

PUBLIC DISCLOSURE

March 5, 2001

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Fifth Third Bank of Florida
RSSD Number: 1390342

4099 Tamiami Trail North
Naples, Florida 33941

FEDERAL RESERVE BANK OF ATLANTA
1000 PEACHTREE STREET, N.E.
ATLANTA, GEORGIA 30309-4470

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, nor should it 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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INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: Satisfactory

The following table indicates the performance level of Fifth Third Bank of Florida with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	FifthThird Bank of Florida		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory			
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			

*Note: The lending test is weighted more heavily than the investment and service tests in determining the overall rating.

The major factors supporting the institution's rating include:

- Overall adequate responsiveness to community credit needs.
- A substantial majority of small business and HMDA loans are originated in the bank's assessment areas.
- Adequate record of lending to borrowers of different income levels and businesses of various revenue sizes.
- Adequate record of lending in low- and moderate-income census tracts.
- Good level of community development loans.
- Excellent level of qualified investments
- Reasonably accessible retail branches and an adequate level of community development services.

DESCRIPTION OF INSTITUTION

Fifth Third Bank of Florida ("FTB") is headquartered in Naples, Florida, and operates 10 facilities throughout Collier County, Florida, and portions of Lee County, Florida. FTB began operations with one facility in Collier County, Florida in 1994. Since the previous examination, FTB amended its Ft. Myers assessment area from all of Lee County to a certain portion of Lee County (excludes North Fort Myers).

FTB is a subsidiary of Fifth Third Bancorp, which is headquartered in Cincinnati, Ohio. Fifth Third Bancorp is a \$46 billion financial holding company, which places its assets among the 30 largest holding companies in the country and among the 15 largest in market capitalization. In addition to Fifth Third Bank of Florida, Fifth Third Bancorp owns five bank subsidiaries and one thrift with operations in Arizona, Illinois, Indiana, Kentucky, Ohio, and Michigan. Fifth Third Bancorp also owns non-bank subsidiaries, including a community development corporation, insurance company, and an ATM network service provider.

FTB reported assets of \$355.7 million as of December 31, 2000. In comparison, the bank had total assets of \$344.0 million and \$239.9 million, respectively, as of December 31, 1999 and December 31, 1998. Most of the bank's increase in assets occurred in its investment portfolio.

While FTB offers a range of commercial and retail banking products and services, including small business lending, direct consumer lending, home equity lending, and credit card lending, the bank considers itself a small business lender. Beginning in 2000, FTB ceased originating first lien consumer mortgage transactions. All request for these loans, except in rare circumstances, are handled by Fifth Third Mortgage Company, a wholly-owned subsidiary of Fifth Third Bank, Ohio.

As of December 31, 2000, FTB had \$201.5 million in loans outstanding. As of the same time period in 1999 and 1998, the bank had \$254.4 million and \$189.6 million in loans outstanding, respectively. Most of the decrease in the portfolio occurred in loans secured by one-to-four family dwellings. In 2000, FTB sold most of its first lien consumer mortgages to Fifth Third Mortgage Company, a subsidiary of Fifth Third Bank, Ohio. Some increase in the bank's loan portfolio occurred in loans secured by commercial real estate and commercial and industrial loans, which was expected since the bank has a primary lending focus on small business lending.

Since the previous examination, FTB has advertised its willingness to originate loans to all qualified individuals, regardless of income or geographical location within its assessment area. Advertisements have marketed the bank as a lender of mortgage loans, as well as consumer and small business loans. The bank has used widely circulated media for advertising its credit products.

FTB competes with many financial institutions in Collier and Lee Counties. Several represent multi-regional or national institutions with assets of \$1 billion or greater. A detailed listing of specific financial institutions is listed within the respective assessment area discussions later in the report. As of June 30, 2000, 44 financial institutions operated 263 banking offices in Collier and Lee Counties. The number of offices operated by one entity ranged from one to 54 offices. FTB operates ten banking offices in Collier and Lee Counties. According to the June 30, 2000 market share report from the FDIC, FTB ranked eleventh in its market share of deposits in its Collier and Lee Counties, which was 2.6%.

The following chart includes key financial ratios regarding the FTB's operations.

Key Financial Ratios As of December 31, 2000	
Return of Average Assets	1.7%
Net Loans & Leases to Average Assets	58.3%
Investments to Average Assets	36.4%
Total Deposits to Average Assets	83.6%
Net Loans & Leases to Total Deposits	68.7%
1-4 Family Residential Loans to Average Loans	17.7%
Consumer Loans to Average Loans	8.3%
Commercial Loans to Average Loans	62.9%
Agricultural Loans to Average Loans	0.02%

Based on FTB's assets size and financial condition, it has the ability to meet the credit needs of its assessment areas. There are no legal or other impediments that would hamper the bank's ability to meet the community's credit needs. FTB was rated "Satisfactory" at the previous CRA examination dated March 8, 1999. The components of the previous rating were low satisfactory in the lending test, low satisfactory in the investment test, and low satisfactory in the service test.

SCOPE OF EXAMINATION

Loans subject to the reporting requirements of the Home Mortgage Disclosure Act (HMDA) and Community Reinvestment Act were reviewed at this examination. HMDA product types included home purchase, home improvement, and home refinance loans. CRA product types included small loans to businesses, small loans to farms, and community development loans. At FTB's option, consumer loans (which include home equity, loans secured by automobiles, other secured, other unsecured credit card loans, and small loans to businesses secured by residential real estate) were reviewed. Also, HMDA loans originated or purchased by the bank's affiliate, Fifth Third Mortgage Company, were also included as a part of the lending test analysis. Unless otherwise noted, the review period of data, including service and investment test data, is January 1, 1999 through December 31, 2000.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

LENDING TEST

The bank's performance under the lending test is low satisfactory.

Lending Activity

Considering the bank's asset size, competition in the market, number of banking offices, and the bank's performance at the previous examination (which included 1997 and 1998 data), lending levels reflect adequate responsiveness to assessment area credit needs. During the current examination, the bank originated 2,661 loans totaling \$231.4 million. At the previous examination, the bank originated or purchased 1,363 loans totaling \$230.7 million. While there was a significant increase in the number of loans, only a moderate increase in lending to low-and moderate-income borrowers and geographies was noted. In relation to HMDA-related loans, the bank originated 1,064 loans totaling \$164.3 million. At the previous examination, the bank originated 760 HMDA related loans totaling \$141.2 million.

Regarding small business loans, the bank originated 393 loans totaling \$55.0 million during the current examination period as compared to 266 loans totaling \$37.2 million at the previous examination. According to community contacts, affordable housing and small business financing were primary credit needs. The tables on the following page display the bank's lending activity for years 1999 and 2000 by product type.

Total Lending Activity

Fifth Third Bank of Florida and Affiliates

January 1, 1999 to December 31, 1999

	# of Loans	\$ ('000s)
Home Mortgage Loans	503	\$78,138
Consumer Loans*	595	\$7,745
Small Loans to Business	182	\$26,774
Small Loans to Farms*	0	0
TOTALS	1280	\$112,657

Total Lending Activity

Fifth Third Bank of Florida and Affiliates

January 1, 2000 to December 31, 2000

	# of Loans	\$ ('000s)
Home Mortgage Loans	561	\$86,218
Consumer Loans*	608	\$4,107
Small Loans to Business	211	\$28,224
Small Loans to Farms*	1	\$200
TOTALS	1381	\$118,749

Assessment Area Concentration

A substantial majority of the bank's lending occurred inside its assessment areas. The tables on the following pages show, by loan type, the number and percentage of loans that were located inside and outside the bank's assessment areas for 1999 and 2000.

Assessment Area Lending

Fifth Third Bank of Florida

January 1, 1999, to December 31, 1999

	INSIDE ASSESSMENT AREA				OUTSIDE ASSESSMENT AREA			
	#	%	\$ (000)	%	#	%	\$ (000)	%
Home Mortgage Loans	496	94.1	\$ 77,395	93.1	31	5.9%	\$5,739	6.9
Consumer Loans	595	83.5	\$ 7,745	86.9	117	16.5	\$1,160	13.1
Small Loans to Businesses	182	95.3	\$ 26,774	88.3	9	4.7	\$3,540	11.7
Small Loans to Farms*	0	0.0	\$0	0.0	0	0.0	\$0	0.0
TOTALS	1273	89.0	\$111,914	91.5	157	11.0	\$10,439	8.5

Assessment Area Lending

Fifth Third Bank of Florida

January 1, 2000, to December 31, 2000

	INSIDE ASSESSMENT AREA				OUTSIDE ASSESSMENT AREA			
	#	%	\$ (000)	%	#	%	\$ (000)	%
Home Mortgage Loans	47	88.7	\$4,096	93.2	6	11.3	\$301	6.8
Consumer Loans	608	85.0	\$4,107	82.2	107	15.0	890	17.8
Small Loans to Businesses	211	94.2	\$28,281	92.8	13	5.8	\$2,183	7.2
Small Loans to Farms*	1	100.0	\$200	100.0	0	0.0	\$0	0.0
TOTALS	867	87.3	\$36,684	91.6	126	12.7	\$3,374	8.4

As indicated by the tables, 89% and 87% of the bank's lending, by number of loans, was inside its assessment areas in 1999 and 2000, respectively. However, a slight decrease in the percentage of total loans originated inside the bank's assessment area occurred between 1999 and 2000. For 1999 and 2000 combined, 88.3% of the bank's loans by number and 91.5% of the loans by dollar volume were originated inside the bank's assessment areas. At the previous examination, which included years 1997 and 1998, the bank originated 93.6% of the loans by number and 92.1% of the dollar volume of loans inside the bank's assessment areas.

Geographic Distribution

FTB's performance, with regard to the geographic distribution of loans, is adequate. Low levels of lending in low- and moderate-income geographies were noted in the Naples and Ft. Myers assessment areas. The lack of lending is primarily due to the lack of applications from these areas. The analysis of small business and HMDA lending within each assessment area is discussed in greater detail later in the report. This conclusion was based upon the bank's performance in each assessment area, in comparison to demographic and aggregate lending data for small business and HMDA lending, as well as the bank's performance at the previous examination.

Borrower Distribution

Small business lending to businesses of different revenue sizes, and HMDA and consumer lending to borrowers of different income levels are adequate. This conclusion was based upon the bank's performance in each assessment area, in comparison to demographic data and aggregate lending data for small business and HMDA lending, and the bank's performance at the previous evaluation. The analysis of small business and HMDA lending within each assessment area is discussed in greater detail later in the report.

FTB makes limited use of flexible lending practices in serving assessment area credit needs for low- and moderate-income borrowers. According to management, the bank prides itself in extending loans that are outside traditional underwriting guidelines in order to assist homebuyers in purchasing a home. The bank offers a loan program specifically designed to offer flexible underwriting guidelines for low- and moderate-income borrowers. The Good Neighbor mortgage loan program is for individuals who do not qualify for traditional mortgage loan programs offered by the bank. The program utilizes flexible loan underwriting criteria, such as higher debt-to-income and loan-to-value ratios. The program offers low- to moderate-income individuals the opportunity to purchase or construct a home with a small down payment and lower monthly payments because the bank waives private mortgage insurance (PMI) requirements. Additionally, this program is available to individuals wishing to refinance rehabilitation expenses of at least \$7,500. During the review period, the bank closed loans totaling \$1.7 million under the Good Neighbor Mortgage program.

