



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## Public Disclosure

January 16, 2001

### Community Reinvestment Act Performance Evaluation

**Mellon United National Bank  
Charter Number: 16401  
1399 SW 1<sup>st</sup> Avenue  
Miami, Florida 33130**

Office of the Comptroller of the Currency  
Large Bank Supervision  
250 E Street, SW  
Mail Stop 6-1  
Washington, DC 20219

**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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## 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 CRA performance of **Mellon United National Bank** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, commenced on **January 16, 2001**. The agency evaluates performance in assessment area(s), 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 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.

**Block Numbering Area (BNA)** - Statistical subdivisions of counties in which census tracts have not been established. The U.S. Census Bureau has established BNAs in conjunction with state agencies.

**Census Tract (CT)** - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the U.S. 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).

**Geography** - A census tract or a block numbering area delineated by the U.S. 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 refinancing 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 percent of the median family income.

**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 Statistical Area (MSA)** - Area defined by the director of the U.S. 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 percent and less than 120 percent of the MFI.

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

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

**Small Loans to Farms** - Loans with original amounts of \$500,000 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 non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated “**Outstanding**”,

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

Performance Levels	Mellon United National Bank Miami, Florida Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	<b>X</b>	<b>X</b>	
High Satisfactory			
Low Satisfactory			<b>X</b>
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:

- A high volume of small loans to businesses.
- Excellent geographic distribution of small business loans. MUNB’s small business lending in the low- and moderate-income tracts exceeds the percentage of businesses located in these areas.
- An adequate distribution of loans to businesses of different revenue sizes.
- Excellent community development lending activity. Community development lending includes support for affordable housing and has favorably impacted the bank’s performance in meeting the credit needs of the community.
- Investments that reflect an excellent volume level and responsiveness to the needs of the community.
- Adequate community development services and service delivery systems to geographies and individuals of different income levels in the Assessment Areas.

## Description of Institution

Mellon United National Bank (MUNB), headquartered in Miami, Florida is a wholly-owned subsidiary of Mellon Financial Corporation (MFC), a multi-bank holding company based in Pittsburgh Pennsylvania. MUNB previously operated as United National Bank prior to its acquisition by MFC in January 1998. MUNB has 14 banking offices in southeastern Florida: Specifically, ten in Miami-Dade County, two in Broward County and two in Palm Beach County. MUNB's market share of deposits in Florida is .33%, ranking it 32<sup>nd</sup> in the state as of June 2000.

The majority of the bank's business is conducted in Miami-Dade County, Florida. MUNB's strategic focus is serving the commercial banking needs of business and professional people. MUNB's lending activities center upon commercial and real estate development. This includes construction financing of commercial and multifamily housing projects. Residential mortgage and consumer lending are not part of MUNB's core strategy and comprise only a small part of MUNB's loan activity.

As of December 31, 2000, MUNB reported total assets of \$1.425 billion and total loans of \$733 million. The loan portfolio mix is 64% commercial real estate and construction, 20% commercial, 11% residential real estate, 7% multifamily real estate, and 6% consumer lending. Tier 1 Capital is \$139 million and the loan to deposit ratio is 94%.

MFC is a major financial services company with December 31, 2000 total assets approximating \$50 billion. Affiliate banking offices exist in the states of Pennsylvania, New Jersey, Maryland, Massachusetts, California and Delaware. MFC is also a significant provider of domestic and international investment management, trust and custody services.

MUNB requested that the lending activity of AFCO Credit Corporation (AFCO) and the investment activity Mellon Bank Community Development Corporation (MBCDC) be considered when evaluating the bank's performance. AFCO is an affiliated MFC credit company that provides insurance premium financing throughout the United States, including a large number of credits within MUNB's assessment area. Lending activity by AFCO within MUNB's assessment area has been included in our analysis of the bank's CRA performance. MBCDC is MFC subsidiary that has made affordable housing investments in MUNB's assessment area.

There are no legal, financial or other factors impeding MUNB's ability to help meet the credit needs of the communities it serves. MUNB's performance was rated "Satisfactory" at its last CRA evaluation dated December 23, 1997.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period is January 1, 1998 through December 31, 2000. The beginning of this assessment period coincides with the month that MFC acquired MUNB. The lending test includes small business, community development and HMDA reportable loans. Agriculture lending is not a business line for MUNB. Small farm loan volume was immaterial and not analyzed. Community development investments and services, retail banking locations and services were reviewed in connection with the Investment and Service Tests.

