

PUBLIC DISCLOSURE

August 11, 2003

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Pointe Bank

Boca Raton, Florida

RSSD ID Number: 1401631

**FEDERAL RESERVE BANK OF ATLANTA
1000 Peachtree Street, N.E.
Atlanta, Georgia 30309-4470**

<p>Note: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the institution does not represent an analysis, conclusion of opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.</p>

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DEFINITIONS

Income Definitions

Throughout this evaluation, the following definitions are used for the various income levels. These levels are defined in the CRA.

Low-Income - An individual income, or median family income for geographies, that is less than 50 percent of the area median income.

Moderate-Income - An individual income, or median family income for geographies, that is at least 50 percent but less than 80 percent of the area median income.

Middle-Income - An individual income, or median family income for geographies, that is at least 80 percent but less than 120 percent of the area median income.

Upper-Income - An individual income, or median family income for geographies, that is 120 percent or more of the area median income.

Other Definitions

ATM -	Automated Teller Machine
BNA-	Block Numbering Area
HUD -	Department of Housing and Urban Development
LTD -	Loan-to-Deposit Ratio
MSA -	Metropolitan Statistical Area
REIS -	Regional Economic Information System

ROUNDING CONVENTION

Because the percentages presented in tables were rounded to the nearest whole number in most cases, some columns may not total exactly 100 percent.

GENERAL INFORMATION

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

This document is an evaluation of the CRA performance of Pointe Bank prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of August 11, 2003. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

Pointe Bank's CRA performance is rated satisfactory. The bank's average LTD ratio for the past fifteen quarters ending March 31, 2003, is **MORE THAN REASONABLE** given the institution's size, financial condition, and competition within the assessment area. A **SUBSTANTIAL MAJORITY** of the bank's loans were extended to individuals and businesses **IN** its assessment area. Based on samples of small business and residential real estate loans, lending to borrowers of different incomes and to businesses of different revenue sizes is **POOR**. The geographic distribution of the bank's loans reflects **REASONABLE** dispersion throughout the entire assessment area. The bank has received no CRA-related complaints since the previous examination. In addition, the bank is in compliance with the substantive provisions of the antidiscrimination laws and regulations.

DESCRIPTION OF INSTITUTION

Pointe Bank is a wholly owned subsidiary of Pointe Financial Corporation, a one-bank holding company. Both companies are headquartered in Boca Raton, Florida. The bank operates nine offices with ATM facilities in Southeast Florida. Two offices located in upper-income census tracts closed, and these closings did not adversely affect low- to moderate-income persons. Of the bank's nine offices, two are located in Palm Beach County, two are located in Broward County, and five are located in Miami-Dade County. As of March 31, 2003, net loans totaled \$219.6 million and deposits totaled \$255.8 million.

Pointe Bank is a full-service community bank that offers residential, consumer, commercial loans and basic retail banking products that are designed to meet the various credit and investment needs of the community.

The bank's loan portfolio has remained stable for most loan types for the past two years. According to the March 31, 2003 Consolidated Reports of Condition and Income (Call Report), the bank had total assets of \$332.2 million. The composition of the loan portfolio, according to the March 31, 2003, December 31, 2002, and December 31, 2001 Call Reports is displayed in the following table:

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	3/31/2003		12/31/2002		12/31/2001	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	\$11,639	5.3%	\$10,559	4.8%	\$8,754	3.9%
Secured by One- to Four- Family Dwellings	\$102,685	46.9%	\$103,474	47.5%	\$102,607	45.4%
Other Real Estate: Farmland	\$0	0.0%	\$0	0.0%	\$0	0.0%
Multifamily	\$1,009	0.5%	\$1,243	0.6%	\$1,807	0.8%
Nonfarm Nonresidential	\$62,136	28.4%	\$57,293	26.3%	\$59,710	26.4%
Commercial and Industrial	\$34,963	16.0%	\$38,081	17.5%	\$44,796	19.8%
Loans to Individuals	\$6,692	3.1%	\$7,351	3.4%	\$8,158	3.6%
Agricultural Loans	\$0	0.0%	\$0	0.0%	\$0	0.0%
Total	\$219,124	100.0%	\$218,001	100.0%	\$225,832	100.0%

This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.

The bank's loan portfolio as of March 31, 2003 consisted primarily of one- to four- family dwelling loans and nonfarm nonresidential real estate loans. This is consistent with the bank's strategy. Pointe Bank generally complies with the CRA. No known legal or other impediments exist that would restrain the bank from meeting the credit needs of its assessment area. The bank received a satisfactory CRA rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta on August 9, 1999.

DESCRIPTION OF ASSESSMENT AREA: Whole Bank

Overview

Pointe Bank has three assessment areas which make up the Whole Bank assessment area: West Palm Beach MSA assessment area, Fort Lauderdale MSA assessment area, and Miami MSA assessment area. The West Palm Beach-Boca Raton (West Palm Beach) MSA includes all of Palm Beach County. The Fort Lauderdale MSA includes all of Broward County. The Miami MSA includes all of Miami-Dade County.

Pointe Bank's overall CRA rating was determined by evaluating the West Palm Beach MSA Assessment Area using full scope examination procedures regarding geographic distribution and lending to borrowers of different income levels and to businesses of different revenue sizes. The Fort Lauderdale MSA assessment area and the Miami MSA assessment area were evaluated using limited scope examination procedures for the same lending categories and were compared to the performance of the overall institution. These areas were considered either **"Consistent"** or **"Not Consistent"** with the overall institution's rating regarding geographic distribution and lending to borrowers of different income levels and to businesses of different revenue sizes. Please refer to the table on page 23 for those ratings.

Financial institutions were required to use 2000 Census data for geo-coding loans beginning January 1, 2003. Because the small business loan sample includes loans that were originated before and after this date, demographic data from both the 1990 and 2000 Census was used for analysis purposes.

For all loans originated prior to January 1, 2003, 1990 census demographic data were used to define the bank's assessment area which consisted of 642 census tracts. 55 of the 642 tracts were low-income tracts, 134 were moderate-income tracts, 260 were middle-income tracts, and 182 were upper-income tracts. 11 census tracts in the Whole Bank assessment area had no income designation.

For all loans originated after December 31, 2002, 2000 census demographic data were used to define the bank's assessment area which consisted of 891 census tracts. 54 of the 891 tracts are low-income tracts, 241 are moderate-income tracts, 320 are middle-income tracts, and 271 are upper-income tracts. 5 census tracts in the Whole Bank assessment area have no income designation. The Whole Bank assessment area does not arbitrarily exclude any low- or moderate-income tracts and is in compliance with the CRA regulation.

DESCRIPTION OF ASSESSMENT AREA: Whole Bank (Continued)

1990 Demographic Data by Census Tract

The following Whole Bank Assessment Area table shows selected demographic information from the 1990 Census for the overall institution.

WHOLE BANK ASSESSMENT AREA								
DEMOGRAPHICS								
Income Categories	Tract Distribution		Families					
	#	%	Families by Tract		Families<Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	55	8.6%	52,253	4.9%	20,977	40.1%	225,454	21.1%
Moderate	134	20.9%	196,878	18.4%	35,613	18.1%	187,778	17.6%
Middle	260	40.5%	497,773	46.6%	38,719	7.8%	224,317	21.0%
Upper	182	28.3%	320,226	30.0%	12,658	4.0%	429,581	40.3%
NA	11	1.7%	0	0.0%	0	0.0%	-	-
Total	642	100.0%	1,067,130	100.0%	107,967	10.1%	1,067,130	100.0%
Housing Units by Tract								
	Total Units	Owner Occupied		Rental Occupied		Vacant		
	#	#	%	#	%	#	%	
Low	97,773	18,705	1.9%	19.1%	66,291	67.8%	12,777	13.1%
Moderate	362,961	154,969	15.5%	42.7%	156,489	43.1%	51,503	14.2%
Middle	846,897	486,883	48.8%	57.5%	247,406	29.2%	112,608	13.3%
Upper	553,943	337,908	33.8%	61.0%	117,665	21.2%	98,370	17.8%
NA	39	22	0.0%	56.4%	17	43.6%	0	0.0%
Total	1,861,613	998,487	100.0%	53.6%	587,868	31.6%	275,258	14.8%
Total Businesses by Tract								
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
	#	%	Under \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	9,580	6.0%	7,523	5.7%	1,792	8.4%	265	5.6%
Moderate	27,534	17.3%	22,515	16.9%	4,267	19.9%	752	16.0%
Middle	63,163	39.7%	54,014	40.6%	7,138	33.3%	2,011	42.7%
Upper	58,278	36.6%	48,490	36.5%	8,125	38.0%	1,663	35.3%
NA	489	0.3%	387	0.3%	84	0.4%	18	0.4%
Total	159,044	100.0%	132,929	100.0%	21,406	100.0%	4,709	100.0%
Percentage of Total Businesses:			83.6%		13.5%		3.0%	

Sources: 1990 Census Data, 2002 Dun & Bradstreet business demographic data.
 NA Tracts are tracts without household or family income.

