



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks  
Washington, DC 20219

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## **Public Disclosure**

**March 15, 2004**

# **Community Reinvestment Act Performance Evaluation**

**Riverside National Bank of Florida  
Charter Number: 17437**

**2211 Okeechobee Road  
Fort Pierce, FL 34950**

**Office of the Comptroller of the Currency**

**South Florida Field Office  
9800 Northwest 41st Street Suite 120  
Miami, FL 33178**

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

## Table of Contents

<b>OVERALL CRA RATING .....</b>	<b>1</b>
<b>DEFINITIONS AND COMMON ABBREVIATIONS.....</b>	<b>2</b>
<b>DESCRIPTION OF INSTITUTION.....</b>	<b>6</b>
<b>SCOPE OF THE EVALUATION .....</b>	<b>7</b>
<b>FAIR LENDING REVIEW .....</b>	<b>9</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS .....</b>	<b>10</b>
LENDING TEST .....	10
INVESTMENT TEST .....	17
SERVICE TEST .....	19
<b>APPENDIX A: SCOPE OF EXAMINATION .....</b>	<b>A-1</b>
<b>APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS.....</b>	<b>B-1</b>
<b>APPENDIX C: TABLES OF PERFORMANCE DATA.....</b>	<b>C-1</b>

## Overall CRA Rating

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

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

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

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

The major factors that support this rating include:

- Lending levels that reflect adequate responsiveness to meeting the credit needs of the bank’s assessment areas.
- Adequate geographic distribution of loans throughout the bank’s assessment areas.
- A substantial majority of loans originated in the bank’s assessment areas.
- Excellent distribution of loans by the income level of the borrower.
- Qualified investments that reflect an adequate responsiveness to the credit and community development needs in the assessment areas.
- Service delivery systems that are accessible to geographies and individuals of different income levels in the bank’s assessment areas.
- A poor level of community development services in the bank’s full-scope assessment areas.

## 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.

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**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 statistical 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.

**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 household 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 or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

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

**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 primary metropolitan statistical area (PMSA), metropolitan statistical area (MSA), or consolidated metropolitan area (CMSA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

## Description of Institution

Riverside National Bank of Florida (RNBF) is a community bank headquartered in Fort Pierce, Florida. It is a wholly owned subsidiary of Riverside Banking Company (RBC), a one-bank holding company also headquartered in Fort Pierce. As of December 31, 2003, RNBF reported total assets of \$2.237 billion and total deposits of \$1.502 billion. RNBF, established in 1982, is an intrastate bank operating 41 offices in six assessment areas along the eastern coast of Florida. The assessment areas include all of the Fort Pierce-Port Saint Lucie MSA, the Melbourne-Titusville-Palm Bay MSA, the Lakeland-Winter Haven MSA, and the West Palm Beach-Boca Raton MSA, as well as the Volusia County portion of the Daytona Beach MSA, and the non-MSA counties of Okeechobee, Indian River, and Highlands.

RNBF has eight subsidiaries. One subsidiary, Riverside Leasing Company offers commercial leases of equipment to businesses and municipalities. Another subsidiary, Riverside Finance Company sells insurance and annuities to bank customers. Four other subsidiaries are limited to real estate holdings. Two new subsidiaries, Hometown Real Estate Investment Trust (REIT) and Hometown Investment Corporation (HIC), were formed in 2002. HIC owns 100% of the common stock of the REIT and RNBF owns 100% of HIC. In addition, RNBF has a minor ownership interest in Prosperity Banking Company, St. Augustine, FL and Riverside Gulf Coast Banking Company, Cape Coral, FL. These two bank holding companies operate independent of RNBF in their respective locations. Dockside Finance Company, which is wholly owned by RBC, discontinued loan originations in 2001 but continues to process payments. The company formerly engaged in sub-prime auto lending. No activities of the bank's subsidiaries are being considered at this evaluation and the operation of the bank's subsidiaries does not have an impact on the bank's ability to meet its CRA obligations.

RNBF is a full service financial institution offering a variety of loan and deposit products. Its strategic focus is consumer lending, but the bank also offers a full range of business banking products. As of December 31, 2003, total loans equaled \$1.287 billion or 57% of total assets and 86% of total deposits. Primary loan categories consist of residential real estate loans (41%), commercial and commercial real estate loans (31%), and consumer loans (27%). Various other loan types comprise the remaining 1%. Tier 1 Capital was \$178 million, which represents 8% of total assets.

There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs of its assessment areas. RNBF's performance was rated "Satisfactory" at its last CRA evaluation dated December 18, 2000.

## **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 HMDA and small loans to businesses. Small loans to farms were not evaluated because the volume was small (2% of the number of loan originations/purchases over the Lending Test evaluation period) and analysis would not be meaningful.

The evaluation period for the Lending Test is January 1, 2000 to December 31, 2002. For community development loans, the Investment Test and the community development portion of the Service Test, the evaluation period is from December 19, 2000 to March 15, 2004. For the retail portion of the Service Test, the evaluation period is from December 19, 2000 to December 31, 2002. Our conclusions related to qualified investments were 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. As part of the CRA evaluation, RNBF's publicly filed data on home mortgage loans and small loans to businesses was tested for accuracy. Errors were noted for the 2000, 2001 and 2002 reported small loans to businesses. However, the data was corrected and re-tested prior to the start of this CRA evaluation.

Community development investments and services submitted by the bank were verified to ensure that they met the regulatory definition of community development. Some items submitted were excluded from this evaluation because they did not meet the definition or purpose of community development.

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

RNBF has designated six assessment areas: all of the Fort Pierce-Port Saint Lucie MSA 2710, the Melbourne-Titusville-Palm Bay MSA 4900, the Lakeland-Winter Haven MSA 3980, and the West Palm Beach-Boca Raton MSA 8960, as well as the Volusia County portion of MSA 2020 (Daytona Beach), and the contiguous non-MSA counties of Okeechobee, Indian River, and Highlands. The Fort Pierce-Port Saint Lucie and Melbourne-Titusville-Palm Bay MSAs were selected for full-scope reviews. Combined, these two MSAs represent 73% of the bank's deposits and 70% of the loans originated/purchased during this evaluation period.

The Lakeland-Winter Haven MSA, West Palm Beach-Boca Raton MSA, Volusia County, and the contiguous non-MSA counties of Okeechobee, Indian River, and Highlands received a limited-scope review. Refer to Appendix A for additional information regarding the scope of the evaluation.

All assessment areas are comprised of whole census tracts that meet regulatory requirements. The delineation of assessment areas did not reflect any illegal discrimination and did not arbitrarily exclude low- or moderate-income geographies.

## **Ratings**

The bank's overall rating is based primarily on those assessment areas that received full-scope reviews.

RNBF's overall ratings under each test are the consolidation of conclusions reached for each full-scope assessment area. When consolidating full-scope assessment area conclusions into overall ratings, more weight was given to the Fort Pierce-Port Saint Lucie assessment area than the Melbourne-Titusville-Palm Bay assessment area. The Fort Pierce-Port Saint Lucie assessment area was more heavily weighted because it has a larger number of HMDA and CRA reported loans and a greater volume of deposits. During the evaluation period, 47% of loans originated/purchased and 52% of deposits (as of June 30, 2002) were in the Fort Pierce-Port Saint Lucie MSA. In contrast, 23% percent of loans and 21% of deposits were in the Melbourne-Titusville-Palm Bay assessment area.

