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Comptroller of the Currency  
Administrator of National Banks

LARGE BANK

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## Public Disclosure

June 21, 1999

### Community Reinvestment Act Performance Evaluation

City National Bank of Florida  
Charter Number: 15977

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**NOTE:** This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## GENERAL INFORMATION

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

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **City National Bank of Florida (City NB), Miami, Florida** prepared by the **Office of the Comptroller of the Currency**, the institution's supervisory agency, as of June 21, 1999. The agency evaluates performance in assessment areas, as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

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

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

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

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

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

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

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

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

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

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

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

**Metropolitan Statistical Area (MSA)** - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

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

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

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

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

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

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

### Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated “Satisfactory.”

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

Performance Levels	City National Bank of Florida Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	x		
Low Satisfactory		x	x
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating are:

#### Lending Test

C high lending level reflects a good responsiveness to community credit needs. As of year-end 1998, ninety-three percent of the number of loans and 82% of the volume of loans were made in the assessment area. Geographic distribution of loans in the assessment area is good. Small business lending by geography is excellent. Lending to borrowers of different incomes and businesses of different sizes is good. CD lending is good.

#### Investment Test

C an adequate level and volume of qualified investments.

## Service Test

- C delivery systems are reasonably accessible to geographies of different income levels and community development services are adequate.

## Description of Institution

City National Bank of Florida (**City NB**), chartered in 1970, is the result of a consolidation of affiliated banks having a history of operations in Dade County dating back to 1946. City NB is wholly-owned by City National Bancshares, Inc., a bank holding company which is headquartered in Miami, Florida. The holding company, in turn, is 99% owned by Leonard Abess, Jr. and family. The bank has one affiliate, City National Corporation, which is 100% owned by the holding company. The affiliate is not active. City NB is an intrastate financial institution.

The bank's main office is located in downtown Miami, Florida with other office locations established throughout Dade and Broward counties. Twelve of the branch locations are in Dade, the larger of the two counties, with two branches located in Broward. Most of the branches in Dade county are concentrated in the eastern portions of the county. The two branch locations in Broward County are just now beginning to make its presence felt in the community. One office has traditionally functioned as an extension of the Dade County operation. While the other branch started as a loan production office, it has since become a full service facility in 1997. Since the last CRA evaluation dated April 21, 1997, the bank has opened two branches with no branch closings taking place..

City NB continues to offer a full range of traditional loan products and deposit services.

As of June 30, 1999, City NB had total assets of \$1.5 billion as compared to \$1 billion at year-end 1996. The major categories of the bank's \$1 billion loan portfolio were as follows: 4% to individuals; 22% for commercial real estate; 58% for commercial and industrial; 12% for 1-4 family residential; and 4% other loans. The percent of the bank's total assets represented by net loans was 71% as compared to 66% for thirteen (13) similar size peer banks in the southeastern United States having assets between \$1 and \$2 billion. This ranking placed the bank in the 69th percentile of its peer group. Tier One Capital was 7.90% at mid-year 1999, as compared to 8.24% for peer banks.

There are no legal, financial, or other impediments which would hamper the bank's ability to help meet the credit needs of its community. The bank's rating at its preceding CRA examination, dated April 21, 1997 was "*Satisfactory Record of Meeting Community Credit Needs.*"

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This examination covers the bank's performance from January 1, 1997 to December 31, 1998. For the lending test, we reviewed small business loans, HMDA reportable loans, and community development loans. The bank did not have any small farm loans. Management did not request an analysis of consumer loans because they were not material in number or dollar amount. For the Investment and Service Tests, an evaluation was made of any investments, products and services provided from April 21, 1997 through June 21, 1999.

### Data Integrity

The accuracy of 1997 and 1998 data reported for HMDA and small business loans was verified. HMDA and small business loans were found to be accurately reported. Also, all publicly reported data and any information provided by the bank regarding qualified investments and services were reviewed to attest to their accuracy. No significant inaccuracies were noted.

