



Comptroller of the Currency
Administrator of National Banks

LARGE BANK

PUBLIC DISCLOSURE

November 1, 1999

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Eastern National Bank
Charter Number 15748**

**799 Brickell Plaza
Miami, Florida 33131**

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NOTE: **This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.**

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GENERAL INFORMATION

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **Eastern National Bank (ENB)** prepared by the **Office of the Comptroller of the Currency**, the institution's supervisory agency, as of November 1, 1999. The agency evaluates performance in assessment areas, as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

Community Development (CD) - Affordable 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.

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

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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 applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

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

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

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States 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 Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

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

Upper-Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

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

The following table indicates the performance level of **Eastern National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	Eastern National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
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:

W Lending Test

- C Responsiveness in meeting credit needs is adequate.
- C The overall distribution of loans by income level of the geography was adequate.
- C The overall distribution of loans by borrower income level was adequate.
- C The bank did not use innovative or flexible lending programs.

W Investment Test

- C The level of qualified investments given available opportunities was adequate.

W Service Test

- C ENB-s service delivery systems are reasonably accessible to geographies and individuals of different income levels.
- C The bank provided an adequate level of CD services given the opportunities in its AA.

Description of Institution

Eastern National Bank (**ENB**) is an intrastate commercial bank headquartered in downtown Miami, Florida. The bank operates five banking offices throughout Dade County. Four branches are located in upper-income geographies and one in a middle-income geography. The bank's lending activities are centered in commercial, commercial real estate and international trade finance.

As of September 30, 1999, ENB had total assets of \$313 million. Loans totaled \$223 million with the following major categories: 30% under other real estate loans; 29% financial institution loans; 18% commercial and industrial loans; 9% construction and development, and; 7% 1-4 family residential loans. Risk-based Tier 1 capital of \$25 million was 11.25%.

Competition in the AA is very strong. According to the Federal Deposit Insurance Corporation (FDIC) market share report dated June 30, 1998, there were 72 FDIC-insured financial institutions operating 543 offices among them, in the AA. The combined deposits of these institutions totaled \$36 billion. ENB ranked twenty-second with a deposit market share of 1%.

In its 1997 - 2001 Corporate Strategic Plan, ENB defines its current target market as entrepreneurs and professionals with a gross annual income of at least \$75 thousand. Business loans related to this group include commercial lines of credit, commercial mortgages, real estate acquisition, development and construction, and Small Business Administration loans. ENB offers home purchase, home improvement, home equity lines of credits and other personal loans as accommodation to its existing customers. Its commercial loans include working capital for wholesale, retail or manufacturing purposes.

There were no legal, financial or other factors that impeded the bank's ability to help meet the credit needs in its AA during the assessment period. The bank was rated **Satisfactory** at the preceding CRA examination, dated December 27, 1996.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This examination covers ENB's performance from January 1, 1997 to December 31, 1998. For the lending test, we reviewed the bank's HMDA and small business loans. The bank made no loans to small farms. At the bank's option, consumer loans were not considered in our analysis. Under the investment and service tests, we considered all relevant activities up to September 30, 1999.

Data Integrity

We performed a data integrity review of 1997 and 1998 HMDA and small business loans for accuracy. We noted material errors in the HMDA and small business loan data which required the bank to correct. Our analysis is based on the corrected loan data.

Selection of Areas for Full-Scope Review

The Miami MSA received a full-scope review and ratings are based on results of this full scope review. There were no limited scope reviews. Refer to the table in Appendix A for more detailed information.

Ratings

The bank's overall rating is based on the one area that received a full-scope review. We reviewed small business and home mortgage loans to assess the bank's lending performance. We gave more weight to small business lending as this is the core of the bank's lending activities. Since the bank made no small farm loans, this section is not discussed. In our analysis, we limited our use of the market share information (from the 1997 HMDA and Small Business Aggregate Data) because the numbers were based on the prior inaccurate data provided by the bank. We used the bank's overall loan market rank only to provide a perspective with regard to ENB's deposit market rank within the AA and the extent of its lending activity. We directed our analysis mainly to the bank's lending performance in relation to the demographic information.

