

# PUBLIC DISCLOSURE

April 06, 2015

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

CenterState Bank of Florida, National Association Charter Number 22311

> 1101 First Street South Winter Haven, FL 33880

Office of the Comptroller of the Currency Tampa Field Office 4042 Park Oaks Blvd Suite 240 Tampa, FL 33610

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 **CenterState Bank of Florida**, **National Association** (CSB) with respect to the Lending, Investment, and Service Tests:

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

<sup>\*</sup> 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:

- The bank's overall lending activity in the AA (Assessment Area) is good. The majority of loans were originated in the bank's AA.
- Home mortgage lending reflects adequate penetration among different geographies and borrower income levels.
- Small loans to businesses provide an excellent penetration among different geographies and borrower income levels.
- Community development lending had a positive impact on the bank's overall lending performance.
- The bank's performance under the investment test is adequate. The bank has a significant level of qualified investments, totaling \$18.4 million, or 5.42 percent of tier 1 capital. However, all investments were statewide or regional investments and were less responsive to AA needs.
- The bank's performance under the service test was good. CSB's retail delivery systems are accessible to the bank's geographies and individuals of different income levels in its AAs. The bank provides an adequate level of community services.

### **Definitions and Common Abbreviations**

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

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

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/AA.

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 MAs. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

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

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

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

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

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

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

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

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

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

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

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

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

**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 is used to determine the

income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (call report) 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.

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

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

# **Description of Institution**

CenterState Bank of Florida, NA (CSB) is an intrastate nationally chartered commercial bank headquartered in Winter Haven, Florida. CSB is wholly owned by CenterState Banks, Inc., a one-bank holding company headquartered in Davenport. CSB started as The First National Bank of Polk County in Haines City, formed in the early 1990s, and CenterState Bank in Winter Haven that started operation a few years later. In January 2006, the two banks combined into the present CenterState Bank of Florida, NA. By December 2010, CenterState Bank of Central Florida, NA. Kissimmee (started in 1989 as the First National Bank of Osceola County) and CenterState Bank, NA. Zephyrhills (originally chartered in 1989 as the Community National Bank of Pasco) merged into CenterState Bank of Florida, NA. CenterState Bank acquired the final bank within the CenterState Banks, Inc. (NASDAQ CSFL) holding company, Valrico State Bank, in June 2012. Presently the only other CenterState Bank asset is a small problem asset subsidiary, R4ALL.

CSB has grown significantly through bank acquisitions. The acquisitions began in 2009 with the purchase of several failed banks in Florida. Since 2011, the following acquisitions and mergers occurred:

- January 2012 Acquired the deposits of the failed Central Florida State Bank. Physical branches were not included in the purchase. Closed four branches after the acquisition and temporarily occupied the main Belleview branch. (Marion County)
- January 2012 Acquired the failed First Guaranty Bank and Trust Company in Jacksonville. (Duval County)
- May 2012 Merger of Valrico State Bank, added five branches (Hillsborough County).
- January 2014 Merger of GulfStream Business Bank, added four branches (Palm Beach, Martin and St. Lucie Counties)
- September 2014 Acquisition of First Southern Bank, added seven branches; six branches sold to Fidelity Bank in September 2014; four branches closed (Broward, Palm Beach, and St. Lucie Counties)
- Other offices closed in 2014 included locations in Citrus, Lake, Osceola, Sumter, and Volusia Counties.

Refer to Table 15 for a summary of branch openings and closings during the evaluation period.

The 2014 bank acquisitions added approximately \$1.2 billion in total assets. As of December 31, 2014, the bank had total assets of \$3.78 billion with average net loans and leases accounting for 64.02 percent of total assets. Tier 1 capital for year-end 2014 totaled \$340 million.

CSB operates 58 branch offices in 21 counties across fifteen assessment areas throughout Florida. Automated teller machines (ATMs) and drive-thru facilities are available at the main office and at 59 and 53 branch locations, respectively. The primary focus of the bank is loans for business purposes, which include lines of credit, real estate loans, construction loans, and Small Business Administration loans. The breakdown of the bank's loan portfolio by product type is listed in the table below.

Loan Portfolio Composition (12/31/2014)	\$(000)	% of total
1-4 Family Residential	694	28.55
Multi-family Real Estate	50	2.04
Commercial Real Estate	1,193	49.09
Commercial & Industrial	270	11.09
Commercial Construction or Development	77	3.18
Consumer	58	2.39
Other	89	3.66
Total	2,431	100.00

Source: FFIEC Report of Condition and Income

CSB is a qualified U.S. Small Business Administration (SBA) lender, offering 7(a) and 504 SBA loan products. During the evaluation period, CSB originated 26 SBA loans, which are considered in the lending test portion of this evaluation. Affordable residential lending products include Federal Housing Administration (FHA) loans, United States Department of Agriculture (USDA), and Veterans Administration (VA) loans. During the evaluation period, CSB originated 232 FHA, USDA, and VA loans, which are considered in the lending test portion of this evaluation.

According to the June 30, 2014 FDIC data, CSB has 0.72 percent of the market share in the State of Florida. Bank of America (18.45 percent), Wells Fargo (15.43 percent), SunTrust (9.47 percent), JPMorgan Chase (4.68 percent), and Regions Bank (4.13 percent) are the top five market share holders in the State of Florida and are also competitors in all the bank's assessment areas. Deposit market share data for the full scope AAs is discussed within the performance test conclusions and in the market profiles section of this evaluation.

There are no financial or legal impediments that would prevent the bank from meeting the credit needs of the community it serves. The preceding CRA evaluation is dated March 5, 2012, where the bank received a "Satisfactory" rating.

# Scope of the Evaluation

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

For HMDA and small business lending, the evaluation period includes all reported activity for years 2012, 2013, and 2014. For CD activities, the evaluation period begins from the last CRA evaluation, March 6, 2012, up to the start date of this evaluation, April 6, 2015.

### **Data Integrity**

A data integrity review was conducted by the OCC in September 2014. The review verified the accuracy and reliability of data reported by the bank for HMDA loans, small business loans and community development loans. The data was reviewed for years 2012, 2013, and 2014. The OCC also reviewed investments and service activities occurring within the same time period, to determine if these qualified for CD consideration. It was determined that the bank's processes and controls for the collection and reporting of loan data and community development activities are satisfactory. Therefore, this CRA evaluation is based on reliable data.

### Selection of Areas for Full-Scope Review

Full-scope reviews were performed for the following AAs: MSA 29460- Lakeland, MSA 36740-Orlando, and MSA 45300-Tampa. The selection of full-scope AAs was based on the percentage of CSB deposits and loans within each AA. These three AAs represent 44.8 percent of AA deposits and 63.5 percent of reported loan originations. Refer to Appendix B, Market Profiles, for detailed descriptions of the full-scope AAs.

The remaining bank AAs were evaluated as limited-scope reviews: MD 22744- Broward County, MD 48424- Palm Beach County, MSA 19660- Volusia County, MSA 26140- Citrus County, MSA 27260- Duval County, MSA 36100- Marion County, MSA 38940 Martin-St Lucie Counties, MSA 42680- Indian River County, MSA 45540- Sumter County (The Villages), NonMSA Hendry-Okeechobee Counties, and NonMSA-Putnam County. Refer to Appendix B, Market Profiles, for summary descriptions of the limited-scope AAs.

# Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews. The greatest weight was given to the Lakeland MSA, which has the largest share of loans and deposits, at 32.8 percent and 21.4 percent, respectively. The Lakeland MSA is the location of the bank's headquarters and the majority of its branch offices. The Orlando MSA has the second largest share of bank loans and deposits, at 15.7 percent and 16.5 percent respectively. Lastly, the Tampa MSA has 15.0 percent and 16.8 percent share of the bank's loans and deposits, respectively.

Ratings primarily consider the performance in the AA and items in the broader statewide or regional area. The evaluation involves the number, dollar volume, and responsiveness of the investments to identified CD needs. Investments made in the broader statewide or regional areas receive slightly less weight than AA investments. In completing the analysis, we found that CSB demonstrates adequate performance for the AA consistent with the bank's capacity; therefore, statewide and regional investments are considered in this evaluation.

### **Other**

During this evaluation, we contacted one community development organization (CDO) from the Lakeland MSA. We also incorporated information from community contacts conducted in 2014 and 2015 for the Orlando MSA and the Tampa MSA. The community contacts provided an assessment of the community's needs, opportunities in which financial institutions may participate in meeting those needs, and information on the perception of financial institutions involvement in the community. Credit needs noted by the CDO include access to capital, particularly for startup businesses. Financial literacy counseling for individuals and business owners was also cited as needed in the community. Refer to the Market Profiles in appendix B for more information on the community contacts.

# Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), or 12 CFR 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

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

# **Conclusions with Respect to Performance Tests**

#### **LENDING TEST**

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

The bank's performance under the lending test is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the Lakeland MSA, Orlando MSA and Tampa MSA is good. The bank's primary focus is small business lending and therefore this lending activity had the greatest impact on the overall Lending Test conclusion.

Lending performance in the Lakeland MSA is good. The *geographic distribution* of home mortgage loans is adequate while the geographic distribution of small business loans is excellent. The distribution of loans by the *income level of the borrower* in the Lakeland MSA is good. The borrower distribution of home mortgage loans is adequate while the borrower distribution of small loans to businesses is excellent.

Lending performance in the Orlando MSA is good. The *geographic distribution* of home mortgage loans is adequate while the geographic distribution of small business loans is good. The distribution of loans by the *income level of the borrower* in the Orlando MSA is good. The borrower distribution of home mortgage loans is adequate while the borrower distribution of small loans to businesses is good.

Lending performance in the Tampa MSA is excellent. The *geographic distribution* of home mortgage lending is adequate while the geographic distribution of small business lending is excellent. The distribution of loans by the *income level of the borrower* in the Tampa MSA is excellent. The borrower distribution of mortgage loans is good while borrower distribution of small business loans is excellent.

Community development lending is responsive to credit needs in the full scope AAs and has a positive impact on the lending test conclusions.

# **Lending Activity**

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

CSB has a good level of lending within the full scope AAs during the evaluation period. Lending levels reflect good responsiveness to AA credit needs. CSB's business strategy during the evaluation was growth through bank acquisitions. Lending activity in the AAs is inclusive of loans originated by banks acquired during the evaluation period.

HMDA and small business lending market share rankings compare favorably to the local deposit market share rankings in the AAs, indicating a good level of lending. This conclusion is in consideration of the performance context, economic conditions during the evaluation period, and strong competition in the AAs from other financial institutions and lenders. Lending activity for the full scope AAs is detailed below. Deposit market share is based on FDIC deposit data for June 30, 2014. Market share data for mortgages and small business loans is based on the reported volume for 2013, the most recent reporting year available.

#### Lakeland MSA

CSB has a good level of lending within the Lakeland MSA during the evaluation period. The level of home mortgage lending is good and the level of small business lending is excellent.

For deposits, CSB reported \$3.3 billion total deposits with approximately \$709 million in the Lakeland MSA representing 21.45 percent of bank deposits. Using the local deposits for the Lakeland MSA, CSB ranks 4th out of 18 financial institutions for deposits with a 12.28 percent market share. Deposit market share is dominated by large, national and regional banks, namely Wells Fargo Bank, NA, SunTrust Bank and Bank of America, NA, that rank first, second and third, and have a combined deposit market share of 51 percent.

For home purchase loans, CSB ranks 10 out of 333 HMDA reporters with 1.91 percent of the market for home purchase loans in the AA. This places CSB in the 97<sup>th</sup> percentile of home purchase lenders in the AA. In the MSA, Wells Fargo, JP Morgan Chase, MidFlorida Credit Union, Branch Banking and Trust Company, and Bank of America dominate the home purchase market with a combined market share of 33 percent. For refinance loans, CSB has a market share of 0.46 percent (by number) and ranks 31 out of 330 HMDA lenders reporting refinance loans in the AA. For home improvement loans, CSB has a home improvement market share of 3.20 percent (by number) and ranks 7 out of 65 HMDA lenders reporting home improvement loans in AA.

For small business lending, CSB's market share and rank of small loans to businesses exceeds its deposit market share and rank for a comparable period. The bank's market share of loans to small businesses is 27.46 percent (based on dollar volume) and the bank is ranked *first* of 61 lenders reporting such loans in the AA. Market share and rank are based on dollar volume of loans rather than the number of loans because of the inclusion of credit card lenders in small loans to businesses reporting.

For the evaluation period, the bank extended 11 CD loans for \$5.7 million in the Lakeland MSA. CD loans included loans for economic development, affordable housing and services to LMI individuals.

#### Orlando MSA

CSB has a good level of lending within the Orlando MSA during the evaluation period with good mortgage lending and excellent small business lending.

For deposits, CSB reported deposits totaling \$3.3 billion, with approximately \$546 million in the portion of the Orlando MSA that comprises the AA. This represents 16.52 percent of bank deposits. Using the local deposits for Orlando MSA, CSB ranks 11 out of 45 financial institutions for deposits with a 1.33 percent market share. This helps provide context to the capacity and expectations for lending levels in the AA.