### Selection of Areas for Full-Scope Review

The Miami MSA received a full-scope review while the Fort Lauderdale MSA received a limited-scope review. However, the ratings are based primarily on the results of the Miami MSA which is the most significant market in which the bank operates. The Miami MSA provides 87% of the bank's deposits and it is where 78% of the bank's loans is made. City NB is a recent entrant into the Fort Lauderdale MSA and its presence is limited to two branches in the assessment area. Refer to the table in Appendix A for more detailed information.

### Ratings

Small business, home mortgage, and community development loans were the primary areas of focus in assessing the bank's lending performance. City NB is a wholesale lender because the bank primarily markets and lends money for non-consumer loan purposes. Consumer loan means a loan to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan.

Because small business and home mortgage lending were determined to be a primary credit need of the community, they were weighted equally in the overall lending test. Home mortgage and home refinance loans were given equal weight. Home improvement loans were immaterial because of the small volume and the number of loans granted. The bank did not grant any small farm loans during this evaluation period.

**Other**

Community credit needs of the assessment area were determined by reviewing recent community contacts conducted by federal bank regulators in connection with previous CRA examinations. Also, a review was made of the U.S. Department of Housing and Urban Development (HUD) Consolidated Strategies and Plans 1995 (Executive Summary) for Dade and Broward Counties. These HUD Consolidated Strategies and Plans are comprehensive reports that identify community credit needs and community development opportunities. No formal community contacts were made during this examination because of the availability of recent community contact information and the comprehensive studies performed by HUD regarding the Consolidated Strategies and Plans for the Miami MSA.

The most critical needs for both counties have been single and multi-unit housing rehabilitation, new construction of owner and rental housing, public services infrastructure improvements and economic development. In particular, the need is for affordable housing, creation of jobs, public services for youth and senior citizens, and the installation of water and sewer lines.

### **Fair Lending Review**

Compliance with fair lending laws and regulations is satisfactory. There was no evidence of discriminatory or other illegal credit practices noted. The bank was found in compliance with the substantive provisions of anti-discrimination laws and regulations. Due to the lack of a sufficient number of prohibited basis denials to select a sample of home mortgage, home improvement or home refinanced loans, our comparative fair lending analysis used approved loan applications to compare rates, terms and conditions.

Marital status was chosen as the basis for selecting our prohibited basis group and for performing our comparative analysis. We reviewed approvals of unmarried versus married applicants. A sample of approvals was reviewed to assess the bank's consistency in applying underwriting guidelines. Our sample included a review of purchase money mortgages for the bank's own portfolio.

## Conclusions with Respect to Performance Tests

### LENDING TEST

#### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated **high satisfactory**. Based on the full-scope review, the bank's performance in the Miami, Florida MSA is good.

#### Lending Activity

The bank has a high level of lending activity which reflects a good responsiveness to the community credit needs. During this rating period, a substantial majority of the bank's loans was made in its assessment area. An internal analysis of the loan portfolio as of year-end 1998 revealed that 93% of the number of loans and 82% of the volume of loans were extended within the assessment area. Approximately \$195 million were extended in home mortgage, small business, and community development loans. As of June 30, 1999, the net loans to deposits ratio was 93% as compared with its peer group of banks at 84%. A similar trend is also highlighted by the bank's net loans to assets ratio of 74% as compared to its peer group of banks at 64%.

Overall, the bank's market share in relation to its lending performance is commensurate with its market deposit share in the Miami MSA. The bank's market share in deposits is 2% while its market share in home purchase loans and home mortgage refinance loans is less than 1%, respectively. However, the bank's market share for small business loans approximates 1%.

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

#### Distribution of Loans by Income Level of the Geography

##### Home Mortgage Loans

Overall, the distribution of home mortgage loans by income level of the geography is good. As depicted in Tables 2, 3, and 4 of the Appendix, the bank's lending level for home purchase loans in low income census tracts exceeds the demographics for low income geographies. In moderate income geographies, the level of performance regarding home purchase loan originations is less than the community's demographics.