Population

According to the 1990 Census Data, the total population of the Whole Bank assessment area was 4,056,100, which represents 31.4 percent of the state of Florida's population at 12,937,926 persons.

Income Characteristics

At the time of the 1990 Census Data, there were 1,067,130 families in the Whole Bank assessment area. Of those families, 21.1 percent were low-income, and 17.6 percent were moderate-income. In addition, 10.1 percent of the low-income families in the Whole Bank assessment area had incomes below poverty level. Significant percentages of families in low- and moderate-income tracts had incomes below the poverty level at 40.1 percent and 18.1 percent, respectively.

DESCRIPTION OF ASSESSMENT AREA: Whole Bank (Continued)

Housing Data

At the time of the 1990 Census Data, a majority (53.6 percent) of the housing units in the Whole Bank assessment area were owner-occupied. The median housing value for all types of units in this overall assessment area was \$108,155, which was greater than that of the state of Florida at \$76,487.

Business Size Characteristics

The demographic table on page 4 provides key demographic business data, by revenue size and by census tract for the Whole Bank assessment area, according to the 1990 Census Data,. The table illustrates that, in 2002, according to Dun & Bradstreet, 83.6 percent of the businesses in the assessment area had total annual revenues of less than \$1 million and, therefore, were considered to be small businesses. Since this demographic business data is based on 1990 census tract distributions, it differs slightly from the 2002 Dun & Bradstreet data shown on the 2000 Census Data Table.

DESCRIPTION OF ASSESSMENT AREA: Whole Bank (Continued)

2000 Demographic Data by Census Tract

The following Whole Bank Assessment Area table shows selected demographic information from the 2000 Census for the overall institution.

WHOLE BANK ASSESSMENT AREA								
DEMOGRAPHICS								
Income Categories	Tract Distribution		Families					
	#	%	Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	54	6.1%	46,198	3.6%	17,860	38.7%	274,133	21.5%
Moderate	241	27.0%	335,999	26.4%	61,383	18.3%	225,818	17.7%
Middle	320	35.9%	483,877	38.0%	41,157	8.5%	250,146	19.7%
Upper	271	30.4%	406,370	31.9%	16,717	4.1%	522,347	41.1%
NA	5	0.6%	0	0.0%	0	0.0%	-	-
Total	891	100.0%	1,272,444	100.0%	137,117	10.8%	1,272,444	100.0%
Housing Units by Tract								
	Total Units	Owner Occupied		Rental Occupied		Vacant		
	#	#	%	#	%	#	%	
Low	82,793	17,635	1.4%	21.3%	54,243	65.5%	10,915	13.2%
Moderate	603,803	284,505	22.6%	47.1%	253,105	41.9%	66,193	11.0%
Middle	812,633	503,653	40.0%	62.0%	227,439	28.0%	81,541	10.0%
Upper	650,499	452,189	35.9%	69.5%	112,625	17.3%	85,685	13.2%
NA	21	0	0.0%	0.0%	0	0.0%	21	100.0%
Total	2,149,749	1,257,982	100.0%	58.5%	647,412	30.1%	244,355	11.4%
Total Businesses by Tract								
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
	#	%	Under \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	7,993	5.0%	6,417	4.8%	1,358	6.2%	218	4.6%
Moderate	40,064	24.9%	33,385	24.8%	5,515	25.3%	1,164	24.5%
Middle	59,142	36.7%	49,797	37.0%	7,558	34.6%	1,787	37.5%
Upper	53,492	33.2%	44,684	33.2%	7,229	33.1%	1,579	33.2%
NA	468	0.3%	295	0.2%	161	0.7%	12	0.3%
Total	161,159	100.0%	134,578	100.0%	21,821	100.0%	4,760	100.0%
Percentage of Total Businesses:			83.5%		13.5%		3.0%	

Sources: 2000 Census Data, 2002 Dun & Bradstreet business demographic data.
 NA Tracts are tracts without household or family income.

Population

According to the 2000 Census Data, the population in the Whole Bank assessment area is 5,007,564 persons, representing 31.3 percent of the state of Florida's population at 15,982,378. Between 1990 and 2000, population in the total assessment areas increased by 23.5 percent from 4,056,100 to 5,007,564 persons.

Income Characteristics

According to the 2000 Census Data, there are 1,272,444 families in the Whole Bank assessment area. Of those families, 21.5 percent are low-income and 17.7 percent are moderate-income. In addition, 10.8 percent of the

DESCRIPTION OF ASSESSMENT AREA: Whole Bank (Continued)

low-income families in the Whole Bank assessment area have incomes below poverty level. Significant percentages of families in low- and moderate-income tracts have incomes below the poverty level at 38.7 percent and 18.3 percent, respectively. According to HUD, the estimated 2003 median family income is \$60,800 for the West Palm Beach MSA, \$56,400 for the Fort Lauderdale MSA, and \$43,800 for the Miami MSA.

Housing Data

According to the 2000 Census Data, a majority (58.5 percent) of the housing units in the Whole Bank assessment area are owner-occupied. The median housing value for all types of units in the total assessment area is \$109,981, which is higher than that for the state of Florida at \$93,200. Housing in the assessment area is primarily comprised of one-unit detached dwellings (42.5 percent) and the median age of the housing stock was 24 years.

Business Size Characteristics

The demographic table on page 6 provides key demographic business data, according to the 2000 Census Data, by revenue size and by census tract for the Whole Bank assessment area. The table illustrates that, in 2002, according to Dun & Bradstreet, 83.5 percent of the businesses in the assessment area had total annual revenues of less than \$1 million and, therefore, were considered to be small businesses. Since this demographic business data is based on 2000 census tract distributions, it differs slightly from the 2002 Dun & Bradstreet data shown on the 1990 Census Data Table.

OTHER INFORMATION

Employment Statistics

Information from the U.S. Bureau of Labor Statistics indicates that in the three counties that comprise the Whole Bank assessment area, services and retail trade remain the primary employers. The average annual unemployment rate (not seasonally adjusted) in 2002 was 5.9 percent for Palm Beach County, 6.0 percent for Broward County, and 7.7 percent for Miami-Dade County. The May 2003 unemployment rates (not seasonally adjusted) for Palm Beach, Broward, and Miami-Dade counties were 5.2 percent, 5.4 percent, and 7.0 percent, respectively. The average annual unemployment rate (not seasonally adjusted) for the state of Florida was 5.5 percent for 2002, and was 5.0 percent as of May 2003.

DESCRIPTION OF ASSESSMENT AREA: Whole Bank (Continued)

Competition

Pointe Bank operates in a highly competitive banking market due to the significant presence of banks in the assessment area. The competition comes mainly from FDIC-Insured institutions with branch offices located throughout the three MSAs. Many of these banks are statewide, multi-regional, or national banks. According to deposit market share reports from the FDIC as of June 30, 2002, Pointe Bank ranked 39th in deposit market share in the assessment area, at 0.23 percent (\$235.1 million). The top financial institution had a deposit market share of 19.1 percent. Local competition does not appear to have adversely affected the bank's ability to serve the credit needs of its assessment area.

Community Contacts

As part of the CRA examination, information was obtained from two community contacts regarding local economic development and housing conditions to help identify community credit needs. One contact indicated that there are several opportunities available for financial institutions through participation with a local community development corporation in the bank's assessment area. The other contact gave generally positive remarks about the level of involvement of financial institutions in their area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Whole Bank

Loan-to-Deposit Ratio Analysis

Pointe Bank's LTD ratio is **MORE THAN REASONABLE** given the size, financial condition, and assessment area credit needs. The bank's average net LTD ratio for the fifteen quarters ending March 31, 2003 was 98.6 percent. The bank's ratio has ranged from 84.5 percent to 105.3 percent during that period. The bank's average net LTD ratio was compared with the LTD ratios of six other financial institutions of similar asset size with branch offices in Pointe Bank's assessment area. The average net LTD ratios for these financial institutions ranged from 41.5 percent to 83.0 percent.

