



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act **Performance Evaluation**

International Bank Of Miami, National Association
Charter Number: 15268

121 Alhambra Plaza
Coral Gables, FL 33134

Office of the Comptroller of the Currency

ADC-South Florida (Miami)
9800 Northwest 41st Street Suite 120
Miami, FL 33172

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 **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	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Lending activity that reflects a good responsiveness to credit needs of the bank's assessment area.
- Good geographic distribution of loans.
- Adequate distribution of loans by income level of the borrower.
- High level of community development lending which had a positive impact on the Lending Test.
- A good level of qualified investments, given available opportunities.
- Service delivery systems that are reasonably accessible to geographies, businesses and individuals of different income levels and an adequate level of community development services.

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

Metropolitan Area (MA): Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

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

Description of Institution

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 owned primarily by an offshore entity Granvalor Holdings, S.A. a Panamanian Company. The bank has no operating subsidiaries.

As of December 31, 2002, TIBOM had total assets of \$1.0 billion compared with \$946 million a year earlier. Tier One Capital amounted to \$74 million and the loan to deposit ratio was 94%. Components of the bank’s \$736 million loan portfolio include international-related loans (44%); commercial real estate, including SBA-guaranteed and construction loans, (38%); commercial and industrial loans (14%); and 1-4 family residential real estate lending (4%).

TIBOM has one office located in the financial district of the City of Coral Gables, a large municipality within central Miami-Dade County. The bank’s original business focus was to provide financial services to Latin American banks and individuals. Business activities centered in correspondent banking, trade financing, private banking, capital markets, and corporate financing and other credit services to local and foreign companies. In the early 1990’s the bank made a strategic shift, expanding its focus with the establishment of a domestic lending division. Products offered by this division include, residential mortgage loans, commercial real estate loans including loans for multi-family housing, and small business loans, primarily through the Small Business Administration (“SBA”). The domestic lending division primarily sources its products through loan brokers.

As a result of the strategic shift, domestic loans continually increased. By year-end 2000, domestic loans represented 41% of total loans, and by year-end 2002, they represented 56%. At the same time, the level of domestic deposits increased. However, the majority (an average of 70% during the evaluation period) of TIBOM’s funding continues to be derived from foreign deposits.

The bank’s overall business strategy and its limited presence in the assessment area have shaped its CRA strategy. CRA efforts are primarily focused in multi-family housing lending and small loans to businesses.

There are no legal, financial or other factors impeding the bank’s ability to help meet the credit needs of its assessment area. The bank’s rating at the last CRA examination dated February 7, 2000 was “**Satisfactory**”.

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 and community development loans.

With the exception of community development loans, the evaluation period for the Lending Test is January 1, 2000 through December 31, 2002. For community development loans, the Investment Test and the Service Test, the evaluation period is February 8, 2000 through April 14, 2003.

Data Integrity

This evaluation is based on accurate data. We verified the accuracy of the bank's 2000, 2001 and 2002 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. 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

The bank has only one assessment area, which includes all of the Miami-Dade Metropolitan Statistical Area ("MSA") 5000. A full scope review was conducted of that assessment area.

Ratings

The bank's overall rating is based on its performance in the Miami-Dade MSA. Home mortgage loans, loans to small businesses, and community development loans were the primary products used in assessing the bank's lending performance. Since the bank's strategic focus is commercial lending, multi-family HMDA loans and loans to small businesses are more heavily weighted than home purchase loans. No home improvement or small farm loans were made during this evaluation period. The number of refinance loans is not sufficient enough for a meaningful analysis.

Other

Community credit needs in the assessment area were determined by reviewing recent community contacts conducted by the OCC in connection with other CRA examinations of banks operating in the same assessment area. We conducted a community contact with the local office of a national organization whose mission is to assist financial institutions in providing innovative and flexible home mortgage products to low- and moderate-income borrowers. Additionally, a review was made of the U. S. Department of Housing and Urban

Development (“HUD”) 5-year Consolidated Plan (1999 to 2004) for the City of Miami. HUD Consolidated Plans are comprehensive reports that identify community credit needs and community development opportunities.