The bank's lending level for home mortgage refinance loans in moderate income geographies exceeds the demographic. The bank made no loans in low income geographies which contain low owner-occupied unit levels and a high level of persons living below the poverty level.

There were no unexplained lending gaps in the analysis of the bank's geographic distribution of loans by income level.

### **Small Business Loans**

Overall, small business lending by geographies is excellent. As highlighted in Table 5 of Appendix C, the percentage of the bank's small business loans in low and moderate income geographies exceeds the percentage of businesses residing in those geographies. The bank's market share performance in low income geographies also exceeds its overall market share. The bank's performance in moderate income geographies equals its overall market share.

### **Distribution of Loans by Income Level of the Borrower**

#### **Home Mortgage Loans**

Overall, the distribution of home mortgage loans by borrower's income is good. Home purchase lending by borrower income is good. The level of lending to low income borrowers is lower than the comparable demographic. Lending to moderate income borrowers exceeds the demographic.

Home mortgage refinance lending by borrower income is good. The level of lending to low income borrowers is lower than the demographic. Lending to moderate income borrowers exceeds the demographic.

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

#### **Small Business Loans**

Refer to Tables 10 in Appendix C for the facts and data used to evaluate the borrower distribution of small business loan originations. The bank's performance in granting loans to businesses with revenues of \$1 million or less is good. The bank's percent of loans to small businesses exceeds the market's percent of loans to small businesses. The bank's percentage of loans to small businesses is lower than the percentage of small businesses. The bank's percentage of loans of \$100,000 or less is lower than the percentage of small businesses.

### **Community Development Lending**

The bank's performance regarding community development lending is good. With respect to the bank's size and resources, a relatively high level of CD loans has been made. City NB remains an active lender in granting CD loans. During this evaluation period, the bank extended eighteen (18) CD loans aggregating approximately \$18 million. The bank's lending had a significant impact on the availability of low and moderate income housing, particularly, on much needed low income rental housing units. For example, one loan was used to refinance a 170 unit rental apartment community in which 30% of the units were designated for low income families and 50% were for moderate income families with a second mortgage to be held by the Metro Dade Housing Development Grant Authority. Another similar loan was granted in which a 13 story 143 unit Section 8 rental project was being funded.

While none of the CD loans were considered innovative or complex, the bank's funding of these types of instruments continued to be very responsive to one of the community's most pressing needs which is affordable housing.

In the Miami MSA, there are numerous opportunities and various financial vehicles available for funding CD loans. However, competition for these loans are keen among area financial institutions.

### **Product Innovation and Flexibility**

City NB does not offer any innovative or nontraditional product or flexible lending programs for HMDA, small business or small farm lending.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Fort Lauderdale MSA is not inconsistent with the bank's overall excellent performance under the Lending Test. Refer to the Tables 1 through 11 in Appendix C for the facts and data that support these conclusions.

### **INVESTMENT TEST**

The bank's performance under the Investment Test is rated low satisfactory. City NB has made an adequate level of qualified investments given its size, financial resources, business strategy and available resources. The largest dollar amount of qualified investments is a Fannie Mae Mortgage-Backed

(FNMA) security aggregating \$992 thousand. The collateral is multi-family apartment housing for low and moderate income families. In the Miami MSA, there are numerous opportunities for qualified investments based on a review of data, information contained in the OCC's database and community contacts. However, competition is strong because large institutions also need these investments and are able to purchase entire blocks of investments which impact this bank's ability to purchase investment.

Prior period investments approximating 2.5 million are primarily CRA investments used to fund affordable housing projects and programs in the community. All of these projects continue to have a positive impact on the community as they provide affordable housing units for LMI individuals.

