



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

Public Disclosure

**March 17, 2005**

Community Reinvestment Act  
**Performance Evaluation**

**Citrus Bank, National Association**  
**Charter Number: 21980**

**1717 Indian River Boulevard**  
**Vero Beach, FL 32961**

**Office of the Comptroller of the Currency**

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

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

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## Overall CRA Rating

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

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

Performance Levels	Citrus Bank, National Association 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:

- Overall, Citrus Bank's lending activity reflects adequate responsiveness to credit needs in its assessment areas taking into account the bank's business strategy, size, and resources.
- The overall geographic distribution of loans is adequate.
- The distribution of loans to businesses of different sizes is good.
- Overall, the bank has a good level of qualified investments that were adequately responsive to assessment area needs.
- Retail service delivery systems are reasonably accessible to geographies, businesses and individuals of different income levels throughout the bank's assessment areas.
- Overall, Citrus Bank provides a poor level of community development services in its assessment areas given the length of the evaluation period, available opportunities, and the bank's resources.

## Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an

employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

**Upper-Income:** Individual income that is 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

Citrus Bank, N.A. ("Citrus"), chartered in April 1990, is an intrastate commercial bank headquartered in Vero Beach, Florida. It is a wholly owned subsidiary of Citrus Financial Services, Inc. ("CFSI"). Neither the bank nor the holding company has any additional operating subsidiaries. In September 2001, CFSI and the bank were acquired by CIB Marine Bancshares, Inc. ("CIBM"). CIBM is a multi-bank holding company headquartered in Pewaukee, Wisconsin, which currently owns and operates three other separately chartered commercial banks and one federal savings bank. As of December 31, 2004, CIBM had total assets of \$1.383 billion. At the time of the acquisition, Citrus had total assets of approximately \$82 million and operated three full-service banking facilities, two in Indian River County and one in Brevard County.

As of December 31, 2004, Citrus had total assets of \$188 million. Deposits totaled \$170 million and the total loan portfolio, which represents 44% of total assets, was \$82 million. The loan-to-deposit ratio was 48% as of December 31, 2004. The bank is primarily a commercial business lender. Components of the bank's loan portfolio include commercial real estate loans (55%), residential real estate loans (22%), construction loans (13%), and commercial and industrial loans (10%). Prior to its acquisition by CIBM, the bank's business strategy also included residential mortgage lending. The current composition of the loan portfolio indicates some change in the bank's business strategy. At the last CRA examination, residential mortgage lending represented 38% of the bank's loan portfolio (as of March 31, 1999).

During the overall evaluation period, Citrus Bank was not profitable. As of December 31, 2004, the bank's Tier One Capital amounted to \$18 million. The bank is currently operating under a Formal Agreement. However, the Agreement does not impede the bank's local lending activities.

During the evaluation period, Citrus opened five branches, expanding its assessment area into Palm Beach (1) and Miami-Dade Counties (3) in the South, as well as Highlands County (1) in the West. The bank's primary business line is commercial lending both locally and in participation with its holding company affiliates. The bank offers a variety of business loan products, including the Small Business Administration ("SBA") 504 Loan Program. However, to date, the bank has had limited success in originating loans under this program. The bank also offers several consumer-loan products including home equity loans. During 2003 and 2004, Citrus did not originate residential mortgage loans in its assessment areas. However, early in 2005 the bank established a referral arrangement with a third party mortgage lender in order to provide this service on an indirect basis. A complete list of the bank's products and services can be found in the Public File.

There are no significant legal, financial or other factors impeding the bank's ability to help meet the credit needs of its assessment area during the evaluation period. The bank's rating at the last CRA examination dated June 7, 1999 was "**Satisfactory**", when the bank was evaluated as a small bank under the CRA. Because of the size of CIBM, Citrus is considered a large bank under the CRA at this examination. The bank generally operates independently of CIBM, but CIBM does provide compliance management assistance and assistance in meeting investment needs in the bank's assessment area.



## 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, small loans to businesses subject to filing under the CRA, consumer loans (at the request of the bank), and community development loans. We also evaluated community development investments, including affiliate activity, and community development services. The bank does not originate multi-family housing loans reportable under the UHMDA no small farm loans.

The overall evaluation period is from June 7, 1999, the date of the last CRA evaluation, through March 21, 2005. The bank was last evaluated using small bank procedures. Since then, the bank was acquired by a holding company with assets in excess of \$1 billion making the bank subject to large bank CRA examination procedures. The bank was first considered a large bank under the CRA and required to report small business/farm and community development loans in 2003. Therefore, there is a gap in loan data available for analysis. Other factors impacting the evaluation include the applicability of Census 2000 data, which became effective for CRA examination purposes for 2003 and the implementation of changes made by the Office of Management and Budget ("OMB") to Metropolitan Statistical Area ("MSA") designations, which became effective for 2004.

Because of the above factors, the overall evaluation period has been divided into three segments, each with its own applicable products, as follows:

January 1, 2000-December 31, 2002: HMDA loan data is evaluated for this period. Although the bank was a small bank under the CRA, it was subject to HMDA reporting, and HMDA loan data was available for analysis beginning with January 1, 2000. No small business loan data was available for that period. Any community development loans, qualified investments, or community development services initiated by the bank in this time period were also given consideration. Census 1990 data is used in the analysis during this time period.

January 1, 2003-December 31, 2003: The analysis of 2003 activity included originated small business loans, consumer loans, community development loans, qualified investments, and community development services. The bank did not originate HMDA loans in this time period. Census 2000 data is used in the analysis during this time period.

January 1, 2004-December 31, 2004: The analysis of 2004 activity included the same products as in 2003. Census 2000 data is used in the analysis. The new OMB MSA designations are used in this analysis therefore some assessment area definitions and demographics are different than those used in 2003. (See Selection of Areas for Full-Scope Review discussion below for additional details.)

Core tables for applicable products (see Appendix C) have been produced for each evaluation period. Table 15 – Distribution of Branch Delivery System & Branch Openings/Closings – was produced once for the overall evaluation period and is included with the tables for 2004.

## Data Integrity

This evaluation is based on accurate data. With the exception of HMDA loans, we tested the accuracy of the bank's data for 2000 through 2004 prior to the start of this CRA examination. The bank's internal testing of HMDA data was considered sufficient to verify that accurate data was being used at this examination.

A sample was drawn to determine the accuracy of data related to small loans to businesses and consumer loans. Consumer loan data was determined to be accurate but errors were noted for 2003 and 2004 small loans to businesses. However, the data was corrected and re-tested prior to being used at this examination. All community development loans, investments and services submitted by management were verified to ensure that they met the regulatory definition for community development. Some items submitted for consideration were excluded from this evaluation because they did not meet the definition or purpose of community development.

## Selection of Areas for Full-Scope Review

As previously discussed, changes in the bank's CRA status and MSA designations require multiple analysis. Each analysis has applicable assessment areas that have been used to determine areas used for full-scope and limited-scope reviews, as follows:

January 1, 2000-December 31, 2002: At this time, the bank had four assessment areas including: Non-MSA Indian River County, Non-MSA Highlands County, MSA 5000 (Miami-Dade, FL), and MSA 4900 (Melbourne-Titusville-Palm Bay, FL). Non-MSA Indian River County and MSA 5000 were chosen for full-scope reviews. These assessment areas represent 77% of the bank's deposits and 55% of lending activity analyzed for this evaluation period. A limited-scope review was conducted on the remaining assessment areas.

January 1, 2003-December 31, 2003: At this time, the bank had five assessment areas including: Non-MSA Indian River County, Non-MSA Highlands County, CMSA 56 (Miami-Ft. Lauderdale, FL), MSA 8960 (Palm Beach, FL), and MSA 4900 (Melbourne-Titusville-Palm Bay, FL). For purposes of analysis, the CMSA assessment area was divided into its two component MSAs--MSA 5000 (Miami-Dade, FL) and MSA 2860 (Ft. Lauderdale, FL). Non-MSA Indian River County and CMSA 56 (Miami-Ft. Lauderdale) were chosen for full-scope reviews. These assessment areas represented 73% of the bank's deposits and 91% of lending activity analyzed for this evaluation period. A limited-scope review was conducted on the remaining assessment areas.

January 1, 2004-December 31, 2004: At this time, the bank had four assessment areas including: MSA 46940 (Indian River, FL), non-MSA Highlands County, MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL), and MSA 37340 (Palm Bay, Melbourne-Titusville, FL). For analytical purposes, the MSA 33100 assessment area was divided into its three component Metropolitan Divisions ("MDs")--MD 33124 (Miami, FL), MD 22744 (Ft. Lauderdale, FL), and MD 48424 (Palm Beach, FL). MSA 46940 (Indian River, FL) and MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) were chosen for full-scope reviews. These assessment areas represent 76% of the bank's deposits and 94% of lending activity analyzed for this evaluation period. A limited-scope review was conducted on the remaining assessment areas.

## Ratings

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

Citrus'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 Indian River assessment area than the Miami-Ft-Lauderdale-Palm Beach assessment area. The Indian River assessment area was more heavily weighted because it contains the largest volume of the bank's deposits.

