

LARGE BANK

Comptroller of the Currency
Administrator of National Banks

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Community Reinvestment Act Performance Evaluation

The International Bank of Miami, National Association
Charter Number: 15268

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NOTE: 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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General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of **The International Bank of Miami, National Association** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of February 7, 2000. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

Community Development (CD) - Affordable 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.

Full-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

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

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

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States 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 Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders' equity, perpetual preferred shareholders' equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

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

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

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	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:

- < The bank had an adequate responsiveness in meeting the credit needs in their assessment area (AA). An adequate percentage of loans were made in the bank's AA.
- < The overall geographic distribution of loans in the AA was adequate.
- < The overall distribution of loans by income level of borrower was adequate.
- < The bank made a relatively high level of community development loans. Several business loans exceeding \$1 million were originated in designated urban areas that will promote economic development and create permanent jobs for low- and moderate-income individuals. The bank's community development lending also included multi-family residential loans in the AA's low- and moderate-income communities.
- < The bank had an adequate level of investments. The dollar amount of the investments supports the bank's responsiveness to community development needs.

- < The bank's service delivery systems were reasonably accessible to geographies and individuals of different income levels in the AA. Branch hours do not vary in a way that inconveniences the branch's retail customers.

Description of Institution

The International Bank of Miami, NA (TIBOM) is an intrastate commercial bank headquartered in Miami, Florida. The bank is a 99.7% owned subsidiary of International Bancorp of Miami, Inc a United States one-bank holding company. The holding company is in turn owned primarily by an offshore entity Granvalor Holdings, S.A. a Panamanian Company. The bank has no operating subsidiaries.

Since the mid-1980s TIBOM's primary business focus was to provide financial services to Latin American banks and individuals. The bank has one office located in Miami's financial district near Brickell Avenue. Near the bank are many U.S. and foreign banks with offices that specialize in trade finance and correspondent banking to Latin America. TIBOM's business activities are centered in: (1) correspondent banking that provide lines and letters of credit to Latin American banks and payable through account deposit services; (2) corporate trade financing that provides credit to local and foreign companies; (3) private banking that attracts deposits and provides banking services to high net worth Latin American customers; and, (4) capital markets which acts as an intermediary for debt and equity securities trading, and arranging credit facilities for Latin American and Caribbean clients.

During our evaluation period TIBOM's funding sources came primarily from foreign banks, foreign individuals, and U.S. financial institutions. These deposits tended to be large and short term and a high level of liquid assets were maintained to meet potential withdrawals.

Over 90% of the bank's loan portfolio are classified in 3 loan categories: loans in foreign offices; commercial real estate loans; and commercial and industrial loans. Loans in foreign offices, the largest component (57% of the portfolio), consists of short-term trade credits through correspondent banks in Latin America and companies operating in South Florida. Since 1997, the growth of loans in foreign offices increased 121%. Also, significant loan growth has come from commercial first mortgages on South Florida real estate (18% of the portfolio) and mortgages on multifamily dwellings (11% of the portfolio). Real estate loan growth has been strong during the last two years increasing 75% since 1997.

A domestic lending division was established in the early 1990s. Among the loans offered by this division include, residential, commercial real estate, and small business loans through the Small Business Administration. The bank's current strategy is to increase domestic loans and deposits. Despite the increase of

domestic lending (small business loan data for 1998 had TIBOM ranked thirty-ninth among financial institutions in its AA with a .1% market share), international operations remains the major part of the bank's business.

Competition for retail loan products and small business lending in the bank's AA, especially HMDA lending, is strong. TIBOM ranked 159th in HMDA lending during 1998. As a result, home mortgage loans are mostly offered as a product to the bank's private banking customers who supply a significant funding source to the bank. These are high net worth Latin American citizens who own second residences in Miami, therefore 77% of the home purchases and 70% of the home mortgage refinance loans were made in upper-income census tracts.

The bank's strategic focus to lend on multifamily investment properties somewhat improves their overall HMDA performance. Over 30% of multifamily HMDA loans originated in the AA were located in low- and moderate-income census tracts. The multifamily HMDA loans recognized as community development loans provided the majority of rental units to low- and moderate-income families some of whom received subsidized housing.

