



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

May 29, 2012

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

City National Bank of Florida
Charter Number: 15977

25 West Flagler Street
Miami, FL 33130-0000

Office of the Comptroller of the Currency

MIAMI (8531) Field Office
Doral Costa Office Park 9800 NW 41st Street, Suite 120
Miami, FL. 33178-2970

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

.

Table of Contents

OVERALL CRA RATING	2
DEFINITIONS AND COMMON ABBREVIATIONS	3
DESCRIPTION OF INSTITUTION.....	7
SCOPE OF THE EVALUATION.....	7
RATING	9
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	10
LENDING TEST	11
INVESTMENT TEST	24
SERVICE TEST.....	25
APPENDIX A: SCOPE OF EXAMINATION	A-1
APPENDIX B: MARKET PROFILES FOR FULL-SCOPE AREAS	B-1
APPENDIX C: TABLES OF PERFORMANCE DATA	C-1

Overall CRA Rating

Institution’s CRA Rating: This institution is rated Outstanding.

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

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

The major factors that support this rating include:

- Lending activity that reflects good responsiveness to the credit needs of the bank’s assessment areas, given performance context.
- Excellent geographic distribution of loans with a substantial majority of loans being within the bank’s assessment area.
- Adequate distribution of loans among borrowers of different income levels and businesses of different sizes.
- An excellent level of community development loans that is strong enough to positively impact the overall Lending Test rating.
- An excellent level of qualified investments responsive to assessment area needs.
- Service delivery systems that are readily accessible to geographies and individuals of different income levels and a good level of community development services.

Definitions and Common Abbreviations

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

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

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

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

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low- or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

Geography: A census tract 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 applications, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

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

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

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

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

Metropolitan Area (MA): Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Description of Institution

City National Bank of Florida (CNBF) is an intrastate commercial bank headquartered in Miami, Florida. The bank is wholly owned by CM Florida Holdings, Inc. headquartered in Coral Gables, Florida. CM Florida Holdings is wholly owned by Caja Madrid Cibeles S.A., which in turn is wholly owned by Bankia, S.A., one of Spain's largest financial institutions. CNBF has no operating subsidiaries.

As of December 31, 2011, CNBF had total assets of \$4.0 billion. Deposits totaled \$2.9 billion and the total loan portfolio (net of unearned income), which represents 50 percent of total assets, was \$2.0 billion. The loan to deposit ratio was 69 percent. Components of the bank's loan portfolio include commercial real estate loans (40 percent), residential real estate loans (34 percent), commercial and industrial loans (13 percent), construction loans (11 percent), and other loans, including consumer loans, (3 percent). Also as of December 31, 2011, Tier 1 capital totaled \$380 million.

The bank's strategic focus is commercial real estate lending, corporate cash management, and private banking. In order to meet its CRA obligations, CNBF originates small loans to businesses and uses its real estate lending expertise to originate community development loans. In addition, the bank established a residential mortgage loan department that specializes in loans to low- and moderate-income borrowers. CNBF did not purchase any residential mortgages or loans to small businesses during the evaluation period.

CNBF offers a full range of financial products and services through a 26- branch network in Miami-Dade (15), Broward (5), and Palm Beach (3) Counties as well as in Orange County (2) and Martin County (1). Miami-Dade County represents the core of the bank's business, with 90 percent of total deposits as of June 30, 2011 and 67 percent of the total number of loans analyzed as part of this examination.

There are no legal or financial factors impeding the bank's ability to help meet the credit needs of its assessment area. However the bank faced some challenges due to the impact of the recession and the housing crisis as discussed throughout the Public Evaluation. These factors were considered as part of this evaluation. The bank's rating at the last CRA examination, dated May 18, 2009, was "Outstanding".

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending, Investment and Service Tests. In evaluating the bank's lending performance, we reviewed residential mortgage loans subject to reporting under the Home Mortgage Disclosure Act (HMDA), small loans to businesses subject to reporting under the CRA, and community development loans. We also evaluated community development investments and community development services.

The bank did not report any small loans to farms during the evaluation period. Therefore, tables for this product are not included in the Core Tables of this report (Appendix C). Home improvement loans and multi-family housing loans were not meaningful to overall performance due to low activity levels and no analysis was conducted; however, the tables are included.

The evaluation period for the Lending Test is January 1, 2009 through December 31, 2011. For the Investment and Service Tests the evaluation period is May 18, 2009, the date of the last CRA evaluation, through May 29, 2012. While the evaluation period for community development loans is generally consistent with the Investment and Service Test, at the bank's request we made the evaluation period for community development loans consistent with the overall Lending Test.

Our conclusions related to community development loans and qualified investments are based on the number and dollar amounts made during the evaluation period. In addition, we considered the level of innovation, complexity, responsiveness to community credit needs, and the degree to which investment instruments are not routinely provided by private investors.

Data Integrity

This evaluation is based on accurate data. We relied on the bank's HMDA policy and procedures as well internal compliance reviews and audits in concluding that HMDA data is accurate. A sample of small loans to businesses was drawn to determine the accuracy of such data. Some errors were noted; however, corrections were made and the corrected data was used at this examination. Community development loans, investments and services submitted by management were verified to ensure they met the regulatory definition for community development. Some items submitted for consideration were excluded from this evaluation because they did not meet the definition or purpose of community development.

Selection of Areas for Full-Scope Review

The bank currently has three assessment areas in Florida. The MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area will receive a full-scope review. It represents 97 percent of the bank's deposits as of June 30, 2011, and 92 percent of the total number of loans analyzed at this examination.

MSA 33100 is comprised of three Metropolitan Divisions (MDs), including: MD 33124 (Miami-Miami Beach-Kendall, FL) which consists of Miami-Dade County, MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL) which consists of Broward County, and MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) which consists of Palm Beach County. Each MD is referred to hereafter by its county name and is analyzed separately.

The remaining two assessment areas, which include MSA 38940 (Port St. Lucie-Fort Pierce, FL) comprised of Martin and St. Lucie Counties, and a portion of MSA 36740 (Orlando-Kissimmee, FL) including only Orange and Seminole Counties received a limited-scope review. Combined, these assessment areas represent three percent of the bank's total deposits as of June 30, 2011 and eight percent of the total number of loans analyzed at this examination. Refer to Appendix A for additional information regarding the assessment area receiving a full-scope review.

Ratings

The bank's overall rating is based on conclusions for the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area and is a consolidation of conclusions reached for each of the MDs that comprise the MSA. We placed the most weight on performance in Miami-Dade County. Miami-Dade County represents 92 percent of the bank's deposits in the overall MSA as of June 30, 2011 and 73 percent of the total number of MSA loans analyzed at this examination.

The volume of home mortgage and small loans to businesses was substantially equal; however we gave more consideration to small loans to business performance because such lending is the bank's primary business line. In addition, regarding home mortgage loans, the most weight was given to home purchase loans, which represent 73 percent of mortgage lending activity.

In determining conclusions related to lending activity, market share, home mortgage, and small business data was used for 2010. This was the most recent year for which data was available at the time of the examination.

Other

Community credit needs in the assessment area were determined by reviewing recent housing and demographic information and community contacts conducted by the OCC in connection with this and other CRA examinations of banks operating in the same assessment area. For this examination, we conducted a community contact with a non-profit community organization that primarily focuses on affordable housing. The most critical need identified by the organization is special mortgage products for low- and moderate-income borrowers. The contact noted that since the mortgage crisis, the availability of such products has been limited and many low- and moderate-income borrowers do not have the credit score now required to obtain mortgage credit.

Previous contacts discussed the need for affordable rental housing and noted that rent levels are increasing as demand increases due to economic conditions. The need for business financing, particularly start-up businesses, was also mentioned. Finally, several contacts commented on the need for financial literacy training including such topics as homeownership, credit, credit repair, and foreclosure prevention.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Florida is rated "outstanding". Based on a full-scope review, the bank's performance in MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) is excellent. Performance is excellent in Broward and Miami-Dade Counties and good in Palm Beach County.

Lending Activity

Refer to Table 1 Lending Volume section of Appendix C for the facts and data used to evaluate the bank's lending activity.

Overall, the bank's lending activity reflects good responsiveness to assessment area credit needs, given performance context. Home mortgage lending activity is adequate and small business lending activity is good, given performance context. Overall, the bank's lending activity in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is good, given performance context. Lending activity is excellent in Broward County and Palm Beach Counties, and good in Miami-Dade County, given performance context.

Multiple performance context factors had an impact on the bank's lending activity. Most importantly, CNBF's primary business strategy is business lending. Historically it has not been a traditional retail focused institution and it does not actively market a variety of home mortgage products, as many other lenders do in the assessment area. Mortgage lending is not a primary business line, with the exception of the bank's City Smart Community Mortgage product, which focuses on mortgage loans to low-and moderate-income borrowers. This strategy had a particular impact on the bank's ability to originate refinance loans as it does not have a large portfolio of existing borrowers for whom refinancing could be an option. The majority of existing borrowers have used some form of assistance to purchase their homes and many times these programs do not allow for refinancing or have provided such a low interest rate that it is not practical for the borrower to refinance.

In the later part of the evaluation period the volume of home purchase City Smart Community Mortgage loans was negatively impacted by increased marketing of FHA loans, primarily by the larger banks. This product became more competitive, offering lower interest rates than could be offered by CNBF. At this time CNBF does not have the staffing or expertise necessary to offer FHA loans.

In addition, the assessment area is highly competitive with a large number of lenders reporting home mortgage loan activity. These lenders include multiple non-bank lenders that do not take deposits in the assessment area as well as large banks with a nationwide presence that offer a wide variety of home mortgage loan products, including FHA loans, against which CNBF cannot compete. These large banks generally dominate the home loan market in all of the bank's assessment areas.

Economic conditions, including high foreclosure rates, high unemployment rates, and a large number of homes with negative equity impacted overall lending activity during the evaluation period, not just for CNBF but for all lenders in the bank's assessment areas. For a further discussion on these and other performance context issues, please see the Market Profile in Appendix C. For further discussion on the City Smart Community Mortgage product please see the Product Innovation and Flexibility section of the Lending Test.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Overall, lending activity in Broward County is excellent, given performance context. Lending activity is good for home mortgage loans and excellent for small loans to businesses, given performance context.

FDIC data as of June 30, 2010 shows that CNBF had a deposit market share of .026 percent and was ranked 35th among 66 financial institutions reporting deposits in Broward County. Deposit market share was dominated by Bank of America, National Association and Wells Fargo Bank, National Association who rank 1st and 2nd, respectively, and have a combined deposit market share of 42 percent.