The bank also has made approximately \$27,000 in donations to various organizations with the proceeds primarily targeted to low and moderate income individuals. A recap of some of these donations is detailed as follows:

- C \$2,750 was a donation to Goodwill Industries of South Florida which provides shelter for the homeless and job skills for LMI individuals;
- C \$2,000 was a donation to HOPE (Housing Opportunities Project for Excellence) which sponsors educational programs relating to housing for LMI individuals;
- C \$6,000 was a donation to Little Haiti Housing Association CDC. The primary purpose of this organization is to provide affordable housing opportunities for LMI individuals;
- C \$3,000 was donated to Opa Locka CDC which provides affordable housing opportunities for LMI individuals;
- C \$100 was a donation to North Beach Development Corporation CDC. The primary purpose of the organization is to provide affordable housing opportunities for LMI individuals; and,
- C \$3,000 was donated to the Miami Dade Neighborhood Housing Services which sponsors home ownership expositions for LMI individuals.

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

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Fort Lauderdale MSA is stronger than the bank's overall low satisfactory performance. This conclusion is

based on the bank's \$1.9 million granted in qualified investments and donations in the MSA which exceeded the bank's performance in the larger Miami MSA market. The bank's performance in the area receiving a limited scope review did not change the overall Investment Test Rating.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

The bank's performance under the Service Test is rated low satisfactory. Based on full-scope reviews, retail banking services in low and moderate income geographies and to low and moderate income individuals in the Miami MSA are adequate.

Refer to Table 13 in Appendix C for the facts and data used to evaluate the bank's branch and delivery systems.

### **Retail Banking Services**

The bank's service delivery systems are reasonably accessible to all geographies of different income levels in its assessment area. The bank's percentage of branches and ATMs exceed the percentage of the population located in low income geographies. There are no branches or ATMs located in moderate income geographies. Four branches located in middle or upper income geographies are located in close proximity to low or moderate income geographies. All branches offer the same products and services in both English and Spanish languages. Branch hours do not differ significantly and do not affect low and moderate income geographies adversely. The bank has opened one branch since the last CRA evaluation and is located in an upper income geography. No branches have been closed.

### **Community Development Services**

City NB provides an adequate level of community development services. The bank is very active with many of its directors, senior officers and employees serving on community development organization boards and by providing technical assistance to them. These community development organizations work by assisting low and moderate income individuals and small businesses meet their housing and business financial needs. The bank's directors and employees as representatives of the bank serves on approximately 11 organizational boards that promote community development services. Some of the community development services are as follows:

- C Miami Dade Affordable Housing Foundation - Two directors are on the board and lending committee of this affordable housing foundation. This organization provides technical assistance on financial matters to non-profit organizations serving LMI housing.
- C Metro-Miami Action Plan Trust - Bank officer serves as board member. This organization provides technical assistance on financial matters to non-profit organization serving economic development needs in LMI communities.
- C Miami Neighborhood Housing Services - Bank officer serves on the board and Lending committee. This organization is an affordable housing program and provides technical assistance to non-profit organizations serving LMI housing needs.
- C Working Capital Partners for Self Employment (Dade and Broward Counties) - Bank officer serves on the lending committee. This organization provides small business training and offers a micro lending program. It also provides technical assistance to non-profit organizations serving economic development needs.
- C Opa Locka CDC - Bank officer serves on the board and lending committee. This organization is an affordable housing program. This CDC provides technical assistance on financial matters to non-profit organizations serving LMI housing in the Opa Locka community.
- C North Miami Mayor's Economic Task Force - This task force focuses on the revitalization of LMI areas of North Miami. This task force also provides technical assistance on financial matters to non-profit organizations serving economic development needs.
- C RESULTS - This is a micro lending organization focused on community development organizations and programs for LMI individuals. Its primary purpose is to provide financial services and technical assistance which inform community members about how to get or use credit.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Fort Lauderdale MSA is not inconsistent with the bank's overall low satisfactory performance under the Service Test. Refer to the Table 13 in Appendix C for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test: (January 1, 1997 to December 31, 1998) Investment Test: (April 21, 1997 to June 21, 1999) Service Test: (April 21, 1997 to June 21, 1999)	
<b>Financial Institution</b>		<b>Products Reviewed</b>
City National Bank of Florida Miami, Florida		Small Business Loans HMDA Loans Community Development Loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not Applicable		
List of Assessment Areas and Type of Examination		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Dade MSA #5000 Broward MSA #2680	Full-Scope Limited-Scope	

