

PUBLIC DISCLOSURE

August 20, 2007

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**TIB Bank
Certificate Number: 21435**

**99451 Overseas Highway
Key Largo, Florida 33037-7808**

**Federal Deposit Insurance Corporation
10 Tenth Street, Suite 800
Atlanta, Georgia 30309-3906**

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, nor should it 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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INSTITUTION'S CRA RATING

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

The following table indicates the performance level of TIB Bank with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	TIB Bank		
	PERFORMANCE TESTS		
	Lending Test	Investment Test	Service Test
Outstanding			
High Satisfactory		X	X
Low Satisfactory	X		
Needs to Improve			
Substantial Noncompliance			

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

Lending Test: The lending test is rated low satisfactory for the following reasons:

- A majority of loans were originated inside the assessment area.
- Lending levels reflect a satisfactory responsiveness to the assessment areas' credit needs.
- The distribution of HMDA loans to borrowers of different incomes is poor.
- The distribution of small business loans by business size is good.
- The geographic distribution of HMDA and small business loans reflects adequate penetration throughout the assessment areas.
- The bank has originated a satisfactory level of community development loans.
- The bank makes adequate use of innovative and/or flexible lending practices.

Investment Test: The investment test is rated high satisfactory for the following reasons:

- The bank has a significant level of qualified community development investments and grants.
- The bank exhibits good responsiveness to the credit and community economic development needs of the assessment areas.
- The bank has not used innovative and/or complex investments to support community development initiatives.

Service Test: The service test is rated high satisfactory for the following reasons:

- The bank's delivery systems are reasonably accessible to essentially all portions of the assessment areas.
- The opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income areas or to low- and moderate-income individuals.
- Services do not vary in a way that would inconvenience certain portions of the assessment areas.
- The institution provides a relatively high level of community development services

DESCRIPTION OF INSTITUTION

TIB Bank (TIB) is a \$1.3 billion state-chartered commercial bank headquartered in Key Largo, Florida. It is a wholly owned subsidiary of TIB Financial Corporation, a two-bank holding company headquartered in Naples, Florida. As of June 30, 2007, the holding company reported total assets of \$1.4 billion. The other bank subsidiary, The Bank of Venice, operates in Venice, Florida.

As of the evaluation date, the bank operates from 17 locations, 9 within Monroe County, 2 within Miami-Dade County, 3 within Collier County, 2 within Lee County, and 1 within Highlands County. The bank has opened one full-service branch in Fort Myers, Naples, and Sebring, Florida, since the previous evaluation dated July 14, 2004. TIB has 11 (65 percent) branches in upper-income geographies and 6 (35 percent) branches in middle-income geographies.

TIB offers a full range of consumer and business loan and deposit products and services. The bank faces competition from numerous banks, credit unions, and non-bank lenders in its assessment areas. As of June 30, 2007, TIB's loans totaled approximately \$1 billion representing 81 percent of total assets. The loan portfolio composition as of June 30, 2007, is presented in Table 1.

Table 1 – Loan Distribution as of June 30, 2007		
Loan Type	Dollar Amount (000s)	Percent of Total Loans (%)
Construction and Land Development	148	14.3
Secured by Farmland	9	0.9
1-4 Family Residential	163	15.8
Multi-Family (5 or more) Residential	17	1.6
Non-farm Non-residential Real Estate	485	47.0
Total Real Estate Loans	822	79.6
Commercial and Industrial	68	6.6
Agricultural	0	0.0
Consumer	141	13.6
Other loans (Less unearned income)	2	0.2
Total Loans	1,033	100.0

Source: June 30, 2007, Consolidated Report of Condition and Income.

As shown in the previous table, business and 1-4 family residential loans comprise the highest percentages of the loan portfolio at 53.6 and 15.8 percent, respectively. Business loans, for the

purposes of this evaluation, consist of commercial and industrial and non-farm, non-residential real estate loans. The majority of the bank's home mortgage loans are sold on the secondary market.

The bank's loan-to-deposit ratio is more than reasonable. The bank's average loan-to-deposit ratio based on the last 12 quarters since the last CRA evaluation is 96 percent. As of June 30, 2007, the bank's loan-to-deposit ratio was 103 percent. This calculated figure uses net loans and leases, which excludes loan loss reserves and unearned income, divided by total deposits. As of the evaluation date, the high loan-to-deposit ratio is not considered an impediment to future loan opportunities. Only one impediment exists that would hinder TIB's capacity or ability to lend to, invest in, or serve its communities in accordance with the CRA. The Florida Keys has a building restriction that limits land opportunities for the Monroe County area. With that one exception, the institution provides for the credit needs of its community in a manner consistent with its size, financial capacity, location, resources, and local economic conditions.

The FDIC determined the bank's CRA performance to be satisfactory at the previous evaluation conducted July 14, 2004, using large bank examination procedures.

SCOPE OF EVALUATION

The bank's performance in the Non-MSA assessment area (Monroe County only), Naples, FL MSA, and Fort Myers, FL MSA assessment areas received a full-scope review. The bank's performance in the Miami, FL MSA received a limited-scope review due to the limited amount of loan activity. The performance in the Highland County, FL Non-MSA assessment area was excluded from the evaluation due to the bank's recent entry (4th quarter 2006) into that market. The following table details the bank's branch office locations and lending activity by assessment area. Lending activity includes all HMDA and CRA loans reported by the bank from January 1, 2005, through December 31, 2006.

Assessment Area	Number of Branches	Number of Loans	Percent	\$ (000)	Percent
Non-MSA Assessment Areas	10	729	51	184,857	47
Naples, FL MSA	3	433	30	139,619	36
Fort Myers, FL MSA	2	224	15	59,418	15
Miami, FL MSA	2	57	4	7,941	2
Total	17	1,443	100	391,835	100

The lending activity noted above was used to determine the relative weight each assessment area was given in arriving at the overall CRA rating. Accordingly, the Non-MSA Assessment Area's performance was weighted more heavily than the other assessment areas.

DESCRIPTION OF ASSESSMENT AREAS

The bank has five assessment areas. The assessment areas consist of whole geographies, and do not arbitrarily exclude any low- and moderate-income areas. The bank has properly defined its assessment areas in accordance with the technical requirements of the CRA regulation. Two of these assessment areas are on Florida's west coast and are contiguous. The west coast assessment areas include the Naples, FL and a portion of the Fort Myers, FL Metropolitan Statistical Areas (MSAs). Two other assessment areas are on the east coast, and the last assessment area is in central Florida. The east coast assessment areas include a portion of the Miami-Dade, FL MSA and portions of Monroe County, which is in a Non-Metropolitan Statistical Area.

Monroe County Non-MSA Assessment Area

The Monroe County assessment area (Non-MSA area) consists of 25 census tracts in Monroe County. This includes 7 middle-income and 18 upper-income census tracts. The three largest cities in Monroe County are Key West, Marathon, and Islamorada. According to the 2000 U.S. Census, the total population of the assessment area was 79,529. There are nine branches within the Non-MSA area. TIB's nine Monroe County offices are identified by the following mile marker (MM) numbers: Key Largo Bayside - MM 103.3, Key Largo (main office) - MM 99.5, Tavernier - MM 92, Islamorada - MM 80.5, Marathon Shores - MM 52.8, Marathon - MM 48.4, Big Pine Key - MM 30.4, Searstown Key West - MM 2.5, and Downtown Key West - MM 0. Eight of the branches are located in upper-income census tracts and one is located in a middle-income census tract. All nine branches are full service branches equipped with Automated Teller Machines (ATMs). Further, the bank has four stand-alone ATMs located in the City of Key West, Florida. There are no low- or moderate-income census tracts in the Non-MSA area. The Non-MSA area is the bank's largest assessment area in terms of lending activity.