Home mortgage products were weighted more heavily than small loans to businesses. Within the home mortgage category, home purchase loans received somewhat more weight than refinance loans because of stated assessment areas needs and loan volume. Home improvement loans received the least weight. This weighting is consistent with the bank's loan volume by product type during the evaluation period. Of HMDA loans reported, home purchase and refinance loans represented 40% and 36%, respectively, while home improvement loans represented only 24%.

## **Other**

Community credit needs in the assessment areas were determined by conducting community contacts, reviewing applicable U. S. Department of Housing and Urban Development (HUD) 5-Year Consolidated Plans, and reviewing recent community contacts conducted by the OCC in connection with other CRA examinations of banks operating in the same assessment areas.

Two community contacts were conducted during the evaluation; one in each of the full-scope assessment areas. In the Fort Pierce-Port Saint Lucie MSA the contact was a local government entity involved in federally subsidized affordable housing. Two primary needs were identified, the most critical of which was the availability of affordable housing for low-and moderate-income people. There is a need for the development of

additional affordable owner-occupied and rental housing in the assessment area. In order to purchase affordable housing, there is a need for flexible, low-interest rate lending products that require a limited down payment. Also, the current stock of privately owned multi-family housing units is in need of rehabilitation. The second primary need in the assessment area is financial education. This would include programs on home ownership, budgeting and credit.

The contact in the Melbourne-Titusville-Palm Bay MSA was a local government entity involved in providing subsidized programs for home ownership and housing rehabilitation as well as community development and redevelopment programs. The critical need identified was again affordable housing development and purchase financing. There is also a need to revitalize and stabilize targeted low- and moderate-income communities within the MSA.

## **Fair Lending Review**

We found no evidence of illegal discrimination or other illegal credit practices.

## Conclusions with Respect to Performance Tests

### LENDING TEST

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

The bank's performance under the Lending Test is rated "high satisfactory". Based on full-scope reviews, the bank's performance in the Fort Pierce-Port Saint Lucie MSA is good and in the Melbourne-Titusville-Palm Bay MSA performance is adequate.

#### Lending Activity

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

Overall, lending activity reflects adequate responsiveness to credit needs in RNBF's full-scope assessment areas. Lending activity reflects adequate responsiveness to the credit needs in both the Fort Pierce-Port Saint Lucie MSA and the Melbourne-Titusville-Palm Bay MSA.

The bank's lending activity in the Fort Pierce-Port Saint Lucie MSA is adequate when deposit market share is compared with loan market share. Based on FDIC deposit data as of June 30, 2002, RNBF's deposit market share of 15.0% ranked second among financial institutions operating in the MSA. By comparison, RNBF's 2002 market share of HMDA loans was 4.5%, which ranked fifth among lenders reporting HMDA originations/purchases in the MSA. Of the lenders ranked ahead of RNBF in the Fort Pierce-Port Saint Lucie MSA, two were national financial institutions with branch offices in the MSA and two were community financial institutions also headquartered in the Treasure Coast market.

For specific HMDA products, RNBF ranked 8<sup>th</sup> for home purchase loans (3.20% market share) and 9<sup>th</sup> for home refinance loans (3.01% market share). For home improvement loans, the bank ranked first with a market share of 28.51%. In the Fort Pierce-Port Saint Lucie MSA, home improvement loans represent the smallest number of HMDA reported loans. During the evaluation period, 29% of RNBF's HMDA loans in the MSA were home improvement loans. Home improvement lending received less weight than home purchase and home refinance lending in our evaluation.

In 2002, the bank's market share of small business loans in the Fort Pierce-Port Saint Lucie MSA was 4.27%, which ranked 7<sup>th</sup> among all lenders reporting small business loans in the MSA. However, all of the lenders with market shares greater than RNBF are national credit card lenders such as Capital One and American Express, which do not take deposits in the assessment area. During the evaluation period, 23% of the bank's loan originations/purchases in the Fort Pierce-Port Saint Lucie MSA were small business loans, and they were therefore given less weight in our analysis than HMDA loans.

The bank's lending activity in the Melbourne-Titusville-Palm Bay MSA was adequate when deposit market share is compared with loan market share. Based on FDIC deposit data as of June 30, 2002, RNBF ranked 5<sup>th</sup> with a deposit market share of 5.81% in the MSA. By comparison, RNBF's 2002 market share of HMDA loans was 1.55%, which ranked 17<sup>th</sup> among lenders reporting HMDA originations/purchases in the MSA. Of the lenders ranked ahead of RNBF, 10 are mortgage originators that do not take deposits in the MSA. Six are regional or community financial institutions that have branch offices in the MSA.

By HMDA product, the bank ranked 19<sup>th</sup> for both home purchase and home refinance loans, with market shares of 1.51% and 1.08%, respectively. Regarding home improvement loans, the bank ranked 4<sup>th</sup> with a market share of 7.36%. As noted above, home improvement loans receive less weight than home purchase and home refinance loans since they represent a smaller volume of lending. During the evaluation period, 17% of the bank's HMDA loans in the Melbourne-Titusville-Palm Bay MSA were home improvement loans.

In 2002, the bank's market share of small business loans in the Melbourne-Titusville-Palm Bay MSA was 1.98%, which ranked 10<sup>th</sup> among all lenders reporting small business loans in the MSA. However, all but two of the lenders with market shares greater than RNBF are national credit card lenders such as Capital One and American Express, which do not take deposits in the assessment area. During the evaluation period, 20% of the bank's loan originations/purchases in the Melbourne-Titusville-Palm Bay MSA were small business loans, and they were therefore given less weight in our analysis than HMDA loans.

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

Overall, the geographic distribution of loans is adequate. Geographic distribution was adequate in both the Fort Pierce-Port Saint Lucie MSA and the Melbourne-Titusville-Palm Bay MSA. The geographic distribution of home mortgage loans is adequate. The geographic distribution of small business loans is good.

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

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

The overall geographic distribution of home mortgage loans in the full-scope assessment areas is adequate. The geographic distribution of home mortgage loans is adequate in the Fort Pierce-Port Saint Lucie MSA and the Melbourne-Titusville-Palm Bay MSA.

Conclusions are based primarily on performance in moderate-income geographies. As shown in the tables in Appendix C, the low-income geographies in both full-scope

MSAs provide very limited opportunities for lending. There are only three low-income geographies in the Fort Pierce-Port Saint Lucie MSA, and one in the Melbourne-Titusville-Palm Bay MSA resulting in a very small number of owner-occupied housing units (1,414 in the Fort Pierce-Port Saint Lucie MSA and 553 in the Melbourne-Titusville-Palm Bay MSA). Consequently, the level of home purchase and home refinance lending in low-income geographies is minimal. The situation is similar for small business loans. Only 4% of small businesses in the Fort Pierce-Port Saint Lucie MSA are located in low-income geographies and only 1% of the businesses in the Melbourne-Titusville-Palm Bay MSA are located in low-income geographies.

The geographic distribution of *home purchase loans is adequate*. The geographic distribution of home purchase loans is adequate in both the Fort Pierce-Port Saint Lucie MSA and the Melbourne-Titusville-Palm Bay MSA.