## Appendix B: Market Profiles for Full-Scope Areas

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#### Market Profiles for Areas Receiving Full-Scope Reviews

#### Miami MSA

Demographic Information for Full-Scope Area: Miami MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	267	14%	21%	36%	28%	1%
Population by Geography	1,937,094	9%	19%	40%	32%	nil%
Owner-Occupied Housing by Geography	376,006	3%	13%	41%	43%	0%
Businesses by Geography	89,530	11%	20%	30%	39%	0%
Farms by Geography	1,285	4%	14%	35%	47%	0%
Family Distribution by Income Level	485,213	23%	17%	19%	41%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	485,213	8%	19%	39%	34%	0%
Median Family Income	= \$33,980	Median Housing Value		= \$100,570		
HUD Adjusted Median Family Income for 1998	= \$39,200					
Households Below the Poverty Level	= 17.6%					

Source: 1990 U.S. Census and 1998 HUD updated MFI.

### Description of Assessment Areas

#### Miami, Dade County, Florida (MSA 5000)

The bank has designated all of the Miami, Florida MSA (Dade County) as its assessment area. Dade County's economy is diverse. Major industries include real estate development, trade business with Latin America, tourism, and banking. The Dade County airports and seaports are among the fastest growing in the United States. There are many service businesses in the area. In the extreme southern section of Dade County, agriculture is a major industry (e.g. tomatoes, citrus, and other vegetables).

The area has a large retiree population and a growing number of immigrants from Latin America and the Caribbean. Many residents of the area have moved here from northern cities of the United States and Canada, and others maintain second homes in the area. The coastal communities of the area are characterized by luxury residences and wealthy individuals.

The Miami MSA is Florida's largest metropolitan area and most populous with approximately 2 million people in a nearly 2,000 square mile area. Density in urban areas is increased by the fact that a significant portion of the county is uninhabitable wetlands. It is also the fourth poorest of large metropolitan areas in the United States. According to a Metro-Dade study, 40% of the Greater Miami community either: lives in poverty; is under employed; is less educated than the national average; or is classified medically indigent.

Housing costs in Dade County remain high. According to 1990 census data, the medium housing value was \$100,570. This high cost of housing has placed the unsubsidized purchase of an average single family residence beyond the financial means of many individuals classified as low and moderate income.

Competition within the bank's assessment area is intense. FDIC data as of June 1998 showed 543 financial institutions in Dade County (432 commercial banks and 111 savings banks). In terms of deposits, City NB had \$800 million or 2.21% of the reported deposits in Dade County as of June 1998.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

The tables cover the entire CRA evaluation period. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: purchased loans are treated as originations; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of HMDA Home Improvement Loan Originations** - See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations** - See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (<\$1 million) to businesses originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (<\$500,000) to farms originated by the bank in low-, moderate-, middle- and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table

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

- Table 7. Borrower Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations** - See Table 7.
- Table 9. Borrower Distribution of HMDA Refinance Loan Originations** - See Table 7.
- Table 10. Borrower Distribution of Small Business Loan Originations** - Compares the percentage distribution of the number of small loans (<\$1 million) originated by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Farm Loan Originations** - Compares the percentage distribution of the number of small loans (<\$500 thousand) originated by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. The table also presents the percentage distribution of the number of loans originated by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.
- Table 13. Distribution of Branch and ATM Delivery System** - Compares the percentage distribution of the number of the bank's retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

**Table 14. Geographic and Borrower Distribution of Consumer Loan Originations** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle- and upper-income geographies to the percentage distribution of the population within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage of households by income level in each MSA/assessment area.