As provided by the Department of Housing and Urban Development (HUD), the 2000 Median Family Income (MFI) for the Non-MSA area is \$37,448. The estimated MFI for the MSA changed from \$42,250 in 2005 to \$44,100 in 2006. An estimated 1,403 or approximately 6.8 percent of all families in the assessment area live below the poverty level, and 1.9 percent of all households receive some form of public assistance. The households with MFIs below the poverty level would generally not qualify for a home loan or support a monthly payment at the median housing value of \$226,398 or a median gross rent at \$816.

D&B's (formerly Dun and Bradstreet) June 2006 data reported that 63.6 percent of businesses within the assessment area have gross annual revenues of less than \$1 million. The service sector, at 54 percent, is the largest industry of employment for Monroe County. The largest employers in the county are the Monroe County government, HMA (hospital), and the Monroe County Sheriff's Office. There are 8 financial institutions located in the county. Monroe County's unemployment rate for July 2007 was 3.4 percent. Total housing permits are stagnant based on the lack of available land to develop. These demographics reflect that the economy is strong in Monroe County; however, low- and moderate-income families generally cannot afford to live there.

Naples, Florida, MSA Assessment Area

The Naples, FL MSA (Naples MSA) assessment area consists of all 52 census tracts in Collier County. This includes 4 low-income, 9 moderate-income, 23 middle-income, and 16 upper-income census tracts. The three largest cities in Collier County are Naples, Marco Island, and Everglades City. According to the 2000 U.S. Census, the total population of the assessment area was 251,377. This population is comprised of 71,823 families, of which 7.4 percent reside in low-income, 18.9 percent in moderate-income, 45.2 percent in middle-income, and 28.5 percent in upper-income census tracts. The bank operates 3 branch offices (2 with an ATM) in Collier County. The Naples MSA is the bank's second largest assessment area in terms of lending activity.

As provided by the Department of Housing and Urban Development (HUD), the 2000 Median Family Income (MFI) for the Naples MSA is \$54,531. The estimated MFI for the MSA changed from \$63,200 in 2005 to \$66,100 in 2006. An estimated 4,772 or approximately 6.6 percent of all families in the assessment area live below the poverty level, and 1.2 percent of all households receive some form of public assistance. The households with MFIs below the poverty level would generally not qualify for a home loan or support a monthly payment at the median home value of \$180,934 or a median gross rent of \$794.

D&B's 2006 data reports that 64.8 percent of businesses within the assessment area have gross annual revenues of less than \$1 million. The service sector, at 36 percent, is the largest sector of employment for Collier County. The largest employers in Collier County are NCH Healthcare System, Ritz-Carlton Hotel, and Registry Resort (Hotels). Collier County's unemployment rate for July 2007 was 4.9 percent. Unemployment figures as of July 2007 indicate that the Naples MSA is experiencing higher unemployment levels (4.9 percent) than the State of Florida (4.2 percent).

Fort Myers, Florida, MSA Assessment Area

The Fort Myers, FL MSA (Fort Myers MSA) assessment area consists of 56 census tracts in Lee County. This includes 2 low-income, 15 moderate-income, 30 middle-income, and 9 upper-income census tracts. The largest cities in Lee County are Fort Myers and Cape Coral. According to the 2000 U.S. Census, the total population of the assessment area was 206,204. This population is comprised of 56,794 families, of which 3.7 percent reside in low-income, 24.1 percent in moderate-income, 54.5 percent in middle-income, and 17.7 percent in upper-income census tracts. The bank operates 2 branch offices (1 with an ATM) in Lee County. The Fort Myers MSA is the bank's third largest assessment area in terms of lending activity.

As provided by the Department of Housing and Urban Development (HUD), the 2000 Median Family Income (MFI) for the Fort Myers MSA is \$46,411. The estimated MFI for the MSA changed from \$53,700 in 2005 and to \$56,000 in 2006. An estimated 4,758 or approximately 8.4 percent of all families in the assessment area live below the poverty level. The households with MFIs below the poverty level would generally not qualify for a home loan or support a monthly payment at the median home value of \$110,668 or a median gross rent of \$636.

D&B's 2006 data reports that 63.7 percent of businesses within the assessment area have gross annual revenues of less than \$1 million. The service sector is the largest sector of employment for Lee County. The largest employers in Lee County are Lee Memorial Health Systems and Wal-Mart. Lee County's unemployment rate for July 2007 was 4.7 percent. Unemployment figures as of July 2007 indicate that the Fort Myers MSA is experiencing higher unemployment levels than the State of Florida.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The following statements and conclusions are based on the bank's overall CRA performance. Lending, investment, and service performance in each of the bank's assessment areas was considered and weighted accordingly. Performance under the lending test is weighted more heavily than the investment and service tests when arriving at the overall rating.

LENDING TEST

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

The core tables reflected in Appendix A describe the loans reported by TIB pursuant to the HMDA and CRA data collection requirements for 2005. Core tables for 2006 and 2007 are discussed, but are not listed in the evaluation. The tables are numbered consecutively; however, tables that were not analyzed during the evaluation have been deleted from this evaluation. As detailed in Appendix A, the bank is a strong home mortgage and small business lender. As such, the home mortgage and small business performance were considered equally in the overall conclusions. Within product lines, home purchase loans are more than two times more prevalent than the number of home refinance loans. Further, the bank originated only 30 home improvement loans in 2005, 2006, and 2007 combined. This product was reviewed and no anomalies were found. In addition, the bank has originated 14 farm-related loans totaling \$1,156,000 in the past three years. This loan type was also analyzed with no anomalies noted.

Lending Activity and Assessment Area Concentration

TIB's performance reflects a good concentration of loans within its assessment areas. The bank has originated 85 percent (by number) and 87 percent (by dollar volume) of its home mortgage and small business loans within its assessment areas. Table 3 provides the delineation of loans inside and outside the assessment areas.

Loan Type	Number of Loans					Dollars in Loans (000s)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Home Mortgage (2005)	378	78.4%	104	21.6%	482	129,263	85.7%	21,555	14.3%	150,818
Home Mortgage (2006)	255	78.5%	70	21.5%	325	96,237	83.3%	19,231	16.7%	115,468
Small Business (2005)	399	91.9%	35	8.1%	434	77,649	88.7%	9,882	11.3%	87,531
Small Business (2006)	411	93.0%	31	7.0%	442	88,686	89.8%	10,028	10.2%	98,714
Total	1,443	85.7%	240	14.3%	1,683	391,835	86.6%	60,696	13.4%	452,531

Lending to Borrowers of Different Income Levels and Businesses of Different Sizes

The distribution of HMDA loans to borrowers of different incomes is poor and the bank's distribution of small business loans by revenue size is good. For home mortgage loans, the borrower's distribution in the Non-MSA area is satisfactory; however, the bank had weak performance in the Naples and Fort Myers MSAs. The bank has originated an excellent level of small business loans to businesses with revenues of \$1 million or less within the Non-MSA

assessment area. The bank demonstrated satisfactory performance to small businesses in both the Naples and Fort Myers MSAs. Based primarily on its small business loan activity, the lending volume for the Non-MSA area is approximately three times the number and dollar volume of the Naples or Fort Myers MSAs. As of the evaluation date, aggregate lending data for 2006 was not available.

HMDA Loans

The overall distribution of HMDA loans by borrower income level is poor.