Fair Lending Review

A technical review of fair lending was conducted during the evaluation using the OCC's large bank fair lending examination guidelines and the alternative fair lending procedures. Due to the bank's small volume of denied residential mortgage loans, we were unable to construct a sample for a comparative file analysis of approved and denied files.

Using alternative fair lending analysis procedures, we reviewed a sample of eighteen diverse application files for compliance with sections 202.6 and 202.7 of Regulation B.

No exceptions were identified.

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 **ALow Satisfactory.** Based on a full-scope review, the bank's performance in the Miami MSA is adequate.

Lending Activity

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

Loans originated during the evaluation period reflected adequate responsiveness in meeting identified credit needs within the bank's AA. ENB's HMDA lending activity was adequate considering the bank's market presence and its small residential real estate portfolio. Individual HMDA loan product market rank was significantly lower than the bank's deposit market rank. ENB's small business lending activity was excellent. The bank ranked twenty-one among one hundred twenty-two small business lenders in the AA. This exceeded the bank's deposit market rank of twenty-two, among the financial institutions in Dade County.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of HMDA and small business loans throughout the bank's AA is adequate. There were no conspicuous or unexplainable lending gaps.

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

The bank's geographic distribution of HMDA loans was poor.

The bank's geographic distribution of home purchase and home refinance loans is very poor. ENB made no home purchase or home refinance loans in low- or moderate-income geographies. The bank's

primary lending focus is business loans. The geographic distribution of home improvement loans is good. The bank's lending in low-income geographies equals the percentage of owner-occupied units in those areas. The bank's lending in moderate-income geographies also equals the percentage of owner-occupied units in those areas.

Small Business Loans

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations.

The bank's geographic distribution of small business loans was good.

The bank's lending to small businesses in low-income geographies was near the percentage of small businesses in those areas. The bank's lending to small business in moderate-income geographies is also near the percentage of small businesses in those geographies.

In/Out Ratio

ENB made a substantial majority of its loans in its assessment area. During the assessment period, 95% of its loans were within the bank's assessment area. By loan product, the percent of loans inside the bank's assessment area were 85% for HMDA and 97% for small business.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by borrower income level was adequate. The distribution of HMDA loans by borrower income is adequate. The distribution of loans to small businesses is adequate. Small loans to businesses is good.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

The distribution of HMDA loans by income level of the borrower is poor.

The distribution of home purchase and home refinance loans by income level of the borrower is very poor. The bank made no home purchase or home refinance loans to low- or moderate-income individuals. The bank's primary lending focus is business loans. The distribution of home improvement loans by income level of the borrower is adequate. The portion of loans made to low-income borrowers

was significantly lower than the percentage of low-income families. The portion of loans made to moderate-income borrowers equals the percentage of such families.

Small Business Loans

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

The distribution of small business loans by income level is adequate.

The bank's distribution of loans to small businesses with revenues \$1 million or less is adequate. The bank's percent of loans to small businesses was lower than the percent of businesses in the assessment area that were small. A majority of the bank's loans made to businesses (regardless of revenue) were in amounts of \$100,000 or less.

Community Development Lending

The bank did not have any community development loans.

Product Innovation and Flexibility

The bank did not identify the use of innovative or flexible lending programs or products.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the Investment Test is rated **ALow Satisfactory**.@ Based on a full scope review, the bank's performance in the Miami MSA is adequate considering the available opportunities.

