 = 17.62%		Median Housing Value Unemployment Rate	= \$100,570 = 3.87%		

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

Source: 1990 U.S. Census and 2002 HUD updated MFI.

### 2000 Census Data

Demographic Information for Full-Scope Area: Miami-Dade County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	347	7.78	28.53	32.85	29.97	0.86
Population by Geography	2,253,362	4.89	28.61	35.68	30.79	0.02
Owner-Occupied Housing by Geography	449,333	1.69	19.82	36.99	41.51	0.00
Businesses by Geography	209,400	5.27	22.49	32.39	39.42	0.43
Farms by Geography	2,649	2.15	17.70	33.26	46.77	0.11
Family Distribution by Income Level	552,484	23.00	16.98	18.53	41.50	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	220,856	8.31	40.20	35.41	16.08	0.00
Median Family Income HUD Adjusted Median Family Income for 2003 Households Below the Poverty Level	= \$ 40,260 = \$ 43,800 = 18.08%		Median Housing Value Unemployment Rate	= \$123,974 = 3.92%		

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

Source: 2000 U.S. Census and 2003 HUD updated MFI.

The Miami-Dade County AA consists of the entire county, which also represents the entire Miami, Florida MSA. NTBF has five offices located throughout the AA, including two in Miami and one each in Coral Gables, Aventura, and Key Biscayne. As of June 30, 2004, 40 percent of NTBF's deposits were derived from this AA. Over the evaluation period, 19 percent of the bank's home mortgage loans and 25 percent of its small loans to businesses were derived from this AA.

NTBF's deposits in the Miami-Dade County AA total approximately \$1.5 billion. Based on FDIC deposit market share data as of June 30, 2004, this equates to a 2.4 percent deposit market share and ranks NTBF as the 10<sup>th</sup> largest deposit taking institution in the AA. The leading deposit taking institution has a 17 percent deposit market share.

The FDIC deposit market share data also show that there is intense banking competition in the AA. There are 78 banks in the AA with a total of 572 offices. The largest bank inside the AA has 72 offices with over \$10.5 billion in deposits, and the second largest bank has 64 offices with almost \$9.2 billion in deposits. Together, the top two banks capture over 31 percent deposit market share in the AA.

Based on 2003 aggregate data, the competition for home mortgage loans and small loans to businesses is also intense. There are 817 home mortgage lenders and 147 small business lenders in the AA. The top 10 home mortgage lenders, which capture a combined market share of 45 percent, consist of large nationwide and regional banks and mortgage companies. The top five small business lenders, which dominate the AA with a combined market share of 65 percent, are nationwide credit card banks.

As of November 2004, the unemployment rate for the AA averaged 5.7 percent, compared to the state unemployment rate of 4.3 percent and the national unemployment rate of 5.4 percent. Major industries in the AA include government (15 percent), professional and business services (14 percent), educational and health services (13 percent), and retail trade (12 percent).

In order to ascertain credit and CD needs and opportunities, we made a community contact with a local housing finance authority during the evaluation. In addition, we reviewed information from various other sources, including three recent community contacts made by a federal bank regulatory agency, recent CRA performance evaluations of other banks located in the AA, and the OCC's district community affairs officer.

Based on the aforementioned information, unmet credit and CD needs exist in the AA for housing affordable to low- and moderate-income individuals, economic development (including small business financing), and community services for low- and moderate-income individuals. Affordable housing needs include loans for home purchase, construction of single- and multi-family rental properties, and home improvement.

However, the information revealed barriers to meeting the affordable housing needs. Rising land and construction costs due to tougher building codes have resulted in housing prices beyond the reach of many low- and moderate-income residents in the AA. Data from the National Association of Realtors (NAR) also show median housing prices in the AA increasing from \$163,000 in 2001 to \$291,000 in 2004. Based on the updated HUD median family

income for 2004, traditional lending standards, and current interest rates, the maximum home value that low- and moderate-income families could afford is approximately \$95,000 and \$151,000, respectively. Further, data from the National Low-Income Housing Coalition indicate that 29 percent of renters in the AA are unable to afford the fair market rent for a two-bedroom unit.

The information obtained from the abovementioned sources also indicates that a high level of community resources and opportunities for partnerships exist to facilitate activities to address unmet credit and CD needs of the AA. Opportunities are available to participate in affordable housing and small business lending programs, and to make loans to, invest in, and provide services to various projects, programs, and organizations that have a CD purpose. However, due to the large number of banks in the AA, competition for CD loans, investments, and services is high.

**Sarasota/Manatee Counties**

**1990 Census Data**

Demographic Information for Full-Scope Area: Sarasota/Manatee Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	87	1.15	19.54	54.02	22.99	2.30
Population by Geography	489,483	0.83	18.21	59.69	21.27	0.00
Owner-Occupied Housing by Geography	160,172	0.40	13.77	63.01	22.82	0.00
Businesses by Geography	52,840	0.49	18.85	57.07	23.58	0.01
Farms by Geography	1,422	0.28	9.28	66.88	23.56	0.00
Family Distribution by Income Level	146,968	16.01	20.63	24.71	38.65	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	53,853	1.45	25.70	60.23	12.61	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$ 33,128 = \$ 53,400 = 7.92%	Median Housing Value Unemployment Rate		= \$ 96,009 = 1.84%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census and 2002 HUD updated MFI.

**2000 Census Data**

Demographic Information for Full-Scope Area: Sarasota/Manatee Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	143	0.70	21.68	54.55	23.08	0.00
Population by Geography	589,959	0.67	25.18	52.78	21.37	0.00
Owner-Occupied Housing by Geography	210,474	0.30	20.46	55.35	23.90	0.00
Businesses by Geography	55,033	0.46	22.41	53.03	24.09	0.00
Farms by Geography	1,652	0.24	15.68	58.11	25.97	0.00
Family Distribution by Income Level	169,248	17.68	19.61	23.59	39.12	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	63,123	0.98	35.29	51.38	12.35	0.00
Median Family Income HUD Adjusted Median Family Income for 2003 Households Below the Poverty Level	= \$ 48,623 = \$ 52,600 = 7.98%	Median Housing Value Unemployment Rate		= \$126,784 = 1.58%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 U.S. Census and 2003 HUD updated MFI.