Community Development Lending

FTB originates a good level of community development loans. Since the previous examination, the bank originated eight community development loans totaling \$6.5 million. Most of the bank's community development loans were originated in state, county, or city designated development or redevelopment zones and supported economic development (creation of jobs for low- and moderate-income persons). A more in-depth description of the community development loans in each assessment area is discussed in greater detail later in the report.

INVESTMENT TEST

The bank's performance under the investment test is outstanding. Since the previous examination, the bank financed the development of a 104-unit complex in Collier County for low- and moderate-income families through the purchase of a \$1.5 million LIHTC. Of the \$1.5 million LIHTC, \$765,000 has been funded. According to the Florida Housing Corporation, this was the only LIHTC project available for participation in the bank's assessment areas in 1999 and 2000. Other investments include grants and contributions totaling \$46,900 to various nonprofit organizations. Also, the bank donated two computers (with free internet access) valued at \$4,850 to a nonprofit organization in its assessment areas. Most of the bank's investments have been responsive to community development needs and are not routinely provided by private investors. The bank's assessment areas are unique in that there have not been an abundance of investments in its market that would meet the definition of community development. Community contacts indicated that the market for qualified investments is highly competitive and that typically many investments are rewarded based on prior relationship between the investor and the financial institution. The contact also stated that it takes a long time to

develop relationships with these investors before they will even consider the financial institution as an option for funding the investment.

SERVICE TEST

The bank's performance under the service test is low satisfactory. FTB operates ten banking facilities throughout its assessment areas. The bank has no banking offices or ATMs in low- or moderate-income census tracts. However, banking offices in middle- and upper-income census tracts are within a reasonable distance (approximately two to four miles) of most low- and moderate-income tracts. While the bank offers alternative systems for delivering retail banking services, no information was provided indicating that these systems were effective alternatives in providing services to low- and moderate-income individuals or areas as well as to small business owners. These systems include ATMs and telephone banking. The bank offers its customers accessibility to banking services through the use of Publix's Presto ATMs and they are not charged a fee. Currently, there are 17 Presto ATMs in Collier County and 15 in Lee County. However, the use of these ATMs does not provide customers accessibility to loan services and products.

The bank also offers telephone banking. Customers can call to verify account balances, and determine what checks have cleared their deposit accounts and transfer funds from their accounts. Customers may also pay bills over the telephone by using their Jeanie ATM card PIN. The bank charges a fee for this service. While telephone banking is offered to all customers, bank management could not demonstrate how effective the system had been in serving the needs of low- and moderate-income persons, businesses, and census tracts.

To accommodate the Hispanic population in its assessment areas, FTB offers savings and checking brochures in Spanish. In addition, a bilingual employee is placed at each of the banking centers to assist the Hispanic community with their banking needs.

Since the previous examination, the bank has opened five banking offices and consolidated one office into an existing banking office. Two offices were opened in the Naples assessment area and three offices were opened in the Ft. Myers assessment area. Banking hours and services are basically the same for all banking offices throughout the bank's assessment areas. Bank management and staff participate in an adequate level of community development services. Many of the services provided are related to affordable housing and improvement in quality of life for low- and moderate-income families. Community development services unique to the individual assessment area are discussed in greater details later in the report. Community development services benefiting both assessment areas are discussed below.

A unique program that is offered by FTB is its Employee Benefit Banking program. Under this program, FTB offers free checking to all employees of companies to which it provides banking services. In addition, FTB management conducts meetings at these companies for their employees. Services of a bilingual staff member are available at each of the meetings to present information in Spanish. The bank provides financial information and services to the employees including, but not limited to, information regarding first time homebuyer programs, mortgage pre-qualification, and investments. Most of the employees benefited by this service are low- and moderate-income persons.

The bank has also partnered with Lowe's stores to provide banking services to its communities. The bank has weekend booths at the stores with information regarding the services offered by FTB. Checking accounts can be opened and loan applications are available. Information regarding the number of loan applications received and deposit accounts opened was not available.

COMPLIANCE WITH ANTIDISCRIMINATION LAWS

FTB solicits applications from all segments of its communities, including low- and moderate-income areas. The bank's policies and internal control procedures are adequate to ensure that the

evaluation of credit applications is based solely on financial and economic considerations. The bank has adopted an antidiscrimination policy. No evidence of prohibited discrimination or other illegal credit practices was noted during the examination. The bank is in compliance with the substantive provisions of antidiscrimination laws and regulations. Lending staff has received fair lending training since the previous examination.

METROPOLITAN AREAS

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NAPLES MSA, FLORIDA

This assessment area consists of Collier County, Florida, which is also in the Naples MSA. Within the assessment area, there are two low-income census tracts, four moderate-income census tracts, 13 middle-income census tracts, and 12 upper-income census tracts.

INSTITUTION'S OPERATIONS

FTB operates six banking offices in this assessment area, which represents 60% of the bank's total banking offices. This assessment area accounts for 55% of the bank's lending by number of loans and 52% of the bank's deposits.

PERFORMANCE CONTEXT

Collier County is located on the Southwest coast of Florida. With a total area of 2,305 square miles and a land area of 2,025 square miles, Collier County is the largest county in Florida. The Naples MSA, which includes all of Collier County, continues to be one of the fastest growing metropolitan markets in the United States. According to the U.S. Census Bureau, Naples was the fifth fastest growing metropolitan area in the U.S. between 1990 and 1998, and was the only metropolitan area in Florida listed in the top ten. Incorporated cities in the MSA include Naples, Everglades City, and City of Marco Island. Planning communities within Collier County includes North Naples, Golden Gate, East Naples, South Naples, Big Cypress, Corkscrew, Urban Estates, Rural Estates, Marco, Central Naples, Royal Fakapalm, and Immokalee.

The chart on the following page provides some demographic information according to the 1990 Census for the Naples assessment area.

Demographics and Economics of the Naples MSA Assessment Area	
<i>Assessment Area Population based off 1990 census</i>	152,099
<i>Population in the State of Florida</i>	12,937,926
<i>Assessment Area Population as a % of State's population</i>	1.2%
<u>MSA Median Family Income:</u>	
<i>1990 Median Family Income for Assessment Area</i>	\$38,428
<i>1990 Median Family Income for State of Florida</i>	\$32,212
<u>Percentage of Families by Income Level of Families:</u>	
<i>Low-Income</i>	17.8%
<i>Moderate-Income</i>	20.0%
<i>Middle-Income</i>	22.9%
<i>Upper-Income</i>	39.3%
<i>Poverty Level</i>	6.4%
<u>Number of Total Housing Units:</u>	
<i>1-4 Family Residential</i>	48,351
<i>Multi-Family</i>	34,926
<i>Mobile Home or Trailer</i>	10,155
<i>Other</i>	733
<i>Owner-Occupied Housing Units</i>	43,319
<i>Rental Housing Units</i>	22,046
<i>Vacant Housing Units</i>	32,462
<u>Percentage of Total Housing Units:</u>	
<i>1-4 Family Residential</i>	51.3%
<i>Multi-Family</i>	37.1%
<i>Mobile Home or Trailer</i>	10.8%
<i>Other</i>	0.8%
<i>Owner-Occupied Housing Units</i>	46.0%
<i>Rental Housing Units</i>	23.4%
<i>Vacant Housing Units</i>	34.5%
<u>Median Housing Characteristics:</u>	
<i>Median Age in Years</i>	13 Yrs.
<i>Median Home Value</i>	\$163,125
<i>Median Gross Rent</i>	\$593

Demographic Characteristics

According to estimated population figures from the University of Florida, Bureau of Economic and Business Research, the 1999 estimated population of Collier County was 219,685 in 1999, which was 1.4% of the state of Florida's population at 15,322,040. Between 1990 and 1999, the assessment area population grew by 40%. Collier County's population rises by an estimated one-third during the winter season, which traditionally lasts from November through April. This is the time of year that Collier County's seasonal residents and visitors return. According to the 1990 Census, 23% (34,456)

of the population are 65 years of age or older. The median age of the population in Collier County is 43.4 years, as compared to 38.4 years for the state of Florida and 34.9 years for the U.S.

Income Characteristics

The 1990 median family income for the assessment area is 19% higher than the median family income for the state of Florida. The HUD adjusted median family incomes for 1999 and 2000 were \$59,100 for both years. Collier County's HUD adjusted median family income is the highest in the state of Florida and higher than the median family income for the U.S. Based on the 1990 census, of the 31 tracts in the assessment area, 6.5% are low-income and 12.9% are moderate-income.

Within the assessment area, there are 61,646 households and 44,136 families. Of the 44,136 families, 17.8% are low-income families and 20.0% are moderate-income families, which 6.4% (2,829) of the total families have incomes below the poverty level. According to the director of HUD in Collier County, 40% of the population are wage earners. The remaining 60% of the population receive their income from retirement funds, investments, or other means. The average wage has increased from \$17,758 in 1990 to \$28,400 in 2000. It is difficult for the average wage earner to purchase a single family dwelling in Collier County on wages alone.

Housing Characteristics

As of 1990, there were 94,165 housing units, which 51.3% were one-to-four family units, 37.1% were five or more family units, 10.8% were mobile homes, and 0.8% were other units, including boarded-up units.

Of the housing units in the assessment area, 46.0% were owner-occupied. According to the 1990 Census, 510 owner-occupied units were located in low-income census tracts. In addition, community contacts indicate that little or no construction of housing has occurred in these tracts, thereby limiting the amount of lending activity that can occur in these areas. It is also interesting to note that 55.2% of the housing units in moderate-income census tracts are mobile homes. Most of the mobile homes are winter homes for retirees from the northern United States or homes for the farm workers in northwest Collier County.

The median age of the housing stock was 13 years, compared to the median age of 15 years for the state of Florida. The median value of owner-occupied housing in the assessment area was \$163,125. The following table shows the average selling price of housing units in Collier County from 1995 through 1999. The source for this information is the Collier County Property Appraiser.

Year	Average Single Family Sales Price	Average Condo Sales Price	Average Co-Op Sales Price	Average Mobile Home Sales Price
1995	\$158,512	\$183,862	\$113,172	\$40,008
1996	\$189,994	\$192,356	\$138,143	\$41,314
1997	\$221,541	\$197,151	\$104,526	\$44,508
1998	\$252,328	\$216,697	\$99,930	\$47,063
1999	\$277,699	\$221,457	\$108,690	\$52,142

The average sale price of a single-family unit increased by 75% between 1995 and 2000. The average sale price for a condominium and mobile home increased by 20% and 30%, respectively, during the same time period. Considering the average sales price of housing in 1999, most low- and moderate-income families cannot afford to purchase a single family dwelling or condominium in Collier County. The most affordable housing unit is the mobile home; however, the number of mobile homes

sold between 1995 and 1999 ranged from 171 to 201, which was far below the need of affordable housing units in Collier County. In 1999, 8% of the single-family dwellings and 18% of the condominiums had sales prices of \$80,000 or less. As indicated in the chart below, the number of sales of single family homes under \$80,000 has drastically decreased from 1993 to 1999, and the number of sales of single family homes over \$250,000 has drastically increased from 1993 to 1999.