During the assessment period, ENB made four investments routinely provided by private investors. It invested in a certificate of deposit at a minority-owned bank located in a moderate-income geography. The investment promoted community development as the minority-owned bank facilitated lending in low and moderate-income geographies. Another investment was in a local housing authority bond to refinance a 49-unit multifamily housing project which provided affordable housing for low-income individuals under Section 8 of the Housing Act. The bank made grants to two organizations that

provided community services targeted to low- and moderate-income individuals. Prior period investments include an equity investment in a nonprofit corporation that provides technical and financial assistance to small businesses.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated **Low Satisfactory**.[@] Based on a full scope review, the bank's performance in the Miami MSA is adequate.

Retail Banking Services

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery systems.

ENB's delivery systems are reasonably accessible to geographies and individuals of different income levels in its AA. While four offices are located in upper income geographies and one is in a middle-income geography, low- and moderate-income geographies either abut or surround the offices. Public transportation is available to get to the majority of the offices as they are located primarily in business areas.

Its range of services and hours of operation do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies, and low- and moderate-income individuals. The Miami Lakes/Hialeah, Coral Gables and Kendall Banking Centers respective lobbies and drive-thrus are open through 6:00 p.m. on Fridays. ENB does not have Saturday banking hours.

The bank had not opened or closed any branches during the assessment period.

Community Development Services

The bank has provided an adequate level of community development services. The services were provided to small businesses and low- and moderate-income individuals. The services also responded primarily to the identified needs of the AA. Services included the following:

- 1997 Home Buyers=Fair - sponsored by Fannie Mae Foundation and Metro Dade Housing Agency targeted to low- and moderate-income home buyers. The bank officers/employees provided technical assistance to low- and moderate-income individuals in applying for a mortgage.

- p Miami Business Expo - provided technical assistance on budgeting issues to small business owners and Small Business Administration prospects.

- p Women Business Expo - provided technical assistance on financial matters to small businesses.

- p Centro Mater Child Care & Neighborhood Center - bank employees provided technical assistance on financial matters to this nonprofit organization dedicated to low-income individuals. The Center is located in a low-income area.

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 **AFull-Scope@**) and those that received a less comprehensive review (designated by the term **ALimited-Scope@**).

Time Period Reviewed	Lending Test: (January 1 1997 to December 31, 1998) Investment Test: (January 1, 1997 to September 30, 1999) Service Test: (January 1, 1997 to September 30, 1999)	
Financial Institution	Products Reviewed	
Eastern National Bank Miami, Florida	HMDA loans Small Business Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Miami MSA #5000	Full-Scope	

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Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews 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	14%	21%	36%	28%	1%
Population by Geography	1,937,094	9%	20%	38%	33%	0%
Owner-Occupied Housing by Geography	376,006	3%	13%	41%	43%	0%
Businesses by Geography	89,530	11%	20%	31%	38%	0%
Farms by Geography	1,285	4%	14%	35%	47%	0%
Family Distribution by Income Level	485,213	23%	17%	19%	41%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	485,213	8%	19%	39%	34%	0%
Median Family Income = \$33,980						
HUD Adjusted Median Family Income for 1998 = \$39,200						
Households Below the Poverty Level = 17.6%						
			Median Housing Value = \$100,570			
			Unemployment Rate 12/31/98 = 6.1%			

Source: 1990 U.S. Census and 1998 HUD updated MFI.

Description of Assessment Area

The bank has designated all of the Miami, Florida MSA (Dade County) as its assessment area. Dade County's economy is diverse. Major industries include real estate development, trade business with Latin America, tourism, and banking. The Dade County airports and seaports are among the fastest growing in the United States. In the extreme southern section of Dade County, 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. The coastal communities of the area are characterized by luxury residences and wealthy individuals.

The Miami MSA is Florida's largest metropolitan area and most populous with approximately 2 million people in a 2,000 square mile area. It is also the third poorest of large metropolitan areas in the United States. Income levels and poverty rates experienced in Dade County have profound implications for meeting the housing needs of a large portion of the population.