In the low-income geographies of the Fort Pierce-Port Saint Lucie MSA the bank did not originate/purchase any home purchase loans during the evaluation period. In the moderate-income geographies, the percent of the bank's loans is somewhat lower than the level of owner-occupied housing units in these geographies. The bank's market share of home purchase loans in moderate-income geographies exceeds the bank's overall market share.

In the Melbourne-Titusville-Palm Bay MSA the bank did not originate/purchase any home purchase loans in low-income geographies. The bank's percent of home purchase loans in moderate-income geographies is somewhat lower than the level of owner-occupied housing units in those geographies. RNBF's market share of loans in moderate-income geographies is somewhat lower than its overall market share.

The geographic distribution of *home improvement loans is excellent*. The geographic distribution of home improvement loans is excellent in the Fort Pierce-Port Saint Lucie MSA and good in the Melbourne-Titusville-Palm Bay MSA.

The level of home improvement loans in both the low- and moderate-income geographies of the Fort Pierce-Port Saint Lucie MSA exceeds the level of owner-occupied housing units in each of those geographies. The bank's market share of home improvement loans in both low- and moderate-income geographies exceeds the bank's overall market share of home improvement loans in the MSA.

In the Melbourne-Titusville-Palm Bay MSA, the level of home improvement loans in low-income geographies is somewhat lower than the level of owner-occupied housing units in those geographies. In moderate-income geographies, the level of home improvement loans is near to the level of owner-occupied housing units. In both low- and moderate-income geographies, the bank's market share of home improvement loans exceeds the bank's overall market share of such loans.

The geographic distribution of *home refinance loans is adequate*. The geographic distribution of home refinance loans in the Fort Pierce-Port Saint Lucie MSA is

adequate. The geographic distribution of home refinance loans is adequate in the Melbourne-Titusville-Palm Bay MSA.

In the low-income geographies of the Fort Pierce-Port Saint Lucie MSA, the level of RNBF's home refinance loans is somewhat lower than the level of owner-occupied housing units. In the moderate-income geographies, the level of the bank's home refinance loans is somewhat lower than the level of owner-occupied housing units. The bank's market share of home refinance loans in low-income geographies is near to its overall market share. In moderate-income geographies, the bank's market share of home refinance loans exceeds its overall market share.

The bank did not originate/purchase any home refinance loans in the low-income geographies of the Melbourne-Titusville-Palm Bay MSA. In moderate-income geographies, the level of home refinance loans is somewhat lower than the level of owner-occupied housing units. In moderate-income geographies, the bank's market share of home refinance loans exceeds the bank's overall market share.

### ***Multi-Family Housing Loans***

Refer to Table 5 in Appendix C for the facts and data regarding the bank's multi-family housing loans.

The level of the bank's multi-family housing loans is not sufficient for analysis.

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

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

The geographic distribution of *small loans to businesses is good*. The geographic distribution of small loans to businesses in the Fort Pierce-Port Saint Lucie MSA is good. The geographic distribution of small loans to business in the Melbourne-Titusville-Palm Bay MSA is excellent.

In the low-income geographies of the Fort Pierce-Port Saint Lucie MSA, the bank's level of small loans to businesses exceeds the level of businesses in those geographies. In moderate-income geographies, the level of RNBF's loans to small businesses is near to the level of businesses in those geographies. In both low- and moderate-income geographies, the bank's market share exceeds its overall market share.

Considering limited opportunities (346 businesses) in the Melbourne-Titusville-Palm Bay MSA, the level of the bank's small loans to businesses in low-income geographies is near the level of businesses in such geographies. In moderate-income geographies, the level of RNBF's small loans to businesses exceeds the level of businesses located in those geographies. In low-income geographies, the bank's market share of small loans to businesses is near to its overall market share. In moderate-income

geographies, the bank's market share of small loans to businesses exceeds its overall market share.

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

Refer to Table 7 in Appendix C for the facts and data regarding the bank's origination/purchase of small loans to farms.

The volume of the bank's small loans to farms is not sufficient for a meaningful analysis.

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

We evaluated the lending distribution in each of the full-scope assessment areas to determine if any unexplained conspicuous gaps existed. No unexplained gaps were identified.

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

RNBF's lending activity reflects excellent concentration within its assessment areas. A substantial majority of the bank's loan originations is within its six defined assessment areas. Overall, 98% of the bank's loan originations are within the bank's assessment areas. By product, 98% of HMDA loans, 96% of small loans to businesses, and 93% of small loans to farms are in the bank's assessment areas. This performance had a positive effect on the bank's overall geographic distribution analysis.

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

The overall dispersion of loans among borrowers of different income levels is excellent, based on performance context. The dispersion of loans in the Fort Pierce-Port Saint Lucie MSA is excellent, based on performance context. The dispersion of loans in the Melbourne-Titusville-Palm Bay MSA is good, based on performance context. Our conclusions are based on the dispersion of home mortgage loans only. The dispersion of small business loans could not be determined. Only 39% of the bank's reported small loans to businesses contained revenue size information. Management indicated that the remaining 61% of loans were generally motor vehicle loans for which the revenue size of the business is not used in the credit decision and is therefore not obtained.

Performance context information related to income levels and housing costs was considered in evaluating home mortgage lending. RNBF operates in assessment areas where the cost of housing is high when compared with income levels, as discussed in the assessment area profiles contained in Appendix B. In the Fort Pierce-Port Saint Lucie MSA, a low-income family earned \$26,200 or less in 2002. When compared with a 2000 Census median housing value of \$97,335 it is evident that low-income families would have great difficulty purchasing a home in the MSA. The situation is similar in the Melbourne-Titusville-Palm Bay MSA where a low-income family earned \$26,450 or

less in 2002 while the 2000 Census median housing value is \$93,117. Updated information from the National Board of Realtors indicated that prices of existing single-family homes in the Melbourne-Titusville-Palm Bay MSA are actually higher, reaching a median level of \$112,700 in 2002. Also to be considered is the fact that 9% of households in each of the MSAs is living below the poverty level. In addition to home purchase, opportunities for lending to low-income borrowers for home refinance loans would also be limited.

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

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

The overall dispersion of home mortgage loans is excellent, given performance context. The dispersion of home mortgage loans in the Fort Pierce-Port Saint Lucie MSA is excellent, given performance context. The dispersion of home mortgage loans in the Melbourne-Titusville-Palm Bay MSA is good, given performance context.

The dispersion of *home purchase loans is excellent, given performance context*. The dispersion of home purchase loans is excellent in the Fort Pierce-Port Saint Lucie MSA and good in the Melbourne-Titusville-Palm Bay MSA, given performance context. Affordable mortgage financing for low- and moderate-income borrowers is a pressing need both the bank's assessment areas.

In the Fort Pierce-Port Saint Lucie MSA, the bank's percent of home purchase loans to low-income borrowers is somewhat lower than the percent of families that are defined as such. RNBF's percent of home purchase loans to moderate-income borrowers exceeds the level of moderate-income families in the MSA. The bank's market share for home purchase loans to low-income borrowers exceeds its overall market share. The bank's market share for home purchase loans to moderate-income borrowers is somewhat lower than its overall market share.