Year	Sales < \$80,000	Sales > \$250,000
1993	1383	495
1994	1400	559
1995	1599	623
1996	1721	905
1997	1334	1143
1998	781	1422
1999	428	1547

In addition to the unaffordability of homes, land and closing costs associated with home purchase loans are very expensive thereby hampering many low- and moderate-income families from purchasing a single-family dwelling. According to the director of HUD in Collier County, impact fees are \$7,200 for new construction of single family dwellings.

Many rental units in the Naples assessment area are also unaffordable to low-income borrowers. According to a study conducted by the U.S. Department of Housing and Urban Development, the average market rent is \$612 for a 1-bedroom apartment, \$736 for a 2-bedroom apartment, \$1,024 for a 3-bedroom apartment, and \$1,141 for a 4-bedroom apartment.

Labor, Employment and Economic Characteristics

The labor force in Collier County grew an average of 3.2% since 1990, adding an average of 2,300 workers each year. According to DRI/McGraw Hill (August 1998), the Naples MSA was considered as one of the top five markets for projected employment growth for the time period of 1997 – 2002. The 1999 unemployment rate for Collier County was 3.8% as compared to 3.9% for the state of Florida, and 4.2% for the U.S. The following chart depicts employment by industry in Collier County for 1998.

Industry	Percent of Total Employment
Services	33
Retail Trade	23
Construction	11
Government	10
Agriculture	8
Finance, Insurance, and Real Estate	6
Wholesale Trade	3
Manufacturing	3
Transportation and Public Utilities	3

According to the Florida Department of Labor and Employment Security, the fastest growing industries between 1990 and 1998 have been wholesale trade (79%), services (55%), retail trade (39%), government (30%), and construction (30%). Emerging industries in Collier County include health technology, aviation and aerospace, and software development technologies. There are 22 industrial and commerce parks throughout Collier County.

Average wages from private industries in Collier County has increase by 49% from \$17,758 in 1990 to \$28,400 in 1998. Average wages increased by 34% for the state of Florida and 36% for the U.S. However, wages are not high enough for most working class individuals and families to purchase a single-family housing unit in Collier County.

Competition

As of June 30, 2000, 32 financial institutions, with 107 banking offices, were operating in Collier County. Total deposits of the 32 financial institutions equaled \$4.6 billion. Asset size of these entities range from approximately \$20 million to over \$100 billion. FTB ranks eighth in deposit market share (3.5%). FTB operates six offices in the assessment area, which represents 9.1% of the total banking offices in the assessment area. Offices operated by an individual entity range from 1 to 19 offices. Product competition among the financial institutions is very strong. Many banks offer flexible and innovative mortgage and small business loan products with extended terms, no private mortgage insurance, no closing costs, etc. While FTB does not offer as many innovative and flexible lending programs as the larger banks, FTB does offer a 30 year fixed rate mortgage loan with no PMI (a designated product for low- and moderate-income borrowers) through its affiliate mortgage company. FTB also offers Small Business Administration (SBA) guaranteed loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NAPLES MSA

LENDING TEST

The bank's performance under the lending test is adequate.

Lending Activity

Considering the bank's market share of deposits, product offerings, and branch networking system as a percent of total branches in the assessment area, lending levels reflect adequate responsiveness to assessment area credit needs. Lending in the Naples assessment area represented the largest portion of the bank's overall lending activity. FTB maintains a 3.5% deposit market share in the Naples assessment area. Of the 182 small business loans made by FTB in 1999, 117 loans (64%) totaling \$19.8 million were originated in the Naples assessment area. According to the 1999 CRA aggregate disclosure statement for the Naples MSA, FTB ranked 9th among 101 reporting lenders in the origination of small business loans. Of the total small business loans originated in the Naples assessment area, FTB had a market share of 2.6%. Of the 213 small business loans made by FTB in 2000, 95 (46%) were originations in the Naples assessment area. Overall, the bank originated 212 small business loans in the Naples assessment area as compared to 207 small business loans at the previous evaluation for years 1997 and 1998.

Of the 513 HMDA loans originated by FTB in 1999, 349 loans (68%) totaling \$59.5 million were originations in the Naples assessment area. Of the 349 HMDA loans, 232 (66%) were home purchase loans, 96 (27%) were home refinance loans, and 21 (7%) were home improvement loans. According to HMDA aggregate data, FTB ranked fifteenth among 476 lenders with a market share of 2.0% in the origination of HMDA loans in the Naples assessment area. Of the 561 HMDA loans originated by FTB in 2000, 255 loans (45%) totaling \$49.0 million were originated in the Naples assessment area. Of the 255 loans, 222 (87%) were home purchase loans, 6 (2%) were home improvement loans, and 26 (10%) were home refinance loans. Also, the bank originated one multi-family loan. Overall, the bank originated 604 HMDA related loans in the Naples assessment area in 1999 and 2000. At the previous examination, the bank originated 554 HMDA related loans in 1997 and 1998.

Of the 1203 consumer loans originated by FTB in 1999 and 2000, 636 (52.8%) were in the Naples assessment area. The majority of the loans originated were home equity and motor vehicles loans.

Geographic Distribution

For this analysis, the geographic distribution of small business and HMDA lending was compared with the demographic information available. Performance context issues were also considered as well as the performance of other banks and FTB's performance at the previous examination. FTB's

performance in extending loans in all geographies, including low- and moderate-income census tracts, is adequate.

FTB did not originate any small business loans in low-income census tracts in 1999 and 2000 in the Naples assessment area. These tracts contain 1.5% of the small businesses in the assessment area.

Aggregate lending data indicates that the market originated less than one percent of its small business loans in these tracts.

Moderate-income tracts contain 4.4% of small businesses. Aggregate lending data for 1999 indicates that the market originated 2.9% of its small business loans in moderate-income census tracts in 1999.

The bank originated 1.7% of its small business lending in moderate-income census tracts in 1999. In 2000, the bank originated 3.2% of its small business loans in moderate-income census tracts.

Overall, the bank originated 2.3% of its small business loans in low- and moderate-income geographies. The following table displays the geographic distribution of the bank's small business loans in low- and moderate-income geographies at the previous evaluation (years 1997 and 1998) and the current evaluation (years 1999 and 2000). As indicated in the following table, the bank's performance did not improve in low-income census tracts, but significant improvement was noted in moderate-income census tracts.

Income Level of Census Tract	Previous Evaluation Dated March 8, 1999		Current Evaluation Dated March 5, 2001	
	1997	1998	1999	2000
	% of Loans	% of Loans	% of Loans	% of Loans
Low-Income	0.0	0.0	0.0	0.0
Moderate-Income	2.0	1.0	1.7	3.2

The percentage of FTB's 1999 and 2000 HMDA lending in the Naples assessment area in low-income tracts is below the percentage of owner-occupied units in these tracts. FTB did not originate any home purchase loans in low-income census tracts in 1999 and 2000. FTB did not receive any home purchase applications from residents of low-income census tracts, which contain 1.2% of the owner-occupied units in the assessment area. Aggregate lending data indicates that the market originated only 0.1% of its home purchase loans in low-income census tracts. According to community contacts, the lack of lending in these tracts is attributed to the lack of owner-occupied units for sale and the lack of construction of single family dwellings in these tracts.

FTB originated 1.3% of its home purchase loans in moderate-income tracts in 1999, which is very low compared to aggregate. Aggregate lending data for 1999 indicates that the market originated 3.5% of its home purchase loans in moderate-income census tracts. The bank's market share of home purchase loans in 1999 was 2.0%, with negligible market share in low-income census tracts and a market share of .1% in moderate-income census tracts. In 2000, FTB originated 1.8% of its home purchase loans in moderate-income census tracts.

FTB did not originate any home improvement loans in low- or moderate-income census tracts in 1999 or 2000 in the Naples assessment area. In 1999, the bank did not receive any home improvement loan applications from low or moderate-income census tracts. In 2000, it received only one home improvement loan application from a moderate-income census tract and none from low-income census tracts. According to 1999 aggregate HMDA lending data, the market originated 2.1% and 8.1% of its home improvement loans, respectively, in low- and moderate-income census tracts. While the bank did not originate any home improvement loans, the bank did originate four consumer home equity loans in moderate-income census tracts in 1999 and 2000.

In 1999, FTB did not receive any home refinance loan applications from low-income census tracts. Aggregate lending data shows that the market originated less than one percent of its home refinance loans in low-income census tracts. Also, in 2000, the bank did not receive any home refinance loan applications from low-income census tracts.

In 1999, FTB originated one percent of its home refinance loans in moderate-income census tracts. FTB received only one home refinance application from moderate-income tracts in 1999. Aggregate lending data shows that the market originated 3.2% of its home refinance loans in moderate-income census tracts. In 2000, the bank received no home refinance loan applications from moderate-income census tracts.

The table below displays the bank's performance at the previous evaluation for years 1997 and 1998 as compared to the bank's current performance for 1999 and 2000. As indicated in the table, the bank's performance level in the origination of home purchase loans in moderate-income tracts, which was identified as a primary credit need, has improved. Little change in performance was noted in the origination of home improvement and home refinance loans.

Income Level of Census Tract	Previous Evaluation Dated March 8, 1999		Current Evaluation Dated March 5, 2001	
	1997	1998	1999	2000
	% of Loans	% of Loans	% of Loans	% of Loans
Home Purchase				
Low-Income	0.0	0.0	0.0	0.0
Moderate-Income	0.0	1.2	1.3	1.8
Home Improvement				
Low-Income	0.0	0.0	0.0	0.0
Moderate-Income	0.0	0.0	0.0	0.0
Home Refinance				
Low-Income	0.0	0.0	0.0	0.0
Moderate-Income	1.6	0.0	1.0	0.0

According to Table 13 in Appendix C for 1999 and 2000, the percentage of consumer loans originated by FTB in low-income census tracts was significantly below the percentage of households in these tracts. Also, according to Table 13 in Appendix C for 1999 and 2000, the percentage of consumer loans originated by FTB in moderate-income census tracts was significantly below the percentage of households in these tracts. These low lending levels can be attributed to high poverty levels in these tracts.

Distribution by Borrower Income and Revenue Size of Business or Farm

For this analysis, the distribution of small business lending by business revenue sizes and HMDA lending by borrower income levels was compared with available demographic information. Performance context issues were also considered, as well as the performance of other banks, and FTB's performance at the previous examination. The distribution of loans, by borrower's income and revenue size of businesses, is adequate.

In 1999, 117 small business loans were originated in the Naples assessment area, which 55.6% were extended to businesses with revenues of \$1 million or less. In comparison, 87.8% of the businesses in the assessment area have annual revenues of \$1 million or less. According to aggregate small business lending data, 57.8% of its small business loans were to small businesses. According to a community contact, many of the small businesses do not go to banks for small business loans because the owners are independently wealthy or they know private investors who can provide the funds needed for their business. Of the 117 small business loans, 72 (61.5%) were in amounts of \$100,000 or less. According to aggregate small business lending data, 89.1% of the small business loans were in amounts of \$100,000 or less.

