



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**City National Bank Of Florida
Charter Number: 15977**

**25 West Flagler Street
Miami, FL 33130**

Office of the Comptroller of the Currency

**South Florida Field Office
9800 Northwest 41st Street Suite 120
Miami, FL 33178**

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 **Outstanding**.

The following table indicates the performance level of **City National Bank Of Florida** with respect to the lending, investment, and service tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			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 levels that reflect good responsiveness to meeting the credit needs of the bank’s assessment areas.
- An excellent percentage of the bank’s loan originations are within its assessment areas.
- Excellent geographic distribution of loans.
- Excellent distribution of loans by income level of the borrower.
- Excellent performance for CD lending, which addressed difficult to meet credit needs.
- Excellent level of CD investments, given available CD opportunities.
- Retail delivery systems are accessible to geographies and individuals of different income levels.
- A good level of CD services.

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 statistical 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: 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 statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of 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 statistical area (PMSA), metropolitan statistical area (MSA), or consolidated metropolitan area (CMSA), 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

City National Bank of Florida (**CNB**), chartered in 1970, is the result of a consolidation of affiliated banks having a history of operations in Dade County dating back to 1946. CNB is wholly-owned by City National Bancshares, Inc., a bank holding company which is headquartered in Miami, Florida. The holding company, in turn, is 99% owned by Leonard Abess, Jr. and family. The bank has one affiliate, City National Corporation, which is 100% owned by the holding company. The affiliate is not active. CNB is an intrastate financial institution.

The bank's main office is located in downtown Miami, Florida where it began operations. CNB expanded into Broward County in 1977 and into Palm Beach County in 1999. Twelve branches are in Dade County, the largest of the three counties. Three branches are in Broward County and two branches are in Palm Beach County. Most of the branches in Dade County are concentrated in the eastern portions of the county.

CNB offers a full range of traditional loan products and deposit services. While the bank offers home mortgage and consumer lending, its strategic focus is commercial real estate lending, corporate cash management and private banking. CNB is one of ten banks in the Miami MSA that participates in the Miami-Dade Housing Agency surtax program, which provides affordable housing for low- and moderate-income individuals.

As of September 30, 2002, CNB had total assets of \$2.0 billion as compared to \$1.9 billion a year earlier. The major categories of the bank's \$1.4 billion loan portfolio were as follows: 4% to individuals; 17% for commercial real estate; 62% for commercial and industrial; 15% for 1-4 family residential; and 2% other loans. The percent of the bank's total assets represented by net loans was 70%. The loan to deposit ratio was 93%. Tier One Capital was \$175 million or 8.78% of total assets.

There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs of its assessment areas. CNB's CRA performance was rated "Satisfactory" in the last public evaluation dated June 21, 1999.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending, Investment and Service Tests. In evaluating the bank's lending performance, we reviewed residential mortgage loans subject to filing under HMDA, small loans to businesses and CD loans.

With the exception of community development (CD) loans, the evaluation period for the Lending Test is January 1, 1999 through December 31, 2001. For CD loans, the Investment Test and the Services Test, the evaluation period is January 1, 1999 through January 6, 2003.

Data Integrity

This evaluation is based on accurate data. As part of this CRA evaluation, we relied upon management's internal review. CD loans, investments and services submitted by CNB management were verified to ensure that they met the regulatory definition for community development. Some items submitted by CNB for consideration were excluded from this evaluation because they did not meet the definition or purpose of community development.

Selection of Areas for Full-Scope Review

The bank has three assessment areas (AA), the Miami MSA, the Fort Lauderdale MSA and the West Palm Beach MSA. The Miami MSA received a full-scope review while the Fort Lauderdale and West Palm Beach MSAs received limited scope reviews. The bank's overall rating is based primarily on the results of the Miami MSA, which is the most significant market in which the bank operates. The Miami MSA provides 79% of the bank's deposits and it is where 78% of the bank's loans are made. CNB is a recent entrant into the West Palm Beach MSA and its presence is limited to two branches in the assessment area. The delineation of the AAs did not reflect any illegal discrimination and did not arbitrarily exclude low- or moderate-income geographies.