The Sarasota/Manatee Counties AA consists of the entire counties of Sarasota and Manatee, which also represent the entire Sarasota-Bradenton, Florida MSA. NTBF has four offices located throughout the AA. Two offices are located in Sarasota County, one each in Sarasota and Venice. Two offices are located in Manatee County, one each in Bradenton and Longboat Key. As of June 30, 2004, 13 percent of NTBF's deposits were derived from this AA. Over the evaluation period, 23 percent of the bank's home mortgage loans and 16 percent of its small loans to businesses were derived from the AA.

NTBF's deposits in the Sarasota/Manatee Counties AA total approximately \$481 million. Based on FDIC deposit market share data as of June 30, 2004, this equates to a 3.4 percent deposit market share and ranks NTBF as the 8<sup>th</sup> largest deposit taking institution in the AA. The leading deposit taking institution has a 25 percent deposit market share.

The FDIC deposit market share data also show that there is intense banking competition in the AA. There are 43 banks in the AA with a total of 268 offices. The largest bank inside the AA has 45 offices with \$3.6 billion in deposits, and the second largest bank has 26 offices with over \$1.9 billion in deposits. Together, the top two banks capture over 38 percent deposit market share in the AA.

Based on 2003 aggregate data, the competition for home mortgage loans and small loans to businesses is also intense. There are 837 home mortgage lenders and 142 small business lenders in the AA. The top 10 home mortgage lenders, which capture a combined market share of 45 percent, consist of large nationwide and regional banks and mortgage companies. The top five small business lenders, which dominate the AA with a combined market share of 63 percent, are nationwide credit card banks.

During 2000, the unemployment rate for the AA averaged 2.9 percent, compared to the state unemployment rate of 4.3 percent and the national unemployment rate of 5.4 percent. Major industries include professional and business services (27 percent), retail trade (13 percent), education and health services (13 percent), and leisure and hospitality services (10 percent).

In order to ascertain credit and CD needs and opportunities, we made one community contact during the evaluation. In addition, we reviewed information from various other sources, including a recent community contact made by a federal bank regulatory agency, recent CRA performance evaluations of other banks located in the AA, and the OCC's district community affairs officer.

Based on the aforementioned information, unmet credit and CD needs exist in the AA for housing affordable to low- and moderate-income individuals, economic development (including small business financing), and community services for low- and moderate-income individuals. Affordable housing needs include loans for home purchase, construction of single- and multi-family rental properties, and home improvement.

However, the information revealed barriers to meeting the affordable housing needs. Rising land and construction costs due to tougher building codes have resulted in housing prices beyond the reach of many low- and moderate-income residents in the AA. Data from the National Association of Realtors (NAR) also show median housing prices in the AA increasing from \$176,000 in 2002 to \$270,000 in 2004. Based on the updated HUD median family income for 2004, traditional lending standards, and current interest rates, the maximum home

value that low- and moderate-income families could afford is approximately \$113,000 and \$181,000, respectively. Further, data from the National Low-Income Housing Coalition indicate that 23 percent of renters in the AA are unable to afford the fair market rent for a two-bedroom unit.

The information obtained from the above mentioned sources also indicate that a high level of community resources and opportunities for partnerships exist to facilitate activities to address unmet credit and CD needs of the AA. Opportunities are available to participate in affordable housing and small business lending programs, and to make loans to, invest in, and provide services to various projects, programs, and organizations that have a CD purpose. However, due to the large number of banks in the AA, competition for CD loans, investments, and services is high.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

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

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

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

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

**Table 14. Qualified Investments -** Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's AA. See Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

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

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
<b>Full Review:</b>												
Miami Dade County AA	20.91	586	181,375	175	39,932	0	0	17	8,273,226	778	8,494,533	41.48
Sarasota/Manatee Counties AA	21.67	688	207,801	109	15,839	0	0	9	396,960	806	620,600	14.45
<b>Limited Review:</b>												
Broward County AA	10.43	323	74,818	64	14,352	0	0	1	2,600,000	388	2,689,170	7.85
Collier County AA	8.17	268	143,675	36	6,724	0	0	0	0	304	150,399	8.43
Hillsborough/Pinellas Counties AA	9.68	274	57,578	71	11,659	0	0	15	728,103	360	797,340	4.32
Indian River County AA	8.58	262	86,076	55	9,162	0	0	2	200,000	319	295,238	5.63
Lee County AA	7.31	242	69,802	30	3,382	0	0	0	0	272	73,184	4.99
Martin County AA	1.90	59	20,116	12	3,254	0	0	0	0	71	23,370	1.58
Palm Beach County AA	11.34	326	133,823	95	19,466	0	0	1	250,000	422	403,289	11.26

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	
<b>Full Review:</b>												
Miami-Dade County AA	19.97	291	101,358	67	14,281	0	0	28	8,491,640	386	8,607,279	41.54
Sarasota/Manatee Counties AA	22.10	367	116,336	48	10,815	0	0	12	2,684,880	427	2,812,031	13.64
<b>Limited Review:</b>												
Broward County AA	12.47	200	58,443	40	10,692	0	0	1	50,000	241	119,135	8.96
Collier County AA	6.52	120	47,772	6	1,846	0	0	0	0	126	49,618	6.06
Hillsborough/Pinellas Counties AA	8.59	122	33,722	33	6,344	0	0	11	1,086,875	166	1,126,941	5.39
Indian River County AA	9.83	150	71,902	36	8,167	0	0	4	289,331	190	369,400	5.56
Lee County AA	6.88	106	26,158	24	3,936	0	0	3	2,120,000	133	2,150,094	5.07
Martin County AA	2.02	32	10,206	7	789	0	0	0	0	39	10,995	1.66
Palm Beach County AA	11.59	164	72,300	57	12,778	0	0	3	600,000	224	685,078	12.13

\*Loan Data as of December 31, 2002. Rated area refers to either state or multi-state MA rating area. + Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from August 20, 2001 to December 31, 2004. ++ The evaluation period for Community Development Loans is from August 20, 2001 to December 31, 2004.