RNBF's percent of home purchase loans to low-income borrowers in the Melbourne-Titusville-Palm Bay MSA is lower than the level of families that are defined as such. The bank's level of home purchase loans to moderate-income borrowers is somewhat lower than the MSA's level of moderate-income families. The bank's market share of home purchase loans to low-income borrowers is somewhat lower than its overall market share. The bank's market share of home purchase loans to moderate-income borrowers is lower than its overall market share.

The dispersion of *home improvement loans is excellent, given performance context*. The dispersion of home improvement loans is excellent in the Fort Pierce-Port Saint Lucie MSA and excellent in the Melbourne-Titusville-Palm Bay MSA, given performance context.

In the Fort Pierce-Port Saint Lucie MSA, RNBF's percent of home improvement loans to low-income borrowers is somewhat lower than the level of low-income families in the MSA. The bank's percent of home improvement loans to moderate-income borrowers exceeds the percent of families that are defined as such. The bank's market share for home improvement loans to low-income families exceeds its overall home improvement loan market share. The bank's market share for home improvement loans to moderate-income families also exceeds its overall market share.

In the Melbourne-Titusville-Palm Bay MSA, the bank's percent of home improvement loans to low-income borrowers is somewhat lower than the level of families defined as such. The bank's percent of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families in the MSA. RNBF's market share of home improvement loans to low-income borrowers exceeds its overall market share. The bank's market share of home improvement loans to moderate-income borrowers also exceeds its overall market share.

The dispersion of *home refinance loans is excellent, given performance context*. In both the Fort Pierce-Port Saint Lucie MSA and the Melbourne-Titusville-Palm Bay MSA the dispersion is excellent, given performance context.

In the Fort Pierce-Port Saint Lucie MSA, RNBF's percent of home refinance loans to low-income borrowers is somewhat lower than the level of low-income families in the MSA. The bank's percent of home refinance loans to moderate-income borrowers exceeds the percent of families that are defined as such. The bank's market share for home refinance loans to low-income families exceeds its overall home refinance loan market share. The bank's market share for home refinance loans to moderate-income families exceeds its overall market share.

In the Melbourne-Titusville-Palm Bay MSA, the bank's percent of home refinance loans to low-income borrowers is somewhat lower than the level of families defined as such. The bank's percent of home refinance loans to moderate-income borrowers exceeds the percent of moderate-income families in the MSA. RNBF's market share of home refinance loans to low-income borrowers exceeds its overall market share. The bank's market share of home refinance loans to moderate-income borrowers also exceeds its overall market share.

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

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

The dispersion of small loans to businesses cannot be determined. Revenue size information is available for only 39% of the bank's reported small loans to businesses. That amount is not sufficient for a meaningful analysis.

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

Refer to Table 12 in Appendix C for the facts and data regarding the borrower distribution of the bank's origination/purchase of small loans to farms.

The volume of the bank's small loans to farms is not sufficient for a meaningful analysis.

### **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.

The bank did not report any community development loans during the evaluation period in any of its assessment areas. This had a neutral impact on the lending test.

### **Product Innovation and Flexibility**

RNBF has an internal Affordable Housing product directed to low- and moderate-income borrowers that provides flexible underwriting standards. The product is not considered innovative and it had a neutral impact on the Lending Test.

During the evaluation period, the bank originated seven Affordable Housing loans in its full-scope assessment areas totaling \$616 thousand. Five of the loans (\$364 thousand) were in the Fort Pierce-Port Saint Lucie MSA. The remaining loans were in the Melbourne-Titusville-Palm Bay MSA.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Non-MSA Counties, the Lakeland-Winter Haven MSA, Volusia County and the West Palm Beach-Boca Raton MSA is not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in both the Fort Pierce-Port Saint Lucie MSA and the Melbourne-Titusville-Palm Bay MSA is good.

Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments. Also refer to the profile in Appendix B for a discussion of available opportunities.

**Current Period Investments:**

In the Fort Pierce-Port St. Lucie MSA, RNBF purchased seven community development investments totaling \$1.7 million. In the Melbourne-Titusville-Palm Bay MSA, RNBF purchased four community development investments that totaled \$1.9 million. All of the investments are mortgage-backed securities issued by the Federal Home Loan Mortgage Corporation (FHLMC) or the Federal National Mortgage Association (FNMA). The underlying collateral for all securities consist of mortgage loans made to low- and moderate-income borrowers residing in the two full-scope MSAs. These investments are responsive to assessment area credit needs, meeting the identified need for affordable housing financing for low- and moderate-income families.

In addition to investments directly in the two full-scope MSAs, the bank made three statewide investments totaling \$19 thousand. These are equity investments in non-profit lending consortiums that provide financing for affordable housing to low- and moderate-income families throughout the State of Florida, including in the bank's assessment areas. There is also a \$19 thousand unfunded, legally binding commitment to one of these statewide organizations.

**Current Period Grants and Donations:**

RNBF contributed \$2,575 to non-profit organizations in the Fort Pierce-Port St. Lucie MSA and \$4,500 in the Melbourne-Titusville-Palm Bay MSA. The donations and grants were to organizations that had as their primary missions affordable housing for low- or moderate-income individuals and community services targeted to low- or moderate-income individuals.

**Prior Period Investments:**

In the two full-scope assessment areas, 13 community development investments were purchased before the current evaluation period began and remain outstanding. These investments were FHLMC and GNMA bonds with a book value of \$719 thousand at December 31, 2003. These investments are mortgage-backed securities where the underlying collateral consists of mortgages to low- and moderate-income individuals in the two full-scope MSAs.

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

Based on limited-scope reviews, the bank's performance under the Investment Test in the Non-MSA Counties is not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test. When consideration is given to the low level of deposits in the Lakeland-Winter Haven MSA, Volusia County and West Palm Beach-

Boca Raton MSA assessment areas, the bank's performance in those assessment areas is stronger than the bank's overall Low Satisfactory performance under the Investment Test. The stronger performance has no impact on the overall rating.

## **SERVICE TEST**

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

The bank's performance under the Service Test is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance is adequate in both the Fort Pierce-Port St. Lucie MSA and the Melbourne-Titusville MSA.

#### **Retail Banking Services**

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

RNBF's delivery systems are accessible to geographies and individuals of different income levels throughout the full-scope assessment areas. Accessibility is good in the Fort Pierce-Port St. Lucie MSA and adequate in the Melbourne-Titusville MSA. In the Fort Pierce-Port St. Lucie MSA, the bank has no offices in low-income geographies. However, the main office, which is located in a middle-income geography, borders a low-income geography. Also, another branch, which is located in a moderate-income geography, is in close proximity (less than 1 mile) to a low-income geography. The percent of RNBF's offices throughout moderate-income geographies exceeds the percent of the population living in such geographies.

In the Melbourne-Titusville MSA, no offices are located in low-income geographies. However, the bank's Merritt Island office, which is located in a middle-income geography, is in close proximity (approximately 1 mile) to the one low-income census tract in the MSA. The percent of RNBF's offices throughout moderate-income geographies is somewhat lower than the percent of the population living in such geographies.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, RNBF opened six offices in the two full-scope assessment areas. No branches were closed during the evaluation period.

The bank offers a wide range of banking products and services throughout the full-scope assessment areas. Products, services and business hours do not vary in a way that inconveniences low- and moderate-income geographies or individuals. A list of branch operating hours is available in the bank's public file.