For home purchase loans, CSB ranks 86 out of 588 HMDA reporters based on the number of loans originated or purchased with 0.14 percent of the market for home purchase loans in the AA. For home refinance loans, CSB ranks 109 out of 568 HMDA reporters with a 0.1 percent market share based on the number of loans originated. For home improvement loans CSB ranks 23 out of 137 HMDA reporters based on the number of loans originated, with 0.28 percent market share. These indicate good lending levels in a market dominated by large mortgage lenders.

For small business lending, CSB ranks 4 out of 114 reporters based on the number of loans originated to small businesses with a 6.45 percent market share. This represents an excellent level of lending given the size of the bank and market competition.

For the evaluation period, CSB extended six CD loans for a total of \$9.6 million in the Orlando MSA.

#### Tampa MSA

CSB has a good level of lending within the Tampa MSA during the evaluation period with adequate mortgage lending and excellent small business lending.

For deposits, CSB had a deposit market share of 0.68 percent and was ranked 16th among 58 financial institutions reporting deposits in the portion of the Tampa MSA that comprises the AA. Deposit market share is dominated by Bank of America, NA., Wells Fargo Bank, NA, and SunTrust Bank, who rank first, second, and third, respectively, and have a combined deposit market share of 30 percent.

For home purchase loans, CSB's market share (by number) is 0.25 percent, ranking the bank 68 out of 504 lenders reporting home purchase loans in the AA. For home improvement loans, the bank has a market share of 0.91 percent (by number) and is ranked 16 of 102 lenders reporting home improvement loans in the AA. For refinance loans, the bank has a market share of 0.09 percent (by number) and is ranked 87 of 428 lenders reporting refinance loans in the AA. These indicate adequate lending levels for CSB in a market dominated by large mortgage lenders.

For small business lending, CSB's market share of small business loans is 2.38 percent (based on dollar volume) and the bank is ranked 13 of 98 lenders reporting such loans in the AA.

For the evaluation period, CSB extended eight CD loans for a total of \$3.5 million in the Tampa MSA.

# Distribution of Loans by Income Level of the Geography

The geographic distribution of loans reflects good penetration throughout the full-scope AAs. Home mortgage loan geographic distribution is good. Small business loan geographic distribution is excellent. Small business loan geographic distribution was given the greatest weight in the overall geographic distribution conclusion, as it is the bank's primary lending focus. Within the home mortgage loan geographic distribution, greater weight was given to home purchase loans as CSB had a higher volume of this mortgage product compared to home improvement or home refinance loans.

#### Home Mortgage Loans

Refer to Tables 2, 3, 4 and 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.

The geographic distribution of home mortgage loans in the full-scope AAs is good.

#### Lakeland MSA

The geographic distribution of home mortgage loans in the Lakeland MSA is good. The geographic distribution of home purchase loans is adequate; the distribution of home improvement and refinance

loans is good. The conclusions are based on the penetration of mortgage loans in the moderate-income geographies of the AA. The Lakeland MSA offers limited opportunities to make mortgages in low-income census tracts, with only 1.27 percent of owner-occupied units located in the low-income census tracts in the AA. As a result, mortgage lending performance is based on penetration in the moderate-income geographies.

The geographic distribution of home purchase loans in the Lakeland MSA is adequate. The geographic distribution of home purchase loans in moderate-income census tracts is lower than the percentage of moderate-income owner-occupied units. However, the lending performance is reasonable based on the performance context as indicated in the Market Profile section of this evaluation for the Lakeland MSA. The AA continues to recover from the recent economic recession. Opportunities for mortgage lending have been limited during the evaluation period, especially to low-and moderate-income individuals due to continued high poverty levels and unemployment rates higher than state and national averages.

The geographic distribution of home improvement loans in the Lakeland MSA is good. The penetration of loans in moderate-income census tracts is lower than, the percentage of moderate-income owner-occupied units. The home improvement loan market share in moderate-income geographies is slightly lower than its overall home improvement loan market share.

The geographic distribution of home refinance loans in the Lakeland MSA is good. The penetration of loans in moderate-income census tracts is near to the percentage of moderate-income owner-occupied units, and the bank has a stronger market share for moderate-income than its overall refinance market share.

A limited number of multifamily loans are reported in the Lakeland MSA, with four loans originated for the evaluation period. However, two of the loans are secured by property in moderate-income geographies and provide for affordable LMI housing in those geographies.

#### Orlando MSA

The geographic distribution of home mortgage loans in the Orlando MSA is good. The AA offers limited opportunities to make mortgage loans in low-income census tracts, with only 0.48 percent of the AA owner-occupied units located in the low-income census tracts. As a result, lending performance is based on penetration in the moderate-income geographies.

The performance for home purchase loans in the Orlando MSA is adequate. The penetration of these loans in moderate-income census tracts is lower than the level of owner-occupied units; however, the bank's market share in moderate-income geographies is near to its overall home purchase market share.

The performance for home improvement loans in the Orlando MSA is good. The penetration of these loans in moderate-income census tracts matches the level of owner-occupied units in moderate-income geographies; the bank's market share in moderate-income geographies exceeds its overall home improvement loan market share.

The performance for home refinance loans in the Orlando MSA is excellent. The penetration of these loans in moderate-income census tracts exceeds the percentage of owner-occupied units in moderate-income geographies; the bank's market share exceeds its overall market share for home refinance loans.

A limited number of multifamily loans are reported, with three loans reported for the evaluation period. Two of the loans are secured by property in moderate-income geographies and provide for affordable housing in those geographies.

#### Tampa MSA

The geographic distribution of home mortgage loans in the Tampa MSA is good. The geographic distribution of home purchase loans is good, the distribution of home improvement loans is excellent, and the distribution of refinance loans is good.

The geographic distribution of home purchase loans in the Tampa MSA is good. The Tampa MSA offers limited opportunities to make mortgages in low-income census tract, with only 2.27 percent of owner-occupied units located in the low-income census tracts in the AA. The bank had no home purchase loans in low-income geographies. However, in moderate-income geographies, the percentage of the bank's home purchase loans exceeds the percentage of owner-occupied housing units in those geographies, and the bank's market share of home purchase loans in moderate-income geographies also exceeds its overall market share of home purchase loans.

The geographic distribution of home improvement loans in the Tampa MSA is excellent. In low-income geographies, the percentage of home improvement loans exceeds the percentage of owner-occupied housing units in those geographies, and the bank's market share of home improvement loans in low-income geographies exceeds its overall market share of home improvement loans. In moderate-income geographies, the percentage of the bank's home improvement loans exceeds the percentage of owner-occupied housing units in those geographies, and the bank's market share in moderate-income geographies also exceeds its overall market share.

The geographic distribution of home refinance loans in the Tampa MSA is good. The bank made no refinance loans in low-income geographies. In moderate-income geographies, the percentage of refinance loans exceeds the percentage of owner-occupied housing units. The bank's market share of refinance loans in moderate-income geographies also exceeds its overall market share of refinance loans.

Multifamily loans in the Tampa MSA was not meaningful for this analysis.

#### 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 in the full-scope AAs is excellent.

#### Lakeland MSA

The geographic penetration of small business loans in the Lakeland MSA is excellent. The penetration in low-income census tracts is excellent and exceeds the percentage of small businesses located in the low-income census tracts. The penetration in moderate-income census tracts is excellent and exceeds the percentage of small businesses located in the moderate-income census tracts. Small loans to businesses in low- and moderate-income census tracts exceed the overall market share for small loans to businesses in the AA.

#### Orlando MSA

The geographic penetration of small business loans in the Orlando MSA is excellent. The penetration in low-income census tracts is excellent and matches the percentage of small businesses located in the low-income census tracts. The penetration in moderate-income is excellent and exceeds the percentage of businesses located in the moderate-income census tracts of the AA.

#### Tampa MSA

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

## Lending Gap Analysis

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

#### Inside/Outside Ratio

The level of lending throughout the bank's AAs is excellent, as a substantial majority of loans originated and purchased were within its AAs. A large percentage of loans made in the AAs based on originations and purchases made during 2012, 2013, and 2014, are reported for HMDA, small business, and farm loans. In total, CSB originated and purchased 93.61 percent in total and 89.08 percent by dollar volume of loans within the AAs. For mortgage and small business loans, 95.12 percent by number and 88.24 percent by dollar volume of loans, and 92.08 percent by number and 89.58 percent by dollar volume of loans, respectively, were made within CSB's AAs.

# Distribution of Loans by Income Level of the Borrower

The borrower distribution of loans among borrowers of different income levels in the full-scope AAs is good. The borrower distribution of home mortgage loans is good and the borrower distribution of small loans to businesses is excellent. The bank's primary focus has been small business lending and therefore has the largest impact on the overall distribution by income level conclusion.

### Home Mortgage Loans

Refer to Tables 8, 9, and 10 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution for home mortgage loans in the full-scope AAs is good.

Housing prices fell drastically throughout the full-scope AAs as a result of the housing and economic recession. As prices declined, homes were more affordable but the availability of housing subsidies, particularly needed by low-income families for homeownership, was reduced. In addition, the AA poverty and unemployment rates, which were high during the evaluation period, further limited the ability of many low-income families and some moderate-income families to become homeowners, even if subsidy programs were timely and readily available. Other housing related costs, like property taxes and homeowner's insurance, remained high or continued to rise during this time and contributed to the lack of housing affordability and restricted home buying options. It should also be noted that the demand for refinance loans by low-income families is generally very limited. Low-income families have often used subsidy programs and special mortgage products for home purchases that have low interest rates or terms that make it disadvantageous to refinance. Challenges in home mortgage lending to low-income families in the AAs are discussed further in the Market Profiles in Appendix B. The performance context factors for each AA were considered in the conclusions below. The level of mortgage lending to low- or moderate-income borrowers was rated in the context of these factors.

#### Lakeland MSA

The borrower distribution of home mortgage loans in the Lakeland MSA is adequate. The distribution of home purchase loans is adequate, the distribution of home improvement loans is good, and the distribution of refinance loans is adequate.

The borrower distribution of home purchase loans to low-income and moderate-income borrowers is adequate. The bank's lending to low- and moderate-income borrowers was lower than the percentage of these families in the Lakeland MSA. However, the bank's market share for low-income borrowers was near to the overall market share of home purchase loans.

The borrower distribution of home improvement loans to low-income and moderate-income borrowers is good. The distribution to low-income borrowers is lower than the percentage of families in the AA. The distribution to moderate-income borrowers is strong and exceeds the percentage of families in the AA. The bank achieved a strong market share for moderate-income borrowers compared to the overall market share of home improvement loans.

The borrower distribution of home refinance loans to low- and moderate-income borrowers is adequate. The distribution of loans to low- and moderate-income borrowers is lower than the percentage of low- and moderate-income families in the AA. The bank's market share of loans to low- and moderate-income borrowers is also low compared to their overall market share of home refinance loans.

#### Orlando MSA

The borrower distribution for home mortgage loans in the Orlando MSA is adequate and based on good performance for home purchase loans. Performance for home improvement loans is good, although with a lower volume of loans than home purchase. For home refinance loans the performance is adequate.

The borrower distribution of home purchase loans is good. CSB's percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families in the AA. The bank's market share of home purchase loans for the low-income borrowers is also lower than the overall market share. The percentage of home purchase loans to moderate-income borrowers is near to the percentage

of moderate-income families in the geographies, while the market share for moderate-income borrowers is lower than the bank's overall market share of home purchase loans.

The distribution of refinance loans to low- and moderate-income borrowers is lower than the percentage of low- and moderate-income families in the AA and the market share is poor for both low- and moderate-income borrowers. However, the bank's overall market share for refinance loans is extremely low at 0.07 percent. CSB was not an active participant in the home refinance market in the AA. Furthermore, the performance context issues discussed above were contributing factors to low penetration in refinance loans to LMI borrowers in the AA.

#### Tampa MSA

The borrower distribution of home mortgage loans in the Tampa MSA is good. The distribution of home purchase loans is good based on the level of lending to moderate-income families. The distribution of home improvement and refinance loans is adequate. As with the other full scope AAs above, the performance context issues were contributing factors to the low levels of home mortgage loans to LMI borrowers in the Tampa MSA.

The borrower distribution of home purchase loans is good. CSB's percentage of home purchase loans to low-income borrowers is lower than the percentage of low-income families in the AA. The bank's market share of home purchase loans for the low-income borrowers is significantly below their overall market share. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the geographies. The market share for moderate-income borrowers also exceeds the bank's overall market share of home purchase loans.

The borrower distribution of home improvement loans is adequate. The bank's percentage of home improvement loans to low-income borrowers is lower than the percentage of low-income families in the AA. The bank's market share of home improvement loans for the low-income borrowers is also lower than the overall market share. The percentage of home improvement loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA. The bank's market share of home improvement loans for the low-income borrowers is below the overall market share of these loans.

The borrower distribution of home refinance loans is adequate. For refinance loans to low-income borrowers, the percentage of loans is lower than the percentage of low- income families in the assessment area. For moderate-income borrowers, the percentage of loans is near the moderate-income families in the assessment area. Despite a very small share of the overall market for refinance loans in the AA, CSB had an adequate market share for refinance loans to low-income and moderate-income borrowers.

