



PUBLIC DISCLOSURE

October 15, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Florida Community Bank, National Association
Charter Number 24947

Weston Corporate Center 1, 2500 Weston Road
Weston, FL 33331

Office of the Comptroller of the Currency

Doral Costa Office Park
9800 NW 41st Street, Suite 120
Miami, FL 33178-2970

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

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Overall CRA Rating

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

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

Performance Levels	Florida Community Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	x	x	x
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

- Geographic distribution for home mortgage loans and small loans to businesses is good.
- Borrower distribution for home mortgage loans and small loans to businesses is good.
- FCB had a significantly positive level of community development loans that were responsive to community needs.
- FCB had a good level of qualified investments and grants/donations.
- Service delivery systems are reasonably accessible to essentially all portions of the institution’s assessment area(s).
- FCB provides a relatively high level of community development services that are responsive to a variety of community development needs.

Definitions and Common Abbreviations

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

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

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

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

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

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 of Governors of the Federal Reserve System, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) 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 One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

Florida Community Bank, N.A. (FCB) is an intrastate commercial bank headquartered in Weston, Florida. FCB is wholly owned by Bond Street Holdings, Inc. (BSH) also headquartered in Weston, Florida. BSH was established in April 2009, to acquire depository institutions within the United States, initially through failed bank auctions conducted by the FDIC.

As of June 30, 2013, FCB reported total assets of \$3.5 billion. Deposits totaled \$2.6 billion. The total loan portfolio (net of unearned income) totaled \$1.7 billion and represented 48 percent of total assets. The loan to deposit ratio was 63 percent. Components of FCB's loan portfolio include commercial real estate loans (44 percent), commercial and industrial loans (33 percent), residential real estate loans (12 percent), construction loans (8 percent), and other loans, including consumer loans (3 percent). As of June 30, 2013, Tier 1 Capital totaled \$405 million.

Through acquisitions and organic growth, FCB has expanded its branch network and now services three of the four largest Metropolitan Statistical Areas (MSAs) in Florida. FCB offers a full range of traditional banking products and services to individuals, small and medium-sized businesses, and other local entities, through 41 full service branches and one limited service facility located in Weston. The branch network extends from Naples to Sarasota, and beyond to Brooksville on the west coast of Florida, and from Miami to Daytona Beach on the east coast. Offices in the greater Orlando area provide coverage in central Florida. Banking Center locations are divided amongst census tracts in three different income levels: 13 (31 percent) moderate income, 21 (50 percent) middle income, and 8 (19 percent) upper-income.

In addition to the purchase of the legacy FCB, Bond Street Holdings also acquired seven additional Florida-based banks, which include Premier American Bank, Peninsula Bank, Sunshine State Community Bank, First National Bank of Central Florida, Cortez Community Bank, Coastal Bank and First Peoples Bank. All eight acquired Banks were joined together into FCB.

FCB's strategic focus is to grow the bank's presence in existing markets and, through acquisition, expanding into the Tampa and Jacksonville areas. Board and management have aspirations of expanding the branch network in existing markets as well as in other major population centers in the state of Florida in the near term.

There are no legal or financial factors impeding FCB's ability to help meet the credit needs of its assessment areas. However, FCB, and the financial industry collectively, faced significant challenges due to the impact of the recession and housing crisis. This is the first CRA examination for FCB since its acquisition in 2010.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We analyzed home purchase, and home refinance mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses the bank reported under the Community Reinvestment Act (CRA), for the period January 1, 2010, through September 30, 2013. Multifamily loans are not a primary loan product, therefore, we did not evaluate this product separately. However, we did consider multifamily loans meeting the community development (CD) definition as part of the evaluation of CD lending. Primary loan products for this review are products in which the bank originated at least 20 loans within the assessment area during the evaluation period. Emphasis is placed on loan originations during 2012 through September 30, 2013. FCB's loan volume was higher for this period when compared to loan originations in 2010 and 2011. Performance tables in Appendix C include only 2012 through September 30, 2013, loan data. Data from 2010 and 2011 was not evaluated because loan volumes for these periods was very low. We reviewed community development loans, investments, and services for the period January 22, 2010, through October 15, 2013.

Data Integrity

As part of our ongoing supervision of the bank, we tested the accuracy of the bank's 2010 HMDA and CRA lending data. Our testing indicated numerous errors with the HMDA and CRA data. Management corrected the errors with the HMDA data. FCB was not required to report CRA data for 2010; however, the data was collected and reported. Based on our identification of errors with the HMDA and CRA data and management's willingness to correct the data, we determined that subsequent reportable loans could be relied upon for this report.

Selection of Areas for Full-Scope Review

FCB has fourteen (14) assessment areas of which thirteen (13) are MDs or MSAs. We selected five assessment areas for a full-scope review. Full-scope reviews consider performance context, quantitative and qualitative factors. In general, the assessment areas selected for the full-scope review were chosen because they represented a significant portion of the bank's deposit base and lending business in that state. The remaining nine assessment areas were analyzed using limited-scope procedures. Limited-scope procedures consider quantitative factors only.

Ratings

In this evaluation, we placed more weight on the bank's performance in 2012 through September 30, 2013, than to its performance in 2010 and 2011 to reach our conclusions. The bank's overall rating is derived from results in those areas that received full-scope reviews.

Additionally, when evaluating the bank's performance under the lending test, we placed a higher value on the bank's distribution of home mortgage loans than the distribution of small business loans. Primary emphasis was placed on home mortgage loans due to more HMDA loans being reported in 2012 through September 30, 2013, and the affordable housing credit

needs identified in all assessment areas. Secondary emphasis was placed on small business loan performance due to the identified community credit need in all assessment areas. Within the home mortgage loan category, greater weight was placed on home purchase loans as the volume was greater than refinance loans. The volume of home improvement loans was low; and therefore, not considered in this evaluation.

Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c), or 12 C.F.R. 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 Fort Lauderdale-Pompano Beach-Deerfield Beach MD #22744 is adequate; performance in the Miami-Miami Beach-Kendall MD #33124 is adequate; performance in the West Palm Beach-Boca Raton-Boynton MD #48424 is adequate; performance in the Cape Coral-Fort Myers MSA #15980 is adequate; and performance in the Naples-Marco Island MSA #34940 is adequate.

