



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## **PUBLIC DISCLOSURE**

November 26, 2007

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Indian River National Bank  
Charter Number: 18582

958 20th Place  
Vero Beach, FL 32960

Office of the Comptroller of the Currency

South Florida (Miami)  
9800 Northwest 41st Street Suite 120  
Miami, FL 33178

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

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## Overall CRA Rating

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

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

Performance Levels	Indian River National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to meeting the credit needs of the bank's assessment areas, given performance context.
- A good geographic distribution of loans, given performance context.
- A good distribution of loans by the income level of the borrower, given performance context.
- A high level of qualified investments when considering performance in the limited-scope assessment areas.
- Adequate retail delivery systems which are accessible to low- and moderate-income geographies.
- An excellent level of community development services, given the bank's size and capacity.

## Definitions and Common Abbreviations

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

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

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

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

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

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

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

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

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

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

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

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

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

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

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

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

## Description of Institution

Indian River National Bank (IRNB) is a community bank headquartered in Vero Beach, Florida. Established in 1985, IRNB is an intrastate bank operating 10 offices along Florida's Treasure and Space Coast, including Indian River and Brevard Counties. In January 2007 the bank opened its first office in St. Lucie County.

As of February 2004, IRNB became wholly owned by Alabama National Bank Corporation, a \$7.9 billion (as of June 30, 2007) bank holding company headquartered in Birmingham, Alabama. The bank and the holding company do not share a common management team. Affiliate investment activity conducted by the holding company on behalf of the bank was considered at this examination. The bank has one non-banking subsidiary that provides real estate management services and three affiliates that provide complementary services such as insurance. Neither subsidiary or affiliate activities impact the bank's ability to meet its CRA obligations.

IRNB is a full service financial institution offering a variety of loan and deposit products. Its strategic focus is residential mortgage lending, but the bank also offers a full range of business loan and deposit products. The majority of the bank's residential mortgage loan originations are sold on the secondary market.

As of September 30, 2007, total assets equaled \$787 million and total loans equaled \$510 million or 65 per cent of total assets. Deposits totaled \$561 million. Primary categories in the bank's loan portfolio consist of construction loans (35%), residential real estate loans (30%), commercial real estate loans (29%), commercial and industrial loans (3%), and consumer loans (2%). Various other loan types comprise the remaining 1 percent. Tier 1 Capital was \$59 million, which represents 7.5 percent of total assets.

There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs of its assessment areas. IRNB's performance was rated "Satisfactory" at its last CRA evaluation dated December 15, 2003.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

At the bank's request, it was evaluated as a Large Bank, as defined by the Community Reinvestment Act. This evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. In evaluating the bank's lending performance, we reviewed residential mortgage loans subject to filing under HMDA, small loans to businesses, and community development loans. Small loans to farms and multi-family housing loans reported under the HMDA were not analyzed as their number was not material.

With the exception of community development loans, the evaluation period for the Lending Test is January 1, 2003 through June 30, 2007. For community development loans, the Investment Test, and the Service Test, the evaluation period is December 15, 2003, the date of the last CRA evaluation, through November 26, 2007.

Because of the implementation of changes made by the Office of Management and Budget (OMB) to Metropolitan Statistical Area (MSA) designations, which became effective in 2004, the Lending Test evaluation period was divided into two segments:

January 1, 2003-December 31, 2003: Original OMB designations are used to identify assessment areas. During this portion of the evaluation period, Indian River County was not an MSA.

January 1, 2004-June 30, 2007: New OMB MSA designations are used in this analysis therefore assessment area names and demographics were different than those used in 2003. As of January 1, 2004, Indian River County was designated an MSA. Although the county still had no low-income geographies, as it did when it was a non-MSA area, the number of moderate-income geographies increased from one to four. (See "Selection of Areas for Full-Scope Review" discussion below for additional details.)

Lending activity was analyzed for both segments of the evaluation period, but for the purpose of the Core Tables in Appendix C, only the table for the January 1, 2004-June 30, 2007 segment is provided.

### Data Integrity

This evaluation is based on accurate data. We relied upon management's internal reviews as to the accuracy of the HMDA and CRA (small business) loan data. Community development loans, investments, and services submitted by management were verified to ensure that they met the regulatory definition of community development. Some items submitted for consideration were excluded from this evaluation because they did not meet the definition or purpose of community development.

Aggregate data provided by the FFIEC was used for HMDA market share information. The bank is not included in the small business loan aggregate data therefore market share and rank were manually calculated for Lending Activity analysis. It was not calculated for Geographic and Borrower distribution.

## **Selection of Areas for Full-Scope Review**

For the 2003 segment of the evaluation period, the bank had two assessment areas including all of non-MSA Indian River County and all of MSA 4900 (Melbourne-Titusville-Palm Bay, FL). Non-MSA Indian River County was selected for full-scope review. The county represented 68 percent of HMDA and small loans to businesses evaluated at this examination. The remaining assessment area received a limited-scope review.

For the 2004-2007 segment of the evaluation period, IRNB had three assessment areas including all of MSA 42680 (Sebastian-Vero Beach, FL), all of MSA 37340 (Melbourne-Titusville-Palm Bay, FL), and the St. Lucie County portion of MSA 38940 (Port St. Lucie-Ft. Pierce, FL). During 2004 and 2005, MSA 42680 was known as MSA 46940 (Vero Beach, FL), but the MSA boundaries did not change. In both instances, the MSA consisted only of Indian River County. The Core Tables in Appendix C specify MSA 42680, however it also includes activity during the time the MSA was designated MSA 46940.

The MSA 42680 assessment area was selected for full-scope review. The MSA represents 72 percent of the bank's deposits as of June 30, 2007 and 70 percent of HMDA and small loans to businesses evaluated in this segment of the evaluation period. The remaining assessment areas received limited-scope reviews.