### Data Integrity

The scope of this examination included a review of the accuracy of the bank data being utilized to evaluate its performance. The data tested includes information available to the public in accordance with the Home Mortgage Disclosure Act and the CRA regulation. Non-public bank data was also reviewed for community development loans, investments and services.

Errors were found in the bank's data for 1999 and 2000 small business loans and 1998 and 1999 home mortgage loans. Management was able to correct the errors and the corrected data was used for this evaluation. Due to these corrections, the data analyzed in this evaluation will differ from the publicly reported 1998 and 1999 data. The 2000 small business loan data was corrected by management prior to the required submission date and is accurate.

Some non-public community development loans, investments and services information submitted by MUNB were excluded from this evaluation because they did not meet the definition or purpose of community development as defined under the CRA.

### Selection of Areas for Full-Scope Review

MUNB has three assessment areas: the Miami-Dade MSA, Fort Lauderdale MSA and West Palm Beach MSA. The Miami-Dade MSA was selected for a full-scope review. This MSA represents MUNB's major market and contains approximately 86% of the bank's deposits and 59% of reportable lending activity. MUNB's market share of deposits in Miami-Dade MSA is 1.47%, ranking it 14th in the MSA as of June 2000.

The remaining two MSA's received a limited-scope review. Refer to Appendix A for additional information on the examination scope.



## **Ratings**

The bank's overall rating is based primarily on the performance of the full-scope area. This reflects the overall size and significance of the bank's activity in the full-scope area compared to the limited-scope assessment areas.

When determining conclusions for the lending test, small loans to businesses were weighted more heavily than home mortgage loans. This weighting is reflective of MUNB's loan volume by product type and the bank's strategic emphasis on commercial lending.

## **Other**

To assist us in identifying credit and community development needs we met with a community organization that provides training and support for the self-employment of low- and moderate-income individuals. We also reviewed six community contacts previously conducted in the Miami-Dade MSA by the OCC or other regulatory agencies. The most commonly identified community development need continues to be affordable housing - rehabilitation and new construction for both single family and multi-family occupancy. Also identified as needs were credit to very small businesses and entrepreneurs, homeownership counseling and small business owner technical training.

## **Fair Lending Review**

An analysis of 1998 and 1999 HMDA, Small Business, and Small Farm lending data, public comments and consumer complaint information 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 October 1997.

## 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 Miami-Dade MSA is excellent.

#### Lending Activity

The bank's volume of lending is excellent. Refer to Table 1 in appendix C for the facts and data used to evaluate the bank's lending activity.

The volume of MUNB's small business lending is excellent. In 1999, the bank's 5.4% market share placed it third among lenders in the Miami-Dade MSA. By comparison, the bank's 1.4% market share of deposits ranks it fourteenth among financial institutions. MUNB's small business lending volume is significantly bolstered by the presence of loans granted by AFCO, an affiliated lender with a strong market presence in Florida. AFCO generated 78% of the small loans to businesses reported by MUNB for the evaluation period. MUNB's 1999 market share of small business loans without its affiliate activity is 1.5%, comparable to its deposit market share. AFCO provides businesses a simple, convenient method of financing, although its singular product focus makes it less versatile than some types of financial products.

Home mortgage volume is weak. However, as previously noted, home mortgage lending (purchase, home improvement and refinance) is not part of MUNB's core lending strategy. Home mortgage lending is done on an exception basis as an accommodation to existing bank customers or for investor real estate purposes. Accordingly, the number of home mortgage loans made by MUNB is low. For 1999, MUNB ranked 235<sup>th</sup> with a market share of .01% of HMDA loans.

Community development lending volume is excellent.

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

### ***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 and purchases. As previously described, MUNB is not an active home mortgage lender. We reviewed the geographic distribution and market share analysis of these loans, but determined that due to the low volume of home mortgage loans this category would have limited weight in evaluating the bank's lending performance.

Home purchase lending geographic distribution is adequate. The percentage of home purchase loans in moderate-income census tracts is slightly below demographics. MUNB made no home purchase loans in low-income census tracts.

Home improvement lending geographic distribution is adequate. The percentage of home improvement loans in moderate-income census tracts exceeds demographics, but is not very meaningful due to the small number of loans. MUNB made no home improvement loans in low-income census tracts.