In 2000, 95 small business loans were originated in the Naples assessment area, which 65.2% were extended to small businesses. In addition, 69 of the 95 small business loans were originated in amounts of \$100,000 or less. The following table displays the bank's performance in 1997 and 1998, as compared to its performance in 1999 and 2000. As indicated in the table, the bank's percentage of loans to small businesses has improved since the previous evaluation while the percentage of loans in amounts less than \$100,000 basically did not change.

	Previous Evaluation Dated March 8, 1999		Current Evaluation Dated March 5, 2001	
	1997	1998	1999	2000
	% of Loans	% of Loans	% of Loans	% of Loans
% of Loans to Small Businesses	41.6	51.0	55.6	65.2
Small Business Loans <\$100,000	72.3	62.5	61.5	72.6

Home purchase lending to low-income borrowers is excellent. Low-income families represent 17.8% of families in the Naples assessment area, and 10.9% of the bank's HMDA loans in 1999 were originated to low-income borrowers. A possible reason for the lending disparity between the demographics and the bank's lending levels is the percentage of applications received from low-income applicants in the Naples assessment area. Low-income applicants submitted 11.0% of the home purchase loan applications in 1999. 1999 aggregate HMDA lending data indicates that the bank outperformed the market, which originated only 7.7% of its home purchase loans to low-income borrowers. In 1999, the bank had an overall market share of 2.4% of the home purchase loans. Its market share of home purchase loans to low-income borrowers was 3.3%. In 2000, the bank originated 5.4% of its home purchase loans to low-income borrowers, whereas low-income applicants submitted 6.0% of the home purchase applications.

Home purchase lending to moderate-income borrowers is poor. Moderate-income borrowers received 10.0% of the HMDA loans in 1999 and moderate-income families comprised 20.0% of total families in the Naples assessment area. 1999 aggregate HMDA lending data indicates that the bank performed significantly below the market, which originated 19.1% of its HMDA loans to moderate-income applicants. The bank's market share of home purchase loans to moderate-income borrowers was 1.2% as compared to an overall market share of 2.4% for home purchase loans. Moderate-income applicants submitted only 11.0% of the home purchase applications. Also, according to community contacts, many institutions in the Naples market use brokers to seek out applications from this segment of the market. FTB does not use brokers because of the fees the applicants would incur. In 2000, the bank originated 16.8% of its home purchase loans to moderate-income borrowers. Moderate-income borrowers submitted 16% of the home purchase applications in 2000. Home purchase lending to middle- and upper-income borrowers was good.

The bank's level of home improvement lending to low-income borrowers is adequate. In 1999, the bank originated 21 home improvement loans, which 14.3% were to low-income borrowers. Low-income families comprise 17.8% of the total families. In 1999, low-income applicants submitted 13.0% of the home improvement applications. The bank's percentage of loans to low-income borrowers is slightly below the 1999 aggregate's percentage of home improvement loans (14.9%) to these borrowers. In 1999, FTB had an overall market share of 4.1% of the home improvement loans. Its market share of home improvement loans to low-income borrowers was 3.9% in 1999. In 2000, the bank originated six home improvement loans, which 33.3% were to low-income borrowers. In 2000, low-income applicants submitted five home improvement applications, which accounted for 31% of total home improvement loan applications.

The bank's level of home improvement lending to moderate-income borrowers is poor. In 1999, the bank originated 14.3% of its home improvement loans to moderate-income borrowers. Moderate-income families comprise 20.0% of the total families. In 1999, moderate-income applicants submitted

23.0% of the home improvement applications. The bank's percentage of loans to moderate-income borrowers is significantly below the 1999 aggregate's percentage of home improvement loans (25.4%) to these borrowers. In 1999, FTB had an overall market share of 4.1% of the home improvement loans. FTB's market share of home improvement loans to moderate-income borrowers was 2.3% in 1999. In 2000, the bank originated one home improvement loan (16.7%) to a moderate-income borrower. Moderate-income applicants submitted 31.0% of the home improvement loan applications.

The bank's level of home refinance lending to low-income borrowers is poor. In 1999, the bank originated 95 home improvement loans, which six (6.3%) were to low-income borrowers. Low-income families comprise 17.8% of total families. In 1999, low-income applicants submitted 9.4% of the home refinance loan applications. The bank's percentage of home refinance loans to low-income borrowers is below the 1999 aggregate's percentage of home refinance loans (9.9%) to these borrowers. In 1999, FTB had an overall market share of 2.4% of home refinance loans. Its market share of home refinance loans to low-income borrowers was 1.5% in 1999. In 2000, the bank originated 26 home refinance loans, which 7.7% were to low-income borrowers. In comparison, low-income applicants submitted 9.0% of the home refinance applications.

The bank's level of home refinance lending to moderate-income borrowers is adequate. In 1999, the bank originated 18 home refinance loans (18.9%) to moderate-income borrowers. Moderate-income families comprise 20.0% of total families. The bank's percentage of loans to moderate-income borrowers is slightly below the 1999 aggregate's percentage of home refinance loans (21.7%) to these borrowers. In 1999, FTB had an overall market share of 2.4% of the home refinance loans. Its market share of home refinance loans to moderate-income borrowers was 2.1% in 1999. In 2000, the bank originated nine home refinance loans (34.9%) to moderate-income borrowers. Moderate-income applicants submitted 33.0% of the home refinance applications.

The following table compares the bank's performance at the previous evaluation to the current evaluation. As indicated in the table, the bank's performance has improved in the origination of home purchase and home refinance loans for low-and moderate-income borrowers. The bank's performance in the origination of home improvement loans improved for low-income borrowers but basically remained the same for moderate-income borrowers.

Income Level of Borrower	Previous Evaluation Dated March 8, 1999		Current Evaluation Dated March 5, 2001	
	1997	1998	1999	2000
	% of Loans	% of Loans	% of Loans	% of Loans
Home Purchase				
Low-Income	3.3	2.9	10.9	5.4
Moderate-Income	10.8	14.0	10.0	16.8
Home Improvement				
Low-Income	0.0	16.7	14.3	33.3
Moderate-Income	11.1	27.8	14.3	16.7
Home Refinance				
Low-Income	4.2	2.1	6.3	7.7
Moderate-Income	5.6	13.8	18.9	34.6

The bank's level of consumer lending to low-income borrowers is poor. FTB originated 9.4% of consumer loans to low-income borrowers as 19.5% of low-income households comprise the assessment area. In 2000, the bank originated 7.7% of its consumer loans to low-income borrowers.

The bank's level of consumer lending to moderate-income borrowers is good. FTB originated 20.4% of consumer loans moderate-income borrowers as 18.6% of moderate-income households comprise the assessment area. In 2000, the bank originated 17.7% of its consumer loans to moderate-income borrowers.

Within the Naples assessment area, the bank makes limited use of innovative and flexible lending criteria and programs to originate loans to low- and moderate-income individuals or areas and small businesses. The bank offers the Good Neighbor Program for mortgage loans. Some of the features of this program are 100 percent financing, no private mortgage insurance, and low interest rates. In both assessment areas, the bank has originated \$1.7 million in loans under this program.

Community Development Lending

FTB makes an adequate level of community development loans in the Naples assessment area. During the review period, the bank originated three community development loans totaling \$2.4 million. A description of these loans is provided in the following table.

COMMUNITY DEVELOPMENT LENDING FOR NAPLES ASSESSMENT AREA		
BORROWER	AMOUNT	PURPOSE
Habitat for Humanity of Collier County	\$50,000	The loan was granted to this nonprofit organization to purchase land to construct affordable housing for low- and moderate-income families.
Wild Pines of Naples Phase II	\$730,000	The loan was to help fund the initial construction of this 101 unit multi-family housing complex for low-income people. In addition, Fifth Third Bank also purchased the LIHTC for this project.
North American Canoe Tours	\$1,660,000	The loan was for the purpose of construction and expansion of a business in Everglade City, which is considered a state enterprise zone.

INVESTMENT TEST

Based upon the availability of qualified investments and competition in the market, FTB's level of investments is excellent. FTB purchased a LIHTC project for \$1.6 million, which \$755,000 was funded in 2000. This project was the construction of a 101-unit apartment complex for low-income persons or families. According to community contacts and government officials, there have been no issuance of municipal or revenue bonds in the Naples assessment area that meet the definition of community development under CRA. FTB underwrote the only LIHTC project in the Naples assessment area in 1999 or 2000. In addition, there are no small business investment companies or small business development companies in Collier County. Bank management had considered an equity investment in a community development corporation outside its assessment area; however, management of the community development corporation could not provide a guarantee that it would include projects in the Naples assessment area.

The bank's purchase of the LIHTC project was very responsive to community development needs. One of the primary needs of the assessment area was affordable single- or multi-family housing. This project will be providing 101 rental units to low-income families. While LIHTC projects are not necessarily innovative, these projects are complex because of the number of people or entities involved. The bank's qualified investments are not routinely provided by private investors.

SERVICE TEST

Retail Services

The bank's retail delivery systems are reasonably accessible to its assessment area, including low- and moderate-income census tracts. According to Table 15 in Appendix C, the bank has no branches in low- and moderate-income geographies. However, branches in middle- and upper-income census tracts are within a reasonable distance (less than four miles) of low- and moderate-income census tracts. Most of the bank's low- and moderate-income tracts are near downtown Naples and within two miles of the main office.

Since the previous examination, the bank has opened two branches in the Naples assessment area. Both branches were opened in middle-income tracts. No branches have been closed since the previous examination. Availability of banking services and hours of operations do not vary in a manner that inconveniences portions of the assessment area. The level of branch services and hours offered by FTB is basically the same throughout the assessment area.

Community Development Services

The bank provides a good level of community development services. Bank personnel have used their financial and managerial expertise in various community development services to benefit the assessment area. The purpose of most community development services was to promote decent and affordable housing for low- and moderate-income families and small business economic development.

- Fifth Third Bank's credit officer sits on the committee that administers the **Microloan Program in Collier County** and was involved in establishing the underwriting policy.
- **Consumer Credit Counseling Service of Central Florida, Inc.** - A FTB manager provides financial consultation as well as holds the position of president of the organization. The Carillon Banking Center also provided the use of their conference room for the financial consultants until the new facility was available.
- **United Way of Collier/Lee County** is a nonprofit organization that is governed by volunteers who represent various constituencies of the local community and who conduct community fund raising campaigns and distribute these funds to agencies, organizations, and programs that serve

people in the local community. Several bank employees are and have been officers and committee members of the United Way of Collier County.

- **Project Help** is a nonprofit organization located in Collier County and designed to assist low- and moderate-income women in crisis. A bank officer provides financial expertise.
- **Boys and Girls Club** has a mission to help boys and girls of all backgrounds (with an emphasis on low- and moderate-income children and youths-at-risk) build confidence, develop character and acquire the needed skills to grow into productive, civic-minded, responsible adults. A FTB bank officer in Collier County served on the capital campaign committee for a new facility for low- to moderate-income residents of Collier County.
- **Small Business Development Center** is sponsored by the Small Business Administration and provides consulting and technical support to small businesses. A bank officer of Fifth Third Bank of Florida serves on the Board and loan committee.
- **Collier County Banking Partnership** is a consortium of local banks whose purpose is to identify and address the financial needs of low- and moderate-income areas and persons, and small businesses. Through this organization, the Collier County Microloan Enterprise Corporation was formed to address the need for small dollar loans for small businesses. A banking officer from Fifth Third Bank of Florida serves on the Board of this organization.
- Branch employees provide checkbook registers for training sessions in banking and balancing a checkbook and purchasing items in the school store for teachers of the **Everglades City Schools** in Collier County.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN FORT MYERS MSA, FLORIDA

This assessment area consists of most of Lee County, Florida, which is part of the Fort Myers-Cape Coral MSA. Within the assessment area, there is one low-income census tract, eight moderate-income census tracts, 55 middle-income census tracts, and 10 upper-income census tracts.