Refer to Appendix A for additional information regarding full- and limited-scope reviews.

## **Ratings**

The bank's overall rating is based primarily on those areas that received full-scope reviews. Based on loan volumes, HMDA loan performance was more heavily weighted than performance related to small loans to businesses. In the 2003 segment of the evaluation period, HMDA loans represented 75 percent of loans analyzed and in the 2004-2007 segment, they represented 66 percent of loans analyzed.

## **Other**

Community credit needs in the assessment area were determined by reviewing recent housing and demographic information and community contacts conducted by the OCC in connection with other CRA examinations of banks operating in the same assessment area. We also reviewed the Comprehensive Plan for Indian River County and conducted a community contact with a governmental organization that helps to provide affordable housing in the assessment area.

The most critical needs identified were those associated with providing housing affordable for low- and moderate-income persons and families, including financing for infrastructure and construction and financing to allow for the purchase of affordable housing. There is also a stated need for financing for very small businesses and financial literacy and job training. The plan reviewed documented a need to rehabilitate sub-standard housing in Indian River County.

For additional information, see the Market Profile in Appendix B.

## **Fair Lending or Other Illegal Credit Practices Review**

We found no evidence of discrimination or other illegal credit practices inconsistent with helping to meet community credit needs.

## Conclusions with Respect to Performance Tests

### LENDING TEST

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

The bank's performance under the Lending Test is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Sebastian-Vero Beach assessment area is good

#### Lending Activity

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

IRNB's lending activity reflects good responsiveness to credit needs in its assessment area, given performance context and the size and capacity of the bank. Home mortgage loan lending activity reflects good responsiveness and small loans to businesses reflects excellent responsiveness, given performance context and the size and capacity of the bank.

Home mortgage lending activity is good, when the bank's deposit market share and rank is compared with its HMDA loan market share and rank, and considering the bank's size and capacity, as well as performance context. The bank's market share and rank of HMDA loans in the full-scope assessment area is lower than its deposit market share and rank in both segments of the evaluation period. However, competition from non-deposit taking HMDA lenders and large banks operating in the assessment area (many of whom are the largest mortgage lenders in the United States) makes it very difficult for the bank to have comparable deposit and HMDA loan market shares.

In 2006, the bank's deposit market share was 10.95 percent and it was ranked second among 17 financial institutions reporting deposits in the assessment area, based on FDIC data as of June 30, 2006. Based on aggregate HMDA lending data for 2006, IRNB had a HMDA loan market share of 2.97 percent and it was ranked eighth of 399 lenders reporting HMDA loans in the assessment area, of which 112 reported ten or more loans. However, with the exception of one lender, all of the lenders ranked before IRNB are either nation-wide or large regional banks or mortgage companies that are substantially larger than IRNB. The bank's market share for home purchase loans was 1.99 percent and it was ranked 12<sup>th</sup>. Its market share for refinance loans was 4.07 and it was ranked fifth. Performance in the 2003 segment of the evaluation period is consistent with the 2004-2007 segment.

Small business lending activity is excellent, when the bank's deposit market share is compared with its small business loan market share and considering performance context as well as the bank's business strategy. IRNB is primarily a consumer lender. The bank's market share and rank of small loans to businesses was lower than its deposit market share and rank. However, the large number of credit card lenders reporting small loans to businesses in the assessment area impacts the bank's performance.

In 2006, the bank's deposit market share was 10.95 percent in the assessment area and it was ranked second. Based on 2006 aggregate data, the bank's market share of small loans to businesses was 1.99 percent and it was ranked 11th among 56 loan reporters, based on number of loans. Based on dollar volume of loans, which is more indicative of the bank's performance because of the large number of credit card lenders in the market, the bank had a market share of 12.74 percent and was ranked second. Credit card lenders represent a substantial portion of the market. The top nine lenders reporting small business loans in the assessment area are credit card lenders. Combined, they have a market share of 86 percent, based on number of loans. If these credit card lenders are not considered, the bank would be ranked second in the number of small loans to businesses reported in 2006. Performance in the 2003 segment of the evaluation period is consistent with performance in the 2004-2007 segment.

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

The overall distribution of loans by income level of the geography is good, given performance context. The geographic distribution of both home mortgage loans and small loans to businesses is good, given performance context.

There are no low-income geographies in the bank's full-scope assessment area for either segment of the evaluation period. In the 2003 segment of the evaluation period there was one moderate-income geography. In the 2004-2007 segment of the evaluation period there are only four moderate-income geographies in the full-scope assessment area limiting the lending opportunities in a highly competitive market. In the moderate-income geographies there are approximately 19,900 owner-occupied housing units and in 2006, 399 lenders reported HMDA loans in the assessment area. The situation is similar for small loans to businesses. There are only 1,992 businesses operating in the full-scope assessment area's moderate-income geographies. In 2006, there were 56 lenders reporting small loans to businesses.

For home mortgage loans, our conclusions are based primarily on home purchase and refinance loan performance. Little weight was given to home improvement loans since they represent only about seven per cent of HMDA lending. Both segments of the evaluation period were analyzed and are discussed below. Less weight was given to 2003 performance since it represented only 37 percent of all home mortgage loans and 28 per cent of small loans to businesses evaluated here.

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

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

*The overall geographic distribution of home mortgage loans is good, given the performance context factors.* The geographic distribution of home purchase and refinance loans is good. The geographic distribution of home improvement loans is excellent.

*The geographic distribution of home purchase loans in the full-scope assessment area is good, given performance context.* In the 2003 segment of the evaluation period the bank did not report any home purchase loans in the moderate-income geography of the full-scope assessment area. During the 2004-2007 segment of the evaluation period, the percentage of the bank's home purchase loans in the moderate-income geographies of the full-scope assessment area was somewhat lower than the percentage of owner-occupied housing units in such geographies. The bank's market share of home purchase loans in the moderate-income geographies of the full-scope assessment area exceeds its overall market share of home purchase loans in the assessment area.