Refinanced home lending geographic distribution is poor. The total number of refinanced loans is small and none were in low or moderate-income areas.

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

Refer to Table 5 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 small loan to businesses geographic distribution in the Miami-Dade MSA is excellent. The percentage of MUNB's loans in both low and moderate-income census tracts exceed the percentage of businesses located in these tracts. MUNB's market share in low-income tracts significantly exceeds its overall market share. In moderate-income census tracts MUNB's market share is slightly higher than its overall share of the MSA's market. These facts support that the bank is successfully providing small business credit in the assessment area and especially in low and moderate-income geographies.

### ***Small Loans to Farms***

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 farms. With only one small loan to a farm we did not analyze this performance factor.

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

No unexplained conspicuous gaps in the bank lending distribution were identified. Maps and reports detailing location information of MUNB's small business lending activity were reviewed as part of the geographic distribution analysis. Areas with no or low loan penetration levels were evaluated and found to be similar to areas where the number of businesses present would afford limited opportunities for lending. Loan penetration during the evaluation period occurred in over 90% of the Miami-Dade census tracts.

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

A substantial majority of the bank's loans are located within its three assessment areas. Over 98% of both home mortgage and small business lending took place inside the bank's assessment area. This performance was positively factored into the overall geographic distribution analysis. The inside/outside ratio is calculated using only loans made directly by the bank and doesn't reflect lending by affiliates.

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

### ***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 origination and purchases.

Distribution of home purchase, improvement and refinance loans to low and moderate-income borrowers in Miami-Dade MSA is poor. MUNB did not originate any home mortgage loans to low or moderate-income borrowers. Home mortgage lending by MUNB in the Miami-Dade MSA is primarily done on an exception basis to accommodate existing bank customers. We reviewed the distribution of loans by the income of the borrower but determined that due to the low volume of home mortgage loans this category would have limited weight in evaluating the bank's lending performance.

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

Refer to Table 10 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 loans to businesses of different sizes in Miami-Dade MSA is adequate.

The percent of MUNB's small loans to small businesses (businesses with annual revenue of \$1 million or less) is significantly below the percent of businesses in the MSA that are defined as small businesses. However, revenue data is not available for a large portion (66%), of the bank's portfolio, including most AFCO loans. Analyzing loans for which revenue data is available reveals that it is fairly evenly divided, with 53% to business with \$1 million or less in revenue and the remainder to larger revenue firms. A significant percentage (89%) of the loans the bank made were for original loan amounts of \$100,000 or less. This includes both loans with and without borrower revenue information.

### ***Small Loans to Farms***

Refer to Table 11 in the appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses. With only one small loan to a farm we did not analyze this performance factor.

### **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.

Community development lending is excellent, which positively impacts the overall Lending Test rating. MUNB has extended a significant amount of dollars in community development loans that address a range of different community needs. The greatest number and dollars of community development lending centers on affordable housing - 12 loans totaling \$23 million. Affordable housing has been identified as a primary credit need in the Miami-Dade MSA. Specific community development loans for affordable housing loans include: funds for the renovation and financing of Section 8 rental voucher housing; a warehouse line of credit to support the sale of condominiums to low and moderate- income families; and a large warehouse line of credit to a non-profit affordable housing organization to support its inventory of mortgages.

Other community development loans support the stabilization and revitalization of the assessment area by financing commercial re-development of depressed or closed commercial properties. One loan for \$3.6 million renovated a defunct hotel in a low-income census tract, creating over 25 jobs for low and moderate-income residents. Another \$1.5 million loan resulted in a drug store being located in a moderate-income neighborhood. Loans to non-profit organizations helped to support a community center and a soup kitchen.