Assessment Area Concentration

The bank's 2000, 2001, and 2002 HMDA loans and a sample of 57 small business loans originated between May 2002 and May 2003 were used to evaluate the bank's CRA performance.

The following table provides Whole Bank assessment area lending information for the three years of HMDA loans (2000, 2001, 2002) and the small business loans sampled that were originated in 2002 and 2003. As illustrated in the table below, a **SUBSTANTIAL MAJORITY**, by both number and dollar volume, of the banks HMDA and small business loans were originated **IN** the Whole Bank assessment area.

LENDING INSIDE AND OUTSIDE ASSESSMENT AREA				
Loan Type	IN			
	#	%	\$ (000s)	%
Small Business	52	91.2%	\$10,461	95.1%
HMDA	363	95.0%	\$96,047	88.6%
<i>Total In</i>	<i>415</i>	<i>94.5%</i>	<i>\$106,508</i>	<i>88.8%</i>
	OUT			
	#	%	\$ (000s)	%
Small Business	5	8.8%	\$538	4.9%
HMDA	19	5.0%	\$12,329	11.4%
<i>Total Out</i>	<i>24</i>	<i>5.5%</i>	<i>\$12,867</i>	<i>11.2%</i>

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Whole Bank (Continued)

Weighting

Because HMDA lending makes up the largest portion of the loan portfolio and represents the largest component of loan volume, greater weight was assigned to HMDA lending than to small business lending when evaluating the bank's performance.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

HMDA Lending

To assess Pointe Bank's performance relative to this criterion, 348 HMDA loans originated in 2000, 2001, and 2002 with income provided and 52 small business loans originated within the Whole Bank assessment area were analyzed.

HMDA LOANS BY BORROWER INCOME		
Borrower Income Level	Number	Percent
Low-Income	24	6.9%
Moderate-Income	42	12.1%
Middle-Income	71	20.0%
Upper-Income	211	61.9%
<i>Total</i>	<i>348</i>	<i>100.0%</i>

As illustrated in the table above, of the 348 HMDA loans that were originated in the Whole Bank assessment area, 6.9 percent were originated to low-income borrowers. This percentage is lower than the percentage of low-income families at 21.1 percent in the Whole Bank assessment area. A possible reason for this lending disparity is that 10.1 percent of families in the Whole Bank assessment area are below the poverty level. Typically, families with incomes below the poverty level have difficulty qualifying for residential real estate loans without flexible or innovative loan underwriting standards. Assuming that the 107,967 families below poverty level in the Whole Bank assessment area are categorized as low-income, there are 117,487 non-poverty, low-income families in the Whole Bank assessment area, representing 11 percent of total families. The bank's lending to low-income borrowers at 6.9 percent is still lower than this percentage. In addition, of the 348 HMDA loans, 12.1 percent were originated to moderate-income borrowers. This percentage is also lower than the percentage of moderate-income families at 17.6 percent in the Whole Bank assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Whole Bank (Continued)

A review of the bank's 2000 HMDA lending compared to aggregate lenders indicates that the bank's lending to low-income borrowers at 3.6 percent was lower than the aggregate at 6.2 percent. Lending to moderate-income borrowers at 13.3 percent was also lower than the aggregate at 16.6 percent.

A review of 2001 lending data reveals that the bank's lending to low-income borrowers at 4.0 percent was lower than the aggregate at 5.1 percent and lending to moderate-income borrowers at 13.5 percent was also lower than aggregate at 15.0 percent.

In 2002, the bank's lending to low-income borrowers at 10.4 percent far exceeded that of the aggregate at 5.9 percent. Lending to moderate-income borrowers at 13.0 percent was lower than the aggregate, which was 16.2 percent.

A review of the banks' lending across all three years indicates a significant positive trend in lending to low-income borrowers across all three years. Lending to moderate-income borrowers remained relatively stable compared to the aggregate for all three years. Overall, however, the general trend indicated reducing disparity between the banks lending to low- and moderate-income borrowers and that of the aggregate lenders.

Small Business Lending

Of the 14 small business loans sampled that were originated in 2002, 10 loans (71.4 percent) were extended to businesses with gross annual revenues of less than \$1 million. As noted earlier, 83.6 percent of the businesses in the Whole Bank assessment area are considered to be small businesses. In addition, 4 loans (28.6 percent) of the small business loans originated were in amounts of \$100,000 or less.

SMALL BUSINESS LENDING		
Lending by Business Revenue	Number	Percent
\$1 Million or Less	10	71.4%
Over \$1 Million	4	28.6%
Not Available	0	0.0%
Loan Size:		
\$100,000 or Less	4	28.6%
\$100,001 - \$250,000	2	14.3%
\$250,001 - \$1 Million	8	57.1%
<i>Total</i>	<i>14</i>	<i>100.0%</i>

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Whole Bank (Continued)

Of the 38 small business loans sampled that were originated in 2003, 24 loans (63.2 percent) were extended to businesses with gross annual revenues of less than \$1 million compared to the 83.5 percent of businesses in the Whole Bank assessment area considered to be small businesses. In addition, 21 loans (55.3 percent) of the small business loans originated were in amounts of \$100,000 or less.

SMALL BUSINESS LENDING		
Lending by Business Revenue	Number	Percent
\$1 Million or Less	24	63.2%
Over \$1 Million	14	36.8%
Not Available	0	0.0%
Loan Size:		
\$100,000 or Less	21	55.3%
\$100,001 - \$250,000	8	21.1%
\$250,001 - \$1 Million	9	23.7%
<i>Total</i>	<i>38</i>	<i>100.0%</i>

Based on the data, Pointe Bank’s lending performance reflects POOR penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.

Geographic Distribution of Loans

HMDA Loans

For the HMDA loans (2000, 2001, 2002) and the small business loans sampled that were originated in 2002, 1990 census data were used in the analysis. As stated earlier in the report, the bank’s Whole Bank assessment area consists of 55 (8.6 percent) low-income tracts, 134 (20.9 percent) moderate-income tracts, 260 (40.5 percent) middle-income tracts, and 182 (28.3 percent) upper-income tracts.

GEOGRAPHIC DISTRIBUTION		
Tract Income Level	HMDA	
	#	%
Low-Income	3	0.8%
Moderate-Income	28	7.7%
Middle-Income	120	33.1%
Upper-Income	212	58.4%
<i>Total Assessment Area</i>	<i>363</i>	<i>100.0%</i>

As illustrated above, the bank originated 0.8 percent HMDA loans in low-income census tracts, which is lower than the percentage of owner-occupied units in low-income tracts at 1.9 percent. Only 4.9 percent of the total

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Whole Bank (Continued)

families in the Whole Bank assessment area live in low-income tracts, of which a high percentage (40.1 percent) have incomes below the poverty level. In moderate-income census tracts, the bank originated 7.7 percent HMDA loans, which is lower than the percentage of owner-occupied units in moderate-income tracts at 15.5 percent. 18.4 percent of the total families in the Whole Bank assessment area live in moderate-income tracts, 18.1 percent of which have incomes below the poverty level.

As illustrated in the 2000 aggregate lending comparison table for the Whole Bank assessment area on page 34 of Appendix D, the bank performed below the aggregate in HMDA lending in low-income tracts at 1.2 percent compared to 2.0 percent for the aggregate. In moderate-income tracts, the bank performed below the aggregate in HMDA lending at 10.8 percent compared to 11.9 percent for the aggregate.

As illustrated in the 2001 aggregate lending comparison table for the Whole Bank assessment area on page 34 of Appendix D, the bank performed below the aggregate in HMDA lending in low-income tracts at 0.8 percent compared to 1.3 percent. In moderate-income tracts, the bank performed below the aggregate in HMDA lending at 4.0 percent compared to 10.1 percent for the aggregate.

In 2002, the bank's lending in low-income tracts at 0.6 percent was lower than that of the aggregate at 1.3 percent. Lending in moderate-income tracts at 9.1 percent was also lower than the aggregate at 9.9 percent. From 2000 through 2002, the banks lending in low-income tracts, in relation to the aggregate, deteriorated and remained the same for lending in moderate-income tracts.

Small Business Lending

Of the 14 small business loans sampled that were originated in 2002, no small business loans were originated in low-income census tracts and 7.1 percent were extended to businesses located in moderate-income census tracts. These percentages are lower than the percentages of total businesses according to 1990 census tract distributions, at 6.0 percent and 17.3 percent, respectively. \

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Whole Bank (Continued)

GEOGRAPHIC DISTRIBUTION		
Tract Income Level	Small Business	
	#	%
Low-Income	0	0.0%
Moderate-Income	1	7.1%
Middle-Income	3	21.4%
Upper-Income	10	71.4%
<i>Total Assessment Area</i>	<i>14</i>	<i>100.0%</i>

Of the 38 small business loans sampled that were originated in 2003, no loans were originated in low-income census tracts and 28.9 percent were extended to businesses located in moderate-income census tracts. These percentages are lower than the percentages of total businesses located in low-income census tracts at 5 percent, and higher than the percentages of total businesses located in moderate-income census tracts at 24.9 percent, according to 2000 census tract distributions.

