

PUBLIC DISCLOSURE

June 6, 2005

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**First Florida Bank
Naples, Florida**

RSSD ID Number: 2808358

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

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 or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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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
FDIC - Federal Deposit Insurance Corporation
HUD - Department of Housing and Urban Development
LPO - Loan Production Office
MSA - Metropolitan Statistical Area

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 First Florida Bank prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of June 6, 2005. 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.

First Florida Bank's average loan-to-deposit (LTD) ratio for the past sixteen quarters ending December 31, 2004 is **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 **OUTSIDE** its assessment area. However, a substantial majority of the loans (61percent) will be located inside the bank's redefined assessment area as the bank is in the process of opening a new full service branch in the Fort Myers MSA. Based on HMDA loans, lending reflects **REASONABLE** penetration among individuals of different incomes. The geographic distribution of loans reflects a **POOR** dispersion throughout the assessment area, particularly in the moderate-income census tracts. 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

First Florida Bank is the sole subsidiary of Banking Corp. of Florida, a bank holding company that was established in August 1999. The bank operates three branches with ATMs. The main branch is in Naples, Florida. A second office, the Lely Branch, opened in Naples in September 2003. The bank also opened an office in Winter Park, Florida in June 2002. In addition, the bank has two loan production offices (LPOs), one in Winter Park, Florida, and another one in Fort Myers, Florida. In May 2004, the bank relocated its operations department to an Operations Center in Naples.

Of the bank's three branches, one is located in a moderate-income census tract, another is located in a middle-income census tract, and the third branch is located in an upper-income census tract. The bank opened two branches during the review period. According to the Consolidated Reports of Condition and Income (Call Report), between March 31, 2001 and December 31, 2004, total assets increased by 633 percent, from \$37.3 million to \$273.4 million. Total assets were \$310.1 million as of March 31, 2005. During the same period, net loans increased by 602 percent, from \$25.4 million to \$178.3 million, and total deposits increased by 694.5 percent, from \$31.1 million to \$247.1 million.

First Florida Bank is a full-service community bank that offers a variety of deposit and credit products, including consumer loans, home equity lines of credit, fixed and adjustable rate mortgage loans, construction and construction/permanent loans, and commercial loans. The composition of the loan portfolio, according to the December 31, 2004, December 31, 2003, and December 31, 2002 Call Reports, is displayed in the following table:

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	12/31/2004		12/31/2003		12/31/2002	
	\$ (000s)	%	\$ (000s)	%	\$ (000s)	%
Construction and Development	\$105,232	42.1%	\$37,950	26.1%	\$19,932	20.9%
Secured by One- to Four- Family Dwellings	\$13,561	5.4%	\$14,884	10.2%	\$23,563	24.7%
Other Real Estate: Farmland	\$280	0.1%	\$0	0.0%	\$0	0.0%
Multifamily	\$5,460	2.2%	\$3,308	2.3%	\$2,668	2.8%
Nonfarm Nonresidential	\$98,764	39.5%	\$70,530	48.4%	\$39,198	41.1%
Commercial and Industrial	\$24,338	9.7%	\$17,971	12.3%	\$9,098	9.5%
Loans to Individuals	\$2,096	0.8%	\$1,009	0.7%	\$1,012	1.1%
Agricultural Loans	\$0	0.0%	\$0	0.0%	\$0	0.0%
Total	\$249,731	100.0%	\$145,652	100.0%	\$95,471	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.

DESCRIPTION OF INSTITUTION (Continued)

The bank's loan portfolio as of December 31, 2004 consisted primarily of construction and development loans (42.1 percent) and nonfarm nonresidential loans (39.5 percent). The table reveals that the most significant loan growth by dollar amount since December 31, 2002 was in construction and development loans, which increased by \$85.3 million (428 percent), followed by nonfarm nonresidential loans, which increased by \$59.6 million (152 percent). This is consistent with the bank's strategy. No known legal or financial impediments exist that would prevent the bank from meeting the credit needs of its assessment area. The bank received a satisfactory rating during its previous CRA evaluation, dated April 30, 2001, conducted by the Federal Reserve Bank of Atlanta.

DESCRIPTION OF ASSESSMENT AREA: Whole Bank

Overview

Since the previous evaluation, First Florida Bank has expanded its assessment area from part of Collier County to include Lake, Osceola, Orange, and Seminole counties. The Naples MSA assessment area, which is in the Naples-Marco Island MSA, includes all of Collier County except Immokalee and the Everglades. The Orlando MSA assessment area is the entire Orlando MSA, which includes all of Lake, Osceola, Orange, and Seminole counties.

First Florida Bank's overall CRA rating was determined by evaluating the Naples MSA assessment area using full scope examination procedures regarding geographic distribution and lending to borrowers of different income. The Orlando MSA assessment area was evaluated using limited scope examination procedures for the same lending categories and comparing them to the rating for the overall institution. This area was considered either **"Consistent"** or **"Not Consistent"** with the overall institution's rating regarding geographic distribution and lending to borrowers of different income. Please refer to the table on page 34 for those ratings.

HMDA loans for this analysis include loans that were originated before and after the 2000 census data became available. As a result, loans originated prior to and including 2002 were analyzed using 1990 census data, and 2003 and 2004 loans were analyzed using data from the 2000 census.

For all loans originated prior to January 1, 2003, 1990 census demographic data was used to define the bank's assessment areas, which consisted of 247 census tracts. 10 of the 247 census tracts were low-income tracts, 49 were moderate-income tracts, 127 were middle-income tracts, and 60 were upper-income tracts. One census tract in the assessment area had no income designation.

For all loans originated after January 1, 2003, 2000 census data was used to define the bank's assessment area, which consisted of 374 census tracts. 9 of the 374 tracts are low-income tracts, 83 are moderate-income tracts, 173 are middle-income tracts, and 109 are upper-income tracts. The bank's assessment area does not arbitrarily exclude any low- or moderate-income areas and is in compliance with the CRA regulation.

DESCRIPTION OF ASSESSMENT AREA: Whole Bank (Continued)

1990 Census Demographic Data

The following table provides key demographic information from the 1990 census that was used in analyzing the bank's CRA performance.

Assessment Area Demographics
 Assessment Area: Whole Bank (1990 Census)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	10	4.0	6,181	1.7	2,358	38.1	64,030	17.5
Moderate-income	49	19.8	59,309	16.2	7,701	13.0	71,499	19.5
Middle-income	127	51.4	211,270	57.6	12,269	5.8	87,462	23.9
Upper-income	60	24.3	89,738	24.5	2,451	2.7	143,507	39.2
Tract not reported	1	0.4	0	0.0	0	0.0	0	0.0
Total Assessment Area	247	100.0	366,498	100.0	24,779	6.8	366,498	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	10,990	2,685	0.8	24.4	7,005	63.7	1,300	11.8
Moderate-income	102,294	53,716	15.8	52.5	34,115	33.3	14,463	14.1
Middle-income	356,475	191,824	56.5	53.8	115,203	32.3	49,448	13.9
Upper-income	141,542	91,023	26.8	64.3	25,787	18.2	24,732	17.5
Tract not reported	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	611,301	339,248	100.0	55.5	182,110	29.8	89,943	14.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,051	2.2	1,670	2.0	288	3.8	93	2.6
Moderate-income	13,729	14.7	11,993	14.6	1,246	16.3	490	13.9
Middle-income	52,392	56.2	46,228	56.4	4,150	54.3	2,014	57.2
Upper-income	24,982	26.8	22,107	27.0	1,954	25.6	921	26.2
Unknown-income	7	0.0	5	0.0	2	0.0	0	0.0
Total Assessment Area	93,161	100.0	82,003	100.0	7,640	100.0	3,518	100.0
	Percentage of Total Businesses:			88.0		8.2		3.8

DESCRIPTION OF ASSESSMENT AREA: Whole Bank (Continued)

1990 Census Population Information

According to population data from the 1990 census, the bank's assessment area had a total population of 1,356,608 persons, which represented 10.5 percent of the state of Florida's population of 12,937,926 persons.

Income Characteristics

At the time of the 1990 census, there were 366,498 families in the assessment area. Of those families, 17.5 percent were low-income families and 19.5 percent were moderate-income families. In addition, 6.8 percent of the total families in the assessment area had income below the poverty level. The majority of these families were concentrated in the moderate- and middle-income census tracts.

Housing Data

According to 1990 census data, the majority (55.5 percent) of the housing units in the bank's assessment area were owner-occupied. Housing data indicate that, of the 611,301 housing units in the bank's assessment area, one-to-four family dwellings comprised 78.2 percent of the total units. The median age of the housing stock in the assessment area was 13 years, which is lower than that of the state of Florida at 16 years. The median housing value in the assessment area was \$84,382, which is higher than that of the state of Florida at \$76,488.

Business Size Characteristics

The 1990 demographic table also provides key demographic data by revenue size and by census tract in the bank's assessment area. The table illustrates that, according to the 1990 census, 88 percent of the businesses in the bank's assessment area had total annual revenues of \$1 million or less and, therefore, were considered to be small businesses.

DESCRIPTION OF ASSESSMENT AREA: Whole Bank (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.

Assessment Area Demographics
 Assessment Area: Whole Bank (2000 Census)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	2.4	6,057	1.2	2,397	39.6	90,566	18.4
Moderate-income	83	22.2	101,535	20.6	13,917	13.7	92,581	18.8
Middle-income	173	46.3	240,010	48.7	15,709	6.5	110,708	22.4
Upper-income	109	29.1	145,696	29.5	4,258	2.9	199,443	40.4
Total Assessment Area	374	100.0	493,298	100.0	36,281	7.4	493,298	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	10,759	2,714	0.6	25.2	6,891	64.0	1,154	10.7
Moderate-income	175,323	82,768	17.0	47.2	71,794	40.9	20,761	11.8
Middle-income	400,523	242,523	49.8	60.6	113,026	28.2	44,974	11.2
Upper-income	231,184	159,279	32.7	68.9	40,562	17.5	31,343	13.6
Total Assessment Area	817,789	487,284	100.0	59.6	232,273	28.4	98,232	12.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,654	1.8	1,392	1.7	208	2.7	54	1.5
Moderate-income	17,745	19.0	15,289	18.6	1,749	22.9	707	20.1
Middle-income	44,658	47.9	39,473	48.1	3,471	45.4	1,714	48.7
Upper-income	29,102	31.2	25,846	31.5	2,213	29.0	1,043	29.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area		100.0		100.0		100.0		100.0
	Percentage of Total Businesses:			88.0		8.2		3.8

DESCRIPTION OF ASSESSMENT AREA: Whole Bank (Continued)

2000 Census Population Information

According to population data from the 2000 census, 1,863,867 persons live within the bank's assessment area, representing approximately 11.7 percent of the state of Florida's population of 15,982,378 persons. Between the 1990 and 2000 census, the assessment area population increased by 37.4 percent or 507,259 persons, compared to a 23.5 percent increase for the state of Florida overall.