\*\*\* Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate. +++ Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Miami Dade County AA	400	20.84	3.26	6.25	12.86	12.50	40.83	23.50	43.05	57.75	0.28	0.47	0.36	0.18	0.31	
Sarasota/Manatee Counties AA	473	24.65	0.40	0.42	13.77	8.25	63.01	56.24	22.82	35.10	0.88	3.33	0.95	0.73	1.20	
<b>Limited Review:</b>																
Broward County AA	204	10.63	1.11	0.00	14.40	13.73	58.86	42.65	25.64	43.63	0.16	0.00	0.23	0.09	0.27	
Collier County AA	173	9.02	1.18	0.00	7.73	1.16	57.92	40.46	33.17	58.38	0.57	0.00	0.17	0.30	1.16	
Hillsborough/Pinellas Counties AA	134	6.98	1.14	2.99	12.96	11.94	48.43	32.09	37.47	52.99	0.12	0.57	0.12	0.11	0.13	
Indian River County AA	132	6.88	0.00	0.00	2.78	0.00	37.87	12.88	59.35	87.12	1.40	0.00	0.00	0.68	1.88	
Lee County AA	187	9.74	0.53	1.60	13.44	12.30	74.89	68.98	11.14	17.11	0.37	9.52	0.65	0.30	0.61	
Martin County AA	33	1.72	0.00	0.00	4.63	3.03	57.76	27.27	37.61	69.70	0.35	0.00	0.81	0.22	0.49	
Palm Beach County AA	183	9.54	0.94	1.09	20.87	19.13	46.30	24.59	31.90	55.19	0.20	0.43	0.29	0.10	0.31	

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Miami-Dade County AA	153	19.37	1.69	2.61	19.82	27.45	36.99	16.99	41.51	52.94	0.20	0.25	0.28	0.10	0.25	
Sarasota/Manatee Counties AA	210	26.58	0.30	0.00	20.46	13.81	55.35	33.33	23.90	52.86	0.75	0.00	0.67	0.47	1.28	
<b>Limited Review:</b>																
Broward County AA	83	10.51	1.02	3.61	23.81	18.07	45.93	27.71	29.24	50.60	0.11	0.26	0.10	0.07	0.17	
Collier County AA	73	9.24	2.30	0.00	13.08	2.74	47.98	46.58	36.65	50.68	0.49	0.00	0.12	0.48	0.61	
Hillsborough/Pinellas Counties AA	60	7.59	1.00	1.67	15.86	20.00	48.51	33.33	34.62	45.00	0.09	0.14	0.13	0.07	0.09	
Indian River County AA	59	7.47	0.00	0.00	2.17	0.00	54.11	11.86	43.72	88.14	1.29	0.00	0.00	0.30	2.33	
Lee County AA	64	8.10	0.87	7.81	13.24	14.06	63.06	31.25	22.84	46.88	0.23	11.11	0.33	0.12	0.37	
Martin County AA	18	2.28	0.00	0.00	6.93	5.56	49.37	38.89	43.70	55.56	0.34	0.00	0.47	0.29	0.38	
Palm Beach County AA	70	8.86	1.53	4.29	24.63	24.29	36.35	20.00	37.50	51.43	0.13	0.40	0.14	0.07	0.16	

\* Based on 2002 Peer Mortgage Data (SE) +Based on 2003 Peer Mortgage Data (Eastern)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information. +++ Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Miami Dade County AA	36	15.93	3.26	5.56	12.86	5.56	40.83	19.44	43.05	69.44	0.42	0.84	0.21	0.21	0.60	
Sarasota/Manatee Counties AA	54	23.89	0.40	0.00	13.77	1.85	63.01	42.59	22.82	55.56	1.52	0.00	0.00	1.26	3.07	
<b>Limited Review:</b>																
Broward County AA	37	16.37	1.11	2.70	14.40	2.70	58.86	29.73	25.64	64.86	0.51	0.00	0.00	0.26	1.08	
Collier County AA	18	7.96	1.18	0.00	7.73	5.56	57.92	38.89	33.17	55.56	1.87	0.00	4.17	0.91	3.97	
Hillsborough/Pinellas Counties AA	36	15.93	1.14	0.00	12.96	2.78	48.43	30.56	37.47	66.67	0.40	0.00	0.17	0.29	0.58	
Indian River County AA	8	3.54	0.00	0.00	2.78	0.00	37.87	12.50	59.35	87.50	1.48	0.00	0.00	0.00	2.78	
Lee County AA	8	3.54	0.53	0.00	13.44	0.00	74.89	75.00	11.14	25.00	0.33	0.00	0.00	0.30	0.70	
Martin County AA	5	2.21	0.00	0.00	4.63	0.00	57.76	40.00	37.61	60.00	0.31	0.00	0.00	0.00	0.77	
Palm Beach County AA	24	10.62	0.94	0.00	20.87	0.00	46.30	8.33	31.90	91.67	0.71	0.00	0.00	0.09	1.50	