#### 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.

The borrower distribution of small loans to businesses in the full-scope AAs is excellent. All of the full-scope AAs show strong performance based on the size of the business and the size of the loan.

#### Lakeland MSA

The borrower distribution of small loans to businesses in the Lakeland MSA is excellent. The bank's percentage of small loans (with original amounts of \$1 million or less) made to small businesses (annual revenues of \$1 million or less) is near to the percentage of small businesses (defined by annual revenues) in the AA. In addition, the bank achieved a stronger market share for small loans to small businesses than for their overall market share of small loans to businesses.

#### Orlando MSA

The borrower distribution of small loans to businesses in the Orlando MSA is excellent. The bank's percentage of small loans to small businesses exceeds the percentage of small businesses in the AA. The bank's market share of the bank's small loans to small businesses exceeded its overall market share of small loans to all businesses.

Tampa MSA

The borrower distribution of small loans to businesses in the Tampa MSA is excellent. The bank's percentage of small loans to small businesses exceeds the percentage of small businesses located in the Tampa MSA. The bank's market share of small loans to small businesses exceeds its overall market share of small loans to all businesses.

### **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 multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

#### Lakeland MSA

During the evaluation, CSB extended 11 CD loans that benefit the AA and total \$5.7 million. The level and responsiveness of CD loans has a positive impact on the lending test. CD loans helped economic development and affordable housing needs as well as provided funds to a nonprofit organization that benefit low-income individuals.

- One community development SBA 504 loan totaling \$4.2 million helped promote economic development in the AA by refinancing an existing 74-unit assisted living facility and providing additional funds for the expansion of the facility. The SBA 504 program is a financing tool for small businesses that promotes economic development and job creation. The loan allowed the business to retain and create new jobs with the addition to the facility.
- One community development loan totaling \$1.03 million was made to a nonprofit organization that provides free legal services to low-income persons.
- Nine community development loans totaling \$470 thousand helped meet the affordable housing needs in the AA. Specifically, one loan totaling \$355 thousand provided financing for a multifamily affordable housing project in a moderate-income geography in the AA. The remaining eight loans

totaling \$115 thousand were made to a nonprofit organization for working capital purposes whose primary mission is to provide affordable housing to low- and moderate-income families.

#### Orlando MSA

During the evaluation, CSB extended six CD loans that benefit the AA and total \$9.6 million. Of the total, two helped meet affordable housing needs in the AA, one was for community services targeted toward low- and moderate-income people, and three were for economic development. The level and responsiveness of CD loans is good and has a positive influence on the lending test. CD loans help meet identified economic development and affordable housing needs in the AA.

#### Tampa MSA

During the evaluation period, CSB made eight CD loans totaling \$3.5 million. Of the total, four helped meet affordable housing needs in the AA, three were for community services targeted toward low- and moderate-income people, and one was for economic development. These loans are responsive to the need for affordable housing for low- and moderate-income individuals and stabilization needs, which are both identified as needs of the assessment area by community contacts.

#### Outside the AAs: Memphis TN

One community development loan totaling \$4.25 million helped meet the affordable housing needs in Memphis, TN. The purpose of the loan was to refinance a multifamily affordable housing property that mainly serves LMI persons. The apartment complex is a project-based HUD Section 8 subsidized affordable housing property, with 78 percent, or 308 out of 396 units, targeted to low- and moderate-income families.

# **Product Innovation and Flexibility**

The bank makes use of flexible mortgage programs to help meet the credit needs of its AAs. CSB's use of these flexible programs has a positive impact on conclusions under the Lending Test.

CSB offers a First Time Homebuyer Loan product throughout all of the AAs. This flexible, fixed rate product is available for home purchase loans, including double-wide mobile homes with land, for low-and moderate-income applicants. There are no origination fees or a requirement for private mortgage insurance even though the maximum loan-to-value ratio is 97 percent. For the years 2012, 2013, and 2014, the bank closed 70 loans totaling \$3,741,222.

CSB offered other flexible loan products geared towards low-and moderate-income applicants in the AAs through the use of FHA, VA, and USDA home mortgage programs. In addition, the bank participates with the Federal Home Loan Bank (FHLB) of Atlanta's down payment assistance program offered to LMI individuals. This program requires a low initial investment from the borrower of \$1 thousand dollars matched 4 times, or \$4 thousand dollars from the FHLB. For the evaluation period, CSB originated 138 loans totaling \$12 million under these programs.

These flexible products are responsive to the AAs credit needs for affordable housing financing. Loans originated under this program are included with the bank's home purchase loans that were analyzed under other portions of the Lending Test.

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

Based on limited-scope reviews, the bank's performance under the lending test in the limited-scope AAs is not inconsistent with the bank's overall High Satisfactory performance under the lending test.

The bank's performance under the Lending Test in the Citrus County and Marion County AAs is not inconsistent with the bank's overall High Satisfactory performance under the Lending Test.

The bank's performance under the Lending Test in the Broward County, Duval County, Indian River County, Martin-Saint Lucie Counties, Sumter County, Palm Beach County, and Volusia County AAs is weaker than the bank's overall performance. Loan volume in Broward, Duval, Palm Beach, Sumter, and Volusia was significantly lower than that of the full-scope AAs and not sufficient for a meaningful analysis. There were no low-income geographies in the Sumter AA. The Broward and Palm Beach offices are new to the bank's AA since 2014, the latter part of this evaluation cycle. These AAs had a neutral impact on the bank's rating conclusion. The Martin-Saint Lucie and Indian River AAs had adequate loan volume, adequate loan performance and an neutral impact on the bank's overall rating conclusion.

The bank's performance under the Lending Test in the non-MSA AA of Hendry-Okeechobee Counties is not inconsistent with the bank's overall performance. Geographic and borrower distribution were strong for mortgage loans and small loans to businesses. This AA had a positive impact on the overall rating conclusion. The bank's performance on the non-MSA AA of Putnam County is weaker than the bank's overall performance. Loan volume was significantly lower in Putnam County than in the full-scope AAs. In addition, there are no low-income geographies in these non-MSA counties. This AA had a neutral impact on the overall rating conclusion.

Refer to Tables 1 through 13 in appendix C for the facts and data that support these conclusions.

#### INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated Low Satisfactory. Based on full-scope reviews, the bank's performance in the Lakeland MSA, Orlando, and Tampa MSAs is adequate.

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

CSB has an adequate level of qualified CD investments and grants, though none whereby the bank served in a leadership position. CSB exhibited adequate responsiveness to CD needs in the AAs. CSB made no use of complex investments to support CD initiatives in the AAs.

CSB's qualified investments were comprised almost entirely of mortgage-backed securities (MBS), where the underlying home mortgages were for properties located in low- or moderate-income geographies or for mortgages made to low- and moderate-income borrowers. Based on the structure of these MBS, each security had mortgages dispersed statewide. Therefore, the investments were quantified at the statewide/regional area that includes all of the bank's AAs. For illustrative purposes, the majority (40 percent) of the MBS allocations were for home mortgages in the Orlando MSA. The Tampa MSA represented 11 percent and the Lakeland MSA represented 7 percent of the total MBS allocation. The remainder encompassed all of the limited scope AAs, with the exception of Sumter County.

CSB also had an additional amount of \$130 thousand for grants to local community organizations.

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

Based on limited-scope reviews, the bank's performance under the investment test in the Broward County, Citrus County, Duval County, Indian River County, Marion County, Martin-Saint Lucie Counties, Volusia County and Palm Beach County AAs, and the non-MSA AAs of Hendry-Okeechobee Counties and Putnam County, is not inconsistent with the bank's overall Low Satisfactory performance.

The bank's performance under the investment test in Sumter County is weaker than the bank's overall performance. There were no qualified investments in Sumter County during the evaluation period.

#### SERVICE TEST

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

The bank's performance under the Service Test is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Lakeland MSA is good, performance in the Orlando MSA is adequate, and performance in the Tampa MSA is good. Retail banking services are good and CD services provide positive consideration for the Service Test.

### **Retail Banking Services**

Refer to Table 15 in appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

CSB's retail delivery systems are not expressly tailored to LMI geographies nor individuals. However, the bank offers a wide variety of products and services that are accessible to the bank's geographies and individuals of different income levels within its AAs. Alternative delivery systems include online banking (via desktop computer or mobile device), CSB ATMs and a 24-hour toll free phone service. Customers can also access over 28,000 surcharge-free ATMs through the Publix Supermarkets Presto! ATM network.

The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Branch services do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or LMI individuals.

CSB currently operates 58 branch locations, with four branches (6.9 percent) in low-income census tracts and twelve branches (20.69 percent) in moderate-income census tracts.

Products and services offered generally reflect the bank's business strategy. Retail products include mortgage loans and deposit products and services to the public. Banking services include a free checking account that has no monthly service charge, no minimum balance required, no per check charge and free online bill payment. Banking lobbies are open Monday through Friday from 9AM to 4PM. Drive-through hours are 8AM to 6PM. Customers can also access online banking services and the 24-hour toll free phone service.

CSB has 12 branches in the Lakeland MSA, of which one (8.33 percent) is located in a low-income geography and three (25 percent) are located in moderate-income geographies. All locations are full service branches with ATM and drive-through facilities. The branch distribution compares favorably to the population distribution, based on the percentage of the AA population residing in each geographic category.

CSB has 11 branches in the Orlando MSA, of which three (27 percent) are located in a moderate-income geography. There are no branches located in low-income geographies in the Orlando MSA. All locations are full service branches with ATM and drive-through facilities. The branch distribution in moderate-income geographies compares favorably to the population distribution of the AA.

CSB has 12 branches in the Tampa MSA, of which one (14.28 percent) is located in a low-income geography and two (28.57 percent) are located in moderate-income geographies. All locations are full

service branches with ATM and drive-through facilities. The branch distribution compares favorably to the population distribution of the AA.

### **Community Development Services**

The bank provides an adequate level of community development services given its size and capacity to provide such services. The bank's performance in the full scope AAs of Lakeland MSA, Orlando MSA and Tampa MSA is adequate.

Bank personnel have engaged in community development services that are generally responsive to community needs. There were thirty CD service activities during the evaluation period in the full scope AAs. Activities include service on the boards of local organizations with a primary purpose of community development. Bank personnel also provided technical assistance by serving on the finance committees of loan approval committees for affordable housing organizations that predominately serve LMI. Bank personnel also participated in financial literacy workshops for low-income residents in the AA. The majority of CD service activity for the evaluation period occurred in the Lakeland MSA and Orlando MSA. In Lakeland, the service was primarily board membership on community service, affordable housing, and economic development organizations that predominantly serve LMI in Polk County. The service activity in the Orlando MSA was very similar, with committee and board membership on community development organizations that predominantly serve LMI residents in the AA. There was a lower level of service activity in the Tampa MSA; however, the activity was of a similar nature.

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

Based on limited-scope reviews, the bank's performance under the investment test in the Broward County, Citrus County, Duval County, Indian River County, Marion County, Martin-Saint Lucie Counties, Volusia County, and Palm Beach County AAs; and the non-MSA AAs of Hendry-Okeechobee Counties and Putnam County, is not inconsistent with the bank's overall Low Satisfactory performance. Refer to Table 15 in appendix C for the facts and data that support these conclusions.

# **Appendix A: Scope of Examination**

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

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/12 to 12/31/14) Investment and Service Tests and CD Loans: (03/06/12 to 04/06/15)				
Financial Institution		Products Reviewed Small business loans, home mortgages, CD loans, CD investments, and retail and CD services			
CenterState Bank of Florida, NA (CSB) 1101 First Street South Winter Haven, FL 33880					
Affiliate(s)	Affiliate Relationship	Products Reviewed			
None		N/A			
List of Assessment Areas and Type of Exam	mination				
Assessment Area	Type of Exam	Other Information			
MSA 29460 Lakeland MSA 36740 Orlando MSA 45300 Tampa MD 22744- Broward County MD 48424- Palm Beach County MSA 19660- Volusia County MSA 26140- Citrus County MSA 27260- Duval County MSA 36100- Marion County MSA 38940 Martin-St Lucie Counties MSA 42680- Indian River County MSA 45540- Sumter County (The Villages) NonMSA Hendry-Okeechobee Counties NonMSA-Putnam County	Full Scope Full Scope Full Scope Limited Scope	N/A N/A Partial MSA = Hillsborough, Pasco and Pinellas Counties only Limited Scope Limited Scope Partial MSA = Volusia County only Limited Scope Partial MSA = Duval County only Limited Scope			

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

#### Lakeland MSA

Demographic Information for Full Scope Area: 29460 MSA Lakeland							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts/BNAs)	154	3.25	23.38	49.35	23.38	0.65	
Population by Geography	602,095	2.08	23.27	52.70	21.96	0.00	
Owner-Occupied Housing by Geography	161,208	1.27	19.20	54.65	24.88	0.00	
Business by Geography	62,999	4.27	19.88	50.30	25.55	0.00	
Farms by Geography	2,463	1.91	21.23	50.95	25.90	0.00	
Family Distribution by Income Level	157,222	20.25	18.65	20.75	40.35	0.00	
Distribution of Low and Moderate Income Families throughout AA Geographies	61,160	3.25	33.03	50.65	13.07	0.00	
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		51,395 51,000 14%	Median Housing Value Unemployment Rate (April 2010 BLS)		138,997 12.1%		

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

Source: 2010 US Census and 2013 HUD updated MFI

CenterState Bank, NA (CSB) AA is Polk County, which wholly comprises the Lakeland-Winter Haven MSA 29460 (Lakeland MSA). The AA contains 154 census tracts and has a total population of 602,095 persons. Of this population, there are 157,222 families residing in the AA. The AA meets the legal requirements of CRA and does not arbitrarily exclude low- or moderate-income geographies. CSB has 12 branch offices located in the AA. Out of the 12 branch locations, 1 is located in a low-income census tract (Lake Wales), 3 are located in moderate-income census tracts, 7 are located in middle-income census tracts, and 1 is located in upper-income census tracts.