GEOGRAPHIC DISTRIBUTION		
Tract Income Level	Small Business	
	#	%
Low-Income	0	0.0%
Moderate-Income	11	28.9%
Middle-Income	11	28.9%
Upper-Income	16	42.1%
<i>Total Assessment Area</i>	<i>38</i>	<i>100.0%</i>

Overall, the geographic distribution of loans reflects **REASONABLE** dispersion throughout the assessment area.

Complaints

No CRA-related complaints have been received since the previous performance evaluation.

Compliance With Antidiscrimination Laws

The bank is in compliance with the substantive provisions of the antidiscrimination laws and regulations. No evidence of discrimination or the use of illegal credit practices was noted during the review of bank policies and procedures. No practices have the intent or the effect of discouraging applicants for credit.

DESCRIPTION OF ASSESSMENT AREA: West Palm Beach MSA

The West Palm Beach MSA assessment area includes all of Palm Beach County, which is located 71 miles north of Miami, Florida.

1990 Census Demographic Data

The following table provides key demographic information from the 1990 Census that were used in analyzing the bank's CRA performance. Certain components of the data in the table are discussed in the evaluation as they apply to particular parts of the analysis.

WEST PALM BEACH ASSESSMENT AREA								
DEMOGRAPHICS								
2002 HUD Median Family Income (MSA): \$62,800	Tract Distribution		Families					
	#	%	Families by Tract		Families <Poverty as a % of Families by Tract		Families by Family Income	
Income Categories	#	%	#	%	#	%	#	%
Low	10	4.7%	5,781	2.4%	2,042	35.3%	46,086	18.8%
Moderate	45	21.3%	49,675	20.3%	5,985	12.0%	46,583	19.0%
Middle	87	41.2%	115,349	47.2%	5,207	4.5%	55,267	22.6%
Upper	65	30.8%	73,828	30.2%	2,024	2.7%	96,697	39.5%
NA	4	1.9%	0	0.0%	0	0.0%	-	-
Total	211	100.0%	244,633	100.0%	15,258	6.2%	244,633	100.0%
Housing Units by Tract								
	Total Units	Owner Occupied		Rental Occupied		Vacant		
	#	#	%	#	%	#	%	
Low	10,632	2,459	0.9%	23.1%	6,492	61.1%	1,681	15.8%
Moderate	101,650	54,856	20.9%	54.0%	27,722	27.3%	19,072	18.8%
Middle	203,083	121,715	46.3%	59.9%	47,295	23.3%	34,073	16.8%
Upper	146,278	83,859	31.9%	57.3%	21,138	14.5%	41,281	28.2%
NA	22	5	0.0%	22.7%	17	77.3%	0	0.0%
Total	461,665	262,894	100.0%	56.9%	102,664	22.2%	96,107	20.8%
Total Businesses by Tract								
	Tract		Under \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	944	2.3%	755	2.1%	164	3.6%	25	1.9%
Moderate	6,918	16.8%	5,889	16.7%	814	17.7%	215	16.7%
Middle	17,767	43.3%	15,405	43.8%	1,780	38.7%	582	45.2%
Upper	14,960	36.4%	12,755	36.2%	1,758	38.2%	447	34.7%
NA	488	1.2%	386	1.1%	84	1.8%	18	1.4%
Total	41,077	100.0%	35,190	100.0%	4,600	100.0%	1,287	100.0%
Percentage of Total Businesses:				85.7%	11.2%	3.1%		

Sources: 1990 Census Data, 2002 Dun & Bradstreet business demographic data.
 NA Tracts are tracts without household or family income.

Population

According to the 1990 Census Data, the population of the West Palm Beach MSA assessment area was 863,518, which represents 6.7 percent of the state of Florida's population at 12,937,926 persons.

DESCRIPTION OF ASSESSMENT AREA: West Palm Beach MSA (Continued)
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Income Characteristics

At the time of the 1990 Census Data, there were 244,633 families in the West Palm Beach MSA assessment area. Of total families in the West Palm Beach MSA assessment area, 18.8 percent were low-income and 19 percent were moderate-income. Of total families in this assessment area, 15,258 families (6.2 percent) had incomes below the poverty level. Significant percentages of families in low- and moderate-income tracts had incomes below the poverty level at 35.3 percent and 12.0 percent, respectively.

Housing Data

According to the same 1990 Census Data, the majority of the housing units in the West Palm Beach MSA assessment area were owner-occupied (56.9 percent). Housing in this assessment area was primarily comprised of five or more attached units (41.4 percent) and the median age of the housing stock was 14 years.

Business Size Characteristics

According to Dunn & Bradstreet Data for 2002, 85.7 percent of the businesses in the West Palm Beach MSA assessment area had total revenues less than \$1 million, and were therefore considered to be small businesses. Since this demographic business data is based on 1990 census tract distributions, it differs slightly from the 2002 Dun & Bradstreet data shown on the 2000 Census Data Table.

DESCRIPTION OF ASSESSMENT AREA: West Palm Beach MSA (Continued)

2000 Census Demographic Data

The following table provides key demographic information from the 2000 Census that was used in analyzing the bank's CRA performance. Certain components of the data in the table are discussed in the evaluation as they apply to particular parts of the analysis.

WEST PALM BEACH ASSESSMENT AREA								
DEMOGRAPHICS								
2003 HUD Median Family Income (MSA): \$60,800 Income Categories	Tract Distribution		Families					
	#	%	Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
			#	%	#	%	#	%
Low	15	5.7%	10,656	3.5%	3,615	33.9%	60,768	19.9%
Moderate	70	26.4%	80,189	26.2%	9,991	12.5%	56,818	18.6%
Middle	89	33.6%	105,989	34.6%	4,713	4.4%	63,018	20.6%
Upper	89	33.6%	109,168	35.7%	2,726	2.5%	125,398	41.0%
NA	2	0.8%	0	0.0%	0	0.0%	-	-
Total	265	100.0%	306,002	100.0%	21,045	6.9%	306,002	100.0%
Housing Units by Tract								
	Total Units	Owner Occupied		Rental Occupied		Vacant		
		#	%	#	%	#	%	
Low	18,418	5,400	1.5%	29.3%	10,677	58.0%	2,341	12.7%
Moderate	156,639	87,199	24.6%	55.7%	47,038	30.0%	22,402	14.3%
Middle	191,411	128,672	36.3%	67.2%	39,964	20.9%	22,775	11.9%
Upper	189,960	132,753	37.5%	69.9%	22,472	11.8%	34,735	18.3%
NA	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	556,428	354,024	100.0%	63.6%	120,151	21.6%	82,253	14.8%
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
	#	%	Under \$1 Million		Over \$1 Million		Revenue not Reported	
Low	1,840	4.4%	1,522	4.3%	266	5.7%	52	4.0%
Moderate	10,844	26.2%	9,222	26.0%	1,286	27.6%	336	25.9%
Middle	13,815	33.4%	12,013	33.9%	1,356	29.1%	446	34.4%
Upper	14,822	35.8%	12,634	35.6%	1,727	37.0%	461	35.5%
NA	80	0.2%	50	0.1%	28	0.6%	2	0.2%
Total	41,401	100.0%	35,441	100.0%	4,663	100.0%	1,297	100.0%
Percentage of Total Businesses:			85.6%		11.3%		3.1%	

Sources: 2000 Census Data, 2002 Dun & Bradstreet business demographic data.

NA Tracts are tracts without household or family income.

Population

According to the 2000 Census Data, the population of the West Palm Beach MSA assessment area is 1,131,184, which represents 7.1 percent of the state of Florida's population at 15,982,378 persons.

Income Characteristics

According to the 2000 Census Data, there are 306,002 families in the West Palm Beach MSA assessment area. Of total families in the West Palm Beach MSA assessment area, 19.9 percent are low-income and 18.6 percent are moderate-income. Of total families in this assessment area, 21,045 families (6.9 percent) have incomes

DESCRIPTION OF ASSESSMENT AREA: West Palm Beach MSA (Continued)
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below the poverty level. Significant percentages of families in low- and moderate-income tracts had incomes below the poverty level at 33.9 percent and 12.4 percent, respectively.