In 2004, conclusions for the Miami-Ft. Lauderdale-Palm Beach MSA are the consolidation of conclusions reached for each of the MDs that comprise the MSA. When consolidating MD conclusions, the most weight was given to Miami, since the vast majority of loans and deposits in the overall MSA are in the Miami portion of the MSA. In 2003, conclusions for the Miami-Ft. Lauderdale CMSA are the consolidation of conclusions reached for each MSA that comprises the CMSA. When consolidating MSA conclusions, the most weight was given to Miami since the vast majority of loans and deposits in the overall CMSA are in the Miami portion of the CMSA.

Lending was evaluated from 2000 through 2004. However, the most weight was given to activity in 2003 and 2004, when the bank was considered a large bank, under the CRA. The most weight was given to small loans to businesses since commercial lending is the bank's primary business strategy. Very limited consideration was given to consumer loans since the need for such lending is not as critical in the bank's assessment areas.

## Other

Community credit needs in the assessment areas were determined by reviewing recent housing and demographic information and community contacts conducted by the OCC in connection with other CRA examinations of banks operating in the same assessment areas. We conducted a community contact with the local office of a national organization whose mission is to construct housing that is affordable to very low-, low-, and moderate-income families.

The most critical identified credit need is financing for affordable single and multi-family housing units for low- and moderate-income residents. Loans for the rehabilitation of existing properties in poor neighborhoods are another identified need, particularly in the Miami-Ft. Lauderdale-Palm Beach assessment area. Also, there is a stated need to create jobs accessible to low- and moderate-income individuals through the creation or expansion of small businesses.

For additional information, see the market profiles of the full-scope assessment areas in Appendix B.

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

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

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Indian River assessment area is adequate and in the Miami-Ft. Lauderdale-Palm Beach MSA performance is also adequate. The greatest amount of weight was given to the Indian River assessment area. Among the bank's assessment areas, the Indian River assessment area has the largest portion of the bank's deposits.

### Lending Activity

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

Overall, Citrus Bank's, lending activity reflects adequate responsiveness to credit needs in its full-scope assessment areas after consideration was given to the bank's business strategy, its size, and resources. Lending activity reflects adequate responsiveness to the credit needs in the Indian River assessment area. Lending activity reflects adequate responsiveness to the credit needs in the Miami-Ft. Lauderdale-Palm Beach MSA assessment area, when considering the level of community development loans in the Miami portion of the assessment area.

This assessment is based primarily on business loans, which is the bank's primary business strategy. Consistent with this strategy, the bank originated no residential home purchase, refinance, or home improvement mortgage loans in its assessment areas in 2003 or 2004. Mortgage lending to finance affordable housing is a known need in the assessment area however there are a significant number of lenders in the assessment area that do originate such loans. The lack of residential mortgage lending had a neutral impact on the bank's lending activity performance.

#### Indian River Assessment Area

Citrus Bank's lending activity exhibits adequate responsiveness to credit needs in the Indian River assessment area during the overall evaluation period, taking into account the bank's business strategy, size, and resources.

During the January 1, 2000-December 31, 2002 evaluation period the bank originated a total of 10 residential mortgage loans, representing \$3.9 million. Consistent with its current business strategy, the bank originated no residential mortgage loans in the Indian River assessment area during the 2003 or 2004 evaluation periods.

The bank originated 19 small loans to businesses totaling \$2.2 million in 2003 and 13 such loans in 2004, totaling \$1.4 million. The bank also originated a total of 27 various types of consumer loans (\$486 thousand) during the 2003-2004 period, however they are not directly related to community credit needs. Consumer deposits secure a majority of the consumer

loans. No community development loans were originated during any portion of the evaluation period.

Reported small business lending activity is adequate, when the bank's deposit market share is compared with its small business loan market share in the Indian River assessment area. FDIC data as of June 30, 2004 shows that Citrus had a 2.79% deposit market share (\$86 million) in the Indian River assessment area. The bank was ranked 12<sup>th</sup> of the 18 financial institutions operating in Indian River County. Based on data reported to the FDIC as of June 30, 2003, the bank had a 4.58% deposit market share (\$101 million), and it ranked 9<sup>th</sup> of 18 financial institutions operating in Indian River County.

Using 2003 aggregate data (the most current available), Citrus's market share of small loans to businesses in the Indian River assessment area was .39%, which is significantly less than its deposit market share. The bank's small business ranking was 25<sup>th</sup> among 1,469 total reporters.

However, many of the small business loan reporters in the assessment area represent national credit card lenders that do not take deposits in the assessment area. Of financial institutions operating in the Indian River assessment area, Citrus had a market share of approximately 1.3% and ranked approximately 15<sup>th</sup>. Although this market share is also less than the bank's deposit market share it is more consistent. In the 2003 and 2004 evaluation periods, D&B data indicates that there are approximately 10,000 businesses located in Indian River County.

No market share data is available for consumer loans.

#### Miami-Ft. Lauderdale-Palm Beach Assessment Area

Lending activity performance in the Miami-Ft. Lauderdale-Palm Beach MSA exhibits adequate responsiveness to credit needs in the assessment area when taking into account the number and amount of loans originated in the assessment area, primarily in the Miami portion of the assessment area. Lending activity is adequate in the Miami portion of the assessment area, considering the level of community development loans. Lending activity is poor in the Palm Beach portion of the assessment area, and good in the Ft Lauderdale segment.

Overall, Citrus Bank's lending activity exhibits adequate responsiveness to credit needs in the Miami portion of the assessment area during the evaluation period. Even though small business lending demonstrates poor responsiveness to assessment area needs, the volume of community development lending in the assessment area had a positive impact on the lending activity conclusion.

Consistent with its business strategy, the bank originated no residential mortgage loans in the Miami portion of the assessment area during 2003 or 2004. Earlier in the evaluation period, the bank originated one residential mortgage loan in 2002. (The bank did not operate in the Miami portion of the assessment area until December 2001.) For the 2003 and 2004 evaluation periods, the bank originated 10 small loans to business (\$2.8 million) in 2003 and 11 such loans in 2004 totaling \$2 million. Also, 11 consumer loans of various types and totaling \$808 thousand were originated in the Miami portion of the assessment area during 2003 and 2004, combined. However, they are not directly related to community credit needs.

During the overall evaluation period, Citrus Bank originated four community development loans totaling \$9.6 million, that directly benefited the Miami portion of the assessment area and that were adequately responsive to assessment area needs. Another community development loan totaling \$1 million that can benefit the entire MSA assessment area also was given positive consideration. (See discussion of Community Development Loans for details.)

Small business lending activity is poor in the Miami-Ft. Lauderdale-Palm Beach assessment area when the bank's deposit market share is compared with its loan market share, even when consideration is given to the size of the bank and the amount of time the bank has operated in the assessment area. Based on data reported to the FDIC as of June 30, 2004, Citrus had a deposit market share of .05% in the Miami portion of the assessment area, with total deposits of \$32 million. The bank was ranked 72<sup>nd</sup> of 78 banks operating in the Miami portion of the assessment area. As of June 30, 2003, the bank had the same ranking, but its deposit market share was .04%.

Using 2003 aggregate data (the most current available), Citrus's market share of small loans to businesses in the Miami portion of the assessment area was infinitesimal and its market rank was 1,908 out of 1,961 reporters. The market for small loans to businesses in the Miami portion of the assessment area is highly competitive. In addition to all the banks operating in the assessment area, a large number of national credit card lenders also report small business loan activity. Even taking this level of competition into consideration, the bank's market share is considered weak. According to D&B data, approximately 200,000 businesses operated in the Miami portion of the assessment area in both 2003 and 2004.

No market share data is available for consumer loans.

Lending activity in the Palm Beach portion of the assessment area is poor when taking into account the number and amount of loans originated in the assessment area and giving consideration to the limited time the bank has been operating in the assessment area (since April 2003). Based on FDIC data as of June 30, 2004, Citrus had a deposit market share of .02% in the Palm Beach portion of the assessment area, with total deposits of \$6.5 million. The bank was ranked 58<sup>th</sup> of 62 institutions operating in the Palm Beach portion of the assessment area.

In 2003, the bank originated 4 loans to small businesses totaling \$1.7 million in the Palm Beach portion of the assessment area. It did not originate any loans to small businesses in 2004. The bank did not originate any community development loans for the period 2003 or 2004 that would directly benefit the Palm Beach portion of the assessment area. Consistent with the bank's business strategy it did not originate any HMDA-reportable residential mortgage loans. Three consumer loans totaling \$3.6 million (including a \$1.8 million home equity loan) were originated for the years 2003 and 2004, combined. For the period 2000-2002, Palm Beach County was not part of the bank's assessment area. Because of this, a comparison of deposit market share and loan market share for small loans to businesses is not meaningful. No market share data is available for consumer loans.

Lending activity in the Ft. Lauderdale portion of the MSA assessment area is good considering that the bank does not operate a branch there. In 2003, the bank originated 2 loans to small business totaling \$880 thousand. In 2004, it originated 4 such loans totaling \$1 million. In December 2004, the bank executed a legally binding commitment for an affordable housing

community development loan totaling \$2 million that will benefit the Ft. Lauderdale portion of the assessment area. The loan has not yet closed. (See discussion of community development loans for details.)