For the Non-MSA area, in 2005, the distribution of home purchase loans to low-income borrowers is slightly higher than the aggregate lending data but significantly lower than the percentage of low-income families. Although the bank did not originate any home refinance loans to low-income borrowers in 2005, aggregate data reflected limited performance at 0.1 percent. In 2006 and 2007, TIB did not originate any home purchase or refinance loans to low-income borrowers in the Non-MSA area. Although the volume lent to low-income borrowers in 2005 is lower than the percentage of total families, it is not unusual as low-income borrowers generally request and can afford lower loan amounts. According to the demographic data, there are 2,618 low-income families in the Non-MSA area. Of these families, 54 percent have incomes below the poverty level. Since 81 percent of the housing stock in the Non-MSA area costs \$150,000 it is doubtful that low- and moderate-income borrowers could afford home prices at that level. In 2005, the bank's home purchase and refinance performance to moderate-income borrowers at 4.8 and 8.6 percent, respectively, is lower than the percentage of moderate-income families in Non-MSA areas at 12.5 percent. However, the bank's performance exceeds the aggregate lending data for home purchase loans at 0.6 percent and home refinance loans at 1.6 percent.

For the Naples MSA, the bank has demonstrated weak performance in its home mortgage lending to low-income borrowers. The bank did not originate any home purchase loans to low-income borrowers in 2005, 2006, or 2007. In 2005, all other banks extended 1.1 percent of their home purchase loans to low-income borrowers, but 19.1 percent of the families are considered low-income. In 2005, TIB originated 6.7 percent of its home refinance loans to low-income borrowers compared to all other lenders at 3.3 percent. In 2006 and 2007, the bank originated 4.6 and 8.3 percent of its refinance loans, respectively, to low-income borrowers. This does not compare favorably to the percent of low-income families at 19.1 percent. The bank extended a disproportionately high number of home purchase loans, over 87 percent for 2006 and 2007, to upper-income borrowers. Only 41 percent of the families in the Naples MSA are upper-income. Regarding moderate-income borrowers, the bank's home purchase performance of 5.8 percent in 2005 is lower than the percentage of moderate-income families, but parallels the aggregate lending data. The bank had adequate performance in originating 10.0 percent of its home refinance loans to moderate-income borrowers. Lastly, in 2006, TIB originated 3.8 and 18.2 percent of home purchase and refinance loans, respectively to moderate-income individuals.

For the Fort Myers MSA, the bank has demonstrated poor performance in its home mortgage lending to low-income borrowers. The bank has not originated any home purchase or home

refinance loans to low-income borrowers in the past three years. All other banks have extended 1.5 and 4.4 percent of their home purchase and refinance loans, respectively, to low-income borrowers, and 19.1 percent of the families are considered low-income. As such, the bank extended a disproportionately high number of home purchase loans, 75.6 percent to upper-income borrowers. Only 39.1 percent of the families in the Naples MSA are upper-income. In 2005, the bank originated 9.4 percent of its home purchase loans to moderate-income borrowers. This is lower than the percentage of moderate-income families, but slightly above the aggregate lenders at 8.0 percent. The bank had satisfactory performance in originating 15.4 percent of its home refinance loans to moderate-income borrowers. This is just slightly below all lenders at 17.8 percent. In 2006, TIB originated 6.1 percent of home purchase loans to moderate-income individuals, but no refinance loans.

Small Business Loans

The bank's distribution of small business loans by revenue size is good.

The distribution of loans to businesses by loan and revenue size is detailed in Table 11a of Appendix A. The bank's performance over the past three years in the Non-MSA area is excellent as the bank originated 70.3 percent, 82.2 percent, and 79.3 percent of its loans, respectively, to businesses with revenues of \$1 million or less. 2005 aggregate lending data indicates that all other lenders originated 47.5 percent of reported loans to small businesses. This performance also exceeds the percentage of small businesses in the Non-MSA area at 62 in 2005 or 63 percent in 2006. Further, in 2005 and 2006, 77 percent of the bank's loans were originated to businesses in loan amounts less than \$250,000. This indicates that the bank primarily originates smaller-sized business loans. Smaller-sized loans are generally used by small businesses.

The distribution of small business loans for the Naples MSA is satisfactory as the bank originated 56.1, 58.8, and 49.3 percent of its loans to businesses with revenues of \$1 million or less in 2005, 2006, and 2007, respectively. Aggregate lending data indicates that all other lenders originated 44.2 percent of reported loans to small businesses in 2005. The bank's lending performance is just slightly below the percentage of small businesses in the Naples MSA for 2005 and 2006. Further, 69.5, 74.6, and 80.0 percent of the bank's loans in 2005, 2006, and 2007, respectively, were originated to businesses in loan amounts less than \$250,000. This indicates that the bank primarily originates smaller business loans.

The distribution of small business loans for the Fort Myers MSA is reasonable as the bank originated 75.0, 48.1, and 63.0 percent of its loans to businesses with revenues of \$1 million or less in 2005, 2006, and 2007, respectively. Aggregate lending data indicates that all other lenders originated 44.8 percent of reported loans to small businesses in 2005. Further, 66.6, 65.4, 63.0 percent of the bank's loans in 2005, 2006, and 2007, respectively, were originated to businesses in loan amounts less than \$250,000. This indicates that the bank primarily originates smaller business loans.

Geographic Distribution of Lending

The bank's geographic distribution of HMDA and small business loans is adequate. As stated previously, the bank's Non-MSA area does not have any low- or moderate-income census tracts. The Naples MSA has four low- and nine moderate-income census tracts. The Fort Myers MSA has two low- and fifteen moderate-income census tracts. As of the evaluation date, the aggregate lending data for 2006 was not available.

HMDA Loans

The bank's geographic distribution of HMDA loans is detailed in tables 2a and 4a of Appendix A. As previously stated, more than 50 percent of the bank's loan activity is generated from the Non-MSA assessment area. Since the Non-MSA area does not have low- and moderate-income census tracts, a limited review was conducted. However, the bank's performance within middle-income census tracts was generally below both aggregate data and the percentage of owner-occupied housing units.

For the Naples MSA, the bank did not originate any home purchase or refinance loans in low-income census tracts in 2005 or 2006. However, based on 2000 U.S. Census data, there are only four low-income census tracts containing only 2.3 percent of all owner-occupied housing units in the assessment area. Therefore, this limits lending opportunities. Aggregate lending data supports this. Specifically, in 2005, all other lenders originated only 0.6 percent home purchase and 0.7 percent home refinance loans in this assessment area. As a result, the bank's lack of performance in the low-income census tracts is mitigated. According to the 2000 U.S. Census, the Naples MSA has nine moderate-income census tracts. In 2005, the bank's performance was less than satisfactory as the bank originated 3.7 percent of its home purchase and 3.1 percent of its refinance loans in moderate-income census tracts, which compares unfavorably with the percentage of owner occupied units at 13.1 percent. Further, aggregate lenders originated 13.8 percent of the home purchase and refinance loans in moderate-income census tracts. In 2006, the bank's performance rose to 10.3 percent for home purchase loans and to 16.7 percent for home refinance loans originated in moderate-income census tracts. This performance more closely parallels the percentage of owner-occupied housing units in moderate-income census tracts at 13.1 percent.