*The geographic distribution of home improvement loans in the full-scope assessment area is excellent.* In the 2003 segment of the evaluation period, the percent of the bank's home improvement loans in the moderate-income geography of the full-scope assessment area exceeds the percent of owner-occupied housing units in the geography. Also, the bank's market share of home improvement loans in the moderate-income geography of the full-scope assessment area exceeds IRNB's overall market share of home improvement loans in the full-scope assessment area. In the 2004-2007 segment of the evaluation period, the bank's percentage of home improvement loans in the full-scope assessment area's moderate income geographies is near to the percentage of owner-occupied housing units in those geographies and the bank's market share of home improvement loans in the assessment area's moderate-income geographies exceeds the bank's overall full-scope assessment area market share of home improvement loans.

*The overall geographic distribution of refinance loans in the full-scope assessment area is good, given performance context.* In both segments of the evaluation period, the percentage of the bank's refinance loans in moderate-income geographies of the full-scope assessment area is somewhat lower than the percentage of owner-occupied housing units in those geographies and IRNB's market share of refinance loans in the full-scope assessment area's moderate-income geographies exceeds its overall full-scope assessment area market share of refinance loans.

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

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

*The geographic distribution of small loans to businesses in the full-scope assessment area is good, given performance context.* In the 2003 segment of the evaluation period the percentage of IRNB's small loans to businesses in the assessment area's moderate-income geography was somewhat lower than the percentage of businesses located the geography. In the 2004-2007 segment of the evaluation period, the percentage of the bank's loans in the moderate-income geographies of the full-scope assessment area exceeded the percentage of businesses located in such geographies.

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

No unexplained, conspicuous gaps in lending were identified. We evaluated the lending distribution in the full-scope assessment area to determine if any unexplained conspicuous

gaps existed. We reviewed lending reports detailing the volume of HMDA and small loans to businesses in moderate-income geographies.

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

A substantial majority of the bank's home mortgage and small loans to businesses are within the bank's overall assessment area. In total, 96 percent by both number and dollar of IRNB loans are within its assessment area. By loan category, 96 percent by number and 95 percent by dollar of HMDA loans and 97 percent by both number and dollar of small loans to businesses are inside the bank's assessment area. This performance had a positive impact on the bank's overall geographic distribution analysis.

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

The overall distribution of loans by income level of the borrower is good, given the performance context factors discussed below. The borrower distribution of home mortgage loans is good and the borrower distribution of small loans to businesses is adequate.

For home mortgage loans, our conclusions are based primarily on home purchase and refinance loan performance. Little weight was given to home improvement loans since they represent only about seven per cent of HMDA lending. Both segments of the evaluation period were analyzed and are discussed below. Less weight was given to 2003 performance since it represented only 37 percent of all home mortgage loans and 28 per cent of small loans to businesses evaluated here.

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

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

*The borrower distribution of home mortgage loans is good, given the performance context factors.* The borrower distribution of home purchase loans is good and the borrower distribution of home improvement loans is adequate. The borrower distribution of refinance loans is excellent.

Conclusions are primarily based on lending to moderate-income borrowers. Beginning in 2003, home prices began to surge throughout the Treasure Coast and in the full-scope assessment area. The median price of an existing single-family home in the assessment area in 2003 was estimated to be approximately \$150,000 increasing to approximately \$210,000 in 2006. Thereafter, prices declined and at the end of the third quarter of 2007 the price approximates \$180,000, based on data from the Florida Association of Realtors. In 2003, the average cost of single-family new house construction was \$201,000, increasing to \$239,800 in 2006, according to construction building permit data. Community contacts indicate that little housing with prices that would meet the regulatory definition of affordable housing was constructed during the evaluation period.

HUD adjusted median family income levels did not keep pace with the increase in housing prices, increasing from \$41,400 in 2003 to \$55,500 in 2006 and declining to \$54,100 in 2007.

Such income levels make it extremely difficult for low-income families and some moderate-income families to purchase a home without some form of assistance. In addition, the assessment area's eight percent poverty rate further limits the ability of low-income families to become homeowners.

*The overall borrower distribution of home purchase loans in the full-scope assessment area is good, given performance context.* In the 2003 segment of the evaluation period, the percentage of home purchase loans to low-income borrowers in the full-scope assessment area is lower than the percent of low-income families. However, the bank's market share of home purchase loans to low-income borrowers in the full-scope assessment area exceeds its overall market share of full-scope assessment area home purchase loans. The percent of home purchase loans to moderate-income borrowers is near to the percent of moderate-income families in the assessment area and the bank's market share of home purchase loans to assessment area moderate-income borrowers exceeds its overall assessment area market share of home purchase loans.

In the 2004-2007 segment of the evaluation period, the percent of home purchase loans to low-income borrowers in the full-scope assessment area is significantly lower than the percent of low-income families in the full-scope assessment area and the bank's market share of home purchase loans to low-income borrowers in the full-scope assessment area is less than its overall assessment area market share of home purchase loans. The percent of home purchase loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families in the full-scope assessment area. The bank's market share of home purchase loans to moderate-income borrowers in the full-scope assessment area exceeds its overall full-scope assessment area market share of home purchase loans.

*The overall borrower distribution of home improvement loans in the full-scope assessment area is adequate, given performance context.* In the 2003 segment of the evaluation period, the percent of the bank's home improvement loans to low-income borrowers in the full-scope assessment area is lower than the percent of low-income families in the full-scope assessment area. The bank's market share of home improvement loans to low-income borrowers in the full-scope assessment area exceeds its overall assessment area market share of home improvement loans. For moderate-income borrowers, the percentage of the bank's home improvement loans exceeds the percentage of moderate-income families in the full-scope assessment area. The bank's market share of home improvement loans to moderate-income borrowers in the full-scope assessment area exceeds its overall full-scope assessment area market share of home improvement loans.