Banking competition in the AA is strong, with community banks, regional banks, large national banks, and credit unions operating in the market. Data from the FDIC Deposit Market Share Report as of June 30, 2014 shows there are 18 banks and savings institutions operating 129 offices in the MSA. The top five banks hold approximately 70 percent of the deposits in the county. CSB ranked fourth with a deposit market share of 12.28 percent. Other leading banks in the AA are Wells Fargo, NA, SunTrust Bank and Bank of America, NA.

#### Employment & Economic Data

Data from the Bureau of Labor Statistics (BLS) shows that from February 2012 to February 2015, unemployment rates for Lakeland MSA decreased significantly, from 10.0 percent to 6.3 percent as the economy has recovered. The February 2015 rate is slightly higher than the state average of 5.6 percent and the national average of 5.5 percent. The analysis of the AA's are based on the 2013 median family income (MFI) listed in the table above, and the 2014 MFI for the Lakeland MSA, as estimated by the Federal Financial Institutions Examination Council (FFIEC), which decreased to \$50,400. Approximately 14 percent of all households in the AA live below the poverty level.

Leisure and hospitality job growth will outstrip that of nearly every other industry over the next few years. Favored by vacationers for its proximity to Tampa and Orlando, the Lakeland MSA became a tourist destination in its own right with the opening of Legoland Florida in 2011. The park added a 150-unit hotel in the spring of 2015. Although hiring in leisure and hospitality has slowed, the industry will remain a steady source of job growth in the coming years, bolstered by new attractions in Tampa and Orlando. Moody's Analytics, as of November 2014, reports the major business and industry sectors in Polk County are Trade, Transportation and Utilities (24.4 percent), Education and Health Services (15.2 percent), and Professional and Business Services (13.3 percent). Major employers are Publix Supermarkets (headquartered in Lakeland), Wal-Mart, MOSAIC, and Lakeland Regional Medical Center.

### **Housing**

According to data from the 2013 American Community Survey, the AA has 214,500 occupied housing units and 65,413 vacant housing units. Of these, 69.0 percent are 1-4 family units and 22.6 percent are mobile homes and trailers. Owner-occupied units comprise 68.6 percent of occupied units in the AA, a decline from 71.4 percent in 2009. The median housing value in 2013 was \$138,997. According to Zillow, the estimated median home value in Polk County, as of March 2015, was \$128 thousand, a 10.8 percent increase from the same period in 2014. Zillow projects home values to increase 4.4 percent in the AA over the next year.

Home foreclosures and short sales have dramatically affected the housing market in the Lakeland MSA. Despite a spike in early 2014, foreclosure activity has slowed, helping to work off a backlog of inventory. Yet the still-high level of distressed properties, roughly three times that of the U.S., is a significant source of risk, putting downward burden on prices over the next few years. RealtyTrac.com indicates that, as of March 2015, 1 in 341 housing units were in some stage of foreclosure compared to 1 in 446 for the state of Florida, and 1 in 1082 units in the U.S. The average monthly rent is \$1,075.

#### **Community Contact**

During this evaluation, we contacted one community development organization (CDO) from the Lakeland MSA. The community contacts provided an assessment of the community's needs, opportunities in which financial institutions may participate in meeting those needs and information on the perception of financial institutions involvement in the community. Credit needs noted by the CDO include access to capital, particularly for startup businesses. Financial literacy counseling for individuals and business owners was also cited as needed in the community.

#### Orlando MSA

Demographic Information for Full Scope Area: 36740 MSA Orlando							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts/BNAs)	389	2.06	27.25	39.33	31.11	0.26	
Population by Geography	2,134,411	1.09	26.67	41.33	30.90	0.01	
Owner-Occupied Housing by Geography	505,982	0.48	20.03	43.77	35.71	0.01	
Business by Geography	330,368	0.63	23.67	38.68	37.00	0.02	
Farms by Geography	7,782	0.58	20.25	46.02	33.02	0.13	
Family Distribution by Income Level	521,311	20.08	18.64	20.77	40.51	0.00	
Distribution of Low and Moderate Income Families throughout AA Geographies	201,865	1.82	39.02	42.17	16.98	0.01	
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		58,474 58,500 12%	Unem	Housing Value ployment Rate April 2010 BLS)	224,608 11.4%		

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

Source: 2010 US Census and 2013 HUD updated MFI

Orange, Lake, Osceola and Seminole counties make up the Orlando-Kissimmee-Sanford MSA 36740 (Orlando MSA). The CSB AA comprises the entire MSA, which contains 389 census tracts with a total population of 2,134,411 persons. Of this population, there are 521,311 families residing in the AA. The AA meets the legal requirements of CRA and does not arbitrarily exclude low- or moderate-income geographies.

CSB has 11 branch offices located in the AA. Three branches each are located in Orange and Lake County, four in Osceola, and the remaining branch is located in Seminole County. Out of the 11 branch locations, 3 are located in a moderate-income census tract, 4 are located in middle-income census tracts, and 4 are located in upper-income census tracts. CSB closed a branch in Clermont for efficiency in April 2014. In addition, six offices held for a short time post-acquisition were sold or closed in 2014. These locations include Lake Mary, Winter Garden, Winter Park, Edgewood, Kissimmee, and St. Cloud.

Banking competition in the AA is strong with community banks, regional banks, large national banks, and credit unions operating in the market. Data from the FDIC Deposit Market Share Report as of June 30, 2014, shows there are 45 banks and savings institutions operating 584 offices in the MSA. The top five banks hold approximately 71 percent of the deposits in the counties. CSB ranked 11th with a deposit market share of 1.33 percent. Leading banks in the AA are SunTrust Bank, Bank of America, NA, and Wells Fargo, NA.

#### Employment & Economic Data

Data from the Bureau of Labor Statistics (BLS) shows that from February 2012 to February 2015, unemployment rates for Orlando MSA counties decreased significantly, from 9.1 percent to 5.3 percent as the economy has recovered. The February 2015 rate is slightly lower than the state average of 5.6 percent and the national average of 5.5 percent. The analysis of the AA's are based on the 2013 MFI listed in the table above, and the 2014 MFI for the Orlando MSA, as estimated by the Federal Financial

Institutions Examination Council (FFIEC), was \$54,800. Approximately 12 percent of all households in the AA live below the poverty level.

The Metro Orlando area is the 31st largest metropolitan area in the United States and boasts a gross domestic product (GDP) of more than \$110 billion, according to the Bureau of Economic Analysis. The metro area's economy benefits from a globally recognized tourism industry, Orlando's aerospace and defense sector, biotechnology industry, and digital media sector. Tourism continues to be the major industry, annually drawing millions of visitors to the MSA and results in large leisure, hospitality, and retail sectors. Job growth has been concentrated in low-paying hospitality and administrative jobs. These positions make up more than half of the new jobs created in the last year, and their outsized growth has left average weekly wages unchanged over that period. Moody's Analytics, as of November 2014, reports the major business and industry sectors in the Orlando metro area are Leisure and Hospitality (20.6 percent), Professional & Business Services (16.5 percent), Retail Trade (12.4 percent), and Education and Health Services (12.3 percent). Major private-sector employers are Walt Disney World, Publix Super Markets, Florida Hospital, Universal Orlando Resort, Wal-Mart, and Lockheed Martin.

### **Housing**

According to data from the 2013 American Community Survey, the AA has 780,174 occupied housing units and 178,124 vacant housing units. Owner-occupied units comprise 60.7 percent of occupied units in the AA, a decline from 66.1 percent in 2009. The median housing value in 2013 was \$151,700. Zillow projects home values to increase between 2.6 and 4.5 percent in the counties that make up the AA.

Home foreclosures and short sales have dramatically influenced the housing market in the Orlando MSA. According to the Florida Association of Realtors, year-over-year sales of single-family homes rose just 3 percent in the third quarter of 2014, less than half of Florida's growth rate, and the median sale price rose 5 percent, only slightly faster than the statewide pace. RealtyTrac.com indicates that, as of March 2015, three of the four counties that comprise the Orlando MSA have lower rates of foreclosure than the overall rate for the State of Florida. However, all four counties and the State of Florida have rates far above the national average. The average monthly rent is \$1,200.

#### **Community Contact**

During the evaluation period, we contacted one community development organization (CDO) from the Orlando MSA. The community contacts provided an assessment of the community's needs, opportunities in which financial institutions may participate in meeting those needs and information on the perception of financial institutions involvement in the community. Credit needs noted by the CDO include loans for home repairs to the aging-housing stock as well as small business loans to support local entities.

### Tampa MSA

Demographic Information for Limited Scope Area: 45300 MSA Tampa							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts/BNAs)	497	5.63	27.97	38.63	26.16	1.61	
Population by Geography	1,866,701	4.47	27.34	37.92	29.99	0.28	
Owner-Occupied Housing by Geography	496,912	2.27	25.35	40.36	32.02	0.00	
Business by Geography	246,801	3.73	24.19	35.69	36.16	0.23	
Farms by Geography	6,523	2.16	24.90	40.78	32.15	0.02	
Family Distribution by Income Level	468,611	21.45	18.60	19.19	40.76	0.00	
Distribution of Low and Moderate Income Families throughout AA Geographies	187,670	7.35	39.54	37.49	15.62	0.00	
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		57,333 56,800 13%	Unem	Housing Value apployment Rate April 2010 BLS)	191,220 11.9%		

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2013 HUD updated MFI

Hillsborough, Pinellas, Pasco, and Hernando counties make up the Tampa-St. Petersburg-Clearwater MSA 45300 (Tampa MSA). The CSB AA comprises Hillsborough, Pasco, and Hernando counties, which contains 497 census tracts with a total population of 1,866,701 persons. Of this population, there are 468,611 families residing in the AA. The AA meets the legal requirements of CRA and does not arbitrarily exclude low- or moderate-income geographies.

CSB has seven branch offices and a loan production office (Tampa) located in the AA. Four branches are located in Hillsborough County, two in Pasco County, and the remaining branch is located in Hernando County. Out of the seven branch locations, one is located in a low-income census tract, two are located in moderate-income census tracts, three are located in middle-income census tracts, and the remaining one is located in an upper-income census tract. CSB closed one branch in Lithia for efficiency in April 2014.

Banking competition in the AA is strong, with community banks, regional banks, large national banks, and credit unions operating in the market. Data from the FDIC Deposit Market Share Report as of June 30, 2014 shows there are 58 banks and savings institutions operating 454 offices in the AA. The top five banks hold approximately 68.3 percent of the deposits in the counties. CSB ranked sixteenth with a deposit market share of 0.68 percent. Leading banks in the AA are Bank of America, NA, Wells Fargo, N.A and SunTrust Bank.

#### Employment & Economic Data

Data from the Bureau of Labor Statistics (BLS) shows that from February 2012 to February 2015, unemployment rates for Tampa MSA counties decreased significantly, from 9.4 percent to 5.5 percent as the economy has recovered. The February 2015 rate is slightly lower than the state average of 5.6 percent and matches the national average. The analysis of the AA's are based on the 2013 MFI listed in the table above, and the 2014 MFI for the Tampa MSA, as estimated by the Federal Financial

Institutions Examination Council (FFIEC), was \$57,400. Approximately 13 percent of all households in the AA live below the poverty level.

The AA has always enjoyed a diversified economy and is not highly dependent on tourism, although it is a factor. This diversification makes this AA's economy prone to business cycle volatility due to its heavy concentration in services such as call centers, human resources, accounting, and back-office operations. Currently, these areas are responsible for a strong recovery in the metro area because of its specialized workforce. Tampa is home to U.S. Central Command and the Tampa Bay region has been called the "Wall Street South" for the size and scope of its financial services industry. Financial service organizations that have a major presence in the Tampa Bay Area include JP Morgan Chase, Citigroup, and Bank of America.

Healthcare is also an important part of the Tampa Bay regional economy and known for its hospitals and medical research and education programs. The area is also part of the gateway to the Florida High Tech Corridor, a 23-county area that is home to more than 3,000 high-tech companies.

Moody's Analytics, as of November 2014, reports the major business and industry sectors in the Tampa metro area are Professional & Business Services (17.0 percent), Education and Health Services (15.7 percent), Government (12.9 percent), and Retail Trade (12.4 percent). Major employers in the AA include MacDill Air Force Base, Verizon Communications, and the University of South Florida, with more than 45 thousand employees combined.