For home purchase loans, CNBF's market share is near its deposit market share and its home purchase market rank is somewhat lower than its deposit market rank. CNBF's market share (by number), based on aggregate data from 2010 is 0.23 percent, and the bank is ranked 56th of 379 lenders reporting home purchase loans in Broward County. For refinance loans, both the bank's loan market share and rank are somewhat lower than its deposit market share and rank. CNBF has a refinance loan market share of 0.14 percent (by number) and is ranked 65th of 352 lenders reporting refinance loans in Broward County. In Broward County the home purchase market is dominated by Bank of America and Wells Fargo who rank 1st and 2nd, respectively, with a combined market share of 33 percent. For refinance loans the market is dominated by Wells Fargo, Bank of America, and JPMorgan Chase who rank 1st, 2nd, and 3rd, respectively and have a combine market share of 49 percent.

Lending activity for small loans to businesses is excellent. The bank's market share and rank of small loans to businesses exceeds its deposit market share and rank for a comparable period. Based on 2010 aggregate data the bank's market share of small loans to businesses is 1.46 percent (based on dollar volume), and the bank is ranked 14th of 114 lenders reporting such loans in the county. Market share and rank are based on the dollar volume of loans rather than number of loans because of the inclusion of credit card lenders in small loans to businesses reporting. Credit card lenders originate a large number of small loans to businesses, but the dollar volume is significantly smaller. For example, the top six reporters of small loans to businesses are all credit card lenders that combined have a market share of 85 percent based on number of loans but only 31 percent based on dollar volume. Therefore, a comparison based on dollar volume of loans is deemed more meaningful.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

Overall, lending activity in Miami-Dade County is good, given performance context. Lending activity is adequate for home mortgage loans, given performance context. Lending activity for small loans to businesses is good, given performance context.

Considering performance context, home mortgage lending activity is adequate. CNBF's market share and rank for home mortgage loans is significantly lower than its deposit market share and rank for a comparable period, however, this performance is adequate when consideration is given to the performance context factors previously discussed.

FDIC data as of June 30, 2010 shows that CNBF had a deposit market share of 3.45 percent and was ranked 10th among 72 financial institutions reporting deposits in Miami-Dade County. Deposit market share is dominated by Wells Fargo Bank, National Association and Bank of America, National Association who rank 1st and 2nd, respectively, and have a combined deposit market share of 26 percent.

For home purchase loans, CNBF's market share (by number), based on aggregate data from 2010 is .42 percent, and the bank is ranked 40th of 309 lenders reporting home purchase loans in Miami-Dade County. For refinance loans, the bank has a market share of .39 percent (by number) and is ranked 37th of 318 lenders reporting refinance loans in Miami-Dade County. In Miami-Dade County the home purchase market is dominated by Bank of America and Wells Fargo who rank 1st and 2nd, respectively, with a combined market share of 30 percent. For refinance loans the market is dominated by Wells Fargo, JPMorgan Chase, and Bank of America who rank 1st, 2nd, and 3rd, respectively, and have a combined market share of 47 percent.

Given performance context, particularly economic conditions during the evaluation period and the high level of competition in the county, small business lending activity is good. The bank's market share of such loans is somewhat lower than its deposit market share and its rank is near its deposit share rank. Based on 2010 aggregate data the bank's market share of loans to small businesses is 2.83 percent (based on dollar volume) and the bank is ranked 11th of 104 lenders reporting such loans in Miami-Dade County. Market share and rank are based on the dollar volume of loans rather than number of loans because of the inclusion of credit card lenders in small loans to businesses reporting. Credit card lenders originate a large number of small loans to businesses, but the dollar volume is significantly smaller. For example, the top six reporters of small loans to businesses are all credit card lenders that combined have a market share of 80 percent based on number of loans but only 25 percent based on dollar volume. Therefore, a comparison based on dollar volume of loans is deemed more meaningful.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Overall, lending activity in the Palm Beach County is excellent, given performance context. Lending activity is adequate for home mortgage loans and excellent for small loans to businesses, given performance context.

Considering performance context, home mortgage lending activity is adequate. CNBF's market share and rank for home mortgage loans is significantly lower than its deposit market

share and rank for a comparable period; however, this performance is considered adequate when consideration is given to performance context factors previously discussed.

FDIC data as of June 30, 2010 shows that CNBF had a deposit market share of 0.26 percent and was ranked 39th among 58 financial institutions reporting deposits in Palm Beach County. Deposit market share is dominated by Wells Fargo Bank, National Association and Bank of America, National Association who rank 1st and 2nd, respectively, and have a combined deposit market share of 39 percent.

For home purchase loans, CNBF's market share (by number), based on aggregate data from 2010 is .09 percent, and the bank is ranked 89th of 386 lenders reporting home purchase loans in the county. For refinance loans, the bank has a market share of 0.01 percent (by number) and is ranked 282nd of 378 lenders reporting refinance loans in the county. In Palm Beach County the home purchase market is dominated by Bank of America and Wells Fargo lenders who rank 1st and 2nd, respectively, with a combined market share of 33 percent. For refinance loans the market is dominated by Wells Fargo, JPMorgan Chase, and Bank of America who rank 1st, 2nd, and 3rd, respectively, and have a combined market share of 46 percent.

Lending activity for small loans to businesses is excellent. The bank's market share and rank of small loans to businesses exceeds its deposit market share and rank for a comparable period. Based on 2010 aggregate data the bank's market share of small loans to businesses is .35 percent (based on dollar volume,) and the bank is ranked 27th of 123 lenders reporting small loans to businesses in the county. Market share and rank are based on the dollar volume of loans rather than number of loans because of the inclusion of credit card lenders in the small loans to businesses reporting. Credit card lenders originate a large number of small loans to businesses, but the dollar volume is significantly smaller. For example, the top six reporters of small loans to businesses are all credit card lenders that combined have a market share of 84 percent based on number of loans but only 29 percent based on dollar volume. Therefore, a comparison based on dollar volume of loans is deemed more meaningful.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 and 4 of Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations.

Overall, the geographic distribution of loans is excellent, given performance context. The geographic distribution of loans is excellent based on a full-scope review of performance in the MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area. The geographic distribution of home mortgage loans is good and the geographic distribution of small loans to businesses is excellent, given performance context. Overall geographic distribution is excellent in Miami-Dade County and good in Broward and Palm Beach Counties, given performance context. In all three counties, the geographic distribution of home mortgage loans is good, given performance context. The geographic distribution of small loans to businesses is excellent in Miami-Dade County and good in Broward and Palm Beach Counties, given performance context.

While performance context factors had a negative impact on home mortgage lending overall during the evaluation period, it had the most negative impact on lender's ability to originate

refinance loans as a large number of potential borrowers no longer qualified. In the bank's overall MSA assessment area large numbers of homes were in a negative equity position as home prices declined drastically. High unemployment rates, which impacted low- and moderate-income persons the most, contributed to the issue, along with the tightening of loan underwriting criteria by the secondary market and banks reduced the volume of refinance loans. Specific to CNBF, borrowers generally approach their current lender to refinance their home loan. CNBF does not have a large portfolio of home mortgages from which applications for refinance would come, as discussed in the Lending Activity portion of this performance evaluation. In addition, competition from FHA loans, also previously discussed, had an impact on the bank's volume of home purchase loans which generally are for properties in low- and moderate-income geographies. In general, low- and moderate-income borrowers to whom the City Smart product is directed, purchase homes in low- and moderate-income geographies where homes are more affordable. Some moderate-income borrowers are in a position to qualify for the FHA product. For a further discussion of these and other performance context issues, please see the Market Profile in Appendix B.

Home Mortgage Loans

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

Overall, the geographic distribution of home mortgage loans is good, given performance context. The geographic distribution of home purchase loans is good and the geographic distribution of refinance loans is adequate, given performance context. The geographic distribution of home mortgage loans in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is good, given performance context. The geographic distribution of home mortgage loans in Broward and Miami-Dade Counties is good and excellent in Palm Beach County, given performance context.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Overall, the geographic distribution of home mortgage loans in Broward County is good, given performance context. The distribution of home purchase loans is good and distribution of refinance loans is adequate, given performance context.

The percentage of home purchase loans in low-income geographies significantly exceeds the percentage of owner-occupied housing units in those geographies. In moderate-income geographies the percentage of home purchase loans is somewhat lower than the percentage of owner-occupied housing units in those geographies. In both low- and moderate-income geographies, the bank's market share of home purchase loans exceeds its overall market share of home purchase loans.

For refinance loans, the percentage of loans in low-income geographies exceeds the percentage of owner-occupied housing units in those geographies and in moderate-income geographies the percentage of refinance loans is significantly lower than the percentage of owner-occupied housing units. For low-income geographies the bank's market share of refinance loans exceeds its overall market share of refinance loans, but the bank's market share of refinance loans is significantly lower in moderate-income geographies than its overall market share of refinance loans.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

Overall, the geographic distribution of home mortgage loans in Miami-Dade County is good, given performance context. The geographic distribution of home purchase loans is good and the distribution of refinance loans is adequate, given performance context.

In low-income geographies, the percentage of home purchase loans exceeds the percentage of owner-occupied housing units in those geographies. and the bank's market share of home purchase loans in low-income geographies exceeds the bank's overall market share of home purchase loans. In moderate-income geographies the percentage of the bank's home purchase loans is somewhat lower than the percentage of owner-occupied housing units in those geographies, and the bank's market share of home purchase loans in moderate-income geographies is also somewhat lower than its overall market share of home purchase loans.

The bank made no refinance loans in low-income geographies however only 1.69 percent of owner-occupied housing, or 7,600 units, are located in low-income geographies. In moderate-income geographies the percentage of refinance loans is significantly lower than the percentage of owner-occupied housing units; however, the bank's market share of refinance loans in moderate-income geographies is near to its overall market share of refinance loans.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Given performance context, the overall geographic distribution of home mortgage loans in Palm Beach County is excellent; however, this conclusion is based on a small number of loans (34). The geographic distribution of home purchase loans is excellent. The number of refinance loans (4) is not sufficient to draw a meaningful conclusion.

In both the low- and moderate-income geographies of Palm Beach County the percentage of the bank's home purchase loans significantly exceeds the percentage of owner-occupied housing units in those geographies. Also, the bank's market share of home purchase loans in both low- and moderate-income geographies exceeds the bank's overall market share of home purchase loans in Palm Beach County. Regarding refinance loans, the bank reported only four refinance loans for the evaluation period and none were in either low- or moderate-income geographies.