Income Characteristics

The 2000 census data indicate that there are 493,298 families in the assessment area. Of those families, 18.4 percent are low-income, 18.8 percent are moderate-income, 22.4 percent are middle-income, and 40.4 percent are upper-income. Of total families in the assessment area, 36,281 families (7.4 percent) have incomes below the poverty level. According to HUD, the estimated 2002, 2003, and 2004 median family income for the Naples-Marco Island MSA was \$69,800, \$61,400, and \$61,900 respectively, and the HUD estimated 2002, 2003, and 2004 median family income for the Orlando MSA was \$54,700, \$52,700, and \$54,300 respectively.

Housing Data

According to 2000 census data, 59.6 percent of the housing units in the bank's assessment area are owner-occupied. Housing in the assessment area is primarily comprised of one-to-four family dwellings (77.8 percent), multi-unit dwellings of five families or more (22.2 percent), and mobile homes (9.1 percent). Vacant units represent 12 percent of housing units in the assessment area. The median age of the housing stock in the assessment area has risen to 17 years. The median housing value in the assessment area increased to \$105,557 in 2000, while the median housing value in the state of Florida increased to \$93,200. In March 2005, the median sales price of a single-family home in Collier County was \$430,800.

Business Size Characteristics

The demographic table on page 7 provides key demographic business data by census tract income categories within First Florida Bank's assessment area. The table illustrates that, according to the 2000 census, 88 percent of the businesses in the bank's assessment area have total revenues of \$1 million or less, and, therefore are considered to be small businesses.

DESCRIPTION OF ASSESSMENT AREA: Whole Bank (Continued)

OTHER INFORMATION

Employment Characteristics

A review of 2000 data from the Bureau of Economic Analysis suggests that the retail trade industry and the service industry remain the largest employers in both the Naples-Marco Island MSA and the Orlando MSA. Tourism and retail are the main industries in Orlando. The following table shows the annual unemployment rates for the Naples-Marco Island MSA, the Orlando MSA, and the state of Florida from 2001 to 2004, according to the Bureau of Labor Statistics (BLS).

UNEMPLOYMENT RATES FOR YEARS 2001 – 2004				
Area	2001	2002	2003	2004
Naples-Marco Island MSA	3.9%	4.8%	4.8%	4.0%
Orlando MSA	4.0%	5.7%	5.2%	4.6%
State of Florida	4.6%	5.7%	5.3%	4.8%

Competition

First Florida Bank operates in a highly competitive financial 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 assessment area. Many of these banks are statewide, multi-regional, or national banks. According to deposit market share reports from the FDIC as of June 30, 2004, First Florida Bank ranked 32nd in deposit market share in the assessment area at 0.57 percent (\$191.8 million). The top financial institution had a deposit market share of 20.5 percent. Local competition does not appear to have adversely affected the bank's ability to grow and 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 conditions and community credit needs. Both contacts stated that a need still exists for local banks to offer flexible affordable housing loans, as well as to offer credit counseling and financial education to low- and moderate-income persons. Both contacts also indicated that prices of existing homes have gone up significantly. One contact noted that the average value for a single-family home in Naples has risen from less than \$200,000 in 2000 to around \$400,000 in 2005. In addition, limited land and the high cost of

DESCRIPTION OF ASSESSMENT AREA: Whole Bank (Continued)

building materials have made the cost of building a new home increase appreciably. Both contacts felt that banks could do more in the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Whole Bank

Scope of Examination

HMDA loans were considered in determining the CRA rating. The examination review period covered HMDA loans originated between January 1, 2002 and December 31, 2004. Because the HMDA loans for the CRA analysis include loans that were originated before and after 2000 census data became available, 2002 loans were analyzed using 1990 census data, and 2003 and 2004 loans were analyzed using 2000 census data. For all loans originated prior to January 1, 2003, 1990 census demographic data were used to describe the bank's assessment area. For all loans originated in 2003 and 2004, 2000 census demographic data were used to describe the bank's assessment area.

Loan-to-Deposit Ratio

First Florida Bank's average LTD ratio is considered **REASONABLE** given the bank's size, financial condition, and assessment area credit needs. Based on information from the bank's Call Reports, the bank's LTD ratio as of December 31, 2004 was 72.2 percent. The bank's average LTD ratio for the sixteen-quarter period ended December 31, 2004 was 80.3 percent. This ratio was comparable to the average LTD ratios of 22 peer banks in the assessment area at 79.4 percent. The peer bank ratios ranged from 28.3 percent to 107.4 percent.

Assessment Area Concentration

A **SUBSTANTIAL MAJORITY** of the bank's lending occurred **OUTSIDE** its assessment area. The following table shows the distribution of loans that were originated during the review period inside and outside the bank's assessment area, by number of loans and dollar amount, according to loan type.

Lending Inside and Outside the Assessment Area

Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	5	55.6	\$834	49.7	4	44.4	\$845	50.3
Home Purchase -	62	13.7	\$15,092	15.8	390	86.3	\$80,492	84.2
Multi-Family Housing	1	11.1	\$310	17.6	8	88.9	\$1,455	82.4
Refinancing	54	37.8	\$11,991	47.2	89	62.2	\$13,422	52.8
Total HMDA related	122	19.9	\$28,227	22.7	491	80.1	\$96,214	77.3
TOTAL LOANS	122	19.9	\$28,227	22.7	491	80.1	\$96,214	77.3

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

As indicated by the preceding table, 19.9 percent of the bank's HMDA loans were made inside the bank's assessment area. Also, 22.7 percent of the loan dollar volume associated with these loans was inside the bank's assessment area. The high level of lending outside the bank's assessment was primarily due to the fact that the bank originated a substantial portion of its HMDA loans in Lee County (Fort Myers MSA) where the bank has an LPO. The bank currently has no branches or deposit taking facilities in the Fort Myers MSA; therefore, it could not delineate the Fort Myers MSA as part of its assessment area. However, had the Fort Myers MSA been delineated as part of the bank's assessment area, then the majority (61.3 percent) of the bank's HMDA loans and 52.2 percent of the loan dollar volume associated with these loans would have been inside the bank's assessment area. The bank made a business decision to react to loan demand in Fort Myers by establishing an LPO. The bank is in the process of establishing a full service branch in Fort Myers.

Lending to Borrowers of Different Incomes

To evaluate First Florida Bank's performance in lending to borrowers of different incomes, HMDA loans within the bank's assessment area were analyzed. Borrower income classifications were assigned in accordance with the definitions presented earlier in this report. For this analysis, lending to businesses of different sizes was not considered because gross revenue information was unavailable.

Analysis Based on 1990 Census Data

For this analysis, 34 HMDA loans originated in the bank's assessment area between January 1, 2002 and December 31, 2002 were compared to 1990 census demographic data and to the aggregate's lending.

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

Loan Distribution Table

For Loan Years Up To 2002
 Assessment Area: Whole Bank (1990 Census)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	2	14.3%	240	7.5%
Moderate	2	14.3%	294	9.1%	1	7.1%	100	3.1%
<i>Low/Moderate Total</i>	2	14.3%	294	9.1%	3	21.4%	340	10.6%
Middle	6	42.9%	1,110	34.5%	2	14.3%	356	11.1%
Upper	6	42.9%	1,813	56.4%	9	64.3%	2,521	78.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	14	100.0%	3,217	100.0%	14	100.0%	3,217	100.0%
Refinance								
Low	0	0.0%	0	0.0%	2	11.1%	365	9.3%
Moderate	0	0.0%	0	0.0%	3	16.7%	447	11.4%
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	5	27.8%	812	20.8%
Middle	10	55.6%	1,631	41.7%	3	16.7%	237	6.1%
Upper	8	44.4%	2,282	58.3%	10	55.6%	2,864	73.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	18	100.0%	3,913	100.0%	18	100.0%	3,913	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	110	57.3%	0	0.0%	0	0.0%
Upper	1	50.0%	82	42.7%	2	100.0%	192	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	2	100.0%	192	100.0%	2	100.0%	192	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	4	11.8%	605	8.3%
Moderate	2	5.9%	294	4.0%	4	11.8%	547	7.5%
<i>Low/Moderate Total</i>	2	5.9%	294	4.0%	8	23.5%	1,152	15.7%
Middle	17	50.0%	2,851	38.9%	5	14.7%	593	8.1%
Upper	15	44.1%	4,177	57.0%	21	61.8%	5,577	76.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	34	100.0%	7,322	100.0%	34	100.0%	7,322	100.0%

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

Lending to Borrowers of Different Incomes

As illustrated in the preceding table, 11.8 percent of the HMDA loans were originated to low-income borrowers, while 17.5 percent of families in the assessment area are classified as low-income. Also, 24,779 families (6.8 percent) of the families inside the bank's assessment area have incomes below the poverty level. 11.8 percent of the bank's HMDA loans originated in 2002 were made to moderate-income borrowers, which is less than the percentage of moderate-income families in the assessment at 19.5 percent.

The bank's HMDA lending to low-income borrowers at 11.8 percent compares favorably to the aggregate's lending at 6.6 percent. The bank's 11.8 percent HMDA lending to moderate-income borrowers is lower than the aggregate's lending of 17.3 percent to moderate-income borrowers.