Ratings

The bank's overall rating is based primarily on the area receiving the full-scope review. Since the bank's strategic focus is business lending, loans to small businesses are more heavily weighted than home mortgage loans. No small farm loans were made during this evaluation period.

Other

Community credit needs of the assessment area were determined by reviewing recent community contacts conducted by federal bank regulators in connection with previous CRA examinations. In addition, a review was made of the U.S. Department of Housing and Urban Development (HUD) 5-year Consolidated Plan from 1999 to 2004 for the Miami MSA. These

HUD Consolidated Plans are comprehensive reports that identify community credit needs and community development opportunities. We conducted a community contact with a non-profit organization whose mission was to foster economic development in the poorest sections of the full-scope AA.

The most critical identified credit need for the Miami MSA is affordable single and multi-unit housing units for low- and moderate-income individuals. Loans for rehabilitation of existing properties in poor neighborhoods was also an identified need.

Fair Lending Review

An analysis of the most recent public comments, consumer complaint information and HMDA and small business lending was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in June of 1999.

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 "Outstanding". Based on a full-scope review, the bank's performance in the full-scope assessment area (AA) is excellent.

Lending Activity

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

The bank's lending activity reflects good responsiveness to the credit needs of its full-scope AA. Based on 2001 aggregate data, CNB had small a business market share of 2.10% in the full-scope AA, which was near to CNB's 2.52% deposit market share in the full-scope AA. CNB's market share of HMDA loans in the full-scope AA was .14%, which was lower than the bank's market share.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of loans throughout the full-scope AA is excellent. The geographic distribution of HMDA loans is excellent. The geographic distribution of small loans to businesses is excellent.

Home Mortgage Loans

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 loan originations and purchases.

Overall, the geographic distribution of HMDA loans is excellent. Home purchase loans, representing 72% of HMDA products by number, carry the most weight. The bank originated a relatively small number of home improvement and multifamily loans in the full-scope AA. Consequently, a geographical analysis of home improvement and multifamily loans is not meaningful.

The geographic distribution of *home purchase loans* is excellent. The percentage of home mortgage loans in low-income geographies exceeds the percentage of owner-occupied units in these geographies. The percentage of home purchase loans in moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. The bank's market share of home purchase loans in low-income geographies exceeds their overall market share. The bank's market share of home purchase loans in moderate-income geographies exceeds their overall market share.

The geographic distribution of *refinanced loans* is excellent. The percentage of refinanced loans in low-income geographies is near to the percentage of owner-occupied units in these geographies. The percentage of refinanced loans in moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. The bank's market share of refinanced loans in low-income geographies exceeds their overall market share. The bank's market share of refinanced loans in moderate-income geographies exceeds their overall market share.

Small Loans to Businesses

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loan to businesses in the full-scope AA is excellent. The percentage of small loans to businesses in low-income geographies exceeds the percentage of businesses in these geographies. The percentage of small loans to businesses in moderate-income geographies is near to the percent of businesses in these geographies. The bank's market share of small loans to businesses in low-income geographies exceeds their overall market share. The bank's market share of small loans to businesses in moderate-income geographies exceeds their overall market share.

Lending Gap Analysis

No unexplained, conspicuous gaps in lending were identified. We evaluated the lending distribution in the full-scope AA to determine if any unexplained conspicuous gaps existed. We reviewed lending reports detailing the volume of HMDA and small loans to businesses in low- and moderate-income geographies. This performance had a positive effect on the bank's overall geographic distribution analysis.