Housing Data

According to the same 2000 Census Data, the majority of the housing units in the West Palm Beach MSA assessment area are owner-occupied (63.6 percent). Housing in this assessment area is primarily comprised of one-to-four family dwellings (44.1 percent) and the median age of the housing stock is 19 years.

Business Size Characteristics

According to Dunn & Bradstreet Data for 2002, 85.6 percent of the businesses in the West Palm Beach MSA assessment area have total revenues less than \$1 million, and are therefore considered to be small businesses. Since this demographic business data is based on 2000 census tract distributions, it differs slightly from the 2002 Dun & Bradstreet data shown on the 1990 Census Data Table.

OTHER INFORMATION

Employment Characteristics

As previously mentioned, a review of data from the U.S. Bureau of Labor Statistics as of 1996 indicates that the services and retail industries are the largest employers in Palm Beach County. According to the U.S. Labor Statistics data, from 1993 to 1996 the service industry experienced a 20.1 percent increase in employment and the retail industry experienced a 6.3 percent increase in employment. Also, as stated earlier, according to the U.S. Bureau of Labor Statistics, the unemployment rate (not seasonally adjusted) for Palm Beach County was 5.2 percent as of May 2003.

Competition

Pointe Bank is located in a highly competitive banking market. According to the June 30, 2002 FDIC Market Share Report, Pointe Bank had a market share of 0.5 percent in Palm Beach County. The financial institution with the largest market share had 21.3 percent of the market share in Palm Beach County.

CONCLUSION WITH RESPECT TO PERFORMANCE CRITERIA: West Palm Beach MSA

Weighting

Because HMDA lending makes up the larger portion of the loan portfolio and represents the larger component of loan volume compared to small business lending, greater weight was assigned to HMDA lending when evaluating the bank's performance.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

To assess Pointe Bank's performance relative to this criterion, 205 HMDA loans originated within the West Palm Beach MSA assessment area were analyzed. In addition, 5 small business loans originated in 2002 and 10 small business loans originated in 2003 within the West Palm Beach MSA assessment area were analyzed.

HMDA Lending

Of the 205 HMDA loans sampled that were originated in the West Palm Beach MSA assessment area during the review period, 199 had income information. As illustrated in the following table, 3.5 percent were originated to low-income borrowers and 11.6 percent were originated to moderate-income borrowers. These percentages are lower than the percentages of low- and moderate-income families in the West Palm Beach MSA assessment area at 18.8 percent and 19.0 percent, respectively. A possible reason for this lending disparity is that 6.2 percent of families in the West Palm Beach MSA assessment area are below the poverty level. Typically, families with incomes below the poverty level have difficulty qualifying for residential real estate loans without flexible or innovative loan underwriting standards. Assuming that the 15,528 families below poverty level in the West Palm Beach assessment area are categorized as low-income, there are 30,828 non-poverty, low-income families in the West Palm Beach assessment area, representing 12.6 percent of total families. The bank's lending to low-income borrowers at 3.5 percent is significantly lower than this percentage.

HMDA LOANS BY BORROWER INCOME		
Borrower Income Level	Number	Percent
Low-Income	7	3.5%
Moderate-Income	23	11.6%
Middle-Income	42	21.1%
Upper-Income	127	63.8%
<i>Total</i>	199	100.0%

CONCLUSION WITH RESPECT TO PERFORMANCE CRITERIA: West Palm Beach MSA (Continued)

As illustrated in the 2000 aggregate lending comparison table for the West Palm Beach assessment area on page 35 of Appendix E, the bank's level of HMDA lending to low-income borrowers at 2.1 percent was below the aggregate at 8.7 percent. The bank's lending to moderate-income borrowers at 14.6 percent was also lower than the aggregate at 19.1 percent.

As illustrated in the 2001 aggregate lending comparison table for the West Palm Beach assessment area on page 35 of Appendix E, the bank's level of HMDA lending to low-income borrowers at 4.2 percent was below the aggregate at 7.2 percent. The bank's lending to moderate-income borrowers at 9.7 percent was lower than the aggregate at 17.4 percent.

In 2002, the bank's lending to low-income borrowers at 3.5 percent was below the aggregate at 8.1 percent. Lending to moderate-income borrowers at 14.1 percent was lower than the aggregate at 18.4 percent. From 2000 to 2002, the bank improved its lending to low-income borrowers when compared to the aggregate, although lending levels were still significantly below the aggregate. Lending trends to moderate-income borrowers compared to the aggregate remained stable over the three year period.

Small Business Lending

As illustrated in the table below, of the five small business loans sampled that were originated in 2002 in the West Palm Beach MSA assessment area, all five loans (100 percent) were extended to businesses with gross revenues of less than \$1 million. This percentage compares favorably to the percentages of small businesses in the West Palm Beach MSA assessment area at 85.7 percent. In addition, 20 percent of the dollar volume of small business loan originations sampled were in amounts of \$100,000 or less.

SMALL BUSINESS LENDING		
Lending by Business Revenue	Number	Percent
\$1 Million or Less	5	100.0%
Over \$1 Million	0	0.0%
Not Available	0	0.0%
Loan Size:		
\$100,000 or Less	1	20.0%
\$100,001 - \$250,000	2	40.0%
\$250,001 - \$1 Million	2	40.0%
<i>Total</i>	5	100.0%

CONCLUSION WITH RESPECT TO PERFORMANCE CRITERIA: West Palm Beach MSA (Continued)

As illustrated in the table below, of the ten small business loans sampled that were originated in 2003 in the West Palm Beach MSA assessment area, 70 percent were extended to businesses with gross revenues of less than \$1 million. This percentage is lower than the percentage of small businesses in the West Palm Beach MSA assessment area at 85.6 percent. In addition, 60 percent of the dollar volume of small business loan originations sampled were in amounts of \$100,000 or less.

SMALL BUSINESS LENDING		
Lending by Business Revenue	Number	Percent
\$1 Million or Less	7	70.0%
Over \$1 Million	3	30.0%
Not Available	0	0.0%
Loan Size:		
\$100,000 or Less	6	60.0%
\$100,001 - \$250,000	1	10.0%
\$250,001 - \$1 Million	3	30.0%
<i>Total</i>	<i>10</i>	<i>100.0%</i>

Overall, Pointe Bank’s performance reflects **POOR** penetration among individuals of different income (including low- and moderate-income) levels and businesses of different sizes.

Geographic Distribution of Loans

HMDA Loans

Of the 205 HMDA loans sampled that were originated in the West Palm Beach MSA assessment area, 1.5 percent were originated in low-income census tracts and 11.2 percent were originated in moderate-income census tracts. These percentages are lower than the percentages of families in low- and moderate-income tracts at 3.5 percent and 26.2 percent, respectively. Lending in low-income tracts at 1.5 percent is significantly higher than the percentage of total owner-occupied housing units that are in the low-income tracts at 0.9 percent. Lending in the moderate-income tracts at 11.2 percent is lower than the percentage of owner-occupied units in the moderate-income tracts at 20.9 percent.

CONCLUSION WITH RESPECT TO PERFORMANCE CRITERIA: West Palm Beach MSA (Continued)

GEOGRAPHIC DISTRIBUTION		
Tract Income Level	HMDA	
	#	%
Low-Income	3	1.5%
Moderate-Income	23	11.2%
Middle-Income	46	22.4%
Upper-Income	133	64.9%
<i>Total Assessment Area</i>	<i>205</i>	<i>100.0%</i>

The aggregate lending comparison table on page 35 of Appendix E shows that in 2000, the bank significantly exceeded the aggregate in HMDA lending in low- and moderate-income census tracts. 2.1 percent of the bank's loans were made in low-income tracts compared to 0.7 percent for the aggregate. The bank's lending in moderate income tracts at 18.8 percent compares very favorably to that of the aggregate at 13.0 percent.

The 2001 lending data indicate that the bank's lending in low-income tracts at 1.4 percent significantly exceeded the aggregate at 0.5 percent. Lending in moderate-income tracts at 5.6 percent, however, was significantly lower than aggregate at 11.2 percent.

In 2002, the bank's lending in low- and moderate-income tracts exceeded the aggregate. The bank's lending in low-income tracts at 1.2 percent significantly exceeded the aggregate at 0.4 percent. Lending in moderate-income tracts at 11.8 percent exceeded the aggregate at 10.5 percent.