INSTITUTION'S OPERATIONS

FTB operates four banking offices in this assessment area, which represents 40% of the bank's total banking offices. 45% of the bank's lending and 48% of the bank's deposits are in this assessment area.

PERFORMANCE CONTEXT

Known as a tourist center, Lee County is located in Southwest Florida, where it is bordered by Charlotte Harbor and the Gulf of Mexico on the west and by the counties of Charlotte, Hendry, and Collier counties on the north, east and south, respectively. The county has 237 square miles of inland water and 172 square miles of coastal/territorial water. Incorporated areas in Lee County include Cape Coral, Fort Myers, Bonita Springs, Sanibel, and Fort Myers Beach. Cape Coral is the city with the greatest population. Other unincorporated communities include North Fort Myers, Lehigh Acres, San Carlos Park, and South Fort Myers.

The chart on the following page provides some demographic information according to the 1990 Census for the Fort Myers assessment area.

Demographics and Economics of the Fort Myers MSA Assessment Area	
<i>Assessment Area Population based off 1990 census</i>	285,543
<i>Population in the State of Florida</i>	12,937,926
<i>Assessment Area Population as a % of State's population</i>	2.2
<u><i>MSA Median Family Income:</i></u>	
<i>1990 Median Family Income for Assessment Area</i>	\$32,310
<i>1990 Median Family Income for State of Florida</i>	\$32,212
<u><i>Percentage of Families by Income Level of Families:</i></u>	
<i>Low-Income</i>	15.9
<i>Moderate-Income</i>	19.5
<i>Middle-Income</i>	24.9
<i>Upper-Income</i>	39.7
<i>Poverty Level</i>	6.2
<u><i>Number of Total Housing Units:</i></u>	
<i>1-4 Family Residential</i>	101387
<i>Multi-Family</i>	38,271
<i>Mobile Home or Trailer</i>	19,487
<i>Other</i>	1,651
<i>Owner-Occupied Housing Units</i>	83,365
<i>Rental Housing Units</i>	35,839
<i>Vacant Housing Units</i>	41,097
<u><i>Percentage of Total Housing Units:</i></u>	
<i>1-4 Family Residential</i>	63.3
<i>Multi-Family</i>	23.9
<i>Mobile Home or Trailer</i>	12.2
<i>Other</i>	1.0
<i>Owner-Occupied Housing Units</i>	52.0
<i>Rental Housing Units</i>	22.4
<i>Vacant Housing Units</i>	25.6
<u><i>Median Housing Characteristics:</i></u>	
<i>Median Age in Years</i>	12
<i>Median Home Value</i>	\$95,125
<i>Median Gross Rent</i>	\$516

Demographic and Income Characteristics

At the time of the 1990 Census, the population of the Fort Myers assessment area was 285,543 persons. This figure represented 2.2% of the population for the state of Florida. The 1990 median family income for the Fort Myers/Cape Coral MSA, which encompasses the assessment area, is basically the same as the median family income for the state of Florida. The HUD adjusted median family incomes for the MSA were \$45,700 and \$47,900, respectively, for 1999 and 2000. Based on the 1990 census, of the 76 tracts in the assessment area, 1.3% are low-income and 10.5% are

moderate-income.

There are 119,154 households and 84,484 families within the assessment area. Of the 84,484 families, 15.9% are low-income families and 19.5% are moderate-income families, with 6.2% (5,215) of the total families having incomes below the poverty level.

Housing Characteristics

As of 1990, there were 160,301 housing units, which 63.2% were one-to-four family units, 23.9% were five or more family units, 12.2% were mobile homes, and 1.0% were other units, including boarded-up units.

Of the housing units in the assessment area, 52.0% were owner-occupied and 22.4% were rental units. Also, 25.6% of the housing units were vacant. Most of the vacant units, which include units for sale, were in middle- and upper-income census tracts. Less than nine percent of the housing units are in low- and moderate-income census tracts.

The median age of the housing stock was 12 years, compared to the median age of 15 years for the housing stock for the state of Florida. The median age of housing in low- and moderate-income census tracts was 19 and 20 years, respectively. The median value of owner-occupied housing in the assessment area was \$95,125, as compared to \$39,100 in low-income census tracts and \$70,977 in moderate-income census tracts. According to the National Association of Realtors, the median selling prices of homes in Lee County, Florida, were \$94,400 and \$101,800, respectively, in 1999 and 2000.

Labor, Employment and Economic Characteristics

The economy of Ft. Myers, Florida has remained stable for the past two years. The unemployment rates for 1999 and 2000 are 2.8% and 2.7%, respectively. These levels of unemployment compare favorably to the unemployment rates for the state of Florida, which were 3.9% for 1999 and 3.6% for 2000.

According to Dunn and Bradstreet, there were 15,424 businesses in the bank's assessment area. Of the businesses, 97% were non-farm businesses. 87.0% of the businesses had gross annual revenues of \$1 million or less and are considered small businesses. 78.6% of the businesses had revenues of \$500,000 or less. 62.8% of the businesses employed less than five persons.

The following table depicts the level of employment in Lee County, Florida by industries. This information was taken from Dunn and Bradstreet as of July 1, 2000.

Industry	Percent of Total Employment
Services	38.4
Retail Trade	21.7
Construction	11.9
Agriculture, Forestry, and Fishing	2.9
Finance, Insurance, and Real Estate	10.9
Wholesale Trade	5.3
Manufacturing	4.4
Transportation and Communication	3.7
Other	10.8

Competition

As of June 30, 2000, 28 financial institutions with 156 banking offices were operating in Lee County. Total deposits in the assessment area equaled \$5.7 billion. Asset size of these entities range from approximately \$20 million to over \$300 billion. FTB ranked tenth in deposit market share (2.0%). The

top three banks had deposit market shares of 29.4%, 16.9%, and 11.3%. FTB operates four offices in the assessment area, which represents 2.5% of the total banking offices in the assessment area. Offices operated by an individual entity range from 1 to 35 offices. Product competition among the financial institutions is very strong. Many banks offer flexible and innovative mortgage and small business loan products with extended terms, no private mortgage insurance, no closing costs, etc. While FTB does not offer as many innovative and flexible lending programs as the larger banks, FTB does offer a 30-year fixed rate mortgage loan with no PMI (a designated product for low- and moderate-income borrowers) through its affiliate mortgage company. FTB also offers Small Business Administration (SBA) guaranteed loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FORT MYERS MSA

LENDING TEST

The bank's performance under the lending test is adequate.

Lending Activity

Considering the bank's market share of deposits, product offerings, and branch networking system as a percent of total branches in the assessment area, lending levels reflect adequate responsiveness to assessment area credit needs. FTB maintains a 2.0% deposit market share in the Fort Myers assessment area. Of the 182 small business loans made by the institution in 1999, 65 loans (36%), totaling \$6.9 million, were originated in the Fort Myers assessment area. According to the 1999 CRA aggregate disclosure statement for the Naples MSA, FTB ranked eighteenth among 101 lenders in the origination of small business loans. Of total small business loans originated in the Fort Myers assessment area, FTB had a market share of 1.1%. Of the 213 small business loans made by FTB in 2000, 116 (54%) were originations in the Fort Myers assessment area. Overall, the bank originated 181 small business loans in the Fort Myers assessment area compared to 49 small business loans in 1997 and 1998 at the previous evaluation dated March 8, 1999. The increase in small business lending is attributed to the bank opening more branches in the Fort Myers assessment area.

Of the 513 HMDA loans originated by FTB in 1999, 154 loans (32%) totaling \$18.6 million were originated in the Fort Myers assessment area. Of the 154 HMDA loans, 92 (60%) were home purchase loans, 47 (31%) were home refinance loans, and 15 (9%) were home improvement loans. The majority of the HMDA loans were for home purchases, which was an identified credit need.

Of the 561 HMDA loans originated by FTB in 2000, 306 loans (55%) totaling \$35.7 million were originated in the Fort Myers assessment area. Of the 306 loans, 284 (93%) were home purchase loans, 9 (3%) were home improvement loans and 13 (4%) were home refinance loans. Overall, for 1999 and 2000, the bank originated 460 HMDA related loans in the Fort Myers assessment area compared to 165 HMDA related loans in 1997 and 1998 at the previous examination. The significant increase in HMDA lending is due to the bank opening three branch offices in the Fort Myers market. While the bank experienced a significant increase in HMDA lending at this examination, HMDA lending to low- and moderate-income borrowers improved slightly.

Geographic Distribution

For this analysis, the geographic distribution of small business and HMDA lending was compared with the demographic information available. Performance context issues were also considered, as well as the performance of other banks and FTB's performance at the previous evaluation. FTB's performance in extending loans in all geographies, including low- and moderate-income census tracts, is adequate.

FTB did not originate any small business loans in low-income census tracts in 1999 and 2000 in the Fort Myers assessment area. These tracts contain 1.1% of the small businesses in the assessment area. Aggregate lending data indicates that the market did not perform well, originating only 0.2% of

its small business loans in these tracts. The bank's origination of small business loans in moderate-income tracts is excellent. The bank originated 13.9% of its small business loans in these tracts in 1999 and moderate-income tracts contain 8.4% of the small businesses in the assessment area. 1999 aggregate small business lending data shows that the market originated 6.5% of its small business loans in moderate-income census tracts. In 2000, the bank originated 17.2% of its small business loans in moderate-income census tracts.

The table on the following page displays the geographic distribution of the bank's small business loans in low- and moderate-income geographies at the previous evaluation (years 1997 and 1998) and the current evaluation (years 1999 and 2000). As indicated in the following table, the bank's performance did not change in low-income census tracts, but significant improvement was noted in moderate-income census tracts.

Income Level of Census Tract	Previous Evaluation Dated March 8, 1999		Current Evaluation Dated March 5, 2001	
	1997	1998	1999	2000
	% of Loans	% of Loans	% of Loans	% of Loans
Low-Income	0.0	0.0	0.0	0.0
Moderate-Income	0.0	5.9	13.9	17.2

FTB did not originate any home purchase loans in or receive any home purchase applications from low-income census tracts in 1999 and 2000. Low-income census tracts contain 1.2% of the owner-occupied units in the assessment area. 1999 aggregate lending data indicates that the market made few home purchase loans, originating only 0.2% of its home purchase loans in low-income census tracts. According to community contacts, the lack of lending in these tracts is attributed to the lack of owner-occupied units for sale and the lack of construction of single family dwellings in these tracts.