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

The geographic distribution of loans is adequate, based on small business loan performance. Geographic distribution is adequate in the Indian River assessment area. Geographic distribution is poor in the Miami-Ft. Lauderdale-Palm Beach assessment area. A geographic distribution analysis was not conducted for home mortgage loans because of the minimal number of loans and opportunities in low- and moderate-income geographies. The geographic distribution of small loans to businesses is adequate. The geographic distribution of consumer loans is poor.

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

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

It was not meaningful to conduct a geographic distribution analysis of home mortgage loans. Home mortgage lending activity occurred only in the January 1, 2000 to December 31, 2002 evaluation period. Lending levels are not sufficient enough for analysis. During that evaluation period, 11 loans were originated in the Indian River assessment area and one in the Miami area.

In addition to insufficient loan volume, the Indian River assessment area did not provide sufficient opportunity to originate home mortgage loans in low- and moderate-income geographies in the Indian River assessment area. Based on the 1990 Census, there were no low-income geographies in the Indian River assessment area. The assessment area did contain one moderate-income geography, but it had only 794 owner-occupied housing units, providing minimal opportunity for home mortgage lending.

### ***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.

Small business loan activity occurred in the 2003 and 2004 evaluation periods. Overall, the geographic distribution of small loans to businesses is adequate. Performance in the Indian River assessment area is adequate. Performance in the Miami-Ft. Lauderdale-Palm Beach assessment area is poor.

### **Indian River Assessment Area**

Overall, the geographic distribution of small loans to businesses is adequate in the Indian River assessment area, given available opportunities.



In 2003, it was not meaningful to conduct a geographic distribution analysis of small loans to businesses, as the assessment area did not provide sufficient opportunities for such lending in low- and moderate-income geographies. Based on the 1990 Census, there were no low-income geographies in the assessment area. There was one moderate-income geography in the assessment area, but it contained only 173 businesses, providing minimal opportunity for lending to businesses.

In 2004 the geographic distribution of small loans to businesses is adequate. There are no low-income geographies in the Indian River assessment area, but there are four moderate-income geographies, containing approximately 1,529 businesses. In the moderate-income geographies, the level of Citrus's loans to small businesses is somewhat lower than the level of businesses located in those geographies. Market share data is not yet available for 2004.

### Miami-Ft. Lauderdale-Palm Beach Assessment Area

Overall, the geographic distribution of small loans to businesses is poor in the Miami-Ft. Lauderdale-Palm Beach assessment area, based on performance in the Miami portion of the assessment area. The limited number of small loans to businesses in the Ft. Lauderdale and Palm Beach County portions of the assessment area precluded any form of meaningful analysis.

In 2003, the geographic distribution of small loans to businesses is adequate. The bank originated no loans to small businesses in the low-income geographies of the Miami portion of the assessment area. In the moderate-income geographies, the level of the bank's loans was near to the level of businesses located in moderate-income geographies. The bank's market share in moderate-income geographies exceeded its overall market share.

In 2004, the geographic distribution of small loans to businesses is very poor. The bank originated no loans to small businesses in the low-income geographies of the Miami portion of the assessment area. In the moderate-income geographies, the level of the bank's loans is significantly lower than the level of businesses located in moderate-income geographies. No market share data is available for 2004.

### **Consumer Loans**

Refer to Table 13 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Consumer loan activity occurred in the 2003 and 2004 evaluation periods. Lending activity was low during these periods therefore conclusions reached here do not carry significant weight in reaching conclusions about the bank's overall performance.

Overall, the geographic distribution of consumer loans is poor. The geographic distribution of consumer loans is poor in the Indian River assessment area. The geographic distribution of consumer loans is poor in the Miami-Ft. Lauderdale-Palm Beach assessment area.

### Indian River Assessment Area

Overall, the geographic distribution of consumer loans is poor in the Indian River assessment area.

In 2003, the geographic distribution of consumer loans is very poor. None of the bank's consumer loans were to low- or moderate-income borrowers.

In 2004, the geographic distribution of consumer loans is adequate. None of the bank's consumer loans were to low-income borrowers in the Indian River assessment area. The level of consumer loans to moderate-income borrowers exceeded the level of moderate-income households in the assessment area.

### Miami-Ft. Lauderdale-Palm Beach Assessment Area

Overall, the geographic distribution of consumer loans is poor in the Miami-Ft. Lauderdale-Palm Beach assessment area, based on performance in the Miami portion of the assessment area. The limited number of consumer loans in the Ft. Lauderdale and Palm Beach County portions of the assessment area precluded any form of meaningful analysis.

In 2003, the geographic distribution of consumer loans is very poor. None of the bank's consumer loans were to low- or moderate-income borrowers.

In 2004, the geographic distribution of consumer loans is poor. None of the bank's consumer loans were to low-income borrowers in the Miami portion of the assessment area. The level of consumer loans to moderate-income borrowers was somewhat lower than the level of moderate-income households in the assessment area.

## **Lending Gap Analysis**

No unexplained, conspicuous gaps in lending were identified. We reviewed lending reports detailing the volume of small loans to businesses in low- and moderate-income geographies. The lack of lending throughout the bank's assessment areas, particularly in the Miami-Ft. Lauderdale-Palm Beach assessment area, is reflective of the bank's very limited presence and the large size of the assessment area.

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

A majority of the bank's loan originations is within its defined assessment area. Overall, 85% by number and 83% by dollar of Citrus Bank's loan originations are within its assessment area. By loan products, 88% by number and 87% by dollar of HMDA loans, 86% by number and 79% by dollar of small loans to businesses, and 82% by number and 94% by dollar of consumer loans are inside the bank's assessment area.

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

Based on small business loan performance, the borrower distribution of loans is good when compared with assessment area demographics. Borrower distribution is good in the Indian River assessment area, based on small business loan performance. Borrower distribution is

excellent in the Miami-Ft. Lauderdale-Palm Beach assessment area. A borrower distribution analysis was not conducted for home mortgage loans because of the minimal number of loans. The distribution of small loans to businesses is good. The borrower distribution of consumer loans is poor

### ***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.

It was not meaningful to conduct a borrower distribution analysis of home mortgage loans. Home mortgage lending activity occurred only in the January 1, 2000 to December 31, 2002 evaluation period. Lending levels are not sufficient enough for analysis. During that time, 11 loans were originated in the Indian River assessment area and one in the Miami area.

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

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

Small business loan activity occurred in the 2003 and 2004 evaluation periods. Overall, the distribution of small loans to businesses is good. Performance in the Indian River assessment area is good and performance in the Miami-Ft. Lauderdale-Palm Beach assessment area is excellent when compared with area demographics.

#### **Indian River Assessment Area**

Overall, the distribution of small loans to businesses is good in the Indian River assessment area.

In 2003, the distribution of small loans to businesses is excellent. The bank's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) exceeds the percentage of small businesses in the assessment area. The bank's market share of small loans to small businesses exceeds its overall market share of small loans to all businesses.

In 2004, the distribution of small loans to businesses is adequate. The bank's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) is somewhat lower than the percentage of small businesses in the assessment area. No market share data is available for 2004.

#### **Miami-Ft. Lauderdale-Palm Beach Assessment Area**

Overall, the distribution of small loans to businesses is excellent in the Miami-Ft. Lauderdale-Palm Beach assessment area, based on performance in the Miami portion of the assessment area. The limited number of consumer loans in the Ft. Lauderdale and Palm Beach County portions of the assessment area precluded any form of meaningful analysis.

In 2003 and 2004, the distribution of small loans to businesses is excellent. The bank's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) exceeds the percentage of small businesses in the assessment area. In 2003, the bank's market share of small loans to small businesses exceeds its overall market share of small loans to all businesses. Market share data is not yet available for 2004.

### ***Consumer Loans***

Refer to Table 13 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

Consumer loan activity occurred in the 2003 and 2004 evaluation periods. Lending activity was low during these periods therefore conclusions reached here do not carry any weight in reaching conclusions about the bank's overall performance.

Overall, the borrower distribution of consumer loans is poor. The borrower distribution of consumer loans is poor in the Indian River assessment area. The borrower distribution of consumer loans is very poor in the Miami-Ft. Lauderdale-Palm Beach assessment area.

#### Indian River Assessment Area

Overall, the borrower distribution of consumer loans is poor in the Indian River assessment area.

In 2003, the borrower distribution of consumer loans is adequate. Lending to low-income borrowers is very poor. The bank did not originate any consumer loans to low-income borrowers. Lending to moderate-income borrowers is good. The level of consumer loans to moderate-income borrowers exceeds the level of moderate-income households in the assessment area.

In 2004, the borrower distribution of consumer loans is poor. Lending to low-income borrowers is very poor. The bank did not originate any consumer loans to low-income borrowers. Lending to moderate-income borrowers is poor. The level of consumer loans to moderate-income borrowers is lower than the level of moderate-income households in the assessment area.

#### Miami-Ft. Lauderdale-Palm Beach Assessment Area

Overall, the borrower distribution of consumer loans is very poor in the Miami-Ft. Lauderdale-Palm Beach assessment area, based on performance in the Miami portion of the assessment area. The limited number of consumer loans in the Ft. Lauderdale and Palm Beach County portions of the assessment area precluded any form of meaningful analysis.

