



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

City National Bank of Florida
Charter Number: 15977

25 West Flagler Street
Miami, FL 33130-0000

Office of the Comptroller of the Currency

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

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated Outstanding.

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

Performance Levels	City National Bank of Florida Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
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 activity that reflects good responsiveness to the credit needs of the bank’s assessment areas.
- Excellent geographic distribution of loans with a substantial majority of loans being within the bank’s assessment area.
- Adequate distribution of loans among borrowers of different income levels and businesses of different sizes.
- An excellent level of community development loans that is strong enough to positively impact the overall Lending Test rating.
- An excellent level of qualified investments responsive to assessment area needs.
- Service delivery systems that are readily accessible to geographies and individuals of different income levels and a good level of community development services.

Definitions and Common Abbreviations

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

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

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

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

City National Bank of Florida (CNBF) is an intrastate commercial bank headquartered in Miami Florida. The bank is wholly owned by City National Bancshares, Inc., a bank holding company also headquartered in Miami. During the evaluation period, 83 percent of the holding company was sold to CM Florida Holdings, Inc. of Coral Gables. In turn, CM Florida Holdings, Inc. is wholly owned by Caja Madrid Cileles S.A., which is wholly owned by Caja de Ahorros y Monte de Piedad de Madrid (Caja Madrid) headquartered in Madrid, Spain. The remaining 17 percent of City National Bancshares, Inc. is privately owned. The bank has no operating subsidiaries.

As of March 31, 2009, CNBF had total assets of \$4.7 billion. Deposits totaled \$2.8 billion and the total loan portfolio, which represents 43% of total assets, was \$2.0 billion. The loan to deposit ratio was 71 percent. Components of the bank's loan portfolio include commercial real estate loans (30 percent), construction loans (27 percent), residential real estate loans (21 percent), commercial and industrial loans (15 percent), and other loans, including consumer loans, (7 percent). Tier 1 capital totaled \$300 million as of March 31, 2009.

The bank's strategic focus is commercial real estate lending, corporate cash management, and private banking. In order to meet its CRA obligations, CNBF originates small loans to businesses and uses its real estate lending expertise to originate community development loans. In addition, the bank established a residential mortgage loan department that specializes in loans to low- and moderate-income borrowers. CNBF originates and purchases its residential mortgage loans.

CNBF offers a full range of financial products and services through a 20- branch network in Miami-Dade (13), Broward (2), and Palm Beach (3) Counties as well as a new branch located in Central Florida (Altamonte Springs) and one on the Treasure Coast (Palm City). Miami-Dade County represents the core of the bank's business, with 91percent of total deposits as of June 30, 2008 and 78 percent of loans analyzed as part of this examination.

There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs of its assessment area. The bank's rating at the last CRA examination, dated April 6, 2006, was "Outstanding".

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending, Investment and Service Tests. In evaluating the bank's lending performance, we reviewed residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA), small loans to businesses subject to filing under the CRA, and community development loans. We also evaluated community development investments and community development services.

The bank did not report any small loans to farms during the evaluation period. Therefore, tables for this product are not included in the Core Tables of this report (Appendix C). Home improvement loans and multi-family housing loans were not meaningful to overall performance due to low activity levels and no analysis was conducted. Also, the bank's market share of home mortgage loans and small loans to businesses is not significant enough to perform a meaningful analysis. As a result, we did not consider market share data in evaluating the bank's geographic and borrower distribution of loans.

With the exception of community development loans, the evaluation period for the Lending Test is January 1, 2006 through December 31, 2008. For community development loans, the Investment Test, and the Service Test, the evaluation period is April 6, 2006, the date of the last CRA evaluation, through May 18, 2009. Our conclusions related to community development loans and qualified investments are based on the number and dollar amounts made during the evaluation period. In addition, we considered the level of innovation, complexity, responsiveness to community credit needs and the degree to which these instruments are not routinely provided by private investors.

Data Integrity

This evaluation is based on accurate data. A sample of HMDA and small loans to business data was drawn to determine the accuracy of data. No errors were noted for the HMDA data however some minor errors were noted in the data for small loans to businesses. The data was corrected and then used at this examination. Community development loans, investments and services submitted by management were verified to ensure they met the regulatory definition for community development. Some items submitted for consideration were excluded from this evaluation because they did not meet the definition or purpose of community development.

Selection of Areas for Full-Scope Review

The bank currently has three assessment areas in Florida. The MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area will receive a full-scope review. MSA 33100 is comprised of three Metropolitan Divisions (MDs), including: MD 33124 (Miami-Miami Beach-Kendall, FL) which consists of Miami-Dade County, MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL) which consists of Broward County, and MD 48424 (West Palm Beach-

Boca Raton-Boynton Beach, FL) which consists of Palm Beach County. Each MD is referred to hereafter by its county name and is analyzed separately.

The remaining two assessment areas, which include MSA 38940 (Port St. Lucie-Fort Pierce, FL) comprised of Martin and St. Lucie Counties, and a portion of MSA 36740 (Orlando-Kissimmee, FL) including only Orange and Seminole Counties were not used in the examination. These assessment areas were only added in 2008 therefore there is not sufficient activity for meaningful analysis or conclusions. Performance in these assessment areas did not impact our conclusions or the bank's rating. Refer to Appendix A for additional information regarding the assessment area receiving a full- scope review.

Ratings

The bank's overall rating is based on conclusions for the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area. These conclusions are a consolidation of conclusions reached for each of the MDs that comprises the MSA. We placed the most weight on performance in Miami-Dade County. Miami-Dade County represents 91 percent of the deposits in the overall MSA and 78 percent of lending activity.

Under the Lending Test, somewhat more weight was given to business loans. Commercial lending is the bank's primary business strategy and small loans to businesses represent 60 percent of lending activity analyzed at this examination. In addition, regarding home mortgage loans, somewhat more weight was given to home purchase loans, which represent 58 percent of mortgage lending activity.

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 this and other CRA examinations of banks operating in the same assessment area. For this examination, we conducted a community contact with a non-profit community organization that primarily focuses on providing financial literacy and public assistance information to low- and moderate-income residents of Miami-Dade County through partnership with other non-profits and its own system of information centers located throughout the county. The most critical need identified by the organization is financial literacy training, including credit and foreclosure assistance, and programs and products directed toward the un-banked. The organization also noted the increased need for assistance to homeless individuals and families resulting from the high level of foreclosures in the county.

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

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory 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 "Outstanding". Based on a full-scope review, the bank's performance in the overall MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) is excellent. Performance is excellent in Broward and Miami-Dade Counties, and good in Palm Beach County.

Lending Activity

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

Overall, the bank's lending activity reflects good responsiveness to assessment area credit needs, given performance context. Overall, the bank's lending activity in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is good, given performance context. Lending activity is good in Broward, Miami-Dade, and Palm Beach Counties, given performance context.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Overall, lending activity in Broward County is good, given performance context. Lending activity is adequate for home mortgage loans and excellent for small loans to businesses, given performance context.

Considering performance context, home mortgage lending activity is adequate. CNBF's market share and rank for home mortgage loans is significantly lower than its deposit market share and rank for a comparable period however this performance is adequate when consideration is given to several performance context factors. CNBF is not a traditional retail focused institution and it does not actively market a variety of home mortgage products as do other lenders in the assessment area. Mortgage lending is not a primary business line, with the exception of the bank's City Smart Community Mortgage product, which focuses on mortgage loans to low-and moderate-income borrowers. The bank's primary business strategy is business lending.

In addition, the assessment area is highly competitive with a large number of lenders reporting home mortgage loan activity. These lenders include multiple non-bank lenders that do not take deposits in the assessment area as well as large banks with a nationwide presence that offer a wide variety of home mortgage loan products including some that are specifically directed to low-and moderate borrowers and those purchasing homes in low- and moderate-income geographies. For a further discussion on performance context issues, please see the Market Profile in Appendix B. For further discussion on the City Smart Community Mortgage product please see the Product Innovation and Flexibility section of the Lending Test.

