



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## Public Disclosure

October 16, 2002

### Community Reinvestment Act Performance Evaluation

SunTrust BankCard, National Association  
Charter Number: 22626  
7455 Chancellor Drive  
Orlando, FL 32809

Office of the Comptroller of the Currency  
ADC- Credit Card Bank Supervision  
Marquis One Tower, Suite 600  
245 Peachtree Center Avenue, NE  
Atlanta, GA 30303

**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.

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## Overall CRA Rating

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

The following table indicates the performance level of **SunTrust Bankcard, National Association (STBC)** with respect to the Lending, Investment, and Service Tests:

*[Indicate the performance level under each criterion by marking an “X” in the appropriate row.]*

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- STBC demonstrated adequate responsiveness to credit needs in its assessment area, taking into account the number and amount of community development and small loans to businesses.
- STBC has an excellent record of serving the credit needs of businesses with gross annual revenues of \$1 million or less. Seventy-four percent of the bank’s loans were made to such businesses, compared to 63% of the businesses in the assessment area being this size.
- The geographic distribution of small loans to businesses is adequate with the percentage of loans to businesses in low-income geographies equal to the percentage of low-income geographies in its assessment area.
- STBC demonstrates a significant level of qualified investments, with a total amount for the evaluation period of \$2.5 million.
- STBC demonstrates reasonably accessible delivery systems to geographies of different income levels.

## 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 MA/assessment area.

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**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 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.

**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 household and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

**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 primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

**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) and the Thrift Financial Reporting (TFR) instructions. 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

## Description of Institution

SunTrust BankCard, National Association (STBC) is located in Orlando, Florida. As of September 30, 2002, total assets were approximately \$169 million. Net loans represented 66% of total assets. The loan portfolio consisted of 1% residential real estate loans, 96% commercial loans or business credit cards, and 3% individual loans or consumer credit cards. Tier 1 capital was \$30 million. The bank does not offer deposit accounts to the general public.

STBC has only one office and its business focus is the issuance of credit cards to business customers of its affiliate, SunTrust Bank, headquartered in Atlanta, Georgia. STBC does not have any subsidiaries.

STBC was last evaluated for CRA as of May 3, 1996 as a limited purpose bank. It was assigned a rating of satisfactory. Effective May 2001, the bank relinquished its limited purpose designation for CRA. There has been no merger and acquisition activity during the evaluation period. During the evaluation period STBC discontinued its consumer credit card products. As of September 2002, it was only offering credit cards to businesses.

STBC is a subsidiary of SunTrust Banks, Inc. (STI), headquartered in Atlanta, Georgia. STI is a financial services company that provides deposit, credit, trust, investment, and mortgage banking services through various subsidiaries. As of December 31, 2001, it operated 1,100 retail branches and 1,990 automated teller machines in Alabama, Florida, Georgia, Maryland, Tennessee, Virginia and the District of Columbia. It had total assets of approximately \$105 billion.

There are no legal, financial or other factors that impede STBC's ability to help meet the credit needs in its assessment area.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The evaluation period was June 1, 1996 through October 16, 2002. For the Lending Test, we provided and reviewed business credit card loans originating from January 1, 2001 through June 30, 2002 and community development loans originated from June 1, 1996 through June 30, 2002. For the investment test we considered investment securities, investment in a community development corporation, and charitable donations made from June 1, 1996 through October 16, 2002. For the Service Test, we considered services rendered from June 1, 1996 through October 16, 2002.

### **Data Integrity**

Data used in the evaluation was verified by comparing a sample to the source documents (loan files, investment and services information files). We determined that the data was accurate.

### **Selection of Areas for Full-Scope Review**

The bank has only one assessment area, Orange County, Florida. Orange County is located within the Orlando, Florida Metropolitan Statistical Area (MSA). The assessment area consists of 124 census tracts, including 6 low-income, 24 moderate-income, 64 middle-income, 29 upper-income, and one tract with no income designation. These census tract designations are based on 1990 Bureau of Census data.

### **Other**

Community development and credit needs in Orange County are primarily affordable housing and funding for small businesses. Farming is not a major industry within the county.

For purposes of CRA, most loans made by STBC outside of its assessment area, Orange County, Florida, are considered for CRA credit in the evaluation of its affiliate, SunTrust Bank.

## **Fair Lending Review**

We found no evidence of illegal discrimination or other illegal credit practices.

## Conclusions with Respect to Performance Tests

### LENDING TEST

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

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

During the evaluation period STBC demonstrated adequate responsiveness to credit needs in its assessment area, taking into account the number and amount of community development and small loans to businesses in its assessment area. A very small percentage of its loans are made in its assessment area. The geographic distribution is adequate. The bank has an excellent record of serving the credit needs of businesses with gross annual revenues of \$1 million or less, consistent with safe and sound operations. It has made no use of innovative or flexible lending practices.

#### Lending Activity

Refer to Table 1, Lending Volume, in appendix C for the facts and data used to evaluate the bank's lending activity.

STBC's lending activity includes business credit cards that provide loans to small businesses and affordable housing loans in the form of multi-family housing for low- and moderate-income families. Both help to meet the credit needs in the bank's assessment area.

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

##### *Home Mortgage Loans*

Refer to Table 5 in appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

During the evaluation period, STBC purchased participations in a minimal number of multi-family housing loans. As a policy, it did not originate home mortgage loans. Therefore a geographical analysis of multifamily loans is not meaningful.