In 2003 and 2004, the borrower distribution of consumer loans is very poor. The bank did not originate any consumer loans to low- or moderate-income borrowers in either year.

## 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.

Overall, community development lending had a neutral impact on the Lending Test.

### Indian River Assessment Area

During the overall evaluation period, the bank did not originate any community development loans in the Indian River assessment area. This had a neutral impact on Lending Test conclusions for the Indian River assessment area.

### Miami-Ft. Lauderdale-Palm Beach Assessment Area

Considering the volume of community development lending and the level of responsiveness to assessment area needs, community development lending had a positive impact on Lending Test in the Miami-Ft. Lauderdale-Palm Beach assessment area.

During the overall examination period, the bank originated one community development loan totaling \$1 million that benefited the entire South Florida Region including Miami-Dade, Broward (Ft. Lauderdale), and Palm Beach Counties. The loan is to an experienced CDC/CDFI that helps to finance affordable housing construction in the Region. Affordable housing is a critical need in the assessment area. The loan is very responsive to assessment area needs. The projects, which are directed to very-low, low-, and moderate-income persons, generally take advantage of Low-Income Housing Tax Credits in order to make the various units affordable. To date, the majority of the CDCs activities have been in the Miami area.

In the Miami portion of the assessment area, the bank originated four community development loans totaling \$9.6 million during the evaluation period. Of that total, \$2.2 million was participated to other financial institutions not affiliated with the bank. Two of the bank's loans (\$3.2 million) helped to provide 35 owner-occupied studio condominium units affordable to moderate-income persons and were adequately responsive to community credit needs.

Two other loans, totaling \$6.3 million, helped to revitalize and stabilize two different redevelopment areas in the Miami portion of the assessment area. One loan was to finance the acquisition of property in the Little Havana Empowerment Zone. The property, also located in a "Model City" district, will be used in the construction of new market-priced housing units with the stated goal of bringing residents back to older urban communities in order to stabilize those communities. The loan adequately meets community development needs in the assessment area.

The final loan helped to finance redevelopment efforts along the waterfront in downtown Miami. The project was part of a city redevelopment plan to reestablish a commercial area by bringing in new businesses and jobs. Although not located in a low- or moderate-income geography, the redevelopment area is adjacent to such areas and is expected to provide approximately 100 jobs in the marinas, shops and restaurants that are established. The

majority of these jobs will be for low- and moderate-income people and the loan has a good level of responsiveness to community needs.

During the evaluation period the bank issued a legally binding commitment to an affordable housing developer in the Ft. Lauderdale portion of the assessment area. Totalling \$2 million, the loan will provide for the construction of 50 units of housing affordable to low- and moderate-income persons, and is very responsive to critical needs in the assessment area. Affordable housing subsidies will be available to purchasers to ensure affordability. The project also includes assistance from the City of Pompano Beach and the Florida Housing Finance Corporation. At the time of this evaluation, the loan had not yet closed.

### **Product Innovation and Flexibility**

Product innovation and flexibility had a neutral impact on the Lending Test conclusions. The bank did not use innovative or flexible lending products during the evaluation period.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Non-MSA Highlands County and Palm Bay-Melbourne-Titusville MSA assessment area is inconsistent with the bank's overall "Low Satisfactory" performance under the Lending Test. The bank's performance in each of the two limited-scope assessment areas was weaker than the bank's overall Lending Test performance.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test is rated "High Satisfactory." Based on a full-scope review, the bank's performance in the Indian River assessment area is adequate, given the level of opportunities and the bank's resources. Based on a full-scope review, performance in the Miami-Ft. Lauderdale-Palm Beach MSA assessment area is excellent, given the impact of regional investments. Investments in this assessment area were adequately responsive to assessment area credit needs. The bank's strong performance in the limited-scope Palm Bay-Melbourne-Titusville MSA assessment area had a positive impact on the Investment Test rating.

The majority (62%) of the bank's investments during the overall evaluation period are mortgage-backed securities, for which the collateral is mortgage loans to low- and moderate-income borrowers. Mortgage-backed securities are important because they provide needed liquidity to lending institutions so that additional mortgages can be funded. The bank's holding company purchases mortgage-backed securities then allocates portions of the securities to its affiliate banks, based on the location of the mortgages. At Citrus, each of the mortgage-backed security allocations is for pools of loans to primarily low- and moderate-income borrowers in the bank's Florida assessment areas. These loan pools are presented on the Investment Tables (#14) as "Regional" investments because they benefit multiple assessment

areas. For the overall evaluation period, the regional mortgage-backed security loan polls total \$3.5 million. These mortgage-backed securities are reasonably responsive to assessment area credit needs.

Overall, the bank's community development investments are adequately responsive to assessment areas needs, primarily addressing the need for affordable housing. Affordable housing needs are considered critical throughout the bank's assessment areas. Investments made during the evaluation period are not considered innovative or complex. Private investors routinely provide these types of qualified investments. For a discussion of investment opportunities, see the Market Profiles in Appendix B.

Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments. All investments have occurred during the current evaluation period. There are no prior period investments. At its last examination, the bank was evaluated under Small Bank CRA and was not subject to the Investment Test.

### Indian River Assessment Area

Given the level of opportunities and the bank's presence in the assessment area, investment in the Indian River assessment area is adequate, considering the impact of regional investments (mortgage-backed securities). The bank made one direct investment in a minority-owned Small Business Investment Company ("SBIC") that serves Indian River and surrounding Counties. This investment is responsive to assessment areas and will help to enhance economic development efforts in the assessment area. The bank had this investment throughout the evaluation period and allocated it to Indian River County.

Also, approximately 6% of the regional mortgage-backed securities discussed above benefit the Indian River assessment area. This investment is adequately responsive to assessment area needs.

### Miami-Ft. Lauderdale-Palm Beach Assessment Area

Investment performance is considered excellent in the Miami-Ft. Lauderdale-Palm Beach assessment area, when consideration is given to regional investments. These investments are adequately responsive to assessment area credit needs.

There are no direct investments in the Miami-Ft. Lauderdale-Palm Beach MSA assessment area. However, this assessment area benefits from several regional investments. The bank made an investment totaling \$100,000 in a community development corporation ("CDC") that finances the construction of rental and owner-occupied housing that is affordable to very low-, low- and moderate-income people. The CDC serves all of the three counties in the assessment area but, to date, most of the activity has been in Miami-Dade County. This investment is very responsive to critical assessment area needs.

In addition, approximately \$3 million (86%) of the regional mortgage-backed securities investments previously discussed benefit the Miami-Ft. Lauderdale-Palm Beach assessment area.

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

Since most of the weight is placed on the Indian River assessment area in the analysis, the strong performance in the Palm Bay-Melbourne-Titusville limited scope assessment area had a positive impact on the overall Investment Test rating, raising it to “High Satisfactory”. Therefore, performance in the Palm Bay-Melbourne-Titusville MSA is not inconsistent with the bank’s “High Satisfactory” rating.

Based on a limited-scope review, the bank’s performance under the Investment Test in the Non-MSA Highlands County assessment area is weaker than the bank’s overall “High Satisfactory” performance. This performance had no impact on the overall Investment Test 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 in both the Indian River and Miami-Ft. Lauderdale-Palm Beach assessment areas is adequate, given the bank’s business strategy.

### **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.

Citrus Bank’s delivery systems are reasonably accessible to geographies, businesses, and individuals of different income levels throughout the full-scope assessment areas. Accessibility is adequate in the Indian River assessment area. The bank has no branches in low- or moderate-income census tracts in the Indian River assessment area. However, the Indian River assessment area has no low-income census tracts. The bank’s two offices, located in middle-income census tracts in Vero Beach and Sebastian, are situated in commercial areas on major thoroughfares, used by commuters and shoppers of all income levels. The Vero Beach branch is directly adjacent to moderate-income census tracts in the West and the South. The bank’s business strategy is primarily directed toward business entities.

The bank has a total of four branches in the Miami-Ft. Lauderdale-Palm Beach MSA assessment area. Three offices (North Miami, Biscayne Blvd, and Coral Gables) are located in the Miami portion of the assessment area and one (Boca Raton) is in the Palm Beach portion. There are no offices in the Ft. Lauderdale portion of the assessment area, but the North Miami branch is reasonably close and provides banking services to Broward County businesses and residents.

Overall, accessibility is adequate in the Miami-Ft. Lauderdale-Palm Beach MSA. Accessibility is adequate in the Miami and Palm Beach portions of the assessment area. There are no Citrus Bank offices in the low- or moderate-income census tracts of the Miami-Ft. Lauderdale-



Palm Beach assessment area. Two of the bank's offices (North Miami and Coral Gables) are, however, adjacent to moderate-income census tracts. The office in the Palm Beach portion of the assessment area is located in a middle-income census tract. All of the offices in the MSA are located on major commercial highways or thoroughfares used by commuters and shoppers of all income levels. The bank's business strategy is primarily directed toward business entities.

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. All of the branches in the Miami-Ft. Lauderdale-Palm Beach MSA were opened during the evaluation period, none in low- or moderate-income geographies. No branches were closed during the evaluation period.