The Dade County Strategic Plan notes four factors that make affordable housing harder to produce in the City of Miami. First is the Real Property Tax. The last three include several government requirements. These are tougher building codes as a result of Hurricane Andrew, building moratoriums based on limited sewage treatment plant capacity, and an impact fee being assessed in designated Community Development Block Grant project areas. In response, several nonprofit agencies were formed to partner with the private sector to promote affordable housing.

To determine the community credit needs within the assessment area, we met with a nonprofit agency that promotes small business activities in Dade County. This nonprofit agency houses about 40 business incubators in its building. ENB was one of the many financial institution investors who made the initial investments in this agency. We also reviewed recent community contacts conducted by federal bank regulators in connection with previous CRA examinations.

The primary credit needs identified through these community contacts were accounts receivable financing for small businesses and financing for affordable housing (i.e., single family rental, multi-family rental, and home ownership) and funds to repair and rehabilitate existing homes. Working capital loans for small farms (primarily in the Homestead area) are also needed. Auto loans, affordable homes and rental apartments are mostly needed by new immigrants and migrant farmers.

Dade County presents several investments and community development opportunities where area banks can participate. The 1995 Dade County Strategic Plan detailed a five-year empowerment program that called for \$400 million in investments from the private sector and \$1.3 billion from the government. The Round 2 Urban Empowerment Zone listed the Homestead/Florida City, Northside/Poinciana Industrial Center, and the Opa Locka as useable sites. These are areas accessible from the bank's Kendall, MICC and Hialeah branches.

There are other community development organizations. Investments in these organizations include tax-exempt bonds for low and moderate income housing, small business investment corporations, and organizations whose primary missions revitalize low and moderate income geographies by making small business and affordable housing loans. Grants are also accepted by these organizations.

Appendix C: Tables of Performance Data

Content of Standardized Tables

The tables cover the entire CRA evaluation period. 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; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated 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 rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of HMDA Home Improvement Loan Originations** - See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations** - See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (<\$1 million) to businesses originated 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 rank and market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (<\$500,000) to farms originated 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 rank and market share information based on the most recent aggregate market data available.
- Table 7. Borrower Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations** - See Table 7.
- Table 9. Borrower Distribution of HMDA Refinance Loan Originations** - See Table 7.
- Table 10. Borrower Distribution of Small Business Loan Originations** - Compares the percentage distribution of the number of small loans (<\$1 million) originated 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. The table also presents the percentage distribution of the number of loans originated 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 11. Borrower Distribution of Small Farm Loan Originations** - Compares the percentage distribution of the number of small loans (<\$500 thousand) originated 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. The table also presents the percentage distribution of the number of loans originated 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.

Table 13. Distribution of Branch and ATM Delivery System - Compares the percentage distribution of the number of the bank's retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

Table 14. Geographic and Borrower Distribution of Consumer Loan Originations - 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 the population 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 MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME													State: Florida	Evaluation Period: January 1, 1997 TO December 31, 1998	
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
Full-Scope:															
Miami MSA	100%	62	\$6,785	349	\$42,071	0	\$0	0	\$0	411	\$48,856	100%			
Limited-Scope:															
None															

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE																	State: Florida	Evaluation Period: January 1, 1997 TO December 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans				
	% 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	#	% of Total			
Full-Scope:																			
Miami MSA	3%	0%	13%	0%	41%	18%	43%	82%	143	< 1	0	0	0	< 1	11	100%			
Limited-Scope:																			
None																			

(*) Based on 1997 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT		State: Florida				Evaluation Period: January 1, 1997 TO December 31, 1998							Total Home Improvement Loans			
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	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		
Full-Scope:																
Miami MSA	3%	3%	13%	13%	41%	28%	43%	56%	32	< 1	0	< 1	< 1	1	39	100%
Limited-Scope:																
None																