## **Product Innovation and Flexibility**

Product innovation and flexibility in the Miami-Dade MSA had a neutral impact on lending test conclusions. MUNB demonstrated flexibility in providing a non-profit organization a large, below market rate, mortgage warehouse line of credit. This enabled the non-profit to more easily afford its portfolio of affordable housing.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Fort Lauderdale MSA is not inconsistent with the bank's overall "Outstanding" performance under the lending test. Performance in the West Palm Beach MSA is weaker than the bank's overall lending performance. This is primarily based on the significantly lower level of community development loans; although, MUNB did participate in a West Palm Beach area program through which it granted several home purchase mortgages to low and moderate income borrowers. Performance in the West Palm Beach MSA did not affect the overall lending performance as the area represents just 7% of MUNB's total deposits and 15% of the total reported loans. Refer to Tables 1 through 11 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 full-scope review, the bank's performance in the Miami-Dade MSA is excellent. Refer to Table 12 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

MUNB has extended a significant volume of investments and grants. The \$5.254 million of investments originated in the Miami-Dade MSA during the evaluation period equals 4.3% of the bank's allocated Tier 1 Capital<sup>1</sup>. Prior period investments that are still outstanding total an additional \$4.559 million or 3.9% of allocated Tier 1 Capital. The investments are highly responsive to identified credit and community development needs, but are not considered innovative or complex in their design or requirements.

The majority of MUNB's Community Development Investments have been for the purpose of affordable housing, an identified community need. During the evaluation period MUNB invested \$5 million in six Fannie Mae, Ginnie Mae or Miami-Dade Housing Finance Authority backed securities. These securities, supported pools of single family home mortgages to low or moderate income borrowers, HUD Section 8 affordable rental housing, and construction of new affordable multi-family housing.

During the rating period, the bank renewed a \$100,000 Certificate of Deposit in a minority-owned bank that is certified as a Community Development Financial Institution (CDFI). CDFI's are intended to promote community development.

During the evaluation period, the bank made qualified community development grants and donations to 25 organizations totaling \$162,416. The majority of these grants were to support educational services to low-and moderate-income individuals or affordable housing programs.

Various prior period investments remain on the bank's books. They consist primarily of local, affordable housing mortgage-backed securities and Miami-Dade Housing Finance Authority bonds. There also is a \$25,000 Certificate of Deposit that continues to be pledged to secure a non-profit organization's micro-loan lending program.

### Conclusions for Area 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

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<sup>1</sup> Tier 1 Capital is allocated between the bank's assessment areas based on the percentage distribution of deposits as of June 30, 2000. This allows a comparison of the respective investments to the Tier 1 Capital allocated to each assessment area.

overall “Outstanding” performance under the investment test. Refer to Table 12 in appendix C for the facts and data that support these conclusion.



## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "**Low Satisfactory**". Based on full-scope review, the bank's performance in the Miami-Dade 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 delivery system and branch openings and closings.

MUNB's delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the full-scope assessment area. The bank has two offices in low-income geographies. The proportion of MUNB's offices located in low-income geographies exceeds the percentage of Miami-Dade MSA population living in such geographies. However, both of these offices are located in the same, predominately business, downtown Miami census tract. MUNB has one office located in a moderate-income census tract. The proportion of MUNB's office located in the moderate-income geography is lower than the percent of population living in such geographies.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and low- and moderate-income individuals. During the evaluation period one office was opened in 1998 in Miami-Dade MSA. This is in a moderate-income census tract that has undergone significant redevelopment. Therefore its opening was considered to have only modestly improved branch accessibility to low and moderate income geographies and individuals. The bank did not close any offices during the evaluation period.

MUNB's office hours and services in the Miami MSA are generally comparable among locations regardless of the income level of the geography. Bank lobbies and drive-through offices are open Monday through Friday. Three of the ten offices have drive-through services. Most offices without drive-through service, including those in the low and moderate-income areas, are in locations (e.g. urban business districts) where space or other factors preclude the ability to provide drive-through service. MUNB does not have ATMs but does offer debit cards and toll-free telephone service. There are no alternative delivery systems that increase the effectiveness of delivering retail banking services to low- and moderate-income geographies and low- and moderate-income individuals.

## **Community Development Services**

MUNB's performance in providing CD services in the full-scope AA is adequate. In the Miami-Dade MSA, MUNB and its officers provide an adequate level of CD services to organizations located throughout the MSA. Three MUNB employees participate in community development services in the Miami-Dade MSA.

They assist organizations by providing credit counseling, credit evaluation, and financial expertise in the areas of affordable housing and small business development.

Examples of the organization and service provided are as follow:

*Greater Miami Local Initiatives Support Corporation.* LISC provides loans and grants to community development corporations in the Miami MSA. One of the bank's executive officers serves on the LISC Executive Committee and Chairs the LISC's Redevelopment Committee. This committee regularly meets with various areas CDCs.