The most critical identified credit need for the Miami-Dade MSA 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 is another identified need. Also, there is a stated need to create jobs accessible to low- and moderate-income individuals through the creation or expansion of small businesses as well as a need for access to community development funding that promotes the revitalization and stabilization of poor neighborhoods.

Fair Lending Review

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated ("High Satisfactory"). Based on a full-scope review, the bank's performance in the Miami-Dade MSA is good.

Lending Activity

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

Lending activity reflects a good responsiveness to the credit needs in TIBOM's assessment area, considering the bank's business strategy and the highly competitive nature of the market in which it operates.

FDIC data as of June 30, 2001 shows that TIBOM had a 1.08% deposit market share in the Miami-Dade MSA, ranking 14th among financial institutions operating in the MSA. Based on 2001 HMDA aggregate data, the bank is ranked 3rd among multi-family lenders in overall volume with a 6.64% market share, which exceeds the bank's deposit market share and rank. TIBOM's market share of home purchase loans was 10/100ths of 1% and its market share of small business loans was 7/100ths of 1%, both lower than the bank's deposit market share. TIBOM's home purchase loan ranking was 114th and its small business ranking was 44th, reflecting the competitiveness of the market in the MSA. Refer to Appendix B for details.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

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

Overall, the geographic distribution of HMDA loans is good.

The geographic distribution of home purchase loans is adequate. The percentage of home purchase loans in low-income geographies exceeds the percentage of owner-occupied units in these geographies. The percentage of home purchase loans in moderate-income geographies is lower than the percentage of owner-occupied units in these geographies. The bank's market share of home purchase loans in low-income geographies is somewhat lower than their overall market share. The bank's market share of home purchase loans in moderate-income geographies is lower than their overall market share.

The geographic distribution of multi-family loans is excellent. The percentage of multi-family loans in low-income geographies exceeds the percentage of multi-family units in these geographies. The percentage of multi-family loans in moderate-income geographies exceeds

the percentage of multi-family units in these geographies. The bank's market share of multi-family loans in low- and moderate-income geographies is near to their overall market share.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is good. The percentage of small loans to businesses in low-income geographies exceeds the percentage of small businesses in these geographies. The percentage of small loans to businesses in moderate-income tracts is near to the percentage of small businesses in these geographies. The bank's market share of small loans to businesses in low-income geographies exceeds their overall market share. The bank's market share of small loans to businesses in moderate-income geographies is near to their overall market share.

Lending Gap Analysis

No unexplained, conspicuous gaps in lending were identified. We reviewed lending reports detailing the volume of HMDA and small loans to businesses in low- and moderate-income geographies.

Inside/Outside Ratio

A majority of the bank's loan originations is within its defined assessment area. Overall, 77% of TIBOM's loan originations are within its assessment area. By loan products, 85% of HMDA loans and 67% of small loans to businesses are inside the assessment area.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income in the assessment area is adequate. The distribution of HMDA home mortgage loans by borrower income is very poor. The distribution of small loans to businesses by revenue size is excellent.

Home Mortgage Loans

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

The distribution of HMDA loans by borrower income level is very poor. The bank originated no home purchase loans to low-income or to moderate-income borrowers during the evaluation period.

Small Loans to Businesses

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

The distribution of small loans to businesses is excellent. The bank's percentage of small loans to small businesses (businesses with annual revenues \$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 their overall market share of small loans to all businesses. A majority of the bank's loans to small businesses is for amounts between \$251 thousand and \$1 million. This is indicative of the bank's commercial loan strategy, which emphasizes SBA lending rather than small business credit cards or lines of credit. Credit cards and credit lines generally result in smaller dollar amount loans.

Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

The bank's level of community development lending is excellent and it had a positive effect on the lending test. In addition to originating a high number and dollar amount of community development loans, the majority of these loans addressed the need for affordable rental housing in the assessment area. According to community contacts, affordable rental housing is a primary need in the Miami MSA.

During the evaluation period, TIBOM originated 46 community development loans totaling \$82.5 million. This dollar amount of community development lending is high. It equals 111% of the bank's Tier 1 Capital as of December 31, 2002. The majority of community development loans (80% by number and 78% by dollar) support affordable housing. TIBOM extended 37 loans totaling \$64.2 million to finance multi-family residential properties targeted to low- and moderate-income individuals. The loans represent at least 1,400 affordable rental housing units in the bank's assessment area.