Lending Activity

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

Overall lending activity in FCB's full-scope assessments areas for January 1, 2012, to September 30, 2013, is adequate. Home mortgage lending activity was adequate and small business activity was adequate. Multiple performance context factors had an impact on FCB's lending activity. Most importantly, FCB is a de novo bank that had initial growth through acquisition of failed institutions. During the bank's first few years of operations, loan originations were primarily renewals of matured legacy loans while the bank focused on establishing adequate infrastructure to begin originating new loans. The assessment area is highly competitive with a large number of lenders reporting home mortgage loan activity. These lenders include non-bank lenders that do not take deposits in the assessment area as well as large banks with a nationwide presence that offer a wide variety of home mortgage loan products.

During the evaluation period, the bank had a very low volume of home improvement, multifamily, and small farm lending; therefore, an analysis of this activity would not be meaningful and was not completed for this review of performance. Overall lending activity during 2010 and 2011 was weaker in loan volume and dollar amount for generally all categories of loans.

MD 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach

Overall, home mortgage lending activity is adequate. For home purchase activity (including originations and purchases), as reported under the HMDA, FCB was ranked 124th of 423 reporters in 2012 (the most recent data available), with a 0.06 percent market share, based on number of loans. The bank is ranked 143rd of 454 reporters for home refinance loans with a 0.03 percent market share. This performance is lower than the bank's deposit market share and rank; however, based on the bank's business strategy and level of competition in the market, such performance does not materially detract from the bank's overall lending activity

performance for home mortgage lending. The top 10 lenders originating or purchasing home purchase loans account for 51.82 percent of market share for number of loans and 50.75 percent of market share for dollar volume of loans. For home refinance loans, the top 10 lenders account for 68.68 percent of market share for number of loans and 63.58 percent of market share for dollar volume of loans.

Lending activity for small loans to businesses is adequate. According to 2012 Peer Mortgage Data (the most recent available data), FCB is ranked 55th of 113 reporters with a 0.01 percent market share for small loans to businesses. Lending activity in the market is concentrated with larger financial institutions and credit card lenders including American Express, FSB, FIA Card Services, Chase Bank USA, N.A., Citibank, N.A., and Wells Fargo Bank, N.A. The top 10 lenders account for 90.47 percent of market share based on number of loans and 56.22 percent of market share based on dollar volume. American Express alone had 40.64 percent of market share for number of loans and 13.68 percent of market share for dollar volume.

MD 33124 Miami-Miami Beach-Kendall

Overall, home mortgage lending activity is adequate. For home purchase activity (including originations and purchases), as reported under the HMDA, FCB was ranked 134th of 339 reporters in 2012 (the most recent data available), with a 0.03 percent market share, based on number of loans. The bank is ranked 90th of 390 reporters for home refinance loans with a 0.08 percent market share. This performance is lower than the bank's deposit market share and rank; however, based on the bank's business strategy and level of competition in the market, such performance does not materially detract from the bank's overall lending activity performance for home mortgage lending. The top 10 lenders originating or purchasing home purchase loans account for 51.21 percent of market share for number of loans and 43.77 percent of market share for dollar volume of loans. For home refinance loans, the top 10 lenders account for 70.60 percent of market share for number of loans and 61.82 percent of market share for dollar volume of loans.

Lending activity for small loans to businesses is adequate. According to 2012 Peer Mortgage Data (the most recent available data), FCB is ranked 50th of 104 reporters with a 0.01 percent market share for small loans to businesses. Lending activity in the market is concentrated with larger financial institutions and credit card lenders including American Express, FSB, Citibank, N.A., Chase Bank USA, N.A., Capital One, N.A., and FIA Card Services. The top 10 lenders account for 90.56 percent of market share based on number of loans and 59.34 percent of market share based on dollar volume. American Express alone had 40.43 percent of market share for number of loans and 13.07 percent of market share for dollar volume.

MD 48424 West Palm Beach-Boca Raton-Boynton Beach

Overall, home mortgage lending activity is adequate. For home purchase activity (including originations and purchases), as reported under the HMDA, FCB was ranked 144th of 405 reporters in 2012 (the most recent data available), with a 0.04 percent market share, based on number of loans. The bank is ranked 176th of 490 reporters for home refinance loans with a 0.02 percent market share. This performance is lower than the bank's deposit market share and rank; however, based on the bank's business strategy and level of competition in the market, such performance does not materially detract from the bank's overall lending activity

performance for home mortgage lending. The top 10 lenders originating or purchasing home purchase loans account for 53.79 percent of market share for number of loans and 50.05 percent of market share for dollar volume of loans. For home refinance loans, the top 10 lenders account for 67.91 percent of market share for number of loans and 61.23 percent of market share for dollar volume of loans.

Lending activity for small loans to businesses is adequate. According to 2012 Peer Mortgage Data (the most recent available data), FCB is ranked 69th of 124 reporters with a 0.01 percent market share for small loans to businesses. Lending activity in the market is concentrated with larger financial institutions and credit card lenders including American Express, FSB, Chase Bank USA, N.A., FIA Card Services, Wells Fargo Bank, N.A., and Capital One, N.A. The top 10 lenders account for 89.09 percent of market share based on number of loans and 58.52 percent of market share based on dollar volume. American Express alone had 42.78 percent of market share for number of loans and 12.07 percent of market share for dollar volume.

MSA 15980 Cape Coral-Ft. Myers

Overall, home mortgage lending activity is adequate. For home purchase activity (including originations and purchases), as reported under the HMDA, FCB was ranked 122nd of 439 reporters in 2012 (the most recent data available), with a 0.06 percent market share, based on number of loans. The bank is ranked 143rd of 461 reporters for home refinance loans with a 0.04 percent market share. This performance is lower than the bank's deposit market share and rank; however, based on the bank's business strategy and level of competition in the market, such performance does not materially detract from the bank's overall lending activity performance for home mortgage lending. The top 10 lenders originating or purchasing home purchase loans account for 49.88 percent of market share for number of loans and 45.72 percent of market share for dollar volume of loans. For home refinance loans, the top 10 lenders account for 68.02 percent of market share for number of loans and 63.17 percent of market share for dollar volume of loans.

Lending activity for small loans to businesses is adequate. According to 2012 Peer Mortgage Data (the most recent available data), FCB is ranked 25th of 94 reporters with a 0.34 percent market share for small loans to businesses. Lending activity in the market is concentrated with larger financial institutions and credit card lenders including American Express, FSB, Capital One, N.A., and FIA Card Services. The top 10 lenders account for 84.93 percent of market share based on number of loans and 36.98 percent of market share based on dollar volume. American Express alone had 31.09 percent of market share for number of loans and 7.69 percent of market share for dollar volume.