For the Fort Myers MSA, the bank did not originate any home purchase or refinance loans in low-income census tracts in 2005 or 2006. However, based on 2000 U.S. Census data, there are only two low-income census tracts containing only 2.1 percent of all owner-occupied housing units in the assessment area. Therefore, this limits lending opportunities. Aggregate lending data supports this. Specifically, in 2005, all other lenders originated only 1.2 percent home purchase and 1.0 percent home refinance loans in this assessment area. As a result, the bank's lack of performance in the low-income census tract is mitigated. The Fort Myers MSA has fifteen moderate-income census tracts. In 2005, the bank's performance is adequate as the bank originated 12.7 percent of its home purchase loans and 7.1 percent of its home refinance loans in moderate-income census tracts. However, this performance does not compare favorably with the percentage of owner occupied units at 19.0 percent, but is similar to aggregate data.

The bank demonstrated poor performance in moderate-income census tracts. The bank only originated 9.3 percent of its home purchase and did not originate any home refinance loans in moderate-income census tracts in 2006. This performance is much lower than the percentage of owner-occupied housing units in moderate-income census tracts at 19.1 percent.

Small Business Loans

The bank's geographic distribution of its small loans to businesses is detailed in Table 6a of Appendix A. Since the Non-MSA area does not have low- and moderate-income census tracts, a limited review was conducted. However, the bank's performance within middle-income census tracts exceeds both the aggregate data and the percentage of businesses for 2005, 2006, and 2007.

For the Naples MSA, the bank did not originate any small loans to businesses located in low-income census tracts in 2005. However, based on 2000 U.S. Census data, there are only four low-income census tracts containing 1.8 percent of the total businesses in the assessment area. Also, the aggregate lenders originated only 1.2 percent. The bank's performance did improve to 0.9 percent in 2006 and 2.7 percent in 2007. In 2005, the bank demonstrated satisfactory performance as 7.3 percent of small business loans were originated in the moderate-income census tracts. This performance is slightly below but similar to aggregate lenders and the percentage of businesses in moderate-income census tracts at 9.3 percent and 11.4 percent, respectively. The performance deteriorated to 2.6 percent in 2006 and 5.3 percent in 2007.

For the Fort Myers MSA, in 2005, the bank originated 2.8 percent of all small business loans in low-income census tracts. This is comparable to the 2.1 percent of businesses and 0.8 percent performance of the aggregate lenders. The bank did not originate any small business loans in 2006 or 2007 in low-income census tracts. In 2005, the lending efforts to moderate-income census tracts at 16.7 percent is reasonable in comparison to 24.0 percent of the total businesses and 11.9 percent performance of the aggregate lenders in moderate-income census tracts.

Community Development Lending

In light of available opportunities, TIB has financed a satisfactory level of community development loans since the previous evaluation. Commercial development in the bank's primary assessment area of the Florida Keys is severely restricted by law to preserve the environment. Nonetheless, the bank has financed a number of commercial and multifamily projects to revitalize blighted areas and designated enterprise zones. In addition, TIB has financed the purchase of several multifamily housing developments that qualify as affordable housing based on the high rental rates in the Florida Keys. Employers are often required to provide affordable housing for low wage workers to retain qualified employees. Since the previous evaluation, the bank funded 11 loans totaling \$17.3 million supporting economic development and job creation, and multifamily properties benefiting low- and moderate-income individuals. All eleven community development loans follow:

Non-MSA

- In November 2005, TIB extended \$3 million to a local developer to construct 18 affordable two-bedroom condominium units in Monroe County. The project calls for the development of 9 modular duplex buildings. Monroe County set the qualifying guidelines for prospective borrowers based on the annual affordable housing calculation.
- In January 2005, TIB extended \$4.5 million to a local developer to construct 38 affordable condominium units in Key West, Florida. The project will consist of 12 one-bedroom units and 26 two-bedroom units. The City of Key West set the qualifying guidelines for prospective borrowers based on the annual affordable housing calculation.
- In January 2007, TIB extended two loans totaling \$1 million to borrowers to purchase multifamily properties in Key West, Florida. This will provide affordable housing for the borrower's low- and moderate-income employees. Key West is facing a challenging situation on how to recruit and retain employees with limited resources that struggle in meeting the high costs of living in the Florida Keys.

Naples MSA

- In 2005, the bank financed the purchase of a \$1.8 million multi-use property consisting of affordable rental housing above commercial warehouse units in Collier County. The property is located in a moderate-income geography and is in the Davis Redevelopment Triangle.
- In 2006, the bank refinanced a \$1 million loan secured by 8 duplexes in Immokalee, Florida. The properties are located in the Immokalee Enterprise Zone and will provide 16 affordable rental units.
- In 2006, the bank provided a \$150,000 loan to a non-profit neighborhood health clinic that provides healthcare services to low-income families in Naples, Florida.

Fort Myers MSA

- In 2005, TIB provided a \$2.7 million construction loan for the conversion of a grocery store into a charter public school. The property is located in a low-income geography and is part of the Lee County/Fort Myers Enterprise Zone.
- In 2005, TIB extended \$500,000 line of credit to a local residential developer for an affordable housing project in Lehigh Acres, Florida. The developer is building single-family homes in a moderate-income geography to be sold below the Lee County affordable housing income limits.

Miami MSA

- In 2006, TIB extended a \$1.2 million loan to a local residential developer for an affordable housing project in Homestead, Florida. The sixteen single-family homes are located in a designated enterprise zone.

- In 2005, TIB extended a \$1.4 million loan to purchase and construct a go-kart and video game facility in Florida City, Florida. The facility is located in a designated enterprise zone. The project will create 23 new jobs for low- and moderate-income individuals when it is completed.

Innovative and Flexible Lending Programs

The institution makes adequate use of innovative and/or flexible lending practices to serve the credit needs of its assessment areas. The number and dollar volume of loans extended through various flexible lending programs are detailed below:

Innovative and Flexible Lending Programs 2004-2007		
SBA 504 and 7a Loans	3	\$1,552,700
Single Wide Mobile Homes	43	\$8,322,253
TOTAL	46	\$9,874,953

TIB is also a partner in the Certified Lenders Program (CLP) sponsored by the U.S. Small Business Administration (SBA). The program is designed to provide expeditious service on loan applications received from lenders who have a successful track record of SBA lending and a thorough understanding of SBA's policies and procedures. The key aspect of the CLP is the greater utilization of the lender's credit knowledge to shorten the SBA processing time. As shown above, during the evaluation period, the bank financed 3 loans totaling \$1.6 million through the SBA 504 and 7a programs. Management indicated that the volume of SBA loan requests has declined over the past three years due to the arduous application process and TIB's willingness to fund small business loans through conventional means without requiring the SBA's guaranty.

Through the secondary market, TIB offers flexible mortgage lending programs through Freddie Mac and Fannie Mae. The bank also offers mortgage loans targeting low- and moderate-income borrowers through the State Housing Initiatives Partnership (SHIP) Program (in the Florida Keys only); however, due to the extremely high cost and limited availability of housing in the Keys, the program has not been utilized during the evaluation period. The bank has initiated its own affordable housing program, in part, by financing the purchase of single-wide mobile homes. These homes no longer qualify under Freddie Mac and Fannie Mae guidelines and few lenders have stepped forward to fill the financing gap for one of the primary sources of affordable housing in the Keys. As shown above, TIB extended 43 loans totaling \$8.3 million for the purchase of owner-occupied, single-wide mobile homes in the Keys.

INVESTMENT TEST

Considering available investment opportunities, the level and innovation of the bank's qualified investments demonstrate good responsiveness to the credit and community development needs of the assessment areas. The bank maintains a significant level of qualified investments, particularly those that are not provided by private investors, and occasionally demonstrates a

leadership position in seeking new investment opportunities. Although many of the bank's investments are not particularly complex or innovative, the Board of Directors has devoted significant time and resources in researching and purchasing bond issues that are eligible for CRA consideration. However, most of the prime bonds issued by state and local governments are purchased by larger financial institutions.