**Table 1. Lending Volume**

LENDING VOLUME		State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998								
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Scope:												
Miami (Dade County)	87%	202	\$75,757	473	\$76,250	0	\$0	18	\$18,048	693	\$170,055	78%
Limited-Scope:												
Ft. Lauderdale (Broward County)	13%	68	\$29,334	101	\$19,897	0	\$0	3	\$7,315	172	\$56,546	22%

**Table 2. Geographic Distribution of Home Purchase Loan Originations**

Geographic Distribution: HOME PURCHASE																	State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998													
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans																	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total																
Full-Scope:																																
Miami (Dade County)	3%	6%	13%	11%	41%	50%	43%	33%	110	< 1	< 1	< 1	< 1	< 1	135	79%																
Limited-Scope:																																
Ft. Lauderdale (Broward County)	1%	0%	14%	11%	59%	50%	26%	39%	173	< 1	0	< 1	< 1	< 1	36	21%																

(\*) Based on 1997 Aggregate HMDA Data only.

**Table 3. Geographic Distribution of Home Improvement Loan Originations**

Geographic Distribution: HOME IMPROVEMENT																State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans				
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total			
Full-Scope:																			
Miami (Dade County)	3%	0%	13%	0%	41%	25%	43%	75%	75	< 1	0	0	< 1	< 1	4	80%			
Limited-Scope:																			
Ft. Lauderdale (Broward County)	1%	0%	14%	0%	59%	100%	26%	0%	99	< 1	0	0	< 1	0	1	20%			

(\*) Based on 1997 Aggregate HMDA Data only.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations**

Geographic Distribution: HOME MORTGAGE REFINANCE																
State: Florida																
Evaluation Period: January 1, 1997 TO December 31, 1998																
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans	
	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans	% Owner Occ Units	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Miami (Dade County)	3%	0%	13%	21%	41%	12%	43%	67%	133	< 1	0	< 1	< 1	< 1	49	63%
Limited-Scope:																
Ft. Lauderdale (Broward County)	1%	0%	14%	3%	59%	52%	26%	45%	164	< 1	0	< 1	< 1	< 1	29	37%

(\*) Based on 1997 Aggregate HMDA Data only.

**Table 5. Geographic Distribution of Small Business Loan Originations**

Geographic Distribution: SMALL BUSINESS																	State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans					
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total				
Full-Scope:																				
Miami (Dade County)	11%	22%	20%	21%	31%	24%	38%	33%	18	1	2	1	1	1	473	82%				
Limited-Scope:																				
Ft. Lauderdale (Broward County)	6%	8%	18%	22%	51%	39%	25%	32%	44	< 1	< 1	< 1	0	0	101	18%				

(\*) Based on 1997 Aggregate Small Business Data only.

**Table 6. Geographic Distribution of Small Farm Loan Originations**

Geographic Distribution: SMALL FARM		State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998													
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans		
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total	
Full-Scope:																	
Miami (Dade County)	4%	0%	14%	0%	35%	0%	47%	0%	0	0	0	0	0	0	0	0%	
Limited-Scope:																	
Ft. Lauderdale (Broward County)	4%	0%	17%	0%	53%	0%	26%	0%	0	0	0	0	0	0	0	0%	

(\*) Based on 1997 Aggregate Small Farm Data only.

**Table 7. Borrower Distribution of Home Purchase Loan Originations**

Borrower Distribution: HMDA HOME PURCHASE		State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998													
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans		
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total	
Full-Scope:																	
Miami (Dade County)	23%	5%	17%	28%	19%	25%	41%	42%	110	< 1	< 1	< 1	< 1	< 1	131	79%	
Limited-Scope:																	
Ft. Lauderdale (Broward County)	20%	21%	18%	17%	22%	9%	40%	53%	173	< 1	< 1	< 1	0	< 1	34	21%	

(\*) As a percentage of loans with borrower income information available. No information was available for 3.5% of loans originated by BANK.