MSA 34940 Naples-Marco Island

Overall, home mortgage lending activity is adequate. For home purchase activity (including originations and purchases), as reported under the HMDA, FCB was ranked 64th of 394 reporters in 2012 (the most recent data available), with a 0.15 percent market share, based on number of loans. The bank is ranked 87th of 394 reporters for home refinance loans with a 0.06 percent market share. This performance is lower than the bank's deposit market share and rank; however, based on the bank's business strategy and level of competition in the market, such performance does not materially detract from the bank's overall lending activity

performance for home mortgage lending. The top 10 lenders originating or purchasing home purchase loans account for 54.43 percent of market share for number of loans and 51.11 percent of market share for dollar volume of loans. For home refinance loans, the top 10 lenders account for 63.78 percent of market share for number of loans and 55.79 percent of market share for dollar volume of loans.

Lending activity for small loans to businesses is adequate. According to 2012 Peer Mortgage Data (the most recent available data), FCB is ranked 29th of 94 reporters with a 0.29 percent market share for small loans to businesses. Lending activity in the market is concentrated with larger financial institutions and credit card lenders including American Express, FSB, Capital One, N.A., and FIA Card Services. The top 10 lenders account for 84.44 percent of market share based on number of loans and 34.83 percent of market share based on dollar volume. American Express alone had 37.04 percent of market share for number of loans and 9.28 percent of market share for dollar volume.

Distribution of Loans by Income Level of the Geography

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.

Geographic distribution of home mortgage loans for the full-scope assessment areas is good.

MD 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach

Home Purchase

Geographic distribution for home purchase loans is good. FCB did not originate any loans in low-income geographies. The percentage of owner-occupied housing units is very low in low-income census tracts, which indicates few to no opportunities to originate home purchase loans in these geographies. Based on 2012 Peer Mortgage Data, FCB's overall market share for home purchase loans is less than one percent at 0.06 percent. The data does not show any loan originations in low-income CTs for the bank. The percentage of bank loans originated in moderate-income CTs is near to the percentage of owner-occupied housing units in these tracts. Market share data reflects an adequate level of loan originations in moderate-income geographies.

Refinance

Geographic distribution for refinance loans is adequate. FCB did not originate any loans in low-income census tracts. The percentage of owner-occupied housing units was very low at less than two percent, which indicates few to no lending opportunities to originate refinance loans in these geographies. In addition, many lenders tightened underwriting criteria for refinance loans making it difficult for many low- and moderate-income homeowners to refinance their mortgages. The percentage of bank loans in moderate-income geographies was somewhat lower than the percentage of owner-occupied housing units. Based on 2012 Peer Mortgage Data, FCB's overall market share for refinance loans was very low at 0.03

percent. There was no market share in low-income geographies. The bank's market share in moderate-income geographies exceeded the overall market share.

MD 33124 Miami-Miami Beach-Kendall

Home Purchase

Geographic distribution for home purchase loans is good. FCB did not originate any loans in low-income geographies. The percentage of owner-occupied housing units is very low in low-income census tracts, which indicates few to no opportunities to originate home purchase loans in these geographies. Based on 2012 Peer Mortgage Data, FCB's overall market share for home purchase loans is less than one percent at 0.03 percent. The data does not show any loan originations in low-income CTs for the bank. The percentage of bank loans originated in moderate-income CTs is near to the percentage of owner-occupied housing units in these tracts. Market share data reflects an excellent level of loan originations in moderate-income geographies.

Refinance

Geographic distribution for refinance loans is poor. FCB did not originate any refinance loans in low-income census tracts. The percentage of owner-occupied housing units was less than two percent, which indicates few to no opportunities to originate refinance loans. The percentage of bank loans in moderate-income geographies is lower than the percentage of owner-occupied housing units. After the mortgage crisis, many lenders tightened underwriting criteria for refinance loans making it difficult for many low- and moderate-income homeowners to refinance their mortgages. Based on 2012 Peer Mortgage Data, FCB's overall market share for refinance loans was 0.05 percent. The bank had no market share in low-income census tracts. Market share in moderate-income census tracts was near to the overall market share.

MD 48424 West Palm Beach-Boca Raton-Boynton Beach

Home Purchase

Geographic distribution for home purchase loans is adequate. The percentage of bank loans in low-income geographies exceeds the percentage of owner-occupied housing units. The percentage of bank loans in moderate-income geographies is lower than the percentage of owner-occupied housing units. Based on 2012 Peer Mortgage Data, FCB's overall market share is 0.04 percent. FCB had no market share in low-income census tracts. The bank's market share in moderate-income census tracts was equal to the overall market share.

Refinance

Geographic distribution in low- and moderate-income census tracts is very poor. FCB did not originate any refinance loans in low- and moderate-income census tracts. The bank originated a total of sixteen refinance loans for the evaluation period in the assessment area. Based on 2012 Peer Mortgage Data, FCB's overall market share for refinance loans is 0.02 percent. The bank reported no market share in low- and moderate-income census tracts.

MSA 15980 Cape Coral-Fort Myers

Home Purchase

Geographic distribution for home purchase loans is excellent. The percentage of home purchase loans in low- and moderate-income geographies exceeds the percentage of owner-occupied housing units in those geographies. Based on 2012 Peer Mortgage Data, FCB's overall market share is 0.06 percent. The bank reported no market share in low-income census tracts. FCB's market share in moderate-income census tracts exceeded the overall market share.

Refinance

Geographic distribution for home refinance loans is poor. FCB had no refinance loans in low- or moderate-income geographies and no market share for these geographies for 2012. Home refinance loans in this assessment area count for 7.87 percent of the total of home refinance loans for the bank.

MSA 34940 Naples-Marco Island

Home Purchase

Geographic distribution for home purchase loans is excellent. The percentage of home purchase loans in low- and moderate-income geographies exceeds the percentage of owner-occupied housing units in those geographies. Based on 2012 Peer Mortgage Data, FCB's overall market share is 0.15 percent. The bank reported no market share in low-income census tracts. FCB's market share in moderate-income census tracts exceeded the overall market share.

Refinance

Geographic distribution for home refinance loans is poor. FCB has no refinance loans in low-income geographies and the percentage of refinances in moderate-income geographies was lower than the percentage of owner-occupied housing units in those geographies. Based on 2012 Peer Mortgage Data, FCB's overall market share is 0.08 percent. The bank reported no market share in low-income census tracts. FCB's market share in moderate-income census tracts exceeded the overall market share.