Small Business Lending

Of the five small business loans sampled that were originated in 2002 in the West Palm Beach MSA assessment area, none were originated in low-income tracts compared to 2.3 percent of businesses located in low-income census tracts and 20 percent were originated in moderate-income tracts compared to 16.8 percent of small businesses located in moderate-income census tracts.

CONCLUSION WITH RESPECT TO PERFORMANCE CRITERIA: West Palm Beach MSA (Continued)

GEOGRAPHIC DISTRIBUTION		
Tract Income Level	Small Business	
	#	%
Low-Income	0	0.0%
Moderate-Income	1	20.0%
Middle-Income	0	0.0%
Upper-Income	4	80.0%
<i>Total Assessment Area</i>	5	100.0%

As shown in the table below, of the ten small business loans sampled that were originated the first six months of 2003 in the West Palm Beach MSA assessment area, none were originated in low-income tracts compared to 4.4 percent of small businesses located in low-income census tracts and 20 percent were originated in moderate-income tracts compared to 26.2 percent of small businesses located in moderate-income census tracts.

GEOGRAPHIC DISTRIBUTION		
Tract Income Level	Small Business	
	#	%
Low-Income	0	0.0%
Moderate-Income	2	20.0%
Middle-Income	2	20.0%
Upper-Income	6	60.0%
<i>Total Assessment Area</i>	10	100.0%

Based on the distribution of small businesses in the West Palm Beach MSA assessment area, the bank's lending to small businesses located in low-income census tracts is lacking. However, the banks level of lending compares favorably to the distribution of small businesses located in moderate-income census tracts.

Overall, the geographic distribution of loans reflects **REASONABLE** dispersion throughout the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: LIMITED SCOPE AREAS

The following metropolitan areas were not reviewed using full-scope examination procedures; however, through the use of available facts and data, including performance and demographic information, conclusions regarding performance compared with the overall institution, which did not impact the overall rating are provided. Please refer to the tables in Appendices A, B, C, F, and G for information regarding these areas.

Assessment Areas	Lending to Borrowers of Different Income Levels and to Businesses of Different Revenue Sizes	Geographic Distribution of Loans
<i>Fort Lauderdale MSA</i>	Inconsistent (+)	Inconsistent (-)
<i>Miami MSA</i>	Consistent	Inconsistent (-)

APPENDIX A: Demographic Tables

FORT LAUDERDALE MSA, BROWARD COUNTY, FLORIDA

FORT LAUDERDALE ASSESSMENT AREA								
DEMOGRAPHICS								
2002 HUD Median Family Income (MSA): \$60,200 Income Categories	Tract Distribution		Families					
	#	%	Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
			#	%	#	%	#	%
Low	9	5.5%	8,778	2.6%	3,356	38.2%	66,197	19.6%
Moderate	32	19.5%	56,722	16.8%	8,729	15.4%	61,632	18.3%
Middle	77	47.0%	190,205	56.4%	9,666	5.1%	75,938	22.5%
Upper	42	25.6%	81,579	24.2%	2,279	2.8%	133,517	39.6%
NA	4	2.4%	0	0.0%	0	0.0%	-	-
Total	164	100.0%	337,284	100.0%	24,030	7.1%	337,284	100.0%
	Housing Units by Tract							
	Total Units	Owner Occupied		Rental Occupied		Vacant		
		#	%	#	%	#	%	#
Low	15,656	3,994	1.1%	25.5%	9,677	61.8%	1,985	12.7%
Moderate	111,245	51,762	14.4%	46.5%	41,257	37.1%	18,226	16.4%
Middle	351,740	211,628	58.9%	60.2%	89,777	25.5%	50,335	14.3%
Upper	150,002	92,186	25.6%	61.5%	28,144	18.8%	29,672	19.8%
NA	17	17	0.0%	100.0%	0	0.0%	0	0.0%
Total	628,660	359,587	100.0%	57.2%	168,855	26.9%	100,218	15.9%
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
	#	%	Under \$1 Million		Over \$1 Million		Revenue not Reported	
			#	%	#	%	#	%
Low	2,573	5.0%	1,948	4.5%	544	8.3%	81	4.7%
Moderate	8,405	16.3%	6,967	16.1%	1,229	18.8%	209	12.1%
Middle	25,547	49.6%	21,652	50.0%	3,006	46.0%	889	51.6%
Upper	15,000	29.1%	12,699	29.4%	1,757	26.9%	544	31.6%
NA	1	0.0%	1	0.0%	0	0.0%	0	0.0%
Total	51,526	100.0%	43,267	100.0%	6,536	100.0%	1,723	100.0%
	Percentage of Total Businesses:			84.0%		12.7%		3.3%

Sources: 1990 Census Data, 2002 Dun & Bradstreet business demographic data.
 NA Tracts are tracts without household or family income.

**APPENDIX A: Demographic Tables
 (Continued)**

FORT LAUDERDALE MSA, BROWARD COUNTY, FLORIDA

FORT LAUDERDALE ASSESSMENT AREA DEMOGRAPHICS									
2003 HUD Median Family Income (MSA): \$56,400 Income Categories	Tract Distribution		Families						
	#	%	Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income		
			#	%	#	%	#	%	
	Low	12	4.3%	11,716	2.8%	4,150	35.4%	86,302	20.8%
	Moderate	72	25.8%	104,298	25.2%	15,986	15.3%	75,209	18.2%
	Middle	117	41.9%	179,424	43.3%	11,991	6.7%	84,773	20.5%
	Upper	78	28.0%	118,520	28.6%	3,837	3.2%	167,674	40.5%
	NA	0	0.0%	0	0.0%	0	0.0%	-	-
	Total	279	100.0%	413,958	100.0%	35,964	8.7%	413,958	100.0%
	Housing Units by Tract								
	Total Units	Owner Occupied		Rental Occupied		Vacant			
		#	%	%	#	%	#	%	
Low	19,960	4,649	1.0%	23.3%	13,036	65.3%	2,275	11.4%	
Moderate	203,409	108,262	23.8%	53.2%	69,934	34.4%	25,213	12.4%	
Middle	333,388	208,788	45.9%	62.6%	86,096	25.8%	38,504	11.5%	
Upper	184,286	132,926	29.2%	72.1%	30,754	16.7%	20,606	11.2%	
NA	0	0	0.0%	0.0%	0	0.0%	0	0.0%	
Total	741,043	454,625	100.0%	61.3%	199,820	27.0%	86,598	11.7%	
Total Businesses by Tract and Revenue Size									
	Total Businesses by Tract		Businesses by Tract and Revenue Size						
	#	%	Under \$1 Million		Over \$1 Million		Revenue not Reported		
			#	%	#	%	#	%	
Low	2,326	4.4%	1,837	4.2%	412	6.1%	77	4.4%	
Moderate	13,850	26.3%	11,337	25.6%	2,128	31.5%	385	22.0%	
Middle	23,476	44.5%	19,829	44.8%	2,868	42.4%	779	44.6%	
Upper	13,084	24.8%	11,224	25.4%	1,353	20.0%	507	29.0%	
NA	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	52,736	100.0%	44,227	100.0%	6,761	100.0%	1,748	100.0%	
Percentage of Total Businesses:				83.9%		12.8%		3.3%	

Sources: 2000 Census Data, 2002 Dun & Bradstreet business demographic data.
 NA Tracts are tracts without household or family income.

**APPENDIX A: Demographic Tables
 (Continued)**

MIAMI MSA, MIAMI-DADE COUNTY, FLORIDA

MIAMI ASSESSMENT AREA DEMOGRAPHICS								
2002 HUD Median Family Income (MSA): \$48,200 Income Categories	Tract Distribution		Families					
	#	%	Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	36	13.5%	37,694	7.8%	15,579	41.3%	113,171	23.3%
Moderate	57	21.3%	90,481	18.6%	20,899	23.1%	79,563	16.4%
Middle	96	36.0%	192,219	39.6%	23,846	12.4%	93,112	19.2%
Upper	75	28.1%	164,819	34.0%	8,355	5.1%	199,367	41.1%
NA	3	1.1%	0	0.0%	0	0.0%	-	-
Total	267	100.0%	485,213	100.0%	68,679	14.2%	485,213	100.0%
	Housing Units by Tract							
	Total Units	Owner Occupied		Rental Occupied		Vacant		
	#	#	%	#	%	#	%	
Low	71,485	12,252	3.3%	17.1%	50,122	70.1%	9,111	12.7%
Moderate	150,066	48,351	12.9%	32.2%	87,510	58.3%	14,205	9.5%
Middle	292,074	153,540	40.8%	52.6%	110,334	37.8%	28,200	9.7%
Upper	257,663	161,863	43.0%	62.8%	68,383	26.5%	27,417	10.6%
NA	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total	771,288	376,006	100.0%	48.8%	316,349	41.0%	78,933	10.2%
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
	#	%	Under \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	6,063	9.1%	4,820	8.8%	1,084	10.6%	159	9.4%
Moderate	12,211	18.4%	9,659	17.7%	2,224	21.7%	328	19.3%
Middle	19,849	29.9%	16,957	31.1%	2,352	22.9%	540	31.8%
Upper	28,318	42.6%	23,036	42.3%	4,610	44.9%	672	39.6%
NA	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	66,441	100.0%	54,472	100.0%	10,270	100.0%	1,699	100.0%
	Percentage of Total Businesses:		82.0%		15.5%		2.6%	

Sources: 1990 Census Data, 2002 Dun & Bradstreet business demographic data.
 NA Tracts are tracts without household or family income.