(\*\*) Based on 1997 Aggregate HMDA Data only.

**Table 8. Borrower Distribution of Home Improvement Loan Originations**

Borrower Distribution: HOME IMPROVEMENT		State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998												
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Miami (Dade County)	23%	33%	17%	0%	19%	67%	41%	0%	75	< 1	< 1	0	0	< 1	3	75%
Limited-Scope:																
Ft. Lauderdale (Broward County)	20%	0%	18%	0%	22%	0%	40%	100%	99	< 1	0	0	0	< 1	1	25%

(\*) As a percentage of loans with borrower income information available. No information was available for 20% of loans originated by BANK.

(\*\*) Based on 1997 Aggregate HMDA Data only.

**Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations**

Borrower Distribution: HOME MORTGAGE REFINANCE																
State: Florida																
Evaluation Period: January 1, 1997 TO December 31, 1998																
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans	
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total
Full-Scope:																
Miami (Dade County)	23%	9%	17%	22%	19%	13%	41%	56%	133	< 1	< 1	< 1	< 1	< 1	46	65%
Limited-Scope:																
Ft. Lauderdale (Broward County)	20%	12%	18%	20%	22%	4%	40%	64%	164	< 1	0	< 1	< 1	< 1	25	35%

(\*) As a percentage of loans with borrower income information available. No information was available for 9.0% of loans originated by BANK.

(\*\*) Based on 1997 Aggregate HMDA Data only.

**Table 10. Borrower Distribution of Small Business Loan Originations**

Borrower Distribution: SMALL BUSINESS			State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998						
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans		
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Miami (Dade County)	87%	58%	45%	62%	21%	17%	1	1	473	82%	\$161
Limited-Scope:											
Ft. Lauderdale (Broward County)	90%	56%	49%	61%	14%	25%	< 1	< 1	101	18%	\$197

(\*) As a percentage of businesses with known revenues.

(\*\*) As a percentage of loans with revenue information available. No information was available for 0.0% of loans originated by BANK.

(\*\*\*) The market consists of all other Small Business reporters in BANK's assessment area and is based on 1997 Aggregate Small Business Data only.

(\*\*\*\*) Based on 1997 Aggregate Small Business Data only.

**Table 11. Borrower Distribution of Small Farm Loan Originations**

Borrower Distribution: SMALL FARM			State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998						
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans		
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size
Full-Scope:											
Miami (Dade County)	0%	0%	0%	0%	0%	0%	0.00	0.00	0	0%	\$0
Limited-Scope:											
Ft. Lauderdale (Broward County)	0%	0%	0%	0%	0%	0%	0.00	0.00	0	0%	\$0

(\*) As a percentage of farms with known revenues.

(\*\*) As a percentage of loans with revenue information available. No information was available for 0.0% of loans originated by BANK.

(\*\*\*) The market consists of all other Small Farm reporters in BANK's assessment area and is based on 1997 Aggregate Small Farm Data only.

(\*\*\*\*) Based on 1997 Aggregate Small Farm Data only.

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS									
			State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998				
MSA/Assessment Areas:	Prior Period Investments*			Current Period Investments			Total Investments		
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$'s
Full-Scope:									
Miami (Dade County)	5	2,474	70%	12	1,069	30%	17	\$3,543	65%
Limited-Scope:									
Ft. Lauderdale (Broward County)	0	0	0%	5	1,887	100%	5	\$1,887	35%

(\*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.

(\*\*) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

**Table 13. Distribution of Branch and ATM Delivery System**

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM				State: Florida				Evaluation Period: January 1, 1997 TO December 31, 1998									
MSA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Scope:																	
Miami (Dade County)	87%	12	86%	33%	0%	25%	42%	13	87%	31%	0%	23%	46%	9%	19%	40%	32%
Limited-Scope:																	
Ft. Lauderdale (Broward County)	13%	2	14%	50%	0%	50%	0%	2	13%	50%	0%	50%	0%	3%	19%	55%	23%