Home purchase lending in moderate-income census tracts is marginally adequate. FTB originated 1.1% of its home purchase loans in moderate-income tracts in 1999. Moderate-income census tracts contain 5.7% of the owner-occupied units in the assessment area. 1999 aggregate HMDA lending data indicates that the market outperformed the bank by originating 3.5% of its home purchase loans in moderate-income census tracts. The bank's market share of home purchase loans in 1999 was 0.1%, with negligible market share in low- and moderate-income census tracts. In 2000, FTB originated 4.2% of its home purchase loans (12) in moderate-income census tracts, showing significant improvement over the 1999 lending level. In 2000, the bank received 12 home purchase loan applications from moderate-income census tracts.

FTB originated no home improvement loan in low-income census tracts in 1999 and only one loan in 2000 in the Fort Myers assessment area. In 1999, the bank did not receive any home improvement loan applications from low-income census tracts. In 2000, it received only one home improvement loan application from low-income census tracts. According to 1999 aggregate HMDA lending data, the market did not perform well originating only 0.6% of its home improvement loans in low-income census tracts.

In 1999, FTB originated one home improvement loan (6.7%) in moderate-income census tracts. The bank received two home improvement loans applications from moderate-income census tracts. 1999 aggregate HMDA lending data shows that the market originated 5.5% of its home improvement loans in moderate-income census tracts, which is below the bank's performance in 1999. In 2000, FTB received two home improvement applications from moderate-income census tracts, but they did not result in loan originations.

In 1999, FTB did not receive any home refinance loan applications from low-income census tracts. Aggregate lending data shows that the market originated 0.5% of its home refinance loans in low-income census tracts. Also, in 2000, the bank did not receive any home refinance loan applications from low-income census tracts.

In 1999, FTB did not originate any home refinance loans in moderate-income census tracts. FTB received two home refinance applications from moderate-income tracts in 1999. Aggregate lending data shows that the market originated 5.5% of its home refinance loans in moderate-income census tracts. In 2000, the bank received two home refinance loan applications from moderate-income census tracts, but it did not result in loan originations.

The following table displays the bank's performance at the previous evaluation for years 1997 and 1998 as compared to the bank's current performance for 1999 and 2000. As indicated in the table, the bank's performance level in the origination of home purchase loan in moderate-income tracts, which was identified as a primary credit need, has improved. Also, improvement was noted in the bank's level of performance in home improvement lending in low-income census tracts although deterioration was noted in moderate-income tracts.

Income Level of Census Tract	Previous Evaluation Dated March 8, 1999		Current Evaluation Dated March 5, 2001	
	1997	1998	1999	2000
	% of Loans	% of Loans	% of Loans	% of Loans
Home Purchase				
Low-Income	0.0	0.0	0.0	0.0
Moderate-Income	1.8	0.0	1.1	4.2
Home Improvement				
Low-Income	0.0	0.0	0.0	11.1
Moderate-Income	0.0	14.3	6.7	0.0
Home Refinance				
Low-Income	0.0	0.0	0.0	0.0
Moderate-Income	0.0	7.5	0.0	0.0

FTB did not originate any consumer loans in low-income census tracts in 1999. The lack of lending can be attributed to high poverty levels in these tracts. In 2000, the bank originated one consumer loan (0.4%) in low-income census tracts. FTB originated 7.0% (20 loans) of its consumer loans in moderate-income census tracts, which contains 8.3% of the total households in the assessment area. In 2000, the bank originated 4.3% (12 loans) of its consumer loans in moderate-income census tracts.

Distribution By Borrower Income and Revenue Size of Business or Farm

For this analysis, the distribution of small business lending by business revenue sizes and HMDA lending by borrower income levels was compared with available demographic information. Performance context issues were also considered, as well as the performance of other banks. The distribution of loans by borrower's income and revenue sizes of businesses is adequate.

In 1999, 65 small business loans were originated in the Fort Myers assessment area, which 63.0% were extended to businesses with revenues of \$1 million or less. In comparison, 86.9% of the businesses in the assessment area have annual revenues of \$1 million or less. According to 1999 aggregate small business lending data, 59.4% of the market's small business loans were to small businesses, which is below the bank's performance level. According to a community contact, many of the small businesses do not go to banks for small business loans because the owners are independently wealthy or they know private investors who can provide the funds needed for their business. Of the 65 small business loans, 45 (69.2%) were in amounts of \$100,000 or less indicating the bank's willingness to originate small dollar business loans. According to 1999 aggregate small business lending data, 89.1% of the small business loans were in amounts of \$100,000 or less.

In 2000, 116 small business loans were originated in the Fort Myers assessment area, which 54.3% were extended to small businesses. In addition, 84 of the 116 small business loans were originated in

amounts of \$100,000 or less. According to 1999 aggregate small business lending data, 89.1% of the small business loans were in amounts of \$100,000 or less.

As indicated in the following table, the bank's percentage of loans to small businesses and the percentage of loans in amounts less than \$100,000 somewhat decreased over the two examination periods. However, the actual number of loans to small businesses and loans in amounts of \$100,000 increased over the two examination periods.

	Previous Evaluation Dated March 8, 1999		Current Evaluation Dated March 5, 2001	
	1997	1998	1999	2000
	% of Loans	% of Loans	% of Loans	% of Loans
% of Loans to Small Businesses	72.4	58.8	63.0	54.3
Small Business Loans <\$100,000	86.2	70.7	69.2	72.4

Home purchase lending to low-income borrowers was good. Low-income families represent 15.9% of families in the Fort Myers assessment area, and 6.7% of the bank's HMDA loans in 1999 were originated to low-income borrowers. A possible reason for the lending disparity between the demographics and the bank's lending level is the percentage of applications received from low-income applicants in the Naples assessment area. Low-income applicants submitted 6.8% of the home purchase loan applications in 1999. 1999 aggregate HMDA lending data indicates that the bank outperformed the market, which originated only 6.2 % of its home purchase loans to low-income borrowers. In 1999, the bank had an overall market share of .1% of the home purchase loans. Its market share of home purchase loans to low-income borrowers was .1%. In 2000, the bank originated only 1.5% of its home purchase loans to low-income borrowers. However, low-income applicants submitted only .1% of the home purchase applications.

Home purchase lending to moderate-income borrowers was poor. Moderate-income borrowers received 10.1% of the HMDA loans in 1999 and moderate-income families comprised 19.5% of total families in the Fort Myers assessment area. 1999 aggregate HMDA lending data indicates that the bank performed well below the market, which originated 18.6% of its HMDA loans to moderate-income applicants. The bank's market share of home purchase loans to moderate-income borrowers was comparable to an overall market share for home purchase loans. The lack of significant home purchase lending activity can be attributed to the lack of applications from this segment of the market. Moderate-income applicants submitted only 11.7% of the home purchase applications. Also, according to community contacts, many institutions use brokers to seek out applications from this segment of the market. FTB does not use brokers because of the fees the applicants would incur. In 2000, the bank originated 17.0% of its home purchase loans to moderate-income borrowers. Moderate-income borrowers submitted 8.5% of the home purchase applications in 2000.

The bank's level of home improvement lending to low-income borrowers is poor. In 1999, the bank originated 15 home improvement loans, which none were originated to low-income borrowers. Low-income families comprise 15.9% of the total families. In 1999, low-income applicants did not submit any home improvement applications. The bank's percentage of loans to low-income borrowers is significantly below the 1999 aggregate's percentage of home improvement loans (7.7%) to these borrowers. In 1999, FTB had an overall market share of 1.7% of home improvement loans with negligible market share to low-income borrowers. In 2000, the bank originated 9 home improvement loans, which one (11.1%) was originated to a low-income borrower. Low-income applicants submitted one home improvement application in 2000.

The bank's level of home improvement lending to moderate-income borrowers is good. In 1999, the bank originated four home improvement loans (26.7%) to moderate-income borrowers. Moderate-income families comprise 19.5% of the total families. In 1999, moderate-income applicants submitted

five applications or 19.2% of total home improvement applications. The bank's percentage of loans to moderate-income borrowers exceeds the 1999 aggregate's percentage of home improvement loans (22.4%) to these borrowers. In 1999, FTB had an overall market share of 1.7% of the home improvement loans. Its market share of home improvement loans to moderate-income borrowers was 2.0% in 1999. In 2000, the bank originated nine home improvement loans, which 2 (22.2%) were to moderate-income borrowers. Moderate-income applicants submitted two application, or 15.4% of total home improvement loan applications.

The bank's level of home refinance lending to low-income borrowers is poor. FTB did not originate any home refinance loans to low-income borrowers in 1999 because there were no applications for home refinance loans from low-income families. The bank's percentage of home refinance loans to low-income borrowers is significantly below the 1999 aggregate's percentage of home refinance loans (7.8%) to these borrowers. In 2000, the bank originated 13 home refinance loans, which three (23.1%) were to low-income borrowers. In comparison, low-income applicants submitted four applications, which accounted for 18.2% of the home refinance applications.

The bank's level of home refinance lending to moderate-income borrowers is poor. In 1999, the bank originated five home refinance loans (10.6%) to moderate-income borrowers. Moderate-income applicants submitted six (11.3%) of the 53 home refinance applications in 1999. Moderate-income families comprise 19.5% of total families in the assessment area. The bank's percentage of loans to moderate-income borrowers is significantly below the 1999 aggregate's percentage of home refinance loans (18.9%) to these borrowers. In 1999, FTB had an overall market share of 0.1% of the home refinance loans with negligible market share to moderate-income borrowers. In 2000, the bank originated two home refinance loans (15.4%) to moderate-income borrowers. Moderate-income applicants submitted two (9.0%) of the 22 of the home refinance applications.

The following table compares the bank's performance at the previous evaluation to the current evaluation. As indicated in the table, the bank's performance has improved in the origination of home purchase and home refinance loans for low-and moderate-income borrowers. The bank's performance in the origination of home improvement loans to moderate-income borrowers improved. However, the bank's performance level in the origination of home improvement loans to low-income borrowers decreased.

Income Level of Borrower	Previous Evaluation Dated March 8, 1999		Current Evaluation Dated March 5, 2001	
	1997	1998	1999	2000
	% of Loans	% of Loans	% of Loans	% of Loans
Home Purchase				
Low-Income	2.5	3.7	6.7	1.5
Moderate-Income	12.1	14.7	10.1	17.0
Home Improvement				
Low-Income	0.0	18.2	0.0	11.1
Moderate-Income	16.7	27.3	26.7	22.2
Home Refinance				
Low-Income	4.9	2.7	0.0	23.1
Moderate-Income	6.6	15.0	10.6	15.4

The bank's level of consumer lending to low-income borrowers is poor. In 1999, 6.3% of the consumer loans were originated to low-income borrowers, and low-income households comprise 19.3% of total households. In 2000, the bank originated 5.0% of its consumer loans to low-income borrowers.

The bank's level of consumer lending to moderate-income borrowers is adequate. 2.6% of the consumer loans in 1999 were originated to moderate-income borrowers, and moderate-income households comprise 18.2% of total households. In 2000, the bank originated 13.9% of its consumer loans to moderate-income borrowers.

Community Development Lending

FTB makes a good level of community development loans in the Fort Myers assessment area. During the review period, the bank originated five community development loans totaling \$4.1 million. A description of these loans is provided in the following table.