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003									
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography+					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Miami-Dade County AA	8	14.81	1.69	0.00	19.82	25.00	36.99	0.00	41.51	75.00	0.30	0.00	0.40	0.00	0.51	
Sarasota/Manatee Counties AA	12	22.22	0.30	0.00	20.46	0.00	55.35	33.33	23.90	66.67	1.03	0.00	0.00	0.56	3.21	
<b>Limited Review:</b>																
Broward County AA	11	20.37	1.02	0.00	23.81	0.00	45.93	18.18	29.24	81.82	0.42	0.00	0.00	0.17	0.93	
Collier County AA	1	1.85	2.30	0.00	13.08	0.00	47.98	100.00	36.65	0.00	0.28	0.00	0.00	0.52	0.00	
Hillsborough/Pinellas Counties AA	4	7.41	1.00	0.00	15.86	0.00	48.51	25.00	34.62	75.00	0.10	0.00	0.00	0.05	0.18	
Indian River County AA	6	11.11	0.00	0.00	2.17	0.00	54.11	0.00	43.72	100.00	1.86	0.00	0.00	0.00	4.72	
Lee County AA	3	5.56	0.87	33.33	13.24	0.00	63.06	66.67	22.84	0.00	0.30	16.67	0.00	0.30	0.00	
Martin County AA	1	1.85	0.00	0.00	6.93	0.00	49.37	0.00	43.70	100.00	0.40	0.00	0.00	0.00	0.79	
Palm Beach County AA	8	14.81	1.53	0.00	24.63	12.50	36.35	12.50	37.50	75.00	0.42	0.00	0.26	0.14	0.78	

\* Based on 2002 Peer Mortgage Data (SE) + Based on 2003 Peer Mortgage Data (Eastern)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information. \*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.



**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Miami Dade County AA	143	16.44	3.26	2.10	12.86	5.59	40.83	16.78	43.05	75.52	0.13	0.00	0.04	0.08	0.18	
Sarasota/Manatee Counties AA	159	18.28	0.40	0.00	13.77	5.03	63.01	42.77	22.82	52.20	0.31	0.00	0.15	0.20	0.58	
<b>Limited Review:</b>																
Broward County AA	80	9.20	1.11	0.00	14.40	5.00	58.86	30.00	25.64	65.00	0.06	0.00	0.00	0.04	0.11	
Collier County AA	77	8.85	1.18	0.00	7.73	0.00	57.92	32.47	33.17	67.53	0.22	0.00	0.00	0.12	0.40	
Hillsborough/Pinellas Counties AA	103	11.84	1.14	2.91	12.96	12.62	48.43	18.45	37.47	66.02	0.08	0.00	0.07	0.03	0.12	
Indian River County AA	122	14.02	0.00	0.00	2.78	0.00	37.87	9.84	59.35	90.16	1.85	0.00	0.00	0.65	2.56	
Lee County AA	47	5.40	0.53	0.00	13.44	6.38	74.89	61.70	11.14	31.91	0.07	0.00	0.15	0.06	0.12	
Martin County AA	21	2.41	0.00	0.00	4.63	4.76	57.76	38.10	37.61	57.14	0.18	0.00	0.67	0.16	0.17	
Palm Beach County AA	118	13.56	0.94	1.69	20.87	3.39	46.30	24.58	31.90	70.34	0.12	0.76	0.02	0.07	0.20	

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003						Market Share (%) by Geography+				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography+					
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Miami-Dade County AA	116	16.86	1.69	0.00	19.82	5.17	36.99	10.34	41.51	84.48	0.10	0.00	0.03	0.03	0.17	
Sarasota/Manatee Counties AA	144	20.93	0.30	0.00	20.46	5.56	55.35	39.58	23.90	54.86	0.31	0.00	0.14	0.22	0.55	
<b>Limited Review:</b>																
Broward County AA	101	14.68	1.02	0.99	23.81	5.94	45.93	30.69	29.24	62.38	0.09	0.10	0.03	0.06	0.13	
Collier County AA	46	6.69	2.30	0.00	13.08	2.17	47.98	26.09	36.65	71.74	0.19	0.00	0.04	0.10	0.35	
Hillsborough/Pinellas Counties AA	58	8.43	1.00	0.00	15.86	13.79	48.51	18.97	34.62	67.24	0.05	0.00	0.05	0.02	0.07	
Indian River County AA	85	12.35	0.00	0.00	2.17	0.00	54.11	8.24	43.72	91.76	1.23	0.00	0.00	0.22	2.19	
Lee County AA	39	5.67	0.87	0.00	13.24	2.56	63.06	28.21	22.84	69.23	0.10	0.00	0.04	0.05	0.23	
Martin County AA	13	1.89	0.00	0.00	6.93	0.00	49.37	15.38	43.70	84.62	0.13	0.00	0.00	0.05	0.21	
Palm Beach County AA	86	12.50	1.53	1.16	24.63	8.14	36.35	20.93	37.50	69.77	0.10	0.14	0.05	0.06	0.15	

\* Based on 2002 Peer Mortgage Data (SE) +Based on 2003 Peer Mortgage Data (Eastern)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information. + + + Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>					
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Miami Dade County AA	7	53.85	13.42	42.86	21.25	42.86	36.01	14.29	29.33	0.00	0.69	1.32	1.01	0.00	0.00	
Sarasota/Manatee Counties AA	2	15.38	0.37	0.00	18.70	100.00	43.61	0.00	37.33	0.00	2.44	0.00	7.14	0.00	0.00	
<b>Limited Review:</b>																
Broward County AA	2	15.38	1.36	0.00	15.78	50.00	58.91	50.00	23.95	0.00	0.00	0.00	0.00	0.00	0.00	
Collier County AA	0	0.00	1.80	0.00	2.10	0.00	41.08	0.00	55.03	0.00	0.00	0.00	0.00	0.00	0.00	
Hillsborough/Pinellas Counties AA	1	7.69	3.69	0.00	13.07	0.00	51.24	0.00	32.00	100.00	0.00	0.00	0.00	0.00	0.00	
Indian River County AA	0	0.00	0.00	0.00	1.95	0.00	14.42	0.00	83.63	0.00	0.00	0.00	0.00	0.00	0.00	
Lee County AA	0	0.00	0.86	0.00	5.77	0.00	66.84	0.00	26.53	0.00	0.00	0.00	0.00	0.00	0.00	
Martin County AA	0	0.00	0.00	0.00	7.81	0.00	51.94	0.00	40.25	0.00	0.00	0.00	0.00	0.00	0.00	
Palm Beach County AA	1	7.69	2.23	0.00	24.05	0.00	36.35	100.00	37.37	0.00	0.83	0.00	0.00	1.54	0.00	