Seven community development loans directed toward economic development efforts in the bank's assessment area totaled \$15.7 million. Economic development loans represent 15% of all community development loans by number and 19% by dollar. Economic development loans were extended to small businesses that created or retained permanent jobs for persons who are low- or moderate-income. Several of the small businesses are located in the Miami Federal Empowerment Zone. Employment opportunities, particularly for low- and moderate-income individuals, are another critical need in the bank's assessment area, as demonstrated by the city's empowerment zone designation.

The remaining two community development loans, totaling \$2.6 million, targeted revitalization and stabilization efforts in low-income geographies within the bank's assessment area. The loans financed the rehabilitation of two unoccupied businesses structures in the city's empowerment zone.

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.

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 Miami-Dade MSA is good. The dollar volume of community development investments is good. It represents 5.6% of Tier 1 Capital. The bank's community development investments have a positive impact on the assessment area, addressing the critical need of affordable housing identified by community contacts. Investments made during the evaluation period are not considered innovative or complex. Private investors routinely provide these types of qualified investments.

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

Current Period Investments: During the evaluation period, the bank originated five community development investments totaling \$3.6 million 4.9% of Tier 1 Capital. Four of these investments, representing virtually all the investment dollars, were in mortgage-backed securities, for which the collateral is mortgage loans to area 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 remaining investment was in a new consortium of South Florida banks that came together to form a Community Development Financial Institution ("CDFI"). The CDFI provides loan funds for the construction of affordable housing in the bank's assessment area. The bank has a binding commitment to make a second \$8 thousand investment in the CDFI in 2003, but it has not yet been funded. The bank's investments represent a positive impact on its assessment area as they help to meet the critical affordable housing needs in the Miami MSA.

Current Period Grants and Donations: During the evaluation period, the bank originated 16 grants and donations to eight community development organizations totaling \$21 thousand. These grants and donations were to organizations with a primary mission of providing community services to low- and moderate-income individuals and families.

Prior Period Investments: Prior to this evaluation period, two investments with a current book value of \$556 thousand were made in the bank's assessment area. These investments remain outstanding. The investments were in Taxable Increment Revenue Bonds to the Miami Beach Redevelopment Agency to finance the redevelopment of a moderate-income geography. The investment continues to help assist the Agency's redevelopment efforts.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated ("Low Satisfactory"). Based on a full-scope review, the bank's performance in the Miami-Dade MSA is adequate.

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.

The bank offers banking services through one location situated in a middle-income geography in their assessment area. The office is located in a commercial district reasonably accessible to geographies, businesses, and individuals of different income levels in the assessment area. The bank's business strategy is primarily directed toward business entities.

During the evaluation period, the office was moved from a middle-income geography in Miami's Central Business District to the commercial area of Coral Gables, a distance of approximately three miles. At the new location, the bank is able to provide drive-thru facilities and two ATMs, unavailable at the former location. The move had a neutral impact on the accessibility of the bank's services.

Alternative delivery systems enhance the bank's ability to deliver services to its primarily commercial customer base. The bank employs a cadre of business development officers who, on a regular basis, solicit assessment area businesses, make seminar presentations and attend trade shows. A network of mortgage brokers is used to provide home mortgage and multi-family lending opportunities.

TIBOM offers a full range of banking products and services in its assessment area, including a low-cost checking account designed for senior citizens and a website that provides some transactional services and general information about the bank and its products. The bank's services, including business hours, do not vary in a way that inconveniences low- and moderate-income geographies or individuals.

Community Development Services

Considering the level of staff participation and the number of organizations benefiting, the level of community development services provided by TIBOM is adequate. During the evaluation period, four officers provided technical assistance to five qualified community development organizations. The services provided are not innovative, but are responsive to assessment area needs.

For example, two officers serve on the credit committee or as directors of three organizations that provide financing for affordable housing and job training to low- and moderate-income

individuals. An executive officer was instrumental in the formation of a new loan consortium of area banks formed to finance affordable housing in the bank's assessment area. Also, two officers serve on the executive committee of two organizations that provide community services, including daycare and educational programs, to low- and moderate-income individuals.