**APPENDIX A: Demographic Tables
 (Continued)**

MIAMI MSA, MIAMI-DADE COUNTY, FLORIDA

MIAMI ASSESSMENT AREA DEMOGRAPHICS								
2003 HUD Median Family Income (MSA): \$43,800 Income Categories	Tract Distribution		Families					
	#	%	Families by Tract		Families < Poverty as a % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	27	7.8%	23,826	4.3%	10,095	42.4%	127,063	23.0%
Moderate	99	28.5%	151,512	27.4%	35,406	23.4%	93,791	17.0%
Middle	114	32.9%	198,464	35.9%	24,453	12.3%	102,355	18.5%
Upper	104	30.0%	178,682	32.3%	10,154	5.7%	229,275	41.5%
NA	3	0.9%	0	0.0%	0	0.0%	-	-
Total	347	100.0%	552,484	100.0%	80,108	14.5%	552,484	100.0%
Housing Units by Tract								
	Total Units	Owner Occupied		Rental Occupied		Vacant		
	#	#	%	#	%	#	%	
Low	44,415	7,586	1.7%	17.1%	30,530	68.7%	6,299	14.2%
Moderate	243,755	89,044	19.8%	36.5%	136,133	55.8%	18,578	7.6%
Middle	287,834	166,193	37.0%	57.7%	101,379	35.2%	20,262	7.0%
Upper	276,253	186,510	41.5%	67.5%	59,399	21.5%	30,344	11.0%
NA	21	0	0.0%	0.0%	0	0.0%	21	100.0%
Total	852,278	449,333	100.0%	52.7%	327,441	38.4%	75,504	8.9%
Total Businesses by Tract and Revenue Size								
	Total Businesses by Tract		Businesses by Tract and Revenue Size					
	#	%	Under \$1 Million		Over \$1 Million		Revenue not Reported	
	#	%	#	%	#	%	#	%
Low	3,827	5.7%	3,058	5.6%	680	6.5%	89	5.2%
Moderate	15,370	22.9%	12,826	23.4%	2,101	20.2%	443	25.8%
Middle	21,851	32.6%	17,955	32.7%	3,334	32.1%	562	32.8%
Upper	25,586	38.2%	20,826	37.9%	4,149	39.9%	611	35.6%
NA	388	0.6%	245	0.4%	133	1.3%	10	0.6%
Total	67,022	100.0%	54,910	100.0%	10,397	100.0%	1,715	100.0%
Percentage of Total Businesses:			81.9%		15.5%		2.6%	

Sources: 2000 Census Data, 2002 Dun & Bradstreet business demographic data.

NA Tracts are tracts without household or family income.

APPENDIX B: Fort Lauderdale MSA Assessment Area Lending Tables (1990 CENSUS DATA)

FORT LAUDERDALE MSA ASSESSMENT AREA

HMDA LOANS BY BORROWER INCOME		
Borrower Income Level	Number	Percent
Low-Income	16	15.4%
Moderate-Income	17	16.3%
Middle-Income	22	21.2%
Upper-Income	44	42.3%
Income Not Available	5	4.8%
<i>Total</i>	<i>104</i>	<i>100.0%</i>

SMALL BUSINESS LENDING		
Lending by Business Revenue	Number	Percent
\$1 Million or Less	0	0.0%
Over \$1 Million	1	100.0%
Not Available	0	0.0%
Loan Size:		
\$100,000 or Less	1	100.0%
\$100,001 - \$250,000	0	0.0%
\$250,001 - \$1 Million	0	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>

**APPENDIX B: Fort Lauderdale MSA Assessment Area Lending Tables (1990 CENSUS DATA)
 (Continued)**

FORT LAUDERDALE MSA ASSESSMENT AREA

GEOGRAPHIC DISTRIBUTION		
Tract Income Level	HMDA	
	#	%
Low-Income	0	0.0%
Moderate-Income	2	1.9%
Middle-Income	60	57.7%
Upper-Income	42	40.4%
<i>Total Assessment Area</i>	<i>104</i>	<i>100.0%</i>

GEOGRAPHIC DISTRIBUTION		
Tract Income Level	Small Business	
	#	%
Low-Income	0	0.0%
Moderate-Income	0	0.0%
Middle-Income	1	100.0%
Upper-Income	0	0.0%
<i>Total Assessment Area</i>	<i>1</i>	<i>100.0%</i>

**APPENDIX B: Fort Lauderdale MSA Assessment Area Lending Tables (2000 CENSUS DATA)
 (Continued))**

FORT LAUDERDALE MSA ASSESSMENT AREA

SMALL BUSINESS LENDING		
Lending by Business Revenue	Number	Percent
\$1 Million or Less	11	57.9%
Over \$1 Million	8	42.1%
Not Available	0	0.0%
Loan Size:		
\$100,000 or Less	11	57.9%
\$100,001 - \$250,000	3	15.8%
\$250,001 - \$1 Million	5	26.3%
<i>Total</i>	<i>19</i>	<i>100.0%</i>

GEOGRAPHIC DISTRIBUTION		
Tract Income Level	Small Business	
	#	%
Low-Income	0	0.0%
Moderate-Income	7	36.8%
Middle-Income	6	31.6%
Upper-Income	6	31.6%
<i>Total Assessment Area</i>	<i>19</i>	<i>100.0%</i>

APPENDIX C: Miami MSA Assessment Area Lending Tables (1990 CENSUS DATA)

MIAMI MSA ASSESSMENT AREA

HMDA LOANS BY BORROWER INCOME		
Borrower Income Level	Number	Percent
Low-Income	1	1.9%
Moderate-Income	2	3.7%
Middle-Income	7	13.0%
Upper-Income	40	74.1%
Income Not Available	4	7.4%
<i>Total</i>	<i>54</i>	<i>100.0%</i>

SMALL BUSINESS LENDING		
Lending by Business Revenue	Number	Percent
\$1 Million or Less	5	62.5%
Over \$1 Million	3	37.5%
Not Available	0	0.0%
Loan Size:		
\$100,000 or Less	2	25.0%
\$100,001 - \$250,000	0	0.0%
\$250,001 - \$1 Million	6	75.0%
<i>Total</i>	<i>8</i>	<i>100.0%</i>

**APPENDIX C: Miami MSA Assessment Area Lending Tables (1990 CENSUS DATA)
 (Continued)**

MIAMI MSA ASSESSMENT AREA

GEOGRAPHIC DISTRIBUTION		
Tract Income Level	HMDA	
	#	%
Low-Income	0	0.0%
Moderate-Income	3	5.6%
Middle-Income	14	25.9%
Upper-Income	37	68.5%
<i>Total Assessment Area</i>	<i>54</i>	<i>100.0%</i>

GEOGRAPHIC DISTRIBUTION		
Tract Income Level	Small Business	
	#	%
Low-Income	0	0.0%
Moderate-Income	0	0.0%
Middle-Income	2	25.0%
Upper-Income	6	75.0%
<i>Total Assessment Area</i>	<i>8</i>	<i>100.0%</i>

**APPENDIX C: Miami MSA Assessment Area Lending Tables (2000 CENSUS DATA)
 (Continued)**

MIAMI MSA ASSESSMENT AREA

SMALL BUSINESS LENDING		
Lending by Business Revenue	Number	Percent
\$1 Million or Less	6	66.7%
Over \$1 Million	3	33.3%
Not Available	0	0.0%
Loan Size:		
\$100,000 or Less	4	44.4%
\$100,001 - \$250,000	4	44.4%
\$250,001 - \$1 Million	1	11.1%
<i>Total</i>	9	100.0%