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 and purchase of small loans to businesses.

Geographic distribution for small loans to businesses in the full-scope assessment areas is good.

MD 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach

Geographic distribution of small loans to businesses is good. The percentage of bank loans exceeded the percentage of businesses located in low- and moderate-income geographies. Based on 2012 Peer Small Business Data, FCB's overall market share in the assessment area is very low at 0.01 percent. The bank's market share in low- and moderate-income census tracts exceeds the overall market share.

MD 33124 Miami-Miami Beach-Kendall

Geographic distribution of small loans to businesses is adequate. The percentage of bank loans in low-income geographies exceeds the percentage of businesses located in low-income census tracts. The percentage of bank loans in moderate-income geographies is lower than the percentage of businesses in moderate-income geographies. Based on 2012 Peer Small Business Data, the bank's overall market share is very low at 0.01 percent. FCB's market share in low-income geographies exceeds the overall market share. Market share in moderate-income geographies is equal to the overall market share.

MD 48424 West Palm Beach-Boca Raton-Boynton Beach

Geographic distribution of small loans to businesses is excellent. FCB did not originate any small loans to businesses in low-income census tracts. The percentage of businesses located in low-income census tracts is relatively low at 3.49 percent, which indicates fewer opportunities to originate small loans to businesses. The percentage of bank loans in moderate-income census tracts exceeds the percentage of businesses located in moderate-income census tracts. Market share is negligible at 0.01 percent, based on 2012 Peer Small Business Data. FCB had no market share in low- and moderate-income geographies.

MSA 15980 Cape Coral-Fort Myers

FCB has excellent penetration of small loans to businesses in low- and moderate-income geographies. The percentage of small loans to businesses in low-income geographies exceeds the percentage of businesses in those geographies, and the bank's market share of small loans to businesses in low-income geographies exceeds the bank's overall market share of small loans to businesses. In moderate-income geographies, the percentage of small loans to businesses exceeds the percentage of businesses in those geographies, and the bank's market share of small loans to businesses in moderate-income geographies exceeds the bank's overall market share of small loans to businesses.

MSA 34940 Naples-Marco Island

FCB has excellent penetration of small loans to businesses in low- and moderate-income geographies. The percentage of small loans to businesses in low-income geographies exceeds the percentage of businesses in those geographies, and the bank's market share of small loans to businesses in low-income geographies exceeds the bank's overall market share of small loans to businesses. In moderate-income geographies, the percentage of small loans to businesses exceeds the percentage of businesses in those geographies, and the bank's

market share of small loans to businesses in moderate-income geographies exceeds the bank's overall market share of small loans to businesses.

Small Loans to Farms

Refer to Table 7 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination and purchase of small loans to farms.

Small loans to farms were not evaluated due to the low number of loan originations.

Lending Gap Analysis

We evaluated the lending distribution of this assessment area to determine if any unexplained conspicuous gaps existed. No unexplained conspicuous gaps were identified after reviewing performance context.

Inside/Outside Ratio

This ratio is a bank-wide calculation, and not calculated by individual rating area or AA. Analysis is limited to bank originations and purchases, and does not include any affiliate data. For the combined three-year evaluation period, FCB originated a majority of all loan products inside the bank's AAs (74.6 percent). The percentage in number of loans made inside the AAs by loan type are as follows: home refinance loans (67.3 percent), home purchase loans (64.1 percent), home improvement loans (87.5 percent), small loans to businesses (92.6 percent) and small loans to farms (83.8 percent).

Distribution of Loans by Income Level of the Borrower

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.

Overall, the distribution of home mortgage loans by the income level of the borrower in the full-scope assessment areas is good.

MD 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach

Home Purchase

Borrower distribution for home purchase loans is good. The percentage of bank loans to low- and moderate-income borrowers is near to the percentage of families that are low- and moderate-income. Based on 2012 Peer Mortgage Data, FCB's overall market share was very low at 0.06 percent. The bank's market share for low-income borrowers exceeded the overall market share for home purchase loans. The bank's market share for moderate-income borrowers is somewhat lower than the overall market share.

Refinance

Borrower distribution for refinance loans is poor. FCB did not originate any loans to low-income borrowers. The percentage of bank loans to moderate-income borrowers is lower than the percentage of families that are moderate-income. Based on 2012 Peer Mortgage Data, the overall market share for refinance loans is very low at 0.03 percent. The bank did not have any market share data for low-income borrowers. Market share for moderate-income borrowers exceeded the overall market share.

MD 33124 Miami-Miami Beach-KendallHome Purchase

Borrower distribution for home purchase loans is good. The percentage of bank loans to low-income borrowers is somewhat lower than the percentage of families that are low-income. The percentage of bank loans to moderate-income borrowers exceeds the percentage of families that are moderate-income. Based on 2012 Peer Mortgage Data, the bank's overall market share is very low at 0.04 percent. FCB did not report any market share data for low- and moderate-income borrowers.

Refinance

Borrower distribution for refinance loans is poor for low- and moderate-income borrowers. The percent of bank loans to low- and moderate-income borrowers is lower than the percent of families that are low- and moderate-income. Based on 2012 Peer Mortgage Data, FCB's overall market share for refinance loans was 0.06 percent. Market share data for low-income borrowers was equal to the overall market share, and near to the overall market share for moderate-income borrowers.

MD 48424 West Palm Beach-Boca Raton-Boynton BeachHome Purchase

Borrower distribution for low- and moderate-income borrowers is poor. The percentage of bank loans to low- and moderate-income borrowers is lower than the percentage of families that are low- and moderate-income in the assessment area. Based on 2012 Peer Mortgage Data, the bank's overall market share for home purchase loans was only 0.04 percent. FCB did not report any market share data for low- and moderate-income borrowers.

Refinance

Borrower distribution for low- and moderate-income borrowers is poor. The percentage of bank loans to low- and moderate-income borrowers is lower than the percentage of families that are low- and moderate-income in the assessment area. Based on 2012 Peer Mortgage Data, the bank's overall market share for home purchase loans was only 0.02 percent. Market share data for low-income borrowers exceeded the overall market share. FCB did not report any market share data for moderate-income borrowers.

MSA 15980 Cape Coral-Fort MyersHome Purchase

Borrower distribution for home purchase loans is excellent. The percentage of home purchase loans to low-income borrowers exceeds the percentage of low-income families. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families. Based on 2012 Peer Mortgage Data, the bank's market share for home purchase loans was nominal at 0.07 percent. FCB did not report any market share data for low- and moderate-income borrowers.