The following table is intended to provide a perspective on TIBOM's capacity to help meet the needs of its assessment area. There are no known legal or financial factors, which have impeded the bank's ability to help meet the credit needs of its assessment area. The bank's rating at the last CRA examination dated January 29, 1998 was *Satisfactory Record of Meeting Community Credit Needs*.

Table 1: Financial Information (000s)

	12/31/99	Percent Of Average Assets	12/31/98	Percent Of Average Assets	12/31/97	Percent Of Average Assets
Tier 1 Capital	37,186	6.7%	30,084	6.2%	23,230	6.7%
Total Assets	614,988	100%	506,450	100%	406,081	100%
Total Deposits	479,528	80.3%	397,162	78.4%	306,578	75.5%
Foreign Deposits	161,508	25.1%	113,688	26.3%	122,201	27.4%
Real Estate Loans	135,151	25.4%	108,112	24.4%	77,288	23.2%
Commercial Loans	17,919	3.4%	17,799	4.0%	8,819	2.6%
Loans in Foreign Offices	249,253	46.8%	192,400	43.4%	112,954	33.9%

Scope of the Evaluation

Scope of the Review

In assessing TIBOM's performance under the Community Reinvestment Act (CRA), we reviewed HMDA reportable loans, small business loans, and community development loans and investments. TIBOM chose not to provide consumer loan data. The bank reported 101 small business loans (33 for 1998 and 68 for 1999) and 214 HMDA reportable loans (122 for 1998 and 92 for 1999). The bank originated no small farm loans during the assessment period.

We assessed TIBOM's qualified investments and donations to community service organizations. Our evaluation of services included analyzing the bank's availability and effectiveness for delivering retail-banking services. We also considered the extent of TIBOM's community development services in meeting the needs of the assessment area.

Evaluation Period/Products Evaluated

During this evaluation, we included a review of home mortgage, small business, and community development loan data for the calendar years 1998 and 1999. The HMDA data included home purchases and refinancing loan data for the evaluation period. For the Service and Investment Tests, the evaluation period covered the time frames between January 1, 1998 and February 7, 2000.

Data Integrity

We verified the accuracy of the bank's 1998 and 1999 HMDA, small business and community development data prior to the start of this CRA examination. A statistical sample was drawn to determine the accuracy for both HMDA and small business loans. The error rate was not excessive and we did not need to have TIBOM re-file their small business data for 1998.

All loans designated as community development and 100% of the investments designated as community development were reviewed to verify that they qualified, as defined under the CRA regulation. In evaluating investments and services we relied on data from January 1, 1998 through February 7, 2000. Information on community loans originated between January 1, 1968 and December 31, 1999 was relied on to determine the eligibility of these loans.

Selection of Areas for Full-Scope Review

The bank has only one AA, which includes Miami-Dade County Florida, the entire Miami Metropolitan MSA #5000. A full scope review was conducted of the bank's AA. All ratings were based on the one AA. See Table 1 in Appendix C for more information.

Ratings

The bank's overall rating is based on TIBOM's performance in Miami-Dade County. Home mortgage, small business, and community development loans were the primary loans used in assessing the bank's lending performance. Many of the large regional financial institutions in the AA provide a significant amount of funding to homeownership. The competitive mortgage market limits the bank's lending primarily to their private banking customers. Due to the bank's focus on commercial lending and their reliance on wholesale funding more weight was given to small business lending in arriving at the overall lending test rating. In terms of HMDA products, more consideration was given to multi-family loans listed as community development lending. The bank's multi-family lending is more favorable to the business strategy. The bank made no farm loans or Home Improvement loans during the assessment period.

Other

Two community groups were contacted during this review. One contact was a county government agency that administers federal and state funding supporting development of viable urban neighborhoods in Miami-Dade County. The other contact was the local chapter of a national organization that assists neighborhood-based Community Development Corporations focusing primarily on affordable housing, small business development, and economic development.