Analysis Based on 2000 Census Data

To evaluate First Florida Bank's performance in lending to borrowers of different incomes, 88 HMDA loans originated within the bank's assessment area from January 1, 2003 through December 31, 2004 were analyzed. Loans originated in 2003 and 2004 were analyzed separately because of the Office of Management and Budget's (OMB) MSA definition changes in 2004. Borrower income classifications were assigned in accordance with the definitions presented earlier in this report. For this analysis, the distribution of HMDA loans by borrower income level was compared to 2000 census demographic data and to the aggregate's lending.

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

Loan Distribution Table

Loan Year 2003
 Assessment Area: Whole Bank (2000 Census)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	1	3.6%	50	0.6%
Moderate	2	7.1%	412	5.2%	5	17.9%	571	7.2%
<i>Low/Moderate Total</i>	2	7.1%	412	5.2%	6	21.4%	621	7.8%
Middle	15	53.6%	4,831	60.5%	2	7.1%	425	5.3%
Upper	11	39.3%	2,737	34.3%	17	60.7%	6,021	75.5%
Unknown	0	0.0%	0	0.0%	3	10.7%	913	11.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	7,980	100.0%	28	100.0%	7,980	100.0%
Refinance								
Low	0	0.0%	0	0.0%	1	4.3%	108	2.0%
Moderate	0	0.0%	0	0.0%	5	21.7%	603	11.3%
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	6	26.1%	711	13.3%
Middle	8	34.8%	1,117	20.8%	2	8.7%	181	3.4%
Upper	15	65.2%	4,242	79.2%	15	65.2%	4,467	83.4%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	23	100.0%	5,359	100.0%	23	100.0%	5,359	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	2	100.0%	590	100.0%	2	100.0%	590	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	590	100.0%	2	100.0%	590	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	2	3.8%	158	1.1%
Moderate	2	3.8%	412	3.0%	10	18.9%	1,174	8.4%
<i>Low/Moderate Total</i>	2	3.8%	412	3.0%	12	22.6%	1,332	9.6%
Middle	23	43.4%	5,948	42.7%	4	7.5%	606	4.4%
Upper	28	52.8%	7,569	54.3%	34	64.2%	11,078	79.5%
Unknown	0	0.0%	0	0.0%	3	5.7%	913	6.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	53	100.0%	13,929	100.0%	53	100.0%	13,929	100.0%

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

Loan Distribution Table

For Loan Years From 2004
 Assessment Area: Whole Bank (2000 Census)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	5.0%	420	10.8%	4	20.0%	434	11.1%
<i>Low/Moderate Total</i>	<i>1</i>	<i>5.0%</i>	<i>420</i>	<i>10.8%</i>	<i>4</i>	<i>20.0%</i>	<i>434</i>	<i>11.1%</i>
Middle	12	60.0%	2,305	59.2%	2	10.0%	282	7.2%
Upper	7	35.0%	1,170	30.0%	12	60.0%	2,299	59.0%
Unknown	0	0.0%	0	0.0%	2	10.0%	880	22.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	20	100.0%	3,895	100.0%	20	100.0%	3,895	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	7.7%	110	4.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>1</i>	<i>7.7%</i>	<i>110</i>	<i>4.0%</i>
Middle	6	46.2%	1,170	43.0%	4	30.8%	573	21.1%
Upper	7	53.8%	1,549	57.0%	7	53.8%	1,606	59.1%
Unknown	0	0.0%	0	0.0%	1	7.7%	430	15.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	13	100.0%	2,719	100.0%	13	100.0%	2,719	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	100.0%	52	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	52	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	52	100.0%	1	100.0%	52	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	310	100.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>1</i>	<i>100.0%</i>	<i>310</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	310	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	310	100.0%	1	100.0%	310	100.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	2	5.7%	730	10.5%	5	14.3%	544	7.8%
<i>Low/Moderate Total</i>	<i>2</i>	<i>5.7%</i>	<i>730</i>	<i>10.5%</i>	<i>5</i>	<i>14.3%</i>	<i>544</i>	<i>7.8%</i>
Middle	19	54.3%	3,527	50.6%	6	17.1%	855	12.3%
Upper	14	40.0%	2,719	39.0%	20	57.1%	3,957	56.7%
Unknown	0	0.0%	0	0.0%	4	11.4%	1,620	23.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	35	100.0%	6,976	100.0%	35	100.0%	6,976	100.0%

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

Lending to Borrowers of Different Incomes

As illustrated on the table on page 14, of the 53 HMDA loans originated in 2003, 2 (3.8 percent) were originated to low-income borrowers, compared to the percentage of low-income families in the assessment area at 18.4 percent. Also, 18.9 percent of the HMDA loans were originated to moderate-income borrowers, which is slightly more than the percentage of moderate-income families at 18.8 percent in the assessment area. Of the families inside the assessment area, 7.4 percent have incomes below the poverty level.

First Florida Bank's HMDA lending to low-income borrowers at 3.8 percent and lending to moderate-income borrowers at 18.9 percent is reasonable when compared to the aggregate's lending of 5.1 percent to low-income borrowers and 15.5 percent to moderate-income borrowers.

As illustrated on the table on page 15, of the 35 HMDA loans originated in 2004, none were originated to low-income borrowers, although 18.4 percent of the families in the assessment area are considered low-income. In addition, 14.3 percent of the HMDA lending was made to moderate-income borrowers, which is less than the percentage of moderate-income families in the assessment area at 18.8 percent. The aggregate's lending for 2004 HMDA data was not available during the evaluation period.

Based on the analysis, First Florida Bank's lending performance reflects **REASONABLE** penetration among individuals of different income levels.

Geographic Distribution of Loans

To evaluate First Florida Bank's performance concerning the geographic distribution of loans, HMDA loans originated within the bank's assessment area were compared to the demographic information available and to the aggregate's lending in low- and moderate-income census tracts. For all loans originated in 2002, 1990 census data were used for the analysis of the geographic distribution of loans. For all loans originated in 2003 and 2004, 2000 census data were used.

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

Analysis Based on 1990 Census Data

As shown in the table on page 12, of the 34 HMDA loans originated in the bank's assessment area in 2002, none were originated in the low-income census tracts and 2 (5.9 percent) were originated in moderate-income tracts. Based on 1990 census data, there were 10 low-income census tracts and 49 moderate-income census tracts in the bank's assessment area. The low-income tracts and the moderate-income tracts contained 1.7 percent and 16.2 percent of total families in the bank's assessment area, respectively. Also, 40.6 percent of the families below the poverty level are in low- and moderate-income tracts. Of the owner-occupied units in the bank's assessment area, 0.8 percent and 15.8 percent are in low- and moderate-income census tracts, respectively.

The bank's lack of HMDA lending in low-income census tracts and 5.9 percent of lending in moderate-income census tracts falls below the aggregate's lending of 0.3 percent in low-income census tracts and 8.2 percent in moderate-income census tracts. The bank's level of performance is poor considering the aggregate's lending, and the number of owner-occupied units in the assessment area.

Analysis Based on 2000 Census Data

As shown in the table on page 14, of the 53 HMDA loans originated in the bank's assessment area in 2003, none were originated in the low-income census tracts and 2 (3.8 percent) were originated in moderate-income tracts. Based on 2000 census data, there were 9 low-income census tracts and 83 moderate-income census tracts in the bank's assessment area. The low-income tracts and the moderate-income tracts contained 1.2 percent and 20.6 percent of total families in the bank's assessment area, respectively. Also, 45 percent of the families below the poverty level are in low- and moderate-income tracts. Of the owner-occupied units in the bank's assessment area, 0.6 percent and 17 percent are in low- and moderate-income census tracts, respectively.

The bank's lack of HMDA lending in low-income census tracts is below the aggregate's lending in low-income census tracts at 0.3 percent. The bank's HMDA lending of 3.8 percent in moderate-income census tracts is significantly below the aggregate's lending of 13.2 percent in moderate-income tracts. The bank's level of performance is poor for the low- and moderate-income tracts considering the aggregate's lending, and the number of owner-occupied units in the assessment area.

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

In 2004, of the 35 HMDA loans originated in the bank's assessment area, none were originated in the low-income census tracts and 2 (5.7 percent) were originated in moderate-income tracts. Based on 2000 census data, low-income tracts and the moderate-income tracts contained 1.2 percent and 20.6 percent of total families in the bank's assessment area, respectively. Of the owner-occupied units in the bank's assessment area, 0.6 percent and 17 percent are in low- and moderate-income census tracts, respectively. The aggregate's lending for 2004 HMDA data was not available during the evaluation period. Again, the bank's level of performance is poor for the low- and moderate-income tracts considering the number of owner-occupied units in the assessment area and the percentage of families in the low- and moderate-income tracts.

Based on the above analysis, the overall geographic distribution of loans reflects **POOR** dispersion throughout the bank's 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.

Qualified Community Development Activities

Since the previous examination, First Florida Bank has become a participant in both the Small Business Administration's (SBA) 7a and 504 loan programs. First Florida Bank originated 42 SBA guaranteed loans totaling \$8.6 million during the review period. According to management, the bank has several other SBA loans in various stages of due diligence and/or underwriting.

DESCRIPTION OF ASSESSMENT AREA: Naples MSA

Overview

The Naples MSA assessment area includes part of Collier County, which is located in Southwest Florida. The assessment area excludes the areas of Immokalee and the Everglades, which consist of six census tracts.

HMDA loans for this analysis include loans that were originated before and after the 2000 census data became available. As a result, loans originated in 2002 were analyzed using 1990 census data, and 2003 and 2004 loans were analyzed using data from the 2000 census.

For all loans originated prior to January 1, 2003, 1990 census demographic data were used to define the Naples MSA assessment area, which consisted of 26 census tracts. One of the 26 census tracts was a low-income tract, one was a moderate-income tract, 12 were middle-income tracts, and 12 were upper-income tracts.

For all loans originated after January 1, 2003, 2000 census data were used to define the Naples MSA assessment area, which consisted of 46 census tracts. One of the 46 tracts is a low-income tract, 7 are moderate-income tracts, 22 are middle-income tracts, and 16 are upper-income tracts.

DESCRIPTION OF ASSESSMENT AREA: Naples MSA (Continued)

1990 Census Demographic Data

The following table provides key demographic information from the 1990 census that was used in analyzing the Naples MSA assessment area.