FDIC data as of June 30, 2007 shows that CNBF had a deposit market share of .31 percent and was ranked 35th among 62 financial institutions reporting deposits in Broward County. Deposit market share is dominated by Bank of America and Wachovia who rank 1st and 2nd respectively and have a combined deposit market share of 44 percent.

For home purchase loans, CNBF's market share (by number), based on aggregate data from 2007 (the most recent data available) is .04 percent, and the bank is ranked 142nd of 527 lenders reporting such loans in Broward County. For refinance loans, the bank has a market share of .07 percent (by number) and is ranked 114th of 569 lenders reporting such loans in Broward County. For both home mortgage products the top 10 lenders represent the majority of market share. For home mortgage loans, the top 10 lenders represent 57 percent of all loans reported and for refinance loans they represent 52 percent of loans reported.

Lending activity for small loans to businesses is excellent. The bank's market share and rank of small loans to businesses exceeds its deposit market share and rank for a comparable period. Based on 2007 aggregate data (the most recent that is available) the bank's market share of small loans to businesses is .60 percent (based on dollar volume) and the bank is ranked 22nd of 145 lenders reporting such loans in the county. Market share and rank are based on the dollar volume of loans rather than number of loans because of the inclusion of credit card lenders in the reporting. Credit card lenders originate a large number of loans, but the dollar volume is significantly smaller. For example, the top six reporters of small loans to businesses are all credit card lenders that combined have a market share of 85 percent based on number of loans but only 39 percent based on dollar volume. Therefore, a comparison based on dollar volume of loans is more meaningful.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

Overall, lending activity in Miami-Dade County is good, given the same performance context factors discussed for Broward County. Lending activity is adequate for home mortgage loans, given performance context. Lending activity for small loans to businesses is good, given performance context.

Considering performance context, home mortgage lending activity is adequate. CNBF's market share and rank for home mortgage loans is significantly lower than its deposit market share and rank for a comparable period however this performance is adequate when consideration is given to the same performance context factors discussed for Broward County.

FDIC data as of June 30, 2007 shows that CNBF had a deposit market share of 2.41 percent and was ranked 11th among 75 financial institutions reporting deposits in Miami-Dade County. Deposit market share is dominated by Wachovia and Bank of America who rank 1st and 2nd respectively and have a combined deposit market share of 35 percent.

For home purchase loans, CNBF's market share (by number), based on aggregate data from 2007 (the most recent data available) is .10 percent, and the bank is ranked 86th of 476 lenders reporting such loans in Miami-Dade County. For refinance loans, the bank has a market share of .07 percent (by number) and is ranked 110th of 560 lenders reporting such loans in Miami-Dade County. For both home mortgage products the top 10 lenders represent the majority of market share. For home mortgage loans, the top 10 lenders represent 60

percent of all loans reported and for refinance loans they represent 54 percent of loans reported.

Given performance context, particularly economic conditions during the evaluation period and the high level of competition in the county, the bank's market share and rank for small loans to businesses is good even though the bank's market share and rank for such loans is somewhat lower than its deposit market share and rank. Based on 2007 aggregate data (the most recent that is available) the bank's market share of loans to small businesses is 1.85 percent (based on dollar volume) and the bank is ranked 16th of 140 lenders reporting such loans in Miami-Dade County. Market share and rank are based on the dollar volume of loans rather than number of loans because of the inclusion of credit card lenders in the reporting. Credit card lenders originate a large number of loans, but the dollar volume is significantly smaller. For example, the top six reporters of small loans to businesses are all credit card lenders that combined have a market share of 83 percent based on number of loans but only 30 percent based on dollar volume. Therefore, a comparison based on dollar volume of loans is more meaningful.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Overall, lending activity in the Palm Beach County is good, given performance context. Lending activity is adequate for home mortgage loans and excellent for small loans to businesses, given performance context.

Considering performance context, home mortgage lending activity is adequate. CNBF's market share and rank for home mortgage loans is significantly lower than its deposit market share and rank for a comparable period, however this performance is considered adequate when consideration is given to the same performance context factors discussed for Broward County.

FDIC data as of June 30, 2007 shows that CNBF had a deposit market share of .27 percent and was ranked 38th among 66 financial institutions reporting deposits in Palm Beach County. Deposit market share is dominated by Wachovia and Bank of America who rank 1st and 2nd respectively and have a combined deposit market share of 35 percent.

For home purchase loans, CNBF's market share (by number), based on aggregate data from 2007 (the most recent data available) is .04 percent, and the bank is ranked 145th of 532 lenders reporting such loans in the county. For refinance loans, the bank has a market share of .03 percent (by number) and is ranked 152nd of 553 lenders reporting such loans in the county. For both home mortgage products the top 10 lenders represent the majority of market share. For home mortgage loans, the top 10 lenders represent 53 percent of all loans reported and for refinance loans they represent 51 percent of loans reported.

Lending activity for small loans to businesses is excellent. The bank's market share and rank of small loans to businesses exceeds its deposit market share and rank for a comparable period.

Based on 2007 aggregate data (the most recent that is available) the bank's market share of small loans to businesses is .34 percent (based on dollar volume) and the bank is ranked 34th of 163 lenders reporting small loans to businesses in the county. Market share and rank are

based on the dollar volume of loans rather than number of loans because of the inclusion of credit card lenders in the reporting. Credit card lenders originate a large number of loans, but the dollar volume is significantly smaller. For example, the top six reporters of small loans to businesses are all credit card lenders that combined have a market share of 85 percent based on number of loans but only 37 percent based on dollar volume. Therefore, a comparison based on dollar volume of loans is more meaningful.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of loans is excellent. The geographic distribution of loans is excellent based on a full-scope review of performance in the MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area. Overall geographic distribution is excellent in Broward, Miami-Dade, and Palm Beach Counties.

Home Mortgage Loans

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

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

Overall, the geographic distribution of home mortgage loans is excellent. The geographic distribution of home mortgage loans in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is excellent. The geographic distribution of home mortgage loans in Broward, Miami-Dade, and Palm Beach Counties County is excellent.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Overall, the geographic distribution of home mortgage loans in Broward County is excellent. The distribution of both home purchase and refinance loans is excellent.

The percentage of home purchase loans in low-income geographies significantly exceeds the percentage of owner-occupied housing units in those geographies. This is particularly significant since there are only approximately 5,000 owner-occupied housing units in the low-income geographies of Broward and approximately 500 lenders reporting home mortgage loans. In moderate-income geographies the percentage of home purchase loans exceeds the percentage of owner-occupied housing units in those geographies. For refinance loans, the percentage of loans in low-income geographies exceeds the percentage of owner-occupied housing units in those geographies and in moderate-income geographies the percentage of refinance loans significantly exceeds the percentage of owner-occupied housing units.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

Overall, the geographic distribution of home mortgage loans in Miami-Dade County is excellent. The geographic distribution of both home purchase and refinance loans is excellent.

In both low- and moderate-income geographies, the percentage of home purchase loans exceeds the percentage of owner-occupied housing units in those geographies. For refinance loans, the percentage of loans in low-income geographies exceeds the percentage of owner-occupied housing units in those geographies and in moderate-income geographies the percentage of refinance loans significantly exceeds the percentage of owner-occupied housing units.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Overall, the geographic distribution of home mortgage loans in Palm Beach County is excellent however this conclusion is based on a small number of loans. The geographic distribution of both home purchase loans and refinance loans is excellent however this conclusion is based on a small number of loans.