(*) Based on 1997 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE		State: Florida				Evaluation Period: January 1, 1997 TO December 31, 1998							Total Home Mortgage Refinance Loans			
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	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		
Full-Scope:																
Miami MSA	3%	0%	13%	0%	41%	42%	43%	58%	122	< 1	0	0	< 1	< 1	12	100%
Limited-Scope:																
None																

(*) Based on 1997 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Business Loan Originations

Geographic Distribution: SMALL BUSINESS State: Florida Evaluation Period: January 1, 1997 TO December 31, 1998																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Miami MSA	11%	10%	20%	19%	31%	19%	38%	52%	21	1	1	1	1	1	349	100%
Limited-Scope:																
None																

(*) Based on 1997 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM State: Florida Evaluation Period: January 1, 1997 TO December 31, 1998																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Miami MSA	4%	0%	14%	0%	35%	0%	47%	0%	0	0	0	0	0	0	0	100%
Limited-Scope:																
None																

(*) Based on 1997 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loan Originations

Borrower Distribution: HMDA HOME PURCHASE State: Florida Evaluation Period: January 1, 1997 TO December 31, 1998																
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Miami MSA	23%	0%	16%	0%	19%	0%	42%	82%	143	< 1	0	< 1	0	< 1	11	100%
Limited-Scope:																
None																

(*) As a percentage of loans with borrower income information available. No information was available for 18% of loans originated by ENB.

(**) Based on 1997 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loan Originations

Borrower Distribution: HOME IMPROVEMENT State: Florida Evaluation Period: January 1, 1997 TO December 31, 1998																
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Miami MSA	23%	8%	16%	16%	19%	8%	42%	68%	32	< 1	1	< 1	< 1	< 1	39	100%
Limited-Scope:																
None																

(*) As a percentage of loans with borrower income information available. No information was available for 2% of loans originated by ENB.

(**) Based on 1997 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE																
State: Florida				Evaluation Period: January 1, 1997 TO December 31, 1998												
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Miami MSA	23%	0%	16%	0%	19%	17%	42%	83%	122%	< 1	< 1	0	0	< 1	12	100%
Limited-Scope:																
None																

(*) As a percentage of loans with borrower income information available.

(**) Based on 1997 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS											
State: Florida				Evaluation Period: January 1, 1997 TO December 31, 1998							
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans		
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Miami MSA	74%	43%	45%	74%	14%	12%	1	1	349	100%	\$121
Limited-Scope:											
None											

(*) As a percentage of businesses with known revenues.

(**) As a percentage of loans with revenue information available. No information was available for 19% of loans originated by ENB.

(***) The market consists of all other Small Business reporters in ENB's assessment area and is based on 1997 Aggregate Small Business Data only.

(****) Based on 1997 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM State: Florida Evaluation Period: January 1, 1997 TO December 31, 1998											
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans		
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Miami MSA	85%	0%	44%	0%	0%	0%	0	0	0	0%	\$0
Limited-Scope:											
None											

(*) As a percentage of farms with known revenues.

(**) As a percentage of loans with revenue information available.

(***) The market consists of all other Small Farm reporters in BANK's assessment area and is based on 1997 Aggregate Small Farm Data only.

(****) Based on 1997 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS State: Florida Evaluation Period: January 1, 1997 TO September 30, 1999										
MSA/Assessment Areas:	Prior Period Investment			Current Period Investm			Total Investments			
		\$	%		\$	%		\$	%	
Full-Scope:										
Miami MSA	1	25	100%	4	201	100%	5	\$226	100%	
Limited-Scope:										
None										

(*) Prior Period Investments means investments made in a previous evaluation period that remain outstanding.

(**) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM															
				State: Florida				Evaluation Period: January 1, 1997 TO September 30, 1999							
MSA/Assessment Area:	Deposits	Branches						ATMs						Pop	
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies				% of the Pop Each G	
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod
Full-Scope:															
Miami MSA	100%	5	100%	0%	0%	20%	80%	3	100%	0%	0%	0%	100%	9%	19%
Limited-Scope:															
None															