Small Loans to Businesses

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

The overall geographic distribution of small loans to businesses is excellent. Geographic distribution of small loans to businesses in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is excellent. The geographic distribution of small loans to businesses is good in Broward and Palm Beach Counties and excellent in Miami-Dade County.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

The geographic distribution of the bank's small loans to businesses is good. The percentage of small loans to businesses in low-income geographies exceeds the percentage of businesses in those geographies, and the bank's market share of small loans to businesses in low-income geographies exceeds the bank's overall market share of small loans to business. In moderate-income geographies the percentage of small loans to businesses is near to the percentage of businesses in those geographies. The bank's market share of small loans to businesses in moderate-income geographies is near to the bank's overall market share of small loans to businesses.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

The geographic distribution of the bank's small loans to businesses is excellent. The percentage of small loans to businesses in both low- and moderate-income geographies exceeds the percentage of businesses in those geographies. The bank's market share of small loans to businesses in both low- and moderate-income geographies exceeds the bank's overall market share of small loans to business.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

The geographic distribution of the bank's small loans to businesses is good; however, this conclusion is based on a small number of loans (40). The bank had no small loans to businesses in low-income geographies however opportunities are limited to approximately 7,000 businesses, while the number of reporters of small loans to businesses exceeds 100 in the county. The percentage of small loans to businesses in moderate-income geographies exceeds the percentage of businesses in those geographies. The bank's market share of small loans to businesses in moderate-income geographies exceeds the bank's overall market share of small loans to business.

Lending Gap Analysis

CNBF's reports detailing lending activity over the evaluation period for home mortgage and small loans to businesses were reviewed to identify gaps in the geographic distribution of loans. No unexplained conspicuous gaps were identified.

Inside/Outside Ratio

A substantial majority of home mortgage and small loans to businesses originated by CNBF during the evaluation period are within the bank's overall assessment area. Overall, 93 percent of loans by number, and 92 percent by dollar amount are inside the bank's overall assessment area. This performance was positively factored into the overall analysis of the distribution of loans by income level of the geography.

By product, 89 percent of home purchase loans by number, and 87 percent by dollar amount are inside the overall assessment area, and 94 percent of refinance loans by both number and dollar amount are inside the overall assessment area. For small loans to businesses, 96 percent of loans by number and 95 percent by dollar amount are inside the bank's overall assessment area.

Distribution of Loans by Income Level of the Borrower

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

Overall, the bank's distribution of loans by income level of the borrower is adequate, given performance context. The distribution of home mortgage loans is good and the distribution of small loans to businesses is adequate, given performance context. The bank's distribution of loans by the income level of the borrower in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is adequate, given performance context. Borrower distribution is good in Broward County and adequate in Miami-Dade and Palm Beach Counties, given performance context. The distribution of home mortgage loans is good and the distribution of small loans to businesses is adequate, given performance context.

Home Mortgage Loans

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

Overall, the distribution of home mortgage loans by the income level of the borrower in the MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is good, given performance context. The distribution of home mortgage loans by income level of the borrower is good in Broward and Miami-Dade Counties, and excellent in Palm Beach County, given performance context.

During the evaluation period, performance context issues made it difficult to provide home mortgage loans to low-income borrowers in the overall MSA assessment area. For this reason, somewhat more weight was given to lending to moderate-income borrowers in reaching our conclusions.

Starting in 2006, housing prices began to fall drastically throughout all portions of the MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area as a result of the housing and economic crisis. As prices declined, homes were more affordable but the availability of subsidies that were still needed, particularly by low-income borrowers, was reduced. In addition, the assessment area's high poverty and unemployment rates, which increased during the evaluation period, further limited the ability of many low-income families and some moderate-income families to become homeowners, even if subsidy programs were timely and readily available. High property taxes and homeowner's insurance costs also contribute to the inability of low-income and many moderate-income borrowers to become home owners. Also, many lower priced homes were quickly purchased for cash by investors further limiting the number of affordable homes available to low- and moderate-income buyers. Impacting CNBF's performance is the lower rate FHA product being offered by other lenders, which may have reduced the volume of loans to moderate-income buyers who are more in a position to meet FHA guidelines.

In addition, it should be noted that the demand for refinance loans by low-income families is generally very limited. Many times low-income families have taken advantage of various subsidy programs and special mortgage products that have very low interest rates that would

not make it necessary for them to refinance for a lower interest rate. Also, some special programs do not allow for refinancing.

For further discussion on performance context issues, please see the Market Profiles in Appendix B.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Overall, the distribution of home mortgage loans by the income level of the borrower in Broward County is good, given performance context. The distribution of home purchase loans is excellent and the distribution of refinance loans is adequate, given performance context.

The percentage of home purchase loans to low-income borrowers is somewhat lower than the percentage of low-income families in the county, but consistent with performance context issues noted above. The percentage of home purchase loans to moderate-income borrowers significantly exceeds the percentage of moderate-income families in the county. In both low- and moderate-income geographies the bank's market share of home purchase loans exceeds its overall market share of home purchase loans.

For refinance loans, the percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families in the county, but not inconsistent with performance context issues noted above. The percentage of the bank's refinance loans to moderate-income borrowers is lower than the percentage of moderate-income families in the county, but consistent with performance context. The bank's market share of refinance loans to low-income borrowers exceeds its overall market share of refinance loans but its market share of refinance loans to moderate income borrowers is somewhat lower than the bank's overall market share of refinance loans.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

Given performance context, the distribution of home mortgage loans by income level of the borrower in Miami-Dade County is good. The distribution of home purchase loans is excellent and the distribution of refinance loans is adequate, given performance context.

The percentage of home purchase loans to low-income borrowers is significantly lower than percentage of low-income families in the county, but consistent with performance context. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the county. The bank's market share of home purchase loans to low-income borrowers is lower than its overall market share of home purchase loans, but the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall market share of home purchase loans.

For refinance loans to both low- and moderate-income borrowers the percentage of loans is significantly lower than the percentage of such families in the county, but this performance is consistent with performance context. The bank's market share of refinance loans to both low- and moderate-income borrowers is somewhat lower than the bank's overall market share of refinance loans.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Given performance context, the overall distribution of home mortgage loans by income level of the borrower in Palm Beach County is excellent; however, this conclusion is based on a small number of loans (34). The distribution of home purchase loans is excellent. The number of refinance loans (4) is not sufficient to reach a meaningful conclusion.

Home purchase loans to low-income borrowers are somewhat lower than the percentage of low-income borrowers in the county. The bank's market share of home purchase loans to low-income borrowers is somewhat lower than its overall market share of home purchase loans in Palm Beach County. Home purchase loans to moderate-income borrowers exceeds the percentage of such borrowers in the assessment area, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall market share of home purchase loans in Palm Beach County.

Regarding refinance loans, the bank reported only four such loans during the evaluation period in Palm Beach County. None was to low- or moderate-income borrowers.

Small Loans to Businesses

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

Overall, the borrower distribution of small loans to businesses is adequate. The borrower distribution of small loans to businesses in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is adequate. The distribution is good in Broward County and adequate in Miami-Dade and Palm Beach Counties.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

The distribution of small loans to businesses in Broward County is good. The bank's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) is near to the percentage of small businesses located in Broward County. The bank's market share of small loans to small businesses exceeds its overall market share of small loans to small businesses.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

The distribution of small loans to businesses in Miami-Dade County is adequate. The bank's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) is somewhat lower than the percentage of small businesses located in Miami-Dade County. The bank's market share of small loans to small businesses exceeds its overall market share of small loans to small businesses.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

The distribution of small loans to businesses in Palm Beach County is adequate. The bank's percentage of small loans to small businesses (businesses with annual revenues of \$1 million

or less) is somewhat lower than the percentage of small businesses located in Palm Beach County. The bank's market share of small loans to small businesses exceeds its overall market share of small loans to small businesses.

Community Development Lending

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

In addition to the community development loans in CNBF's assessment area, the bank also originated three new community development loans totaling \$1.2 million outside its assessment area. As with the bulk of the affordable housing loans discussed below, these loans represent the bank's participation with a non-profit housing development organization. The funds from the bank's participation are being used to help finance the construction of a total of 84 rental units affordable to low- and moderate-income tenants in Monroe County, which is south and directly adjacent to Miami-Dade County. Low Income Housing Tax Credits were used for the three phases of this project. Because the bank adequately met community development needs in its assessment area, positive consideration was given to the three loans.

Overall, the bank's community development lending activity in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is excellent and it had a positive impact on the overall Lending Test rating. Performance is excellent in Broward, Miami-Dade and Palm Beach Counties and it had a positive impact on overall Lending Test conclusions for those counties.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

CNBF has an excellent level of community development loans in Broward County considering the level of its presence in the county. This performance had a positive impact on the overall Lending Test conclusion for Broward County.

During the community development evaluation period, the bank made five community development loans in Broward County totaling \$11 million dollars. Virtually all (\$10.3 million representing 4 loans) community loan activity helped to revitalize and stabilize low- and moderate-income geographies. Of these four loans, two are providing working capital to existing business so they can maintain operations thus retaining 78 jobs. The remaining two are to purchase a shopping center and an office building, both in moderate-income geographies. These loans will help to stabilize the geographies by retaining jobs and providing necessary services. One community development loan totaling \$475,000 helped to provide eight units of rental housing affordable to low- and moderate-income residents. The retention of jobs is responsive to assessment areas needs as evidenced by the high unemployment rates throughout the evaluation period.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

CNBF has an excellent level of community development loans in Miami-Dade County. This performance had a positive impact on the overall Lending Test conclusion for Miami-Dade County.

During the community development evaluation period, the bank made 24 community development loans, totaling \$71 million dollars. Of the total, 66 percent of loan funds (\$46.7 million, representing 9 loans) were used to help revitalize and stabilize low- and moderate-income geographies. These loans either provide working capital funds to existing businesses and thus retain jobs, or were used for the purchase of new or existing businesses that will provide new or retain existing jobs in low- or moderate-income geographies for low- and moderate-income workers. Of particular interest, the bank's largest community development loan is to a company that purchased a vacant theatrical building in a moderate-income geography of the county, which is included in the City of Miami Beach's Community Redevelopment Area. After renovation, the building will be a 34,000 square foot retail complex that will provide new permanent jobs for many low- and moderate-income workers. The anchor tenant is expected to bring approximately 75 jobs to this moderate-income area.

