

PUBLIC DISCLOSURE

January 12, 1998

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Clewiston National Bank
Charter Number 16321**

**300 Berner Road
Clewiston, Florida 33440**

**Office of the Comptroller of the Currency
Administrator of National Banks**

**South Florida Field Office
5757 Blue Lagoon Drive, Suite 200
Miami, Florida 33126**

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.

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 **Clewiston National Bank** prepared by the **Comptroller of the Currency**, the institution's supervisory agency, as of January 12, 1998. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

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

Clewiston National Bank (CNB) demonstrates “satisfactory” performance in complying with the CRA. CNB’s has maintained a reasonable quarterly average loan-to-deposit ratio at 76%. Lending within the assessment area is strong at 95%. Finally, the distribution of loans among borrowers of different income levels is reasonable. We have received no complaints about the bank’s CRA performance.

Clewiston National Bank’s CRA performance was evaluated using the small bank performance criteria. Clewiston National Bank’s last CRA evaluation was as of February 5, 1996 and the bank was also rated satisfactory. The time-period evaluated during this review was from March 1996 through December 1997.

The following table indicates the performance level of **Clewiston National Bank** with respect to each of the five performance criteria.

SMALL INSTITUTION ASSESSMENT CRITERIA	<u>CLEWISTON NATIONAL BANK</u> PERFORMANCE LEVELS		
	Exceeds Standards for Satisfactory Performance	Meets Standards for Satisfactory Performance	Does not meet Standards for Satisfactory Performance
Loan to Deposit Ratio		X	
Lending in Assessment Area	X		
Lending to Borrowers of Different Incomes and to businesses of Different sizes		X	
Geographic Distribution of Loans		X	
Response to Complaints	No complaints have been received since the bank's inception.		

DESCRIPTION OF INSTITUTION

Clewiston National Bank (CNB) is a \$47 million community bank in Clewiston, Florida along the southwest edge of Lake Okeechobee. Big Lake Financial Corporation is a two-bank holding company that owns CNB. CNB operates as a consumer oriented community bank offering loan products that include residential mortgages, small business and consumer loans. The bank currently maintains a main and branch office in Clewiston and branch locations in LaBelle and Moore Haven. The loan portfolio on September 30, 1997 consisted of 53% residential real estate, 16% commercial real estate, 16% small business, and 15% consumer purpose loans. No financial or legal impediments would impair the bank's ability to comply with the CRA.

DESCRIPTION OF *Hendry and Glades Counties*

CNB's assessment area includes Hendry and Glades Counties. 1990 census data divides the assessment area into six "block numbering areas" (BNAs) with a combined population of 33,364. Total households in the area are 11,311. The 1990 census data show five BNAs are considered middle income (80-120% of median income) and one is upper income (more than 120% of median income). The U.S. Department of Housing and Urban Development has updated the State of Florida's Nonmetropolitan Median Family Income to \$32,500 in 1997.

Hendry County is a 1,153 acre area influenced heavily by the agriculture industry. Hendry County has two primary cities: Clewiston the largest city, and LaBelle-the county seat. The sugar industry is the primary economic influence in Clewiston and the citrus industry influences LaBelle. The U.S. Sugar Corporation is the largest employer in the County. Additional economic influences include winter vegetable farming and cattle raising, fishing and tourism.

Glades County is a 750 square mile area with Moore Haven as its county seat. Farming and tourism businesses are the primary economic influences in the county. The largest employers in Glades County are Wackenhut Prison Security and Lykes Brothers.

We obtained information about the community's credit needs from local community groups and identified mobile home and small business loans as community credit needs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA:

Loan-to-Deposit Ratio

CNB has maintained a stable average loan-to-deposit ratio. CNB averaged a 76% loan-to-deposit ratio from March 1996 to September 1997. CNB's reasonable ratio shows the willingness to lend. Furthermore, this level of lending is reasonable when compared with local competition for the same period. The average loan-to-deposit ratio for a similar bank in the area is 81% for the same period.

Lending in Assessment Area

A substantial majority of CNB's loans are within the assessment area. We verified the accuracy of management reports. Overall, 95% of the outstanding loans (by number) are to borrowers within the assessment area.

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

CNB's history of lending to borrowers of different income levels is reasonable. They have not arbitrarily excluded any income levels. We verified management's lending reports for a six month period. During this period, they originated three hundred and nine loans to consumers and small businesses. The following chart reflects the bank's lending practices in comparison to the 1990 census data.

Lending Performance January 1, 1997 through June 30, 1997		
Family Income Level	Percentage of Population (per 1990 Census Data)	Bank's Lending Pattern
Upper	40%	22%
Middle	21%	23%
Moderate	18%	35%
Low	21%	20%

Geographic Distribution of Loans

No meaningful analysis could be completed given the assessment area's characteristics: five middle-income and one upper-income tracts. CNB's lending performance by income level emphasizes borrower income levels and not the geographic tract income level.

Response to Complaints

Neither CNB nor the Comptroller of the Currency has received any complaints regarding the bank's CRA performance.

Compliance with Antidiscrimination Laws and Regulations

We completed a fair lending examination with this CRA examination. We identified no violations of substantive provisions of antidiscrimination laws and regulations.