In the 2004-2007 segment of the evaluation period, the percentage of home improvement loans to both low-income and moderate-income borrowers in the full-scope assessment area is somewhat lower than the percentage of low- and moderate-income borrowers in the full-scope assessment area. The bank's market share of home improvement loans to low-income borrowers is less than its overall full-scope assessment area market share of home improvement loans and its market share of loans to moderate-income borrowers in the full-scope assessment area exceeds the bank's overall full-scope assessment area market share of home improvement loans.

*The overall borrower distribution of refinance loans in the full-scope assessment area is excellent, given performance context.* In the 2003 segment of the evaluation period, the

percent of refinance loans to low-income borrowers in the full-scope assessment area is lower than the percentage of low-income families in the full-scope assessment area. The percentage of refinance loans to moderate-income borrowers in the full-scope assessment area is somewhat lower than the percentage of moderate-income families in the full-scope assessment area. The bank's market share of refinance loans to low-income borrowers in the full-scope assessment area exceeds its overall full-scope assessment area market share of refinance loans and its market share of loans to moderate-income borrowers in the full-scope assessment area is near to its overall full-scope assessment area market share of refinance loans.

In the 2004-2007 segment of the evaluation period, the bank's percentage of refinance loans to low-income borrowers in the full-scope assessment area is lower than the percentage of low-income families in the full-scope assessment area. The percentage of refinance loans to moderate-income borrowers in the full-scope assessment area exceeds the level of moderate-income families in the full-scope assessment area. The bank's market share of refinance loans to both low- and moderate-income full-scope assessment area borrowers exceeds its overall full-scope assessment area market share of refinance loans.

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

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

*The borrower distribution of small loans to businesses in the full-scope assessment area is adequate.* In the 2003 segment of the evaluation period, the percentage of the bank's loans to small businesses (businesses with gross annual revenues equal to or less than \$1 million) in the assessment area exceeds the percentage of such businesses in the assessment area and the bank's assessment area market share of loans to small businesses exceeds its overall assessment area market share of small loans to businesses. During this segment of the evaluation period, 80 percent of the bank's small loans to businesses were for amounts of \$100,000 or less.

In the 2004-2007 segment of the evaluation period, the percentage of the bank's loans to small businesses (businesses with gross annual revenues equal to or less than \$1 million) in the assessment area is somewhat lower than the percentage of such businesses in the assessment area. During this segment of the evaluation period, 72 percent of the bank's small loans to businesses were for amounts of \$100,000 or less.

### **Community Development Lending**

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development lending.

Community development lending had a neutral impact on the Lending Test. During the evaluation period, the bank did not have any community development loans in the full-scope assessment area.

**Other Loan Data:** The bank showed its responsiveness to community needs during the evaluation period by issuing four Letters of Credit totaling \$193,000 for a non-profit affordable housing organization working in the full-scope assessment area. The Letters of Credit were to guarantee performance related to infrastructure and capital improvements for an affordable housing development in the full-scope assessment area. Without these Letters of Credit, the development, in a moderate-income geography, would not have been able to move forward. These Letters of Credit had a neutral impact on Lending Test conclusions.

### **Product Innovation and Flexibility**

The bank made limited use of innovative and flexible lending products that have the potential to benefit low- and moderate-income homebuyers. However, borrowers with incomes somewhat in excess of low- and moderate-income levels can also benefit from these programs. Innovative and flexible mortgage loan products were used in the full-scope assessment area. Product innovation and flexibility had a neutral impact on the Lending Test. Loans made under the program described below are included in the Geographic Distribution and Borrower Distribution analysis previously discussed.

#### **State Housing Initiative Partnership (SHIP) Loans**

During the entire evaluation period, SHIP loans were offered through IRNB's partnership with the lending consortium in Indian River County. The funds provide down payment and closing cost assistance. The underwriting of SHIP loans allows for expanded expense ratios, and non-traditional credit histories are accepted. Maximum purchase price and income limits apply. Applicable income can not exceed 100 percent of the HUD Median Family income for the MSA in which the home is being purchased.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Palm Bay-Melbourne-Titusville assessment area is not inconsistent with the bank's overall "high satisfactory" rating performance under the Lending Test. In the St. Lucie assessment area the bank's performance is weaker than the bank's overall performance however the bank has operated in that assessment area for less than one year and performance in this assessment area had no impact on our conclusions. Refer to Tables 1 through 13 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 the impact of the bank's strong performance in a limited-scope assessment area. Performance in the full-scope assessment area needs to improve based on the somewhat limited opportunities

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

Overall, the bank has an excellent level of qualified investments that are responsive to assessment area needs, addressing the most pressing need for housing affordable to low- and moderate-income families. Investments are not considered innovative or complex. Private investors routinely provide these types of qualified investments. Opportunities exist in the full-scope assessment area for the bank to make qualified investments. However, they are somewhat limited and competition for them is strong since many large nationwide and regional banks operate in the bank's assessment area. For a discussion of investment opportunities, see the Market Profile in Appendix B.

During the evaluation period, the bank had two regional investments totaling \$1.3 million that benefit all of the bank's assessment areas. These investments are mortgage-backed securities, for which the collateral is a pool of mortgage loans to low- and moderate-income borrowers. Mortgage-backed securities are important because they provide needed liquidity to lending institutions so that additional mortgages can be funded and they meet the identified need for affordable housing financing for low- and moderate-income families. The bank's holding company purchased these securities and allocated them to IRNB. Because these investments are secured by mortgages in all three of the bank's assessment areas, it is noted in Table 14 of Appendix C as a "Regional" investment. In reaching conclusions about investment performance in each of the assessment areas, consideration is given to the extent the assessment area benefits from the regional investments.