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>+</sup>					
	#	% of Total++	% of MF Units+++	% BANK Loans	% MF Units+++	% BANK Loans	% MF Units+++	% BANK Loans	% MF Units+++	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Miami-Dade County AA	14	70.00	6.85	7.14	35.49	14.29	30.24	57.14	27.42	21.43	2.15	0.83	0.58	6.11	5.17	
Sarasota/Manatee Counties AA	1	5.00	0.53	0.00	20.94	0.00	43.09	100.00	35.44	0.00	1.79	0.00	0.00	3.57	0.00	
<b>Limited Review:</b>																
Broward County AA	5	25.00	2.17	0.00	32.58	20.00	48.64	60.00	16.61	20.00	1.39	0.00	0.74	1.94	2.70	
Collier County AA	0	0.00	2.08	0.00	7.03	0.00	35.11	0.00	55.78	0.00	0.00	0.00	0.00	0.00	0.00	
Hillsborough/Pinellas Counties AA	0	0.00	4.58	0.00	18.09	0.00	48.34	0.00	28.99	0.00	0.00	0.00	0.00	0.00	0.00	
Indian River County AA	0	0.00	0.00	0.00	4.08	0.00	44.19	0.00	51.73	0.00	0.00	0.00	0.00	0.00	0.00	
Lee County AA	0	0.00	1.45	0.00	15.27	0.00	44.37	0.00	38.90	0.00	0.00	0.00	0.00	0.00	0.00	
Martin County AA	0	0.00	0.00	0.00	11.81	0.00	52.57	0.00	35.61	0.00	0.00	0.00	0.00	0.00	0.00	
Palm Beach County AA	0	0.00	3.13	0.00	32.78	0.00	31.51	0.00	32.58	0.00	0.00	0.00	0.00	0.00	0.00	

<sup>\*</sup> Based on 2002 Peer Mortgage Data (SE) +Based on 2003 Peer Mortgage Data (Eastern)

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

<sup>\*\*\*</sup> Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 1990 Census information. <sup>+++</sup> Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>					
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Miami Dade County AA	175	27.17	8.82	11.43	17.32	10.86	31.73	26.86	42.14	50.86	0.11	0.23	0.07	0.13	0.11	
Sarasota/Manatee Counties AA	109	16.93	0.49	0.92	18.85	24.77	57.07	48.62	23.58	25.69	0.23	1.00	0.32	0.19	0.29	
<b>Limited Review:</b>																
Broward County AA	64	9.94	4.52	1.56	14.92	3.13	50.37	48.44	30.19	46.88	0.07	0.00	0.02	0.07	0.10	
Collier County AA	36	5.59	1.43	0.00	3.92	0.00	57.32	44.44	37.33	55.56	0.10	0.00	0.00	0.09	0.17	
Hillsborough/Pinellas Counties AA	71	11.02	1.40	1.41	17.01	40.85	41.85	30.99	39.56	26.76	0.08	0.14	0.22	0.04	0.06	
Indian River County AA	55	8.54	0.00	0.00	1.61	0.00	42.91	34.55	55.49	65.45	0.74	0.00	0.00	0.78	0.81	
Lee County AA	30	4.66	0.50	0.00	9.42	3.33	76.27	86.67	13.81	10.00	0.08	0.00	0.07	0.10	0.04	
Martin County AA	12	1.86	0.00	0.00	19.60	66.67	44.53	16.67	35.87	16.67	0.07	0.00	0.35	0.00	0.00	
Palm Beach County AA	92	14.29	2.05	9.78	15.78	9.78	43.60	43.48	37.28	36.96	0.11	0.33	0.08	0.11	0.11	

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003									
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>+</sup>					
	#	% of Total <sup>++</sup>	% of Businesses <sup>+++</sup>	% BANK Loans	% of Businesses <sup>+++</sup>	% BANK Loans	% of Businesses <sup>+++</sup>	% BANK Loans	% of Businesses <sup>+++</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Miami-Dade County AA	65	20.57	5.27	10.77	22.49	18.46	32.39	35.38	39.42	35.38	0.08	0.22	0.08	0.10	0.07	
Sarasota/Manatee Counties AA	48	15.19	0.46	0.00	22.41	20.83	53.03	60.42	24.09	18.75	0.20	0.00	0.25	0.24	0.14	
<b>Limited Review:</b>																
Broward County AA	40	12.66	4.23	0.00	23.87	5.00	44.09	42.50	27.81	52.50	0.06	0.00	0.01	0.06	0.11	
Collier County AA	6	1.90	1.96	0.00	11.66	0.00	44.56	33.33	41.83	66.67	0.05	0.00	0.00	0.03	0.07	
Hillsborough/Pinellas Counties AA	33	10.44	2.07	3.03	22.15	30.30	43.80	30.30	31.98	36.36	0.05	0.09	0.07	0.04	0.05	
Indian River County AA	36	11.39	0.00	0.00	1.66	0.00	57.86	33.33	40.47	66.67	0.76	0.00	0.00	0.46	1.23	
Lee County AA	24	7.59	1.16	4.17	15.10	20.83	59.23	45.83	24.51	29.17	0.13	0.63	0.21	0.10	0.15	
Martin County AA	7	2.22	0.00	0.00	22.69	57.14	40.77	28.57	36.53	14.29	0.12	0.00	0.34	0.09	0.05	
Palm Beach County AA	57	18.04	3.91	7.02	23.48	7.02	33.84	38.60	38.63	47.37	0.12	0.25	0.04	0.14	0.14	

<sup>\*</sup> Based on 2002 Peer Small Business Data -- US and PR    <sup>+</sup>Based on 2003 Peer Small Business Data -- US and PR