Assessment Area Demographics
 Assessment Area: Naples (1990 Census)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	3.8	256	0.6	113	44.1	5,641	14.2
Moderate-income	1	3.8	1,256	3.2	111	8.8	7,785	19.6
Middle-income	12	46.2	25,519	64.1	994	3.9	9,507	23.9
Upper-income	12	46.2	12,773	32.1	235	1.8	16,871	42.4
Total Assessment Area	26	100.0	39,804	100.0	1,453	3.7	39,804	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	438	99	0.2	22.6	296	67.6	43	9.8
Moderate-income	3,146	1,242	3.1	39.5	381	12.1	1,523	48.4
Middle-income	49,765	24,743	61.2	49.7	11,384	22.9	13,638	27.4
Upper-income	33,755	14,367	35.5	42.6	3,571	10.6	15,817	46.9
Total Assessment Area	87,104	40,451	100.0	46.4	15,632	17.9	31,021	35.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	116	0.8	105	0.8	8	0.7	3	0.5
Moderate-income	137	1.0	126	1.0	5	0.4	6	1.1
Middle-income	8,897	61.8	7,907	62.2	647	57.4	343	60.1
Upper-income	5,258	36.5	4,572	36.0	467	41.4	219	38.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	14,408	100.0	12,710	100.0	1,127	100.0	571	100.0
Percentage of Total Businesses:			88.2		7.8		4.0	

DESCRIPTION OF ASSESSMENT AREA: Naples MSA (Continued)

1990 Census Population Information

According to population data from the 1990 census, the Naples MSA assessment area had a total population of 131,756 persons, which represented 1 percent of the state of Florida's population of 12,937,926 persons.

Income Characteristics

At the time of the 1990 census, there were 39,804 families in the assessment area. Of those families, 14.2 percent were low-income families and 19.6 percent were moderate-income families. In addition, 3.7 percent of the total families in the assessment area had income below the poverty level. The majority of these families were concentrated in the low-income census tract.

Housing Data

According to 1990 census data, 46.4 percent of the housing units in the bank's assessment area were owner-occupied. Housing data indicate that, of the 87,104 housing units in the Naples MSA assessment area, one-to-four family dwellings comprised 60.5 percent of the total units. The median age of the housing stock in the assessment area was 10 years, which is lower than that of the state of Florida at 16 years. The median housing value in the assessment area was \$127,029, which is higher than that of the state of Florida at \$76,488. According to the Greater Naples Chamber of Commerce, the 2004 average market value of a single-family home in Collier County was \$398,228.

Business Size Characteristics

The 1990 demographic table also provides key demographic data by revenue size and by census tract in the Naples MSA assessment area. The table illustrates that, according to the 1990 census, 88.2 percent of the businesses in the Naples MSA assessment area had total annual revenues of \$1 million or less, and, therefore, were considered to be small businesses.

DESCRIPTION OF ASSESSMENT AREA: Naples MSA (Continued)

2000 Census Demographic Data

The following table provides key demographic information from the 2000 census that was used in analyzing the Naples MSA assessment area.

Assessment Area Demographics
 Assessment Area: Naples (2000 Census)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.2	305	0.5	85	27.9	10,643	16.4
Moderate-income	7	15.2	9,530	14.7	950	10.0	12,144	18.7
Middle-income	22	47.8	31,485	48.5	1,494	4.7	13,580	20.9
Upper-income	16	34.8	23,600	36.4	692	2.9	28,553	44.0
Total Assessment Area	46	100.0	64,920	100.0	3,221	5.0	64,920	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	656	124	0.2	18.9	313	47.7	219	33.4
Moderate-income	17,496	8,369	11.5	47.8	5,437	31.1	3,690	21.1
Middle-income	59,493	35,719	49.1	60.0	10,109	17.0	13,665	23.0
Upper-income	56,593	28,524	39.2	50.4	5,714	10.1	22,355	39.5
Total Assessment Area	134,238	72,736	100.0	54.2	21,573	16.1	39,929	29.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low-income	136	0.9	121	0.9	10	0.9	5	0.9
Moderate-income	1,394	9.6	1,262	9.9	72	6.4	60	10.5
Middle-income	6,492	44.8	5,765	45.1	483	42.7	244	42.6
Upper-income	6,458	44.6	5,627	44.0	567	50.1	264	46.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area		100.0		100.0		100.0		100.0
	Percentage of Total Businesses:			88.2		7.8		4.0

DESCRIPTION OF ASSESSMENT AREA: Naples MSA (Continued)

2000 Census Population Information

According to population data from the 2000 census, 219,306 persons live within the Naples MSA assessment area, representing approximately 1.4 percent of the state of Florida's population of 15,982,378 persons. Between the 1990 and 2000 census, the assessment area population increased by 66.4 percent or 87,550 persons, compared to a 23.5 percent increase for the state of Florida overall.

Income Characteristics

The 2000 census data indicate that there are 64,920 families in the assessment area. Of those families, 16.4 percent are low-income, 18.7 percent are moderate-income, 20.9 percent are middle-income, and 44 percent are upper-income. Of total families in the assessment area, 3,221 families (5 percent) have incomes below the poverty level. As stated earlier, 2002, 2003, and 2004 estimated HUD median family income for the Naples-Marco Island MSA were \$69,800, \$61,400, and \$61,900 respectively.

Housing Data

According to 2000 census data, 54.2 percent of the housing units in the Naples MSA assessment area are owner-occupied. Housing in the assessment area is primarily comprised of one-to-four family dwellings (60.9 percent), multi-unit dwellings of five families or more (39.1 percent), and mobile homes (5.9 percent). Vacant units represent 29.7 percent of housing units in the assessment area. The median age of the housing stock in the assessment area has risen to 14 years. The median housing value in the assessment area increased to \$155,421 in 2000, while the median housing value in the state of Florida increased to \$93,200.

Business Size Characteristics

The demographic table on page 22 provides key demographic business data by census tract income categories within Naples MSA assessment area. The table illustrates that, according to the 2000 census, 88.2 percent of the businesses in the Naples MSA assessment area have total revenues of \$1 million or less, and, therefore are considered to be small businesses.

DESCRIPTION OF ASSESSMENT AREA: Naples MSA (Continued)

OTHER INFORMATION

Employment Characteristics

A review of 2000 data from the Bureau of Economic Analysis suggests that the retail trade industry and the service industry remain the largest employers in the Naples-Marco Island MSA. According to the Bureau of Labor Statistics (BLS), the annual unemployment rate for the Naples-Marco Island MSA for 2001, 2002, 2003, and 2004 were 3.9 percent, 4.8 percent, 4.8 percent, and 4 percent, respectively.

Competition

First Florida Bank's two branches located in the Naples-Marco Island MSA are in a highly competitive banking market. According to the June 30, 2004 FDIC Market Share Report, the bank ranked 12th in deposit market share in the assessment area at 1.94 percent (\$157.9 million). The financial institution with the largest market share had 20.3 percent of the market share in the MSA. Local competition does not appear to have adversely affected the bank's ability to grow and serve the credit needs of its assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Naples MSA

Lending to Borrowers of Different Incomes

To evaluate First Florida Bank's performance in lending to borrowers of different incomes and businesses of different sizes, HMDA loans within the Naples MSA assessment area were analyzed. Borrower income classifications were assigned in accordance with the definitions presented earlier in this report. For the analysis, the lending to businesses of different sizes was not considered because gross revenue information was unavailable.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Naples MSA (Continued)

Analysis Based on 1990 Census Data

For this analysis, 28 HMDA loans originated in the Naples MSA assessment area in 2002 was compared to 1990 census demographic data and to the aggregate's lending.

Loan Distribution Table

For Loan Years Up To 2002
 Assessment Area: Naples AA (1990 Census)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	2	20.0%	240	11.2%
Moderate	0	0.0%	0	0.0%	1	10.0%	100	4.7%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>3</i>	<i>30.0%</i>	<i>340</i>	<i>15.9%</i>
Middle	5	50.0%	811	37.8%	1	10.0%	191	8.9%
Upper	5	50.0%	1,332	62.2%	6	60.0%	1,612	75.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	2,143	100.0%	10	100.0%	2,143	100.0%
Refinance								
Low	0	0.0%	0	0.0%	2	12.5%	365	12.5%
Moderate	0	0.0%	0	0.0%	3	18.8%	447	15.3%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>5</i>	<i>31.3%</i>	<i>812</i>	<i>27.8%</i>
Middle	9	56.3%	1,338	45.8%	3	18.8%	237	8.1%
Upper	7	43.8%	1,582	54.2%	8	50.0%	1,871	64.1%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	2,920	100.0%	16	100.0%	2,920	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	50.0%	110	57.3%	0	0.0%	0	0.0%
Upper	1	50.0%	82	42.7%	2	100.0%	192	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	192	100.0%	2	100.0%	192	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	4	14.3%	605	11.5%
Moderate	0	0.0%	0	0.0%	4	14.3%	547	10.4%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>8</i>	<i>28.6%</i>	<i>1,152</i>	<i>21.9%</i>
Middle	15	53.6%	2,259	43.0%	4	14.3%	428	8.1%
Upper	13	46.4%	2,996	57.0%	16	57.1%	3,675	69.9%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	5,255	100.0%	28	100.0%	5,255	100.0%

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Naples MSA (Continued)

Lending to Borrowers of Different Incomes

As illustrated in the preceding table, 14.3 percent of the HMDA loans were originated to both low- and moderate-income borrowers. 14.2 percent and 19.6 percent of families in the assessment area are classified as low-income and moderate-income, respectively. Also, 1,453 families (3.7 percent) of the families inside the Naples MSA assessment area have incomes below the poverty level.

The bank's 14.3 percent HMDA lending to low-income borrowers compares very favorably to the aggregate's lending of 7.2 percent to low-income borrowers and is somewhat lower than aggregate lending to moderate-income borrowers at 17 percent.