Approximately 26 percent of community development loan dollars (\$18.7 million) represent renewals of loans and lines to a community service organization operating in Miami-Dade County. Although the organization offers numerous programs, it primarily provides job training and placement for individuals who presently live at or below the poverty level. The loans are responsive to the need for job training for low- and moderate-income people as articulated by a prior community contact, and can help to reduce the current high unemployment rates in Miami-Dade County.

CNBF originated ten new loans totaling \$5.7 million (8 percent) that help meet critical affordable rental housing needs in the county. All but one of these loans represents the bank's participation with a non-profit affordable housing development organization that extends loans to affordable housing builders from a pool of loan funds from member banks. The bank's participations, which totaled \$5.4 million, helped to provide rental housing affordable to low- and moderate-income senior citizens. By using Low Income Housing Tax Credits, the developers worked to construct 680 affordable senior citizen rental housing units in Miami-Dade County. The bank's participations are responsive to the need for affordable rental housing for seniors, which is a long term need in the assessment area.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

CNBF has an excellent level of community development loans in Palm Beach County considering the level of its presence in the county. This performance had a positive impact on the overall Lending Test conclusion for Palm Beach County.

The bank originated three community development loans totaling \$10.3 million in Palm Beach County during the evaluation period. Two loans totaling \$7.9 million helped to revitalize and stabilize two different moderate-income geographies. The loans provided financing for the acquisition and rehabilitation of office and retail facilities, thereby retaining jobs and helping to provide needed services, including a credit union and non-profit day care facility, to the moderate-income geographies. The third loan was responsive to affordable housing needs,

which is known to be a critical need in the county. The loan is helping to make 73 units of HUD Section 8 rental housing available to low- and moderate-income tenants.

Product Innovation and Flexibility

The bank makes good use of flexible mortgage programs to help meet credit needs in its assessment area. CNBF's use of these flexible programs had a positive impact on conclusions under the Lending Test.

Throughout all portions of the MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area, CNBF offers its City Smart Community Mortgage Program which is targeted to low- and moderate-income homebuyers. A proprietary product initiated by the bank, the mortgage features flexible underwriting criteria, 95 percent loan-to-value ratios, no private mortgage insurance requirements, and reduced closing costs. During the evaluation period, the bank originated 226 City Smart mortgages in the full-scope MSA 33100 assessment area.

City Smart Mortgages allow for multiple layers of financing, enabling borrowers to participate in programs designed to assist low- and moderate-income individuals and families to become homeowners. Local community development corporations (CDCs) and cities often have home purchase assistance programs that can benefit City Smart borrowers and in some cases, HUD Section 8 housing assistance payments can be used for mortgage payments.

Originated City Smart loans are included with the bank's home mortgage loans analyzed in other portions of the Lending Test.

Additionally, the bank had a Financial Hardship Payment and Loan Modification Program in place during the evaluation period. Under the program, existing borrowers impacted by a financial hardship and meeting certain criteria can have payments deferred for a maximum of 90 days. The bank extends the term of the loan based on the amount of time payments are deferred and does not charge interest on the deferred payments. During the evaluation period, 264 borrowers were assisted under the program, and 108, or 41 percent, were to borrowers with homes located in low- or moderate-income geographies. Loan modifications are not analyzed in other portions of the Lending Test.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in MSA 36740 (Orange and Seminole Counties only) and MSA 38940 (St. Lucie and Martin Counties) is weaker than the bank's overall performance in the state. Performance is weaker in all segments of the Lending Test with the exception of community development loans where performance was consistent with the bank's performance in the full-scope MSA 33110 assessment area. Performance in the limited-scope assessment areas had a neutral impact on the overall Lending Test conclusion. Refer to the Tables 1 through 11 of Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Florida is rated "outstanding". Based on a full-scope review, the bank's performance in MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) is excellent. Performance is excellent in Broward and Miami-Dade Counties and poor in Palm Beach County.

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

During the community development evaluation period, the bank made a \$5 million investment in a CRA qualified investment fund. The investment is backed by multiple mortgages on properties that are helping to provide rental housing affordable to low- and moderate-income residents. This investment is shown in Table 14 under "MSA 33110" investments because it benefitted both Miami-Dade and Broward Counties. The impact of the investment is taken into consideration when reaching conclusions about performance in each of the counties. Also, the bank has a prior period investment in the Florida Housing Tax Credit Fund, Ltd, which serves all of the state of Florida, with the potential to serve the bank's assessment area. This investment is shown under the caption "Statewide" and it helps the Fund continue meeting affordable housing needs in Florida, and potentially within the bank's assessment area.

Overall, the bank's community development investments are responsive to assessment area needs, primarily addressing the need for affordable housing and permanent jobs for low- and moderate income persons. Affordable housing needs are considered critical throughout the overall MSA assessment area, as are jobs, as evidenced by high unemployment rates. Investments are not considered innovative or complex and private investors routinely provide these types of qualified investments. For a discussion of investment opportunities, see the Market Profile in Appendix B.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Investment performance in Broward County is excellent when considering the impact of the MSA investment.

During the current evaluation period, the bank had 17 qualified investments totaling \$26,000 in Broward County. All are donations to organizations whose primary mission meets the definition of community development, primarily affordable housing and community services. Also, Broward County benefited from approximately 30 percent of the MSA investment discussed above. The loan in Broward County that secures the investment is for a 312 unit rental complex in Broward County built using Low Income Housing Tax Credits and where rents are affordable to low- and moderate-income residents. The mortgage is important because it allows for the complex to continue providing affordable rents that meet the identified need for affordable rental housing for low- and moderate-income families and individuals.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

Investment performance in Miami-Dade County is excellent.

During the current evaluation period, the bank had 86 qualified investments totaling \$28 million in Miami-Dade County. Of those investments, 63 investments totaling \$146,000 are donations to organizations whose primary mission meets the definition of community development, primarily affordable housing and community services. Of primary importance is the bank's \$23 million investment in a bond that helped to finance construction and improvements to a spectator sports facility in the county. Located in a moderate-income geography the facility helps to stabilize the geography by providing numerous permanent new and existing jobs for primarily low- and moderate-income workers.

The remaining 22 investments, totaling \$4.9 million are new and renewal certificate of deposits in 10 different minority-owned financial institutions operating in Miami-Dade County. Of the total dollar amount, about 55 percent represents renewals of the original deposits. These deposits assist minority-owned financial institutions in providing loans in Miami-Dade County.

Approximately 70 percent of the MSA investment discussed above benefitted Miami-Dade County. Four of the loans supporting the investment are helping to provide 549 rental units in Miami-Dade County using Low Income Housing Tax Credits, and where rents are affordable to low- and moderate-income residents. The mortgages are important because they allow for the housing complexes to continue providing affordable rents that meet the identified need for affordable rental housing for low- and moderate-income families and individuals.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Investment performance in Palm Beach County is poor. At the current examination the bank has eight qualified investments totaling \$13,000 which are donations to organizations in Palm Beach County whose primary mission meets the definition of community development.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in MSA 36740 (Orange and Seminole Counties only) is consistent with the bank's overall outstanding performance under the Investment Test. In the MSA 38940 (St. Lucie and Martin Counties) the bank's performance is weaker than the bank's overall performance. The volume of investments was poor. Performance in the limited-scope assessment areas had a neutral impact on the Investment Test conclusion. Refer to the Tables 14 in Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Outstanding". Based on a full-scope review, the bank's performance in MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) is excellent. Performance is excellent in Miami-Dade and Broward Counties and good in Palm Beach County.

Retail Banking Services

The bank's retail service delivery systems are excellent and readily accessible to geographies and individuals of different income levels. Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Service delivery systems in Broward County are readily accessible to geographies and individuals of different income levels. Of five branches, one is located in a low-income geography and one in a moderate-income geography. The percentage of the bank's branches in low-income geographies exceeds the percentage of population residing in low-income geographies. The percentage of the bank's branches in moderate-income geographies is near to the percentage of population residing in moderate-income geographies. In addition, two of the five branches located in middle-income geographies (Pompano and Hallandale) are immediately adjacent to low- and/or moderate- income geographies and help to provide retail banking services to those geographies. Each branch has an Automated Teller Machine (ATM).

No branches were closed. Three branches were opened in Broward County during the evaluation period. One of the three branches was opened in a moderate-income geography. This improved the accessibility of the bank's retail delivery system particularly in moderate-income geographies and had a positive impact on our overall conclusion on retail banking services in Broward County.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

When consideration is given to alternative delivery systems and low-cost banking products, service delivery systems in Miami-Dade County, as discussed below, are readily accessible to geographies and individuals of different income levels. Of the 15 branches, three are located in low- income geographies and two are in moderate-income geographies. The percentage of branches in low-income geographies exceeds the percentage of population residing in such geographies. The percent of branches in moderate-income geographies is somewhat lower than the percentage of population residing in moderate-income geographies. However, two branches (Coral Gables and North Miami), located in middle-income geographies, are immediately adjacent to moderate-income geographies and help to provide retail banking services to those geographies. The branches are located in central business areas that commonly serve the neighboring moderate-income geographies. All branches have ATMs.

No branches were closed during the evaluation period. Two branches were opened with one in an upper- income geography and one in a middle-income geography. These openings have not adversely affected the accessibility of retail delivery systems in low- and moderate-income geographies.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Branches in Palm Beach County are reasonably accessible to geographies and individuals of different income levels. Of the three branches, none are located in a low-income geography and one is located in a moderate-income geography. The percentage of the bank's branches in moderate-income geographies exceeds the percentage of population residing in moderate-income geographies. While the bank has no branches in low-income geographies, only four percent of the population (48,000) resides in low-income geographies.

No branches were opened or closed in Palm Beach County during the evaluation period, having a neutral impact on overall retail banking services.

Branch locations are augmented by a variety of alternative delivery systems, the most important of which is CNB@Work. A CNB@Work Checking Account is available to employees of the bank's business clients who sign-up for the program. The account allows for payroll direct deposit and provides a checking account with no monthly maintenance fees, no minimum opening or balance requirements, and no per check charges. Customers have free unlimited use of an ATM or check card at any CNBF ATM or Presto ATM. During the evaluation period, the bank opened 3,886 accounts virtually all in the MSA 33100 assessment area and primarily in Miami-Dade County. A sample of these accounts indicates a significant number for employees who typically earn salaries that would fall into the low- or moderate-income categories. These employees work for such companies as Goodwill, Miami-Dade County, and United Way.