COMMUNITY DEVELOPMENT LENDING FOR FORT MYERS ASSESSMENT AREA		
BORROWER	AMOUNT	PURPOSE
Boys and Girls Clubs of Lee County, Inc.	\$35,515	Provided long term working capital loans. This organization provides community development services to children of low- and moderate-income families.
Quality Life Center of Southwest Florida, Inc.	\$15,000	Financed purchase of accounting software. This organization provides community development services to low- and moderate-income families.
Southwest Florida Workforce Development Board	\$150,000	Funded up front fees for the construction of a One-Stop Career Center. This organization provides job training and counseling for former welfare recipients.
Heritage Square Land Trust	\$1,600,000	Loan is in a county designated redevelopment zone.
First Christian Church	\$2,300,000	Loan is in a county designated redevelopment zone.

INVESTMENT TEST

Based upon the availability of qualified investments and competition in the market, FTB's level of investments is adequate. FTB's investments were limited to grants and donations totaling \$39,900 to various community development group and agencies. According to community contacts and government officials, there have been no issuance of municipal or revenue bonds in the Fort Myers assessment area that meet the definition of community development under CRA. Also, there have been no LIHTC projects funded by the state of Florida in Lee County. In addition, there are no small business investment companies or small business development companies in Lee County. Bank management had considered an equity investment in a community development corporation outside its assessment area; however, management of the community development corporation could not provide a guarantee that it would include projects in the Fort Myers assessment area.

SERVICE TEST

Retail Services

The bank's retail delivery systems are reasonably accessible to its assessment area including low- and moderate-income census tracts. According to Table 15 in Appendix C, the bank has no branches in low- and moderate-income geographies. However, branches in middle- and upper-income census tracts are within a reasonable distance (less than four miles) of low- and moderate-income census tracts. Most of the bank's low- and moderate-income tracts are near downtown Naples and within two miles of the main office.

Since the previous examination, the bank has opened three branches in the Fort Myers assessment area. Also, the bank consolidated two banking offices. The consolidation of offices did not adversely affect the availability of banking services to low- and moderate-income areas or persons. Availability of banking services and hours of operations do not vary in a manner that inconveniences portions of the assessment area. The level of branch services and hours offered by FTB is basically the same throughout the assessment area.

Community Development Services

The bank provides an adequate level of community development services. Bank personnel have used their financial and managerial expertise in various community development services to benefit the assessment area. The purpose of most community development services was to promote decent and affordable housing for low- and moderate-income families and small business economic development. FTB has been working with the Lee County Housing Authority to structure a home ownership program for farm workers in the county. This program will consist of providing mortgage loans, as well as providing educational seminars regarding banking and budgeting. Please refer to the overall institution write-up regarding additional community development services provided in the Fort Myers assessment area.

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED	1/1/1999 TO 12/31/2000		
FINANCIAL INSTITUTION Fifth Third Bank, Naples, Florida			PRODUCTS REVIEWED HMDA Small Business Small Business Secured By RRE Consumer Unsecured
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
Fifth Third Mortgage Company	Bank subsidiary		Mortgage loans
Fifth Third Community Development Corporation	Holding company subsidiary		Investments
Fifth Third Bank, Ohio	Holding company subsidiary		Investments

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED¹	OTHER INFORMATION
Florida MSA 2700 - Fort Myers/Cape Coral MSA 5345 - Naples	 Full procedures Full Procedures	 McGregor Branch Fifth Third Center	

¹There is a statutory requirement that the written evaluation of a multi-state institution's performance must list the individual branches examined in each state.

APPENDIX C

CRA GLOSSARY

Aggregate lending: The number of loans originated and purchased by all lenders, subject to reporting requirements, as a percentage of the aggregate number of loans originated and purchased by all lenders in the MSA/assessment area.

Block numbering area (“BNA”): Statistical subdivisions of a county for grouping and numbering blocks in nonmetropolitan counties where local census statistical area committees have not established census tracts. BNAs do not cross county lines.

Census tract: Small subdivisions of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. They 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 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,

Consumer loan: A loan 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 of loans: motor vehicle, credit card, home equity, other secured loan, and other unsecured loan.

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, 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 U.S. Bureau of the Census in the most recent decennial census.

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

Home mortgage loans: Include home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings 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.

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.

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, branch distribution).

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 lenders in the MSA/assessment area.

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

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.

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.

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

Optional loans: Includes any unreported category of loans for which the institution collects and maintains data for consideration during a CRA examination. Also includes 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.

Small loans to business: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small loans to farms: 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 thousand or less and are either secured by farmland, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

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.

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.

Table 1. Lending Volume

LENDING VOLUME December 31, 1999		State: Florida						Evaluation Period: January 1, 1999, TO				
MA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Reported Loans		% of Rated Area Deposits in MSA/AA
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:												
Fort Myers/Cape Coral	32	154	18,601	65	6,975	0	0	2	51	221	25,627	41
Naples	68	349	59,537	117	19,799	0	0	0	0	466	79,802	59

Table 1a. Lending Volume

LENDING VOLUME December 31, 2000		State: Florida						Evaluation Period: January 1, 2000, TO				
MA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Reported Loans		% of Rated Area Deposits in MSA/AA
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:												
Fort Myers/Cape Coral	55	306	35,713	116	12,946	1	200	3	4,050	426	52,909	41
Naples	45	255	49,033	95	15,335	0	0	3	2,440	353	66,808	59

Table 1b. Lending Volume

LENDING VOLUME		State: Florida						Evaluation Period: January 1, 1999 TO December 31, 1999						
MA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA	Home Equity		Motor Vehicle		Secured		Unsecured		Other Consumer		Total Optional Loans		% of Rated Area Deposits in MSA/AA
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:														
Fort Myers/Cape Coral	48	106	860	128	2,118	2	106	5	150	45	1,059	286	4,293	41
Naples	52	146	0	100	1,992	11	273	1	25	51	1,162	309	3,452	59

Table 1c. Lending Volume

LENDING VOLUME		State: Florida						Evaluation Period: January 1, 2000 TO December 31, 2000						
MA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA	Home Equity		Motor Vehicle		Secured		Unsecured		Other Consumer		Total Optional Loans		% of Rated Area Deposits in MSA/AA
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:														
Fort Myers/Cape Coral	46	168	6	85	1,326	2	44	2	32	24	601	281	2,009	41
Naples	54	219	28	82	1,432	5	120	2	67	19	451	327	2,098	59

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		State: Florida		Evaluation Period: January 1, 1999 to December 31, 1999										
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
Fort Myers/Cape Coral	92	28	0.6	0.0	5.7	1.1	81.5	87.0	12.1	11.9	0.2	5.0	81.6	13.2
Naples	232	72	1.2	0.0	7.7	1.3	57.9	52.2	33.2	46.5	0.1	3.5	58.3	38.1

Table 2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		State: Florida		Evaluation Period: January 1, 1999 TO December 31, 1999											
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	Overa ll	Lo w	Mo d	Mid	Up p
Full-Review:															
Fort Myers/Cape Coral	92	28	0.6	0.0	5.7	1.1	81.5	87.0	12.1	11.9	.06	0.0	.01	.06	.05
Naples	232	72	1.2	0.0	7.7	1.3	57.9	52.2	33.2	46.5	2.0	0.0	.07	1.8	2.5

Table 2b. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		State: Florida		Evaluation Period: January 1, 2000 TO December 31 2000							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		
	#	% of Total	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	
Full-Review:											

Fort Myers/Cape Coral	284	56	0.6	0.0	5.7	4.2	81.5	71.5	12.1	24.3
Naples	222	44	1.2	0.0	7.7	1.8	57.9	59.0	33.2	39.2

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			State: Florida				Evaluation Period: January 1, 1999 to December 31, 1999							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
Fort Myers/Cape Coral	15	42	0.6	0.0	5.7	6.7	81.5	86.6	12.1	6.7	0.6	5.5	86.4	7.5
Naples	21	58	1.2	0.0	7.7	0.0	57.9	76.2	33.2	23.8	2.1	8.1	68.8	21.0

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999								
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	Overa ll	Lo w	Mo d	Mid	Up p
Full-Review:															
Fort Myers/Cape Coral	15	42	0.6	0.0	5.7	6.7	81.5	86.6	12.1	6.7	1.6	0.0	2.0	1.6	1.4
Naples	21	58	1.2	0.0	7.7	0.0	57.9	76.2	33.2	23.8	3.9	0.0	0.0	4.4	4.5

Table 3b. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT TO December 31, 2000			State: Florida				Evaluation Period: January 1, 2000			
MA/Assessment Area:	Total Home Improvement Loans	Low-Income Geographies	Moderate-Income Geographies	Middle-Income Geographies	Upper-Income Geographies					

	#	% of Total	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans
Full-Review:										
Fort Myers/Cape Coral	9	60	0.6	11.1	5.7	0.0	81.5	77.8	12.1	11.1
Naples	6	40	1.2	0.0	7.7	0.0	57.9	100.0	33.2	0.0

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999				Aggregate HMDA Lending (%) by Tract Income			
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low	Mod	Mid	Upp
	#	% of Total	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans				
Full-Review:														
Fort Myers/Cape Coral	47	33	0.6	0.0	5.7	0.0	81.5	85.1	12.1	14.9	0.5	5.5	79.8	14.2
Naples	96	67	1.2	0.0	7.7	1.0	57.9	55.2	33.2	43.8	0.6	3.2	61.4	34.8

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999				Market Share (%) by Geography				
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Lo w	Mo d	Mid	Up p
	#	% of Total	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans					
Full-Review:															
Fort Myers/Cape Coral	47	33	0.6	0.0	5.7	0.0	81.5	85.1	12.1	14.9	.06	0.0	0.0	.07	.07
Naples	96	67	1.2	0.0	7.7	1.0	57.9	55.2	33.2	43.8	1.9	0.0	.06	1.7	2.4

Table 4b. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			State: Florida				Evaluation Period: January 1, 2000 TO December 31, 2000			
MA/Assessment Area:	Total Home Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans
Full-Review:										

Fort Myers/Cape Coral	13	33	0.6	0.0	5.7	0.0	81.5	61.5	12.1	38.5
Naples	26	67	1.2	0.0	7.7	0.0	57.9	69.2	33.2	30.8

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIIFAMILY		State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income			
	#	% of Total	% MF Units	% BANK Loans	% MF Units	% BANK Loans	% MF Units	% BANK Loans	% MF Units	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
Fort Myers/Cape Coral	0	0	1.0	0	5.5	0	68.0	0	25.5	0	0.0	17.7	70.6	11.7
Naples	0	0	1.8	0	2.1	0	41.1	0	55.0	0	0.0	0.0	100.0	0.0

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIIFAMILY		State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total	% MF Units	% BANK Loans	% MF Units	% BANK Loans	% MF Units	% BANK Loans	% MF Units	% BANK Loans	Overa ll	Lo w	Mo d	Mid	Up p
Full-Review:															
Fort Myers/Cape Coral	0	0	1.0	0	5.5	0	68.0	0	25.5	0	0.0	0.0	0.0	0.0	0.0
Naples	0	0	1.8	0	2.1	0	41.1	0	55.0	0	0.0	0.0	0.0	0.0	0.0

Table 5b. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIIFAMILY		State: Florida				Evaluation Period: January 1, 2000 TO December 31, 2000				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% MF Units	% BANK Loans	% MF Units	% BANK Loans	% MF Units	% BANK Loans	% MF Units	% BANK Loans
Full-Review:										
Fort Myers	0	0	1.0	0	5.5	0	68.0	0	25.5	0