Inside/Outside Ratio

A substantial majority of the bank's loan originations is within its three defined assessment areas. Overall, 98% of CNB's loan originations are within its three AAs. By loan product, 99% of HMDA loans and 98% of small loans to businesses were inside the AAs. This analysis was performed on the entire bank rather than on individual AAs. This performance had a positive effect on the bank's overall geographic distribution analysis.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of the borrower throughout the full-scope AA is excellent. The distribution of HMDA loans is excellent. The distribution of small loans to businesses is excellent.

Home Mortgage Loans

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 loan originations and purchases.

Overall, the distribution of HMDA loans by borrower income level is excellent.

The distribution of *home purchase loans* is excellent. The bank's percentage of home purchase loans to low-income borrowers is somewhat lower than the percentage of low-income families that live in the full scope AA. The bank's percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families that live in the full scope AA. The bank's market share to low-income borrowers exceeds their overall market share. The bank's market share to moderate-income borrowers exceeds their overall market share.

The distribution of *refinanced loans* is excellent. The bank's percentage of refinanced loans to low-income borrowers is somewhat lower than the percentage of low-income families that live in the full scope AA. The bank's percentage of refinanced loans to moderate-income borrowers exceeds the percentage of moderate-income families that live in the full scope AA. The bank's market share to low-income borrowers exceeds their overall market share. The bank's market share to moderate-income borrowers exceeds their overall market share.

Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of small loans to businesses throughout the full-scope AA is excellent. The bank's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) exceeds the percentage of small businesses in the full scope AA. The bank's market share of small loans to small businesses exceeds their overall market share of small loans to all businesses. A majority of the bank's loans to small businesses is for amounts of \$100 thousand or less.

Community Development Lending

Refer to Table 1 in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

Community development lending performance throughout the full-scope AA is excellent. In addition to originating a high number and dollar volume of CD loans, these loans addressed difficult to meet credit needs within the full-scope AA.

During the evaluation period, CNB originated 23 CD loans totaling \$70.9 million in the full-scope AA. The majority of CD loans supported affordable housing loans for low- and moderate-income individuals, a primary credit need in the AA. Proceeds from 21 CD loans totaling \$69.6 million were used to purchase, refinance, or improve more than 2,011 multi- or single- family housing units targeted for low- and moderate-income individuals. Affordable

housing CD loans for low- and moderate-income people represented 91% of total CD loans by number and 98% by dollar amount. The dollar volume of CD loans in the full-scope AA represented 51.3% of pro-rated Tier 1 capital as of September 30, 2002.

Other Loan Data: In addition to the \$70.9 million in CD loans originated during the evaluation period, the bank also issued eight letters of credit to guarantee performance of \$48.8 million in construction loans for projects targeted for low- and moderate-income individuals.

Product Innovation and Flexibility

CNB offers a proprietary lending program with flexible underwriting standards. This program is listed below and is not considered innovative. Production numbers cover the entire evaluation period.

- *CitySmart Community Mortgage Program – 46 loans - \$2,999,300* - Proprietary program designed by the bank. This loan product is designed for low- and moderate-income individuals. Flexible terms include no credit scoring or private mortgage insurance, 5% down payment, no restrictions on using grant money or gifts to help pay closing costs, less cash to close (approximately 2% of purchase price of property). The homebuyer must participate in, and successfully complete, an approved home ownership counseling program. This program is available in all three AAs.

CNB is also working with the Dade County Commissioners and the Association of Community Organizations for Reform Now (ACORN) to develop a residential loan program to help low- and moderate-income individuals refinance out of predatory loans. The program uses the CitySmart loan requirements as a base and provides closing assistance money of up to \$2,000 (funded by CNB). In November 2002, CNB closed the first two loans under this program. This program is offered only in the full-scope AA.