ATM facilities also provide enhanced availability of banking services to low- and moderate-income persons and geographies. All branch offices located in low- and moderate-income geographies have ATMs. CNBF also operates seven off-site ATMs, five of which are located in Miami-Dade County. One of these is located in a low-income geography and one in a moderate-income geography, helping to enhance retail delivery in the low- and moderate-income geographies of Miami-Dade County. CNBF customers have free access to any Presto ATM located at Publix grocery stores throughout the assessment area.

Other alternative delivery systems include telephone banking, remote deposit capture for commercial customers, and online banking with bill pay. There is no data regarding the impact of these alternative options on low- and moderate-income persons or geographies therefore no significant weight was given to these systems.

A wide range of banking products and services are offered throughout the overall MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area as described in the bank's Public File. Products, services and business hours are reasonable and are comparable among branch locations, regardless of the income level of the geography in all counties in the MSA 33100 assessment area. Of particular note are two low-cost products:

- City Smart Mortgage Checking and Savings. These free, low-minimum balance accounts are offered in conjunction with the City Smart Mortgage product, which is directed to low- and moderate-income homebuyers. A matching deposit of \$50 is made to a new City Smart Savings account. During the overall evaluation period, 37 accounts were opened.
- City Smart Ultimate Small Business Checking Account. This account requires only a \$100 deposit to open. There is no minimum balance requirement, no monthly account charge, and up to 200 free transactions each month, along with free bill paying, a business check card, and unlimited use of CNBF and Presto ATMs. During the evaluation period, 3,686 accounts were opened, virtually all in the MSA 33100 assessment area and primarily in Miami-Dade County.

Community Development Services

The bank's provision of community development services in the overall full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is good. CNBF provides a relatively high level of community development services throughout the full-scope assessment area that are responsive to assessment area needs, particularly those related to financial literacy training and affordable housing. The provision of community development services is good in Miami-Dade and Broward Counties and adequate in Palm Beach County.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Considering the level of the bank's presence in Broward County, CNBF provided a good level of community development services. During the evaluation period, bank records indicate that bank employees spent approximately 426 hours on community development services conducted through 12 local community based organizations that have the primary mission to assist with housing opportunities affordable to low- and moderate income individuals and families. Bank employees also provided technical assistance to local nonprofit organizations by serving as board members. CNBF's community development lender conducted 37 First Time Home Buyer seminars. Bank records indicate 635 people attended First Time Home Buyer seminars. A financial literacy seminar conducted by a residential lender had approximately 400 people in attendance. The programs, presented in both English and Spanish, include discussions on budgeting, savings, the loan process, credit, etc.

Examples of organizations that CNBF frequently partners with in providing community development services includes the Broward County Housing Authority, an organization focused on creating, providing and increasing affordable housing opportunities to Broward County residents and Oasis of Hope Community Development Corporation that provides basic community housing services to low- and moderate-income families and individuals.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

CNBF provides a good level of community development services in Miami-Dade County. During the evaluation period, bank records indicate that bank employees spent approximately 1,032 hours on community development services conducted through 22 local community based organizations that have the primary mission to assist with housing opportunities

affordable to low- and moderate income individuals and families. Bank employees also provided technical assistance to nonprofit organizations by serving as board members, and significant tax preparation assistance to low- and moderate-income persons. CNBF's community development lender conducted 21 First Time Home Buyer seminars. Bank records indicate 413 people attended First Time Home Buyer seminars. A financial literacy seminar conducted by a residential lender had approximately 30 people in attendance. The programs, presented in both English and Spanish, include discussions on budgeting, savings, the loan process, credit, etc.

Examples of organizations that CNBF frequently partners with in providing community development services include the Opa-Locka Community Development Corporation, an organization focused on providing affordable housing and supportive service for low- and moderate-income families, and Volunteer Income Tax Assistance (VITA) where bank employees devoted a considerable effort into the preparation of tax returns for low- and moderate-income individuals and families with a combined income of \$39 thousand or less. In addition, the bank partnered with the Miami Chamber of Commerce to provide "Financial Boot Camp", a financial literacy program, at two Miami high schools that primarily serve low- and moderate-income students.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Considering the bank's limited presence, CNBF provides an adequate level of community development services in Palm Beach County. During the evaluation period, bank records indicate that bank employees spent approximately 94 hours on community development services conducted through five local community based organizations that have the primary mission to assist with housing opportunities affordable to low- and moderate income individuals and families. Bank employees provided technical assistance to nonprofit organizations by serving as board members. CNBF's community development lender conducted three First Time Home Buyer seminars. Attendance information was not available

An example of an organization that CNBF frequently provides a community development service to includes the Life Improvement for Tomorrow organization that is focused on empowering individuals toward economic self-sufficiency through personal support and credit counseling, encouraging low- and moderate income individuals to manage their income, and become home owners.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the MSA 36740 (Orange and Seminole Counties only) is not inconsistent with the bank's overall rating. Performance in the MSA 38940 (St. Lucie and Martin Counties) is weaker than CNBF's overall performance. The bank's only office in that assessment area is not located in a low- or moderate-income geography.

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”).

Time Period Reviewed	Lending Test : 01/01/09 to 12/31/11 Investment and Service Tests : 05/18/09 to 05/29/12	
Financial Institution		Products Reviewed
City National Bank of Florida Miami, FL		Home Mortgage Loans Small Loans to Businesses Community Development Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
MSA 33100 (Miami-Miami Beach-Kendall, FL) MSA 38940 (Port St. Lucie-Ft. Pierce, FL) MSA 36740 (Orlando-Kissimmee, FL)	Full-Scope Limited-Scope Limited Scope	(includes Orange and Seminole Counties only)

Appendix B: Market Profiles for Full-Scope Areas

MIAMI-FT. LAUDERDALE-PALM BEACH ASSESSMENT AREA (MSA 33100)

The full-scope assessment area consists of all of the Miami-Ft. Lauderdale-Palm Beach MSA, which includes all of the contiguous counties of Miami-Dade, Broward, and Palm Beach. The assessment area meets the requirements of the CRA regulation and does not arbitrarily exclude low- and moderate-income geographies.

Overall, the MSA has a total population of approximately 5 million people, with the largest concentration of population in the Miami-Dade County portion of the MSA. The Census Bureau has designated each of the three counties in the full-scope assessment area as a Metropolitan Division (“MD”). The accompanying tables and discussions focus on each of the MDs individually.

MD 33124 (Miami-Miami Beach-Kendall, FL)

Demographic Information for Full Scope Area: MD 33124 (Miami- Dade County, FL)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	347	7.78	28.53	32.85	29.97	0.86
Population by Geography	2,253,362	4.89	28.61	35.68	30.79	0.02
Owner-Occupied Housing by Geography	449,333	1.69	19.82	36.99	41.51	0.00
Business by Geography	304,953	4.91	22.10	32.30	40.27	0.42
Farms by Geography	3,499	2.60	19.03	34.01	44.21	0.14
Family Distribution by Income Level	552,484	23.00	16.98	18.53	41.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	220,856	8.31	40.20	35.41	16.08	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		\$40,266 \$51,900 18%	Median Housing Value Unemployment Rate (December 2011)		\$123,974 10.20%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census, 2011 HUD updated MFI, and Bureau of Labor Statistics.

MD 33124 is equivalent to Miami-Dade County. Based on the 2000 Census, Miami-Dade County consists of 347 census tracts (geographies) of which 27 (8%) are low-income, 99 (29%) are moderate-income, 114 (33%) are middle-income, and 104 (30%) are upper-income. Three tracts have no income designation generally because of low population levels. The greatest concentration of low- and moderate-income geographies can be found in the city of Miami.

Miami-Dade County is a densely populated urban center. According to the 2000 Census, the total population is 2.25 million, however, according to the 2010 Census the population has grown about 11 percent to 2.50 million. Approximately 16 percent of the population resides in the City of Miami. During the evaluation period the level of home owner occupancy declined

from approximately 60 percent to 58 percent as a result of the housing crisis. However, in low- and moderate-income geographies, the level of renter occupancy is high (69% and 56%, respectively), based on 2000 Census data. These geographies also represent high levels of households below the poverty level (47% and 27%, respectively), indicating a need for affordable rental housing. In the city of Miami, 27 percent of persons are living below the poverty level. These households would have difficulty qualifying for a home loan even at current housing prices. Prior community contacts indicate that the need for affordable rental housing is acute in Miami-Dade County as rent levels rose over the past several years.

Miami-Dade County has been severely impacted by the housing crisis. It consistently has some of the highest foreclosure rates in the United States and, according to Zillow.com as of the fourth quarter of 2011, 48 percent of homes with mortgages are in a negative equity position, limiting the owners' opportunity for mortgage refinancing. Home prices have fallen 50 percent or more since the highs of 2006 and condominium values declined 60 percent. The 2010 Census estimates the median value of owner-occupied housing units (2006-2010) in Miami-Dade County to be \$269,600. Median sales prices in Miami reportedly reached a low of \$149,000 in the third quarter of 2010. Considering that the HUD estimated median family income for 2009, 2010, and 2011 was \$50,800, \$52,200, and \$51,900, respectively and poverty levels in the county, it is clear that low-income and many moderate-income families generally could not afford mortgage payments, as well as taxes and insurance, unless subsidized and other special programs provided them with assistance during the initial purchase. However, current economic conditions have reduced the availability of such assistance. Also, realtors report investors are buying lower priced homes for cash reducing opportunities available to low- and moderate-income families that wish to occupy the property as their primary residence.

Local economic conditions are weak. In Miami-Dade County, housing starts declined to the lowest level in a decade. Construction and construction-related jobs drove the local economy and their decline led to high unemployment rates and the closing of many small businesses. According to Moody's Analysis, at the peak in 2005, 9,922 single-family housing permits were issued. In 2009 the number was 624, rising to 1,027 in 2010 and approximately 1,900 in 2011. The decline in jobs, particularly construction and construction-related jobs drove the county's unemployment rate to 12.4 percent as of December 31, 2010. As of December 31, 2011 the rate was 10.2 percent. These rates are higher than the state of Florida overall, which reported unemployment rates of 10.9 percent and 9.7 percent, respectively for the same time periods. This indicates a need for activities that support job creation, job placement and job training programs, and community services for low- and moderate-income persons and families.