Alternative delivery systems in the full-scope assessment areas are limited. They include such things as telephone and on-line banking as well as ATM and debit cards. The bank has an ATM machine at one branch in the Indian River assessment area. None of the branches in the Miami-Ft. Lauderdale- Palm Beach MSA assessment area have ATM machines. To the extent they are available, there is no evidence to indicate that the bank's alternative delivery systems materially improve access among low- and moderate-income individuals or geographies.

Citrus offers a variety of banking products and services in its assessment areas, including a no-fee checking account with a nominal opening balance. The bank's products and services, including business hours, do not vary in a way that inconveniences low- and moderate-income geographies or individuals. A complete list of products, services, and branch operating hours is available in the bank's Public File.

## **Community Development Services**

Overall, the bank's performance in providing community development services in the full-scope assessment areas is poor, given the length of the evaluation period, available opportunities, and the bank's resources. Performance is poor in the Indian River assessment area and good in the Miami-Ft. Lauderdale-Palm Beach assessment area.

In the Indian River assessment area, Citrus Bank's directors, officers, and employees provided a limited level of community development services in the assessment area, given the length of the evaluation period and the level of opportunities. In 2005, a bank officer joined the Economic Development Committee of the Indian River Chamber of Commerce. The stated goal of the committee is to encourage businesses that meet the definition of small businesses under the CRA to locate in the county and provide needed jobs. This committee operates in conjunction with the county and Private Industry Partners.

Considering the level of the bank's presence, the level of community development services provided by Citrus Bank in the Miami-Ft. Lauderdale-Palm Beach assessment area is good. During the 2003 and 2004 evaluation periods, a bank officer served on the loan committee of a CDC that provides financing for the construction of housing affordable to very low- low- and moderate-income persons throughout the MSA assessment area. In the Miami portion of the assessment area, two employees used their financial expertise and provided technical support to help develop a project that will help low- and moderate-income individuals apply for benefits and other forms of financial assistance.

In the Ft. Lauderdale portion of the assessment area, a bank officer is working with an affordable housing developer to provide a financial literacy program that will allow purchasers of new affordable housing units to qualify for certain special mortgage loan programs. In addition to preparing the training materials, the officer and other employees will act as volunteer trainers when the classes begin later in 2005.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Non-MSA Highlands County and is not inconsistent with the bank's overall "Low Satisfactory" performance. Performance in the Palm Bay-Melbourne-Titusville MSA assessment area is stronger than the bank's overall "Low Satisfactory" performance.

## 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 (excluding CD Loans): 1/1/2000 to 12/31/2004 Investment and Service Tests and CD Loans: 6/7/1999 to 3/21/2005	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Citrus Bank N.A. Vero Beach, Florida	Residential Mortgage Loans Small Loans to Businesses Consumer Loans Community Development Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
CIB Marine Bancshares, Inc	Holding Company	Investments
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
MSA 46940 (Indian River, FL)	Full-Scope	NA
MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL)	Full-Scope	
Non-MSA Highlands County	Limited Scope	
MSA 37340 (Palm Bay-Titusville-Melbourne, FL)	Limited Scope	

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

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

Indian River MSA	B-2
Miami, Ft. Lauderdale and Palm Beach MSA	B-4

**INDIAN RIVER ASSESSMENT AREA  
(MSA 46940)**

Demographic Information for Full-Scope Area: MSA 46940 Indian River County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.00	17.39	56.52	26.09	0.00
Population by Geography	112,947	0.00	16.49	61.66	21.84	0.00
Owner-Occupied Housing by Geography	38,119	0.00	13.47	61.60	24.93	0.00
Business by Geography	10,409	0.00	14.69	57.60	27.71	0.00
Farms by Geography	557	0.00	14.36	65.89	19.75	0.00
Family Distribution by Income Level	32,901	17.61	19.63	22.39	40.37	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	12,252	0.00	22.26	66.07	11.67	0.00
Median Family Income		46,603	Median Housing Value		129,634	
HUD Adjusted Median Family Income for 2004		52,900	Unemployment Rate (2000 US Census)		1.89%	
Households Below Poverty Level		8.49%				

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

Source: 2000 US Census and 2004 HUD updated MFI

The bank’s assessment area consists of all of MSA 46940, which consists of all of Indian River County. The assessment area meets the requirements of the CRA regulation and does not arbitrarily exclude low- and moderate-income geographies. Indian River County was designated an MSA in 2004. Prior to that, the county was considered a non-metropolitan statistical area because of its lower population level.

According to the 2000 Census, the total population of the assessment area is approximately 113 thousand, a 25% increase from the 1990 Census. The increase is a result of an influx of people relocating from northern cities in the United States, as well as more southern portions of Florida where housing costs and population levels are higher. This influx caused an expansion of housing, increasing the number of owner-occupied housing units to approximately 38 thousand, a 36% increase.

The assessment area is now made up of 23 census tracts, the majority of which are middle-income. There are no low-income census tracts and only four moderate-income census tracts, limiting the opportunity to lend in low- and moderate-income areas.

Based on the 2000 Census, the median housing value in Indian River County is \$130 thousand. However, since 2002, housing prices in central and south Florida have increased significantly, in excess of 25% annually. Our review of current housing prices indicates that the cost of a home in Indian River County has increased, with the median price of an existing home being closer to \$200. New home prices are much higher and the county and local community organizations are becoming increasingly concerned about the availability of affordable housing.

The local economy is based on tourism, as well as agriculture and light industry. Service oriented businesses are the top employers of the workforce and provide support to the tourism industry as well as health related services for the large and aging retirement population. Agriculture remains an important component of the economy. The Hurricanes that struck the area in September 2004, caused severe damage to crops and businesses, as well as many homes.

Banking is competitive in Indian River County. FDIC data as of June 30, 2004 showed 18 offices of community, as well as national and regional banks operating in the County. Citrus is headquartered in Indian River County.

Opportunities are available for community development lending, investments, and services throughout the Indian River assessment area. Community development opportunities include working with and providing financing to organizations whose mission is to provide affordable housing and/or community services for low- and moderate-income persons, as well as organizations with a mission of economic development. Types of community development investments available in the assessment area include, but are not limited to, affordable housing bonds, participation in local Community Development Corporations (CDCs”) and Community Development Financial Institutions (“CDFIs”), many of which focus on work force development programs targeted to low- and moderate-income residents, and opportunities to contribute to numerous qualified non-profit organizations whose missions are focused on providing affordable housing, community services for low- and moderate-income persons, and economic development.

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

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

Overall, the MSA has a total population of approximately 5 million people, with the largest concentration of population in the Miami portion of the MSA. According to 2004 designations, each of the counties in the assessment area is designated as a Metropolitan Division (“MD”). Each MD is briefly discussed below and the accompanying table provides specific demographic information about the individual MD.

MIAMI MD

Demographic Information for Full- Scope Area: MD 33124 (Miami-Dade, FL)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	347	7.78	28.53	32.85	29.97	0.86
Population by Geography	2,253,362	4.89	28.61	35.68	30.79	0.02
Owner-Occupied Housing by Geography	449,333	1.69	19.82	36.99	41.51	0.00
Business by Geography	209,400	5.27	22.49	32.39	39.42	0.43
Farms by Geography	2,649	2.15	17.70	33.26	46.77	0.11
Family Distribution by Income Level	552,484	23.00	16.98	18.53	41.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	220,856	8.31	40.20	35.41	16.08	0.00
Median Family Income		40,266	Median Housing Value		123,974	
HUD Adjusted Median Family Income for 2004		45,700	Unemployment Rate (2000 US Census)		3.92%	
Households Below Poverty Level		18.08%				

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

Source: 2000 US Census and 2004 HUD updated MFI

The Miami MD is a densely populated urban center. According to the 2000 Census, the total population is approximately 2.3 million people, residing in a nearly 2 thousand square mile area. Between the 1990 and 2000 Census, the population increased 16.3 %. The increase is a result of an influx of immigrants from Latin America and the Caribbean, as well as relocation from northern cities in the United States.

The City of Miami, located entirely in the Miami MD, represents approximately 20 percent of the MD population and 28 percent of the MD’s census tracts. However, a disproportionately large portion of the City is categorized as low- and moderate-income with approximately 60 percent of the MD’s low- and moderate-income census tracts being located in the City. Based

on the 2000 Census, the City of Miami is considered to be the poorest large city in the United States. Eighteen percent of the population lives below the poverty level.

Housing costs are high. As of February 2005, the Florida Association of Realtors estimated the median sales price of an existing single-family home in the Miami MD area to be \$310,000. At the same time in 2004, the median price was \$232,000. When compared with a HUD Adjusted Median Family Income of \$45,700 for 2004 it is clear that the unsubsidized purchase of an average single-family residence would be beyond the financial means of many individuals classified as low- and moderate-income.

The MD's economy is diverse. Major industries include real estate development, trade businesses with Latin America, tourism and banking. The proximity of the Caribbean, Central and South America plus superior seaport and airport capabilities provide this area with a distinct advantage as a global trading center. There are many service businesses in the area and in the extreme southern portion of the MD agriculture is a major industry (e.g. tomatoes, citrus, and other vegetables).