In addition, the bank had one out of assessment area investment for which it received consideration. This investment was a donation to assist in relief efforts for Hurricane Katrina.

**Current Period Investments:** Current period investments in the full-scope assessment area consist of one mortgage-backed security totaling \$192,000 and 51 donations totaling \$115,000 to various organizations whose activities meet the definition of community development. It is important to note that approximately 75 percent of donations went to organizations that meet affordable housing needs, the most critical need in the assessment area.

**Prior Period Investments:** There were no prior period investments in the full-scope assessment area.

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

In our analysis, the most weight is placed on the full-scope assessment areas in reaching overall conclusions. However, the very strong performance in the MSA 37340 (Palm Bay-Melbourne-Titusville) limited-scope assessment area had a positive impact on the overall Investment Test rating, raising it to "Outstanding". Performance in the MSA 37340 assessment area is not inconsistent with the overall "Outstanding" rating in the Service Test. Performance in the St. Lucie assessment area is inconsistent with the bank's overall "Outstanding" rating in the Service Test, but it had no impact on overall conclusions because of the limited amount of time the bank has operated in the assessment area. Performance in that assessment area is weaker than the bank's overall performance. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

IRNB's performance under the Service Test is rated "High Satisfactory", when considering the excellent level of community development services. The bank's performance in the full-scope assessment area is good. Delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the full-scope assessment area. The bank provides an excellent level of community development services that are very responsive to the critical needs in the assessment area.

### Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

IRNB's delivery systems are adequate and reasonably accessible to geographies and individuals of different income levels throughout the full-scope assessment area. The bank does not have any branches located in the moderate-income geographies of the full-scope assessment area. (The assessment area contains no low-income geographies.) However, it should be noted that when Indian River County was not an MSA, only one geography was designated moderate-income. When the county became an MSA in 2004, four moderate-income geographies were identified. Two offices (Main office and Plantation branch) are adjacent to what are now moderate-income geographies in the full-scope assessment area and two branches in the full-scope assessment area are adjacent to a moderate-income geography in the MSA 37340 (Palm Bay-Melbourne-Titusville) limited-scope assessment area.

Branch openings/closings have not affected the accessibility of delivery systems in the full-scope assessment areas. During the overall evaluation period, no branch offices were opened or closed in the full-scope assessment area. The one additional branch since the last examination was acquired when the bank became part of Alabama National BanCorporation in February 2004.

A wide range of banking products and services are offered throughout the full-scope assessment area, as described in the bank's Public File. Of particular note is the free consumer checking account offered by the bank, which has only a \$50 minimum deposit to open the account, and the free business checking account. The bank has approximately 5,000 free personal checking accounts and approximately 2,700 free business checking accounts in the full-scope assessment area. Products, services and business hours are reasonable and comparable among branch locations. Branches provide extended hours on Fridays and Saturday mornings.

ATM facilities at all branch locations offer an alternative method of providing retail banking services. In addition, the bank offers telephone and on-line banking. There is no data as to the impact of these alternative delivery systems on low- and moderate-income persons therefore no significant weight was given to these systems. However, the bank offers courier delivery service to business accounts. Of the 57 accounts using this delivery system, 17, or 29 percent, are located in moderate-income geographies.

## Community Development Services

Overall, community development service performance is excellent, considering the responsiveness of the activities and the capacity of the bank.

IRNB provided an excellent level of community development services in the full-scope assessment area, considering the size and capacity of the bank. Efforts are primarily devoted to organizations that provide affordable housing, a pressing need in the full-scope assessment area. During the evaluation period, six different officers and employees provided technical assistance to four organizations that provide affordable housing to low- and moderate-income persons and families, including facilities for the homeless. They did so by serving as directors or board and committee members, using their financial expertise to help manage and raise funds for these organizations. In addition, approximately 20 employees helped to provide financial literacy training during the evaluation period through these and other community development organizations operating in the full-scope assessment area. This training included home buyer training, credit training, and more recently, foreclosure avoidance training. Home buyer training courses cover the pre-home buying process including the mortgage application process, realtor relations, insurance needs, credit and budgeting, appraisals and inspections, and available subsidy programs. Throughout the evaluation period, IRNB officers served on both the Indian River County Lending Consortium and the Indian River County CRA Roundtable. Lenders participating in these activities provide loans under the state's SHIP program and work to provide training programs and solve affordable housing needs in the county.

Of particular note is the technical assistance provided by the IRNB CRA officer related to applications for direct grants under the Affordable Housing Program (AHP) of the Federal Home Loan Bank of Atlanta (FHLBA) on behalf of an assessment area non-profit that specializes in constructing housing that is affordable to low- and moderate-income families. IRNB submitted three applications for AHP grants that would provide infrastructure and construction cost subsidies, reducing the price of each of the homes. All three grants, totaling \$375,000, were awarded and will assist the organization in building a total of 64 single-family owner-occupied units that are affordable to low- and moderate-income families. One of the grants has been funded, and as construction progresses the remaining two grants will be funded. For IRNB, participation in AHP grant process is complex, requiring administrative time on the part of the sponsoring bank because it must administer and disburse the funds as well as monitor the project and provide documentation to the FHLBA.