CNB also participates in the Metro-Dade Housing Agency Surtax Loan Program where the bank partners with the Metro-Dade Housing Agency by making loans with flexible terms to low- and moderate-income individuals. Flexible terms include subsidized down payments, low interest rate second mortgages, and 3% down payments. During this evaluation period, CNB made 69 surtax loans totaling \$4,614,803. This program is offered in the full-scope AA only.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the bank's performance under the Lending Test in the Fort Lauderdale and West Palm Beach MSAs is not inconsistent with the bank's overall "Outstanding" Lending Test rating. Refer to Tables 1 through 12 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "Outstanding". Based on available opportunity for CD investments within its full-scope AA, the bank's performance is excellent. The dollar volume of CD investments in the full-scope AA is high at 5.8% of pro-rated Tier 1 Capital. CD investments also have a positive impact on the community because they help meet a defined credit need.

Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Current Period Investments: During the evaluation period, the bank originated 5 CD investments in the full-scope AA totaling \$4.6 million (or 3.4% of pro-rated Tier I capital). In addition, the impact of investments on the community is high. All five of these investments addressed the identified need of affordable housing for low- and moderate-income individuals. All investments were government guaranteed securities backed by mortgages on properties occupied by low- and moderate- income individuals. The three government agencies guaranteeing these affordable housing securities are the Federal National Mortgage Association (FNMA), Government National Mortgage Association (GNMA) and the Federal Home Loan Mortgage Corporation (FHLMC). Proceeds from the bank's bond investments were responsible for constructing, refinancing, or improving affordable housing units for low- and moderate-income individuals in the full-scope AA. This represented a positive impact within the bank's assessment area.

Current Period Grants and Donations: During this evaluation period, the bank originated grants and donations to 16 CD organizations in the full-scope AA totaling \$88,000. These grants were to organizations that had as their primary mission affordable housing for low- and moderate-income individuals, economic development by financing small businesses, and services to low- and moderate-income people.

Prior Period Investments: Prior to this evaluation period, five investments with a current book value totaling \$3.4 million were made in the full-scope AA. These investments remain outstanding. Three of these investments totaling \$3.3 million are Housing Finance Bonds issued by Dade County and the State of Florida to finance affordable housing projects for low- and moderate-income individuals. The residents of these buildings continue to be impacted in a positive way. Other prior period investments include a \$25,000 certificate of deposit with a minority owned bank that used the deposit to help fund micro-enterprises in low- and moderate-income geographies. The bank's deposit continues to be leveraged to make loans to very small businesses, which provides positive, continuing impact on the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Fort Lauderdale and West Palm Beach MSAs is not inconsistent with the bank's overall

“Outstanding” Investment Test rating. 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 the full-scope review, the bank’s performance in the full-scope AA is good.

Retail Banking Services

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.

The bank’s delivery systems are accessible to different geographies and different income levels within its full-scope AA. The bank’s percentage of branches and ATMs in low-income geographies exceed the percentage of the population residing in low-income geographies. There are no branches located in moderate-income geographies. However, four branches located in middle- or upper-income geographies are located in close proximity to low- or moderate-income geographies, affording residents of moderate-income geographies access to the bank’s delivery systems.

The bank’s record of opening and closing branches in the full-scope AA had a neutral impact on the accessibility of its delivery systems. During the evaluation period, no branches were opened or closed in the full-scope AA.

The bank offers a wide range of banking products and services throughout its full-scope AA. The products, services and business hours are reasonable and do not vary from one location to another.

Alternative delivery systems increase the effectiveness of delivering retail banking services to low- and moderate-income geographies and low- and moderate-income individuals. These alternative delivery system include the following:

- An on-site teller facility at the Fontainebleau Hotel in Miami Beach so that mostly low-income employees can cash their payroll checks. This is a free service for employees that do not qualify for, or are unwilling to open, a banking account. Approximately 600 employees use this service every two weeks.
- A product called PayDay Card, which is offered to commercial customers that employ large numbers of individuals that cannot, or are unwilling to, open a banking account. The payroll amount is loaded in the card and the employee can access their pay at an automated teller machine (ATM) or use it for point-of-sale transactions. The majority of employees using this service are low- and moderate-income individuals.