Analysis Based on 2000 Census Data

To evaluate the bank's performance in lending to borrowers of different incomes in the Naples MSA assessment area, 57 HMDA loans originated within the Naples MSA assessment area from January 1, 2003 through December 31, 2004 were analyzed. Loans originated in 2003 and 2004 were analyzed separately because of the Office of Management and Budget's (OMB) MSA definition changes in 2004. Borrower income classifications were assigned in accordance with the definitions presented earlier in this report. For this analysis, the distribution of HMDA loans by borrower income level was compared to 2000 census demographic data and to the aggregate's lending.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Naples MSA (Continued)

Loan Distribution Table

Loan Year 2003
 Assessment Area: Naples AA (2000 Census)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	5	29.4%	571	11.2%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>5</i>	<i>29.4%</i>	<i>571</i>	<i>11.2%</i>
Middle	7	41.2%	2,696	52.7%	2	11.8%	425	8.3%
Upper	10	58.8%	2,419	47.3%	8	47.1%	3,304	64.6%
Unknown	0	0.0%	0	0.0%	2	11.8%	815	15.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17	100.0%	5,115	100.0%	17	100.0%	5,115	100.0%
Refinance								
Low	0	0.0%	0	0.0%	1	4.5%	108	2.0%
Moderate	0	0.0%	0	0.0%	4	18.2%	521	9.9%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>5</i>	<i>22.7%</i>	<i>629</i>	<i>11.9%</i>
Middle	7	31.8%	1,035	19.6%	2	9.1%	181	3.4%
Upper	15	68.2%	4,242	80.4%	15	68.2%	4,467	84.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	22	100.0%	5,277	100.0%	22	100.0%	5,277	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	2	100.0%	590	100.0%	2	100.0%	590	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	590	100.0%	2	100.0%	590	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	1	2.4%	108	1.0%
Moderate	0	0.0%	0	0.0%	9	22.0%	1,092	9.9%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>10</i>	<i>24.4%</i>	<i>1,200</i>	<i>10.9%</i>
Middle	14	34.1%	3,731	34.0%	4	9.8%	606	5.5%
Upper	27	65.9%	7,251	66.0%	25	61.0%	8,361	76.1%
Unknown	0	0.0%	0	0.0%	2	4.9%	815	7.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	41	100.0%	10,982	100.0%	41	100.0%	10,982	100.0%

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Naples MSA (Continued)

Loan Distribution Table

For Loan Years From 2004
 Assessment Area: Naples AA (2000 Census)

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	20.0%	216	11.8%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>2</i>	<i>20.0%</i>	<i>216</i>	<i>11.8%</i>
Middle	5	50.0%	1,048	57.4%	1	10.0%	95	5.2%
Upper	5	50.0%	777	42.6%	7	70.0%	1,514	83.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	1,825	100.0%	10	100.0%	1,825	100.0%
Refinance								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	25.0%	110	12.4%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>1</i>	<i>25.0%</i>	<i>110</i>	<i>12.4%</i>
Middle	2	50.0%	345	39.0%	1	25.0%	145	16.4%
Upper	2	50.0%	540	61.0%	1	25.0%	200	22.6%
Unknown	0	0.0%	0	0.0%	1	25.0%	430	48.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	885	100.0%	4	100.0%	885	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	100.0%	52	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	1	100.0%	52	100.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	52	100.0%	1	100.0%	52	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	100.0%	310	100.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>1</i>	<i>100.0%</i>	<i>310</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	100.0%	310	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	310	100.0%	1	100.0%	310	100.0%
HMDA Totals								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	6.3%	310	10.1%	3	18.8%	326	10.6%
<i>Low/Moderate Total</i>	<i>1</i>	<i>6.3%</i>	<i>310</i>	<i>10.1%</i>	<i>3</i>	<i>18.8%</i>	<i>326</i>	<i>10.6%</i>
Middle	8	50.0%	1,445	47.0%	2	12.5%	240	7.8%
Upper	7	43.8%	1,317	42.9%	9	56.3%	1,766	57.5%
Unknown	0	0.0%	0	0.0%	2	12.5%	740	24.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16	100.0%	3,072	100.0%	16	100.0%	3,072	100.0%

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Naples MSA (Continued)

Lending to Borrowers of Different Incomes

As illustrated on the table on page 28, of the 41 HMDA loans originated in 2003, one (2.4 percent) was originated to a low-income borrower, compared to the percentage of low-income families in the assessment area at 16.4 percent. Also, 22 percent of the HMDA loans were originated to moderate-income borrowers, which is more than the percentage of moderate-income families at 18.7 percent in the assessment area. Of the families inside the assessment area, 5 percent have incomes below the poverty level.

First Florida Bank's HMDA lending to low-income borrowers at 2.4 percent is less than the aggregate's lending to low-income borrowers at 4.3 percent. Lending to moderate-income borrowers at 22 percent is significantly higher than aggregate lending to moderate-income borrowers at 14.1 percent.

As illustrated on the table on page 29, of the 16 HMDA loans originated in 2004, none were originated to low-income borrowers, although 16.4 percent of the families in the assessment area are considered low-income. In addition, 18.8 percent of the HMDA lending was made to moderate-income borrowers, which is slightly more than the percentage of moderate-income families in the assessment area at 18.7 percent. Aggregate 2004 HMDA lending was not available during the evaluation period.

Based on the analysis, First Florida Bank's lending performance in the Naples MSA assessment area reflects **REASONABLE** penetration among individuals of different income levels.

Geographic Distribution of Loans

To evaluate First Florida Bank's performance concerning the geographic distribution of loans, HMDA loans originated within the Naples MSA assessment area were compared to the demographic information available and to the aggregate's lending in low- and moderate-income census tracts. For all loans originated in 2002, 1990 census data were used for the analysis of the geographic distribution of loans. For all loans originated in 2003 and 2004, 2000 census data were used.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Naples MSA (Continued)

Analysis Based on 1990 Census Data

As shown in the table on page 26, of the 28 HMDA loans originated in the bank's assessment area in 2002, none were originated in either low- or moderate-income census tracts. Based on 1990 census data, there was one low-income census tract and one moderate-income census tract in the Naples MSA assessment area. The low-income tract and the moderate-income tract contained 0.6 percent and 3.2 percent of total families in the Naples MSA assessment area, respectively. Also, 15.4 percent of the families below the poverty level are in low- and moderate-income tracts. Of the owner-occupied units in the bank's assessment area, 0.2 percent and 3.1 percent are in low- and moderate-income census tracts, respectively.

The bank's lack of HMDA lending in low- and moderate-income census tracts is below the aggregate's lending of 0.1 percent (38 loans) in the low-income census tract and 1.7 percent in the moderate-income census tract. The bank's level of performance is poor, while considering the low level of aggregate lending competition, the number of owner-occupied units in the assessment area, and the percentage of families below the poverty level in the low- and moderate-income tracts.

Analysis Based on 2000 Census Data

As shown in the table on page 28, of the 41 HMDA loans originated in the bank's assessment area in 2003, none were originated in either the low-income census tract or the moderate-income tracts. Based on 2000 census data, there was one low-income census tract and 7 moderate-income census tracts in the Naples MSA assessment area. The low-income tract and the moderate-income tracts contained 0.5 percent and 14.7 percent of total families in the Naples MSA assessment area, respectively. Also, 32.1 percent of the families below the poverty level are in low- and moderate-income tracts. Of the owner-occupied units in the bank's assessment area, 0.2 percent and 11.5 percent are in low- and moderate-income census tracts, respectively.

The bank's lack of HMDA lending in both the low-income census tract and moderate-income census tracts is below the aggregate's lending of 0.2 percent in low-income census tract and 9.7 percent in moderate-income census tracts. The bank's level of performance is poor for the low- and moderate-income tracts considering the aggregate's lending, the number of owner-occupied units in the assessment area, and the percentage of families below the poverty level in the low- and moderate-income tracts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: Naples MSA (Continued)

In 2004, of the 16 HMDA loans originated in the Naples MSA assessment area, none were originated in the low-income census tract and one (6.3 percent) was originated in the moderate-income tracts. Based on 2000 census data, low-income tracts and the moderate-income tracts contained 0.5 percent and 14.7 percent of total families in the Naples MSA assessment area, respectively. Of the owner-occupied units in the Naples MSA assessment area, 0.2 percent and 11.5 percent are in low- and moderate-income census tracts, respectively. The aggregate's lending for 2004 HMDA data was not available during the evaluation period. The bank's level of performance is poor for the low- and moderate-income tracts considering the number of owner-occupied units in the assessment area and the percentage of families below the poverty level in the low- and moderate-income tracts.

Based on the above analysis, the overall geographic distribution of loans reflects **POOR** dispersion throughout the Naples MSA assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA: LIMITED SCOPE AREA

The Orlando MSA assessment area was 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 and B for information regarding these areas.