#### **Housing**

According to data from the 2013 American Community Survey, the AA has 738,726 occupied housing units and 122,033 vacant housing units. Owner-occupied units comprise 62.9 percent of occupied units in the AA, a decline from 67.2 percent in 2009. The median housing value in 2013 was \$191,220. Zillow projects home values to increase between 2.1 and 4.5 percent in the counties that make up the AA.

Home foreclosures and short sales have dramatically influenced the housing market in the Tampa MSA. According to the Florida Association of Realtors, in the third quarter of 2014, year-over-year single-family home sales were up just 4 percent, about half the statewide rate, and the median sale price fell 9 percent, which is easily Florida's biggest drop. RealtyTrac.com indicates that, as of March 2015, 1 in 389 housing units in Hillsborough County, 1 in 327 units in Hernando County and 1 in 408 units in Pasco County were in some stage of foreclosure compared to 1 in 446 for the state of Florida, and 1 in 1,082 units in the United States. The average monthly rent is \$1,200.

### **Community Contact**

During the evaluation period, we contacted one community development organization (CDO) from the Tampa MSA. The community contacts provided an assessment of the community's needs, opportunities in which financial institutions may participate in meeting those needs and information on the perception of financial institutions involvement in the community. Credit needs noted by the CDO include access to capital for start-up businesses.

# **Appendix C: Tables of Performance Data**

#### **Content of Standardized Tables**

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

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

- **Table 1.** Lending Volume Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank's assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) 5 and 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- **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/AA. 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.

**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 upperincome 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 1. Lending Volume

LENDING VOLUME		Ge	eography: FLORID <i>i</i>	4	Evaluatio	<b>n Period</b> : J <i>A</i>	ANUARY 1, 2012	TO DECEME	BER 31, 2014			
(0.10)	% of Rated Area Loans (#) in MA/AA*	Hon	ne Mortgage		II Loans to sinesses	Small Loa	ans to Farms		y Development pans**	Total Repo	orted Loans	% of Rated Area Deposits in MA/AA***
Assessment Area (2013):		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:		•	, , ,		, ,	•	, , ,		, , ,		, ,	•
MSA 29460- Lakeland	32.66	760	76,789	524	92,327	17	3,628	11	5,727	1,312	178,471	21.45
MSA 36740-Orlando	15.62	297	41,628	321	71,664	4	294	6	9,570	628	123,156	16.52
MSA 45300 Tampa	15.05	301	23,947	288	48,702	8	1,569	8	3,511	605	77,729	6.84
Limited Review:												
MD 22744- Broward County	0.80	3	1,690	20	9,452	2	177	7	6,219	32	17,538	6.57
MD 48424- Palm Beach County	2.31	12	4,504	78	15,969	0	0	3	15,950	93	36,423	12.53
MSA 19660- Volusia County	1.74	58	3,584	10	1,647	0	0	2	252	70	5,483	2.15
MSA 26140- Citrus County	2.16	33	2,579	53	5,426	0	0	1	60	87	8,065	0.00
MSA 27260- Duval County	3.23	36	13,527	87	15,343	0	0	7	63,270	130	92,140	7.44
MSA 36100- Marion County	6.24	126	14,654	119	17,420	5	524	1	13	251	32,611	5.84
MSA 38940 Martin-St Lucie Counties	5.70	49	13,127	170	29,236	8	1,026	2	2,250	229	45,639	11.50
MSA 42680- Indian River County	6.89	131	26,338	140	21,481	6	1,145	0	0	277	48,964	2.21
MSA 45540- Sumter County	1.92	32	1,755	42	8,027	2	395	1	1,305	77	11,482	1.21
NonMSA Hendry-Okeechobee Counties	4.30	123	10,499	32	6,088	16	2,745	2	2	173	19,334	3.42
NonMSA-Putnam County	1.37	45	1,488	10	1,563	0	0	0	0	55	3,051	2.33

<sup>\*</sup>Loan Data as of December 31, 2014. Rated area refers to either state or multi-state MA rating area.

The evaluation period for Community Development Loans is from March 05, 2012 to April 06, 2015.

Deposit Data as of June 30, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 1. Other Products** 

LENDING VOLUME			Geography	: FLORIDA	1	Evaluatio	n Period: JANU	ARY 1, 2012	TO DECEMBE	R 31, 2014				
	% of Rated Area Loans	Total Opti	onal Loans**		siness Real Secured**	Hom	e Equity**	Motor \	Vehicle**	Credi	t Card**		Secured sumer**	% of Rated
Assessment Area (2013):	(#) in MA/AA*	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	Area Deposits in AA***
Full Review:										•				•
MSA 29460- Lakeland	0.00	0	0	0	0	0	0	0	0	0	0	0	0	21.45
MSA 36740-Orlando	0.00	0	0	0	0	0	0	0	0	0	0	0	0	16.52
MSA 45300 Tampa	0.00	0	0	0	0	0	0	0	0	0	0	0	0	6.84
Limited Review:							'				'		•	
MD 22744- Broward County	0.00	0	0	0	0	0	0	0	0	0	0	0	0	6.57
MD 48424- Palm Beach County	0.00	0	0	0	0	0	0	0	0	0	0	0	0	12.53
MSA 19660- Volusia County	0.00	0	0	0	0	0	0	0	0	0	0	0	0	2.15
MSA 26140- Citrus County	0.00	0	0	0	0	0	0	0	0	0	0	0	0	0.00
MSA 27260- Duval County	0.00	0	0	0	0	0	0	0	0	0	0	0	0	7.44
MSA 36100- Marion County	0.00	0	0	0	0	0	0	0	0	0	0	0	0	5.84
MSA 38940 Martin-St Lucie Counties	0.00	0	0	0	0	0	0	0	0	0	0	0	0	11.50
MSA 42680- Sebastian County	0.00	0	0	0	0	0	0	0	0	0	0	0	0	2.21
MSA 45540- Sumter County (The Villages)	0.00	0	0	0	0	0	0	0	0	0	0	0	0	1.21
NonMSA Hendry-Okeechobee Counties	0.00	0	0	0	0	0	0	0	0	0	0	0	0	3.42
NonMSA-Putnam County	0.00	0	0	0	0	0	0	0	0	0	0	0	0	2.33

<sup>\*</sup>Loan Data as of December 31, 2014. Rated area refers to either state or multi-state MA rating area.

The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2014.

Deposit Data as of June 30, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Other Products

LENDING VOLUME	Geography: FL	ORIDA <b>Evaluation Period</b> : JANU	JARY 1, 2012 TO DECEMBER 31, 2014	
	Other Unsecured	Consumer Loans*	Other Option	nal Loans*
Assessment Area (2013):	#	\$ (000's)	#	\$ (000's)
Full Review:				
MSA 29460- Lakeland	0	0	0	
MSA 36740-Orlando	0	0	0	
MSA 45300 Tampa	0	0	0	
Limited Review:				
MD 22744- Broward County	0	0	0	
MD 48424- Palm Beach County	0	0	0	
MSA 19660- Volusia County	0	0	0	
MSA 26140- Citrus County	0	0	0	
MSA 27260- Duval County	0	0	0	
MSA 36100- Marion County	0	0	0	
MSA 38940 Martin-St Lucie Counties	0	0	0	
MSA 42680- Indian River County	0	0	0	
MSA 45540- Sumter County (The Villages)	0	0	0	
NonMSA Hendry-Okeechobee Counties	0	0	0	
NonMSA-Putnam County	0	0	0	

 $<sup>\</sup>dot{}$  The evaluation period for Optional Product Line(s) is from January 01, 2012 to December 31, 2014.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME	PURCHASE		(	Geography: FL	ORIDA	Evalu	ation Period:	January 1, 2	012 TO DECE	MBER 31, 2014	1				
	Total Home		Low-Income	Geographies	Moderate Geogr	e-Income aphies	Middle- Geogra		Upper- Geogra	Income aphies	M	arket Sha	re (%) by	Geograph	hy*
Assessment Area:	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:	•							•					·		
MSA 29460- Lakeland MSA	506	40.29	1.27	0.59	19.20	11.07	54.65	69.96	24.88	18.38	2.09	0.00	1.77	2.50	1.50
MSA 36740-Orlando MSA	193	15.37	0.48	0.00	20.03	13.47	43.78	67.88	35.71	18.65	0.21	0.00	0.27	0.30	0.09
MSA 45300 Tampa	199	15.84	2.27	0.00	25.35	37.69	40.36	50.25	32.02	12.06	0.25	0.00	0.65	0.31	0.07
Limited Review:													I		
MD 22744- Broward County	0	0.00	1.73	0.00	27.32	0.00	37.11	0.00	33.84	0.00	0.00	0.00	0.00	0.00	0.00
MD 48424- Palm Beach County	6	0.48	2.96	0.00	22.08	0.00	36.12	50.00	38.83	50.00	0.01	0.00	0.00	0.01	0.00
MSA 19660- Volusia County	44	3.50	1.29	0.00	15.68	9.09	54.75	56.82	28.28	34.09	0.09	0.00	0.28	0.06	0.08
MSA 26140- Citrus County	17	1.35	0.00	0.00	10.98	11.76	72.63	82.35	16.39	5.88	0.38	0.00	0.00	0.46	0.29
MSA 27260- Duval County	14	1.11	4.76	0.00	20.61	0.00	42.35	57.14	32.28	42.86	0.06	0.00	0.00	0.09	0.04
MSA 36100- Marion County	63	5.02	0.00	0.00	13.04	12.70	73.07	69.84	13.89	17.46	0.59	0.00	0.28	0.62	0.65
MSA 38940 Martin-St Lucie Counties	27	2.15	1.02	7.41	14.71	7.41	57.46	55.56	26.81	29.63	0.03	0.00	0.23	0.02	0.00
MSA 42680- Indian River County	85	6.77	1.08	1.18	11.88	15.29	58.73	48.24	28.31	35.29	1.82	0.00	2.82	1.29	2.56
MSA 45540- Sumter County (The Villages)	11	0.88	0.00	0.00	5.43	0.00	69.83	100.00	24.74	0.00	0.09	0.00	0.00	0.45	0.00
NonMSA Hendry-Okeechobee Counties	84	6.69	0.00	0.00	30.50	35.71	60.39	46.43	9.11	17.86	6.16	0.00	8.93	4.78	6.98
NonMSA-Putnam County	7	0.56	0.00	0.00	23.98	28.57	58.28	71.43	17.75	0.00	0.98	0.00	1.49	1.20	0.00

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

"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 2010 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOM	IE IMPROVE	MENT		Geogr	aphy: FLORID	A	Evaluation	Period: JANU	ARY 1, 2012 TC	DECEMBER	31, 2014				
	Total I		Low-Income	Geographies	Moderate Geogr	e-Income aphies	Middle- Geogra		Upper-I Geogra		N	Market Sha	are (%) by	Geography	*
Assessment Area:	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:	•		•										'		
MSA 29460- Lakeland	93	34.32	1.27	0.00	19.20	16.13	54.65	58.06	24.88	25.81	5.89	0.00	4.49	6.50	5.63
MSA 36740-Orlando	35	12.92	0.48	0.00	20.03	20.00	43.78	71.43	35.71	8.57	0.83	0.00	2.22	0.88	0.17
MSA 45300 Tampa	37	13.65	2.27	2.70	25.35	37.84	40.36	32.43	32.02	27.03	0.91	2.70	0.75	0.81	1.02
Limited Review:	1														
MD 22744- Broward County	0	0.00	1.73	0.00	27.32	0.00	37.11	0.00	33.84	0.00	0.00	0.00	0.00	0.00	0.00
MD 48424- Palm Beach County	1	0.37	2.96	0.00	22.08	0.00	36.12	0.00	38.83	100.00	0.00	0.00	0.00	0.00	0.00
MSA 19660- Volusia County	3	1.11	1.29	0.00	15.68	0.00	54.75	33.33	28.28	66.67	0.40	0.00	0.00	0.00	1.46
MSA 26140- Citrus County	8	2.95	0.00	0.00	10.98	12.50	72.63	62.50	16.39	25.00	1.94	0.00	0.00	1.36	5.41
MSA 27260- Duval County	5	1.85	4.76	0.00	20.61	0.00	42.35	40.00	32.28	60.00	0.12	0.00	0.00	0.00	0.33
MSA 36100- Marion County	20	7.38	0.00	0.00	13.04	25.00	73.07	35.00	13.89	40.00	1.20	0.00	2.04	0.44	3.33
MSA 38940 Martin-St Lucie Counties	6	2.21	1.02	0.00	14.71	16.67	57.46	16.67	26.81	66.67	0.00	0.00	0.00	0.00	0.00
MSA 42680- Indian River County	7	2.58	1.08	14.29	11.88	28.57	58.73	28.57	28.31	28.57	2.61	0.00	9.09	0.00	6.06
MSA 45540- Sumter County (The Villages)	10	3.69	0.00	0.00	5.43	0.00	69.83	100.00	24.74	0.00	1.74	0.00	0.00	2.99	0.00
NonMSA Hendry-Okeechobee Counties	13	4.80	0.00	0.00	30.50	38.46	60.39	38.46	9.11	23.08	14.63	0.00	25.00	0.00	25.00
NonMSA-Putnam County	33	12.18	0.00	0.00	23.98	15.15	58.28	57.58	17.75	27.27	27.27	0.00	20.00	28.57	27.27