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

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2002).    <sup>+++</sup> Source Data - Dun and Bradstreet (2003).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Miami Dade County AA	400	20.84	23.32	22.88	16.40	23.73	19.19	5.37	41.09	48.02	0.31	1.95	0.40	0.06	0.30	
Sarasota/Manatee Counties AA	473	24.65	16.01	1.77	20.63	6.40	24.71	7.28	38.65	84.55	0.97	0.20	0.39	0.29	1.63	
<b>Limited Review:</b>																
Broward County AA	204	10.63	19.63	27.18	18.27	18.97	22.51	4.10	39.59	49.74	0.18	0.60	0.09	0.03	0.23	
Collier County AA	173	9.02	17.77	11.24	19.99	4.14	22.95	2.96	39.29	81.66	0.64	0.34	0.26	0.13	1.04	
Hillsborough/Pinellas Counties AA	134	6.98	16.83	8.00	17.85	16.00	22.81	6.40	42.52	69.60	0.14	0.23	0.09	0.02	0.20	
Indian River County AA	132	6.88	10.38	0.77	14.71	3.08	20.35	3.85	54.57	92.31	1.62	0.00	0.43	0.29	2.45	
Lee County AA	187	9.74	16.34	15.59	20.25	5.91	24.98	6.99	38.44	71.51	0.44	1.25	0.03	0.21	0.60	
Martin County AA	33	1.72	14.60	0.00	17.11	6.25	22.18	3.13	46.12	90.63	0.38	0.00	0.29	0.00	0.57	
Palm Beach County AA	183	9.54	18.84	14.94	19.04	14.37	22.59	2.87	39.53	67.82	0.23	0.32	0.13	0.02	0.38	

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share+				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share+					
	#	% of Total++	% Families+++	% BANK Loans++++	% Families+++	% BANK Loans++++	% Families+++	% BANK Loans++++	% Families+++	% BANK Loans++++	% Families+++	% BANK Loans++++	Overall	Low	Mod	Mid
<b>Full Review:</b>																
Miami-Dade County AA	153	19.37	23.00	18.60	16.98	17.83	18.53	3.88	41.50	59.69	0.22	2.64	0.36	0.04	0.20	
Sarasota/Manatee Counties AA	210	26.58	17.68	2.94	19.61	10.78	23.59	7.35	39.12	78.92	0.86	0.43	0.51	0.28	1.26	
<b>Limited Review:</b>																
Broward County AA	83	10.51	20.85	8.86	18.17	18.99	20.48	3.80	40.50	68.35	0.13	0.22	0.13	0.02	0.19	
Collier County AA	73	9.24	19.06	15.07	19.32	5.48	20.65	6.85	40.97	72.60	0.56	1.96	0.20	0.19	0.68	
Hillsborough/Pinellas Counties AA	60	7.59	18.00	12.50	17.81	23.21	21.43	10.71	42.76	53.57	0.10	0.23	0.12	0.04	0.10	
Indian River County AA	59	7.47	11.97	1.72	14.87	1.72	20.93	1.72	52.23	94.83	1.52	1.09	0.19	0.13	2.30	
Lee County AA	64	8.10	17.16	20.63	19.96	12.70	23.32	4.76	39.56	61.90	0.27	1.21	0.20	0.05	0.30	
Martin County AA	18	2.28	14.65	0.00	16.38	11.76	19.87	0.00	49.10	88.24	0.37	0.00	0.38	0.00	0.49	
Palm Beach County AA	70	8.86	19.86	16.42	18.56	20.90	20.60	7.46	40.98	55.22	0.15	0.35	0.16	0.04	0.16	

\* Based on 2002 Peer Mortgage Data (SE) +Based on 2003 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 5.3% of loans originated and purchased by bank. ++As a percentage of loans with borrower income information available. No information was available for 5.6% of loans originated and purchased by bank.

\*\*\* Percentage of Families is based on the 1990 Census information. +++Percentage of Families is based on the 2000 Census information.

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

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share <sup>†</sup>				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>					
<b>Full Review:</b>															
Miami Dade County AA	36	15.93	23.32	3.13	16.40	21.88	19.19	6.25	41.09	68.75	0.42	0.00	0.78	0.11	0.53
Sarasota/Manatee Counties AA	54	23.89	16.01	0.00	20.63	3.92	24.71	9.80	38.65	86.27	1.42	0.00	0.00	0.26	3.61
<b>Limited Review:</b>															
Broward County AA	37	16.37	19.63	5.56	18.27	8.33	22.51	16.67	39.59	69.44	0.53	0.00	0.46	0.12	0.93
Collier County AA	18	7.96	17.77	6.67	19.99	6.67	22.95	6.67	39.29	80.00	1.55	0.98	0.93	0.00	3.65
Hillsborough/Pinellas Counties AA	36	15.93	16.83	2.94	17.85	11.76	22.81	8.82	42.52	76.47	0.42	0.22	0.30	0.14	0.65
Indian River County AA	8	3.54	10.38	0.00	14.71	14.29	20.35	14.29	54.57	71.43	1.52	0.00	0.00	1.82	2.05
Lee County AA	8	3.54	16.34	0.00	20.25	0.00	24.98	0.00	38.44	100.00	0.34	0.00	0.00	0.00	0.80
Martin County AA	5	2.21	14.60	0.00	17.11	0.00	22.18	0.00	46.12	100.00	0.32	0.00	0.00	0.00	0.68
Palm Beach County AA	24	10.62	18.84	0.00	19.04	14.29	22.59	9.52	39.53	76.19	0.63	0.00	0.71	0.17	0.96