Alternative delivery systems within the full-scope assessment area are limited. To the extent they are available, they do not materially improve access among low- and moderate-income individuals or geographies. Automated Teller Machines (ATMs) are available at each full service branch location.

## **Community Development Services**

RNBF's performance in providing community development services in the full-scope assessment areas is poor, given available opportunities, its size and resources. Performance was poor in both the Fort Pierce-Port St. Lucie MSA and the Melbourne-Titusville MSA. Refer to the assessment area profiles in Appendix C for a discussion about available opportunities.

In the Fort Pierce-Port St. Lucie MSA, RNBF and its officers provide a limited level of community development services to organizations located throughout the MSA. During this evaluation period, a total of three directors and officers of RNBF provided technical assistance to three community organizations whose activities meet the definition of community development under the CRA. These services were not innovative or responsive to the most pressing identified needs in the assessment area, such as affordable housing for low- and moderate-income individuals. The mission of two organizations – Salvation Army and Comprehensive Offender Rehabilitation education (CORE) – is to provide community services to low- and moderate-income individuals. The mission of the third organization, Fort Pierce Mainstreet, is to facilitate redevelopment and revitalization of low- and moderate-geographies by providing low interest loans to commercial tenants in the downtown district to improve, maintain and preserve their properties.

In the Melbourne-Titusville MSA, the bank provides a limited level of community development services. The bank's only identifiable community development service in the assessment area was an officer's involvement with the local chapter of Habitat for Humanity. The bank officer is currently Chairman of the Board of the Brevard County Habitat for Humanity, an organization dedicated to providing affordable housing for low- and moderate-income families.

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

Based on limited-scope reviews, the bank's performance under the Service Test in Volusia County, the West Palm Beach MSA, the Lakeland-Winter Haven MSA, and the three contiguous non-MSA counties is stronger than the bank's overall "Low Satisfactory" performance under the Service Test. In limited-scope assessment areas only branch distribution is considered in reaching a conclusion regarding the bank's performance. The stronger performance has no impact on the overall rating.

## 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): (1/1/00 to 12/31/02) Retail Services: (1/1/00 to 12/31/02) Investment Test, Community Development Services and CD Loans: (12/19/00 to 3/15/04)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Riverside National Bank of Florida Fort Pierce, FL	HMDA Loans Small Loans to Businesses	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Ft.Pierce-Port St. Lucie MSA 2710	Full-Scope	
Melbourne-Titusville-Palm Bay MSA 4900	Full-Scope	
Lakeland-Winter Haven MSA 3980	Limited-Scope	
West Palm Beach-Boca Raton MSA 8960	Limited-Scope	
Volusia County (part of MSA 2020)	Limited-Scope	
Non-MSA Counties: Okeechobee, Indian River, Highlands	Limited-Scope	

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

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### **Table of Contents**

#### **Market Profiles for Areas Receiving Full-Scope Reviews**

Fort Pierce-Port Saint Lucie MSA

Melbourne-Titusville-Palm Bay MSA

**Fort Pierce-Port Saint Lucie MSA 2710**

Demographic Information for Full-Scope Area: Fort Pierce-Port Saint Lucie						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	58	5.17	15.52	53.45	20.69	5.17
Population by Geography	251,071	5.99	11.92	62.59	19.49	0.01
Owner-Occupied Housing by Geography	75,091	1.88	11.32	63.95	22.85	0.00
Businesses by Geography	20,043	3.80	23.55	54.84	17.80	0.00
Farms by Geography	824	2.67	17.48	66.99	12.86	0.00
Family Distribution by Income Level	73,773	18.18	19.05	23.65	39.12	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	27,465	8.56	16.45	61.81	13.18	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$33,541 = \$52,400 =9.89%	Median Housing Value Unemployment Rate (2002)		= 100,622 =5.5%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The bank’s assessment area consists of all of the Fort Pierce-Port Saint Lucie MSA (2710), which is equivalent to the boundaries of Martin County and Saint Lucie County, adjacent to and north of Martin County. Saint Lucie County, where RNBF is headquartered, is the larger of the two counties with 43,644 families compared with 30,129 families in Martin County, based on 1990 Census data. The city of Fort Pierce, county seat of Saint Lucie, has only grown moderately since the early 1990s. In contrast, the city of Port Saint Lucie is a rapidly growing young community.

Based on the 1990 Census, the MSA consisted of 58 geographies, or census tracts. About 21% of the geographies were categorized as low- or moderate-income. These low- and moderate-income geographies are generally located in the northern portion of Saint Lucie County, in and around the city of Fort Pierce. In the 2000 Census, only the number of moderate-income geographies increased, bringing the overall level of low- and moderate-income geographies to 27%.

Situated in the Treasure Coast Region, the MSA is one of the fastest growing portions of Florida. According to the 1990 Census, the total population was approximately 250 thousand. The 2000 Census shows the MSA population to be approximately 319 thousand, a 27% increase. The growth is primarily the result of people, many of whom are retirees, relocating from other portions of the United States. The level of owner-occupied housing units increased (39%), particularly in Saint Lucie County, to meet the

population growth. The largest growth can be found in the upper- and middle-income geographies however, the percentage of owner-occupied housing units among the various income geographies in the MSA remained virtually unchanged between the 1990 and 2000 Census.

When compared with incomes, housing costs in the MSA are high, particularly new construction. As shown in the table above, the median housing value is \$100,622. When compared with a HUD Adjusted Median Family Income of \$52,400 for 2002, it is clear that the purchase of single family housing in the MSA is difficult for a low- income family, who would earn, at most, \$26,200 annually. Some moderate-income families, who would earn, at most, \$41,920 annually, may also experience difficulty.

The local economy is primarily based on the building trades, service businesses, and agriculture. The unemployment rate for the MSA is higher than for the state of Florida with the highest unemployment rates being found in the city of Fort Pierce. In 2001, the MSA's annual unemployment rate was 7.2% and in 2002, 7.0%. For the State, the annual unemployment rate was 4.8% for 2001 and 5.5% for 2002, based on data from the Bureau of Labor Statistics.

Competition within the MSA is strong. FDIC data as of June 30, 2002 showed 113 banking offices of 17 national, regional, and community financial institutions operating in the MSA. There were 517 lenders reporting mortgage loans under the Home Mortgage Disclosure Act ("HMDA") in 2002, and 75 lenders reporting small business loans. Many of the top ten mortgage lenders are mortgage companies that operate nationally or are subsidiaries of some of the largest financial institutions in the nation. National credit card lenders dominate the small business loan market. In 2002, the top six small business lenders were credit card companies that had a combined market share of 73% in the Fort Pierce-Port Saint Lucie MSA.

The primary credit needs identified through community contacts conducted for this examination and for other examinations of banks operating in the same assessment area are financing for the purchase of affordable housing, financing for the construction of single-family and multi-family affordable housing, and financing for the repair or rehabilitation of existing housing. There is also a need for financial education, job training programs and the revitalization of the downtown area.

Opportunities for the bank to make community development loans and investments are somewhat limited, but growing and competition for community development activity is strong because of the number of financial institutions operating in the MSA. Opportunities for community development service participation are greater because of the number of organizations providing community services to low- and moderate-income individuals and families. Many of these organizations do not rely on loans and investments from the private sector. Affordable housing development in the MSA is at modest levels. The number of Community Development Corporations ("CDCs") and Community Development Financial Institutions ("CDFIs") operating in the area is small, but growing. Investment opportunities include, but are not limited to, bonds for low- and moderate-income housing, investments in mortgage loan pools, investments in CDFIs,

and contributions to community organizations whose primary mission meets the definition of community development.