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

" 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 2010 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME	MORTGAGE	REFINANCE	- - -	Ge	eography: FLORIE	PΑ	Evaluation I	Period: JANUA	RY 1, 2012 7	TO DECEMBE	R 31, 2014				
	Total Home Refinance			ncome raphies	Moderate- Geogra		Middle-li Geogra			-Income raphies	Ma	arket Share	e (%) by G	Geography	
Assessment Area:	#	% of Total <sup>**</sup>	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 29460- Lakeland	157	34.06	1.27	0.00	19.20	18.47	54.65	54.14	24.88	27.39	0.67	0.00	1.52	0.67	0.40
MSA 36740-Orlando	65	14.10	0.48	0.00	20.03	29.23	43.78	47.69	35.71	23.08	0.07	0.00	0.17	0.09	0.0
MSA 45300 Tampa	64	13.88	2.27	0.00	25.35	39.06	40.36	40.63	32.02	20.31	0.09	0.00	0.27	0.08	0.0
Limited Review:					•										
MD 22744- Broward County	2	0.43	1.73	0.00	27.32	0.00	37.11	50.00	33.84	50.00	0.00	0.00	0.00	0.00	0.0
MD 48424- Palm Beach County	5	1.08	2.96	0.00	22.08	0.00	36.12	20.00	38.83	80.00	0.00	0.00	0.00	0.00	0.00
MSA 19660- Volusia County	11	2.39	1.29	0.00	15.68	0.00	54.75	54.55	28.28	45.45	0.03	0.00	0.00	0.04	0.0
MSA 26140- Citrus County	7	1.52	0.00	0.00	10.98	28.57	72.63	71.43	16.39	0.00	0.29	0.00	1.24	0.27	0.0
MSA 27260- Duval County	12	2.60	4.76	0.00	20.61	0.00	42.35	41.67	32.28	58.33	0.03	0.00	0.00	0.02	0.04
MSA 36100- Marion County	43	9.33	0.00	0.00	13.04	9.30	73.07	69.77	13.89	20.93	0.30	0.00	0.47	0.29	0.2
MSA 38940 Martin-St Lucie Counties	14	3.04	1.02	21.43	14.71	7.14	57.46	42.86	26.81	28.57	0.07	13.33	0.00	0.05	0.04
MSA 42680- Indian River County	39	8.46	1.08	2.56	11.88	5.13	58.73	38.46	28.31	53.85	0.82	7.14	0.00	0.56	1.3
MSA 45540- Sumter County (The Villages)	11	2.39	0.00	0.00	5.43	0.00	69.83	90.91	24.74	9.09	0.20	0.00	0.00	0.54	0.0
NonMSA Hendry-Okeechobee Counties	26	5.64	0.00	0.00	30.50	46.15	60.39	42.31	9.11	11.54	1.42	0.00	1.72	1.64	0.00
NonMSA-Putnam County	5	1.08	0.00	0.00	23.98	40.00	58.28	60.00	17.75	0.00	0.40	0.00	1.27	0.33	0.00

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

" 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 2010 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTI	FAMILY			Geography: F	FLORIDA	Eval	uation Period:	JANUARY 1, 20	012 TO DECEM	/IBER 31, 2014					
		Multifamily Dans	Low-Income	Geographies		e-Income raphies		-Income raphies	Upper- Geogr	Income aphies	Mai	rket Share	(%) by Ge	ography	k
Assessment Area:	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:						I I									
MSA 29460- Lakeland	4	23.53	9.12	0.00	22.51	50.00	50.71	25.00	17.66	25.00	11.11	0.00	50.00	5.00	25.0
MSA 36740-Orlando	3	17.65	1.83	0.00	41.59	66.67	39.49	33.33	17.08	0.00	3.33	0.00	5.13	2.70	0.0
MSA 45300 Tampa	1	5.88	6.65	0.00	33.38	0.00	35.54	100.00	24.43	0.00	0.00	0.00	0.00	0.00	0.0
Limited Review:															
MD 22744- Broward County	1	5.88	4.53	0.00	36.14	0.00	41.64	0.00	17.69	100.00	0.00	0.00	0.00	0.00	0.0
MD 48424- Palm Beach County	0	0.00	6.39	0.00	31.55	0.00	33.58	0.00	28.47	0.00	0.00	0.00	0.00	0.00	0.00
MSA 19660- Volusia County	0	0.00	7.93	0.00	27.19	0.00	37.17	0.00	27.72	0.00	0.00	0.00	0.00	0.00	0.00
MSA 26140- Citrus County	1	5.88	0.00	0.00	10.93	0.00	72.07	0.00	17.00	100.00	0.00	0.00	0.00	0.00	0.00
MSA 27260- Duval County	5	29.41	7.19	0.00	35.26	20.00	32.41	60.00	25.14	20.00	0.00	0.00	0.00	0.00	0.00
MSA 36100- Marion County	0	0.00	0.00	0.00	25.93	0.00	45.07	0.00	29.00	0.00	0.00	0.00	0.00	0.00	0.00
MSA 38940 Martin-St Lucie Counties	2	11.76	1.24	0.00	19.26	0.00	41.19	100.00	38.31	0.00	0.00	0.00	0.00	0.00	0.00
MSA 42680- Indian River County	0	0.00	5.15	0.00	12.59	0.00	44.81	0.00	37.45	0.00	0.00	0.00	0.00	0.00	0.0
MSA 45540- Sumter County (The Villages)	0	0.00	0.00	0.00	43.05	0.00	56.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0
NonMSA Hendry-Okeechobee Counties	0	0.00	0.00	0.00	34.61	0.00	62.73	0.00	2.66	0.00	0.00	0.00	0.00	0.00	0.0
NonMSA-Putnam County	0	0.00	0.00	0.00	18.87	0.00	38.99	0.00	42.14	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily NonMSA-Putnam County loan distribution includes Home Purchases, Home Improvement and Refinances.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMAL	L LOANS TO	BUSINES:	SES	(	Geography: FLO	RIDA	Evaluat	ion Period:	January 1, 20°	12 TO DECE	MBER 31, 2	014			
	Total S Business		Low-Inco Geograph		Moderate- Geogra		Middle-In Geograp		Upper-Ind Geograp		N	larket Sh	are (%) by	Geography*	
Assessment Area:	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:	<b>.</b>		·				I.								
MSA 29460- Lakeland	524	27.74	4.27	11.64	19.88	26.72	50.30	40.65	25.55	20.99	2.76	6.06	4.28	2.32	2.1
MSA 36740-Orlando	320	16.94	0.63	0.63	23.67	43.44	38.68	33.44	37.00	22.50	0.31	0.00	0.70	0.28	0.1
MSA 45300 Tampa	288	15.25	3.73	4.17	24.19	35.76	35.69	37.50	36.16	22.57	0.37	0.45	0.62	0.39	0.2
Limited Review:		<u> </u>			ı		l								
MD 22744- Broward County	20	1.06	3.36	5.00	24.59	25.00	33.82	45.00	38.22	25.00	0.00	0.00	0.00	0.00	0.0
MD 48424- Palm Beach County	77	4.08	3.49	11.69	18.91	10.39	31.53	32.47	45.89	45.45	0.01	0.00	0.00	0.00	0.0
MSA 19660- Volusia County	10	0.53	3.35	0.00	20.56	0.00	48.31	50.00	27.78	50.00	0.05	0.00	0.00	0.03	0.1
MSA 26140- Citrus County	53	2.81	0.00	0.00	11.27	13.21	72.74	77.36	16.00	9.43	1.56	0.00	2.59	1.71	0.3
MSA 27260- Duval County	87	4.61	5.32	9.20	25.34	19.54	37.18	39.08	32.16	32.18	0.27	0.43	0.07	0.36	0.3
MSA 36100- Marion County	119	6.30	0.00	0.00	17.85	22.69	56.14	38.66	26.01	38.66	1.14	0.00	1.64	0.86	1.3
MSA 38940 Martin-St Lucie Counties	170	9.00	1.84	2.35	18.24	37.06	53.24	39.41	26.58	21.18	0.14	0.00	0.45	0.12	0.0
MSA 42680- Indian River County	137	7.25	3.80	13.87	8.84	6.57	57.13	51.82	30.03	27.74	1.66	4.12	1.50	1.65	1.1
MSA 45540- Sumter County (The Villages)	42	2.22	0.00	0.00	10.13	21.43	58.41	78.57	31.43	0.00	1.89	0.00	3.25	2.72	0.0
NonMSA Hendry-Okeechobee Counties	32	1.69	0.00	0.00	24.07	18.75	64.43	68.75	11.50	12.50	1.95	0.00	1.27	1.94	4.0
NonMSA-Putnam County	10	0.53	0.00	32.76	50.00	46.29	46.29	30.00	20.95	20.00	0.18	0.00	0.58	0.00	0.0

<sup>\*</sup> Based on 2013 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 (2013).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL	LOANS TO FARM	S		Geography:	FLORIDA		Evaluation	Period: JANU	JARY 1, 2012	TO DECEMI	BER 31, 201	4			
	Total Small Fa	arm Loans	Low-Ir Geogra	ncome aphies	Moderate Geogra			Income aphies	Upper-Ir Geogra		ľ	Market Shai	re (%) by G	eography*	
Assessment Area:	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 29460- Lakeland	17	25.00	1.91	0.00	21.23	17.65	50.95	64.71	25.90	17.65	7.25	0.00	6.25	6.67	12.5
MSA 36740-Orlando	4	5.88	0.58	0.00	20.25	0.00	46.02	75.00	33.02	25.00	1.06	0.00	0.00	2.78	0.0
MSA 45300 Tampa	8	11.76	2.16	0.00	24.90	0.00	40.78	37.50	32.15	62.50	5.43	0.00	0.00	2.63	10.8
Limited Review:												l e e e e e e e e e e e e e e e e e e e			
MD 22744- Broward County	2	2.94	3.31	0.00	28.02	0.00	32.95	100.00	35.73	0.00	3.85	0.00	0.00	9.52	0.0
MD 48424- Palm Beach County	0	0.00	3.87	0.00	22.38	0.00	29.38	0.00	44.33	0.00	0.00	0.00	0.00	0.00	0.0
MSA 19660- Volusia County	0	0.00	1.57	0.00	20.64	0.00	50.91	0.00	26.88	0.00	0.00	0.00	0.00	0.00	0.0
MSA 26140- Citrus County	0	0.00	0.00	0.00	16.20	0.00	65.51	0.00	18.28	0.00	0.00	0.00	0.00	0.00	0.0
MSA 27260- Duval County	0	0.00	4.96	0.00	20.75	0.00	43.54	0.00	30.75	0.00	0.00	0.00	0.00	0.00	0.0
MSA 36100- Marion County	5	7.35	0.00	0.00	15.10	0.00	61.28	80.00	23.62	20.00	1.11	0.00	0.00	1.79	0.0
MSA 38940 Martin-St Lucie Counties	8	11.76	1.32	0.00	21.86	50.00	52.52	37.50	24.31	12.50	10.87	0.00	25.00	6.67	6.6
MSA 42680- Indian River County	6	8.82	1.10	0.00	17.64	33.33	63.62	16.67	17.42	50.00	9.52	0.00	0.00	9.09	12.5
MSA 45540- Sumter County (The Villages)	2	2.94	0.00	0.00	18.53	50.00	71.57	50.00	9.90	0.00	0.00	0.00	0.00	0.00	0.0
NonMSA Hendry-Okeechobee Counties	16	23.53	0.00	0.00	31.19	18.75	48.64	75.00	20.17	6.25	9.62	0.00	11.76	17.65	0.0
NonMSA-Putnam County	0	0.00	0.00	0.00	26.71	0.00	51.14	0.00	22.15	0.00	0.00	0.00	0.00	0.00	0.0

<sup>\*</sup> Based on 2013 Peer Small Business Data -- US and PR 
\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area. 
\*\*\* Source Data - Dun and Bradstreet (2013).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME P	URCHASE			Geography: Fl	LORIDA	E	Evaluation Pe	riod: JANUA	RY 1, 2012 TO	DECEMBER 3	31, 2014				
	Total Home Pi Loans	urchase	Low-Income	e Borrowers		e-Income owers	Middle-I Borro		Upper-Incom	e Borrowers		M	arket Shar	re*	
Assessment Area:	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>1</sup>	% BANK Loans***	% Families**	% BANK Loans***	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:		I	I		I	I	I					<u>l</u>			
MSA 29460- Lakeland	506	40.25	20.25	6.99	18.65	12.50	20.75	20.22	40.35	60.29	2.39	2.25	1.30	1.53	3.50
MSA 36740-Orlando	194	15.43	20.08	3.45	18.64	12.93	20.77	19.83	40.51	63.79	0.23	0.05	0.14	0.19	0.30
MSA 45300 Tampa	199	15.83	21.45	2.88	18.60	22.12	19.19	23.08	40.76	51.92	0.27	0.06	0.32	0.27	0.28
Limited Review:															
MD 22744- Broward County	0	0.00	22.03	0.00	17.44	0.00	19.79	0.00	40.73	0.00	0.00	0.00	0.00	0.00	0.0
MD 48424- Palm Beach County	6	0.48	21.50	0.00	17.84	0.00	18.93	0.00	41.73	100.00	0.01	0.00	0.00	0.00	0.0
MSA 19660- Volusia County	44	3.50	20.15	0.00	18.07	20.00	21.81	10.00	39.97	70.00	0.08	0.00	0.07	0.07	0.1
MSA 26140- Citrus County	17	1.35	18.23	0.00	21.04	20.00	21.40	10.00	39.33	70.00	0.41	0.00	0.32	0.27	0.58
MSA 27260- Duval County	14	1.11	23.20	0.00	18.23	28.57	21.81	14.29	36.76	57.14	0.05	0.00	0.04	0.00	0.10
MSA 36100- Marion County	63	5.01	18.09	4.55	19.80	20.45	22.83	15.91	39.28	59.09	0.68	0.57	1.01	0.61	0.59
MSA 38940 Martin-St Lucie Counties	27	2.15	18.62	14.29	20.11	0.00	20.32	42.86	40.95	42.86	0.03	0.00	0.00	0.07	0.03
MSA 42680- Indian River County	85	6.76	20.32	4.35	16.98	11.59	21.98	14.49	40.72	69.57	2.09	1.00	1.59	1.36	2.79
MSA 45540- Sumter County (The Villages)	11	0.88	14.48	0.00	17.83	20.00	22.66	40.00	45.04	40.00	0.09	0.00	0.54	0.21	0.0
NonMSA Hendry-Okeechobee Counties	84	6.68	22.82	18.37	22.48	28.57	19.05	20.41	35.65	32.65	7.14	12.50	10.99	6.41	3.70
NonMSA-Putnam County	7	0.56	24.79	0.00	18.64	60.00	19.97	20.00	36.61	20.00	0.77	0.00	1.41	1.67	0.00

<sup>\*</sup> Based on 2013 Peer Mortgage Data -- US and PR

\*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 2010 Census information.