Also, four employees assisted in the Indian River County Bridge Loan Program in 2004. The program was established to allow small businesses to borrow funds, on a short-term basis, to recover from damages due to the 2004 hurricanes. Indian River County was part of the federal disaster area in Florida. Also, throughout the evaluation period, two employees used their financial expertise to manage fund raising efforts for a non-profit organization that provides health care services to low- and moderate-income mothers and infants.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the MSA 37340 (Palm Bay-Melbourne-Titusville, FL) assessment area was inconsistent with the bank's

overall “High Satisfactory” performance under the Service Test. Performance in this assessment area was stronger than the bank’s overall performance. Performance in the St. Lucie assessment area is inconsistent with the bank’s overall “High Satisfactory” performance under the Service Test. Performance in this assessment area was weaker than the bank’s overall “High Satisfactory” performance however the bank has only been operating in this assessment area since January 2007. Performance in the limited-scope assessment areas had a neutral impact on the overall Service Test conclusion. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): 01/01/03 to 06/30/07 Investment and Service Tests and CD Loans: (12/15/03 to 11/26/07)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Indian River National Bank Vero Beach, FL	Home mortgage loans, small loans to businesses and community development loans. Investments.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Alabama National BanCorpration	Owners	Investments
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Sebastian-Vero Beach, FL #42680	Full-Scope	
Melbourne-Titusville-Palm Bay) #37340	Limited Scope	
St. Lucie County	Limited Scope	

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

### MSA 42680 (Sebastian-Vero Beach, FL)

Demographic Information for Full Scope Area: MSA 42680 (Sebastian-Vero Beach)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.00	17.39	56.52	26.09	0.00
Population by Geography	112,947	0.00	16.49	61.66	21.84	0.00
Owner-Occupied Housing by Geography	38,119	0.00	13.47	61.60	24.93	0.00
Business by Geography	14,586	0.00	12.90	60.16	26.94	0.00
Farms by Geography	644	0.00	14.75	63.66	21.58	0.00
Family Distribution by Income Level	32,901	17.61	19.63	22.39	40.37	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,252	0.00	22.26	66.07	11.67	0.00
Median Family Income HUD Adjusted Median Family Income for 2007 Households Below Poverty Level		46,603 55,500 8%	Median Housing Value Unemployment Rate (2000 US Census)		129,634 1.89%	

The Sebastian-Vero Beach MSA full-scope assessment area is equivalent to Indian River County. The MSA is growing with the population having increased 25 percent between the 1990 and 2000 Census. There are no low-income geographies in the MSA and only four moderate-income geographies, which were designated in 2004 when the county became an MSA.

When compared with income levels, housing costs in the MSA were very high during most of the evaluation period, but have declined recently, as discussed in the Borrower Distribution portion of this document. It is clear that the purchase of single family housing in the MSA is difficult for low- income families as well as some moderate-income families. Insurance and tax expenses also impact affordability, as does the decline in the amount of SHIP funds available to assist low- and moderate-income home buyers.

The local economy relies heavily on tourism and agriculture, although general aviation manufacturer Piper Aircraft and Velocity Aircraft have moved into the county. Citrus production is a key component of the local economy and requires the use of migrant labor during peak harvesting season. Primary employers include the school district, the county, hospitals, and the local supermarket chain, Publix.

The primary credit needs identified through community contacts conducted for this examination and for other examinations of banks operating in the same assessment area are financing for

low- and moderate-income families to purchase affordable housing, financing for the construction of single-family affordable housing, and financing for the repair or rehabilitation of existing housing. There is also a need for financial literacy and job training.

Opportunities for the bank to make community development loans and investments are somewhat limited competition for them is strong, based on the number of financial institutions operating in the MSA. The county has established an Enterprise Zone but the primary focus is attracting larger businesses that will provide higher paying jobs.

Community development opportunities include working with and providing financing to the several organizations whose mission is to provide affordable housing as well as the many organizations that help to supply community services for low- and moderate-income persons. Types of community development investments available in the MSA include, but are not limited to, the purchase of mortgage-backed and SBA loan-backed securities, participation in state-wide or regional investment funds, and opportunities to contribute to qualified non-profit organizations whose missions are focused on providing affordable housing, community services for low- and moderate-income persons, and economic development. During the evaluation period the availability of mortgage-backed securities declined as fewer low- and moderate-income families were able to purchase homes because of increasingly higher prices.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_\_12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

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

Market share information is presented based on the most recent aggregate market data available.

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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

Institution ID: INDIAN RIVER NATIONAL

BANK (1000018582) (Included)

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2007				
MA/Assessment Area (2007):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 42680 (Sebastian-Ve Beach)	69.82	1,022	178,037	487	56,789	4	749	0	0	1,513	235,575	72.46
<b>Limited Review:</b>												
St Lucie County	4.94	66	11,177	40	7,536	0	0	1	750	107	19,463	1.40
MSA 37340 (Palm Bay-Melbourne-Titusville)	25.24	364	57,112	181	31,026	0	0	2	1,000	547	88,138	26.14

\* Loan Data as of June 30, 2007. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from December 15, 2003 to November 26, 2007.

\*\*\* Deposit Data as of June 30, 2007. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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BANK (10000018582) (Included)

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2007					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
MSA 42680 (Sebastian-Vero Beach)	488	70.62	0.00	0.00	13.47	9.84	61.60	62.30	24.93	27.87	1.38	0.00	2.07	1.26	1.45	
<b>Limited Review:</b>																
St Lucie County	24	3.47	2.00	0.00	14.69	16.67	71.64	66.67	11.66	16.67	0.03	0.00	0.08	0.02	0.11	
MSA 37340 (Palm Bay-Melbourne-Titusville)	179	25.90	0.62	1.12	17.75	17.32	49.76	50.28	31.87	31.28	0.07	0.00	0.23	0.05	0.07	

\* Based on 2007 Peer Mortgage Data (Eastern)

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

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

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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BANK (10000018582) (Included)

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

Geographic Distribution: HOME IMPROVEMENT		Geography: FLORIDA								Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2007					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 42680 (Sebastian-Vero Beach)	76	71.70	0.00	0.00	13.47	13.16	61.60	59.21	24.93	27.63	3.58	0.00	4.41	3.54	3.13
<b>Limited Review:</b>															
St Lucie County	8	7.55	2.00	0.00	14.69	25.00	71.64	62.50	11.66	12.50	0.13	0.00	0.00	0.08	1.00
MSA 37340 (Palm Bay-Melbourne-Titusville)	22	20.75	0.62	0.00	17.75	59.09	49.76	36.36	31.87	4.55	0.23	0.00	0.52	0.26	0.00