TIB's qualified investments include revenue bonds issued by state and county agencies to finance affordable housing projects and charitable contributions to organizations benefiting low- and moderate-income individuals and small businesses.

In 2007, the bank purchased two Federal National Mortgage Association pools totaling \$2,265,084. These pools are securitized by single-family mortgages in which either the borrowers' incomes fall below 80 percent of the MFI or the properties are located in low- and moderate-income census tracts. These pools are secured by mortgages on homes located in Collier, Lee, and Miami-Dade Counties.

In 2006, the bank purchased a Department of Housing and Urban Development (HUD) bond totaling \$5,000,000. This bond is securitized by single-family mortgages in which either the borrowers' incomes fall below 80 percent of the MFI or the properties are located in low- or moderate-income census tracts. This pool is secured by mortgages on homes located throughout Florida. In addition, the bank continues to hold a HUD bond totaling \$1,000,000 that it purchased in 2003. This bond is securitized by single-family mortgages in which either the borrowers' incomes fall below 80 percent of the MFI or the properties are located in low- or moderate-income census tracts. This pool is secured by mortgages on homes located throughout the United States, including Florida.

TIB continues to hold \$3 million dollars in revenue bonds that were purchased during the prior evaluation period and continue to benefit the assessment areas. The bonds purchased in 2003, are issued by Centerline Holding Company (formally Charter Mac). This company is a private financial services provider that specializes in acquiring federally tax-exempt revenue bonds from state and local governments to finance the construction of affordable multifamily housing projects throughout the country. The bank owns 160,685 Centerline Series "A" Convertible Community Reinvestment Act Preferred Shares, which represents investments in three revenue bonds issued to construct affordable housing complexes in the bank's Southwest Florida assessment area. The bank allocated \$1 million of its investment toward the construction of Hawk's Landing, a 204-unit multifamily housing development in Ft. Myers, Florida. Another \$1 million of the bank's revenue bonds is allocated toward the construction of Hidden Grove, a 220-unit multifamily complex in Miami, Florida. The remaining \$1 million is dedicated for the construction of Running Brook Apartments, a 184-unit rental complex located in Miami, Florida. All of the units in the three housing complexes are designated for tenants earning 60 percent or less of the MSA median family income.

In addition, TIB continues to hold two revenue bonds that were also purchased during the prior evaluation period and continue to benefit the assessment areas. In November 2001, TIB purchased \$2,305,000 par value in Florida Housing Finance Corporation Housing Revenue

Bonds. The proceeds were used to finance the land acquisition and construction of Noah's Landing Apartments, a 264-unit rental development in unincorporated Collier County, Florida. Since the property qualifies for low-income housing tax credits, 40 percent of the units have been set aside for individuals and families earning 60 percent or less of the median family income for the area. In November 2000, the bank purchased \$255,000 in Florida Housing Finance Corporation Taxable Housing Revenue Bonds to finance the construction of Spring Harbor Apartments in Mt. Dora, Florida. All 248 units are occupied by households with incomes at or below 60 percent of the area's median gross median income and are rent-restricted as a result of the project's participation in the Low Income Housing Tax Credit Program.

During the evaluation period, TIB has supported many charitable organizations that benefit low- and moderate-income individuals and small businesses. The total amount of CRA qualified donations in 2005 was \$21,335, which represents 17 percent of total contributions for the year. For 2006, qualified donations increased to \$155,500, which represents 55 percent of the bank's annual contributions. The bank's qualified donations for year-to-date 2007 are approximately \$10,600. The major donation in 2006 consisted of a \$135,325 grant to Habitat for Humanity. This is a donation of land and building materials used to construct a home for a low-income family. Other recipients of sizable donations include the Neighborhood Health Clinic and the Habitat for Humanity organizations in various communities throughout the assessment areas to build affordable homes for low- and moderate-income families.

SERVICE TEST

Accessibility of Delivery Systems

TIB's delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas. The bank operates 17 full-service branches and 2 residential lending centers. Table 15 reflects the distribution of the bank's branches compared to the demographics of the assessment areas. The analysis includes both MSA and non-MSA branches of the bank.

According to the distribution, the bank has 9 offices (53 percent) located in the Monroe County Non-MSA area; 2 offices (12 percent) in the Miami, FL MSA, 3 offices (17 percent) in the Naples, FL MSA, 2 offices (12 percent) in the Ft. Myers, FL MSA., and 1 in the Highlands County Non-MSA area (6 percent). The Highlands County area is not shown on Table 15. Although none of the offices are located in low- or moderate-income census tracts, it is noted that there are no low- or moderate-income census tracts in the bank's primary assessment area of Monroe County. Approximately 53 percent of the number and 48 percent of the dollar volume of the bank's total loan activity is originated in Monroe County. Moreover, several of the bank's offices in the other assessment areas are easily accessible to low- and moderate-income areas. Therefore, the geographic distribution of the bank's office locations is adequate considering the demographics of the assessment areas.

TIB offers the capability to perform banking functions through a variety of alternative channels. The bank's two residential lending centers located in middle-income census tracts of Naples and

Sebring, Florida, provide customers easy access to mortgage credit and information in these fast-growing areas. TIB maintains drive-up facilities at 15 of its 17 offices, and provides ATMs and 24-hour night depositories at all offices except one in Naples. In addition, the bank operates six remote ATMs in the cities of Key West, Estero, and Islamorada in the Monroe County Non-MSA area. Three of the stand-alone ATMs are located in upper-income census tracts and one in a middle-income census tract. The bank also offers 24-hour telephone banking services to access account balances, inquiries and transfers, and monthly statement information. Presently, management offers TIBLink Internet Banking to all customers free of charge. The system permits customers to retrieve balances, transfer funds, print statements, access account histories, view check images, and utilize bill payment services for an additional fee. All of the bank's branch offices offer the full line of products and services.

Changes in Branch Locations

To the extent changes have been made, TIB's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income areas or to low- and moderate-income individuals. Since the previous evaluation, TIB opened three new branches and has not closed any branches. In July 2004, August 2004, and December 2006, management opened full-service branches in middle-income census tracts of Lee, Collier, and Highlands Counties, respectfully. Although the new branches are not directly located in low- or moderate-income census tracts, the bank's expansion into these new areas increased the availability of banking services in the assessment areas to customers of all income levels.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

TIB's services, including business hours, do not vary in a way that inconvenience certain portions of the assessment areas, particularly low- and moderate-income census tracts or any group of individuals. Branch hours are generous compared to other local financial institutions. Depending on the location, the lobbies are open as early as 8:00 a.m. and close as late as 6:00 p.m. on Friday evening. To accommodate working customers and small business owners, the bank provides Saturday banking hours from 8:00 a.m. to 12:00 p.m. at 10 of the bank's 17 offices. The residential lending centers in Naples and Sebring provide customers additional access to mortgage services from 9:00 a.m. to 6:00 p.m. Mortgage loan officers at all locations are available to accept applications after hours at a customer's residence or place of business.

With regard to retail deposit products, TIB offers an innovative product, the indexed NOW account, to non-profit organizations. The bank also provides free checking accounts to employees of designated large business customers. Due to the high cost of living in the Florida Keys, the free checking accounts primarily benefit low- and moderate-income employees in the services industry. The bank also offers "Truly Free Checking" personal checking accounts, with no minimum balance and no monthly service charge. All of the account disclosures and advertising are provided in both English and Spanish to accommodate the large Spanish speaking population in the assessment areas.