Additionally, bank officers spoke at several seminars and workshops conducted by the SBA. Presentations focused on import/export financing and the loan application process.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): (1/1/2000 to 12/31/2002) Investment and Service Tests and CD Loans: (2/8/2000 to 4/14/2003)	
Financial Institution	Products Reviewed	
TIBOM Coral Gables, FL	Residential Home Purchases Multifamily Small Business	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Miami-Dade #5000	Full-Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Miami-Dade MSA.....	B-2
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Miami-Dade MSA

Demographic Information for Full-Scope Area: Miami-Dade MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	267	13.48	21.35	35.96	28.09	1.12
Population by Geography	1,937,094	9.18	19.43	39.47	31.91	0.01
Owner-Occupied Housing by Geography	376,006	3.26	12.86	40.83	43.05	0.00
Businesses by Geography	200,697	8.82	17.32	31.73	42.14	0.00
Farms by Geography	2,196	3.51	11.79	36.29	48.41	0.00
Family Distribution by Income Level	485,213	23.32	16.40	19.19	41.09	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	192,734	15.03	27.92	40.30	16.76	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$31,113 = \$45,600 =17.62%	Median Housing Value Unemployment Rate			100,570 =7 %	

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

The bank’s assessment area consists of all of the Miami-Dade MSA, which is equivalent to the boundaries of Miami-Dade County. The assessment area meets the requirements of the CRA regulation and does not arbitrarily exclude low- and moderate-income geographies. The table above provides demographic information about the assessment area.

The Miami-Dade MSA, Florida’s largest metropolitan area, is a densely populated urban center. According to the 1990 Census, the total population was approximately 2 million people, residing in a nearly 2 thousand square mile area. The 2002 Census shows the MSA population to be 2.3 million, a 16.3 percent increase. 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-Dade MSA, represents approximately 20 percent of the MSA population and 28 percent of the MSA census tracts. However, a disproportionately large portion of the City is categorized as low- and moderate-income with 62 percent of the MSA’s low- and moderate-income census tracts being located in the City. Based on the 1990 Census, the City of Miami is considered to have the 4th highest poverty rate among cities with a population of 100,000 or larger. Miami-Dade County overall has the 6th highest poverty rate among counties with a population of 500,000 or more.

Housing costs in the Miami-Dade MSA are high. For 2002, the National Association of Realtors estimated the median sales price of an existing single-family home in the Miami Metropolitan

area to be \$189,800. When compared with a HUD Adjusted Median Family Income of \$45,600 for 2002 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 Miami-Dade MSA'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 MSA agriculture is a major industry (e.g. tomatoes, citrus, and other vegetables).

Competition within the bank's assessment area is intense. FDIC data as of June 30, 2002 showed 433 banking offices of national and regional banks as well as community banks operating in the MSA. There were 463 HMDA reporters of home purchase loans in 2001 for the Miami-Dade MSA. The top ten lenders, with a 45 percent market share, were mortgage companies that operate nationally or subsidiaries of some the largest banks in the nation. National credit card lenders dominate the small business loan market. In 2001, the top five small business loan reporters were credit card companies that had a combined market share of 63 percent in the Miami-Dade MSA.

There are a wide range of opportunities for community development lending, investments, and services throughout the Miami-Dade MSA. 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 MSA include, but are not limited to, bond and tax credit purchases for low- and moderate-income housing, participation in numerous local 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.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

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

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

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

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

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

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

Table 1. Lending Volume

LENDING VOLUME		Geography: MIAMI-DADE MSA						Evaluation Period: January 1, 2000 TO December 31,2002				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Miami-Dade-MSA	100.00	193	107,004	128	50,292	0	0	46	82,500	367	239,796	100.00

Limited Review:

* 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 February 8, 2000 to April 14, 2003.
 *** Deposit Data as of June 30,2001. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: MIAMI-DADE MSA						Evaluation Period: January 1, 2000 TO December 31, 2002							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Miami-Dade MSA	117	100.00	3.26	3.42	12.86	4.27	40.83	8.55	43.05	83.76	0.10	0.06	0.02	0.02	0.17
Limited Review:															