Banking competition within the assessment area continues to be intense. In addition to community and mid-size banks, branches of the largest banks in the country operate in Miami-Dade County. As of June 30, 2011 there were 70 deposit taking financial institutions in Miami-Dade County operating 660 branches. CNBF had a deposit market share of 3.04 percent and the market continues to be dominated by Wells Fargo and Bank of America as discussed in the Lending Activity portion of this evaluation. In addition to competition for deposits and loans, the level of competition in the assessment area is very high for qualified community development investments and loans.

Opportunities for community development lending, investments, and services in Miami-Dade County are good. Opportunities exist to finance the purchase and/or rehabilitation of multi-

family housing units that provide affordable rental housing in low- and moderate-income geographies, but they have declined from previous levels because of the volume of condominium conversions during the height of the housing boom. Statewide affordable housing entities are continuing to construct affordable rental housing as are some local developers. They are either financed directly or through loan funds that rely on the participation of a group of local banks. There is a federally designated Empowerment Zone that targets economic development with the goal of revitalizing the area by stimulating and retaining jobs, and there are areas designated as Enterprise Zones which share the same goal.

The impact of the mortgage crisis caused some community development organizations to change their focus from new construction to acquiring foreclosed properties, rehabilitating them, and then making them available for rent or for sale to low- and moderate-income persons or families. Some of these activities are being funded through grants from the Neighborhood Stabilization Program (NSP) offered by the Department of Housing and Urban Development (HUD) which were awarded to Miami-Dade County and the city of Miami. Banking activities related to the NSP are given positive consideration under community development.

Community development investment options are available. Mortgage-backed securities backed by mortgages to low- and moderate-income borrowers are an option either directly or through loan funds that make investments in mortgage-backed securities. Low Income Housing Tax Credits remain available, but they are generally complex for community banks. Miami-Dade County, the State and the Region have community development financial institutions ("CDFIs") and private equity organizations which need support for their community development activities. Opportunities exist to contribute to qualified non-profit organizations whose missions are focused on providing affordable housing and community services for low- and moderate-income persons, particularly in the areas of job training and job placement, as noted by a community contact made for another CRA examination in the same assessment area. However, the extent of these activities has been impacted by the financial condition of some area banks.

Opportunities exist to provide financial literacy training in schools and in cooperation with local community organizations. This training could include homeownership, credit, foreclosure counseling, and information on general banking services to assist the un-banked population.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)

Demographic Information for Full Scope Area: MD 22744 (Broward County, FL)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	279	4.66	25.45	41.94	27.96	0.00
Population by Geography	1,623,018	3.57	26.43	43.13	26.88	0.00
Owner-Occupied Housing by Geography	454,625	1.16	23.67	45.93	29.24	0.00
Business by Geography	219,069	4.77	22.51	42.71	30.00	0.00
Farms by Geography	3,145	3.97	23.40	41.72	30.91	0.00
Family Distribution by Income Level	413,958	20.85	18.17	20.48	40.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	161,511	5.81	38.36	42.71	13.12	0.00
Median Family Income		\$50,570	Median Housing Value		\$115,192	
HUD Adjusted Median Family Income for 2011		\$61,800	Unemployment Rate (December 2011)		8.5%	
Households Below Poverty Level		11%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census, 2011 HUD updated MFI, and the Bureau of Labor Statistics.

Broward County is equivalent to Metropolitan Division 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL). Based on the 2000 Census, the assessment area consists of 279 census tracts (geographies) of which 13 (5%) are low-income, 71 (25%) are moderate-income, 117 (42%) are middle-income, and 78 (28%) are upper-income. For 2009, 2010, and 2011, the HUD Adjusted Median Family Income for Broward County was \$65,400, \$66,200, and \$61,800, respectively.

According to the 2000 Census the total population of Broward County is 1.6 million. The 2010 Census indicates that the population grew by about 8 percent to 1.7 million. Owner occupancy is high in the county reaching 61 percent based on the 2000 Census, however, in low-income geographies owner occupancy is only 25 percent, indicating a need for affordable rental housing.

The housing crisis is just as evident in Broward County as it is in Miami-Dade County and has had a similar impact. During the evaluation period, Realty Trac consistently listed Broward County among the top five counties in the United States having the highest level of home foreclosures. The level of mortgages with negative equity is equivalent to the level in Miami-Dade County. According to a community contact made for another examination in the same assessment area, foreclosure recovery programs are a critical need in the assessment area.

Housing prices in Broward County have declined since the beginning of 2006, generally about 50 percent. According to the 2010 Census, the median value of owner-occupied housing

(2006-2010) is \$247,500, and according to the National Association of Realtors the median sales price of an existing single-family home declined to \$166,000 in the first quarter of 2011.

As in Miami-Dade County investors are purchasing lower priced homes for cash limiting the opportunities for low- and moderate-income buyers. With subsidies and other forms of assistance, some low- and moderate-income families can afford to purchase a home in the county, but economic conditions are causing the availability of these assistance programs to decline.

The economy of the assessment area continues to be weak, suffering from the housing crisis and related job losses. The unemployment rate reached 9.5 percent in December 2009 according to the Bureau of Labor Statistics, but has declined to 8.5 percent as of December 2011, indicating some revival in the local economy. Job losses were primarily in the construction and related sectors. Tourism also experienced a decline, bottoming out in early 2009. This had a negative impact on service jobs, particularly in the restaurant industry. Healthcare continues to provide job opportunities. Tenet Healthcare is the largest employer in Broward County. Employment data shows a need for the creation of new jobs either through the creation of new businesses or the expansion of existing ones, which leads to a need for business loans. A community contact made for another examination articulated the need for small business financing, particularly for operating expenses.

Banking competition within the assessment area is high. In addition to community and mid-size banks, branches of the largest banks in the country operate in Broward County. As of June 30, 2011, there are 62 deposit taking financial institutions in Broward County operating 478 branches. CNBF has a deposit market share of 0.32 percent. The market continues to be dominated by Bank of America and Wells Fargo as discussed in the Lending Activity portion of this evaluation.

Opportunities for community development activities are good in Broward County, but are slightly more limited than in Miami-Dade County. The same factors impact community development activity in both counties. In Broward County grants from HUD's Neighborhood Stabilization Program (NSP) will total \$36.8 million of which \$17.8 million will go to Broward County and the remainder to eight individual cities. As in Miami-Dade County, opportunities exist for investments in local, state-wide, and regional CDFIs and for services directed to financial education programs.

Qualified mortgage-backed securities are an option, as in Miami-Dade County. Opportunities exist to contribute to qualified non-profit organizations whose mission meets the definition of community development. Economic development and revitalization and stabilization opportunities exist in the assessment area. There are local and state designated zones targeted for redevelopment by revitalizing the areas and/or attracting new businesses and expanding existing ones.

MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)

Demographic Information for Full Scope Area: MD 48424 (Palm Beach County, FL)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	265	5.66	26.42	33.58	33.58	0.75
Population by Geography	1,131,184	4.21	29.32	33.88	32.37	0.21
Owner-Occupied Housing by Geography	354,024	1.53	24.63	36.35	37.50	0.00
Business by Geography	167,235	3.43	21.26	34.69	40.46	0.16
Farms by Geography	3,728	4.27	23.04	35.70	36.96	0.03
Family Distribution by Income Level	306,002	19.86	18.56	20.60	40.98	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	117,575	7.08	40.85	33.45	18.62	0.00
Median Family Income HUD Adjusted Median Family Income for 2011 Households Below Poverty Level		\$53,777 \$63,300 9%	Median Housing Value Unemployment Rate (December 2011)		\$131,523 8.50%	

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census, 2011 HUD updated MFI, Bureau of Labor Statistics.

Palm Beach County is equivalent to Metropolitan Division 48424 (West Palm Beach, Boca Raton-Boynton Beach, FL).

Based on the 2000 Census, the county consists of 265 census tracts (geographies) of which 15 (6%) are low-income, 70 (26%) are moderate-income, 89 (33%) are middle-income, and 89 (33%) are upper-income. Clusters of low- and moderate-income geographies can be found in cities such as West Palm Beach, Riviera Beach, Lake Worth, and Boynton Beach along the eastern boundaries of the county, as well as inland around Lake Okeechobee in western cities such as Belle Glade and Pahokee.

The county has a population of approximately 1.1 million, based on the 2000 Census. The 2010 Census indicates that the population increased 17 percent to 1.3 million. The HUD estimated median family income for Palm Beach County in 2009 and 2010 was \$67,600 and in 2011 it was \$63,300, one of the highest in Florida. But, in communities such as Riviera Beach, Belle Glade, and Pahokee, the level of population at or below the poverty level is approximately 32 percent. For the county overall, 12.2 percent of the population (2006-2010) lives below the poverty level, according to the Census Bureau's "Quickfacts" report. These levels of poverty reduce the opportunities for mortgage lending.

Housing prices have declined significantly since the highs of 2006 and foreclosure rates are high. Reports indicate that by mid-2011, home prices declined 50 percent to a median value of approximately \$200,000 and condominium prices declined 60 percent to a median value of \$80,000. With these lower prices, some low-income families can afford to purchase homes under special programs that provide closing cost assistance and/or subsidies, but as in the

other counties discussed, the availability of funds for these programs declined and such buyers are forced to compete with investors paying cash.

The county's economy is largely based in the service and retail sectors. However, the western portion of the county has an agricultural base rooted in sugar cane. Many employment opportunities were focused on real estate construction and development and the decline in those sectors has caused the unemployment rate to rise to 11 percent at the end of 2009. By December 2011, the unemployment rate fell to 9.8 percent according to the Bureau of Labor Statistics.

Banking competition within Palm Beach County is high. In addition to community and mid-size banks, branches of the largest banks in the country operate in Palm Beach County. As of June 30, 2011, there were 55 deposit taking financial institutions in the county operating 481 branches. CNBF has a deposit market share of 0.27 percent. The market continues to be dominated by Wells Fargo and Bank of America as discussed in the Lending Activity portion of the evaluation.

Similar types of opportunities are available for community development lending, investments, and services in Palm Beach County as in Miami-Dade and Broward, but they are more limited. There are fewer community development organizations operating in the county. As noted in Miami-Dade County, opportunities exist for investments in local, state-wide, and regional CDFIs and for services directed to financial education programs.

Limited-Scope Assessment Areas

The bank has two limited-scope assessment areas. One includes all of MSA 38940 (Port St. Lucie-Fort Pierce, FL) and the other is comprised of portions of MSA 36740 (Orlando-Kissimmee, FL) including Orange and Seminole Counties. These assessment areas meet the requirements of the CRA regulation and do not arbitrarily exclude low- and moderate-income geographies. The following tables provide general demographic information about each assessment area.