**Melbourne-Titusville-Palm Bay MSA 4900**

Demographic Information for Full-Scope Area: Melbourne-Titusville-Palm Bay						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	89	1.12	24.72	51.69	19.10	3.37
Population by Geography	398,978	1.07	22.08	59.38	17.45	0.02
Owner-Occupied Housing by Geography	111,742	0.49	18.78	60.27	20.45	0.00
Businesses by Geography	34,636	.99	28.27	50.18	20.55	0.00
Farms by Geography	1,100	0.64	19.18	61.27	18.91	0.00
Family Distribution by Income Level	114,375	17.64	19.92	24.18	38.26	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	42,958	1.96	31.68	56.04	10.33	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$35,402 = \$52,900 =8.86%	Median Housing Value Unemployment Rate (2002)		= 81,439 =5.4%		

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2002 HUD updated MFI.

The bank’s assessment area consists of all of the Melbourne-Titusville-Palm Bay MSA (4900), which is equivalent to the boundaries of Brevard County. Between the 1990 and 2000 Census, the MSA’s population grew 19% from approximately 399 thousand to 476 thousand. Population is generally concentrated in the cities from which the MSA derived its title. The level of owner-occupied housing units increased between the Censuses by an equal amount to accommodate the population influx. The highest growth rate was in the upper-income geographies where the number of owner-occupied housing units more than doubled. However, the percentage of owner-occupied housing units among the various income geographies in the MSA remained virtually unchanged between the 1990 and 2000 Census.

Based on the 1990 Census, the MSA consisted of 89 geographies, or census tracts. About 26% of the geographies were categorized as low- or moderate-income. These low- and moderate-income geographies are scattered throughout the MSA. In the 2000 Census, an additional low-income census tract was designated, but the level of moderate-income census tracts declined by three, bringing the overall level of low- and moderate-income geographies to 23%.

When compared with income levels, housing costs in the MSA are high. In 2002, the median sales price of an existing single-family home in the MSA was \$112,700, according to the National Association of Realtors. Prices of newly constructed homes generally exceed that amount. When compared with a HUD Adjusted Median Family Income of \$52,900 for 2002, it is clear that the purchase of single family housing in the MSA is difficult for a low- income family, who would earn, at most, \$26,450 annually. Some moderate-income families, who would earn, at most, \$42,320 annually, may also experience difficulty.

The MSA is home to the John F. Kennedy Space Center. It, and the companies that provide support services, provide many job opportunities. Patrick Air Force Base is also located in the MSA. The building trades, service businesses, and, to a lesser extent, agriculture, also provide job opportunities throughout the MSA. The unemployment rate in the MSA is slightly lower than for the state of Florida. In 2001, the MSA's annual unemployment rate was 4.3% and in 2002, 5.4%. For the State, the annual unemployment rate was 4.8% for 2001 and 5.5% for 2002, based on data from the Bureau of Labor Statistics.

Competition within the MSA is strong. FDIC data as of June 30, 2002 showed 126 banking offices of 20 national, regional, and community financial institutions operating in the MSA. There were 528 lenders reporting mortgage loans under the Home Mortgage Disclosure Act ("HMDA") in 2002, and 77 lenders reporting small business loans. Many of the top ten mortgage lenders are mortgage companies that operate nationally or are subsidiaries of some of the largest financial institutions in the nation. National credit card lenders dominate the small business loan market. In 2002, the top four small business lenders were credit card companies that had a combined market share of 60% in the MSA.

The primary credit needs identified through community contacts conducted for this examination and for other examinations of banks operating in the same assessment area are financing for the purchase of affordable housing, financing for the construction of single-family affordable housing, and financing for the repair or rehabilitation of existing housing. There is also a need for the revitalization and stabilization of six communities targeted as special Community Development Block Grant Neighborhoods by Brevard County.

Opportunities for the bank to make community development loans and investments are limited, but growing and competition for them is strong, based on the number of financial institutions operating in the MSA. Opportunities for community development service participation are greater because of the number of organizations providing community services to low- and moderate-income individuals and families. Many of these organizations do not rely on loans and investments from the private sector. Little affordable housing is being developed in the MSA and the number of Community Development Corporations ("CDCs") and Community Development Financial Institutions ("CDFIs") operating in the MSA is small. However, the county has implemented several affordable housing initiatives and is developing revitalization plans for six targeted

neighborhoods throughout the MSA. Investment opportunities include, but are not limited to, bonds for low- and moderate-income housing issued by the state and the county, mortgage loan pools, and contributions to community organizations whose primary mission meets the definition of community development.

# Appendix C: Tables of Performance Data

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## Table of Contents

CONTENT OF STANDARDIZED TABLES.....C-2  
TABLES OF PERFORMANCE DATA ..... C-5

## Content of Standardized Tables

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References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/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. 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. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- 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. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

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

Institution ID: 10000017437 **RIVERSIDE NATIONAL BANK OF FL**

**Table 1. Lending Volume**

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002						
MA/Assessment Area (2002):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Fort Pierce-Port St. Lucie MSA	47.17	3,466	213,530	1,061	62,346	84	6,588	0	0	4,611	282,464	0.00
Melbourne-Titusville-Palm Bay MSA	22.96	1,795	162,007	438	39,633	12	859	0	0	2,245	202,499	0.00
<b>Limited Review:</b>												
M 3 Adjacent Non-MSA Counties	15.06	1,022	85,066	395	39,398	55	6,253	0	0	1,472	130,717	0.00
Lakeland-Winter Haven MSA	1.48	83	3,992	45	6,927	17	1,988	0	0	145	12,907	0.00
Volusia County	4.51	311	16,437	124	7,877	6	108	0	0	441	24,422	0.00
West Palm Beach MSA	8.82	600	83,332	257	23,841	5	325	0	0	862	107,498	0.00

\* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is From January 01, 2000 to March 15, 2003.

\*\*\* Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: 1000017437 RIVERSIDE NATIONAL BANK OF FL

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Fort Pierce-Port St. Lucie MSA	1,152	39.78	1.88	0.00	11.32	6.60	63.95	73.78	22.85	19.44	2.89	0.00	3.22	3.03	2.47	
Melbourne-Titusville-Palm Bay MSA	848	29.28	0.49	0.00	18.78	9.55	60.27	64.27	20.45	26.18	1.53	0.00	1.21	1.48	1.91	
<b>Limited Review:</b>																
3 Adjacent Non-MSA Counties	485	16.75	0.00	0.00	5.56	0.82	65.72	51.55	28.72	47.63	2.77	0.00	0.65	3.18	2.30	
Lakeland-Winter Haven MSA	30	1.04	0.41	3.33	13.70	10.00	69.09	70.00	16.79	16.67	0.15	9.09	0.28	0.14	0.08	
Volusia County	69	2.38	1.46	0.00	12.25	5.80	74.09	86.96	12.19	7.25	0.15	0.00	0.08	0.17	0.09	
West Palm Beach MSA	312	10.77	0.94	0.00	20.87	14.42	46.30	31.41	31.90	54.17	0.23	0.00	0.26	0.15	0.34	