Miami-Dade County is the sixth poorest county in the United States with a wide range of community development opportunities offered throughout the bank's AA. Countywide programs are offered by the Miami-Dade Office of Community and Economic Development. In addition, there are numerous Community Development Corporations in the Overtown, Opa-Locka, Liberty City, and East Little Havana where affordable housing and private sector interests need strengthening. In order to promote the goal of increasing home ownership, home buyers assistance programs are in place to help renters who can pay the monthly costs of homeownership but cannot acquire the up front acquisition, rehabilitation, and new construction of affordable housing. Other opportunities exist for bankers that should provide an approach to let entrepreneurs emerge and develop. In addition to small business lending, low- and moderate-income multi-family lending was also seen as one area not adequately satisfied by area financial institutions.

Fair Lending Review

A concurrent fair lending review did not identify any violations of the substantive provisions of anti-discrimination laws or regulations. Our review focused on the adequacy of fair lending policies and compliance with substantive provisions of the Equal Credit Opportunity Act (ECOA). We sampled approved and denied loan applications for HMDA loan products originated by various loan officers. TIBOM has an effective system in place to comply with fair lending regulations.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated **Low Satisfactory**. Based on the full-scope review, the bank's performance in the Miami-Dade County, Miami Metropolitan MSA #5000 is adequate.

Lending Activity

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

TIBOM demonstrated adequate responsiveness to the credit needs of the assessment area based on its deposit market share and aggregate market share. As of June 30, 1999, the bank ranked twentieth in Miami-Dade County, Miami Metropolitan MSA#5000 with total deposits of \$315 million and a market share of .80%.

TIBOM generated 64 small business loans totaling \$21.8 million and 94 HMDA loans totaling \$34.1 million within its AA. An adequate percentage of loans were made in the bank's AA. During the evaluation period 63% of all small business loans were made within the bank's AA and 71% of the HMDA loans were made within the AA. Overall lending within the AA during the evaluation period was 68%. We did not identify any conspicuous gaps in the bank's lending activities.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans was adequate. The geographic distribution of HMDA loans was poor. The geographic distribution of small loans to businesses was excellent.

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.

TIBOM's geographic distribution of HMDA lending is poor. There were no HMDA reportable Home Improvement loans during the assessment period.

The geographic distribution of *Home Purchase Loans* is poor. The bank originated no home purchase loans within low-income geographies. The bank's percent of home purchase originations in moderate-income geographies was somewhat lower than the percent of owner-occupied units in moderate-income geographies. The bank's home purchase loan market share to moderate-income geographies was equal to its overall home purchase loan market share.

The geographic distribution of *Home Mortgage Refinance Loans* is poor. The bank originated no home refinance loans within low-income geographies. The bank's percent of home mortgage refinance loans in moderate-income geographies was significantly lower than the percent of owner-occupied units in moderate-income geographies. The bank's market share to home refinance loans to moderate-income geographies was equal to its overall home refinance market share.

Small Loans to Businesses

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of *Small Loans to Businesses* was excellent. The bank's percent of loans originated in low-income geographies exceeded the percent of businesses in low-income geographies. The market share of small loans to businesses in low-income tracts was equal to the bank's overall market share of small loans to businesses. The bank's percent of loans originated in moderate-income geographies exceeded the percent of businesses in moderate-income geographies. The market share of small loans to businesses in moderate-income geographies was equal to the bank's overall market share of small loans to businesses.

Distribution of Loans by Income Level of the Borrower

The overall distribution of all loans by income level of the borrower was adequate. Borrower distribution by income for home mortgage loans was poor. Borrower

distribution of loans to small businesses was good.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Borrower Distribution by income of *Home Purchase Loans* was poor. The bank originated no home purchase loans to low-income borrowers. The bank's percent of home purchase loans to moderate-income borrowers is significantly lower than the percent of moderate-income families in the AA. The market share of home purchase loans to moderate-income borrowers was equal to the bank's overall home purchase loan market share in the AA.

Borrower Distribution by income of *Home Mortgage Refinance Loans* was very poor. The bank originated no home mortgage refinance loans to low- and moderate-income borrowers.