*Miami Beach Community Development Corporation.* Provides redevelopment and revitalization of Miami Beach Enterprise Zone. One of the bank's officers serves on the CDC's Board of Directors, which addresses economic revitalization, affordable housing, and community development in areas that include low and moderate- income geographies.

*Habitat for Humanity of Greater Miami, Inc.* A non-profit organization that builds homes for low-income families. Habitat works to eliminate poverty in housing by depending on volunteer labor and sweat equity from the selected homeowner. An officer of the bank assists in acquiring funds, building sites, materials, and services for the organization.

## **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 are not inconsistent with the bank's overall "Low Satisfactory" performance under the Service Test. Refer to Table 13 in appendix C for the facts and data that support these conclusions.

## Appendix A: Scope of Evaluation

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

<b>Time Period Reviewed</b>	Lending Test (includes CD Loans): (01/01/98 to 12/31/00) Investment and Service Tests: : (01/01/98 to 12/31/00)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Mellon United National Bank (MUNB) Miami, Florida	Small Loans to Businesses, HMDA Loans, and Community Development Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
AFCO Credit Corporation (AFCO)  Mellon Bank CDC (MBCDC)	Credit Company  Community Development Corp.	Small Loans to Businesses  Investments
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Miami-Dade MSA #5000  Fort Lauderdale MSA#2680 West Palm Beach MSA #8960	Full-Scope  Limited-Scope Limited-Scope	

## Appendix B: Market Profiles for Full-Scope Areas

### Miami-Dade MSA 5000

Demographic Information for Full-Scope Area: Miami-Dade						
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	10%	19%	39%	32%	0%
Owner-Occupied Housing by Geography	376,006	3%	13%	41%	43%	0%
Businesses by Geography	94,349	10%	19%	31%	40%	0%
Farms by Geography	1,682	3%	13%	36%	48%	0%
Family Distribution by Income Level	485,213	23%	17%	19%	41%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	192,734	15%	28%	40%	17%	0%
Median Family Income	\$31,113	Median Housing Value		86,012		
HUD Adjusted Median Family Income for 2000	\$43,700	Unemployment Rate		4.93%		
Households Below the Poverty Level	18%					

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

Source: 1990 U.S. Census, and 2000 HUD updated MFI.

The Miami-Dade MSA and MUNB's Assessment Area consists of all of Miami-Dade County. Its 267 census tracts include 36 low-income, 57 moderate-income, 96 middle-income, 75 upper-income and 3 not applicable. The 3 not applicable census tracts are primarily crews from shipping vessels at port.

Miami-Dade County has a diversified, growing economy. Service, trade and manufacturing are the three largest business sectors. Tourism adds more than \$10 billion of revenue to the economy. Miami is a growing center of international trade, finance and commerce. Its airport, seaport and physical location have made Miami the gateway to Latin America and the Caribbean. Unemployment has been steadily declining during the evaluation period.

The population continues to grow as business expands, retirees relocate to the area and foreign immigration occurs. The population is currently estimated at 2.2 million and

expected to continue to grow. Miami's proximity to the Everglades limits its physical expansion westward resulting in increasing population density. Housing costs in the MSA are high, making home-ownership difficult for many. While its luxury residences and wealthy individuals characterize the coastal area, Miami-Dade is the sixth poorest of the nation's large counties and the City of Miami was ranked as the fourth poorest city in the United States. Other issues facing the area include weaknesses in the education system and labor force skill levels.

Competition within the bank's assessment area is intense. FDIC data, as of June 30, 2000, showed 87 financial institutions and 478 offices in Miami-Dade County. Numerous large regional, community and specialty banks compete in the market as well as other forms of financial services businesses. MUNB derives 86% of its deposits and 59% of its lending from the MSA. MUNB's market share of deposits in Miami-Dade MSA is 1.47%, ranking it 14th in the MSA as of June 2000.

There were many opportunities, although competition is keen, for community development lending, investment and services throughout the MSA. Within the MSA there are non-profit organizations whose missions focus on providing low- and moderate-income areas and people affordable housing and community services. There are non-profit organizations whose mission is economic development. Among the types of community development investments available are governmental sponsored bonds, low-income housing tax credits and contributions to qualified non-profit organizations.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Evaluation). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as origination/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 MSA/assessment area.

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 MSA/assessment area.