The bank did not have any home purchase loan activity in the low-income geographies of Palm Beach County. However, it should be noted that there are limited opportunities for such lending by the bank considering that there are only 5,416 owner-occupied housing units in the low-income geographies of Palm Beach County and 527 lenders reporting home mortgage loans in the county. In moderate-income geographies the percentage of home purchase loans significantly exceeds the percentage of owner-occupied housing units in those geographies. For refinance loans, in both low- and moderate-income geographies, the bank's percentage of lending exceeds the percentage of owner-occupied housing units.

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 overall geographic distribution of small loans to businesses is excellent. Geographic distribution of small loans to businesses in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is excellent. The geographic distribution of small loans to businesses is excellent in Miami-Dade County and good in Broward and Palm Beach Counties.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL/Broward County)

The geographic distribution of the bank's small loans to businesses is good. The percentage of small loans to businesses in low-income geographies exceeds the percentage of businesses in those geographies. The percentage of small loans to businesses in moderate-income geographies is somewhat lower than the percentage of businesses in those geographies.

MD 33124 (Miami-Miami Beach-Kendall, FL/Miami-Dade County)

The geographic distribution of the bank's small loans to businesses is excellent. The percentage of small loans to businesses in low-income geographies exceeds the percentage of businesses in those geographies. The percentage of small loans to businesses in moderate-income geographies is near to the percentage of businesses in those geographies.

MD 48424 (West Palm Beach-Boca Raton, FL/Palm Beach County)

The geographic distribution of the bank's small loans to businesses is good however this conclusion is based on a small number of loans. The bank had no small loans to businesses in low-income geographies however opportunities are limited to approximately 6,000 businesses. The percentage of small loans to businesses in moderate-income geographies exceeds the percentage of businesses in those geographies.

Lending Gap Analysis

CNBF's reports detailing lending activity over the evaluation period for home mortgage and small loans to businesses were reviewed to identify gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

A substantial majority of home mortgage and small loans to businesses originated/purchased by CNBF during the evaluation period are within the bank's overall assessment area. Overall, 98 percent of loans by number and 93 percent by dollar amount are inside the bank's overall assessment area. This performance was positively factored into the overall analysis of the distribution of loans by income level of the geography.

By product, 94 percent of home purchase loans by number and 81 percent by dollar are inside the overall assessment area and 98 percent of refinance loans by number and 89 percent by dollar amount are inside the overall assessment area. For small loans to businesses, 99 percent of loans by both number and dollar amount are inside the bank's overall assessment area.

Distribution of Loans by Income Level of the Borrower

Overall, the bank's distribution of loans by income level of the borrower is adequate, given performance context. The bank's distribution of loans by the income level of the borrower in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is adequate, given performance context. Borrower distribution is adequate in Broward, Miami-Dade, and Palm Beach Counties, given performance context.

Home Mortgage Loans

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

Overall, the distribution of home mortgage loans by the income level of the borrower in the MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is good, given performance context. The distribution of home mortgage loans by income level of the borrower is good in Broward, Miami-Dade, and Palm Beach Counties, given performance context.

During the evaluation period, performance context issues made it difficult to provide home mortgage loans to low-income borrowers in the overall MSA assessment area. For this reason, more weight was given to lending to moderate-income borrowers in reaching our conclusions.

Starting in 2003, housing prices began to surge throughout all portions of the MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area. The median price of existing single-family homes increased 25 to 30 percent between 2003 and 2006. Income levels did not keep pace and low-income families were almost virtually shut out of the housing market unless sufficient subsidies were available. As home prices decline during the current housing and economic crisis however homes are more affordable although the availability of subsidies is greatly reduced. In addition, the assessment area's high poverty rates further limit the ability of many low-income families to become homeowners, even with the assistance of subsidy programs and special mortgage products. High property taxes and homeowner's insurance costs also contribute to the inability of low-income borrowers to become home owners.

Also, it should be noted that the demand for refinance loans by low-income families is generally very limited. Many times low-income families have taken advantage of various subsidy programs and special mortgage products that have very low interest rates that would not make it necessary for them to refinance for a lower interest rate. Also, some special programs do not allow for refinancing.

For further discussion on performance context issues, please see the Market Profiles in Appendix B.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Overall, the distribution of home mortgage loans by the income level of the borrower in Broward County is good, given performance context. The distribution of home purchase loans is excellent and the distribution of refinance loans is good, given performance context.

The percentage of home purchase loans to low-income borrowers is somewhat lower than the percentage of low-income families in the county, but consistent with performance context issues noted above. The percentage of home purchase loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the county. For refinance loans, the percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the county, but not inconsistent with context issues noted above. Refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the county.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

Given performance context, the distribution of home mortgage loans by income level of the borrower in Miami-Dade County is good. The distribution of both home purchase and refinance loans is good, given performance context.

The percentage of home purchase loans to low-income borrowers is significantly lower than percentage of low-income families in the county, but consistent with performance context. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of

moderate-income families in the county. For refinance loans, the percentage of loans to low-income borrowers is lower than the percentage of low-income families in the county, but this performance is consistent with performance context. Refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the county.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Given performance context, the overall distribution of home mortgage loans by income level of the borrower in Palm Beach County is good however this conclusion is based on a small number of loans. The distribution of home purchase loans is good and the distribution of refinance loans is excellent.

The bank did not originate or purchase any home purchase loans to low-income borrowers in Palm Beach County during the evaluation period. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the county. For refinance loans, the percentage of loans to low-income borrowers is somewhat lower than the percentage of low-income families in the county and refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the county.

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.

Overall, the borrower distribution of small loans to businesses is adequate. The borrower distribution of small loans to businesses in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is adequate. The distribution is good in Broward and adequate in Miami-Dade and Palm Beach Counties.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

The distribution of small loans to businesses in Broward County is good. The bank's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) is near to the percentage of small businesses located in Broward County. Also, 60 percent of the bank's small loans to businesses are for amounts of \$250 thousand or less, indicating that the bank is meeting the needs of smaller businesses.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

The distribution of small loans to businesses in Miami-Dade County is adequate. The bank's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) is somewhat lower than the percentage of small businesses located in Miami-Dade County. Also, 55 percent of the bank's small loans to businesses are for amounts of \$250 thousand or less, indicating that the bank is meeting the needs of smaller businesses.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

The distribution of small loans to businesses in Palm Beach County is adequate. The bank's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) is somewhat lower than the percentage of small businesses located in Palm Beach County. By loan amount, 58 percent of the bank's small loans to businesses are for amounts of \$250 thousand or less, indicating that the bank is meeting the needs of smaller businesses.

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. This table includes all community development loans, including multifamily loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

Overall, the bank's community development lending activity in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is excellent and it had a positive impact on the overall Lending Test rating. Performance is excellent in Broward and Miami-Dade Counties and it had a positive impact on overall Lending Test conclusions for those counties. Performance in Palm Beach County had a neutral impact on Lending Test conclusions for the County.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Considering the bank's limited presence in Broward County, CNBF has an excellent level of community development loans in the county. This performance had a positive impact on the overall Lending Test conclusion for Broward County.

During the community development evaluation period, the bank made seven community development loans in Broward County totaling \$3 million dollars. All of the funds were responsive to county needs for housing affordable to low- and moderate-income persons and families. The primary facility helped to make 115 affordable rental units available in Deerfield Beach and the other large facility helped to provide 11 "in-fill" units of owner-occupied housing in Fort Lauderdale.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

CNBF has an excellent level of community development loans in Miami-Dade County. This performance had a positive impact on the overall Lending Test conclusion for Miami-Dade County.

During the community development evaluation period, the bank made eight community development loans totaling \$62 million dollars. Of the total, 46 percent of loan funds (\$28.8 million) were used to assist with affordable housing needs. According to community contacts, the most pressing need in Miami-Dade County is affordable housing, particularly rental housing, affordable to low- and moderate-income residents. Notable are two loans totaling

\$21 million that will provide for the construction of two apartment complexes with a total of 242 rental units affordable to low-and moderate-income tenants. The complexes are being financed in part by Low Income Housing Tax Credits. Another loan, totaling \$1.8 million is to fund renovations of a 56-unit apartment complex that houses low- and moderate-income tenants receiving assistance under Section 8.