Community Development Services

Based on the number of CNB employees participating and number of organizations benefiting, the level of community development services provided in the full-scope AA is good. Seventeen directors, officers and employees provided financial services to 27 qualified CD organizations. The types of services provided are not innovative in nature, but are responsive to the needs of the community. The following is a list of the financial services provided to qualified community development organizations during this evaluation period:

- CNB directors, officers and employees serve as board members, presidents, vice presidents, treasurers, or members of 24 organizations that provide affordable housing or community development services to low- and moderate-income individuals; and
- CNB directors, officers and employees serve as members or on loan committees for three organizations that provide economic development by financing small business loans or that stabilize or revitalize low- or moderate-income geographies.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Fort Lauderdale and West Palm Beach MSAs is not inconsistent with the bank's overall "High Satisfactory" performance under the Service Test.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan 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”).

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/99 to 12/31/01 Investment and Service Tests and CD Loans: 01/01/99 to 01/06/03	
Financial Institution	Products Reviewed	
City National Bank of Florida Miami, Florida	HMDA, Small Business and CD Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Miami MSA #5000	Full-Scope	
Fort Lauderdale MSA #2680	Limited-Scope	
West Palm Beach MSA #8960	Limited-Scope	

Appendix B: Market Profiles for Full-Scope Areas

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**Market Profiles for Areas Receiving Full-Scope Reviews
Miami MSA**

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Miami MSA

Demographic Information for Full Scope Area: Miami MSA						
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
Business by Geography	200,697	8.82	17.32	31.73	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 2001 Households Below Poverty Level		31,113 48,200 17.62%	Median Housing Value Unemployment Rate (1990 US Census)	100,570 3.87%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 US Census and 2001 HUD updated MFI

The bank has designated all of the Miami MSA as one of its three assessment areas. Miami MSA's economy is diverse. Major industries include real estate development, trade business with Latin America, tourism, and banking. The Miami MSA's airports and seaports are among the fastest growing in the United States. There are many service businesses in the area. In the extreme southern section of Miami MSA, agriculture is a major industry (e.g. tomatoes, citrus, and other vegetables).

The area has a large retiree population and a growing number of immigrants from Latin America and the Caribbean. Many residents of the area have moved here from northern cities of the United States and Canada, and others maintain second homes in the area. Luxury residences and wealthy individuals characterize the coastal communities of the area.

The Miami MSA is Florida's largest metropolitan area and most populous with approximately 2 million people in a nearly 2,000 square mile area. Density in urban areas is increased by the fact that a significant portion of the county is uninhabitable wetlands. It is also the fourth poorest of large metropolitan areas in the United States. According to a Metro-Dade study, 40% of the Greater Miami community either: lives in poverty; is under employed; is less educated than the national average; or is classified medically indigent.

Housing costs in the Miami MSA remain high. According to 1990 census data, the medium housing value was \$100,570. This high cost of housing has placed the unsubsidized purchase of an average single-family residence beyond the financial means of many individuals classified as low- and moderate-income. Then number of

people living in poverty is outpacing the percent of population growth. From 1980 to 2000, the population in Miami, the largest city in the Miami MSA, increased 7% while the percent of people living in poverty increased 60%.

Competition within the bank's assessment area is intense. FDIC data as of June 30, 2001 showed 566 financial institutions in the Miami MSA.

Appendix C: Tables of Performance Data

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 loan to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration.
- 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, tracked, and recorded by the bank's financial reporting system.

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.

Institution ID: 1000015977 CITY
NATIONAL BANK OF FL

Table 1. Lending Volume

LENDING VOLUME		Geography: MIAMI MSA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001				
MA/Assessment Area (2001):	% 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)	
Full Review:												
Miami MSA	66.02	316	54,413	553	122,729	0	0	23	70,935	892	248,077	79.34
Limited Review:												
Fort Lauderdale MSA	25.39	208	28,201	128	34,528	0	0	7	34,411	343	97,140	14.85
West Palm Beach MSA	8.59	75	10,291	40	10,251	0	0	1	3,760	116	24,302	5.81

* Loan Data as of December 31, 2001. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From July 01, 1999 to January 06, 2003.