GEOGRAPHIC DISTRIBUTION		
Tract Income Level	Small Business	
	#	%
Low-Income	0	0.0%
Moderate-Income	2	22.2%
Middle-Income	3	33.3%
Upper-Income	4	44.4%
<i>Total Assessment Area</i>	9	100.0%

APPENDIX D: Whole Bank Aggregate Lending Comparison Tables

WHOLE BANK ASSESSMENT AREA

WHOLE BANK ASSESSMENT AREA								
2000 AGGREGATE LENDING COMPARISON								
EXCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	1	1.2%	2,789	2.0%	3	3.6%	8,817	6.2%
Moderate	9	10.8%	16,954	11.9%	11	13.3%	23,721	16.6%
Middle	24	28.9%	65,883	46.2%	18	21.7%	29,937	21.0%
Upper	49	59.0%	56,978	40.0%	46	55.4%	54,800	38.4%
NA	0	0.0%	10	0.0%	5	6.0%	25,339	17.8%
Total	83	100.0%	142,614	100.0%	83	100.0%	142,614	100.0%

WHOLE BANK ASSESSMENT AREA								
2001 AGGREGATE LENDING COMPARISON								
EXCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	1	0.8%	2,872	1.3%	5	4.0%	10,854	5.1%
Moderate	5	4.0%	21,533	10.1%	17	13.5%	32,013	15.0%
Middle	47	37.3%	97,626	45.7%	29	23.0%	43,078	20.2%
Upper	73	57.9%	91,676	42.9%	71	56.3%	90,425	42.3%
NA	0	0.0%	32	0.0%	4	3.2%	37,369	17.5%
Total	126	100.0%	213,739	100.0%	126	100.0%	213,739	100.0%

WHOLE BANK ASSESSMENT AREA								
2002 AGGREGATE LENDING COMPARISON								
EXCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	1	0.6%	3,638	1.3%	16	10.4%	17,019	5.9%
Moderate	14	9.1%	28,541	9.9%	20	13.0%	46,683	16.2%
Middle	49	31.8%	132,006	45.9%	23	14.9%	60,880	21.2%
Upper	90	58.4%	123,567	42.9%	89	57.8%	118,857	41.3%
NA	0	0.0%	41	0.0%	6	3.9%	44,354	15.4%
Total	154	100.0%	287,793	100.0%	154	100.0%	287,793	100.0%

APPENDIX E: West Palm Beach MSA Aggregate Lending Comparison Tables

WEST PALM BEACH MSA ASSESSMENT AREA

WEST PALM BEACH ASSESSMENT AREA								
2000 AGGREGATE LENDING COMPARISON								
EXCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	1	2.1%	263	0.7%	1	2.1%	3,153	8.7%
Moderate	9	18.8%	4,706	13.0%	7	14.6%	6,911	19.1%
Middle	5	10.4%	17,196	47.6%	8	16.7%	6,882	19.0%
Upper	33	68.8%	13,983	38.7%	30	62.5%	13,811	38.2%
NA	0	0.0%	10	0.0%	2	4.2%	5,401	14.9%
Total	48	100.0%	36,158	100.0%	48	100.0%	36,158	100.0%

WEST PALM BEACH ASSESSMENT AREA								
2001 AGGREGATE LENDING COMPARISON								
EXCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	1	1.4%	262	0.5%	3	4.2%	3,978	7.2%
Moderate	4	5.6%	6,180	11.2%	7	9.7%	9,596	17.4%
Middle	23	31.9%	26,400	48.0%	18	25.0%	11,283	20.5%
Upper	44	61.1%	22,138	40.3%	42	58.3%	22,183	40.3%
NA	0	0.0%	15	0.0%	2	2.8%	7,955	14.5%
Total	72	100.0%	54,995	100.0%	72	100.0%	54,995	100.0%

WEST PALM BEACH ASSESSMENT AREA								
2002 AGGREGATE LENDING COMPARISON								
EXCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	1	1.2%	350	0.4%	3	3.5%	6,332	8.1%
Moderate	10	11.8%	8,257	10.5%	12	14.1%	14,880	18.9%
Middle	18	21.2%	37,795	48.1%	14	16.5%	16,616	21.2%
Upper	56	65.9%	32,119	40.9%	54	63.5%	30,526	38.9%
NA	0	0.0%	22	0.0%	2	2.4%	10,189	13.0%
Total	85	100.0%	78,543	100.0%	85	100.0%	78,543	100.0%

APPENDIX F: Fort Lauderdale MSA Aggregate Lending Comparison Tables

FORT LAUDERDALE MSA ASSESSMENT AREA

FORT LAUDERDALE ASSESSMENT AREA								
2000 AGGREGATE LENDING COMPARISON								
EXCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	583	1.1%	1	4.3%	4,053	7.6%
Moderate	0	0.0%	5,773	10.8%	3	13.0%	10,292	19.2%
Middle	15	65.2%	30,034	56.1%	8	34.8%	11,206	20.9%
Upper	8	34.8%	17,111	32.0%	10	43.5%	18,522	34.6%
NA	0	0.0%	0	0.0%	1	4.3%	9,428	17.6%
Total	23	100.0%	53,501	100.0%	23	100.0%	53,501	100.0%

FORT LAUDERDALE ASSESSMENT AREA								
2001 AGGREGATE LENDING COMPARISON								
EXCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	558	0.7%	2	5.4%	4,588	5.8%
Moderate	1	2.7%	6,827	8.6%	9	24.3%	13,321	16.8%
Middle	20	54.1%	44,722	56.3%	9	24.3%	16,290	20.5%
Upper	16	43.2%	27,293	34.4%	16	43.2%	31,008	39.0%
NA	0	0.0%	17	0.0%	1	2.7%	14,210	17.9%
Total	37	100.0%	79,417	100.0%	37	100.0%	79,417	100.0%

FORT LAUDERDALE ASSESSMENT AREA								
2002 AGGREGATE LENDING COMPARISON								
EXCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	764	0.7%	13	29.5%	7,254	6.8%
Moderate	1	2.3%	9,188	8.7%	7	15.9%	19,493	18.4%
Middle	25	56.8%	60,336	56.9%	6	13.6%	23,012	21.7%
Upper	18	40.9%	35,774	33.7%	15	34.1%	40,422	38.1%
NA	0	0.0%	19	0.0%	3	6.8%	15,900	15.0%
Total	44	100.0%	106,081	100.0%	44	100.0%	106,081	100.0%

APPENDIX G: Miami MSA Aggregate Lending Comparison Tables

MIAMI MSA ASSESSMENT AREA

MIAMI ASSESSMENT AREA								
2000 AGGREGATE LENDING COMPARISON								
EXCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	1,943	3.7%	1	8.3%	1,611	3.0%
Moderate	0	0.0%	6,475	12.2%	1	8.3%	6,518	12.3%
Middle	4	33.3%	18,653	35.2%	2	16.7%	11,849	22.4%
Upper	8	66.7%	25,884	48.9%	6	50.0%	22,467	42.4%
NA	0	0.0%	0	0.0%	2	16.7%	10,510	19.8%
Total	12	100.0%	52,955	100.0%	12	100.0%	52,955	100.0%

MIAMI ASSESSMENT AREA								
2001 AGGREGATE LENDING COMPARISON								
EXCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	2,052	2.6%	0	0.0%	2,288	2.9%
Moderate	0	0.0%	8,526	10.7%	1	5.9%	9,096	11.5%
Middle	4	23.5%	26,504	33.4%	2	11.8%	15,505	19.5%
Upper	13	76.5%	42,245	53.3%	13	76.5%	37,234	46.9%
NA	0	0.0%	0	0.0%	1	5.9%	15,204	19.2%
Total	17	100.0%	79,327	100.0%	17	100.0%	79,327	100.0%

MIAMI ASSESSMENT AREA								
2002 AGGREGATE LENDING COMPARISON								
EXCLUDING HUD REPORTERS								
HMDA ORIGINATIONS & PURCHASES								
Income Category	By Tract Income				By Borrower Income			
	Bank		Aggregate		Bank		Aggregate	
	#	%	#	%	#	%	#	%
Low	0	0.0%	2,524	2.4%	0	0.0%	3,433	3.3%
Moderate	3	12.0%	11,096	10.8%	1	4.0%	12,310	11.9%
Middle	6	24.0%	33,875	32.8%	3	12.0%	21,252	20.6%
Upper	16	64.0%	55,674	54.0%	20	80.0%	47,909	46.4%
NA	0	0.0%	0	0.0%	1	4.0%	18,265	17.7%
Total	25	100.0%	103,169	100.0%	25	100.0%	103,169	100.0%