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

\*\* 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Institution ID: 10000017437 RIVERSIDE NATIONAL BANK OF FL

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

Geographic Distribution: HOME IMPROVEMENT		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
Fort Pierce-Port St. Lucie MSA	996	55.74	1.88	3.11	11.32	12.45	63.95	69.68	22.85	14.66	30.34	33.33	52.78	29.02	26.82
Melbourne-Titusville-Palm Bay MSA	307	17.18	0.49	0.33	18.78	16.29	60.27	68.73	20.45	14.66	8.33	50.00	9.15	8.59	6.75
<b>Limited Review:</b>															
3 Adjacent Non-MSA Counties	202	11.30	0.00	0.00	5.56	1.49	65.72	55.45	28.72	43.07	9.58	0.00	2.70	6.87	20.14
Lakeland-Winter Haven MSA	23	1.29	0.41	0.00	13.70	4.35	69.09	78.26	16.79	17.39	0.58	0.00	0.00	0.58	0.93
Volusia County	120	6.72	1.46	0.00	12.25	10.00	74.09	85.83	12.19	4.17	4.08	0.00	3.67	4.56	2.03
West Palm Beach MSA	139	7.78	0.94	2.88	20.87	15.11	46.30	59.71	31.90	22.30	0.84	0.00	0.85	1.31	0.38

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

\*\* 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Institution ID: 10000017437 RIVERSIDE NATIONAL BANK OF FL

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

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography *				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Fort Pierce-Port St. Lucie MSA	1,315	50.85	1.88	1.14	11.32	7.76	63.95	74.30	22.85	16.65	3.98	3.75	7.20	4.39	2.59	
Melbourne-Titusville-Palm Bay MSA	638	24.67	0.49	0.00	18.78	12.70	60.27	67.71	20.45	19.59	1.55	0.00	1.81	1.70	1.09	
<b>Limited Review:</b>																
3 Adjacent Non-MSA Counties	335	12.95	0.00	0.00	5.56	1.19	65.72	52.54	28.72	46.27	2.80	0.00	2.67	2.31	3.42	
Lakeland-Winter Haven MSA	30	1.16	0.41	0.00	13.70	13.33	69.09	70.00	16.79	16.67	0.16	0.00	0.33	0.15	0.13	
Volusia County	121	4.68	1.46	0.00	12.25	7.44	74.09	81.82	12.19	10.74	0.29	0.00	0.28	0.33	0.17	
West Palm Beach MSA	147	5.68	0.94	0.00	20.87	15.65	46.30	37.41	31.90	46.94	0.12	0.00	0.23	0.10	0.13	

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Institution ID: 10000017437 RIVERSIDE NATIONAL BANK OF FL

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

Geographic Distribution: MULTIFAMILY		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002						Market Share (%) by Geography *				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Melbourne-Titusville-Palm Bay MSA	2	25.00	1.03	0.00	33.05	100.00	46.22	0.00	19.70	0.00	5.00	0.00	14.29	0.00	0.00	
Fort Pierce-Port St. Lucie MSA	3	37.50	3.28	0.00	9.29	0.00	45.57	66.67	41.85	33.33	5.56	0.00	0.00	8.33	0.00	
<b>Limited Review:</b>																
West Palm Beach MSA	2	25.00	2.23	0.00	24.05	50.00	36.34	50.00	37.37	0.00	0.00	0.00	0.00	0.00	0.00	
Volusia County	1	12.50	3.83	0.00	22.51	0.00	69.63	100.00	4.04	0.00	2.56	0.00	0.00	4.35	0.00	
Lakeland-Winter Haven MSA	0	0.00	3.12	0.00	23.13	0.00	58.30	0.00	15.45	0.00	0.00	0.00	0.00	0.00	0.00	
3 Adjacent Non-MSA Counties	0	0.00	0.00	0.00	4.70	0.00	29.94	0.00	65.36	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Institution ID: 10000017437 RIVERSIDE NATIONAL BANK OF FL

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002						Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
<b>Full Review:</b>																
Fort Pierce-Port St. Lucie MSA	1,061	45.73	3.80	3.96	23.55	22.53	54.84	65.03	17.80	8.48	4.28	4.36	6.46	4.56	2.66	
Melbourne-Titusville-Palm Bay MSA	438	18.88	0.99	0.68	28.27	34.70	50.18	50.68	20.55	13.93	1.98	1.80	2.10	2.06	2.11	
<b>Limited Review:</b>																
3 Adjacent Non-MSA Counties	395	17.03	0.00	0.00	4.04	2.78	63.62	59.24	32.34	37.97	2.66	0.00	1.72	2.83	3.01	
Lakeland-Winter Haven MSA	45	1.94	2.97	0.00	27.64	20.00	45.48	60.00	23.91	20.00	0.33	0.00	0.38	0.38	0.34	
Volusia County	124	5.34	4.22	0.81	20.68	7.26	63.24	70.97	11.86	20.97	0.36	0.00	0.32	0.35	0.63	
West Palm Beach MSA	257	11.08	3.14	2.75	20.08	37.25	40.46	40.00	36.12	20.00	0.22	0.22	0.42	0.20	0.15	

\* Based on 2002 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 (2003).

Institution ID: 10000017437 RIVERSIDE NATIONAL BANK OF FL

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

Geographic Distribution: SMALL LOANS TO FARMS		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans					
<b>Full Review:</b>															
Fort Pierce-Port St. Lucie MSA	84	46.93	2.67	1.19	17.48	9.52	66.99	82.14	12.86	7.14	0.00	0.00	0.00	0.00	0.00
Melbourne-Titusville-Palm Bay MSA	12	6.70	0.64	0.00	19.18	50.00	61.27	41.67	18.91	8.33	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
3 Adjacent Non-MSA Counties	55	30.73	0.00	0.00	5.55	1.82	73.14	81.82	21.32	16.36	1.27	0.00	0.00	1.69	0.00
Lakeland-Winter Haven MSA	17	9.50	1.14	0.00	22.22	23.53	53.59	70.59	23.04	5.88	0.00	0.00	0.00	0.00	0.00
Volusia County	6	3.35	2.30	0.00	14.72	0.00	71.57	83.33	11.40	16.67	0.00	0.00	0.00	0.00	0.00
West Palm Beach MSA	5	2.79	3.37	0.00	19.14	20.00	49.84	40.00	27.65	40.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2002 Peer Small Business Data: US and PR.

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

\*\*\* Source Data - Dun and Bradstreet (2003).

Institution ID: 10000017437 RIVERSIDE NATIONAL BANK OF FL

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

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002						Market Share <sup>*</sup>				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Full Review:</b>																
Fort Pierce-Port St. Lucie MSA	1,152	39.78	18.18	12.08	19.05	21.04	23.65	24.70	39.12	42.18	3.22	3.40	2.47	2.95	3.71	
Melbourne-Titusville-Palm Bay MSA	848	29.28	17.64	7.87	19.92	14.16	24.18	24.94	38.26	53.03	1.70	1.08	0.88	1.48	2.51	
<b>Limited Review:</b>																
3 Adjacent Non-MSA Counties	485	16.75	15.02	2.55	17.91	14.65	23.21	18.05	43.85	64.76	3.07	1.48	3.05	2.66	3.40	
Lakeland-Winter Haven MSA	30	1.04	18.38	10.71	19.11	25.00	24.10	28.57	38.42	35.71	0.16	0.32	0.14	0.16	0.14	
Volusia County	69	2.38	17.46	13.43	20.36	28.36	24.08	25.37	38.10	32.84	0.17	0.39	0.17	0.15	0.14	
West Palm Beach MSA	312	10.77	18.84	5.54	19.04	18.24	22.59	16.61	39.53	59.61	0.27	0.17	0.25	0.18	0.35	

<sup>\*</sup> Based on 2002 Peer Mortgage Data: Southeast Region 1.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 3.59% of loans originated and purchased by BANK.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information.