*** Deposit Data as of June 30, 2002. 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 2001			Geography: MIAMI MSA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp	
Full Review:																
Miami MSA	229	49.67	3.26	5.24	12.86	19.21	40.83	39.74	43.05	35.81	0.14	0.18	0.16	0.17	0.11	
Limited Review:																
Fort Lauderdale MSA	176	38.18	1.11	0.57	14.39	19.32	58.85	60.80	25.64	19.32	0.09	0.00	0.21	0.09	0.06	
West Palm Beach MSA	56	12.15	0.94	0.00	20.87	26.79	46.30	50.00	31.90	23.21	0.03	0.00	0.00	0.04	0.02	

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT 2001			Geography: MIAMI MSA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	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						
Full Review:																
Miami MSA	1	50.00	3.26	0.00	12.86	0.00	40.83	0.00	43.05	100.00	0.03	0.00	0.00	0.00	0.06	
Limited Review:																
Fort Lauderdale MSA	0	0.00	1.11	0.00	14.39	0.00	58.85	0.00	25.64	0.00	0.00	0.00	0.00	0.00	0.00	
West Palm Beach MSA	1	50.00	0.94	0.00	20.87	0.00	46.30	0.00	31.90	100.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

OF FLORIDA

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 31, 2001			Geography: MIAMI MSA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER						
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	Over all	Low	Mod	Mid	Upp
Full Review:															
Miami MSA	84	63.16	3.26	2.38	12.86	22.62	40.83	29.76	43.05	45.24	0.10	0.18	0.15	0.08	0.10
Limited Review:															
Fort Lauderdale MSA	31	23.31	1.11	0.00	14.39	16.13	58.85	51.61	25.64	32.26	0.04	0.00	0.09	0.03	0.03
West Palm Beach MSA	18	13.53	0.94	0.00	20.87	27.78	46.30	22.22	31.90	50.00	0.03	0.00	0.09	0.02	0.03

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

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

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

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Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: MIAMI MSA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
Miami MSA	2	66.67	13.42	50.00	21.25	50.00	36.01	0.00	29.33	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
West Palm Beach MSA	0	0.00	2.23	0.00	24.05	0.00	36.34	0.00	37.37	0.00	0.00	0.00	0.00	0.00	0.00	
Fort Lauderdale MSA	1	33.33	1.36	0.00	15.78	0.00	58.91	0.00	23.95	100.00	0.26	0.00	0.00	0.00	1.25	

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

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Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES 31, 2001			Geography: MIAMI MSA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER						
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Miami MSA	553	76.70	8.82	18.63	17.32	15.91	31.73	29.29	42.14	36.17	0.26	0.67	0.27	0.26	0.22
Limited Review:															
Fort Lauderdale MSA	128	17.75	4.52	12.50	14.92	20.31	50.37	42.19	30.19	25.00	0.06	0.09	0.05	0.06	0.08
West Palm Beach MSA	40	5.55	2.05	5.26	15.78	2.63	43.60	28.95	37.28	63.16	0.04	0.26	0.02	0.03	0.04

* Based on 2001 Peer Small Business Data: US&PR.

** 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.

*** Source Data - Dun and Bradstreet (2002).

OF FLORIDA

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 2001		Geography: MIAMI MSA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
Miami MSA	229	49.67	23.32	13.96	16.40	39.19	19.19	13.51	41.09	33.33	0.16	0.67	0.48	0.07	0.09	
Limited Review:																
Fort Lauderdale MSA	176	38.18	19.63	30.41	18.27	48.54	22.51	6.43	39.59	14.62	0.10	0.45	0.15	0.05	0.03	
West Palm Beach MSA	56	12.15	18.84	22.22	19.04	64.81	22.59	1.85	39.53	11.11	0.03	0.06	0.11	0.00	0.01	

* Based on 2001 Peer Mortgage Data: Southeast Region 1.