Small Loans to Businesses

Refer to Table 10 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.

TIBOM's lending to small businesses with revenues of \$1 million or less was good. The bank's percent of small loans to businesses with revenues of \$1 million or less was near the percent of all small businesses with revenues of \$1 million or less in the AA. Approximately 83% of the bank's small business loans (regardless of business size) were greater than \$100 thousand. TIBOM's market share of loans to small businesses was equal to the bank's overall market share of all business loans.

Community Development Lending

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

TIBOM has made a relatively high level of community development loans. During the assessment period TIBOM originated 11 loans totaling \$18.5 million that met the criteria of community development loans.

TIBOM originated four business loans, each exceeding \$1 million, that qualified for community development consideration. A \$3.4 million loan to a 124-unit motel

located in one of Miami's enterprise zones and Federal Enterprise Community will be used to finance renovation of the hotel. The newly renovated facility will promote economic development by creating permanent jobs for low- and moderate-income individuals. The hotel, after renovation, will have a staff of 61 employees 36 (59%) of whom will have salaries which fall into the low- or moderate-income range for the AA. Another loan in the amount of \$3.6 million to a 65-unit hotel in an area targeted for redevelopment by local and Federal governments was originated during the assessment period. The proceeds for the renovation will create additional jobs for low- and moderate-income individuals. Two business loans in the amount of \$1.2 million and \$2.3 million were to multi-tenant retail showroom complexes located in enterprise zones and Federal Enterprise Communities. In addition to benefiting the low- and moderate-income areas by providing services to the residents of the area, the loans will retain and improve jobs for low- and moderate-income individuals.

Seven loans meeting the qualifications for low-income housing were to multi-family dwellings that were included in the HMDA data and were located in low- and moderate-income geographies. The apartments, collateralizing the loans, had a total of 356 units, of which 190 units (55%) were rented to low- and moderate-income families. While additional information suggested low- and moderate-income individuals or families rented more units, TIBOM was unable to verify the data.

Product Innovation and Flexibility

The institution does not participate in any flexible lending programs. The bank had no innovative loan programs.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated **Low Satisfactory**. Based on the full scope review, the bank's performance in the Miami-Dade County, Miami Metropolitan MSA#5000 is adequate.

Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Under a community development initiative TIBOM made 2 qualified investments totaling \$629 thousand during 1998 and 1999. The investments were in a Taxable Increment Revenue Bond to the Miami Beach Redevelopment Agency. The proceeds were used to finance the redevelopment of a moderate-income census tract located in the bank's AA. The reconstruction of the structures is expected to facilitate new jobs primarily to low- and moderate-income individuals.

TIBOM also made 9 small grants totaling \$13,250 to 6 organizations that support community activities targeted to low- and moderate-income persons in the bank's AA. The funds were allocated between youth programs within low- and moderate-census tracts and a local financial intermediary that focuses on affordable housing, small business development, and economic development.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test was rated **Low Satisfactory**. Based on full-scope review, the bank's performance in the Miami-Dade County, Miami Metropolitan MSA#5000 was adequate.

Retail Banking Services

Refer to Table 13 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.

The bank offers banking services through one location located in a middle-income geography in their AA. The location of the one office is reasonably accessible to the bank's primary customer base that maintains their principal businesses within Miami's Central Business District. Their service delivery system is reasonably accessible to geographies and individuals of different income levels in its AA. TIBOM offers a full range of retail services at the branch location. The branch's

hours do not vary in a way that inconveniences the branch's retail customers. There were no changes in the branch locations during the assessment period.

Community Development Services

Given the available opportunities, TIBOM has provided an adequate level of community development services. Currently three officers, as representatives of TIBOM, provide technical assistance to nonprofit organizations that help to meet the credit needs of low- and moderate-income individuals and small businesses. Two other bank officers provide technical assistance about financial services directly to community based groups that serve low- and moderate-income areas. The activities provided to these organizations include serving on a loan committee, furnishing financial services training for staff and management, and assisting in fund raising, including soliciting investments.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term **AFull-Scope@**) and those that received a less comprehensive review (designated by the term **ALimited-Scope@**).