##### *Small Loans to Businesses*

Refer to Table 6 in 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 geographic distribution of small loans to businesses is adequate, with the percentage of loans to businesses in low-income geographies equal to the percentage of low-income geographies. The percentage of loans to businesses in moderate-income geographies is about half the percentage of businesses in moderate-income geographies.

## **Lending Gap Analysis**

A lending gap analysis was performed by plotting tracts on a map of the assessment area. There were no unexplained conspicuous gaps.

### ***Inside/Outside Ratio***

A very small percentage of STBC's loans are made in its assessment area. During the evaluation period, the bank made 5% of its loans in its assessment area. The inside/outside ratio analysis was performed at the bank level as opposed to the assessment area level. The analysis includes loans made in the assessment area compared to all loans made by the bank during the evaluation period, including loans allocated to the affiliate for CRA purposes.

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

### ***Small Loans to Businesses***

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

Seventy-four percent of the bank's loans were made to businesses with revenues of \$1 million or less, compared to 63% of the businesses in the assessment area of this size.

## **Community Development Lending**

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

All of the multi-family loans purchased by STBC during the evaluation period were made to provide affordable housing to low- and to moderate-income families. Considering its resources, STBC purchased an adequate level of community development loans.

## **Product Innovation and Flexibility**

The bank does not offer any innovative or flexible products.

## **INVESTMENT TEST**

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

The bank's performance under the investment test is rated "high satisfactory".

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

STBC demonstrates a significant level of qualified investments. Private investors routinely provide all of the investments and it rarely takes a leadership position. It demonstrates good responsiveness to community credit needs. The bank's qualified investments during the evaluation period total \$2,501,000 and were for the purpose of affordable housing, credit counseling, and community services.

Significant investments made during the evaluation period include:

- \$500 thousand in securities backed by mortgages to low- or moderate-income borrowers, with 26% of the loans in the pool made for properties located in the bank's assessment area.
- \$2 million equity investment in a community development corporation. The investment was used to fund affordable housing in the bank's assessment area, through the purchase of federal low-income housing tax credits. The property is a 262-unit apartment building.

## **SERVICE TEST**

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

The bank's performance under the Service Test is rated "low satisfactory".

STBC demonstrates reasonably accessible delivery systems to geographies of different income levels in its assessment area. No significant change has been made in its office location. Its services do not vary in a way that inconveniences any geographies. It provides an adequate level of community development services.

### **Retail Banking Services**

The bank's office is located in a middle-income census tract in an industrial area. It is not opened to the public. STBC delivers its services through branches of an affiliate bank. Applications for its credit cards are accepted through offices of its affiliate, SunTrust Bank. As of June 30, 2002, SunTrust Bank had 30 offices in Orange County, distributed as follows: 7% in low income census tracts, none in moderate, 67% in middle, 23% in upper, and 3% in a non-designated tract. Branches in other tracts are reasonably accessible for businesses in the moderate-income tracts.

### **Community Development Services**

During the evaluation period the bank provided qualified services to six organizations that provide financial literacy training, affordable housing, credit counseling, and community services primarily for low-and moderate-income individuals.

## Appendix A: Scope of Examination

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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 non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): (01/01/2001 to 06/30/02) Investment and Service Tests and CD Loans: (06/01/96 to 10/16/02)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
SunTrust BankCard, National Association Orlando, FL	- Multi-family residential real estate loans. - Small business loans.	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Orange County, FL (part of the Orlando, FL MSA)	Full-Scope	

# Appendix B: Market Profiles for Full-Scope Areas

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

Orange County, FL.....	B-2
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**Orange County, FL**

Demographic Information for Full-Scope Area: Orange County, FL						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	124	5%	19%	52%	23%	1%
Population by Geography	677,491	3%	16%	59%	21%	1%
Owner-Occupied Housing by Geography	151,225	1%	12%	60%	27%	0%
Businesses by Geography	42,697	5%	15%	58%	22%	<1%
Farms by Geography	1,316	1%	18%	56%	25%	0%
Family Distribution by Income Level	172,598	18%	19%	24%	39%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	63,798	5%	23%	60%	12%	0%
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		\$36,213 \$54,700 10%		Median Housing Value Unemployment Rate (1990 US Census)		\$85,669 2.60%

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 1990 U.S. Census, and 2002 HUD updated MFI.

SunTrust BankCard, NA has one assessment area – Orange County, FL. Orange County is a part of the Orlando, FL MSA. There is no similar bank operating in the area. The bank only has one office and does not own any ATMs. Its primary business focus is business credit cards. The major industry is tourism, which was estimated to comprise 31% of the county’s total employment in 2002. There are numerous community development opportunities, mainly in the area of affordable housing.

## Appendix C: Tables of Performance Data

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### 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: 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. 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. Refer to Interagency Q&As \_\_.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- 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. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

**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.







**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: Orange County, FL		Evaluation Period: January 1, 2001 TO June 30, 2002		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
<b>Full Review:</b>									
Orange County, FL	704	100%	63%	74%	701	3	0	1%	2%
<b>Limited Review:</b>									

\* Based on 2001 Peer Small Business Data: US.

\*\* 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 - 2001).

\*\*\*\* 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 [Percentage] of small loans to businesses originated and purchased by the Bank.

# Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: Orange County, FL Evaluation Period: June 1, 1996 TO October 16, 2002									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Orange County, FL	0	0	5	\$2,501	5	\$2,501	100%	0	0
<b>Limited Review:</b>									

\* 'Prior Period Investments' means investments made in a previous evaluation 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.