Refinance

Borrower distribution for home refinance loans is excellent. For refinance loans, the percentage of loans to low-income borrowers exceeds the percentage of low-income families in the assessment area. The percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families. Based on 2012 Peer Mortgage Data, the bank's market share for home refinance loans was nominal at 0.04 percent. Market share data for low- and moderate-income borrowers exceeded the overall market share.

MSA 34940 Naples-Marco IslandHome Purchase

Borrower distribution for home purchase loans is good. The percentage of home purchase loans to low-income borrowers exceeds the percentage of low-income families. The percentage of loans to moderate-income borrowers is lower than the percentage of moderate-income families. Based on 2012 Peer Mortgage Data, the bank's market share for home purchase loans was very low at 0.17 percent. Market share data for low-income borrowers exceeded the overall market share. FCB did not report any market share data for moderate-income borrowers.

Refinance

Borrower distribution for home refinance loans is adequate. For refinance loans, the percentage of loans to low-income borrowers was lower than the percentage of low-income families in the assessment area. The percentage of loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income families. Based on 2012 Peer Mortgage Data, the bank's market share for home refinance loans was nominal at 0.07 percent. FCB did not report any market share data for low-income borrowers. Market share data for moderate-income borrowers exceeded the overall market share.

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 and purchase of small loans to businesses.

Overall, borrower distribution to small loans to businesses is adequate.

MD 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach

Table 11 indicates that ten (10) loans were originated. This level of lending is not sufficient to perform a meaningful analysis.

MD 33124 Miami-Miami Beach-Kendall

Borrower distribution for small loans to businesses is poor. The percentage of bank loans to businesses with revenues of \$1 million or less is lower than the percentage of businesses in the assessment area with revenues of \$1 million or less. Based on 2012 Peer Small Business Data, overall market share in the assessment area is negligible at 0.01 percent. Market share data for businesses with revenues of \$1 million or less is equal to the overall market share.

MD 48424 West Palm Beach-Boca Raton-Boynton Beach

Table 11 indicates that six (6) loans were originated. This level of lending is not sufficient to perform a meaningful analysis.

MSA 15980 Cape Coral-Fort Myers

The distribution of small loans to businesses is good. The percentage of bank loans to businesses with revenues of \$1 million or less is somewhat lower than the percentage of small businesses in the assessment area. The bank's market share of small loans to small businesses exceeds its overall market share of small loans to businesses. In addition, of small loans to businesses, 53.34 percent are for amounts of \$250,000 or less for 2012-2013 indicating that FCB is meeting the needs of small businesses.

MSA 34940 Naples-Marco Island

The distribution of small loans to businesses is adequate. The percentage of bank loans to businesses with revenues of \$1 million or less is lower than the percentage of small businesses in the assessment area. The bank's market share of small loans to small businesses is equal to its overall market share of small loans to businesses. In addition, of small loans to businesses, 55.36 percent are for amounts of \$250,000 or less for 2012-2013 indicating that FCB is meeting the needs of small businesses.

Small Loans to Farms

Refer to Table 12 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to farms.

Small loans to farms were not evaluated due to the low number of loan originations.

Community Development Lending

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

FCB had a significantly positive level of community development loans that were responsive to community needs. During the evaluation period, FCB originated thirty-three (33) CD loans totaling \$87 million in the full-scope assessment areas. This volume represents 21.29 percent of Tier 1 Capital.

MD 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach

FCB's level of CD lending had a positive impact on its overall lending performance in the assessment area. FCB originated four (4) loans totaling \$12.8 million in qualified CD loans in the assessment area during the evaluation period. This volume represented 3.13 percent of Tier 1 Capital. The bank's CD loans were highly responsive to assessment area needs, demonstrated leadership, and supported activities that promoted economic development in the assessment area.

Specific examples of the CD loans originated during this evaluation period include:

- Three loans that totaled \$12.7 million to an aviation company that has engaged in substantial construction and real estate acquisition projects that will serve as a catalyst for job creation and economic stimulation within the assessment area.
- A \$175,000 loan to a non-profit organization that provides affordable housing opportunities within the bank's assessment area.

MD 33124 Miami-Miami Beach-Kendall

FCB's level of CD lending had a significantly positive impact on its overall lending performance in the assessment area. FCB originated seventeen (17) loans totaling \$39.2 million in qualified CD loans in the assessment area during the evaluation period. All loans were for multi-family housing. This volume represented 9.55 percent of Tier 1 Capital. The bank's CD loans were highly responsive to assessment area needs, demonstrated leadership, and supported activities that provided/created affordable housing in the bank's assessment area.

MD 48424 West Palm Beach-Boca Raton-Boynton Beach

FCB's level of CD lending had a significantly positive impact on its overall lending performance in the assessment area. FCB originated one (1) qualified CD loan totaling \$24.8 million, in the assessment area during the evaluation period. This volume represented 6.05 percent of Tier 1 Capital. The bank's CD loans were highly responsive to assessment area needs, demonstrated leadership, and supported activities that provided/created affordable housing in the bank's assessment area.

MSA 15980 Cape Coral-Fort Myers

FCB's level of CD lending had a neutral impact on its overall lending performance in the assessment area. FCB originated three (3) loans totaling \$150,000 in qualified CD loans in the assessment area during the evaluation period. This volume represented 0.04 percent of Tier 1 Capital. The bank's CD loans were responsive to assessment area needs and supported activities that promoted economic development in the assessment area.

A specific example of the CD loans originated during this evaluation period include:

- Three loans that totaled \$150,000 to an organization that coordinates the SBA 504 loan program with licensed community development corporations (CDC) to small business owners in thirteen states, including Florida.

MSA 34940 Naples-Marco Island

FCB's level of CD lending had a positive impact on its overall lending performance in the assessment area. FCB originated eight (8) loans totaling \$10.3 million in qualified CD loans in the assessment area during the evaluation period. This volume represented 2.52 percent of Tier 1 Capital. The bank's CD loans were responsive to assessment area needs, demonstrated leadership, and supported activities that provided and/or developed affordable housing.

Specific examples of the CD loans originated during this evaluation period include:

- A \$4.9 million loan to a rural water district located in a low-income census tract and an enterprise zone. Basic services will improve in the low-income census tract.
- A \$3.1 million loan to a company that provides affordable housing to low- and moderate-income families in the assessment area.