Time Period Reviewed	Lending Test: January 1, 1998 to December 31, 1999 Investment Test: January 1, 1998 to February 7, 2000 Service Test: January 1, 1998 to February 7, 2000	
Financial Institution	Products Reviewed	
The International Bank of Miami, N. A.(TIBOM) Miami, Florida	Home Mortgage Loans, Small Business and Community Development Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
NA	NA	NA
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Miami-Dade County, Miami Metropolitan MSA#5000	Full-Scope	None

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Miami-Dade County	B-1
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Miami-Dade County, Miami Metropolitan MSA#5000

Demographic Information for Full-Scope Area: Miami-Dade County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	267	13%	21%	36%	28%	1%
Population by Geography	1,937,094	9%	19%	39%	32%	0%
Owner-Occupied Housing by Geography	376,006	3%	13%	41%	43%	0%
Businesses by Geography	100,051	11%	19%	31%	39%	0%
Farms by Geography	1,767	3%	14%	36%	47%	0%
Family Distribution by Income Level	485,213	23%	16%	19%	41%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	192,725	15%	27%	40%	17%	0%
Median Family Income HUD Adjusted Median Family Income for 1999 Households Below the Poverty Level	= \$33,980 = \$42,400 = 17.6%	Median Housing Value Unemployment Rate				= \$100,570 = %7.3

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 U.S. Census and 1999 HUD updated MFI.

TIBOM's assessment area includes all of Miami-Dade County Florida, which is the entire Miami Metropolitan MSA#5000. Miami-Dade County reported a population of 1.9 million in the 1990 census. The county's population continues to grow, as the metropolitan region attracts new residents. The fastest growing population in the county is the retiring elderly. In-migration to Miami-Dade County, combined with new births, is expected to increase the metropolitan area's 1997 population of 2.05 million to 2.29 million in the Year 2000, and 2.77 million in 2010. Miami-Dade was the sixth poorest of the nation's large counties and the City of Miami was ranked as the fourth poorest city in the United States. Miami-Dade County's diversified economy includes manufacturing, service, trade, financial, agriculture, real estate, and construction companies. Tourism also adds more than \$10 billion of total revenues annually. Service, trade, and manufacturing are Miami-Dade County's three largest business sectors. The largest private employers include American Airlines, the University of Miami, and Bell South. Major public employers include Dade County Public Schools, Metropolitan Dade County, and Jackson Memorial Hospital.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the **Abank@** include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations/purchases; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; 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 MSA/assessment area.

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 MSA/assessment area.
- 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 rank and 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 Refinance Loans** - See Table 2.
- Table 5. 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 rank and market share information based on the most recent aggregate market data available.
- Table 6. 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 rank and market share information based on the most recent aggregate market data available.

- Table 7. 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 MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 11. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500 thousand) 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.
- Table 13. 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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.
- Table 14. 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 the population 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 MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME		State: Florida		Evaluation Period: January 1, 1998 TO December 31, 1999									
MSA/Assessment Area:	% of Rated Area Deposits in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development		Total Reported Loans		% of Rated Area Loans(#) in MSA/AA	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000 s)	#	\$ (000's)	#	\$ (000's)		
Full-Scope:													
Miami-Dade County - MSA#5000	100%	94	34,136	64	21,792	0	0	11	18,541	169	70,904	100%	

* Deposit data as of June 30, 1999

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		State: Florida		Evaluation Period: January 1, 1998 TO December 31, 1999												
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% 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	#	% of Total **
Full-Scope:																
Miami-Dade County - MSA#5000	3%	0%	13%	8%	41%	15%	43%	77%	132	< 1	< 1	< 1	< 1	< 1	39	100%

(*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT																	State: Florida		Evaluation Period: January 1, 1998 TO December 31, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans					
	% 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	#	% of Total **				
Full-Scope:																				
Miami-Dade County - MSA#5000	3%	0%	13%	0%	41%	0%	43%	0%	NA	NA	NA	NA	NA	NA	0	NA				