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share <sup>†</sup>				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total <sup>**</sup>	% Families <sup>+++</sup>	% BANK Loans <sup>++++</sup>	% Families <sup>+++</sup>	% BANK Loans <sup>++++</sup>	% Families <sup>+++</sup>	% BANK Loans <sup>++++</sup>	% Families <sup>+++</sup>	% BANK Loans <sup>++++</sup>					
<b>Full Review:</b>															
Miami Dade County AA	8	14.81	23.00	12.50	16.98	12.50	18.53	0.00	41.50	75.00	0.32	1.03	0.34	0.00	0.38
Sarasota/Manatee Counties AA	12	22.22	17.68	0.00	19.61	0.00	23.59	9.09	39.12	90.91	0.99	0.00	0.00	0.33	2.11
<b>Limited Review:</b>															
Broward County AA	11	20.37	20.85	0.00	18.17	0.00	20.48	0.00	40.50	100.00	0.45	0.00	0.00	0.00	0.82
Collier County AA	1	1.85	19.06	0.00	19.32	0.00	20.65	0.00	40.97	100.00	0.31	0.00	0.00	0.00	0.68
Hillsborough/Pinellas Counties AA	4	7.41	18.00	0.00	17.81	0.00	21.43	0.00	42.76	100.00	0.05	0.00	0.00	0.00	0.10
Indian River County AA	6	11.11	11.97	0.00	14.87	20.00	20.93	0.00	52.23	80.00	1.81	0.00	2.22	0.00	2.55
Lee County AA	3	5.56	17.16	0.00	19.96	66.67	23.32	33.33	39.56	0.00	0.31	0.00	1.17	0.42	0.00
Martin County AA	1	1.85	14.65	0.00	16.38	0.00	19.87	0.00	49.10	100.00	0.42	0.00	0.00	0.00	0.79
Palm Beach County AA	8	14.81	19.86	12.50	18.56	12.50	20.60	12.50	40.98	62.50	0.45	0.54	0.32	0.21	0.61

<sup>†</sup> Based on 2002 Peer Mortgage Data (SE)    <sup>†</sup> Based on 2003 Peer Mortgage Data (Eastern)

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 7.5% of loans originated and purchased by bank.    <sup>++</sup> As a percentage of loans with borrower income information available. No information was available for 7.4% of loans originated and purchased by bank.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information.    <sup>+++</sup> Percentage of Families is based on the 2000 Census information.

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

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002						Market Share <sup>†</sup>				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Full Review:</b>																
Miami Dade County AA	143	16.44	23.32	1.72	16.40	9.48	19.19	2.59	41.09	86.21	0.12	0.04	0.04	0.01	0.20	
Sarasota/Manatee Counties AA	159	18.28	16.01	0.69	20.63	6.25	24.71	13.89	38.65	79.17	0.34	0.06	0.18	0.17	0.54	
<b>Limited Review:</b>																
Broward County AA	80	9.20	19.63	1.30	18.27	10.39	22.51	6.49	39.59	81.82	0.07	0.02	0.05	0.02	0.12	
Collier County AA	77	8.85	17.77	4.17	19.99	6.94	22.95	9.72	39.29	79.17	0.24	0.00	0.00	0.17	0.44	
Hillsborough/Pinellas Counties AA	103	11.84	16.83	6.45	17.85	13.98	22.81	11.83	42.52	67.74	0.08	0.04	0.06	0.03	0.12	
Indian River County AA	122	14.02	10.38	0.00	14.71	2.61	20.35	5.22	54.57	92.17	2.08	0.00	0.44	0.52	3.10	
Lee County AA	47	5.40	16.34	4.44	20.25	6.67	24.98	2.22	38.44	86.67	0.09	0.09	0.06	0.02	0.13	
Martin County AA	21	2.41	14.60	0.00	17.11	0.00	22.18	4.76	46.12	95.24	0.20	0.00	0.00	0.08	0.32	
Palm Beach County AA	118	13.56	18.84	1.75	19.04	5.26	22.59	6.14	39.53	86.84	0.13	0.05	0.04	0.04	0.25	

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003						Market Share <sup>†</sup>				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Full Review:</b>																
Miami-Dade County AA	116	16.86	23.00	1.04	16.98	5.21	18.53	10.42	41.50	83.33	0.10	0.04	0.04	0.04	0.14	
Sarasota/Manatee Counties AA	144	20.93	17.68	1.48	19.61	5.19	23.59	14.07	39.12	79.26	0.36	0.08	0.10	0.20	0.57	
<b>Limited Review:</b>																
Broward County AA	101	14.68	20.85	1.05	18.17	5.26	20.48	9.47	40.50	84.21	0.10	0.02	0.03	0.04	0.16	
Collier County AA	46	6.69	19.06	0.00	19.32	2.22	20.65	8.89	40.97	88.89	0.23	0.00	0.03	0.09	0.39	
Hillsborough/Pinellas Counties AA	58	8.43	18.00	3.70	17.81	3.70	21.43	9.26	42.76	83.33	0.05	0.04	0.01	0.02	0.08	
Indian River County AA	85	12.35	11.97	0.00	14.87	1.25	20.93	2.50	52.23	96.25	1.43	0.00	0.13	0.17	2.20	
Lee County AA	39	5.67	17.16	0.00	19.96	0.00	23.32	2.78	39.56	97.22	0.12	0.00	0.00	0.01	0.22	
Martin County AA	13	1.89	14.65	0.00	16.38	15.38	19.87	15.38	49.10	69.23	0.16	0.00	0.18	0.11	0.18	
Palm Beach County AA	86	12.50	19.86	3.80	18.56	6.33	20.60	5.06	40.98	84.81	0.11	0.05	0.04	0.02	0.20	

<sup>†</sup> Based on 2002 Peer Mortgage Data (SE) + Based on 2003 Peer Mortgage Data (Eastern)

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 8.4% of loans originated and purchased by bank. ++ As a percentage of loans with borrower income information available. No information was available for 8.0% of loans originated and purchased by bank.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information. +++ Percentage of Families is based on the 2000 Census information.