\* Based on 2007 Peer Mortgage Data (Eastern)

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

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

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: INDIAN RIVER NATIONAL

BANK (10000018582) (Included)

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

Geographic Distribution: HOME MORTGAGE REFINANCE 2007			Geography: FLORIDA						Evaluation Period: JANUARY 1, 2004 TO JUNE 30,						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 42680 (Sebastian-Vero Beach)	455	69.79	0.00	0.00	13.47	10.33	61.60	67.91	24.93	21.76	2.87	0.00	3.70	2.97	2.03
<b>Limited Review:</b>															
St Lucie County	34	5.21	2.00	2.94	14.69	14.71	71.64	67.65	11.66	14.71	0.11	0.00	0.23	0.08	0.31
MSA 37340 (Palm Bay-Melbourne- Titusville)	163	25.00	0.62	0.00	17.75	19.02	49.76	49.69	31.87	31.29	0.22	0.00	0.25	0.22	0.20

\* Based on 2007 Peer Mortgage Data (Eastern)

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

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

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: INDIAN RIVER NATIONAL

BANK (10000018582) (Included)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2007					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
MSA 42680 (Sebastian-Vero Beach)	3	100.00	0.00	0.00	18.93	66.67	45.98	0.00	35.08	33.33	20.00	0.00	0.00	0.00	50.00	
<b>Limited Review:</b>																
St Lucie County	0	0.00	4.74	0.00	17.35	0.00	33.07	0.00	44.85	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 37340 (Palm Bay-Melbourne- Titusville)	0	0.00	2.10	0.00	26.13	0.00	53.00	0.00	18.77	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2007 Peer Mortgage Data (Eastern)

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

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

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

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BANK (10000018582) (Included)

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA								Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2007					
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 42680 (Sebastian-Vero Beach)	487	68.79	0.00	0.00	12.90	16.84	60.16	60.99	26.94	22.18	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
St Lucie County	40	5.65	4.97	12.50	21.28	25.00	65.10	52.50	8.65	10.00	0.00	0.00	0.00	0.00	0.00
MSA 37340 (Palm Bay-Melbourne-Titusville)	181	25.56	1.31	0.00	24.50	37.57	44.92	44.20	29.27	18.23	0.00	0.00	0.00	0.00	0.00

\* Based on 2007 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2007).

Institution ID: INDIAN RIVER NATIONAL

BANK (10000018582) (Included)

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS 2007		Geography: FLORIDA								Evaluation Period: JANUARY 1, 2004 TO JUNE 30,					
MA/Assessment Area:	Total Small Farm Loans		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
<b>Full Review:</b>															
MSA 42680 (Sebastian-Vero Beach)	4	100.00	0.00	0.00	14.75	0.00	63.66	100.00	21.58	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
St Lucie County	0	0.00	3.53	0.00	20.73	0.00	72.08	0.00	3.65	0.00	0.00	0.00	0.00	0.00	0.00
MSA 37340 (Palm Bay-Melbourne- Titusville)	0	0.00	1.05	0.00	19.90	0.00	51.89	0.00	27.15	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2007 Peer Small Business Data -- US and PR

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

\*\*\* Source Data - Dun and Bradstreet (2007).

Institution ID: INDIAN RIVER NATIONAL

BANK (10000018582) (Included)

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

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2007					Market Share				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families*	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****						
<b>Full Review:</b>																
MSA 42680 (Sebastian-Vero Beach)	488	70.62	17.61	1.94	19.63	16.13	22.39	20.00	40.37	61.94	1.72	0.00	3.32	1.44	1.65	
<b>Limited Review:</b>																
St Lucie County	24	3.47	21.01	0.00	21.32	4.55	23.75	27.27	33.91	68.18	0.04	0.00	0.00	0.00	0.06	
MSA 37340 (Palm Bay-Melbourne-Titusville)	179	25.90	18.27	8.77	19.30	13.45	22.67	25.15	39.76	52.63	0.09	0.00	0.09	0.11	0.08	

\* Based on 2007 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 4.8% of loans originated and purchased by bank.

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

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

\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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BANK (10000018582) (Included)

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

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA								Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2007					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 42680 (Sebastian-Vero Beach)	76	71.70	17.61	11.27	19.63	15.49	22.39	23.94	40.37	49.30	3.42	0.00	4.30	2.80	3.93
<b>Limited Review:</b>															
St Lucie County	8	7.55	21.01	0.00	21.32	28.57	23.75	14.29	33.91	57.14	0.14	0.00	0.35	0.00	0.15
MSA 37340 (Palm Bay-Melbourne-Titusville)	22	20.75	18.27	0.00	19.30	33.33	22.67	28.57	39.76	38.10	0.24	0.00	0.00	0.54	0.19

\* Based on 2007 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 6.6% of loans originated and purchased by bank.

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

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

\*\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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BANK (10000018582) (Included)

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

Borrower Distribution: HOME MORTGAGE REFINANCE				Geography: FLORIDA				Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2007							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families*	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans**	Overa ll	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 42680 (Sebastian-Vero Beach)	455	69.79	17.61	7.04	19.63	20.66	22.39	30.52	40.37	41.78	3.27	5.04	3.73	3.93	2.49
<b>Limited Review:</b>															
St Lucie County	34	5.21	21.01	9.38	21.32	9.38	23.75	34.38	33.91	46.88	0.13	0.44	0.06	0.07	0.17
MSA 37340 (Palm Bay-Melbourne-Titusville)	163	25.00	18.27	10.39	19.30	22.73	22.67	28.57	39.76	38.31	0.26	0.29	0.29	0.30	0.20

\* Based on 2007 Peer Mortgage Data (Eastern)

\*\* As a percentage of loans with borrower income information available. No information was available for 6.1% of loans originated and purchased by bank.