Community Development Services

TIB provides a relatively high level of community development services to organizations in the assessment areas. The directors, officers, and employees of TIB are involved in several community development organizations that provide small business assistance, economic development, and community services for low- and moderate-income individuals. All of the examples of community development services detailed below meet the definition of community development and relate to the provision of financial services or technical assistance as required by the CRA regulation.

- Several bank directors and officers provide financial and technical expertise to promote economic development as officials for the various Chambers of Commerce throughout the assessment areas, including in Islamorada, Marathon, Key Largo, Lower Keys, Upper Keys, Homestead/Florida City, and Naples.
- Several bank officers and employees provide financial and technical expertise to the community through their service to the various chapters of Habitat for Humanity, an organization that provides affordable housing for low- and moderate-income families. The officers help qualify applicants for the program and provide homeownership counseling before and after the purchase.
- On a rotating basis, three bank officers serve as mentors and provide financial counseling to participants in the Take Stock in Children Program sponsored by the State of Florida. The program provides guaranteed college scholarships for low- and moderate-income youths who maintain reasonable academic standards and remain drug-free.
- As Mayor of Florida City, a director provides technical and financial expertise to social service organizations that benefit low- and moderate-income people. The director serves as a Board member of the Homestead Area Indigent Care Foundation and Chairman of the Florida City Foundation.
- A director serves as Chairman of the Florida City Redevelopment Agency, an organization that promotes economic development for the predominately low- and moderate-income areas of Florida City.
- A director and a bank officer serve as Board members of the Vision Council, an organization that promotes economic development for the predominately low- and moderate-income areas of Homestead and Florida City.
- A senior loan officer has provided training on the SBA loan process for several small business and economic development organizations.
- A bank officer serves a Chairman of the CDBG Citizens Advisory Task Force, which is an affordable housing initiative for the Village of Islamorada.

- A bank officer serves as president and another as an audit committee member for the Shelter for Abused Women, an organization that provides social services for primarily low- and moderate-income women and children.
- As Board members of the Upper Keys Business and Professional Women, two bank officers serve on the scholarship committee that provides financial assistance to low- and moderate-income students.
- A bank officer serves on the Board of Directors for the Grace Jones Community Daycare, a nonprofit organization that serves low- and moderate-income families.
- As a member of the American Business Women's Association, a bank officer provides financial counseling, clothing, and mentoring to low- and moderate-income clients entering the workforce.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No fair lending or other illegal credit practice violations were identified during this evaluation.

**METROPOLITAN AREAS
(Limited Review)**

SCOPE OF EVALUATION

A limited analysis for one of the bank’s assessment areas was performed for this CRA evaluation as follows: Miami FL, MSA. TIB’s lending activity in this area represents less than 4.2 percent of the number of loans and 2.2 percent of the total dollar volume of loans originated by the bank inside all of the assessment areas during the evaluation period. With two offices in the Miami, FL MSA, lending patterns in this assessment area does not significantly affect the bank’s overall performance. Nonetheless, lending data was reviewed to ensure that TIB’s performance within this area was consistent with the results in which full-scope CRA examination procedures were used. No anomalies were noted.

BRANCH DISTRIBUTION AND LOAN VOLUME FOR MIAMI, FL MSA						
<u>Assessment Area</u>	<u>Branches</u>		<u>Number of Loans</u>		<u>Dollar Volume of Loans</u>	
	<u>#</u>	<u>%</u>	<u>#</u>	<u>%</u>	<u>\$</u>	<u>%</u>
Miami, FL MSA	2	12%	61	4.2%	\$8,591	2.2%

DESCRIPTION OF OPERATIONS IN MIAMI, FL MSA

TIB maintains two full service offices in the Miami FL, MSA, both of which are located in middle-income census tracts. The bank’s assessment area in the Miami, FL MSA consists of 1 low-income census tract (7 percent), 4 moderate-income census tracts (29 percent), 8 middle-income census tracts (57 percent), and no upper-income census tracts (0 percent). One census tract has no income designation (7 percent). Approximately 32 percent of the families in the Miami, FL MSA area are low-income, 19 percent are moderate-income, 19 percent are middle-income, and 30 percent are upper-income.

CONCLUSIONS WITH RESPECT TO PERFORMANCE IN MIAMI, FL MSA

Lending volume in the Miami, FL MSA comprises approximately 4.2 percent of the total number and 2.2 percent of the total dollar volume of all loan types originated inside the assessment areas during the evaluation period. Considering the bank’s limited presence in the Miami, FL MSA, the geographic and borrower distributions of home mortgage and small business loans are reasonable.

The geographic distribution of loans originated by TIB reflects good penetration throughout the assessment area for small business loans and home mortgage loans. Similarly, the borrower distribution of small business loans is good, while the volume of home loans extended to low- and moderate-income individuals is adequate compared to the demographics of the assessment area.

In addition, the bank originated two community development loans totaling \$2.6 million within the assessment area. Refer to the tables in Appendix A for additional information.

SCOPE OF EXAMINATION:

TIB Bank
SCOPE OF EXAMINATION: The scope of the examination included a review of the bank’s small business loans, small farm loans, and home mortgage loans.
TIME PERIOD REVIEWED: Small Business and Home Mortgage Loans 1/1/05-6/30/2007 Investments and Community Development Loans and Services 7/15/04-8/20/07
PRODUCTS REVIEWED: Small Business and Home Purchase and Home Refinance Loans

LIST OF AFFILIATES AND PRODUCTS REVIEWED		
AFFILIATE(S):	AFFILIATE RELATIONSHIP:	PRODUCTS REVIEWED:
The Bank of Venice, Venice, Florida	Ownership	None

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA:	TYPE OF EXAMINATION:	BRANCHES VISITED:	OTHER INFORMATION:
Non-MSA Monroe County	Full Scope	Main Office	NA
Naples, FL	Full Scope	One	NA
Fort Myers, FL	Full Scope	NA	NA
Miami FL, MSA	Limited Scope	NA	NA

Appendix A

Institution ID: TIB BANK (3000021435) (Included)

Table 1. Lending Volume

LENDING VOLUME		Geography: TIB-OVERALL 2005				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2005						
MA/Assessment Area (2005):	% 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:												
TIB-Fort Myers MSA	13.61	71	18,466	36	7,372	0	0	0	0	107	25,838	0.00
TIB-Naples MSA	29.52	150	59,742	82	17,345	0	0	0	0	232	77,087	0.00
TIB-Non-MSA Monroe	52.80	142	49,431	266	51,717	7	335	0	0	415	101,483	0.00
Limited Review:												
TIB-Miami MSA	4.07	15	1,624	15	1,215	2	300	0	0	32	3,139	0.00

* Loan Data as of December 31, 2005. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2006 to December 31, 2006.

*** Deposit Data as of September 10, 2007. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

(Included)

Table 1. Other Products

LENDING VOLUME		Geography: TIB-OVERALL 2005				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2005								
MA/Assessment Area (2005):	% of Rated Area Loans (#) in MA/AA*	Total Optional Loans		Small Business Real Estate Secured**		Home Equity**		Motor Vehicle**		Credit Card**		Other Secured Consumer**		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:														
TIB-Fort Myers MSA	4.00	3	512	3	512	0	0	0	0	0	0	0	0	0.00
TIB-Naples MSA	16.00	12	5,203	12	5,203	0	0	0	0	0	0	0	0	0.00
TIB-Non-MSA Monroe	77.33	58	18,962	58	18,962	0	0	0	0	0	0	0	0	0.00
Limited Review:														
TIB-Miami MSA	2.67	2	108	2	108	0	0	0	0	0	0	0	0	0.00

* Loan Data as of December 31, 2005. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Optional Product Line(s) is from January 01, 2005 to December 31, 2005.