MSA 38940 (St Lucie and Martin Counties)

Demographic Information for Limited Scope Area: MSA 38940 (St Lucie and Martin Counties)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	60	5.00	21.67	51.67	21.67	0.00
Population by Geography	319,426	3.58	17.57	57.55	21.31	0.00
Owner-Occupied Housing by Geography	104,166	1.15	11.40	62.21	25.24	0.00
Business by Geography	63,930	1.99	16.05	59.41	22.54	0.00
Farms by Geography	2,063	1.70	17.98	60.45	19.87	0.00
Family Distribution by Income Level	90,803	18.46	19.34	22.19	40.01	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	34,324	6.15	21.35	58.97	13.52	0.00
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below Poverty Level		45,503 59,600 10%	Median Housing Value Unemployment Rate (December, 2011)		97,335 11.23%	

(*) The NA category consists of geographies that have not been assigned an income classification. Source: 200 Census, Bureau of Labor Statistics.

MSA 36740 Partial (Orange and Seminole Counties)

Demographic Information for Limited Scope Area: MSA 36740 Partial (Orange and Seminole Counties)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	268	2.99	20.90	42.54	33.58	0.00
Population by Geography	1,261,540	2.12	20.02	43.24	34.62	0.00
Owner-Occupied Housing by Geography	301,186	0.86	14.02	43.19	41.93	0.00
Business by Geography	262,633	1.39	16.59	39.48	42.54	0.00
Farms by Geography	4,961	1.33	14.61	45.49	38.56	0.00
Family Distribution by Income Level	320,384	17.89	17.59	21.98	42.54	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	113,659	3.96	30.12	46.30	19.62	0.00
Median Family Income HUD Adjusted Median Family Income for 2010 Households Below Poverty Level		47,851 60,900 10%	Median Housing Value Unemployment Rate (December, 2011)		111,357 9.6%	

(*) The NA category consists of geographies that have not been assigned an income classification. Source: 2000 Census, Bureau of Labor Statistics.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As 12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units

throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

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

\$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)

- For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As 12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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

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

Tables of Performance Data

Institution ID: City NB of Florida (Included)

Table 1. Lending Volume

LENDING VOLUME													Geography: FLORIDA		Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011	
Assessment Area (2010):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)					
Full Review:																
MD 22744 (Ft Lauderdale-	17.40	185	52,549	119	30,358	0	0	5	11,000	309	93,907	4.32				
MD 33124 (Miami-Miami Beach	67.12	360	162,059	446	129,078	0	0	24	71,000	830	362,137	89.52				
MD 48424 (West Palm Beach Boynton)	7.44	38	18,284	41	11,556	0	0	3	10,300	82	40,140	3.59				
Limited Review:																
MSA 36740 Partial (Orange and	6.05	43	16,545	13	4,089	0	0	1	12,000	57	32,634	0.78				
MSA 38940 (St Lucie and Martin	1.76	22	4,272	2	1,050	0	0	1	4,200	25	9,522	1.83				
Outside Assessm	0.23	0	0	0	0	0	0	3	1,228	3	1,228	0.00				

* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2009 to December 31, 2011.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: City NB of Florida (Included)

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography ¹				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total ²	% Owner Occ Units ³	% BANK Loans ⁴	% Owner Occ Units ³	% BANK Loans	% Owner Occ Units ³	% BANK Loans	% Owner Occ Units ³	% BANK Loans						
Full Review:																
MD 22744 (Ft Lauderdale-Pompano Beach)	143	30.11	1.16	8.39	23.67	16.78	45.93	48.95	29.24	25.87	0.09	1.79	0.10	0.06	0.03	
MD 33124 (Miami-Miami Beach-Kendall)	237	49.89	1.69	8.86	19.82	13.50	36.99	36.71	41.51	40.93	0.12	0.40	0.24	0.06	0.08	
MD 48424 (West Palm Beach-Boca-Boynton Beach)	34	7.16	1.53	11.76	24.63	35.29	36.35	14.71	37.50	38.24	0.01	0.00	0.00	0.00	0.01	
Limited Review:																
MSA 36740 Partial (Orange and Seminole Counties)	43	9.05	0.86	0.00	14.02	4.65	43.19	37.21	41.93	58.14	0.00	0.00	0.00	0.00	0.00	
MSA 38940 (St Lucie and Martin Counties)	18	3.79	1.15	0.00	11.40	66.67	62.21	22.22	25.24	11.11	0.00	0.00	0.00	0.00	0.00	

¹ Based on 2010 Peer Mortgage Data (Eastern)

² Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

³ Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

⁴ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: City NB of Florida (Included)

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011						Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
MD 22744 (Ft Lauderdale-Pompano Beach)	0	0.00	1.16	0.00	23.67	0.00	45.93	0.00	29.24	0.00	0.12	0.00	0.55	0.00	0.00	
MD 33124 (Miami-Miami Beach-Kendall)	7	77.78	1.69	0.00	19.82	0.00	36.99	57.14	41.51	42.86	0.23	2.50	0.21	0.12	0.26	
MD 48424 (West Palm Beach-Boca-Boynton Beach)	0	0.00	1.53	0.00	24.63	0.00	36.35	0.00	37.50	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
MSA 36740 Partial (Orange and Seminole Counties)	0	0.00	0.86	0.00	14.02	0.00	43.19	0.00	41.93	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 38940 (St Lucie and Martin Counties)	2	22.22	1.15	0.00	11.40	0.00	62.21	100.00	25.24	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 Peer Mortgage Data (Eastern)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: City NB of Florida (Included)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]													
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans ^{****}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp							
Full Review:																								
MD 22744 (Ft Lauderdale-Pompano Beach)	41	25.47	1.16	2.44	23.67	2.44	45.93	36.59	29.24	58.54	0.03	0.00	0.02	0.01	0.04									
MD 33124 (Miami-Miami Beach-Kendall)	114	70.81	1.69	0.00	19.82	7.02	36.99	23.68	41.51	69.30	0.02	0.00	0.00	0.02	0.04									
MD 48424 (West Palm Beach-Boca-Boynton Beach)	4	2.48	1.53	0.00	24.63	0.00	36.35	0.00	37.50	100.00	0.00	0.00	0.00	0.00	0.00									
Limited Review:																								
MSA 36740 Partial (Orange and Seminole Counties)	0	0.00	0.86	0.00	14.02	0.00	43.19	0.00	41.93	0.00	0.00	0.00	0.00	0.00	0.00									
MSA 38940 (St Lucie and Martin Counties)	2	1.24	1.15	0.00	11.40	0.00	62.21	100.00	25.24	0.00	0.00	0.00	0.00	0.00	0.00									

^{*} Based on 2010 Peer Mortgage Data (Eastern)

^{**} Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

^{****} Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: City NB of Florida (Included)

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans					
Full Review:															
MD 22744 (Ft Lauderdale-Pompano Beach)	1	50.00	2.27	0.00	32.48	100.00	48.64	0.00	16.61	0.00	0.00	0.00	0.00	0.00	0.00
MD 33124 (Miami-Miami Beach-Kendall)	1	50.00	6.85	0.00	35.49	0.00	30.24	100.00	27.42	0.00	0.00	0.00	0.00	0.00	0.00
MD 48424 (West Palm Beach-Boca-Boynton Beach)	0	0.00	3.13	0.00	32.78	0.00	31.51	0.00	32.58	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
MSA 36740 Partial (Orange and Seminole Counties)	0	0.00	2.73	0.00	27.37	0.00	50.42	0.00	19.47	0.00	0.00	0.00	0.00	0.00	0.00
MSA 38940 (St Lucie and Martin Counties)	0	0.00	2.19	0.00	14.37	0.00	43.56	0.00	39.88	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2010 Peer Mortgage Data (Eastern)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: City NB of Florida (Included)

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	% of Businessess***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
Full Review:																								
MD 22744 (Ft Lauderdale-Pompano Beach)	119	19.22	4.01	7.56	19.65	17.65	41.33	44.54	35.01	30.25	0.13	0.33	0.11	0.18	0.07									
MD 33124 (Miami-Miami Beach-Kendall)	445	71.89	3.98	8.76	19.56	21.57	32.37	25.84	43.51	43.82	0.29	0.64	0.38	0.22	0.30									
MD 48424 (West Palm Beach-Boca-Boynton Beach)	40	6.46	2.78	0.00	19.29	20.00	34.19	22.50	43.62	57.50	0.03	0.00	0.05	0.01	0.04									
Limited Review:																								
MSA 36740 Partial (Orange and Seminole Counties)	13	2.10	1.39	0.00	16.59	30.77	39.48	46.15	42.54	23.08	0.01	0.00	0.00	0.01	0.01									
MSA 38940 (St Lucie and Martin Counties)	2	0.32	1.99	0.00	16.05	50.00	59.41	50.00	22.54	0.00	0.00	0.00	0.00	0.00	0.00									

* Based on 2010 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2011).