Banking competition is intense. FDIC data as of June 30, 2004 showed 78 institutions operating 572 banking offices of national, regional, and community banks in the Miami MD.

There are a wide range of opportunities for community development lending, investments, and services throughout the Miami MD. However, larger institutions in the MSA are quite competitive for the qualified investments that are available. Community development opportunities include working with and providing financing to the numerous organizations whose mission is to provide affordable housing and/or community services for low- and moderate-income persons, as well as organizations with a mission of economic development. There is a federally designated Enterprise Zone that targets economic development with the goal of stimulating and retaining jobs. There are 20 areas designated as Targeted Urban Areas ("TAU") that are the focus for the Urban Economic Revitalization Plan for Miami-Dade County. Types of community development investments available in the MD include, but are not limited to, tax credit purchases for low- and moderate-income housing, participation in numerous local Community Development Corporations (CDCs") and Community Development Financial Institutions ("CDFIs") and opportunities to contribute to qualified non-profit organizations whose missions are focused on providing affordable housing, community services for low- and moderate-income persons, and economic development.



Ft Lauderdale MD

Demographic Information for Full Scope Area: MD 22744 Ft Lauderdale						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	279	4.66	25.45	41.94	27.96	0.00
Population by Geography	1,623,018	3.57	26.43	43.13	26.88	0.00
Owner-Occupied Housing by Geography	454,625	1.16	23.67	45.93	29.24	0.00
Business by Geography	159,905	5.05	23.05	44.09	27.81	0.00
Farms by Geography	2,654	3.28	23.89	44.72	28.11	0.00
Family Distribution by Income Level	413,958	20.85	18.17	20.48	40.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	161,511	5.81	38.36	42.71	13.12	0.00
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below Poverty Level		50,570 57,400 10.79%	Median Housing Value Unemployment Rate (2000 US Census)		115,192 2.64%	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2000 US Census and 2004 HUD updated MFI

Although less of an urban area than the Miami MD, the Ft. Lauderdale MD is also densely populated. According to the 2000 Census, the total population is approximately 1.6 million, a 29% increase since the 1990 Census. Income levels are much higher in the Ft. Lauderdale MD, when compared with Miami. The HUD adjusted median family income for 2004 is \$57,400 in Ft. Lauderdale in comparison to \$45,700 in the Miami MD. The level of families below the poverty level is also smaller in Ft. Lauderdale, when compared with Miami. In Ft. Lauderdale 10.79% of the population is below the poverty level while 18.08% of the population in the Miami MD is below the poverty level.

Housing costs are very high in the Ft. Lauderdale MD. According to the Florida Association of Realtors, in February 2005, the median price of an existing single-family home in Broward County was \$319,400, a 32% increase from the prior year. Realtors indicate that the price increases are due to a declining supply of homes and the increasing population. There is little space remaining in Broward County for new housing construction on a large scale. This situation results in a strong need for affordable housing in the Ft. Lauderdale MD.

The economy in the area is strong. Major industries include real estate development, tourism, and the service industry, particularly as related to health care. The banking industry in the Ft. Lauderdale MD is competitive. As of June 30, 2004 FDIC data showed 54 institutions operating 426 offices in the Ft. Lauderdale MD. These institutions include national, regional, and community banks headquartered in the area.

There are opportunities for community development lending, investments, and services throughout the Ft. Lauderdale MD. Community development opportunities include working with and providing financing to organizations whose mission is to provide affordable housing and/or community services for low- and moderate-income persons, as well as organizations with a mission of economic development. Types of community development investments available in the MD include, but are not limited to, tax credit purchases for low- and moderate-income housing, participation in local Community Development Corporations (CDCs”) and Community Development Financial Institutions (“CDFIs”) and opportunities to contribute to numerous qualified non-profit organizations whose missions are focused on providing affordable housing, community services for low- and moderate-income persons, and economic development.

Palm Beach MD

Demographic Information for Limited Scope Area: MD 48424 Palm Beach						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	265	5.66	26.42	33.58	33.58	0.75
Population by Geography	1,131,184	4.21	29.32	33.88	32.37	0.21
Owner-Occupied Housing by Geography	354,024	1.53	24.63	36.35	37.50	0.00
Business by Geography	117,522	3.91	23.48	33.84	38.63	0.13
Farms by Geography	3,145	4.77	23.37	37.07	34.79	0.00
Family Distribution by Income Level	306,002	19.86	18.56	20.60	40.98	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	117,575	7.08	40.85	33.45	18.62	0.00
Median Family Income HUD Adjusted Median Family Income for 2004 Households Below Poverty Level		53,777 61,100 8.95%	Median Housing Value Unemployment Rate (2000 US Census)		131,523 2.24%	

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

Source: 2000 US Census and 2004 HUD updated MFI

Based on population, the Palm Beach MD is the smallest of the three MDs that comprise the MSA assessment area. According to the 2000 Census, it has a population of approximately 1.1 million, a 31% increase since the 1990 Census. Most of this increase represents an influx of people from the northern cities of the United States relocating to Florida.

Housing costs are very high. Not only is there housing demand for those permanently relocating to Florida, but there is also a demand for seasonal owner-occupied housing. Such demand, coupled with a declining inventory of vacant land, has resulted in high housing prices. According to the Florida Association of Realtors, the median price of an existing single-family home in February 2005 was \$352,900. This represents a 35% increase from the prior year. Community organizations note the critical need for affordable housing in the area.

The economy in the Palm Beach MD is strong. Major industries include real estate development, tourism, and the service industry. The banking industry in the Palm Beach MD is competitive. As of June 30, 2004 FDIC data showed 62 institutions operating 448 offices in the Palm Beach MD. These institutions include national, regional, and community banks.

There are opportunities for community development lending, investments, and services throughout the Palm Beach MD. Community development opportunities include working with and providing financing to organizations whose mission is to provide affordable housing and/or community services for low- and moderate-income persons, as well as organizations with a mission of economic development. Types of community development investments available in the MD include, but are not limited to, participation in local Community Development Corporations (CDCs”) and Community

Development Financial Institutions (“CDFIs”) and opportunities to contribute to numerous qualified non-profit organizations whose missions are focused on providing affordable housing, community services for low- and moderate-income persons, and economic development.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

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

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 in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column with the appropriate caption, such as: “Statewide/Regional,” “Statewide/Regional with potential benefit to one or more AAs” or “Out of Assessment Area.” “Out of Assessment Area” is used ONLY if the bank has otherwise adequately met the CD lending needs of its assessment area.
- 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 in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column with the appropriate caption, such as: "Statewide/Regional," "Statewide/Regional with potential benefit to one or more AAs" or "Out of Assessment Area." "Out of the Assessment Area" is used ONLY if the bank has otherwise adequately met the qualified investment needs of its assessment area.

**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: 1000021980 CITRUS BANK NA

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>												
Non-MSA Indian River County	50.00	10	3,858	0	0	0	0	0	0	10	3,858	65.42
MSA 5000 (Miami-Dade)	4.55	1	275	0	0	0	0	0	0	1	275	11.17
<b>Limited Review:</b>												
Non-MSA Highlands County	0.00	0	0	0	0	0	0	0	0	0	0	3.86
MSA 4900 (Melbourne)	45.45	10	199	0	0	0	0	0	0	10	199	19.54

\* 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 December 31, 2002.

\*\*\* Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.



Institution ID: 1000021980 CITRUS BANK NA

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>																
Non-MSA Indian River County	3	42.86	0.00	0.00	2.78	0.00	37.87	0.00	59.35	100.00	0.00	0.00	0.00	0.00	0.00	
MSA 5000 (Miami-Dade)	0	0.00	3.26	0.00	12.86	0.00	40.83	0.00	43.05	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Non-MSA Highlands County	0	0.00	0.00	0.00	8.53	0.00	91.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 4900 (Melbourne)	4	57.14	0.49	0.00	18.78	75.00	60.27	25.00	20.45	0.00	0.00	0.00	0.00	0.00	0.00	

\* 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: 1000021980 CITRUS BANK NA

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															
Geography: Florida															
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MSA Indian River County	3	42.86	0.00	0.00	2.78	0.00	37.87	0.00	59.35	100.00	0.00	0.00	0.00	0.00	0.00
MSA 5000 (Miami-Dade)	0	0.00	3.26	0.00	12.86	0.00	40.83	0.00	43.05	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Non-MSA Highlands County	0	0.00	0.00	0.00	8.53	0.00	91.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MSA 4900 (Melbourne)	4	57.14	0.49	0.00	18.78	100.00	60.27	0.00	20.45	0.00	0.00	0.00	0.00	0.00	0.00

\* 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: 10000021980 CITRUS BANK NA

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															
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MSA Indian River County	4	66.67	0.00	0.00	2.78	0.00	37.87	0.00	59.35	100.00	0.00	0.00	0.00	0.00	0.00
MSA 5000 (Miami-Dade)	0	0.00	3.26	0.00	12.86	0.00	40.83	0.00	43.05	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Non-MSA Highlands County	0	0.00	0.00	0.00	8.53	0.00	91.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MSA 4900 (Melbourne)	2	33.33	0.49	0.00	18.78	100.00	60.27	0.00	20.45	0.00	0.00	0.00	0.00	0.00	0.00

\* 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: 10000021980 CITRUS BANK NA

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE															Geography: Florida					Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>													
	#	% 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>	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Non-MSA Indian River County	3	42.86	10.38	0.00	14.71	0.00	20.35	0.00	54.57	100.00	0.00	0.00	0.00	0.00	0.00									
MSA 5000 (Miami-Dade)	0	0.00	23.32	0.00	16.40	0.00	19.19	0.00	41.09	0.00	0.00	0.00	0.00	0.00										
<b>Limited Review:</b>																								
Non MSA Highlands County	0	0.00	18.70	0.00	20.90	0.00	26.80	0.00	33.59	0.00	0.00	0.00	0.00	0.00										
MSA 4900 (Melbourne)	4	57.14	17.64	25.00	19.92	50.00	24.18	0.00	38.26	25.00	0.00	0.00	0.00	0.00										

<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 0.00% of loans originated.