Product Innovation and Flexibility

FCB has engaged lending partnerships with over 46 community homeownership affordable housing organizations that provide down-payment, closing cost, homebuyer education, credit counseling and other forms of education and monetary/grant assistance. Funding programs throughout the markets include State Housing Initiative Programs (SHIP), Community Development Block Grant (CDBG) programs, Neighborhood Housing Assistance Programs (NSP), Housing Authority Self Sufficiency Programs and Section 8 Housing, and many others.

Based on the complexity of coordination and extensive time required to process and coordinate several closings on each loan for subsidies, there are only a few lenders in the market participating.

In addition to the lending product, FCB was an initial lender to approve and originate first time home-buyer loans through Community Land Trust (CLT) programs located in various markets in SE Florida and was recognized at the Florida Housing Coalition's Annual Conference in 2013. Other innovative affordable housing lending programs include the nationally recognized best practice H2H Homeless to Homeownership Program (Fort Lauderdale-Pompano Beach, Miami-Miami Beach-Kendall and West Palm Beach-Boca Raton-Boynton Beach assessment areas) by participating in financial workshops, monetary investments and loan originations noting over 275 active members, and the Veteran's Housing Program offered by the Affordable Homeownership Foundation, Inc. located in the Cape Coral –Fort Myers assessment areas. These partnerships reflect excellent responsiveness to meeting the credit needs within the assessment areas.

As a sponsor member of the Federal Home Loan Bank of Atlanta, FCB is an approved lender of the Affordable Homeownership Program (AHP) providing grants for down-payment/closing costs for first-time homebuyers, foreclosure recovery, veterans, and community stabilization. FCB also sponsored several FHLB Atlanta AHP Grant which were awarded a total of \$680,600 for three affordable housing projects in the Naples-Marco Island, Fort Lauderdale- Pompano Beach and Miami-Miami Beach assessment areas.

FCB's has dedicated three (3) fulltime CRA Affordable Housing Specialists in addition to the CRA Relationship Manager and CRA Officer to ensure appropriate geographic coverage and lending distribution throughout FCB's assessment areas.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the non-MSA Hendry County, MSA 19660 Deltona-Daytona Beach-Ormond Beach, MSA 35840 North Port-Bradenton-Sarasota, MSA 36740 Orlando-Kissimmee-Sanford, MSA 37340 Palm Bay-Melbourne-Titusville, MSA 38940 Port St. Lucie, MSA 39460 Punta Gorda, MSA 42680 Sebastian-Vero Beach, and MSA 45300 Tampa-St. Petersburg-Clearwater is not inconsistent with the bank's overall performance. 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 "High Satisfactory." Based on full-scope reviews, the bank's performance in the MD 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach, MD 33124 Miami-Miami Beach-Kendall, MD 48424 West Palm Beach-Boca Raton-Boynton, MSA 15980 Cape Coral-Fort Myers, and MSA 34940 Naples-Marco Island is good.

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

FCB had a good level of qualified investments and grants/donations. FCB invested \$20.5 million in government-sponsored mortgage-backed securities (MBS) located in the bank's full-scope assessment areas. In addition to investments in MBS, FCB made \$333 thousand in grants/donations to organizations that provide services to low- and moderate-income individuals and families. Total investments represent 5 percent of Tier 1 Capital. This volume of investments reflects positive in the bank's effort to service its community needs.

MD 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach

The bank's performance in the MD 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach is good. FCB had \$5.9 million in MBS and \$23 thousand in grants/donations. Grants and donations were invested in organizations that promoted affordable housing, services targeted to low- and moderate-income individuals, economic development, and revitalization and/or stabilization of low- and moderate-income census tracts. The total represented 1.44 percent of Tier 1 Capital.

MD 33124 Miami-Miami Beach-Kendall

The bank's performance in the MD 33124 Miami-Miami Beach-Kendall is good. FCB had \$4.5 million in MBS and \$55 thousand in grants/donations. Grants and donations were invested in organizations that promoted affordable housing, services targeted to low- and moderate-income individuals, economic development, and revitalization/stabilization of low- and moderate-income census tracts. The total represented 1.11 percent of Tier 1 Capital.

Noteworthy grants/donations during the evaluation period include:

- A donation of \$17,500 to an organization that provides financial education opportunities to low- and moderate-income students at five local high schools.
- A donation of \$2,500 to an organization that sponsors affordable housing education, credit/budget repair and mortgage prequalification process, grants/subsidies and mortgage readiness to low- and moderate-income individuals and families.

MD 48424 West Palm Beach-Boca Raton-Boynton Beach

The bank's performance in MD 48424 West Palm Beach-Boca Raton-Boynton is good. FCB had \$8.3 million in MBS and \$52 thousand in grants/donations. Grants and donations were invested in organizations that promoted affordable housing, services targeted to low- and moderate-income individuals, economic development, and revitalization/stabilization of low- and moderate-income census tracts. The total represented 2.04 percent of Tier 1 Capital.

Noteworthy grants/donations during the evaluation period include:

- A donation of \$7,500 to an organization that provides financial education opportunities to low- and moderate-income students at three local high schools.
- A donation of \$2,000 to an organization that provides assistance to small businesses through a business incubator program, technological assistance, and women's business center.

MSA 15980 Cape Coral-Ft Myers

The bank's performance in MSA 15980 Cape Coral-Fort Myers is good. FCB had \$997 thousand in MBS and \$58 thousand in grants/donations. Grants and donations were invested in organizations that promoted affordable housing, services targeted to low- and moderate-income individuals, economic development, and revitalization/stabilization of low- and moderate-income census tracts. The total represented 0.26 percent of Tier 1 Capital.

Noteworthy grants/donations during the evaluation period include:

- FCB partnered with many Small Business Development Centers located on the campuses of local colleges and universities within FCB's assessment areas. With the assistance of numerous FCB associates, FCB successfully sponsored/facilitated numerous workshops, summits and financial literacy programs for small business owners, aimed to assist in start-up opportunities and to more effectively deal with issues in the recessionary economy. Monetary investments provided tools, materials and other resources to support the programs. Colleges and universities campuses include Florida Gulf Coast University - MSA 15980 Cape Coral-Ft Myers, Naples-Marco Island.
- A donation of \$4,160 to an organization that provides homebuyer education and credit counseling to low- and moderate-income individuals in Lee County.
- A donation of \$1,500 to a Small Business Development Center that presents workshops to small businesses covering SBA lending, marketing, and budgeting in an economic downturn. This organization promotes economic development by retaining and assisting existing businesses to revitalize/stabilize its service area through financial education assistance.