<sup>\*\*\*\*</sup> 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.

Institution ID: 10000017437 RIVERSIDE NATIONAL BANK OF FL

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

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****					
<b>Full Review:</b>															
Fort Pierce-Port St. Lucie MSA	996	55.74	18.18	13.80	19.05	26.48	23.65	30.16	39.12	29.55	30.69	36.94	38.18	32.43	23.16
Melbourne-Titusville-Palm Bay MSA	307	17.18	17.64	14.14	19.92	26.64	24.18	22.70	38.26	36.51	8.77	10.40	9.91	8.90	7.72
<b>Limited Review:</b>															
3 Adjacent Non-MSA Counties	202	11.30	15.02	8.63	17.91	11.68	23.21	18.78	43.85	60.91	9.55	7.77	4.17	8.13	14.96
Lakeland-Winter Haven MSA	23	1.29	18.38	9.52	19.11	23.81	24.10	23.81	38.42	42.86	0.63	0.00	0.45	0.59	1.21
Volusia County	120	6.72	17.46	18.33	20.36	20.00	24.08	36.67	38.10	25.00	4.19	7.95	2.23	5.88	3.20
West Palm Beach MSA	139	7.78	18.84	10.29	19.04	24.26	22.59	33.09	39.53	32.35	0.80	1.08	1.42	0.86	0.48

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

\*\* As a percentage of loans with borrower income information available. No information was available for 1.73% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 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.

Institution ID: 10000017437 RIVERSIDE NATIONAL BANK OF FL

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

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002					Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Fort Pierce-Port St. Lucie MSA	1,315	50.85	18.18	13.72	19.05	24.80	23.65	28.17	39.12	33.31	4.47	7.08	5.39	4.61	3.55	
Melbourne-Titusville-Palm Bay MSA	638	24.67	17.64	12.78	19.92	22.01	24.18	25.08	38.26	40.13	1.87	2.43	2.14	1.58	1.81	
<b>Limited Review:</b>																
3 Adjacent Non-MSA Counties	335	12.95	15.02	3.74	17.91	11.53	23.21	26.17	43.85	58.57	3.26	3.10	2.29	3.83	3.30	
Lakeland-Winter Haven MSA	30	1.16	18.38	10.34	19.11	24.14	24.10	27.59	38.42	37.93	0.19	0.39	0.24	0.17	0.15	
Volusia County	121	4.68	17.46	13.16	20.36	21.05	24.08	29.82	38.10	35.96	0.36	0.57	0.40	0.45	0.24	
West Palm Beach MSA	147	5.68	18.84	5.63	19.04	19.01	22.59	23.94	39.53	51.41	0.14	0.15	0.12	0.13	0.15	

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

\*\* As a percentage of loans with borrower income information available. No information was available for 4.49% of loans originated and purchased by BANK.

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

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

Institution ID: 10000017437 RIVERSIDE NATIONAL BANK OF FL

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share *	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Fort Pierce-Port St. Lucie MSA	1,061	45.73	64.62	22.43	86.24	8.95	4.81	4.28	15.63
Melbourne-Titusville-Palm Bay MSA	438	18.88	65.73	25.80	78.31	12.79	8.90	1.98	6.31
<b>Limited Review:</b>									
3 Adjacent Non-MSA Counties	395	17.03	65.75	30.89	77.72	10.89	11.39	2.66	9.39
Lakeland-Winter Haven MSA	45	1.94	63.64	44.44	62.22	22.22	15.56	0.33	1.32
Volusia County	124	5.34	66.01	16.13	86.29	7.26	6.45	0.36	1.32
West Palm Beach MSA	257	11.08	62.74	38.13	77.43	12.45	10.12	0.22	0.66

\* Based on 2002 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 - 2003).

\*\*\*\* 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 60.73% of small loans to businesses originated and purchased by the bank.

Institution ID: 10000017437 RIVERSIDE NATIONAL BANK OF FL

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share *	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Fort Pierce-Port St. Lucie MSA	84	46.93	84.83	16.67	78.57	9.52	11.90	0.00	0.00
Melbourne-Titusville-Palm Bay MSA	12	6.70	92.82	41.67	83.33	8.33	8.33	0.00	0.00
<b>Limited Review:</b>									
3 Adjacent Non-MSA Counties	55	30.73	83.60	27.27	65.45	20.00	14.55	1.27	2.70
Lakeland-Winter Haven MSA	17	9.50	85.95	35.29	70.59	11.76	17.65	0.00	0.00
Volusia County	6	3.35	89.63	66.67	100.00	0.00	0.00	0.00	0.00
West Palm Beach MSA	5	2.79	83.58	40.00	80.00	20.00	0.00	0.00	0.00

\* Based on 2002 Peer Small Business Data: US and PR.

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2003).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 50.84% of small loans to farms originated and purchased by the bank.

Institution ID: 10000017437 RIVERSIDE NATIONAL BANK OF FL

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: FLORIDA									
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Fort Pierce-Port St. Lucie MSA	8	581	9	1,737	17	2,318	0.00	0	0
Melbourne-Titusville-Palm Bay MSA	5	138	6	1,859	11	1,997	0.00	0	0
<b>Limited Review:</b>									
3 Adjacent Non-MSA Counties	3	125	1	124	4	149	0.00	0	0
Lakeland-Winter Haven MSA	0	0	3	391	3	391	0.00	0	0
Volusia County	6	118	2	515	8	633	0.00	0	0
West Palm Beach MSA	8	584	2	440	10	1,024	0.00	0	0

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

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

Institution ID: 10000017437 RIVERSIDE NATIONAL BANK OF FL

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: FLORIDA																	
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002																	
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
<b>Full Review:</b>																	
Fort Pierce-Port St. Lucie MSA	52%	10	24%	0%	30%	50%	20%	2	0	0	0	+1	0	5.99	11.92	62.59	19.49
Melbourne-Titusville-Palm Bay MSA	21%	12	29%	0%	17%	50%	33%	4	0	0	0	+2	0	1.07	22.08	59.38	17.45
3 Adjacent Non-MSA Counties	12%	6	15%	0%	17%	50%	33%	3	0	0	+1	+1	0	0.00	7.26	4	25.33
Lakeland-Winter Haven MSA	4%	4	10%	0%	25%	50%	25%	4	0	0	+1	+2	0	0.75	16.85	67.94	14.46
Volusia County	7%	6	15%	0%	17%	83%	0%	4	0	0	+1	+3	0	3.40	14.05	70.79	11.76
West Palm Beach MSA	4%	3	7%	0%	33%	33%	34%	0	0	0	0	0	0	3.05	21.73	46.83	28.15