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

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

\*\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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BANK (10000018582) (Included)

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

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: FLORIDA			Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2007	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
MSA 42680 (Sebastian-Vero Beach)	487	68.79	66.98	51.33	72.07	15.40	12.53	0.00	0.00
<b>Limited Review:</b>									
St Lucie County	40	5.65	70.50	45.00	62.50	10.00	27.50	0.00	0.00
MSA 37340 (Palm Bay-Melbourne- Titusville)	181	25.56	67.47	34.81	57.46	20.44	22.10	0.00	0.00

\* Based on 2007 Peer Small Business Data -- US and PR

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2007).

\*\*\*\* 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 21.47% of small loans to businesses originated and purchased by the bank.

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BANK (10000018582) (Included)

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS					Geography: FLORIDA			Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2007	
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
MSA 42680 (Sebastian-Vero Beach)	4	100.00	91.46	0.00	25.00	50.00	25.00	0.00	0.00
<b>Limited Review:</b>									
St Lucie County	0	0.00	91.76	0.00	0.00	0.00	0.00	0.00	0.00
MSA 37340 (Palm Bay-Melbourne-Titusville)	0	0.00	98.02	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2007 Peer Small Business Data -- US and PR

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

<sup>\*\*\*</sup> Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2007).

<sup>\*\*\*\*</sup> 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 75.00% of small loans to farms originated and purchased by the bank.

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BANK (10000018582) (Included)

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2004 TO JUNE 30, 2007			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 42680 (Sebastian-Vero Beach)	0	0	52	307	52	307	4.83	0	0
Regional	0	0	2	1,272	2	1,272	19.99		
Out of Assessment Area	0	0	1	10	1	10	0.16		
<b>Limited Review:</b>									
St Lucie County	0	0	2	2	2	2	0.03	0	0
MSA 37340 (Palm Bay-Melbourne-Titusville)	3	3,437	15	1,334	18	4,771	74.99	0	0

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

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

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BANK (10000018582) (Included)

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS 2004 TO JUNE 30, 2007								Geography: FLORIDA				Evaluation Period: JANUARY 1,					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				%b of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
MSA 42680 (Sebastian-Vero Beach)	72.46	5	50.00	0.00	0.00	80.00	20.00	0	0	0	0	0	0	0.00	16.49	61.66	21.84
<b>Limited Review:</b>																	
St Lucie County	1.40	1	10.00	0.00	0.00	100.00	0.00	1	0	0	0	+1	0	5.93	19.78	65.39	8.89
MSA 37340 (Palm Bay-Melbourne- Titusville)	26.14	4	40.00	0.00	50.00	50.00	0.00	0	0	0	0	0	0	1.34	19.21	51.27	28.17

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BANK (10000018582) (Included)

**MSA 111 (St Lucie)**

Demographic Information for Limited Scope Area: MSA 111 (St Lucie)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	36	8.33	25.00	55.56	11.11	0.00
Population by Geography	192,695	5.93	19.78	65.39	8.89	0.00
Owner-Occupied Housing by Geography	60,035	2.00	14.69	71.64	11.66	0.00
Business by Geography	20,895	4.97	21.28	65.10	8.65	0.00
Farms by Geography	849	3.53	20.73	72.08	3.65	0.00
Family Distribution by Income Level	54,308	21.01	21.32	23.75	33.91	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	22,990	9.19	22.46	62.34	6.01	0.00
Median Family Income		45,503	Median Housing Value		81,459	
HUD Adjusted Median Family Income for 2007		54,600	Unemployment Rate (2000 US Census)		2.19%	
Households Below Poverty Level		11%				

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

Source: 2000 US Census and 2007 HUD updated MFI

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BANK (10000018582) (Included)

**MSA 42680 (Sebastian-Vero Beach)**

Demographic Information for Full Scope Area: MSA 42680 (Sebastian-Vero Beach)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	23	0.00	17.39	56.52	26.09	0.00
Population by Geography	112,947	0.00	16.49	61.66	21.84	0.00
Owner-Occupied Housing by Geography	38,119	0.00	13.47	61.60	24.93	0.00
Business by Geography	14,586	0.00	12.90	60.16	26.94	0.00
Farms by Geography	644	0.00	14.75	63.66	21.58	0.00
Family Distribution by Income Level	32,901	17.61	19.63	22.39	40.37	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,252	0.00	22.26	66.07	11.67	0.00
Median Family Income		46,603	Median Housing Value		129,634	
HUD Adjusted Median Family Income for 2007		55,500	Unemployment Rate (2000 US Census)		1.89%	
Households Below Poverty Level		8%				

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

Source: 2000 US Census and 2007 HUD updated MFI

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BANK (10000018582) (Included)

**MSA 37340 (Palm Bay-Melbourne-Titusville)**

Demographic Information for Limited Scope Area: MSA 37340 (Palm Bay-Melbourne-Titusville)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	92	2.17	20.65	47.83	29.35	0.00
Population by Geography	476,230	1.34	19.21	51.27	28.17	0.00
Owner-Occupied Housing by Geography	147,878	0.62	17.75	49.76	31.87	0.00
Business by Geography	51,228	1.31	24.50	44.92	29.27	0.00
Farms by Geography	1,613	1.05	19.90	51.89	27.15	0.00
Family Distribution by Income Level	133,389	18.27	19.30	22.67	39.76	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	50,110	2.35	27.20	53.10	17.35	0.00
Median Family Income		47,642	Median Housing Value		93,117	
HUD Adjusted Median Family Income for 2007		57,300	Unemployment Rate (2000 US Census)		2.25%	
Households Below Poverty Level		9%				

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

Source: 2000 US Census and 2007 HUD updated MFI