Assessment Area	Lending To Borrowers of Different Income Levels	Geographic Distribution
Orlando MSA	Consistent	Not consistent (+)

APPENDIX A: Orlando MSA Demographic Tables

Assessment Area Demographics

Assessment Area: Orlando (1990 Census)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	9	4.1	5,925	1.8	2,245	37.9	58,389	17.9
Moderate-income	48	21.7	58,053	17.8	7,590	13.1	63,714	19.5
Middle-income	115	52.0	185,751	56.9	11,275	6.1	77,955	23.9
Upper-income	48	21.7	76,965	23.6	2,216	2.9	126,636	38.8
Tract not reported	1	0.5	0	0.0	0	0.0	0	0.0
Total Assessment Area	221	100.0	326,694	100.0	23,326	7.1	326,694	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	10,552	2,586	0.9	24.5	6,709	63.6	1,257	11.9
Moderate-income	99,148	52,474	17.6	52.9	33,734	34.0	12,940	13.1
Middle-income	306,710	167,081	55.9	54.5	103,819	33.8	35,810	11.7
Upper-income	107,787	76,656	25.7	71.1	22,216	20.6	8,915	8.3
Tract not reported	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	524,197	298,797	100.0	57.0	166,478	31.8	58,922	11.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,935	2.5	1,565	2.3	280	4.3	90	3.1
Moderate-income	13,592	17.3	11,867	17.1	1,241	19.1	484	16.4
Middle-income	43,495	55.2	38,321	55.3	3,503	53.8	1,671	56.7
Upper-income	19,724	25.0	17,535	25.3	1,487	22.8	702	23.8
Unknown-income	7	0.0	5	0.0	2	0.0	0	0.0
Total Assessment Area		100.0		100.0		100.0		100.0
	Percentage of Total Businesses:			88.0		8.3		3.7

APPENDIX A: Orlando MSA Demographic Tables (Continued)

Assessment Area Demographics

Assessment Area: Orlando (2000 Census)

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	2.4	5,752	1.3	2,312	40.2	79,923	18.7
Moderate-income	76	23.2	92,005	21.5	12,967	14.1	80,437	18.8
Middle-income	151	46.0	208,525	48.7	14,215	6.8	97,128	22.7
Upper-income	93	28.4	122,096	28.5	3,566	2.9	170,890	39.9
Total Assessment Area	328	100.0	428,378	100.0	33,060	7.7	428,378	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	10,103	2,590	0.6	25.6	6,578	65.1	935	9.3
Moderate-income	157,827	74,399	17.9	47.1	66,357	42.0	17,071	10.8
Middle-income	341,030	206,804	49.9	60.6	102,917	30.2	31,309	9.2
Upper-income	174,591	130,755	31.5	74.9	34,848	20.0	8,988	5.1
Total Assessment Area	683,551	414,548	100.0	60.6	210,700	30.8	58,303	8.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,518	1.9	1,271	1.8	198	3.0	49	1.7
Moderate-income	16,351	20.8	14,027	20.3	1,677	25.8	647	22.0
Middle-income	38,166	48.5	33,708	48.7	2,988	45.9	1,470	49.9
Upper-income	22,644	28.8	20,219	29.2	1,646	25.3	779	26.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area		100.0		100.0		100.0		100.0
	Percentage of Total Businesses:			88.0		8.3		3.7

APPENDIX B: Orlando MSA Assessment Area Lending Tables

Loan Distribution Table

For Loan Years Up To 2002
 Assessment Area: Orlando AA (1990 Census)

Income Categories	By Tract Income				HMDA		By Borrower Income		
	#	%	\$(000s)	%	#	%	\$(000s)	%	
Home Purchase									
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate	2	50.0%	294	27.4%	0	0.0%	0	0.0%	
<i>Low/Moderate Total</i>	2	50.0%	294	27.4%	0	0.0%	0	0.0%	
Middle	1	25.0%	299	27.8%	1	25.0%	165	15.4%	
Upper	1	25.0%	481	44.8%	3	75.0%	909	84.6%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	4	100.0%	1,074	100.0%	4	100.0%	1,074	100.0%	
Refinance									
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Middle	1	50.0%	293	29.5%	0	0.0%	0	0.0%	
Upper	1	50.0%	700	70.5%	2	100.0%	993	100.0%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	2	100.0%	993	100.0%	2	100.0%	993	100.0%	
Home Improvement									
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Multi-Family									
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
HMDA Totals									
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate	2	33.3%	294	14.2%	0	0.0%	0	0.0%	
<i>Low/Moderate Total</i>	2	33.3%	294	14.2%	0	0.0%	0	0.0%	
Middle	2	33.3%	592	28.6%	1	16.7%	165	8.0%	
Upper	2	33.3%	1,181	57.1%	5	83.3%	1,902	92.0%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	6	100.0%	2,067	100.0%	6	100.0%	2,067	100.0%	

APPENDIX B: Orlando MSA Assessment Area Lending Tables (Continued)

Loan Distribution Table

Loan Year 2003
 Assessment Area: Orlando AA (2000 Census)

Income Categories	By Tract Income				HMDA		By Borrower Income		
	#	%	\$(000s)	%	#	%	\$(000s)	%	
Home Purchase									
Low	0	0.0%	0	0.0%	1	9.1%	50	1.7%	
Moderate	2	18.2%	412	14.4%	0	0.0%	0	0.0%	
<i>Low/Moderate Total</i>	2	18.2%	412	14.4%	1	9.1%	50	1.7%	
Middle	8	72.7%	2,135	74.5%	0	0.0%	0	0.0%	
Upper	1	9.1%	318	11.1%	9	81.8%	2,717	94.8%	
Unknown	0	0.0%	0	0.0%	1	9.1%	98	3.4%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Total</i>	11	100.0%	2,865	100.0%	11	100.0%	2,865	100.0%	
Refinance									
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate	0	0.0%	0	0.0%	1	100.0%	82	100.0%	
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	1	100.0%	82	100.0%	
Middle	1	100.0%	82	100.0%	0	0.0%	0	0.0%	
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Total</i>	1	100.0%	82	100.0%	1	100.0%	82	100.0%	
Home Improvement									
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Multi-Family									
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Low/Moderate Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Total</i>	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
HMDA Totals									
Low	0	0.0%	0	0.0%	1	8.3%	50	1.7%	
Moderate	2	16.7%	412	14.0%	1	8.3%	82	2.8%	
<i>Low/Moderate Total</i>	2	16.7%	412	14.0%	2	16.7%	132	4.5%	
Middle	9	75.0%	2,217	75.2%	0	0.0%	0	0.0%	
Upper	1	8.3%	318	10.8%	9	75.0%	2,717	92.2%	
Unknown	0	0.0%	0	0.0%	1	8.3%	98	3.3%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Total</i>	12	100.0%	2,947	100.0%	12	100.0%	2,947	100.0%	

APPENDIX B: Orlando MSA Assessment Area Lending Tables (Continued)

Loan Distribution Table

For Loan Years From 2004
 Assessment Area: Orlando AA (2000 Census)

Income Categories	By Tract Income				HMDA				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase												
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	10.0%	420	20.3%	2	20.0%	218	10.5%	2	20.0%	218	10.5%
<i>Low/Moderate Total</i>	<i>1</i>	<i>10.0%</i>	<i>420</i>	<i>20.3%</i>	<i>2</i>	<i>20.0%</i>	<i>218</i>	<i>10.5%</i>	<i>2</i>	<i>20.0%</i>	<i>218</i>	<i>10.5%</i>
Middle	7	70.0%	1,257	60.7%	1	10.0%	187	9.0%	1	10.0%	187	9.0%
Upper	2	20.0%	393	19.0%	5	50.0%	785	37.9%	5	50.0%	785	37.9%
Unknown	0	0.0%	0	0.0%	2	20.0%	880	42.5%	2	20.0%	880	42.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	10	100.0%	2,070	100.0%	10	100.0%	2,070	100.0%	10	100.0%	2,070	100.0%
Refinance												
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	4	44.4%	825	45.0%	3	33.3%	428	23.3%	3	33.3%	428	23.3%
Upper	5	55.6%	1,009	55.0%	6	66.7%	1,406	76.7%	6	66.7%	1,406	76.7%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	9	100.0%	1,834	100.0%	9	100.0%	1,834	100.0%	9	100.0%	1,834	100.0%
Home Improvement												
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multi-Family												
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
HMDA Totals												
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	5.3%	420	10.8%	2	10.5%	218	5.6%	2	10.5%	218	5.6%
<i>Low/Moderate Total</i>	<i>1</i>	<i>5.3%</i>	<i>420</i>	<i>10.8%</i>	<i>2</i>	<i>10.5%</i>	<i>218</i>	<i>5.6%</i>	<i>2</i>	<i>10.5%</i>	<i>218</i>	<i>5.6%</i>
Middle	11	57.9%	2,082	53.3%	4	21.1%	615	15.8%	4	21.1%	615	15.8%
Upper	7	36.8%	1,402	35.9%	11	57.9%	2,191	56.1%	11	57.9%	2,191	56.1%
Unknown	0	0.0%	0	0.0%	2	10.5%	880	22.5%	2	10.5%	880	22.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	3,904	100.0%	19	100.0%	3,904	100.0%	19	100.0%	3,904	100.0%

APPENDIX C: AGGREGATE TABLES

Peer Group Loan Distribution Report

Whole Bank - 2002

	By Tract Income				HMDA				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase											
Low	292	0.4%	26,313	0.2%	5,170	6.6%	402,277	3.5%				
Moderate	6,947	8.9%	673,457	5.9%	14,574	18.7%	1,428,880	12.4%				
<i>Low/Moderate Total</i>	7,239	9.3%	699,770	6.1%	19,744	25.3%	1,831,157	15.9%				
Middle	50,433	64.7%	6,468,342	56.2%	16,823	21.6%	2,028,927	17.6%				
Upper	20,318	26.1%	4,339,473	37.7%	28,159	36.1%	5,744,880	49.9%				
Unknown	2	0.0%	198	0.0%	13,266	17.0%	1,902,819	16.5%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
Total	77,992	100.0%	11,507,783	100.0%	77,992	100.0%	11,507,783	100.0%				
Refinance												
Low	266	0.3%	25,687	0.2%	5,687	6.5%	417,028	3.4%				
Moderate	6,505	7.4%	609,460	5.0%	14,199	16.1%	1,306,121	10.6%				
<i>Low/Moderate Total</i>	6,771	7.7%	635,147	5.2%	19,886	22.6%	1,723,149	14.1%				
Middle	51,397	58.3%	6,184,761	50.4%	18,841	21.4%	2,085,140	17.0%				
Upper	29,929	34.0%	5,443,817	44.4%	33,093	37.6%	6,175,732	50.4%				
Unknown	3	0.0%	388	0.0%	16,280	18.5%	2,280,092	18.6%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
Total	88,100	100.0%	12,264,113	100.0%	88,100	100.0%	12,264,113	100.0%				
Home Improvement												
Low	18	0.4%	652	0.4%	441	10.5%	8,429	5.6%				
Moderate	496	11.8%	13,017	8.7%	784	18.7%	20,261	13.5%				
<i>Low/Moderate Total</i>	514	12.2%	13,669	9.1%	1,225	29.2%	28,690	19.2%				
Middle	2,476	59.0%	80,488	53.8%	1,099	26.2%	34,737	23.2%				
Upper	1,206	28.7%	55,531	37.1%	1,691	40.3%	77,355	51.7%				
Unknown	0	0.0%	0	0.0%	181	4.3%	8,906	5.9%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
Total	4,196	100.0%	149,688	100.0%	4,196	100.0%	149,688	100.0%				
Multi-Family												
Low	5	6.0%	24,932	8.0%	0	0.0%	0	0.0%				
Moderate	20	24.1%	36,867	11.9%	0	0.0%	0	0.0%				
<i>Low/Moderate Total</i>	25	30.1%	61,799	19.9%	0	0.0%	0	0.0%				
Middle	41	49.4%	150,176	48.4%	0	0.0%	0	0.0%				
Upper	17	20.5%	98,019	31.6%	0	0.0%	0	0.0%				
Unknown	0	0.0%	0	0.0%	83	100.0%	309,994	100.0%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
Total	83	100.0%	309,994	100.0%	83	100.0%	309,994	100.0%				
HMDA Totals												
Low	581	0.3%	77,584	0.3%	11,298	6.6%	827,734	3.4%				
Moderate	13,968	8.2%	1,332,801	5.5%	29,557	17.3%	2,755,262	11.4%				
<i>Low/Moderate Total</i>	14,549	8.5%	1,410,385	5.8%	40,855	24.0%	3,582,996	14.8%				
Middle	104,347	61.2%	12,883,767	53.2%	36,763	21.6%	4,148,804	17.1%				
Upper	51,470	30.2%	9,936,840	41.0%	62,943	36.9%	11,997,967	49.5%				
Unknown	5	0.0%	586	0.0%	29,810	17.5%	4,501,811	18.6%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
Total	170,371	100.0%	24,231,578	100.0%	170,371	100.0%	24,231,578	100.0%				