**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 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.

**Table 6. 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.

- Table 7. 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 MSA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Home Mortgage Refinance Loans** - See Table 7.
- Table 10. 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 11. 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

**Table 13. 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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.



**Table 1. Lending Volume**

LENDING VOLUME		State: Florida				Evaluation Period: January 1, 1998 to December 31, 2000						
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:												
Miami-Dade MSA	59%	45	34,702	5,964	271,594	1	200	23	41,343	6,033	347,839	86%
Limited-Review:												
Fort Lauderdale MSA	26%	5	2,155	2,596	73,753	0	0	7	15,312	2,608	91,220	7%
West Palm Beach MSA	15%	16	3,825	1,464	65,195	0	0	1	10	1,481	70,511	7%

(\*) Rated area refers to either the state or rating area.

(\*\*) The evaluation period for Community Development Loans is January 1, 1988 to December 31, 2001.

(\*\*\*) Deposit data as of June 30, 2000. Rated area refers to either the state rating area.

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

Geographic Distribution: HOME PURCHASE												State: Florida		Evaluation Period: January 1, 1998 to December 31, 2000				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Miami-Dade MSA	24	59%	3%	0%	13%	10%	41%	19%	43%	71%	<1	<1	<1	<1	<1			
Limited-Review:																		
Fort Lauderdale MSA	3	7%	1%	0%	14%	0%	59%	33%	26%	67%	<1	0	0	0	<1			
West Palm Beach MSA	14	34%	1%	0%	21%	14%	46%	50%	32%	36%	<1	0	0	<2	0			

(\*) Home purchase loans originated and purchased in the MSA/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.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Geographic Distribution: HOME IMPROVEMENT												State: Florida		Evaluation Period: January 1, 1998 to December 31, 2000				
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Miami-Dade MSA	5	83%	3%	0%	13%	40%	41%	0%	43%	60%	<1	0	<1	0	<1			
Limited-Review:																		
Fort Lauderdale MSA	0	0%	1%	0%	14%	0%	59%	0%	26%	0%	0	0	0	0	0			
West Palm Beach MSA	1	17%	1%	0%	21%	0%	46%	100%	32%	0%	0	0	0	0	0			

(\*) Home improvement loans originated and purchased in the MSA/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 the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Geographic Distribution: HOME MORTGAGE REFINANCE												State: Florida		Evaluation Period: January 1, 1998 to December 31, 2000				
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***							
	#	% of Total*	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	% Owner Occ Units**	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Miami-Dade MSA	4	66%	3%	0%	13%	0%	41%	25%	43%	75%	<1	<1	<1	<1	<1			
Limited-Review:																		
Fort Lauderdale MSA	1	17%	1%	0%	14%	0%	59%	100%	26%	0%	0	0	0	0	0			
West Palm Beach MSA	1	17%	1%	0%	21%	0%	46%	0%	32%	100%	0	0	0	0	0			

(\*) Home mortgage refinance loans originated and purchased in the MSA/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 the number of owner-occupied housing units in the area based on 1990 Census information.

(\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES												State: Florida		Evaluation Period: January 1, 1998 to December 31, 2000				
MSA/Assessment Area:	Total Small Loans To Businesses		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-Dade MSA	5,964	59%	11%	14%	19%	20%	31%	26%	39%	40%	5	13	7	5	5			
Limited-Review:																		
Fort Lauderdale MSA	2,596	26%	6%	8%	17%	14%	50%	50%	27%	28%	4	7	4	4	3			
West Palm Beach MSA	1,464	15%	3%	5%	19%	18%	43%	32%	35%	45%	3	6	4	2	3			

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

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on 1999 Aggregate Small Business Data only.

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

Geographic Distribution: SMALL LOANS TO FARMS		State: Florida		Evaluation Period: January 1, 1998 to December 31, 2000											
MSA/Assessment Area:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Miami-Dade MSA	1	100%	3%	0%	13%	0%	36%	0%	48%	100%	0	0	0	0	0
Limited-Review:															
Fort Lauderdale MSA	0	0	3%	0%	18%	0%	51%	0%	28%	0%	0	0	0	0	0
West Palm Beach MSA	0	0	4%	0%	15%	0%	51%	0%	30%	0%	0	0	0	0	0

(\*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

(\*\*) Source of Data-Dunn and Bradstreet.