Approximately 43 percent of community development loan funds (\$26.7 million) are helping to revitalize and stabilize a moderate-income geography in Opa-Locka that has been designated a "Targeted Urban Area" by the City of Miami due to high unemployment and the lack of employment opportunities. The funds are being used to expand facilities at the Opa-Locka Airport and bring additional businesses and jobs to the area.

The remaining 11 percent of community development loan funds (\$6.7 million) help to meet economic development needs in Miami-Dade County. The funds allowed a business meeting the regulatory definition of "small business" to purchase and rehabilitate a shopping center that originally had one remaining tenant. After renovations, the shopping center attracted 10 new businesses and a minimum of 50 new jobs.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

CNBF has no community development loans in Palm Beach County during the evaluation period. This performance had a neutral impact on the overall Lending Test conclusion for Palm Beach County.

Product Innovation and Flexibility

The bank makes good use of flexible mortgage programs to help meet credit needs in its assessment area. CNBF's use of these flexible programs had a positive impact on conclusions under the Lending Test.

Throughout all portions of the MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area, CNBF offers its City Smart Community Mortgage Program. A proprietary product initiated by the bank, the mortgage features flexible underwriting criteria, 95 percent loan-to-value ratios, no private mortgage insurance requirements, and reduced closing costs. During the evaluation period, the bank originated 115 City Smart mortgages in the full-scope MSA 33100 assessment area.

City Smart Mortgages allow for multiple layers of financing enabling borrowers to participate in programs designed to assist low- and moderate-income individuals and families to become homeowners. Local community development corporations (CDCs) and cities often have home purchase assistance programs that can benefit City Smart borrowers and in some cases, HUD Section 8 housing assistance payments can be used for mortgage payments. Of the 115 City Smart mortgages 74, or 64 percent, included at least one special assistance program.

Originated City Smart loans are included with the bank's home mortgage loans analyzed under other portions of the Lending Test.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated "outstanding". Based on a full-scope review, the bank's performance in the MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) is excellent. Performance is excellent in Broward, Miami-Dade, and Palm Beach Counties.

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

The majority of the bank's investments are mortgage-backed securities, for which the collateral is a pool of mortgage loans to low- and moderate-income borrowers. Many of these securities are backed by mortgages on properties located in more than one of the MDs within the bank's MSA assessment area. These investments are presented in Table 14 under "MSA 33110" investments because they benefit multiple MDs under analysis. The impact of these MSA investments is taken into consideration when reaching conclusions about performance in each of the MDs. Also, the bank has a prior period investment in the Florida Housing Tax Credit Fund, Ltd, which serves all of the state of Florida, with the potential to serve the bank's assessment area. This investment is shown under the caption "Statewide".

Overall, the bank's community development investments are responsive to assessment area needs, primarily addressing the need for affordable housing. Affordable housing needs are considered critical throughout the overall MSA assessment area. Investments are not considered innovative or complex and private investors routinely provide these types of qualified investments. For a discussion of investment opportunities, see the Market Profile in Appendix B.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Investment performance in Broward County is excellent when considering the impact of MSA investments.

During the current evaluation period, the bank had 19 qualified investments totaling \$34,000 in Broward County. All are donations to organizations whose primary mission meets one of the definitions of community development. Also, Broward County benefited from approximately 48 percent of the MSA mortgage-backed securities (MBSs) discussed above. MBSs 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.

Broward County also had seven prior period investments totaling \$819,000, which continue to benefit the county. Prior period investments, all of which are MBSs, are investments originated during previous examination evaluation periods and remain on the books of the bank. In addition to these direct prior period investments, Broward County benefited from approximately 39 percent of the prior period MSA investments noted in Table 14. The mortgages that back these securities continue to provide housing for low- and moderate-income residents.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

Investment performance in Miami-Dade County is excellent when considering the impact of MSA investments.

During the current evaluation period, the bank had 84 qualified investments totaling \$8.8 million in Miami-Dade County. Of those investments, 74 investments totaling \$193,000 are donations to organizations whose primary mission meets one of the definitions of community development.

The majority (83 percent) of current period investment dollars are concentrated in five MBSs totaling \$7.3 million. Four securities are backed by a total of 62 mortgages to low- and moderate-income borrowers residing in Miami-Dade County. The fifth MBS is backed by a mortgage on a 321 unit apartment complex located in Opa-Locka that was partially financed using Low Income Housing Tax Credits. In addition, the bank made six deposits in minority-owned financial institutions operating in Miami-Dade County and invested in a small business loan fund providing micro loans to businesses located in low- or moderate-income geographies of Miami-Dade County. Finally, Miami-Dade County benefited from approximately 35 percent of the current period MSA MBS investments discussed above.

Prior period investments include the balance of five MBSs totaling \$1.6 million. In addition, Miami-Dade County benefited from approximately 49 per cent of the prior period MSA investments noted in Table 14. Prior period investments are investments originated during previous examination evaluation periods that remain on the books of the bank and continue to benefit the county. The mortgages that back these securities continue to provide housing for low- and moderate-income residents.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Investment performance in Palm Beach County is excellent when considering the impact of MSA investments.

At the current examination the bank has 10 qualified investments totaling \$19,000 which are donations to organizations in Palm Beach County whose primary mission meets one of the definitions of community development. In addition, the county benefited from approximately 17 percent of current period MSA investments and 12 percent of prior period MSA investments. Prior period investments are investments originated during previous examination evaluation periods that remain on the books of the bank and continue to benefit the county. The mortgages that back these securities continue to provide housing for low- and moderate-income residents.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "outstanding". Based on a full-scope review, the bank's performance in the overall MSA 3100 (Miami-Ft. Lauderdale-Palm Beach,

FL) assessment area is excellent. Performance is excellent in Miami-Dade County and good in Broward and Palm Beach Counties.

Retail Banking Services

The bank's retail service delivery systems are excellent and readily accessible to geographies and individuals of different income levels. 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.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Branches in Broward County are reasonably accessible to geographies and individuals of different income levels. Of the two branches, one is located in a low-income geography and one in a middle-income geography. The percentage of the bank's presence in low-income geographies significantly exceeds the percentage of population residing in low-income geographies. The bank has no branches in moderate-income geographies, while 26 percent of the population resides in moderate-income geographies.

Also, it should be noted that the Hallandale Branch, located in a middle-income geography, has a walk-up window that once each week is dedicated for use by employees of a large local business headquartered nearby. Based on employee account information, a significant majority of employees that use the facility reside in low- or moderate-income geographies.

No branches were opened in Broward County during the evaluation period. One branch, located in an upper-income geography, was closed having a neutral impact on overall retail banking services.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

Branches in Miami-Dade County are readily accessible to geographies and individuals of different income levels. Of the 13 branches, the percentage of branches in low-income geographies significantly exceeds the percentage of population residing in such geographies. The percent of branches in moderate-income geographies substantially meets the percentage of population residing in moderate-income geographies. In addition, two branches (Coral Gables and North Miami), located in middle-income geographies, are immediately adjacent to moderate-income geographies. These branches are located in central business areas that commonly serve the neighboring moderate-income geographies.

Branches were neither opened nor closed in Miami-Dade County during the evaluation period, having a neutral impact on overall retail banking services.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Branches in Palm Beach County are reasonably accessible to geographies and individuals of different income levels. Of the three branches, none are located in a low-income geography and one is located in a moderate-income geography. The percentage of the bank's branches in moderate-income geographies exceeds the percentage of population residing in moderate-

income geographies. While the bank has no branches in low-income geographies, only four percent of the population resides in low-income geographies.

Branches were neither opened nor closed in Palm Beach County during the evaluation period, having a neutral impact on overall retail banking services.