*** Deposit Data as of September 10, 2007. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: TIB BANK (30000021435) (Included)

Table2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: TIB-OVERALL 2005				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2005				Aggregate HMDA Lending (%) by Tract Income*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		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:														
TIB-Fort Myers MSA	55	21.07	2.13	0.00	19.08	12.73	59.79	45.45	19.00	41.82	1.16	13.63	56.20	29.00
TIB-Naples MSA	107	41.00	2.30	0.00	13.08	3.74	47.98	49.53	36.65	46.73	0.60	13.76	49.02	36.62
TIB-Non-MSA Monroe	88	33.72	0.00	0.00	0.00	0.00	20.25	6.82	79.75	93.18	0.00	0.00	15.69	84.31
Limited Review:														
TIB-Miami MSA	11	4.21	3.89	0.00	24.36	63.64	71.74	36.36	0.00	0.00	1.71	18.63	79.66	0.00

* Based on 2005 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 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.

Institution ID: TIB BANK (3000021435) (Included)

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: TIB-OVERALL 2005				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2005				Aggregate HMDA Lending (%) by Tract Income*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		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:														
TIB-Fort Myers MSA	1	5.00	2.13	0.00	19.08	0.00	59.79	100.00	19.00	0.00	1.40	15.22	64.71	18.67
TIB-Naples MSA	10	50.00	2.30	0.00	13.08	0.00	47.98	30.00	36.65	70.00	0.94	17.33	56.31	25.42
TIB-Non-MSA Monroe	9	45.00	0.00	0.00	0.00	0.00	20.25	11.11	79.75	88.89	0.00	0.00	20.64	79.36
Limited Review:														
TIB-Miami MSA	0	0.00	3.89	0.00	24.36	0.00	71.74	0.00	0.00	0.00	3.48	16.81	79.71	0.00

* Based on 2005 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.

Institution ID: TIB BANK (3000021435) (Included)

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: TIB-OVERALL 2005						Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2005						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate HMDA Lending (%) by Tract Income*			
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Low	Mod	Mid	Upp
Full Review:														
TIB-Fort Myers MSA	14	14.74	2.13	0.00	19.08	7.14	59.79	42.86	19.00	50.00	1.01	15.49	64.95	18.55
TIB-Naples MSA	32	33.68	2.30	0.00	13.08	3.13	47.98	40.63	36.65	56.25	0.71	13.75	54.64	30.90
TIB-Non-MSA Monroe	45	47.37	0.00	0.00	0.00	0.00	20.25	11.11	79.75	88.89	0.00	0.00	17.27	82.73
Limited Review:														
TIB-Miami MSA	4	4.21	3.89	0.00	24.36	75.00	71.74	25.00	0.00	0.00	3.06	19.40	77.54	0.00

* Based on 2005 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.

Institution ID: TIB BANK (3000021435) (Included)

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES														Geography: TIB-OVERALL 2005		Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2005			
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Aggregate Lending (%) by Tract Income*								
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses**	% BANK Loans	Low	Mod	Mid	Upp					
Full Review:																			
TIB-Fort Myers MSA	36	9.02	2.12	2.78	23.99	16.67	53.73	58.33	20.17	22.22	0.83	11.91	61.87	25.40					
TIB-Naples MSA	82	20.55	1.80	0.00	11.38	7.32	44.18	42.68	42.64	50.00	1.20	9.32	46.31	43.17					
TIB-Non-MSA Monroe	266	66.67	0.00	0.00	0.00	0.00	25.82	30.08	74.18	69.92	0.00	0.00	25.41	74.59					
Limited Review:																			
TIB-Miami MSA	15	3.76	8.90	26.67	27.37	20.00	62.89	53.33	0.00	0.00	3.82	19.20	30.84	46.14					

* Based on 2005 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 (2005).

Institution ID: TIB BANK (30000021435) (Included)

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: TIB-OVERALL 2005					Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2005							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
TIB-Fort Myers MSA	55	21.07	19.05	0.00	19.39	9.43	22.48	15.09	39.07	75.47	1.46	7.99	20.03	70.52
TIB-Naples MSA	107	41.00	19.06	0.00	19.32	5.83	20.65	18.45	40.97	75.73	1.09	6.02	16.30	76.59
TIB-Non-MSA Monroe	88	33.72	12.67	2.38	12.51	4.76	17.41	3.57	57.40	89.29	0.24	0.56	1.33	97.86
Limited Review:														
TIB-Miami MSA	11	4.21	32.01	18.18	19.45	9.09	18.58	9.09	29.96	63.64	0.36	3.54	18.45	77.64

* Based on 2005 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 3.8% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

**** 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 1990 Census information.

Institution ID: TIB BANK (3000021435) (Included)

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: TIB-OVERALL 2005					Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2005							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*			
	#	% of Total**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp
Full Review:														
TIB-Fort Myers MSA	1	5.00	19.05	0.00	19.39	0.00	22.48	100.00	39.07	0.00	4.30	16.52	29.52	49.66
TIB-Naples MSA	10	50.00	19.06	0.00	19.32	10.00	20.65	30.00	40.97	60.00	3.79	16.97	26.55	52.69
TIB-Non-MSA Monroe	9	45.00	12.67	0.00	12.51	0.00	17.41	0.00	57.40	100.00	0.98	1.95	7.32	89.76
Limited Review:														
TIB-Miami MSA	0	0.00	32.01	0.00	19.45	0.00	18.58	0.00	29.96	0.00	3.32	15.11	22.05	59.52

* Based on 2005 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

**** 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 1990 Census information.

Institution ID: TIB BANK (3000021435) (Included)

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE														Geography: TIB-OVERALL 2005				Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2005			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Aggregate Lending Data*										
	#	% of Total**	% Families** *	% BANK Loans****	% Families** *	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Low	Mod	Mid	Upp							
Full Review:																					
TIB-Fort Myers MSA	14	14.74	19.05	0.00	19.39	15.38	22.48	23.08	39.07	61.54	4.38	17.67	29.54	48.41							
TIB-Naples MSA	32	33.68	19.06	6.67	19.32	10.00	20.65	20.00	40.97	63.33	3.25	16.85	25.31	54.59							
TIB-Non-MSA Monroe	45	47.37	12.67	0.00	12.51	8.57	17.41	25.71	57.40	65.71	0.12	1.61	6.32	91.95							
Limited Review:																					
TIB-Miami MSA	4	4.21	32.01	0.00	19.45	0.00	18.58	33.33	29.96	66.67	2.33	12.48	30.18	55.01							

* Based on 2005 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 14.7% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

**** 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 Families is based on the 1990 Census information.

Institution ID: TIB BANK (3000021435) (Included)

Table11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
				Geography: TIB-OVERALL 2005			Evaluation Period: JANUARY 1, 2005 TO DECEMBER 31, 2005		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Aggregate Lending Data*	
	#	% 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:									
TIB-Fort Myers MSA	36	9.02	62.13	75.00	58.33	8.33	33.33	20,475	9,181
TIB-Naples MSA	82	20.55	64.05	56.10	54.88	14.63	30.49	13,065	5,775
TIB-Non-MSA Monroe	266	66.67	61.96	70.30	54.89	22.18	22.93	4,338	2,059
Limited Review:									
TIB-Miami MSA	15	3.76	63.75	80.00	73.33	26.67	0.00	76,251	34,356

* Based on 2005 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 - 2005).