MSA 34940 Naples-Macro Island

The bank's performance in MSA 34940 Naples-Marco Island is good. FCB had \$800 thousand in MBS and \$145 thousand in grants/donations. Grants and donations were invested in

organizations that promoted affordable housing, services targeted to low- and moderate-income individuals, economic development, and revitalization/stabilization of low- and moderate-income census tracts. The total represented 0.23 percent of Tier 1 Capital.

Noteworthy grants/donations during the evaluation period include:

- A \$10,000 donation to an organization that assists small business owners by offering a small business incubator to start small businesses, promote job creation, financial education, and economic development to very low-income migrant areas.
- A \$44,775 in-kind donation of office furniture to an organization that promotes economic development by attracting businesses to the assessment area which in turn provides much needed jobs.

Investments that impact multiple full-scope assessment areas:

MicroLending Programs

To create borrowing opportunities for small business start-up loans and expansion, FCB as the founding member, invested \$10,000 each in two (2) non-profit organizations in the Southwest Florida market. FCB worked with these agencies to create lending program guidelines and Memorandums of Understanding and was successful in raising additional capital from other lenders to match FCB's investments. These organizations include:

- Immokalee Business Development Center (Naples-Marco Island AA)
- Goodwill of Southwest Florida – MicroLending Enterprise Program which includes these two full-scope assessment areas:
 - MSA 34940 Naples–Marco Island (Collier County)
 - MSA 15980 Cape Coral–Fort Myers (Lee County)

In addition to the loan pool investments, FCB's Small Business Unit partnered with both organizations to process referred loans ranging from \$2,000 to \$5,000 to graduates from FCB's sponsored six (6) week small business educational workshops who are then eligible to apply where other lenders declined to process due to low loan amounts and unprofitability. FCB has associates on the Board of Directors, Finance Committee and other ad hoc committees of this organization. Other FCB investments to these organizations included providing workshop facilitators, funding for job creation, neighborhood stabilization and economic development improvement therefore reflects great responsiveness through demonstrated leadership in these assessment areas in meeting the credit needs of small businesses.

Women's Fund of Southwest Florida

As lead financial institution, FCB sponsored the first Individual Development Account (IDA) federally funded program application for SW Florida as the sole IDA provider of match funds for women's initiatives including small business, homeownership and furthering educational funding needs. With an initial investment of \$10,000, FCB committed an additional \$20,000 towards the nationally recognized 36 Hour Giving Challenge to encourage other community donors to support the agency's mission and the credit needs of low- to moderate-income women. FCB is in the final approval stages of a Community Development Financial Institution (CDFI) in the amount of \$500,000 through the partnership of Paragon Foundations, Inc.

Based on the investments made to date and technical support provided to this agency, FCB has demonstrated excellent penetration among the low- and moderate-income program clients through creative and innovative programs and initiatives. The organization impacts these two full-scope assessment areas: MSA 34940 Naples–Marco Island and MSA 15980 Cape Coral–Fort Myers.

Lending Consortiums/Partnerships Investments

Through legacy banks and new memberships, FCB participates in five (5) lending consortiums/partnerships. These partnerships require initial funds and/or commitments to lend to provide the expansion of affordable housing to low- and moderate-income communities and borrowers. FCB involvement in the consortiums varied from annual financial administrative support, lending commitments to originate, to attending partnership meetings as voting members, loan committees, and ad hoc committees thus allowing for excellent penetration of lending to both developers and individuals in need of affordable housing. These organizations by market coverage include:

- Community Reinvestment Group (CRG) – South Florida markets (since 2006)
- Florida Community Loan Fund – Statewide (since 2011)
- Florida Community Partners – Central Florida (since 2000)
- Treasurer Coast Enterprise Fund – Statewide (since 2011)
- Neighborhood Lending Partners – Statewide (since 2013)

EverFi

FCB invested \$37,500 with EverFi, Inc. a nationally leading financial literacy software company that partners with community partners and over 3,000 high schools in all 50 states and covers over 600 topics of on-line learning web based programs to teens during class time. FCB associates engaged with fourteen (14) local high school principals in various assessment areas by providing ten (10) modules of online financial literacy programs to over 1,440 low- and moderate-income students attending targeted lower income schools reflecting 50 percent or higher free or reduced lunches over a two year period. The program has been proven to create lasting effects as a community development tool by graduating entire classes of students who are financially capable and literate and is considered an excellent demonstration of providing financial literacy to LMI students. Assessment areas impacted by this program included: MD 33124 Miami-Miami Beach-Kendall, MD 48424 West Palm Beach-Boca Raton-Boynton Beach, and MSA 15980 Cape Coral-Fort Myers.

Conclusions for Areas Receiving limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the non-MSA Hendry County, MSA 19660 Deltona-Daytona Beach-Ormond Beach, MSA 35840 North Port-Bradenton-Sarasota, MSA 37340 Palm Bay-Melbourne-Titusville, MSA 38940 Port St. Lucie, MSA 39460 Punta Gorda, MSA 42680 Sebastian-Vero Beach, and MSA 45300 Tampa-St. Petersburg-Clearwater is weaker than the bank's overall "Low Satisfactory" performance under the Investment Test. The bank's performance in MSA 36740 Orlando-Kissimmee-Sanford is stronger than the bank's overall "Low Satisfactory" performance under the Investment Test. The combined performance in the limited-scope assessment areas was not

significant enough to affect the overall conclusion. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

FCB's performance under the service test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the MD 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach, MD 33124 Miami-Miami Beach-Kendall, MD 48424 West Palm Beach-Boca Raton-Boynton, MSA 15980 Cape Coral-Fort Myers, and MSA 34940 Naples-Marco Island is good.

Retail Banking Services

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

MD 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach

Delivery systems are readily accessible to all portions of the institution's assessment area(s). The bank's performance in the Fort Lauderdale-Pompano Beach-Deerfield AA is excellent. FCB offices are generally accessible to geographies and individuals of different income levels in the AA. FCB entered this AA with the purchase of the failed Coastal Peninsula Savings Bank assets from the FDIC in May 2011. The bank operates two offices in the area including its corporate headquarters housing a limited service branch and a full service office. FCB's facilities in this AA are located in a moderate-income census tract (headquarters/limited service branch) and an upper-income census tract. While no FCB office in this assessment is located in a low-income census tract, a small number of AA residents (4.13 percent) reside within the area's 19 low-income tracts, comprising 5.26 percent of the AA's tracts by income. The percentage of bank offices located in moderate-income tracts (50 percent) exceeds the portion of the population living in those areas. FCB did not close an office in this AA during the evaluation period.