** As a percentage of loans with borrower income information available. No information was available for 3.04% of loans originated and purchased by CNB.

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

**** 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.

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Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 2001		Geography: MIAMI MSA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,							
MA/Assessment Area:	Total Home Improvement 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 ^{****}	Over all	Low	Mod	Mid	Upp
Full Review:															
Miami MSA	1	50.00	23.32	0.00	16.40	0.00	19.19	0.00	41.09	100.00	0.03	0.00	0.00	0.00	0.06
Limited Review:															
Fort Lauderdale MSA	0	0.00	19.63	0.00	18.27	0.00	22.51	0.00	39.59	0.00	0.00	0.00	0.00	0.00	0.00
West Palm Beach MSA	1	50.00	18.84	0.00	19.04	0.00	22.59	0.00	39.53	100.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2001 Peer Mortgage Data: Southeast Region 1.

^{**} As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated and purchased by CNB.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} 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.

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Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE 31, 2001		Geography: MIAMI MSA								Evaluation Period: JANUARY 1, 1999 TO DECEMBER					
MA/Assessment Area:	Total Home Mortgage Refinance 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 ^{****}	Over all	Low	Mod	Mid	Upp
Full Review:															
Miami MSA	84	63.16	23.32	10.98	16.40	30.49	19.19	12.20	41.09	46.34	0.12	0.27	0.23	0.06	0.10
Limited Review:															
Fort Lauderdale MSA	31	23.31	19.63	16.67	18.27	40.00	22.51	3.33	39.59	40.00	0.04	0.16	0.08	0.00	0.04
West Palm Beach MSA	18	13.53	18.84	44.44	19.04	27.78	22.59	11.11	39.53	16.67	0.04	0.24	0.03	0.03	0.01

^{*} Based on 2001 Peer Mortgage Data: Southeast Region 1.

^{**} As a percentage of loans with borrower income information available. No information was available for 2.26% of loans originated and purchased by CNB.

^{***} Percentage of Families is based on the 1990 Census information.

^{****} Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

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Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES 31, 2001		Geography: MIAMI MSA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% 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
Full Review:									
Miami MSA	553	76.70	54.92	62.21	51.54	20.43	28.03	0.26	0.44
Limited Review:									
Fort Lauderdale MSA	128	17.75	57.50	56.25	42.19	23.44	34.38	0.06	0.09
West Palm Beach MSA	40	5.55	60.43	80.00	45.00	25.00	30.00	0.04	0.08

* Based on 2001 Peer Small Business Data: US&PR.

** 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&B - 2002).

**** 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 0.55% of small loans to businesses originated and purchased by the bank.

OF FLORIDA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MIAMI MSA				Evaluation Period: JANUARY 1, 1999 TO JANUARY 6, 2003			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Miami MSA	5	3,393	21	4,672	26	8,065	48.81	0	0
Limited Review:									
Fort Lauderdale MSA	0	0	13	4,398	13	4,398	26.61	0	0
West Palm Beach MSA	1	2,000	6	2,062	7	4,062	24.58	0	0

* 'Prior Period Investments' means investments made in a previous evaluation 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.

OF FLORIDA

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: MIAMI MSA				Evaluation Period: JANUARY 1, 1999 TO JANUARY 6, 2003					
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
Full Review:																	
Miami MSA	79.34	12	70.59	33.33	0.00	33.33	33.34	0	0	0	0	0	0	9.18	19.43	39.47	31.91
Limited Review:																	
Fort Lauderdale MSA	14.85	3	17.65	33.33	0.00	33.33	33.34	1	0	0	0	0	+1	3.25	18.55	54.95	23.17
West Palm Beach MSA	5.81	2	11.76	0.00	0.00	0.00	100.00	2	0	0	0	0	+2	3.05	21.73	46.83	28.15