APPENDIX C: AGGREGATE TABLES (Continued)

Peer Group Loan Distribution Report

Whole Bank - 2003

	By Tract Income				HMDA				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase												
Low	344	0.4%	31,730	0.2%	4,620	5.0%	391,310	2.7%				
Moderate	14,181	15.2%	1,503,420	10.5%	15,296	16.4%	1,610,088	11.2%				
<i>Low/Moderate Total</i>	14,525	15.6%	1,535,150	10.7%	19,916	21.4%	2,001,398	13.9%				
Middle	46,139	49.5%	6,149,219	42.8%	19,037	20.4%	2,423,474	16.9%				
Upper	32,470	34.9%	6,673,232	46.5%	36,285	39.0%	7,380,291	51.4%				
Unknown	0	0.0%	0	0.0%	17,896	19.2%	2,552,438	17.8%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
Total	93,134	100.0%	14,357,601	100.0%	93,134	100.0%	14,357,601	100.0%				
Refinance												
Low	359	0.3%	37,167	0.2%	6,883	5.1%	528,510	2.8%				
Moderate	16,098	11.8%	1,538,831	8.1%	20,273	14.9%	1,939,952	10.2%				
<i>Low/Moderate Total</i>	16,457	12.1%	1,575,998	8.3%	27,156	20.0%	2,468,462	12.9%				
Middle	63,820	46.9%	7,604,476	39.9%	26,860	19.8%	3,094,845	16.2%				
Upper	55,667	40.9%	9,899,209	51.9%	52,829	38.9%	9,667,929	50.7%				
Unknown	0	0.0%	0	0.0%	29,099	21.4%	3,848,447	20.2%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
Total	135,944	100.0%	19,079,683	100.0%	135,944	100.0%	19,079,683	100.0%				
Home Improvement												
Low	16	0.4%	637	0.4%	319	8.0%	7,951	4.8%				
Moderate	567	14.2%	20,748	12.6%	684	17.1%	20,760	12.6%				
<i>Low/Moderate Total</i>	583	14.6%	21,385	13.0%	1,003	25.1%	28,711	17.4%				
Middle	1,985	49.7%	75,489	45.8%	979	24.5%	34,378	20.9%				
Upper	1,426	35.7%	67,959	41.2%	1,781	44.6%	81,814	49.6%				
Unknown	0	0.0%	0	0.0%	231	5.8%	19,930	12.1%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
Total	3,994	100.0%	164,833	100.0%	3,994	100.0%	164,833	100.0%				
Multi-Family												
Low	2	2.3%	2,170	0.9%	0	0.0%	0	0.0%				
Moderate	39	45.3%	71,365	29.9%	0	0.0%	0	0.0%				
<i>Low/Moderate Total</i>	41	47.7%	73,535	30.9%	0	0.0%	0	0.0%				
Middle	34	39.5%	125,968	52.9%	0	0.0%	0	0.0%				
Upper	11	12.8%	38,780	16.3%	0	0.0%	0	0.0%				
Unknown	0	0.0%	0	0.0%	86	100.0%	238,283	100.0%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
Total	86	100.0%	238,283	100.0%	86	100.0%	238,283	100.0%				
HMDA Totals												
Low	721	0.3%	71,704	0.2%	11,822	5.1%	927,771	2.7%				
Moderate	30,885	13.2%	3,134,364	9.3%	36,253	15.5%	3,570,800	10.6%				
<i>Low/Moderate Total</i>	31,606	13.6%	3,206,068	9.5%	48,075	20.6%	4,498,571	13.3%				
Middle	111,978	48.0%	13,955,152	41.2%	46,876	20.1%	5,552,697	16.4%				
Upper	89,574	38.4%	16,679,180	49.3%	90,895	39.0%	17,130,034	50.6%				
Unknown	0	0.0%	0	0.0%	47,312	20.3%	6,659,098	19.7%				
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%				
Total	233,158	100.0%	33,840,400	100.0%	233,158	100.0%	33,840,400	100.0%				

APPENDIX C: AGGREGATE TABLES (Continued)

Peer Group Loan Distribution Report

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	By Tract Income			HMDA		By Borrower Income		
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	13	0.1%	2,843	0.1%	808	6.6%	82,612	2.9%
Moderate	254	2.1%	43,014	1.5%	2,017	16.4%	243,732	8.6%
<i>Low/Moderate Total</i>	267	2.2%	45,857	1.6%	2,825	22.9%	326,344	11.5%
Middle	7,844	63.6%	1,349,292	47.6%	2,133	17.3%	313,739	11.1%
Upper	4,216	34.2%	1,441,960	50.8%	5,709	46.3%	1,703,076	60.0%
Unknown	0	0.0%	0	0.0%	1,660	13.5%	493,950	17.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	12,327	100.0%	2,837,109	100.0%	12,327	100.0%	2,837,109	100.0%
Refinance								
Low	23	0.2%	5,114	0.2%	1,037	7.3%	94,253	3.2%
Moderate	185	1.3%	24,856	0.9%	2,474	17.4%	283,330	9.7%
<i>Low/Moderate Total</i>	208	1.5%	29,970	1.0%	3,511	24.7%	377,583	13.0%
Middle	8,334	58.5%	1,281,483	44.0%	2,696	18.9%	394,905	13.6%
Upper	5,699	40.0%	1,602,243	55.0%	5,762	40.5%	1,650,924	56.7%
Unknown	0	0.0%	0	0.0%	2,272	16.0%	490,284	16.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	14,241	100.0%	2,913,696	100.0%	14,241	100.0%	2,913,696	100.0%
Home Improvement								
Low	1	0.2%	5	0.0%	94	22.1%	1,091	4.6%
Moderate	7	1.6%	120	0.5%	93	21.9%	2,765	11.6%
<i>Low/Moderate Total</i>	8	1.9%	125	0.5%	187	44.0%	3,856	16.2%
Middle	292	68.7%	11,734	49.2%	90	21.2%	3,973	16.6%
Upper	125	29.4%	12,014	50.3%	122	28.7%	13,268	55.6%
Unknown	0	0.0%	0	0.0%	26	6.1%	2,776	11.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	425	100.0%	23,873	100.0%	425	100.0%	23,873	100.0%
Multi-Family								
Low	1	9.1%	487	1.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	1	9.1%	487	1.0%	0	0.0%	0	0.0%
Middle	7	63.6%	37,972	81.5%	0	0.0%	0	0.0%
Upper	3	27.3%	8,113	17.4%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	11	100.0%	46,572	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	11	100.0%	46,572	100.0%	11	100.0%	46,572	100.0%
HMDA Totals								
Low	38	0.1%	8,449	0.1%	1,939	7.2%	177,956	3.1%
Moderate	446	1.7%	67,990	1.2%	4,584	17.0%	529,827	9.1%
<i>Low/Moderate Total</i>	484	1.8%	76,439	1.3%	6,523	24.2%	707,783	12.2%
Middle	16,477	61.0%	2,680,481	46.0%	4,919	18.2%	712,617	12.2%
Upper	10,043	37.2%	3,064,330	52.6%	11,593	42.9%	3,367,268	57.8%
Unknown	0	0.0%	0	0.0%	3,969	14.7%	1,033,582	17.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	27,004	100.0%	5,821,250	100.0%	27,004	100.0%	5,821,250	100.0%

APPENDIX C: AGGREGATE TABLES (Continued)