Institution ID: City NB of Florida (Included)

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					Market Share [*]				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families [*] **	% BANK Loans****	% Families ¹	% BANK Loans****	% Families ^{***}	% BANK Loans****	% Families****	% BANK Loans****						
Full Review:																
MD 22744 (Ft Lauderdale-Pompano Beach)	143	30.04	20.85	11.19	18.17	33.58	20.48	25.37	40.50	29.85	0.12	0.34	0.42	0.07	0.03	
MD 33124 (Miami-Miami Beach-Kendall)	238	50.00	23.00	3.83	16.98	18.18	18.53	19.62	41.50	58.37	0.13	0.88	0.63	0.33	0.06	
MD 48424 (West Palm Beach-Boca-Boynton Beach)	34	7.14	19.86	11.76	18.56	23.53	20.60	11.76	40.98	52.94	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
MSA 36740 Partial (Orange and Seminole Counties)	43	9.03	17.89	0.00	17.59	4.76	21.98	9.52	42.54	85.71	0.00	0.00	0.00	0.00	0.00	
MSA 38940 (St Lucie and Martin Counties)	18	3.78	18.46	11.76	19.34	23.53	22.19	29.41	40.01	35.29	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2010 Peer Mortgage Data (Eastern)

^{**} Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 8.4% of loans originated and purchased by bank.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: City NB of Florida (Included)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011					Market Share*				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families ²	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
MD 22744 (Ft Lauderdale-Pompano Beach)	0	0.00	20.85	0.00	18.17	0.00	20.48	0.00	40.50	0.00	0.00	0.00	0.00	0.00	0.00	
MD 33124 (Miami-Miami Beach-Kendall)	7	77.78	23.00	0.00	16.98	0.00	18.53	16.67	41.50	83.33	0.17	0.63	0.00	0.00	0.18	
MD 48424 (West Palm Beach-Boca-Boynton Beach)	0	0.00	19.86	0.00	18.56	0.00	20.60	0.00	40.98	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
MSA 36740 Partial (Orange and Seminole Counties)	0	0.00	17.89	0.00	17.59	0.00	21.98	0.00	42.54	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 38940 (St Lucie and Martin Counties)	2	22.22	18.46	50.00	19.34	0.00	22.19	0.00	40.01	50.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2010 Peer Mortgage Data (Eastern)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 11.1% of loans originated and purchased by bank.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: City NB of Florida (Included)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ¹													
	#	% of Total ²	% Families ³	% BANK Loans ⁴	% Families ³	% BANK Loans ⁴	% Families ³	% BANK Loans ⁴	% Families ³	% BANK Loans ⁴	% Families ³	% BANK Loans ⁴	Overall	Low	Mod	Mid	Upp							
Full Review:																								
MD 22744 (Ft Lauderdale-Pompano Beach)	41	25.47	20.85	2.44	18.17	7.32	20.48	21.95	40.50	68.29	0.02	0.00	0.00	0.00	0.04									
MD 33124 (Miami-Miami Beach-Kendall)	114	70.81	23.00	0.98	16.98	1.96	18.53	9.80	41.50	87.25	0.03	0.00	0.05	0.00	0.03									
MD 48424 (West Palm Beach-Boca-Boynton Beach)	4	2.48	19.86	0.00	18.56	0.00	20.60	0.00	40.98	100.00	0.00	0.00	0.00	0.00	0.00									
Limited Review:																								
MSA 36740 Partial (Orange and Seminole Counties)	0	0.00	17.89	0.00	17.59	0.00	21.98	0.00	42.54	0.00	0.00	0.00	0.00	0.00	0.00									
MSA 38940 (St Lucie and Martin Counties)	2	1.24	18.46	0.00	19.34	0.00	22.19	0.00	40.01	100.00	0.00	0.00	0.00	0.00	0.00									

¹ Based on 2010 Peer Mortgage Data (Eastern)

² Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

³ Percentage of Families is based on the 2000 Census information.

⁴ As a percentage of loans with borrower income information available. No information was available for 7.5% of loans originated and purchased by bank.

⁵ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: City NB of Florida (Included)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: FLORIDA					Evaluation Period: JANUARY 1, 2009 TO DECEMBER 31, 2011				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
MD 22744 (Ft Lauderdale-Pompano Beach)	119	19.16	70.49	65.55	42.86	25.21	31.93	0.13	0.27
MD 33124 (Miami-Miami Beach-Kendall)	446	71.82	69.18	41.93	40.13	24.22	35.65	0.29	0.49
MD 48424 (West Palm Beach-Boca-Boynton Beach)	41	6.60	70.34	58.54	41.46	21.95	36.59	0.03	0.11
Limited Review:									
MSA 36740 Partial (Orange and Seminole Counties)	13	2.09	70.05	61.54	53.85	0.00	46.15	0.01	0.02
MSA 38940 (St Lucie and Martin Counties)	2	0.32	72.16	100.00	50.00	0.00	50.00	0.00	0.00

* Based on 2010 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.32% of small loans to businesses originated and purchased by the bank.

Institution ID: City NB of Florida (Included)

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: FLORIDA		Evaluation Period: MAY 18, 2009 TO MAY 29, 2012					
Assessment Area:	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Statewide	1	36	0	0	1	36	0.10	0	0
MSA 33110	0	0	1	5,000	1	5,000	14.35	0	0
MD 22744 (Ft Lauderdale-Pompano Beach)	0	0	17	26	17	26	0.07	0	0
MD 33124 (Miami-Miami Beach-Kendall)	0	0	86	28,054	86	28,054	80.53	0	0
MD 48424 (West Palm Beach-Boca-Boynton Beach)	0	0	8	13	8	13	0.04	0	0
Limited Review:									
MSA 36740 Partial (Orange and Seminole Counties)	0	0	3	1,702	3	1,702	4.89	0	0
MSA 38940 (St Lucie and Martin Counties)	0	0	8	7	8	7	0.02	0	0

^{*} 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

^{**} 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: City NB of Florida (Included)

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: FLORIDA																	
Evaluation Period: MAY 18, 2009 TO MAY 29, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
MD 22744 (FtLauderdale-Pompano Beach)	4.32	5	19.00	20.00	20.00	40.00	20.00	3	0	0	+1	+1	+1	3.57	26.43	43.13	26.88
MD 33124 (Miami-Miami Beach-Kendall)	89.52	15	58.00	20.00	13.00	33.00	33.00	2	0	0	0	+1	+1	4.89	28.61	35.68	30.79
MD 48424 (West Palm Beach-Boca-Boynton Beach)	3.59	3	11.00	0.00	33.00	0.00	67.00	0	0	0	0	0	0	4.21	29.32	33.88	32.37
Limited Review:																	
MSA 36740 Partial (Orange and Seminole Counties)	0.78	2	8.00	0.00	100.00	0.00	0.00	1	0	0	+1	0	0	2.12	20.02	43.24	34.62
MSA 38940 (St Lucie and Martin Counties)	1.83	1	4.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	3.58	17.57	57.55	21.31

Institution ID: City NB of Florida (Included)

MD 22744 (Ft lauderdale-Pompano Beach)

Demographic Information for Full Scope Area: MD 22744 (Ft lauderdale-Pompano Beach)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	279	4.66	25.45	41.94	27.96	0.00
Population by Geography	1,623,018	3.57	26.43	43.13	26.88	0.00
Owner-Occupied Housing by Geography	454,625	1.16	23.67	45.93	29.24	0.00
Business by Geography	344,625	4.01	19.65	41.33	35.01	0.00
Farms by Geography	4,366	3.30	21.23	42.51	32.96	0.00
Family Distribution by Income Level	413,958	20.85	18.17	20.48	40.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	161,511	5.81	38.36	42.71	13.12	0.00
Median Family Income		50,570	Median Housing Value		115,192	
HUD Adjusted Median Family Income for 2010		66,200	Unemployment Rate (2000 US		2.64%	
Households Below Poverty Level		11%	Census)			

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2010 HUD updated MFI

Institution ID: City NB of Florida (Included)

MSA 38940 (St Lucie and Martin Counties)

Demographic Information for Limited Scope Area: MSA 38940 (St Lucie and Martin Counties)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	60	5.00	21.67	51.67	21.67	0.00
Population by Geography	319,426	3.58	17.57	57.55	21.31	0.00
Owner-Occupied Housing by Geography	104,166	1.15	11.40	62.21	25.24	0.00
Business by Geography	63,930	1.99	16.05	59.41	22.54	0.00
Farms by Geography	2,063	1.70	17.98	60.45	19.87	0.00
Family Distribution by Income Level	90,803	18.46	19.34	22.19	40.01	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	34,324	6.15	21.35	58.97	13.52	0.00
Median Family Income		45,503	Median Housing Value		97,335	
HUD Adjusted Median Family Income for 2010		59,600	Unemployment Rate (2000 US Census)		2.03%	
Households Below Poverty Level		10%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2010 HUD updated MFI

Institution ID: City NB of Florida (Included)

MSA 36740 Partial (Orange and Seminole Counties)

Demographic Information for Limited Scope Area: MSA 36740 Partial (Orange and Seminole Counties)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	268	2.99	20.90	42.54	33.58	0.00
Population by Geography	1,261,540	2.12	20.02	43.24	34.62	0.00
Owner-Occupied Housing by Geography	301,186	0.86	14.02	43.19	41.93	0.00
Business by Geography	262,633	1.39	16.59	39.48	42.54	0.00
Farms by Geography	4,961	1.33	14.61	45.49	38.56	0.00
Family Distribution by Income Level	320,384	17.89	17.59	21.98	42.54	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	113,659	3.96	30.12	46.30	19.62	0.00
Median Family Income		47,851	Median Housing Value		111,357	
HUD Adjusted Median Family Income for 2010		60,900	Unemployment Rate (2000 US Census)		2.46%	
Households Below Poverty Level		10%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2010 HUD updated MFI

Institution ID: City NB of Florida (Included)

MD 48424 (West Palm Beach-Boca-Boynton Beach)

Demographic Information for Full Scope Area: MD 48424 (West Palm Beach-Boca-Boynton Beach)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	265	5.66	26.42	33.58	33.58	0.75
Population by Geography	1,131,184	4.21	29.32	33.88	32.37	0.21
Owner-Occupied Housing by Geography	354,024	1.53	24.63	36.35	37.50	0.00
Business by Geography	257,029	2.78	19.29	34.19	43.62	0.12
Farms by Geography	4,792	2.82	23.02	34.77	39.38	0.02
Family Distribution by Income Level	306,002	19.86	18.56	20.60	40.98	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	117,575	7.08	40.85	33.45	18.62	0.00
Median Family Income		53,777	Median Housing Value		131,523	
HUD Adjusted Median Family Income for 2010		67,600	Unemployment Rate (2000 US Census)		2.24%	
Households Below Poverty Level		9%				

(* The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2010 HUD updated MFI

Institution ID: City NB of Florida (Included)

MD 33124 (Miami-Miami Beach-Kendall)

Demographic Information for Full Scope Area: MD 33124 (Miami-Miami Beach-Kendall)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	347	7.78	28.53	32.85	29.97	0.86
Population by Geography	2,253,362	4.89	28.61	35.68	30.79	0.02
Owner-Occupied Housing by Geography	449,333	1.69	19.82	36.99	41.51	0.00
Business by Geography	454,418	3.98	19.56	32.37	43.51	0.59
Farms by Geography	5,069	2.39	18.13	35.10	44.19	0.20
Family Distribution by Income Level	552,484	23.00	16.98	18.53	41.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	220,856	8.31	40.20	35.41	16.08	0.00
Median Family Income		40,266	Median Housing Value		123,974	
HUD Adjusted Median Family Income for 2010		52,200	Unemployment Rate (2000 US Census)		3.92%	
Households Below Poverty Level		18%				

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2010 HUD updated MFI