* Based on 2001 Peer Mortgage Data: Southeast Region.
 ** 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.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: MIAMI-DADE MSA								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	Over all	Low	Mod	Mid	Upp
Full Review:															
Miami-Dade MSA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Limited Review:															

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE											Geography: MIAMI-DADE MSA					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	Over all	Low	Mod	Mid	Upp					
Full Review:																				
Miami-Dade MSA	11	100.0	3.26	0.00	12.86	9.09	40.83	27.27	43.05	63.64	0.01	0.00	0.00	0.01	0.01					
Limited Review:																				

* Based on 2001 Peer Mortgage Data: Southeast Region I
 ** 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.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY			Geography: MIAMI-DADE MSA						Evaluation Period: January 1, 2000 TO December 31, 2002						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Miami-Dade MSA	65	100.0	13.42	20.00	21.25	21.54	36.01	52.31	29.33	6.15	6.64	5.83	4.20	10.32	4.08
Limited Review:															

* Based on 2001 Peer Mortgage Data: Southeast Region I.

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

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: MIAMI-DADE MSA				Evaluation Period: January 1, 2000 TO December 31, 2002				
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	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
Full Review:																				
Miami-Dade MSA	128	100.0	8.82	9.38	17.32	15.63	31.73	28.13	42.14	46.88	0.07	0.17	0.05	0.06	0.08					
Limited Review:																				

* Based on 2001 Peer Small Business Data: US.

** 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 2002.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS												Geography: MIAMI-DADE MSA				Evaluation Period: January 1, 2000 TO December 31, 2002				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography									
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Miami-Dade MSA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
Limited Review:																				

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.
 *** Source Data - Dun and Bradstreet (Year).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE			Geography: MIAMI-DADE MSA					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						
	#	% of Total**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Over all	Low	Mod	Mid	Upp		
Full Review:																	
Miami-Dade MSA	117	100.0	23.32	0.00	16.40	0.00	19.19	4.41	41.09	95.59	0.07	0.00	0.00	0.02	0.12		

* Based on 2001 Peer Mortgage Data: Southeast Region I.
 ** As a percentage of loans with borrower income information available. No information was available for 41.88% of loans originated and purchased by Bank.
 *** Percentage of Families is based on the 1990 Census information.
 **** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: MIAMI-DADE MSA						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****	Over all	Low	Mod	Mid	Upp
Full Review:															
Miami-Dade MSA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Limited Review:															

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MIAMI-DADE MSA								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****	Over all	Low	Mod	Mid	Upp
Full Review:															
Miami-Dade MSA	11	100.0	23.32	0.00	16.40	22.22	19.19	22.22	41.09	55.56	0.01	0.00	0.02	0.00	0.01
Limited Review:															

* Based on 2001 Peer Mortgage Data: Southeast Region I.
 ** As a percentage of loans with borrower income information available. No information was available for 18.18% of loans originated and purchased by Bank.
 *** Percentage of Families is based on the 1990 Census information.
 **** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: MIAMI-DADE MSA			Evaluation Period: January 1, 2000 TO December 31, 2002	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Miami-Dade MSA	128	100.0	54.92	60.16	14.06	25.00	60.94	0.07	0.11
Limited Review:									

* Based on 2001 Peer Small Business Data: US.

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

**** 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.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: MIAMI-DADE MSA		Evaluation Period: January 1, 2000 TO December 31, 2002			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Miami-Dade MSA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Limited Review:									

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

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

**** 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 [Percentage] of small loans to farms originated and purchased by Bank.

Table 13. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MIAMI-DADE MSA				Evaluation Period: February 8, 2000 TO April 14, 2003			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Miami-Dade MSA	2	556	21	3,621	23	4,177	100.00	1	8
Limited Review:									

* '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.

Table 14. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MIAMI-DADE Evaluation Period: February 8, 2000 TO April 14, 2003																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Miami-Dade MSA	100.00	1	100	0.00	0.00	100	0.00	1	1	0	0	0	0	9.18	19.43	39.47	31.91
Limited Review:																	