(\*\*\*) Based on [Year] Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		State: Florida		Evaluation Period: January 1, 1998 to December 31, 2000											
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full-Review:															
Miami-Dade MSA	24	59%	23%	0%	17%	0%	19%	0%	41%	100%	<1	0	0	0	<1
Limited-Review:															
Fort Lauderdale MSA	3	7%	20%	0%	18%	33%	22%	0%	40%	67%	0	0	<1	0	<1
West Palm Beach MSA	14	34%	19%	36%	19%	14%	23%	0%	39%	50%	<1	<1	<1	0	<1

(\*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.  
 (\*\*) Percentage of Families is based on 1990 Census information.  
 (\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the bank.  
 (\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

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

Borrower Distribution: HOME IMPROVEMENT		State: Florida		Evaluation Period: January 1, 1998 to December 31, 2000											
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full-Review:															
Miami-Dade MSA	5	83%	23%	0%	17%	0%	19%	0%	41%	100%	<1	0	0	0	<1
Limited-Review:															
Fort Lauderdale MSA	0	0%	20%	0%	18%	0%	22%	0%	40%	0%	0	0	0	0	0
West Palm Beach MSA	1	17%	19%	0%	19%	0%	23%	0%	39%	100%	0	0	0	0	0

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

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the bank.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.



**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE												State: Florida		Evaluation Period: January 1, 1998 to December 31, 2000				
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****							
	#	% of Total*	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	% of Families*	% BANK Loans***	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Miami-Dade MSA	4	66%	23%	0%	17%	0%	19%	0%	41%	100%	<1	0	0	0	<1			
Limited-Review:																		
Fort Lauderdale MSA	1	17%	20%	0%	18%	0%	22%	0%	40%	100%	0	0	0	0	0			
West Palm Beach MSA	1	17%	19%	0%	19%	0%	23%	0%	39%	100%	0	0	0	0	0			

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

(\*\*) Percentage of Families is based on 1990 Census information.

(\*\*\*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the bank.

(\*\*\*\*) Based on 1999 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			State: Florida		Evaluation Period: January 1, 1998 to December 31, 2000				
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-Dade MSA	5,964	59%	85%	19%	89%	7%	4%	6	3
Limited-Review:									
Fort Lauderdale MSA	2,596	26%	85%	15%	94%	4%	2%	4	1
West Palm Beach MSA	1,464	15%	90%	20%	91%	6%	3%	3	1

(\*) Small loans to businesses originated and purchased in the MSA/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.

(\*\*\*) 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 [66% of small loans to businesses originated and purchased by the bank.

(\*\*\*\*) Based on 1999 Aggregate Small Business Data only.

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

Borrower Distribution: SMALL LOANS TO FARMS		State: Florida		Evaluation Period: January 1, 1998 to December 31, 2000					
	Total Small Loans to Farms		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm 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-Dade	1	100%	94%	0%	0%	100%	0%	0	0
Limited-Review:									
Fort Lauderdale MSA	0	0%	94%	0%	0%	0%	0%	0	0
West Palm Beach MSA	0	0%	91%	0%	0%	0%	0%	0	0

(\*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

(\*\*) Farms with revenues of \$1 million or less as a percentage of all businesses.

(\*\*\*) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0% of small loans to businesses originated and purchased by the bank.

(\*\*\*\*) Based on 1999 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS State: Florida Evaluation Period: January 1, 1998 to January 16, 2001									
MA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Review:									
Miami-Dade MSA	7	4,559	32	5,260	39	9,819	42%	1	2,369
Limited-Review:									
Fort Lauderdale MSA	1	70	9	10,230	10	10,300	44%	1	194
West Palm Beach MSA	0	0	6	3,141	6	3,141	14%	1	431

(\*) "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 bank's financial reporting system.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								State: Florida		Evaluation Period: January 1, 1998 to January 16, 2001							
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Review:																	
Miami-Dade MSA	86%	10	72%	20%	10%	20%	50%	0	1	0	+1	0	0	9%	19%	40%	32%
Limited-Review:																	
Fort Lauderdale MSA	7%	2	14%	0%	50%	50%	0%	0	1	0	0	+1	0	3%	19%	55%	23%
West Palm Beach	7%	2	14%	0%	0%	50%	50%	0	1	0	0	0	+1	3%	22%	47%	28%