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

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
MA/Assessment Area:	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Miami Dade County AA	175	27.05	54.92	37.71	48.00	20.00	32.00	0.11	0.20
Sarasota/Manatee Counties AA	109	16.85	63.22	64.22	62.39	23.85	13.76	0.23	0.54
<b>Limited Review:</b>									
Broward County AA	64	9.89	57.50	37.50	42.19	26.56	31.25	0.07	0.11
Collier County AA	36	5.56	60.97	52.78	55.56	25.00	19.44	0.10	0.22
Hillsborough/Pinellas Counties AA	71	10.97	60.74	53.52	56.34	22.54	21.13	0.08	0.13
Indian River County AA	55	8.50	64.69	65.45	52.73	32.73	14.55	0.74	1.91
Lee County AA	30	4.64	62.68	53.33	73.33	16.67	10.00	0.08	0.11
Martin County AA	12	1.85	63.17	25.00	33.33	16.67	50.00	0.07	0.07
Palm Beach County AA	95	14.68	60.43	51.58	51.58	26.32	22.11	0.11	0.15

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share+	
MA/Assessment Area:	#	% of Total++	% of Businesses+++	% BANK Loans++++	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Miami-Dade County AA	67	21.07	60.37	43.28	38.81	29.85	31.34	0.08	0.11
Sarasota/Manatee Counties AA	48	15.09	64.78	50.00	50.00	22.92	27.08	0.20	0.28
<b>Limited Review:</b>									
Broward County AA	40	12.58	62.43	32.50	45.00	20.00	35.00	0.06	0.06
Collier County AA	6	1.89	63.07	50.00	16.67	33.33	50.00	0.05	0.06
Hillsborough/Pinellas Counties AA	33	10.38	61.19	51.52	51.52	24.24	24.24	0.05	0.07
Indian River County AA	36	11.32	65.03	44.44	44.44	30.56	25.00	0.76	0.98
Lee County AA	24	7.55	63.53	29.17	54.17	20.83	25.00	0.13	0.10
Martin County AA	7	2.20	65.89	42.86	71.43	14.29	14.29	0.12	0.16
Palm Beach County AA	57	17.92	63.38	31.58	43.86	26.32	29.82	0.12	0.11

\* Based on 2002 Peer Small Business Data -- US and PR + Based on 2003 Peer Small Business Data -- US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2002). +++ Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2003).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 5.56% of small loans to businesses originated and purchased by the bank.

++++ Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 4.09% of small loans to businesses originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: FLORIDA				Evaluation Period: AUGUST 20, 2001 TO DECEMBER 31, 2004			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Miami Dade County AA	7	857	27	1,177	34	2,034	17.77	1	267
Sarasota/Manatee Counties AA	2	3,924	21	326	23	4,250	37.14	2	87
<b>Limited Review:</b>									
Broward County AA	4	210	13	1,254	17	1,464	12.79	1	61
Collier County AA	0	0	5	39	5	39	0.34	1	51
Hillsborough/Pinellas Counties AA	3	146	13	260	16	406	3.55	1	25
Indian River County AA	0	0	7	714	7	714	6.24	2	225
Lee County AA	0	0	3	22	3	22	0.19	1	39
Martin County AA	0	0	5	23	5	23	0.20	1	11
Palm Beach County AA	4	240	15	2,252	19	2,492	21.78	1	82

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

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



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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		
Geography: FLORIDA																		
Evaluation Period: AUGUST 20, 2001 TO DECEMBER 31, 2002																		
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Full Review:</b>																		
Miami Dade County AA	41.48	5	17.24	0.00	0.00	40.00	60.00	0	0	0	0	0	0	0	9.18	19.43	39.47	31.91
Sarasota/Manatee Counties AA	14.45	5	17.24	0.00	40.00	40.00	20.00	0	0	0	0	0	0	0.83	18.21	59.69	21.27	
<b>Limited Review:</b>																		
Broward County AA	7.85	3	10.34	0.00	0.00	33.33	66.67	0	0	0	0	0	0	3.25	18.55	54.95	23.17	
Collier County AA	8.43	2	6.9	0.00	0.00	50.00	50.00	0	0	0	0	0	0	5.23	10.56	59.09	25.11	
Hillsborough/Pinellas Counties AA	4.32	3	10.34	0.00	33.33	33.33	33.33	0	0	0	0	0	0	2.67	16.29	46.82	34.03	
Indian River County AA	5.63	3	10.34	0.00	0.00	0.00	100.00	1	0	0	0	0	+1	0.00	4.87	42.27	52.86	
Lee County AA	4.99	3	10.34	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.29	15.17	73.72	9.82	
Martin County AA	1.58	1	3.45	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	7.44	57.30	35.26	
Palm Beach County AA	11.26	4	13.79	0.00	25.00	25.00	50.00	0	0	0	0	0	0	3.05	21.73	46.83	28.15	

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		
Geography: FLORIDA																		
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2004																		
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography				
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Full Review:</b>																		
Miami-Dade County AA	40.35	5	18.52	0.00	0.00	40.00	60.00	0	0	0	0	0	0	4.89	28.61	35.68	30.79	
Sarasota/Manatee Counties AA	13.09	4	14.81	0.00	0.00	50.00	50.00	0	1	0	0	-1	0	0.67	25.18	52.78	21.37	
<b>Limited Review:</b>																		
Broward County AA	9.25	3	11.11	0.00	0.00	0.00	100.00	0	0	0	0	0	0	3.34	26.66	43.13	26.88	
Collier County AA	7.77	2	7.41	0.00	0.00	0.00	100.00	0	0	0	0	0	0	7.48	18.77	45.24	28.51	
Hillsborough/Pinellas Counties AA	3.80	3	11.11	0.00	66.67	0.00	33.33	0	0	0	0	0	0	2.93	19.93	45.92	31.22	
Indian River County AA	5.95	2	7.41	0.00	0.00	0.00	100.00	0	1	0	0	0	-1	0.00	4.54	57.08	38.38	
Lee County AA	5.85	3	11.11	0.00	0.00	66.67	33.33	0	0	0	0	0	0	1.95	17.89	61.13	19.03	
Martin County AA	1.62	1	3.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	14.20	45.62	40.18	
Palm Beach County AA	12.32	4	14.81	0.00	0.00	0.00	100.00	0	0	0	0	0	0	4.21	29.32	33.88	32.37	