Peer Group Loan Distribution Report

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	By Tract Income				HMDA		By Borrower Income		
	#	%	\$(000s)	%	#	%	\$(000s)	%	
Home Purchase									
Low	24	0.2%	6,171	0.2%	477	3.4%	53,843	1.7%	
Moderate	1,328	9.6%	199,866	6.2%	1,757	12.7%	220,131	6.8%	
<i>Low/Moderate Total</i>	1,352	9.7%	206,037	6.4%	2,234	16.1%	273,974	8.5%	
Middle	6,290	45.3%	1,148,421	35.5%	2,322	16.7%	356,761	11.0%	
Upper	6,229	44.9%	1,883,922	58.2%	7,465	53.8%	2,150,453	66.4%	
Unknown	0	0.0%	0	0.0%	1,850	13.3%	457,192	14.1%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	13,871	100.0%	3,238,380	100.0%	13,871	100.0%	3,238,380	100.0%	
Refinance									
Low	44	0.2%	11,913	0.3%	1,068	4.8%	97,129	2.2%	
Moderate	2,167	9.8%	275,538	6.2%	3,298	14.9%	381,913	8.6%	
<i>Low/Moderate Total</i>	2,211	10.0%	287,451	6.5%	4,366	19.8%	479,042	10.8%	
Middle	10,278	46.5%	1,630,866	36.9%	4,078	18.5%	584,493	13.2%	
Upper	9,606	43.5%	2,498,797	56.6%	9,898	44.8%	2,631,754	59.6%	
Unknown	0	0.0%	0	0.0%	3,753	17.0%	721,825	14.1%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	22,095	100.0%	4,417,114	100.0%	22,095	100.0%	4,417,114	100.0%	
Home Improvement									
Low	0	0.0%	0	0.0%	30	9.6%	1,070	4.9%	
Moderate	36	11.5%	1,396	6.4%	49	15.7%	2,134	9.8%	
<i>Low/Moderate Total</i>	36	11.5%	1,396	6.4%	79	25.3%	3,204	14.7%	
Middle	170	54.5%	10,758	49.4%	72	23.1%	2,894	13.3%	
Upper	106	34.0%	9,636	44.2%	132	42.3%	10,817	49.6%	
Unknown	0	0.0%	0	0.0%	29	9.3%	4,875	22.4%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	312	100.0%	21,790	100.0%	312	100.0%	21,790	100.0%	
Multi-Family									
Low	1	11.1%	2,000	4.5%	0	0.0%	0	0.0%	
Moderate	2	22.2%	4,940	11.1%	0	0.0%	0	0.0%	
<i>Low/Moderate Total</i>	3	33.3%	6,940	15.6%	0	0.0%	0	0.0%	
Middle	3	33.3%	10,983	24.6%	0	0.0%	0	0.0%	
Upper	3	33.3%	26,700	59.8%	0	0.0%	0	0.0%	
Unknown	0	0.0%	0	0.0%	9	100.0%	44,623	100.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	9	100.0%	44,623	100.0%	9	100.0%	44,623	100.0%	
HMDA Totals									
Low	69	0.2%	20,084	0.3%	1,575	4.3%	152,042	2.0%	
Moderate	3,533	9.7%	481,740	6.2%	5,104	14.1%	604,178	7.8%	
<i>Low/Moderate Total</i>	3,602	9.9%	501,824	6.5%	6,679	18.4%	756,220	9.8%	
Middle	16,741	46.1%	2,801,028	36.3%	6,472	17.8%	944,148	12.2%	
Upper	15,944	43.9%	4,419,055	57.2%	17,495	48.2%	4,793,024	62.1%	
Unknown	0	0.0%	0	0.0%	5,641	15.5%	1,228,515	15.9%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total	36,287	100.0%	7,721,907	100.0%	36,287	100.0%	7,721,907	100.0%	

APPENDIX C: AGGREGATE TABLES (Continued)

Peer Group Loan Distribution Report

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	HMDA							
	By Tract Income			By Borrower Income				
	#	%	\$(000s)	#	%	\$(000s)	%	
	Home Purchase							
Low	279	0.4%	23,470	0.3%	4,362	6.6%	319,665	3.7%
Moderate	6,693	10.2%	630,443	7.3%	12,557	19.1%	1,185,148	13.7%
<i>Low/Moderate Total</i>	6,972	10.6%	653,913	7.5%	16,919	25.8%	1,504,813	17.4%
Middle	42,589	64.9%	5,119,050	59.0%	14,690	22.4%	1,715,188	19.8%
Upper	16,102	24.5%	2,897,513	33.4%	22,450	34.2%	4,041,804	46.6%
Unknown	2	0.0%	198	0.0%	11,606	17.7%	1,408,869	16.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	65,665	100.0%	8,670,674	100.0%	65,665	100.0%	8,670,674	100.0%
	Refinance							
Low	243	0.3%	20,573	0.2%	4,650	6.3%	322,775	3.5%
Moderate	6,320	8.6%	584,604	6.3%	11,725	15.9%	1,022,791	10.9%
<i>Low/Moderate Total</i>	6,563	8.9%	605,177	6.5%	16,375	22.2%	1,345,566	14.4%
Middle	43,063	58.3%	4,903,278	52.4%	16,145	21.9%	1,690,235	18.1%
Upper	24,230	32.8%	3,841,574	41.1%	27,331	37.0%	4,524,808	48.4%
Unknown	3	0.0%	388	0.0%	14,008	19.0%	1,789,808	19.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	73,859	100.0%	9,350,417	100.0%	73,859	100.0%	9,350,417	100.0%
	Home Improvement							
Low	17	0.5%	647	0.5%	347	9.2%	7,338	5.8%
Moderate	489	13.0%	12,897	10.3%	691	18.3%	17,496	13.9%
<i>Low/Moderate Total</i>	506	13.4%	13,544	10.8%	1,038	27.5%	24,834	19.7%
Middle	2,184	57.9%	68,754	54.6%	1,009	26.8%	30,764	24.5%
Upper	1,081	28.7%	43,517	34.6%	1,569	41.6%	64,087	50.9%
Unknown	0	0.0%	0	0.0%	155	4.1%	6,130	4.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	3,771	100.0%	125,815	100.0%	3,771	100.0%	125,815	100.0%
	Multi-Family							
Low	4	5.6%	24,445	9.3%	0	0.0%	0	0.0%
Moderate	20	27.8%	36,867	14.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	24	33.3%	61,312	23.3%	0	0.0%	0	0.0%
Middle	34	47.2%	112,204	42.6%	0	0.0%	0	0.0%
Upper	14	19.4%	89,906	34.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	72	100.0%	263,422	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	72	100.0%	263,422	100.0%	72	100.0%	263,422	100.0%
	HMDA Totals							
Low	543	0.4%	69,135	0.4%	9,359	6.5%	649,778	3.5%
Moderate	13,522	9.4%	1,264,811	6.9%	24,973	17.4%	2,225,435	12.1%
<i>Low/Moderate Total</i>	14,065	9.8%	1,333,946	7.2%	34,332	23.9%	2,875,213	15.6%
Middle	87,870	61.3%	10,203,286	55.4%	31,844	22.2%	3,436,187	18.7%
Upper	41,427	28.9%	6,872,510	37.3%	51,350	35.8%	8,630,699	46.9%
Unknown	5	0.0%	586	0.0%	25,841	18.0%	3,468,229	18.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	143,367	100.0%	18,410,328	100.0%	143,367	100.0%	18,410,328	100.0%

APPENDIX C: AGGREGATE TABLES (Continued)

Peer Group Loan Distribution Report

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	By Tract Income				HMDA		By Borrower Income		
	#	%	\$(000s)	%	#	%	\$(000s)	%	
	Home Purchase								
Low	320	0.4%	25,559	0.2%	4,143	5.2%	337,467	3.0%	
Moderate	12,853	16.2%	1,303,554	11.7%	13,539	17.1%	1,389,957	12.5%	
<i>Low/Moderate Total</i>	13,173	16.6%	1,329,113	12.0%	17,682	22.3%	1,727,424	15.5%	
Middle	39,849	50.3%	5,000,798	45.0%	16,715	21.1%	2,066,713	18.6%	
Upper	26,241	33.1%	4,789,310	43.1%	28,820	36.4%	5,229,838	47.0%	
Unknown	0	0.0%	0	0.0%	16,046	20.2%	2,095,246	18.8%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Total</i>	79,263	100.0%	11,119,221	100.0%	79,263	100.0%	11,119,221	100.0%	
Refinance									
Low	315	0.3%	25,254	0.2%	5,815	5.1%	431,381	2.9%	
Moderate	13,931	12.2%	1,263,293	8.6%	16,975	14.9%	1,558,039	10.6%	
<i>Low/Moderate Total</i>	14,246	12.5%	1,288,547	8.8%	22,790	20.0%	1,989,420	13.6%	
Middle	53,542	47.0%	5,973,610	40.7%	22,782	20.0%	2,510,352	17.1%	
Upper	46,061	40.5%	7,400,412	50.5%	42,931	37.7%	7,036,175	48.0%	
Unknown	0	0.0%	0	0.0%	25,346	22.3%	3,126,622	21.3%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Total</i>	113,849	100.0%	14,662,569	100.0%	113,849	100.0%	14,662,569	100.0%	
Home Improvement									
Low	16	0.4%	637	0.4%	289	7.8%	6,881	4.8%	
Moderate	531	14.4%	19,352	13.5%	635	17.2%	18,626	13.0%	
<i>Low/Moderate Total</i>	547	14.9%	19,989	14.0%	924	25.1%	25,507	17.8%	
Middle	1,815	49.3%	64,731	45.3%	907	24.6%	31,484	22.0%	
Upper	1,320	35.9%	58,323	40.8%	1,649	44.8%	70,997	49.6%	
Unknown	0	0.0%	0	0.0%	202	5.5%	15,055	10.5%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Total</i>	3,682	100.0%	143,043	100.0%	3,682	100.0%	143,043	100.0%	
Multi-Family									
Low	1	1.3%	170	0.1%	0	0.0%	0	0.0%	
Moderate	37	48.1%	66,425	34.3%	0	0.0%	0	0.0%	
<i>Low/Moderate Total</i>	38	49.4%	66,595	34.4%	0	0.0%	0	0.0%	
Middle	31	40.3%	114,985	59.4%	0	0.0%	0	0.0%	
Upper	8	10.4%	12,080	6.2%	0	0.0%	0	0.0%	
Unknown	0	0.0%	0	0.0%	77	100.0%	193,660	100.0%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Total</i>	77	100.0%	193,660	100.0%	77	100.0%	193,660	100.0%	
HMDA Totals									
Low	652	0.3%	51,620	0.2%	10,247	5.2%	775,729	3.0%	
Moderate	27,352	13.9%	2,652,624	10.2%	31,149	15.8%	2,966,622	11.4%	
<i>Low/Moderate Total</i>	28,004	14.2%	2,704,244	10.4%	41,396	21.0%	3,742,351	14.3%	
Middle	95,237	48.4%	11,154,124	42.7%	40,404	20.5%	4,608,549	17.6%	
Upper	73,630	37.4%	12,260,125	46.9%	73,400	37.3%	12,337,010	47.2%	
Unknown	0	0.0%	0	0.0%	41,671	21.2%	5,430,583	20.8%	
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
<i>Total</i>	196,871	100.0%	26,118,493	100.0%	196,871	100.0%	26,118,493	100.0%	