A wide range of banking products and services are offered throughout the overall MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area, as described in the bank's Public File. Products, services and business hours are reasonable and are comparable among branch locations, regardless of the income level of the geography. Of particular note are the following products:

- City Smart Mortgage Checking and Savings. These free, low-minimum balance accounts are offered in conjunction with the City Smart Mortgage product, which is directed to low- and moderate-income homebuyers. A matching deposit of \$50 is made to a new City Smart Savings account. During the overall evaluation period, 13 accounts were opened.
- City Smart Small Business Checking Account, an account free of service charges for those businesses writing 50 checks or less per month. During the evaluation period, 767 accounts were opened.

Branch locations are augmented by a variety of alternative delivery systems including ATMs, telephone banking, and online banking with bill pay. ATM facilities provide enhanced availability of banking services to low- and moderate-income persons and geographies. All branch offices located in low- and moderate-income geographies provide ATMs. In addition, the bank operates four off-site ATMs, one of which is located in a low-income geography. There is no data as to the impact of telephone and online banking on low- and moderate-income persons therefore no significant weight was given to these systems.

Community Development Services

The bank's provision of community development services in the overall full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is good. CNBF provides a relatively high level of community development services throughout the full-scope assessment area that are responsive to assessment area needs, particularly those related to financial literacy training and affordable housing. The provision of community development services is good in Miami-Dade County and adequate in Broward and Palm Beach Counties.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Considering the bank's limited presence, CNBF provides an adequate level of community development services in Broward County. During the evaluation period two different bank representatives provided technical assistance on financial matters to two different organizations whose mission meets the definition of community development. One organization was assisted in its fund raising efforts while the other was assisted in the development of its financial education programs. Also, community development lenders

provided individual counseling to persons seeking affordable housing opportunities from two different organizations offering affordable housing assistance programs.

In addition, bank representatives made presentations at 31 first time home buyer seminars during the evaluation period attended by approximately 270 people. The programs, presented in both English and Spanish, include discussions on budgeting, savings, the loan process, credit, etc. All the seminars were presented in association with local community based organizations whose primary mission is to assist with housing opportunities affordable to low- and moderate-income individuals and families.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

CNBF provided a good level of community development services in Miami-Dade County. During the evaluation period, three different bank representatives provided technical assistance on financial matters to five different organizations whose mission meets the definition of community development. They served on such committees as finance, curriculum development, fund raising, and an anti-predatory lending task force.

In addition, bank representatives made presentations at 22 first time home buyer seminars during the evaluation period attended by approximately 320 people. The programs, presented in both English and Spanish, include discussions on budgeting, savings, the loan process, credit, etc. All the seminars were presented in association with local community based organizations whose primary mission is to assist with housing opportunities affordable to low- and moderate-income individuals and families. Also, community development lenders provided individual counseling to persons seeking affordable housing opportunities from nine different local community development corporations or cities where audiences would have been too small for larger scale presentations. Bank representatives also made presentations at six other programs on topics such as credit, predatory lending, and general financial topics. A community contact for this examination noted the need for all types of financial education programs.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Considering the bank's limited presence, CNBF provides an adequate level of community development services in Palm Beach County. During the evaluation period a bank representative provided technical assistance on financial matters for a local organization that facilitates the development of affordable rental housing and community development lenders provided individual counseling to persons seeking affordable housing opportunities from a local community development corporation.

In addition, bank representatives made presentations at five first time home buyer seminars during the evaluation period. The programs, presented in both English and Spanish, included discussions on budgeting, savings, the loan process, credit, etc. All the seminars were presented in association with local community based organizations whose primary mission is to assist with housing opportunities affordable to low- and moderate-income individuals and families.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/06 to 12/31/08) Investment and Service Tests and CD Loans: (04/06/06 to 05/18/09)	
Financial Institution	Products Reviewed	
CNBF Miami, FL	Home Mortgage Loans Small Loans to Businesses Community Development Loans	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) MSA 36740 (partial only Seminole and Orange Counties) MSA 38940 (St. Lucie and Martin Counties)	Full Scope None None	 New assessment areas/insufficient activity

Appendix B: Market Profiles for Full-Scope Areas

[MIAMI-FT. LAUDERDALE-PALM BEACH ASSESSMENT AREA (MSA 33100)]

The full-scope assessment area consists of all of the Miami-Ft. Lauderdale-Palm Beach MSA, which includes all of the contiguous counties of Miami-Dade, Broward, and Palm Beach. The assessment area meets the requirements of the CRA regulation and does not arbitrarily exclude low- and moderate-income geographies.

Overall, the MSA has a total population of approximately 5 million people, with the largest concentration of population in the Miami portion of the MSA. The Census Bureau has designated each of the three counties in the full-scope assessment area as a Metropolitan Division (“MD”). The accompanying tables and discussions focus on each of the MDs individually.

MD 33124 (Miami-Miami Beach-Kendall, FL)

Demographic Information for Full Scope Area: MD 33124 (Miami- Dade County, FL)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	347	7.78	28.53	32.85	29.97	0.86
Population by Geography	2,253,362	4.89	28.61	35.68	30.79	0.02
Owner-Occupied Housing by Geography	449,333	1.69	19.82	36.99	41.51	0.00
Business by Geography	304,953	4.91	22.10	32.30	40.27	0.42
Farms by Geography	3,499	2.60	19.03	34.01	44.21	0.14
Family Distribution by Income Level	552,484	23.00	16.98	18.53	41.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	220,856	8.31	40.20	35.41	16.08	0.00
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below Poverty Level		40,266 49,200 18%	Median Housing Value Unemployment Rate (December 2008)		123,974 7.00%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2008 HUD updated MFI

MD 33124 is equivalent to Miami-Dade County. Based on the 2000 Census, Miami-Dade County consists of 347 census tracts (geographies) of which 27 (8%) are low-income, 99 (29%) are moderate-income, 114 (33%) are middle-income, and 104 (30%) are upper-income. The greatest concentration of low- and moderate-income geographies can be found in the city of Miami.

Miami-Dade County is a densely populated urban center. According to the 2000 Census, the total population is 2.25 million however 2006 estimates by the US Census Bureau place the total population at 2.4 million. Overall, owner occupancy is high in the assessment area

reaching 60 percent (based on 2006 estimates) as a result of the housing boom that impacted the area through 2006. However, in low- and moderate-income geographies, the level of renter occupancy is high (69% and 56%, respectively). These geographies also represent high levels of households below the poverty level (47% and 27%, respectively), indicating a need for affordable rental housing. These households would have difficulty qualifying for a home loan even at current housing prices. Community contact indicates that the need for affordable rental housing is acute in Miami-Dade County as the number of homeless grows.

Miami-Dade County, particularly the city of Miami, has been severely impacted by the housing crisis. The state of Florida consistently ranks among the top five states in the nation for the number of home foreclosures and, according to Moody's Economy.com, the city of Miami has the highest rate of first mortgage write-offs in the country, at 12.55 per cent. The national average is 1.95 percent. If delinquencies are included, the rate escalates to 26.15 per cent. These high foreclosure rates put additional stress on the affordable rental market and the stability of communities.

Housing prices in Miami-Dade County are declining. The National Association of Realtors estimates the median sales price of an existing single-family home at year-end 2008 in Miami-Dade County to be \$285,000, almost the same level it was in 2003. For the same period, the median price of a condominium was \$161,000. When these prices are compared with the county's HUD Adjusted Median Family Income of \$49,200 for 2008 it is clear that, with the assistance of subsidizes and other special programs, low-or moderate-income families may have an opportunity to purchase a home. However, current economic conditions have reduced the availability of assistance.