**** 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 12.03% of small loans to businesses originated and purchased by the bank.

Institution ID: TIB BANK (30000021435) (Included)

Table15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: TIB-OVERALL				Evaluation Period: JULY 15, 2004 TO JUNE 30, 2007									
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:																	
TIB-Fort Myers MSA	0.00	2	11.8	0.00	0.00	0.00	0.00	1	0	0	0	1	0	4.17	28.17	53.27	14.39
TIB-Naples MSA	0.00	3	17.6	0.00	0.00	0.00	0.00	1	0	0	0	0	1	7.48	18.77	45.24	28.51
TIB-Non-MSA Monroe	0.00	9	52.9	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	0.00	27.68	72.32
Limited Review:																	
TIB-Miami MSA	0.00	2	11.8	0.00	0.00	0.00	0.00	0	0	0	0	0	0	7.80	33.56	58.19	0.00

APPENDIX B - GENERAL DEFINITIONS

GEOGRAPHY TERMS

Block: Small areas bounded on all sides by visible features such as streets, roads, streams or rail road tracks, and invisible features like city or town boundaries or property lines. Blocks are subdivisions of census tracts or block numbering areas (BNA), and are assigned a unique three-digit number.

Block Group: Clusters of blocks within a census tract or BNA, having a four-digit number and a three-digit suffix. The four-digit number corresponds to the same number given to the census tract or BNA in which it is located.

Block Numbering Areas (BNAs): Statistical subdivisions of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. BNAs do not cross county lines.

Census Tract: Small subdivisions 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. They 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.

Metropolitan Area (MA): One or more large population centers and adjacent communities that have a high degree of economic and social integration. Each MA must contain either a place with a minimum population of 50,000 of Census Bureau-defined urbanized area and a total MA population of at least 100,000 (75,000 in New England). An MA comprises one or more central counties and may include one or more outlying counties that have close economic and social relationships with the central county. In New England, MAs are composed of cities and towns rather than whole counties.

Metropolitan Statistical Area (MSA): One or more metropolitan areas that have economic and social ties.

Primary Metropolitan Statistical Area (PMSA): A large urbanized county or cluster of counties that demonstrate very strong internal economic and social links, in addition to close ties to other portions of the larger area. If an area qualifies as an MA and has more than one million persons, PMSAs may be defined within it.

Consolidated Metropolitan Statistical Area (CMSA): The larger area of which PMSAs are component parts.

Non-Metropolitan Area: All areas outside of metropolitan areas. The definition of non-metropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies; for example, there is generally both urban and rural territory within both metropolitan and non-metropolitan areas.

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in: places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin) but excluding the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

Rural Area: Territories, populations and housing units that are not classified as urban.

HOUSING TERMS

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).

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.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

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.

INCOME TERMS

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide non-metropolitan median family income, if a person or geography is located outside an MSA.

Family Income: Includes the income of all members of a family that are age 15 and older.

Household Income: Includes the income of the householder and all other persons that are age 15 and older in the household, whether related to the householder or not. Because many households consist of only one person, median household income is usually less than median family income.

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.

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 and less than 80 percent in the case of a geography.

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 and less than 120 percent in the case of a geography.

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.

HUD Adjusted Income Data: The U.S. Department of Housing and Urban Development (HUD) issues annual estimates which update median family income from the metropolitan and non-metropolitan areas. HUD starts with the most recent U.S. Census data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

OTHER TERMS

Home Mortgage Disclosure Loan Application Register (HMDA LAR): The HMDA LARs record all applications received for residential purchase, refinance, home improvement and temporary-to-permanent construction loans.

Small Business Loan: 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 are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

APPENDIX C - INVESTMENT DEFINITIONS

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. The equity investments are subject to limits specified by the bank's regulator. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community as well as to the financial and marketing needs of the bank. A CDC may purchase, own, rehabilitate, construct, manage and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization. Any real estate ownership should generally be temporary, with ownership reverting to members or organizations in the community.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. They procure loans and investments that conventional financial institutions are unable to invest in, and they link financing to other developmental activities. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. CDFIs share a common mission and can be chartered as a credit union or bank. CDFIs can also be unregulated nonprofit institutions that gather private capital from a range of social investors for community development lending or investing. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, microenterprise funds, and community development venture capital funds. A certified CDFI must meet eligibility requirements, which include: having a primary mission of promoting community development; serving an investment area or target population; providing development services; maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means; and not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Low Income Housing Tax Credits: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended, which is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department, through the Internal Revenue Service, distributes low-income housing tax credits to housing credit agencies. The housing agencies allocate tax credits on a competitive basis. Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits or sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains in place throughout the compliance period, usually 30 years.

Qualified Investments: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development to support the following endeavors: 1) affordable housing; 2) community services targeting low- and moderate-income individuals; 3) activities that promote economic development by financing small farms and small businesses; and 4) activities that revitalize or stabilize low- and moderate-income geographies.

APPENDIX D - STANDARD PE LANGUAGE

LENDING TEST

Scope of Test

The lending test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) by considering an institution's home mortgage, small business, small farm, and community development lending. The institution's lending performance is evaluated pursuant to the following criteria: 1) the volume of lending activity; 2) the proportion of lending within the assessment area(s); 3) the dispersion of loans and the number and amount of loans in low-, moderate-, middle- and upper-income geographies in the assessment area(s); 4) the distribution of loans among borrowers of low-, moderate-, middle- and upper-income levels and businesses (including farms) of different sizes; 5) the distribution of small business and small farm loans by loan amount at origination; 6) the volume of community development lending; and 7) the use of innovative or flexible lending practices. Performance under the lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

Community Development Lending:

Performance Criteria

The institution's community development lending activities are evaluated pursuant to the following criteria: 1) the extent to which community development lending opportunities have been made available to the institution; 2) the responsiveness of the institution's community development lending; and 3) the extent of leadership the institution has demonstrated in community development lending.

Innovative and Flexible Lending Practices:

Performance Criteria

The institution's innovative and flexible lending practices are evaluated pursuant to the following criteria: 1) the degree to which the loans serve low- and moderate-income creditworthy borrowers in new ways or serve groups of creditworthy borrowers not previously served by the institution; and 2) the success of each product serving low- and moderate-income borrowers, including the number and dollar volume of loans originated during the review period.

INVESTMENT TEST

Scope of Test

The investment test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through its use of qualified investments that benefit the assessment area(s) or a broader statewide or regional area that includes the institution's assessment area(s). Activities considered under the lending or service test may not be considered under the investment test. The institution's investment performance is evaluated pursuant to the following criteria: 1) the dollar amount of qualified investments; 2) the innovativeness or complexity of qualified investments; 3) the responsiveness of qualified investments to credit and community development needs; and 4) the degree to which the qualified investments are not routinely provided by private investors.

SERVICE TEST

Scope of Test

The service test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the institution's systems for delivering retail banking services and the extent and innovativeness of its community development services. The institution's retail banking services are evaluated pursuant to the following criteria: 1) the distribution of the institution's branches among geographies of different income levels; 2) the record of opening and closing branches, particularly branches located in low- and moderate-income geographies or that primarily serve low- or moderate-income individuals; 3) the availability and effectiveness of alternate systems for delivering retail banking services; and 4) the range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

In addition, the institution's community development services are evaluated pursuant to the following criteria: 1) the extent of community development services offered and used; 2) the innovativeness of community development services, including whether they serve low- and moderate-income customers in new ways or serve groups of customers not previously served; 3) the degree to which they serve low- and moderate-income areas or individuals; and 4) their responsiveness to available opportunities for community development services.