<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: 10000021980 CITRUS BANK NA

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															
Geography: Florida															
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Non-MSA Indian River County	3	42.86	10.38	33.33	14.71	0.00	20.35	33.33	54.57	33.33	0.00	0.00	0.00	0.00	0.00
MSA 5000 (Miami-Dade)	0	0.00	23.32	0.00	16.40	0.00	19.19	0.00	41.09	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Non-MSA Highlands County	0	0.00	18.70	0.00	20.90	0.00	26.80	0.00	33.59	0.00	0.00	0.00	0.00	0.00	0.00
MSA 4900 (Melbourne)	4	57.14	17.64	25.00	19.92	25.00	24.18	50.00	38.26	0.00	0.00	0.00	0.00	0.00	0.00

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

\*\* As a percentage of loans with borrower income information available. No information was available for 0.00\*% of loans originated.

\*\*\* 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: 10000021980 CITRUS BANK NA

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				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*													
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
Non-MSA Indian River County	4	66.67	10.38	0.00	14.71	0.00	20.35	25.00	54.57	75.00	0.00	0.00	0.00	0.00	0.00									
MSA 5000 (Miami-Dade)	0	0.00	23.32	0.00	16.40	0.00	19.19	0.00	41.09	0.00	0.00	0.00	0.00	0.00										
<b>Limited Review:</b>																								
Non-MSA Highlands County	0	0.00	18.70	0.00	20.90	0.00	26.80	0.00	33.59	0.00	0.00	0.00	0.00	0.00										
MSA 4900 (Melbourne)	2	33.33	17.64	50.00	19.92	50.00	24.18	0.00	38.26	0.00	0.00	0.00	0.00	0.00										

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

\*\* As a percentage of loans with borrower income information available. No information was available for 0.00% of loans originated.

\*\*\* 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: 10000021980 CITRUS BANK NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: Florida									
Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002									
MA/Assessment Area:	Prior Period Investments <sup>*</sup>		Current Period Investments		Total Investments			Unfunded Commitments <sup>**</sup>	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Non-MSA Indian River County	0	0	1	3	1	3	< 1.00	0	0
MSA 5000 (Miami-Dade)	0	0	0	0	0	0	0	0	0
Regional			3	\$1,887,000	3	\$1,887,000	100.00	0	0
<b>Limited Review:</b>									
Non-MSA Highlands County	0	0	0	0	0	0	0.00	0	0
MSA 4900 (Melbourne)	0	0	0	0	0	0	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: 10000021980 CITRUS BANK NA

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003						
MA/Assessment Area (2003):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
MSA 2860 Ft Lauderdale	5.56	0	0	2	880	0	0	0	0	2	880	0.00
MSA 5000 Miami Dade	33.33	0	0	10	2,765	0	0	2	6,300	12	9,065	17.34
Non-MSA Indian River County	52.78	0	0	19	2,169	0	0	0	0	19	2,169	55.60
<b>Limited Review:</b>												
MSA 4900 Melbourne	0.00	0	0	0	0	0	0	0	0	0	0	16.07
MSA 8960 West Palm Beach	5.56	0	0	2	795	0	0	0	0	2	795	5.39
Non-MSA Highlands County	2.78	0	0	1	150	0	0	0	0	1	150	5.60

\* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2003 to December 31, 2003.

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



Institution ID: 1000021980 CITRUS BANK NA

Table 1. Other Products

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003								
MA/Assessment Area (2003):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
MSA 2860 Ft Lauderdale	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
MSA 5000 Miami Dade	21.43	6	189	0	0	0	0	0	0	0	0	3	186	17.34
Non-MSA Indian River County	46.43	13	279	0	0	3	180	1	5	0	0	6	85	55.60
<b>Limited Review:</b>														
MSA 4900 Melbourne	25.00	7	150	0	0	1	15	1	10	0	0	5	125	16.07
MSA 8960 West Palm Beach	7.14	2	1,755	0	0	1	1,750	0	0	0	0	0	0	5.39
Non-MSA Highlands County	0.00	0	0	0	0	0	0	0	0	0	0	0	0	5.60

\* Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2003 to December 31, 2003.

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

Institution ID: 1000021980 CITRUS BANK NA

Table 1. Other Products

LENDING VOLUME		Geography: FLORIDA		Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003	
MA/Assessment Area (2003):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
MSA 2860 Ft Lauderdale	0	0	0	0	0
MSA 5000 Miami Dade	3	3	0	0	0
Non-MSA Indian River County	3	9	0	0	0
<b>Limited Review:</b>					
MSA 4900 Melbourne	0	0	0	0	0
MSA 8960 West Palm Beach	1	5	0	0	0
Non-MSA Highlands County	0	0	0	0	0

\* The evaluation period for Optional Product Line(s) is from January 01, 2003 to December 31, 2003.

Institution ID: 1000021980 CITRUS BANK NA

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	% of Businesses ***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
MSA 2860 Ft Lauderdale	2	5.88	4.23	0.00	23.87	0.00	44.09	50.00	27.81	50.00	0.01	0.00	0.00	0.00	0.02									
MSA 5000 Miami Dade	10	29.41	5.27	0.00	22.49	20.00	32.39	40.00	39.42	40.00	0.01	0.00	0.02	0.01	0.01									
Non-MSA Indian River County	19	55.88	0.00	0.00	1.66	0.00	57.86	68.42	40.47	31.58	0.44	0.00	0.00	0.54	0.36									
<b>Limited Review:</b>																								
MSA 4900 Melbourne	0	0.00	1.55	0.00	25.61	0.00	44.51	0.00	28.32	0.00	0.01	0.00	0.03	0.00	0.00									
MSA 8960 West Palm Beach	2	5.88	3.91	0.00	23.48	0.00	33.84	0.00	38.63	100.00	0.00	0.00	0.00	0.00	0.01									
Non-MSA Highlands 03	1	2.94	0.00	0.00	22.22	0.00	77.78	100.00	0.00	0.00	0.09	0.00	0.00	0.11	0.00									

\* Based on 2003 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: 1000021980 CITRUS BANK NA

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
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 <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
MSA 2860 Ft Lauderdale	2	5.88	62.43	50.00	50.00	0.00	50.00	0.01	0.01
MSA 5000 Miami Dade	10	29.41	60.37	80.00	30.00	20.00	50.00	0.01	0.03
Non-MSA Indian River County	19	55.88	65.03	73.68	68.42	15.79	15.79	0.44	0.98
<b>Limited Review:</b>									
MSA 4900 Melbourne	0	0.00	65.65	0.00	0.00	0.00	0.00	0.01	0.02
MSA 8960 West Palm Beach	2	5.88	63.38	50.00	50.00	0.00	50.00	0.00	0.01
Non-MSA Highlands 03	1	2.94	67.05	100.00	0.00	100.00	0.00	0.09	0.25

<sup>\*</sup> Based on 2003 Peer Small Business Data -- US and PR

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

<sup>\*\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

<sup>\*\*\*\*</sup> 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 0.00% of small loans to businesses originated and purchased by the bank.

Institution ID: 10000021980 CITRUS BANK NA

Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS																		
Geography: FLORIDA																		
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003																		
MA/Assessment Area:	Geographic Distribution										Borrower Distribution							
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans
<b>Full Review:</b>																		
MSA 2860 Ft Lauderdale	0	0.00	2.70	0.00	27.22	0.00	45.05	0.00	25.03	0.00	23.18	0.00	16.50	0.00	18.50	0.00	41.81	0.00
MSA 5000 Miami Dade	6	21.43	4.95	0.00	28.95	0.00	34.47	66.67	31.63	33.33	25.63	0.00	15.18	0.00	17.15	0.00	42.04	0.00
Non-MSA Indian River County	13	46.43	0.00	0.00	3.71	0.00	57.38	76.92	38.90	23.08	15.90	0.00	14.82	15.38	17.67	30.77	51.61	0.00
<b>Limited Review:</b>																		
MSA 4900 Melbourne	7	25.00	1.26	0.00	20.99	85.71	49.85	14.29	27.90	0.00	21.46	0.00	17.69	28.57	20.14	0.00	40.70	0.00
MSA 8960 West Palm Beach	2	7.14	3.40	0.00	28.29	0.00	35.56	100.00	32.75	0.00	22.63	0.00	17.18	0.00	18.63	0.00	41.57	50.00
Non-MSA Highlands 03	0	0.00	0.00	0.00	14.78	0.00	85.22	0.00	0.00	0.00	23.10	0.00	18.74	0.00	21.23	0.00	36.94	0.00

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2000 Census Information.