\*\*\*As a percentage of loans with borrower income information available. No information was available for 44.4% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOMI	E IMPROVEM	ENT		Geogr	aphy: FLORID	Α	Evaluation	n Period: JAN	UARY 1, 2012	TO DECEMBE	R 31, 2014				
	Total Improvem		Low-In		Moderate Borro	e-Income owers	Middle- Borro			Income owers		Mar	ket Share	*	
Assessment Area:	#	% of Total**	% Families***	% BANK Loans***	% Families <sup>2</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:							<u>I</u>				ļ	Į.			
MSA 29460- Lakeland	93	34.32	20.25	8.70	18.65	26.09	20.75	26.09	40.35	39.13	6.00	3.57	9.26	4.17	6.0
MSA 36740-Orlando	35	12.92	20.08	13.33	18.64	20.00	20.77	20.00	40.51	46.67	0.86	0.98	0.73	0.87	0.8
MSA 45300 Tampa	37	13.65	21.45	8.70	18.60	17.39	19.19	39.13	40.76	34.78	0.93	0.42	0.52	1.91	0.77
Limited Review:							<u>I</u>		<u>I</u>		I	I			
MD 22744- Broward County	0	0.00	22.03	0.00	17.44	0.00	19.79	0.00	40.73	0.00	0.00	0.00	0.00	0.00	0.0
MD 48424- Palm Beach County	1	0.37	21.50	0.00	17.84	0.00	18.93	0.00	41.73	0.00	0.00	0.00	0.00	0.00	0.00
MSA 19660- Volusia County	3	1.11	20.15	0.00	18.07	33.33	21.81	66.67	39.97	0.00	0.41	0.00	0.81	0.86	0.00
MSA 26140- Citrus County	8	2.95	18.23	60.00	21.04	40.00	21.40	0.00	39.33	0.00	1.48	3.70	3.77	0.00	0.00
MSA 27260- Duval County	5	1.85	23.20	0.00	18.23	0.00	21.81	50.00	36.76	50.00	0.13	0.00	0.00	0.00	0.28
MSA 36100- Marion County	20	7.38	18.09	18.75	19.80	12.50	22.83	12.50	39.28	56.25	1.20	3.33	0.00	0.00	2.0
MSA 38940 Martin-St Lucie Counties	6	2.21	18.62	0.00	20.11	33.33	20.32	33.33	40.95	33.33	0.00	0.00	0.00	0.00	0.00
MSA 42680- Indian River County	7	2.58	20.32	0.00	16.98	0.00	21.98	25.00	40.72	75.00	2.75	0.00	0.00	3.23	5.00
MSA 45540- Sumter County (The Villages)	10	3.69	14.48	20.00	17.83	40.00	22.66	40.00	45.04	0.00	1.75	0.00	5.00	4.00	0.0
NonMSA Hendry- Okeechobee Counties	13	4.80	22.82	14.29	22.48	14.29	19.05	57.14	35.65	14.29	14.63	20.00	0.00	25.00	6.67
MSA-Putnam County	33	12.18	24.79	37.50	18.64	33.33	19.97	16.67	36.61	12.50	27.27	50.00	25.00	30.00	10.00

Based on 2013 Peer Mortgage Data -- US and PR
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 2010 Census information.
When the percentage of loans with borrower income information available. No information was available for 43.5% of loans originated and purchased by bank.
Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME	MORTGAGE	REFINAN	CE	G	eography: FLOF	RIDA	Evaluation	n Period: JANU	ARY 1, 2012 TO	D DECEMBER	231, 2014				
Assessment Area:	Total H Mortgage R Loar	Refinance	Low-Incom	e Borrowers	Moderate Borro		Middle-Incom	e Borrowers	Upper-Income	Borrowers		Mark	ket Share	*	
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>3</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															<u> </u>
MSA 29460- Lakeland	157	34.06	20.25	7.02	18.65	7.02	20.75	18.42	40.35	67.54	0.73	0.48	0.65	0.47	0.8
MSA 36740-Orlando	65	14.10	20.08	2.27	18.64	9.09	20.77	25.00	40.51	63.64	0.07	0.04	0.06	0.09	0.0
MSA 45300 Tampa	64	13.88	21.45	12.50	18.60	12.50	19.19	37.50	40.76	37.50	0.09	0.16	0.11	0.16	0.0
Limited Review:															<u>.L</u>
MD 22744- Broward County	2	0.43	22.03	0.00	17.44	0.00	19.79	0.00	40.73	0.00	0.00	0.00	0.00	0.00	0.0
MD 48424- Palm Beach County	5	1.08	21.50	0.00	17.84	0.00	18.93	0.00	41.73	100.00	0.00	0.00	0.00	0.00	0.00
MSA 19660- Volusia County	11	2.39	20.15	28.57	18.07	57.14	21.81	0.00	39.97	14.29	0.04	0.00	0.14	0.00	0.03
MSA 26140- Citrus County	7	1.52	18.23	0.00	21.04	14.29	21.40	42.86	39.33	42.86	0.33	0.00	0.29	0.79	0.2
MSA 27260- Duval County	12	2.60	23.20	0.00	18.23	0.00	21.81	20.00	36.76	80.00	0.02	0.00	0.00	0.03	0.0
MSA 36100- Marion County	43	9.33	18.09	7.69	19.80	17.95	22.83	33.33	39.28	41.03	0.34	0.66	0.30	0.23	0.36
MSA 38940 Martin-St Lucie Counties	14	3.04	18.62	14.29	20.11	0.00	20.32	0.00	40.95	85.71	0.08	0.19	0.00	0.00	0.1
MSA 42680- Indian River County	39	8.46	20.32	3.03	16.98	3.03	21.98	15.15	40.72	78.79	0.87	0.00	0.26	0.91	1.24
MSA 45540- Sumter County (The Villages)	11	2.39	14.48	12.50	17.83	25.00	22.66	25.00	45.04	37.50	0.22	1.19	0.00	0.50	0.0
NonMSA Hendry-Okeechobee Counties	26	5.64	22.82	4.76	22.48	9.52	19.05	19.05	35.65	66.67	1.73	0.00	0.00	0.00	3.3
NonMSA-Putnam County	5	1.08	24.79	25.00	18.64	50.00	19.97	0.00	36.61	25.00	0.46	0.00	1.64	0.00	0.43

Based on 2013 Peer Mortgage Data -- US and PR
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 2010 Census information.

As a percentage of loans with borrower income information available. No information was available for 30.2% of loans originated and purchased by bank.
Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LO	DANS TO BUSIN	ESSES	(	Geography: FLORIC	DA <b>Eval</b> u	uation Period: JANUARY 1, 20	112 TO DECEMBER 31, 20	14	
	Total Small Busine		Businesses With \$1 million		Loans by Orig	inal Amount Regardless of Bus	siness Size	Market Share*	
Assessment Area:	#	% 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:									
MSA 29460- Lakeland	524	27.67	71.67	68.13	56.11	21.76	22.14	2.76	4.4
MSA 36740-Orlando	321	16.95	72.59	77.88	47.35	20.56	32.09	0.31	0.5
MSA 45300 Tampa	288	15.21	71.70	71.88	52.08	25.00	22.92	0.37	0.53
Limited Review:									
MD 22744- Broward County	20	1.06	72.52	55.00	10.00	30.00	60.00	0.00	0.0
MD 48424- Palm Beach County	78	4.12	72.17	41.03	35.90	38.46	25.64	0.01	0.0
MSA 19660- Volusia County	10	0.53	72.93	70.00	40.00	40.00	20.00	0.05	0.0
MSA 26140- Citrus County	53	2.80	76.46	81.13	67.92	26.42	5.66	1.56	2.5
MSA 27260- Duval County	87	4.59	68.76	68.97	50.57	25.29	24.14	0.27	0.30
MSA 36100- Marion County	119	6.28	74.84	82.35	59.66	21.01	19.33	1.14	2.20
MSA 38940 Martin-St Lucie Counties	170	8.98	74.93	53.53	57.65	23.53	18.82	0.14	0.14
MSA 42680- Indian River County	140	7.39	58.33	69.29	62.86	15.71	21.43	1.66	2.7
MSA 45540- Sumter County (The Villages)	42	2.22	70.98	64.29	57.14	19.05	23.81	1.89	2.4.
NonMSA Hendry-Okeechobee Counties	32	1.69	72.42	40.63	56.25	18.75	25.00	1.95	1.9
NonMSA-Putnam County	10	0.53	74.49	60.00	60.00	0.00	40.00	0.18	0.4

<sup>\*</sup> Based on 2013 Peer Small Business Data -- US and PR

<sup>&</sup>quot;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 - 2013).

"Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.58% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL	LOANS TO FARM	MS	G	eography: FLORIDA	Evaluation P	e <mark>riod</mark> : JANUARY 1, 2	012 TO DECEMBER 31, 2014		
	Total Small Lo	ans to Farms	Farms With Remaillion	evenues of \$1 or less	Loans by Original	of Farm Size	Market Share*		
Assessment Area:	#	% of Total**	% of % BANK Farms*** Loans****		\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:	I.				l.		L		
MSA 29460- Lakeland	17	25.00	96.47	76.47	35.29	35.29	29.41	7.25	17.24
MSA 36740-Orlando	4	5.88	96.94	100.00	75.00	25.00	0.00	1.06	1.92
MSA 45300 Tampa	8	11.76	97.07	87.50	25.00	62.50	12.50	5.43	9.80
Limited Review:			Į.	<u>'</u>	1		1		
MD 22744- Broward County	2	2.94	97.54	100.00	100.00	0.00	0.00	3.85	7.69
MD 48424- Palm Beach County	0	0.00	96.75	0.00	0.00	0.00	0.00	0.00	0.00
MSA 19660- Volusia County	0	0.00	98.47	0.00	0.00	0.00	0.00	0.00	0.00
MSA 26140- Citrus County	0	0.00	99.31	0.00	0.00	0.00	0.00	0.00	0.00
MSA 27260- Duval County	0	0.00	97.44	0.00	0.00	0.00	0.00	0.00	0.00
MSA 36100- Marion County	5	7.35	97.90	100.00	60.00	40.00	0.00	1.11	2.08
MSA 38940 Martin-St Lucie Counties	8	11.76	96.29	100.00	50.00	37.50	12.50	10.87	22.73
MSA 42680- Indian River County	6	8.82	94.82	100.00	33.33	50.00	16.67	9.52	20.00
MSA 45540- Sumter County (The Villages)	2	2.94	96.95	100.00	50.00	0.00	50.00	0.00	0.00
NonMSA Hendry-Okeechobee Counties	16	23.53	89.83	87.50	43.75	31.25	25.00	9.62	20.00
NonMSA-Putnam County	0	0.00	97.07	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2013 Peer Small Business Data -- US and PR

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

"Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2013).

"" Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 1.47% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geog	graphy: FLORIDA	Evaluation	n Period: JANUARY	' 1, 2012 TO DECEMBER	31, 2014		
Assessment Area:	Prior Period	Investments*	Current Period Investments			Total Investments		Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:								L	
MSA 29460- Lakeland	0	0	10	42	10	42	0.24	0	
MSA 36740-Orlando	0	0	22	50	22	50	0.29	0	
MSA 45300 Tampa	0	0	12	39	12	39	0.23	0	
Statewide/Regional within AAs	3	6,022	5	11,097	8	17,119	98.79	0	
Limited Review:		<u>.</u>	<u>.</u>	<u>.</u>	<u>.</u>	<u>.</u>	<u>.</u>		
MD 22744- Broward County	0	0	0	0	0	0	0.00	0	
MD 48424- Palm Beach County	0	0	1	3	1	3	0.02	0	
MSA 19660- Volusia County	0	0	2	1	2	1	0.01	0	
MSA 26140- Citrus County	0	0	0	0	0	0	0.00	0	
MSA 27260- Duval County	0	0	5	3	5	3	0.02	0	
MSA 36100- Marion County	0	0	4	2	4	2	0.01	0	
MSA 38940 Martin-St Lucie Counties	0	0	7	60	7	60	0.35	0	
MSA 42680- Indian River County	0	0	6	6	6	6	0.03	0	
MSA 45540- Sumter County (The Villages)	0	0	0	0	0	0	0.00	0	
NonMSA Hendry-Okeechobee Counties	0	0	2	1	2	1	0.01	0	
NonMSA-Putnam County	0	0	2	2	2	2	0.01	0	

<sup>\* &#</sup>x27;Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

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

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

DISTRIBUTION OF BRANCH	DELIVERY SY	STEM AND	BRANCH OF	PENINGS/CI	OSINGS	Geography	: FLORIDA	Evaluation	n Period: JANU	IARY 1, 20	012 TO D	ECEMBE	R 31, 20	14			
	Deposits			Branch	es				Branch O	penings/C	losings			Population			
MA/Assessment Area:	% of Rated Area	# of BANK Branche	% of Rated Area			granches by		# of Branch Openings	# of Branch Closings	Net	change ir Brand (+ 0		of	% of Pop	ulation withi	n Each Geo	graphy
	Deposits in AA	S	Branche s in AA	Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:							•										
MSA 29460- Lakeland	21.45	12	20.69	8.33	25.00	58.33	8.33	0	1	0	0	-1	0	2.08	23.27	52.70	21.96
MSA 36740-Orlando	16.52	11	18.97	0.00	27.27	36.36	36.36	6	7	0	-1	-1	+1	1.09	26.67	41.33	30.90
MSA 45300 Tampa	6.84	7	12.10	14.29	28.57	42.86	14.29	5	2	0	0	+2	+1	4.47	27.34	37.92	29.99
Limited Review:	•				'				l								
MD 22744- Broward County	6.57	3	5.17	0.00	0.00	33.33	66.67	3	0	0	0	+1	+2	4.13	28.90	35.76	31.21
MD 48424- Palm Beach County	12.53	5	8.62	20.00	0.00	20.00	60.00	6	1	+1	0	+1	+3	4.88	26.01	33.30	35.59
MSA 19660- Volusia County	2.15	1	1.72	0.00	0.00	100.00	0.00	0	2	0	0	-1	-1	3.15	20.14	52.85	23.86
MSA 26140- Citrus County	0.00	0	0.00	0.00	0.00	0.00	0.00	0	2	0	0	-2	0	0.00	12.33	71.90	15.76
MSA 27260- Duval County	7.44	3	5.17	0.00	33.33	33.33	33.33	3	0	0	+1	+1	+1	7.14	24.63	40.55	27.68
MSA 36100- Marion County	5.84	5	8.62	0.00	0.00	60.00	40.00	0	1	0	0	0	-1	0.00	16.88	67.81	15.31
MSA 38940 Martin-St Lucie Counties	11.50	3	5.17	0.00	66.67	33.33	0.00	3	1	0	+1	+1	0	2.29	19.63	55.65	22.43
MSA 42680- Indian River County	2.21	1	1.72	100.00	0.00	0.00	0.00	1	1	0	0	0	0	2.30	14.60	59.37	23.73
MSA 45540- Sumter County (The Villages)	1.21	1	1.72	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	6.82	54.55	31.77
NonMSA Hendry-Okeechobee Counties	3.42	3	5.17	0.00	0.00	100.00	0.00	1	1	0	0	0	0	0.00	32.55	57.88	9.57
NonMSA-Putnam County	2.33	3	5.17	0.00	33.33	33.33	33.33	0	1	0	-1	0	0	0.00	26.59	54.82	18.59

#### MD 22744- Broward County

Demographic Information for Limited Scope Are	ea: MD 22744- Brov	ward County				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	361	5.26	27.42	36.84	30.19	0.28
Population by Geography	1,748,066	4.13	28.90	35.76	31.21	0.00
Owner-Occupied Housing by Geography	463,511	1.73	27.32	37.11	33.84	0.00
Business by Geography	322,466	3.36	24.59	33.82	38.22	0.00
Farms by Geography	4,386	3.31	28.02	32.95	35.73	0.00
Family Distribution by Income Level	420,639	22.03	17.44	19.79	40.73	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	166,037	7.73	41.38	34.79	16.10	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		62,619 61,700 12%	Median Housing Va Unemployment Ra Census)		267,849 4.78%	

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 2010 US Census and 2013 HUD updated MFI

## MD 48424- Palm Beach County

Demographic Information for Limited Scope Are	ea: MD 48424- Palm	n Beach County				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	337	6.23	24.93	31.45	35.01	2.37
Population by Geography	1,320,134	4.88	26.01	33.30	35.59	0.22
Owner-Occupied Housing by Geography	384,995	2.96	22.08	36.12	38.83	0.00
Business by Geography	250,936	3.49	18.91	31.53	45.89	0.18
Farms by Geography	4,983	3.87	22.38	29.38	44.33	0.04
Family Distribution by Income Level	324,849	21.50	17.84	18.93	41.73	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	127,797	8.13	36.53	34.23	21.11	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		64,445 64,600 11%	Median Housing Va Unemployment Rat Census)		288,519 4.38%	

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 2010 US Census and 2013 HUD updated MFI

### MSA 19660- Volusia County

Demographic Information for Limited Scope Ar	ea: MSA 19660- Vol	usia County				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	113	4.42	20.35	53.10	22.12	0.00
Population by Geography	494,593	3.15	20.14	52.85	23.86	0.00
Owner-Occupied Housing by Geography	152,160	1.29	15.68	54.75	28.28	0.00
Business by Geography	69,762	3.35	20.56	48.31	27.78	0.00
Farms by Geography	2,355	1.57	20.64	50.91	26.88	0.00
Family Distribution by Income Level	126,653	20.15	18.07	21.81	39.97	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	48,410	4.42	27.51	51.82	16.25	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		55,569 56,500 13%	Median Housing Va Unemployment Rat Census)		199,687 3.68%	

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 2010 US Census and 2013 HUD updated MFI

## MSA 26140- Citrus County

Demographic Information for Limited Scope Ar	ea: MSA 26140- Cit	rus County				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	27	0.00	14.81	70.37	14.81	0.00
Population by Geography	141,236	0.00	12.33	71.90	15.76	0.00
Owner-Occupied Housing by Geography	50,720	0.00	10.98	72.63	16.39	0.00
Business by Geography	16,422	0.00	11.27	72.74	16.00	0.00
Farms by Geography	722	0.00	16.20	65.51	18.28	0.00
Family Distribution by Income Level	39,799	18.23	21.04	21.40	39.33	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	15,629	0.00	16.35	72.38	11.26	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		46,748 48,000 13%	Median Housing Va Unemployment Rat Census)		148,984 4.64%	

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 2010 US Census and 2013 HUD updated MFI

MSA 27260- Duval County (partial)

Demographic Information for Limited Scope Ar	ea: MSA 27260- Du	val County (partial)				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	173	9.83	28.32	37.57	24.28	0.00
Population by Geography	864,263	7.14	24.63	40.55	27.68	0.00
Owner-Occupied Housing by Geography	208,357	4.76	20.61	42.35	32.28	0.00
Business by Geography	118,840	5.32	25.34	37.18	32.16	0.00
Farms by Geography	2,501	4.96	20.75	43.54	30.75	0.00
Family Distribution by Income Level	208,156	23.20	18.23	21.81	36.76	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	86,246	11.83	34.14	39.67	14.36	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		63,927 63,200 13%	Median Housing Va Unemployment Rat Census)		187,499 4.51%	

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 2010 US Census and 2013 HUD updated MFI

MSA 36100- Marion County

Demographic Information for Limited Scope Arc	ea: MSA 36100- Ma	rion County				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	63	0.00	23.81	55.56	17.46	3.17
Population by Geography	331,298	0.00	16.88	67.81	15.31	0.00
Owner-Occupied Housing by Geography	105,672	0.00	13.04	73.07	13.89	0.00
Business by Geography	37,774	0.00	17.85	56.14	26.01	0.00
Farms by Geography	2,384	0.00	15.10	61.28	23.62	0.00
Family Distribution by Income Level	91,513	18.09	19.80	22.83	39.28	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	34,677	0.00	22.69	67.90	9.41	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		47,614 45,800 14%	Median Housing Va Unemployment Ra Census)		150,430 4.53%	

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 2010 US Census and 2013 HUD updated MFI

#### MSA 38940 Martin-St Lucie Counties

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	79	3.80	24.05	44.30	25.32	2.53
Population by Geography	424,107	2.29	19.63	55.65	22.43	0.00
Owner-Occupied Housing by Geography	125,403	1.02	14.71	57.46	26.81	0.00
Business by Geography	61,472	1.84	18.24	53.24	26.58	0.10
Farms by Geography	2,127	1.32	21.86	52.52	24.31	0.00
Family Distribution by Income Level	108,932	18.62	20.11	20.32	40.95	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	42,189	4.47	23.99	56.71	14.84	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		56,832 53,300 11%	Median Housing Va Unemployment Rat Census)		217,917 5.02%	

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 2010 US Census and 2013 HUD updated MFI

MSA 42680- Indian River County

Demographic Information for Limited Scope Ar	ea: MSA 42680- Ind	lian River County				
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	30	3.33	13.33	56.67	23.33	3.33
Population by Geography	138,028	2.30	14.60	59.37	23.73	0.00
Owner-Occupied Housing by Geography	44,186	1.08	11.88	58.73	28.31	0.00
Business by Geography	28,747	3.80	8.84	57.13	30.03	0.21
Farms by Geography	907	1.10	17.64	63.62	17.42	0.22
Family Distribution by Income Level	37,314	20.32	16.98	21.98	40.72	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	13,918	4.17	19.78	61.81	14.24	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		57,477 60,500 11%	Median Housing Va Unemployment Rat Census)		253,300 4.84%	

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 2010 US Census and 2013 HUD updated MFI

### MSA 45540- Sumter County (The Villages)

Demographic Information for Limited Scope Ar	ea: MSA 45540- Sun	nter County (The Vi	llages)		,	
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	0.00	15.79	68.42	5.26	10.53
Population by Geography	93,420	0.00	6.82	54.55	31.77	6.86
Owner-Occupied Housing by Geography	34,463	0.00	5.43	69.83	24.74	0.00
Business by Geography	7,357	0.00	10.13	58.41	31.43	0.04
Farms by Geography	394	0.00	18.53	71.57	9.90	0.00
Family Distribution by Income Level	27,190	14.48	17.83	22.66	45.04	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	8,784	0.00	12.74	71.70	15.56	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		46,748 48,000 10%	Median Housing Value Unemployment Rate (2010 US Census)		167,135 2.98%	

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 2010 US Census and 2013 HUD updated MFI

### **NonMSA Hendry-Okeechobee Counties**

Demographic Information for Limited Scope Area: NonMSA Hendry-Okeechobee Counties							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts/BNAs)	17	0.00	29.41	58.82	11.76	0.00	
Population by Geography	79,136	0.00	32.55	57.88	9.57	0.00	
Owner-Occupied Housing by Geography	18,206	0.00	30.50	60.39	9.11	0.00	
Business by Geography	6,693	0.00	24.07	64.43	11.50	0.00	
Farms by Geography	590	0.00	31.19	48.64	20.17	0.00	
Family Distribution by Income Level	18,407	22.82	22.48	19.05	35.65	0.00	
Distribution of Low and Moderate Income Families throughout AA Geographies	8,338	0.00	38.64	55.89	5.47	0.00	
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		46,748 48,000 19%	Median Housing Value Unemployment Rate (2010 US Census)		133,893 5.71%		

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 2010 US Census and 2013 HUD updated MFI

# **NonMSA-Putnam County**

Demographic Information for Limited Scope Area: NonMSA-Putnam County							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts/BNAs)	17	0.00	29.41	47.06	17.65	5.88	
Population by Geography	74,364	0.00	26.59	54.82	18.59	0.00	
Owner-Occupied Housing by Geography	22,686	0.00	23.98	58.28	17.75	0.00	
Business by Geography	6,362	0.00	32.76	46.29	20.95	0.00	
Farms by Geography	307	0.00	26.71	51.14	22.15	0.00	
Family Distribution by Income Level	19,653	24.79	18.64	19.97	36.61	0.00	
Distribution of Low and Moderate Income Families throughout AA Geographies	8,534	0.00	34.54	53.68	11.78	0.00	
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		46,748 48,000 22%	Median Housing Value Unemployment Rate (2010 US Census)		111,691 4.59%		

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification. Source: 2010 US Census and 2013 HUD updated MFI