Local economic conditions are weak. Prior to the National Bureau of Economic Research declaring the United States officially in a recession, local economists indicated the economy of Florida was in recession earlier, due to the large decline in the real estate values (over 30 percent). In Miami-Dade County, housing starts have declined to the lowest level in a decade according to the Metro Study Corporation. In the fourth quarter of 2008 only 72 housing starts were recorded in Miami-Dade County. The decline in jobs, particularly construction and construction-related jobs, has driven the county's unemployment rate to 7 percent at year-end 2008 compared with 7.2 percent nationally. This indicates a need for activities that support job creation, job placement and job training programs, and community services for low- and moderate-income persons and families.

The housing and economic crisis has combined to reduce mortgage lending in the assessment area, however 2008 saw a decline in the inventory of new homes indicating that mortgage lending may have increased somewhat. Home Mortgage Disclosure Act (HMDA) data shows that between 2006 and 2007 (the most recent year for which data is available), conventional home purchase loans in Miami-Dade County declined 53 percent from approximately 126,000 conventional home purchase loan originations or purchases in 2006 to approximately 59,000 in 2007. Refinance loans declined at a lesser rate of approximately 25 percent (data for 2008 is not yet available). However, the number of mortgage lenders reporting conventional home purchase loan originations or purchases in 2007 remains high at 476. Conversely, small business lending increased, but not at a significant rate. Based on CRA loan data, the number of small loans to businesses reported in Miami-Dade County increased about 6 percent between 2006 and 2007.

Banking competition within the assessment area continues to be intense. In addition to community and mid-size banks, branches of the largest banks in the country operate in Miami-Dade County. As of June 30, 2008 there were 77 deposit taking financial institutions in Miami-Dade County operating 650 branches. In addition to competition for deposits and loans, the level of competition in the assessment area is very high for qualified community development investments and loans.

Opportunities for community development lending, investments, and services in Miami-Dade County have become somewhat limited. Some opportunities exist to finance the purchase and/or rehabilitation of multi-family housing units that provide affordable rental housing in low- and moderate-income geographies, but they have declined from previous levels because of the volume of condominium conversions during the height of the housing boom. Statewide affordable housing entities are continuing to construct affordable rental housing as are some local developers. There is a federally designated Empowerment Zone that targets economic development with the goal of revitalizing the area by stimulating and retaining jobs and there are areas designated as Targeted Urban Areas ("TUA") that are the focus for the Urban Economic Revitalization Plan for Miami-Dade County in which loans can be made.

The impact of the mortgage crisis has caused community development organizations to change their focus from new construction to acquiring foreclosed properties, rehabilitating them, and then making them available for rent or for sale to low- and moderate-income persons or families. These activities will be funded through grants from the Neighborhood Stabilization Program (NSP) offered by the Department of Housing and Urban Development (HUD). Miami-Dade County will receive \$62 million to assist in this effort, as well as to demolish or rehabilitate abandoned properties and/or offer down payment and closing cost assistance to low- and moderate-income home buyers. Also, four cities within the county will receive an additional \$27 million under the NSP, including \$12 million for the city of Miami. These activities may provide new community development opportunities for banks in the near future.

Community development investment options are also limited. Mortgage-backed securities are an option but they have become less desirable in light of the mortgage crisis. Low Income Housing Tax Credits remain available but they are generally complex for community banks. Miami-Dade County, the state and the region do have community development financial institutions ("CDFIs") and private equity organizations which need support for their community development activities. Opportunities exist to contribute to qualified non-profit organizations whose missions are focused on providing affordable housing and community services for low- and moderate-income persons, particularly in the areas of job training and job placement, as noted by a community contact made for another CRA examination in the same assessment area. However, the extent of these activities has been impacted by the financial condition of some area banks.

Opportunities exist to provide financial literacy training in schools and in cooperation with local community organizations. This training could include homeownership, credit, foreclosure counseling, and information on general banking services for the un-banked population.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)

Demographic Information for Full Scope Area: MD 22744 (Broward County, FL)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	279	4.66	25.45	41.94	27.96	0.00
Population by Geography	1,623,018	3.57	26.43	43.13	26.88	0.00
Owner-Occupied Housing by Geography	454,625	1.16	23.67	45.93	29.24	0.00
Business by Geography	219,069	4.77	22.51	42.71	30.00	0.00
Farms by Geography	3,145	3.97	23.40	41.72	30.91	0.00
Family Distribution by Income Level	413,958	20.85	18.17	20.48	40.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	161,511	5.81	38.36	42.71	13.12	0.00
Median Family Income HUD Adjusted Median Family Income for 2008 Households Below Poverty Level		50,570 64,000 11%	Median Housing Value Unemployment Rate (December 2008)		115,192 6.8%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2008 HUD updated MFI

Broward County is equivalent to Metropolitan Division 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL). Based on the 2000 Census, the assessment area consists of 279 census tracts (geographies) of which 13 (5%) are low-income, 71 (25%) are moderate-income, 117 (42%) are middle-income, and 78 (28%) are upper-income. In 2008, the HUD Adjusted Median Family Income for Broward County was \$64,000.

According to the 2000 Census the total population of Broward County is 1.6 million. Owner occupancy is high in the county reaching 61 percent based on the 2000 Census, however, in low-income geographies owner occupancy is only 25 percent, indicating a need for affordable rental housing.

The housing crisis is just as evident in Broward County as it is in Miami-Dade County. Realty Trac consistently lists Broward County among the top five counties in the United States as having the highest level of home foreclosures. According to Moody's Economy.com, Fort Lauderdale, the largest city in Broward County, is ranked as the city with the third highest rate of first mortgage write-offs in the country, at 8.86 percent. When combined with delinquencies, the rate is 21.46%. This data indicates a significant need for affordable rental housing and the potential for destabilized neighborhoods. According to a community contact made for another examination in the same assessment area, foreclosure recovery programs are a critical need in the assessment area.

Housing prices in Broward County have declined since the beginning of 2006 as the housing boom came to an end. The National Association of Realtors estimated the median sales price of an existing single-family home in Broward County to be \$229,100 at the end of 2008, representing a decline of 34 percent from 2007. With subsidies and other forms of assistance, some low- and moderate-income families can afford to purchase a home in the county, but economic conditions are causing the availability of these assistance programs to decline significantly.

Economic weakness has not escaped Broward County as the decline in real estate, construction and construction-related jobs, a mainstay of the local economy, have driven the unemployment rate to 6.8 percent at year-end 2008. Health services continue to provide job opportunities but even jobs in tourism have been negatively impacted.

As in Miami-Dade County, the volume of residential mortgage lending declined between 2006 and 2007. According to Metro Study Corporation, new housing starts in Broward County for the last quarter of 2008 numbered only 13. The volume of conventional home purchase loans as reported under the HMDA declined by 51 percent for the period from 83,398 originations or purchases in 2006 to 41,253 in 2007 (the most recent year for which data is available). Refinance loans also declined from 81,019 to 55,107. Small business loan originations reported under the CRA increased from 128,690 in 2006 to 136,171 in 2007.

Banking competition within the assessment area is high. In addition to community and mid-size banks, branches of the largest banks in the country operate in Broward County. As of June 30, 2008, there were 67 deposit taking financial institutions in Broward County operating 474 branches.

The same types of opportunities are available for community development lending, investments, and services in Broward County, as in Miami-Dade, but they are even more limited. The same factors impact community development activity in both counties. In Broward County grants from HUD's Neighborhood Stabilization Program (NSP) will total \$36.8 million of which \$17.8 million will go to Broward County and the remainder to eight individual cities. Non-profits as well as the county are currently working on implementing plans to use these funds and they could provide new opportunities for banks. As noted in Miami-Dade County, opportunities exist for investments in local, state-wide, and regional CDFIs and for services directed to financial education programs.

MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)

Demographic Information for Full Scope Area: MD 48424 (Palm Beach County, FL)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	265	5.66	26.42	33.58	33.58	0.75
Population by Geography	1,131,184	4.21	29.32	33.88	32.37	0.21
Owner-Occupied Housing by Geography	354,024	1.53	24.63	36.35	37.50	0.00
Business by Geography	167,235	3.43	21.26	34.69	40.46	0.16
Farms by Geography	3,728	4.27	23.04	35.70	36.96	0.03
Family Distribution by Income Level	306,002	19.86	18.56	20.60	40.98	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	117,575	7.08	40.85	33.45	18.62	0.00
Median Family Income HUD Adjusted Median Family Income for 2007 Households Below Poverty Level		53,777 61,200 9%	Median Housing Value Unemployment Rate (2000 US Census)		131,523 2.24%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2007 HUD updated MFI

Palm Beach County is equivalent to Metropolitan Division 48424 (West Palm Beach, Boca Raton-Boynton Beach, FL).

Based on the 2000 Census, the county consists of 265 census tracts (geographies) of which 15 (6%) are low-income, 70 (26%) are moderate-income, 89 (33%) are middle-income, and 89 (33%) are upper-income. Clusters of low- and moderate-income geographies can be found in cities such as West Palm Beach, Riviera Beach, Lake Worth, and Boynton Beach along the eastern boundaries of the county, as well as inland around Lake Okeechobee in western cities such as Belle Glade and Pahokee.

The county has a population of approximately 1.1 million, based on the 2000 Census. The 2008 HUD estimated median family income for Palm Beach County is \$66,000, one of the highest in Florida. But, in communities such as Riviera Beach, Belle Glade, and Pahokee, the level of population at or below the poverty level is approximately 32 percent. For the AA overall, nine percent of the population lives below the poverty level. These levels of poverty reduce the opportunities for mortgage lending.

While housing prices, as well as taxes and insurance, in the county increased significantly in the past several years, they are declining just as in the other counties in the overall MSA assessment area. Through November 2008 the median home price for an existing single-family home in Palm Beach County was \$247,400, a decline of 28 percent from the \$369,400 figure for 2007. With these lower prices, some low- and moderate-income families can afford to purchase homes under special programs that provide closing cost assistance and/or subsidies, but as in the other counties discussed the availability of funds for these programs is declining.

Palm Beach County has also been impacted by the housing crisis. Foreclosure activity is high and in the city of West Palm Beach. The rate of first mortgage write-offs, according to Moody's Economy.com, is 6.42% making it the 10th ranked city in the United States. When delinquencies are included, the rate is 15.62%.

The county's economy is largely based in the service and retail sectors. However, the western portion of the county has an agricultural base rooted in sugar cane. Most employment opportunities were focused on real estate construction and development and the decline in those sectors has caused the unemployment rate to rise to 7.8 percent at the end of 2008, exceeding the national rate of 7.2 percent and the highest rate of the three counties in the MSA assessment area.

As in the other portions of the overall MSA, home mortgage lending has declined. However data provided by Metro Study Corporation indicates that housing sales increased somewhat in the later part of 2008. HMDA data shows that conventional home purchase loan originations and purchases declined 49 percent between 2006 and 2007 (the most recent year for which data is available) while refinance originations or purchases declined 34 percent. Loans to businesses, as reported under the CRA, increased approximately 2 percent.

Banking competition within Palm Beach County is high. In addition to community and mid-size banks, branches of the largest banks in the country operate in Palm Beach County. As of June 30, 2008, there were 66 deposit taking financial institutions in the county operating 499 branches.

The same types of opportunities are available for community development lending, investments, and services in Palm Beach County as in Miami-Dade, but they are more limited. Palm Beach County will receive a grant totaling \$27.7 million under HUD's Neighborhood Stabilization Program (NSP) and another \$3 million is allocated to Boynton Beach so additional community development opportunities may become available. As noted in Miami-Dade County, opportunities exist for investments in local, state-wide, and regional CDFIs and for services directed to financial education programs.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (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.

BANK OF FLORIDA

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008						
MA/Assessment Area (2008):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
MD - 22744 (Broward County)	14.12	150	25,812	107	35,009	0	0	7	3,119	264	63,940	3.32
MD 33124 (Miami-Miami Beach and Kendall)	77.64	280	101,971	545	187,257	0	0	8	62,281	833	351,509	91.25
MD 48424 (Palm Beach County)	5.65	32	9,078	50	16,482	0	0	0	0	82	25,560	5.17
Limited Review:												
MSA 36740 Partial (Seminole and Orange Counties)	2.06	2	7,225	3	2,098	0	0	0	0	5	9,323	.26
MSA 38940 (St Lucie and Indian River Counties)	0.53	1	1,386	1	1,000	0	0	0	0	2	2,386	0.00

* Loan Data as of December 31, 2008. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from April 6, 2006 to May 18, 2009.

*** Deposit Data as of June 30, 2008. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

OF FLORIDA

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
MD - 22744 (Broward County)	71	27.95	1.16	28.17	23.67	36.62	45.93	25.35	29.24	9.86	0.03	0.00	0.10	0.02	0.02
MD- 33124 (Miami-Miami Beach-Kendall)	167	65.75	1.69	14.97	19.82	34.73	36.99	24.55	41.51	25.75	0.10	0.32	0.12	0.09	0.08
MD - 48424 Palm Beach County	15	5.91	1.53	0.00	24.63	46.67	36.35	13.33	37.50	40.00	0.04	0.00	0.07	0.02	0.04
Limited Review:															
MSA 36740 Partial (Seminole and Orange Counties)	1	0.39	0.86	0.00	14.02	0.00	43.19	0.00	41.93	100.00	0.00	0.00	0.00	0.00	0.00
MSA 38940 (St Lucie and Martin Counties)	0	0.00	1.15	0.00	11.40	0.00	62.21	0.00	25.24	0.00	0.00	0.00	0.00	0.00	0.00

* 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)

OF FLORIDA

Institution ID: CITY NATIONAL BANK

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT 2008			Geography: FLORIDA						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31,							
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	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid
Full Review:																
MD - 22744 (Broward County)	3	15.00	1.16	0.00	23.67	100.00	45.93	0.00	29.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MD - 33124 (Miami-Miami Beach-Kendall)	17	85.00	1.69	11.76	19.82	23.53	36.99	35.29	41.51	29.41	0.11	0.00	0.24	0.12	0.04	
MD - 48424 Palm Beach County	0	0.00	1.53	0.00	24.63	0.00	36.35	0.00	37.50	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
MSA 36740 Partial (Seminole and Orange Counties)	0	0.00	0.86	0.00	14.02	0.00	43.19	0.00	41.93	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 38940 (St Lucie and Martin Counties)	0	0.00	1.15	0.00	11.40	0.00	62.21	0.00	25.24	0.00	0.00	0.00	0.00	0.00	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)

OF FLORIDA

Institution ID: CITY NATIONAL BANK

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 31, 2008			Geography: FLORIDA								Evaluation Period: JANUARY 1, 2006 TO DECEMBER				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
MD - 22744 (Broward County)	75	41.44	1.16	4.00	23.67	68.00	45.93	16.00	29.24	12.00	0.07	0.18	0.21	0.02	0.02
MD - 33124 (Miami-Miami Beach-Kendall)	90	49.72	1.69	4.44	19.82	43.33	36.99	22.22	41.51	30.00	0.07	0.12	0.17	0.04	0.04
MD - 48424 Palm Beach County	16	8.84	1.53	12.50	24.63	43.75	36.35	31.25	37.50	12.50	0.03	0.12	0.06	0.02	0.02
Limited Review:															
MSA 36740 Partial (Seminole and Orange Counties)	0	0.00	0.86	0.00	14.02	0.00	43.19	0.00	41.93	0.00	0.00	0.00	0.00	0.00	0.00
MSA 38940 (St Lucie and Martin Counties)	0	0.00	1.15	0.00	11.40	0.00	62.21	0.00	25.24	0.00	0.00	0.00	0.00	0.00	0.00

* 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)

OF FLORIDA

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
MD - 22744 (Broward County)	1	10.00	2.27	0.00	32.48	100.00	48.64	0.00	16.61	0.00	0.00	0.00	0.00	0.00	0.00	
MD - 33124 (Miami-Miami Beach-Kendall)	6	60.00	6.85	0.00	35.49	66.67	30.24	16.67	27.42	16.67	0.00	0.00	0.00	0.00	0.00	
MD- 48424 Palm Beach County	1	10.00	3.13	0.00	32.78	0.00	31.51	0.00	32.58	100.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
MSA 36740 Partial (Seminole and Orange Counties)	1	10.00	2.73	0.00	27.37	0.00	50.42	0.00	19.47	100.00	0.00	0.00	0.00	0.00	0.00	
MSA 38940 (St Lucie and Martin Counties)	1	10.00	2.19	0.00	14.37	0.00	43.56	100.00	39.88	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.