Institution ID: 10000021980 CITRUS BANK NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: FLORIDA									
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 2860 Ft Lauderdale	0	0	0	0	0	0	0.00	0	0
MSA 5000 Miami Dade	0	0	0	0	0	0	0.00	0	0
Non-MSA Indian River County	0	0	0	0	0	0	0.00	0	0
<b>Limited Review:</b>									
MSA 4900 Melbourne	0	0	0	0	0	0	0.00	0	0
MSA 8960 West Palm Beach	0	0	0	0	0	0	0.00	0	0
Non-MSA Highlands 03	0	0	0	0	0	0	0.00	0	0

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

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

Institution ID: 1000021980 CITRUS BANK NA

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004						
MA/Assessment Area (2004):	% 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>												
MD 22744 Ft Lauderdale	11.76	0	0	4	1,065	0	0	0	0	4	1,065	0.00
MD 33124 Miami Dade	38.24	0	0	11	2,015	0	0	2	3,240	13	5,255	19.48
MD 48424 Palm Beach	5.88	0	0	2	875	0	0	0	0	2	875	3.95
MSA 46940 Indian River County	38.24	0	0	13	1,395	0	0	0	0	13	1,395	
Regional	2.94							1	1,000	1	1,000	52.09
<b>Limited Review:</b>												
MSA 37349 Palm Bay- Melbourne	0.00	0	0	0	0	0	0	0	0	0	0	17.37
Non-MSA Highlands County	2.94	0	0	1	93	0	0	0	0	1	93	7.11

\* Loan Data as of December 31, 2004. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2004 to December 31, 2004.

\*\*\* Deposit Data as of June 30, 2004. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: 1000021980 CITRUS BANK NA

Table 1. Other Products

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004								
MA/Assessment Area (2004):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans**		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>														
MD 22744 Ft Lauderdale	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
MD 33124 Miami Dade	21.74	5	619	0	0	2	558	0	0	0	0	2	60	19.48
MD 48424 Palm Beach	4.35	1	1,843	0	0	1	1,843	0	0	0	0	0	0	3.95
MSA 46940 Indian River County	60.87	14	207	0	0	2	75	1	12	0	0	7	91	52.09
<b>Limited Review:</b>														
MSA 37349 Palm Bay- Melbourne	8.70	2	13	0	0	0	0	0	0	0	0	1	10	17.37
Non-MSA Highlands County	4.35	1	2	0	0	0	0	0	0	0	0	1	2	7.11

\* Loan Data as of December 31, 2004. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Optional Product Line(s) is from January 01, 2004 to December 31, 2004.

\*\*\* Deposit Data as of June 30, 2004. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.



Institution ID: 1000021980 CITRUS BANK NA

Table 1. Other Products

LENDING VOLUME		Geography: FLORIDA		Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004	
MA/Assessment Area (2004):	Other Unsecured Consumer Loans*		Other Optional Loans*		
	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>					
MD 22744 Ft Lauderdale	0	0	0	0	0
MD 33124 Miami Dade	1	1	0	0	0
MD 48424 Palm Beach	0	0	0	0	0
MSA 46940 Indian River County	4	29	0	0	0
<b>Limited Review:</b>					
MSA 37349 Palm Bay- Melbourne	1	3	0	0	0
Non-MSA Highlands County	0	0	0	0	0

\* The evaluation period for Optional Product Line(s) is from January 01, 2004 to December 31, 2004.

Institution ID: 1000021980 CITRUS BANK NA

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: FLORIDA															
Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MD 22744 Ft Lauderdale	4	13.33	5.05	0.00	23.05	0.00	44.09	50.00	27.81	50.00	0.00	0.00	0.00	0.00	0.00
MD 33124 Miami Dade	11	36.67	5.27	0.00	22.49	9.09	32.39	63.64	39.42	27.27	0.00	0.00	0.00	0.00	0.00
MD 48424 Palm Beach	2	6.67	3.91	0.00	23.48	0.00	33.84	0.00	38.63	100.00	0.00	0.00	0.00	0.00	
MSA 46940 Indian River	13	43.33	0.00	0.00	14.69	7.69	57.60	46.15	27.71	46.15	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
MSA 37349 Palm Bay-Melbourne	0	0.00	1.55	0.00	25.61	0.00	44.51	0.00	28.32	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA Highlands County	1	3.23	0.00	22.22	100.00	0.00	77.78	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2004 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 (2004).

Institution ID: 10000021980 CITRUS BANK NA

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004				
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 <sup>1</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
MD 22744 Ft Lauderdale	4	13.33	62.43	25.00	50.00	25.00	25.00	0.00	0.00
MD 33124 Miami Dade	11	36.67	60.37	63.64	36.36	27.27	36.36	0.00	0.00
MD 48424 Palm Beach	2	6.67	63.38	50.00	0.00	0.00	100.00	0.00	0.00
MSA 46940 Indian River	13	43.33	65.03	53.85	61.54	30.77	7.69	0.00	0.00
<b>Limited Review:</b>									
MSA 37349 Palm Bay-Melbourne	0	0.00	65.65	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA Highlands County	1	3.23	67.05	100.00	100.00	0.00	0.00	0.00	0.00

<sup>1</sup> Based on 2004 Peer Small Business Data -- US and PR

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

<sup>\*\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2004).

<sup>\*\*\*\*</sup> 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 20.00% of small loans to businesses originated and purchased by the bank.

Institution ID: 10000021980 CITRUS BANK NA

Table 13. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS																		
Geography: FLORIDA																		
Evaluation Period: JANUARY 1, 2004 TO DECEMBER 31, 2004																		
MA/Assessment Area:	Geographic Distribution										Borrower Distribution							
	Total Consumer Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total*	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds*	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans	% of Hhlds**	% of BANK Loans
<b>Full Review:</b>																		
MD 22744 Ft Lauderdale	0	0.00	2.89	0.00	27.02	0.00	45.05	0.00	25.03	0.00	23.18	0.00	16.50	0.00	18.50	0.00	41.81	0.00
MD 33124 Miami-Dade	5	22.73	4.95	0.00	28.95	20.00	34.47	40.00	31.63	40.00	25.63	0.00	15.18	0.00	17.15	0.00	42.04	40.00
MD 48424 Palm Beach	1	4.55	3.40	0.00	28.29	0.00	35.56	100.00	32.75	0.00	22.63	0.00	17.18	0.00	18.63	0.00	41.57	
MSA 46940 Indian River County	14	63.64	0.00	0.00	17.08	28.57	60.55	57.14	22.37	14.29	15.90	0.00	14.82	7.14	17.67	7.14	51.61	21.43
<b>Limited Review:</b>																		
MSA 37349 Palm Bay- Melbourne	2	9.09	1.26	0.00	20.99	100.00	49.85	0.00	27.90	0.00	21.46	50.00	17.69	0.00	20.14	0.00	40.70	0.00
Non-MSA Highlands County	1	4.35	0.00	0.00	14.78	0.00	85.22	100.00	0.00	0.00	23.10	0.00	18.74	0.00	21.23	0.00	36.94	0.00

\* Consumer Loans originated and purchased in the MA/AA as a percentage of all consumer loans originated and purchased in the rated area.

\*\* Percentage of households is based on 2000 Census Information.

Institution ID: 10000021980 CITRUS BANK NA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: FLORIDA									
Evaluation Period: JANUARY 1, 2004 TO March 31, 2005									
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>									
MD 22744 Ft Lauderdale	0	0	0	0	0	0	0.00	0	0
MD 33124 Miami Dade	0	0	0	0	0	0	0.00	0	0
MD 48424 Palm Beach	0	0	0	0	0	0	0.00	0	0
MSA 46940 Indian River	0	0	0	0	0	0	0.00	0	0
Regional	0	0	3	1,689	3	1,689	44.00	0	0
<b>Limited Review:</b>									
MSA 37349 Palm Bay-Melbourne	0	0	1	2,000	2	2,000	56.00	0	0
Non-MSA Highlands County	0	0	0	0	0	0	0.00	0	0

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

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

Institution ID: 10000021980 CITRUS BANK NA

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, 2004																	
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>																	
MD 22744 Ft Lauderdale	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	3.57	26.43	43.13	26.88
MD 33124 Miami Dade	19.48	3	37.50	0.00	0.00	66.67	33.33	3	0	0	0	+2	+1	4.89	28.61	35.68	30.79
MD48424 Palm Beach	3.95	1	12.50	0.00	0.00	100.00	0.00	1	0	0	0	+1	0	4.21	29.32	33.88	
MSA 46940 Indian River	52.09	2	25.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	16.49	61.66	21.84
<b>Limited Review:</b>																	
MSA 37349 Palm Bay-Melbourne	17.37	1	12.50	0.00	100.00	0.00	0.00	0	0	0	0	0	0	1.34	19.21	51.27	28.17
Non-MSA Highlands County	7.11	1	12.50	0.00	0.00	100.00	0.00	1	0	0	0	0	0	0.00	0.00	100.00	0.00

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