(*) Based on 199X Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE																	State: Florida		Evaluation Period: January 1, 1998 TO December 31, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans					
	% 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	#	% of Total **				
Full-Scope:																				
Miami-Dade County - MSA#5000	3%	0%	13%	6%	41%	24%	43%	70%	130	< 1	< 1	< 1	< 1	< 1	33	100%				

(*) Based on 199X Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES										State: Florida		Evaluation Period: January 1, 1998 TO December 31, 1999				
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans	
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full-Scope:																
Miami-DadeCounty-MSA5000	9%	11%	19%	22%	28%	16%	44%	51%	39	< 1	< 1	< 1	< 1	< 1	64	100%

(*) Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

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

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS										State: Florida		Evaluation Period: January 1, 1998 TO December 31, 1999				
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans	
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**
Full-Scope:																
Miami-Dade County-MSA#5000	3%	0%	14%	0%	37%	0%	46%	0%	NA	NA	NA	NA	NA	NA	0	100%

(*) Based on 1998 Aggregate Small Farm Data only. Market rank is for all income categories combined.

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

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE																	State: Florida		Evaluation Period: January 1, 1998 TO December 31, 1999				
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans								
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***							
Full-Scope:																							
Miami-Dade County - MSA#5000	24%	0%	16%	7%	19%	16%	41%	77%	132	< 1	< 1	< 1	< 1	< 1	39	100%							

(*) As a percentage of loans with borrower income information available. No information was available for 20.5% of loans originated and purchased by the bank.
 (**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.
 (***) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT																	State: Florida		Evaluation Period: January 1, 1998 TO December 31, 1999				
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans								
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***							
Full-Scope:																							
Miami-Dade County - MSA#5000	24%	0%	16%	0%	19%	0%	41%	0%	NA	NA	NA	NA	NA	NA	0	NA							

(*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the bank.
 (**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.
 (***) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		State: Florida		Evaluation Period: January 1, 1998 TO December 31, 1999												
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***
Full-Scope:																
Miami-Dade County - MSA#5000	24%	0%	16%	0%	19%	13%	41%	87%	130	< 1	< 1	< 1	< 1	< 1	33	100%

(*) As a percentage of loans with borrower income information available. No information was available for 9.1% of loans originated and purchased by the bank.

(**) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			State: Florida			Evaluation Period: January 1, 1998 TO December 31, 1999							
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Loans to Businesses				
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total*****			
Full-Scope:													
Miami-Dade County MSA #5000	75%	73%	49%	17%	25%	58%	< 1	< 1	64	100%			

(*) Businesses with revenues of \$1 million or less as a percentage of all businesses.

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

(***) The market consists of all other Small Business reporters in the MSA/AA and is based on 1998 Aggregate Small Business Data only.

(****) Based on 1998 Aggregate Small Business Data only.

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

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS State: Florida Evaluation Period: January 1, 1998 TO December 31, 1999										
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans	
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total*****
Full-Scope:										
Miami-Dade County - MSA#5000	92%	0%	85%	0%	0%	0%	NA	NA	0	100%

(*) Farms with revenues of \$1 million or less as a percentage of all farms.

(**) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0% of small loans to farms originated and purchased by the bank.

(***) The market consists of all other Small Farm reporters in the MSA/AA and is based on 1998 Aggregate Small Farm Data only.

(****) Based on 1998 Aggregate Small Farm Data only.

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

Table 12. Qualified Investments

QUALIFIED INVESTMENTS State: Florida Evaluation Period: January 1, 1998 TO February 7, 2000									
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$=	#	\$ (000's)
Full-Scope:									
Miami-Dade County - MSA#5000	0	0	11	642	11	642	100	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 reported on the Report of Condition Schedule-L Off Balance Sheet Items.

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				State: Florida				Evaluation Period: January 1, 1998 TO February 7, 2000									
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches In MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Miami-Dade County - MSA#5000	100%	1	100%	0	0	1	0	0	0	0	0	0	0	14%	21%	36%	28%