OF FLORIDA

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: FLORIDA								Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008				
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
Full Review:															
MD - 22744 (Broward County)	107	15.22	4.82	9.35	22.76	12.15	42.53	61.68	29.90	16.82	0.03	0.12	0.02	0.05	0.01
MD - 33124 (Miami-Miami Beach-Kendall)	543	77.24	4.97	9.02	22.25	20.63	32.20	26.15	40.13	44.20	0.12	0.29	0.14	0.12	0.10
MD - 48424 Palm Beach County	49	6.97	3.42	0.00	21.29	28.57	34.64	12.24	40.49	59.18	0.02	0.00	0.03	0.00	0.02
Limited Review:															
MSA 36740 Partial (Seminole and Orange Counties)	3	0.43	1.89	0.00	19.17	33.33	40.92	66.67	38.03	0.00	0.00	0.00	0.01	0.00	0.00
MSA 38940 (St Lucie and Martin Counties)	1	0.14	2.67	0.00	20.82	0.00	54.94	100.00	21.58	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 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 (2008).

OF FLORIDA

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008							
MA/Assessment Area:	Total Home Purchase 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
Full Review:															
MD - 22744 (Broward County)	71	27.95	20.85	11.76	18.17	50.00	20.48	17.65	40.50	20.59	0.04	0.18	0.16	0.04	0.02
MD - 33124 (Miami-Miami Beach-Kendall)	167	65.75	23.00	4.11	16.98	17.12	18.53	28.08	41.50	50.68	0.11	1.92	0.78	0.30	0.07
MD - 48424 Palm Beach County	15	5.91	19.86	0.00	18.56	21.43	20.60	28.57	40.98	50.00	0.05	0.00	0.09	0.06	0.04
Limited Review:															
MSA 36740 Partial (Seminole and Orange Counties)	1	0.39	17.89	0.00	17.59	0.00	21.98	0.00	42.54	100.00	0.00	0.00	0.00	0.00	0.00
MSA 38940 (St Lucie and Martin Counties)	0	0.00	18.46	0.00	19.34	0.00	22.19	0.00	40.01	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 9.8% 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)

OF FLORIDA

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 31, 2008		Geography: FLORIDA								Evaluation Period: JANUARY 1, 2006 TO DECEMBER					
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
Full Review:															
MD - 22744 (Broward County)	3	15.00	20.85	0.00	18.17	0.00	20.48	100.00	40.50	0.00	0.00	0.00	0.00	0.00	0.00
MD - 33124 (Miami-Miami Beach-Kendall)	17	85.00	23.00	6.67	16.98	13.33	18.53	13.33	41.50	66.67	0.12	0.00	0.28	0.21	0.09
MD - 48424 Palm Beach County	0	0.00	19.86	0.00	18.56	0.00	20.60	0.00	40.98	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
MSA 36740 Partial (Seminole and Orange Counties)	0	0.00	17.89	0.00	17.59	0.00	21.98	0.00	42.54	0.00	0.00	0.00	0.00	0.00	0.00
MSA 38940 (St Lucie and Martin Counties)	0	0.00	18.46	0.00	19.34	0.00	22.19	0.00	40.01	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 20.0% 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)

OF FLORIDA

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE 31, 2008			Geography: FLORIDA						Evaluation Period: JANUARY 1, 2006 TO DECEMBER						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families*	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans**	Overall	Low	Mod	Mid	Upp
Full Review:															
MD - 22744 (Broward County)	75	41.44	20.85	4.69	18.17	18.75	20.48	25.00	40.50	51.56	0.08	0.07	0.09	0.11	0.07
MD - 33124 (Miami-Miami Beach-Kendall)	90	49.72	23.00	5.95	16.98	20.24	18.53	16.67	41.50	57.14	0.07	0.62	0.24	0.07	0.06
MD - 48424 Palm Beach County	16	8.84	19.86	13.33	18.56	26.67	20.60	33.33	40.98	26.67	0.04	0.08	0.05	0.06	0.02
Limited Review:															
MSA 36740 Partial (Seminole and Orange Counties)	0	0.00	17.89	0.00	17.59	0.00	21.98	0.00	42.54	0.00	0.00	0.00	0.00	0.00	0.00
MSA 38940 (St Lucie and Martin Counties)	0	0.00	18.46	0.00	19.34	0.00	22.19	0.00	40.01	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 9.9% 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)

OF FLORIDA

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Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: FLORIDA			Evaluation Period: JANUARY 1, 2006 TO DECEMBER 31, 2008		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
MD - 22744 (Broward County)	107	15.16	66.53	59.81	30.84	28.97	40.19	0.03	0.06	
MD - 33124 (Miami-Miami Beach-Kendall)	545	77.20	64.74	40.18	36.33	18.53	45.14	0.12	0.13	
MD - 48424 Palm Beach County	50	7.08	65.34	46.00	30.00	28.00	42.00	0.02	0.02	
Limited Review:										
MSA 36740 Partial (Seminole and Orange Counties)	3	0.42	63.79	66.67	0.00	0.00	100.00	0.00	0.00	
MSA 38940 (St Lucie and Martin Counties)	1	0.14	66.99	100.00	0.00	0.00	100.00	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.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2008).

**** 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 1.98% of small loans to businesses originated and purchased by the bank.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: FLORIDA				Evaluation Period: APRIL 6, 2006 TO MAY 18,2009			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Statewide	1	36	0	0	1	36	0.15	0	0
MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL)	11	7,807	3	5,350	14	13,157	53.31	0	0
MD - 22744 (Broward County)	7	819	19	34	26	853	3.46	0	0
MD - 33124 (Miami-Miami Beach-Kendall)	5	1,580	84	8,785	89	10,365	42.00	0	0
MD - 48424 Palm Beach County	0	0	10	19	10	19	0.08	0	0
Limited Review:									
MSA 36740 Partial (Seminole and Orange Counties)	0	0	2	248	2	248	1.00	0	0
MSA 38940 (St Lucie and Martin Counties)	0	0	1	1	1	1	0.00	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.

OF FLORIDA

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: FLORIDA				Evaluation Period: April 6, 2006 TO May 18, 2009					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
MD - 22744 (Broward County)	3.32	2	10.00	50.00	0.00	50.00	0.00	0	1	0	0	0	-1	3.57	26.43	43.13	26.88
MD - 33124 (Miami-Miami Beach-Kendall)	91.25	13	65.00	23.08	15.38	23.08	38.46	0	0	0	0	0	0	4.89	28.61	35.68	30.79
MD - 48424 Palm Beach County	5.17	3	15.00	0.00	33.33	0.00	66.66	0	0	0	0	0	0	4.21	29.32	33.88	32.37
Limited Review:																	
MSA 36740 Partial (Seminole and Orange Counties)	0.26	1	5.00	0.00	0.00	100.00	0.00	1	0	0	0	+1	0	2.12	20.02	43.24	34.62
MSA 38940 (St Lucie and Martin Counties)	0.00	1	5.00	0.00	0.00	0.00	100.00	1	0	0	0	0	+1	3.58	17.57	57.55	21.31