Naples	1	100.0	1.8	0	2.1	0	41.1	100.0	55.0	0
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Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
Fort Myers/Cape Coral	65	36	1.1	0.0	8.4	13.9	76.3	76.9	14.2	9.2	0.2	6.5	77.1	16.2
Naples	117	64	1.5	0.0	4.4	1.7	60.1	62.4	34.0	35.9	0.7	2.9	62.1	34.3

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999								
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	Overal	Low	Mod	Mid	Upp
Full-Review:															
Fort Myers/Cape Coral	65	36	1.1	0.0	8.4	13.9	76.3	76.9	14.2	9.2	1.1	0.0	2.4	1.1	.64
Naples	117	64	1.5	0.0	4.4	1.7	60.1	62.4	34.0	35.9	2.6	0.0	1.5	2.6	2.7

Table 6b. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			State: Florida		Evaluation Period:	
January 1, 2000 TO December 31, 2000						
MA/Assessment Area:	Total Small Business Loans	Low-Income Geographies	Moderate-Income Geographies	Middle-Income Geographies	Upper-Income Geographies	

	#	% of Total	% of Business es	% BAN K Loa ns	% of Business es	% BANK Loans	% of Business es	% BANK Loans	% of Business es	% BANK Loans
Full-Review:										
Fort Myers/Cape Coral	116	55	1.1	0.0	8.4	17.2	76.3	68.1	14.2	14.7
Naples	95	45	1.5	0.0	4.4	3.2	60.1	58.9	34.0	37.9

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999							
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income			
	#	% of Total	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
Fort Myers/Cape Coral	0	0.0	0.04	0.0	5.6	0.0	80.4	0.0	14.0	0.0	0.0	5.9	76.5	17.6
Naples	0	0.0	1.5	0.0	16.0	0.0	60.8	0.0	21.7	0.0	0.0	12.0	72.0	16.0

Table 7a. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999								
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	Overa ll	Lo w	Mo d	Mid	Up p
Full-Review:															
Fort Myers/Cape Coral	0	0.0	0.04	0.0	5.6	0.0	80.4	0.0	14.0	0.0	0.0	0.0	0.0	0.0	0.0
Naples	0	0.0	1.5	0.0	16.0	0.0	60.8	0.0	21.7	0.0	0.0	0.0	0.0	0.0	0.0

Table 7b. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			State: Florida				Evaluation Period: January 1, 2000 TO December 31, 2000			
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies	
	#	% of Total	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans
Full-Review:										

Fort Myers/Cape Coral	1	100.0	0.04	0.0	5.6	0.0	80.4	100.0	14.0	0.0
Naples	0	0.0	1.5	0.0	16.0	0.0	60.8	0.0	21.7	0.0

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		State: Florida					Evaluation Period: January 1, 1999 TO December 31, 1999							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data (%)			
	#	% of Total	% Families	% BANK Loans	% Families	% BANK Loans	% Families	% BANK Loans	% Families	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
Fort Myers/Cape Coral	89	28	15.9	6.7	19.5	10.1	24.9	15.7	30.7	62.9	6.2	18.6	21.5	49.2
Naples	230	72	17.8	10.9	20.0	10.0	22.9	16.1	39.3	60.9	7.7	19.1	19.2	49.0

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		State: Florida					Evaluation Period: January 1, 1999 TO December 31, 1999								
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	Lo w	Mo d	Mid	Up p
Full-Review:															
Fort Myers/Cape Coral	89	28	15.9	6.7	19.5	10.1	24.9	15.7	30.7	62.9	.07	.07	.04	.05	.09
Naples	230	72	17.8	10.9	20.0	10.0	22.9	16.1	39.3	60.9	2.4	3.3	1.2	2.0	2.9

Table 8b. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		State: Florida					Evaluation Period: January 1, 2000 TO December 31, 2000			
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% Families	% BANK Loans	% Families	% BANK Loans	% Families	% BANK Loans	% Families	% BANK Loans
Full-Review:										
Fort Myers	135	40	15.9	1.5	19.5	17.0	24.9	10.4	30.7	71.1

Naples	203	60	17.8	5.4	20.0	16.8	22.9	12.8	39.3	64.5
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Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data (%)			
	#	% of Total	% Families	% BANK Loans	% Families	% BANK Loans	% Families	% BANK Loans	% Families	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
Fort Myers/Cape Coral	15	42	15.9	0.0	19.5	26.7	24.9	26.7	30.7	46.6	7.7	22.4	28.1	38.4
Naples	21	58	17.8	14.3	20.0	14.3	22.9	47.6	39.3	23.8	14.9	25.4	25.0	31.1

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999								
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	Overa ll	Lo w	Mo d	Mid	Upp
Full-Review:															
Fort Myers/Cape Coral	15	42	15.9	0.0	19.5	26.7	24.9	26.7	30.7	46.6	1.7	0.0	2.0	1.6	2.1
Naples	21	58	17.8	14.3	20.0	14.3	22.9	47.6	39.3	23.8	4.1	3.9	2.3	7.8	3.2

Table 9b. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			State: Florida				Evaluation Period: January 1, 2000 TO December 31, 2000			
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% Families	% BANK Loans	% Families	% BANK Loans	% Families	% BANK Loans	% Families	% BANK Loans

Full-Review:										
Fort Myers/Cape Coral	9	60	15.9	11.1	19.5	22.2	24.9	22.2	30.7	44.5
Naples	6	40	17.8	33.3	20.0	16.7	22.9	16.7	39.3	33.3

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINACE			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data (%)			
	#	% of Total	% Families	% BANK Loans	% Families	% BANK Loans	% Families	% BANK Loans	% Families	% BANK Loans	Low	Mod	Mid	Upp
Full-Review:														
Fort Myers/Cape Coral	47	33	15.9	0.0	19.5	10.6	24.9	25.5	30.7	59.6	7.8	18.9	23.5	39.8
Naples	95	67	17.8	6.3	20.0	18.9	22.9	25.3	39.3	49.5	9.9	21.7	21.6	38.8

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINACE			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999								
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	Overa ll	Lo w	Mo d	Mid	Up p
Full-Review:															
Fort Myers/Cape Coral	47	33	15.9	0.0	19.5	10.6	24.9	25.5	30.7	59.6	.08	0.0	.04	.08	1.1
Naples	95	67	17.8	6.3	20.0	18.9	22.9	25.3	39.3	49.5	2.4	1.5	2.1	2.8	3.1

Table 10b. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINACE			State: Florida				Evaluation Period: January 1,			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% Families	% BANK Loans	% Families	% BANK Loans	% Families	% BANK Loans	% Families	% BANK Loans
Full-Review:										

Fort Myers/Cape Coral	13	33	15.9	23.1	19.5	15.4	24.9	15.4	30.7	46.1
Naples	26	67	17.8	7.7	20.0	34.6	22.9	15.4	39.3	38.5

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		State: Florida		Evaluation Period: January 1, 1999 TO December 31, 1999					
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:									
Fort Myers/Cape Coral	65	36	86.9	63.0	45	14	6	1.1	1.2
Naples	117	64	87.8	55.6	72	23	22	2.6	2.5

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		State: Florida		Evaluation Period: January 1, 1999 TO December 31, 1999					
MA/Assessment Area:	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Data	
	#	% 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:									
Fort Myers/Cape Coral	65	36	86.9	60.7	45	14	6	NA	59.4
Naples	117	64	87.8	55.8	72	23	22	NA	57.8

Table 11b. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		State: Florida		Evaluation Period: January 1, 2000 TO December 31, 2000	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size

	#	% of Total	% of Businesses	% BANK Loans	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000
Full-Review:							
Fort Myers	116	55	86.9	54.3	84	17	15
Naples	95	45	87.8	65.2	69	9	17

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		State: Florida		Evaluation Period: January 1, 1999 TO December 31, 1999					
MA/Assessment Area:	Total Small Farm Loans		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:									
Fort Myers/Cape Coral	0	0.0	91.5	0.0	0	0	0	0.0	0.0
Naples	0	0.0	93.4	0.0	0	0	0	0.0	0.0

Table 12a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		State: Florida		Evaluation Period: January 1, 1999 TO December 31, 1999					
MA/Assessment Area:	Total Small Farm Loans		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Aggregate Data	
	#	% 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:									
Fort Myers/Cape Coral	0	0.0	91.5	0.0	0	0	0	NA	94.1
Naples	0	0.0	93.4	0.0	0	0	0	NA	96.0

Table 12b. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		State: Florida		Evaluation Period: January 1, 2000 TO December 31, 2000		
MA/Assessment Area:	Total Small Farm Loans		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size	
	#	% of Total	% of Farms	% BANK Loans	\$100,000 or Less	>\$100,000 to \$500,000
Full-Review:						

	#	% of Total	% of Farms	% BANK Loans	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$500,000
Full-Review:							
Fort Myers	1	100.0	91.5	100.0	0	1	0
Naples	0	0.0	93.4	0.0	0	0	0

Table 13. Geographic and Borrower Distribution of Consumer Loans

Geographic and Borrower Distribution: CONSUMER LOANS			State: Florida				Evaluation Period: January 1, 1999 TO December 31, 1999											
MA/Assessment Area:	Total Consumer Loans		Geographic Distribution								Borrower Distribution							
			Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans
Full-Review:																		
Fort Myers/Cape Coral	286	48	1.1	0.0	8.3	7.0	80.1	74.5	10.4	18.5	19.3	6.3	18.2	12.6	22.2	18.2	40.4	29.7
Naples	309	52	3.5	0.0	8.2	3.2	59.3	58.6	29.0	38.2	19.5	9.4	18.6	20.4	21.8	24.9	40.0	29.4

Table 13a. Geographic and Borrower Distribution of Consumer Loans

Geographic and Borrower Distribution: CONSUMER LOANS			State: Florida				Evaluation Period: January 1, 2000 TO December 31, 2000											
MA/Assessment Area:	Total Consumer Loans		Geographic Distribution								Borrower Distribution							
			Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers	
	#	% of Total	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans	% of Hhlds	% BANK Loans
Full-Review:																		
Fort Myers	281	46	1.1	0.4	8.3	4.3	80.1	72.2	10.4	23.1	19.3	5.0	18.2	13.9	22.2	21.4	40.4	51.6
Naples	327	54	3.5	0.3	8.2	2.8	59.3	57.8	29.0	39.1	19.5	7.7	18.6	17.7	21.8	19.0	40.0	46.8

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		State: Florida		Evaluation Period: January 1, 1999 to December 31, 2000					
MA/Assessment Areas:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Review:									
Fort Myers/Cape Coral	0	0	7	\$39	7	\$39	5	0	0
Naples	0	0	2	\$766	2	\$766	95	1	788

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								State: Florida		Evaluation Period: January 1, 1999 TO December 31, 2000							
MA/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-Review:																	
Fort Myers/Cape Coral	41	4	40	0	0	75.0 %	25.0 %	1	3	0	0	+1	+1	1.5	9.7	78.5	10.2
Naples	59	6	60	0	0	67.3 %	33.3 %	0	2	0	0	2	0	5.2	10.6	59.1	25.1