Branch office hours and the level of services available do not vary in ways that inconvenience any portion of this AA, including low- and moderate-income areas. Office hours and services provided by AA facilities do not vary significantly from other AAs. The full service branch operates from 9:00 AM to 4:00 PM Monday through Thursday, and 9:00 AM to 6:00 PM on Fridays. The full service branch also has drive-thru facilities, with operating hours of 8:00 AM to 5:00 PM Monday through Thursday and 8:00 AM to 6:00 PM on Fridays. Operating hours are similar to those of major competitors in the AA. However, the limited service headquarters location is open from 8:30 AM to 5:00 PM Monday through Friday. Most bank services are available at the limited service location, but because of the lack of tellers, this location does not process transactions involving cash.

Due to the multicultural environment of South Florida, FCB annually surveys its employees on their ability to speak languages other than English. A list of employees and their spoken language ability is maintained to help customers for which English is not their first language. As of June 2013, FCB employs personnel that speak Spanish, French, Polish, and German, among other languages.

Alternative delivery channels offered by FCB in this AA include the aforementioned drive-thru teller lanes and an Automated Teller Machine (ATM) that accepts deposits at both locations. Further, FCB offers telephone banking, Internet banking (including Bill Pay), and mobile banking that allows access to account information and funds transfer using both Apple and Google's smartphone/tablet operating systems. FCB also allows its customers to access the ATM network owned by the Florida based Publix grocery store chain (*Presto!*). This arrangement gives its customers access to a network of 1,055 ATMs located at Publix stores throughout Florida, Georgia, Alabama, South Carolina, and Tennessee at no charge.

MD 33124 Miami-Miami Beach-Kendall

Delivery systems are reasonable accessible to essentially all portions of the institution's assessment area(s). The bank's performance in the Miami-Miami Beach-Kendall AA is adequate. FCB's branch distribution in the Miami AA is adequate, with reasonable access to facilities by individuals of different income levels. The bank operates four (4) branches in the Miami AA, all purchased from the FDIC during the evaluation period. These offices previously belonged to the failed Premier American Bank. None of these offices are located in a low-income census tract, but both the percentage of low-income tracts in the AA (5.98 percent) and low-income residents (5.06 percent) were both considered small. FCB operates one (1) branch in a moderate-income tract. The percentage of FCB branches operated in moderate-income tracts directly corresponds with the percentage of moderate-income tracts in the AA (25.48 percent) and moderate-income residents (26.89 percent). As noted, all of FCB's offices have been opened in this AA during the evaluation period, with a single location in a middle-income census tract being closed. This location previously housed the bank's corporate headquarters, which was moved to the Ft. Lauderdale AA in 2012. Overall, this branch's closure had a negligible effect on the availability of FCB's products and services in the AA.

Branch office hours and the level of services available do not vary in ways that inconvenience any portions of this AA, including low- and moderate-income areas. Two (2) of the four (4) branches in the AA have FCB's standard operating hours (9:00 AM to 4:00 PM, Monday through Thursday, and 9:00 AM to 6:00 PM on Fridays). These locations also have drive-thrus that are open from 8:00 AM to 5:00 PM, Monday through Thursday, and 8:00 AM to 6:00 PM on Fridays. The other two locations (including the branch located in a moderate-income tract) are open from 8:30 AM to 4:30 PM Monday through Thursday and 8:30 AM to 6:00 PM on Fridays. Neither of these branches offer drive-thru services. Management stated that it retained the hours of the previous bank as the local community preferred them. Operating hours are generally consistent with major AA competitors.

Services are generally not restricted in any of the branches operated in the Miami AA. While FCB has Automated Teller Machines (ATMs) in place at each of its locations in the AA, one of its branches in an upper-income tract does not accept deposits. This location's ATM is located in one of the branch's drive-thru lanes. As a measure of safety, bank management does not allow employees to service ATMs that are not physically attached to the building. A third party (Brink's) provides cash replenishment services for this machine.

Due to the multicultural environment of South Florida, FCB annually surveys its employees on their ability to speak languages other than English. A list of employees and their spoken language ability is maintained to help customers for which English is not their first language

As of June 2013, FCB employs personnel that speak Spanish, French, Polish, and German, among other languages.

Alternative delivery channels offered by FCB in this AA include the aforementioned drive-thru teller lanes and three ATMs that accept deposits. Further, FCB offers telephone banking, Internet banking (including Bill Pay), and mobile banking that allows access to account information and funds transfer using both Apple and Google's smartphone/tablet operating systems. FCB also allows its customers to access the ATM network owned by the Florida based Publix grocery store chain (*Presto!*). This arrangement gives its customers access to a network of 1,055 ATMs located at Publix stores throughout Florida, Georgia, Alabama, South Carolina, and Tennessee at no charge.

MD 48424 West Palm Beach-Boca Raton-Boynton

Delivery systems are reasonable accessible to essentially all portions of the institution's assessment area(s). The bank's performance in the West Palm Beach-Boca Raton-Boynton Beach AA is adequate. FCB's offices are reasonably accessible to geographies and individuals of different income levels in the AA. The bank operates four (4) branches in the West Palm Beach AA, purchased from the FDIC during the evaluation period and previously belonging to the failed Peninsula Bank. These offices included no location situated in a low- or moderate-income census tract. However, the population of low-income residents is small (4.88 percent) as are the number of low-income census tracts of the AA (6.23 percent). FCB's locations are accessible to both low-and moderate-income segments as half of its offices are immediately adjacent to multiple moderate-income census tracts. In this AA, FCB has significant competition from institutions with more established branching networks. As noted, all of FCB's offices were opened in this AA during the evaluation period with a single location in a middle-income census tract being closed. Overall, this branch's closure had a negligible effect on the availability of FCB's products and services in the AA.

Branch office hours and the level of services available do not vary in ways that inconvenience any portion of this AA, including low- and moderate-income areas. Office hours and services provided in the AA are similar to those offered in other AAs for three of the four branches (9:00 AM to 4:00 PM, Monday through Thursday and 9:00 AM to 6:00 PM, Fridays). Each of these branches have drive-thru lanes that open an hour earlier and close an hour later than the standard operating schedule. However, one branch does not have a drive-thru and as a result, has operating hours that allow for the branch's opening and closing of 30 minutes before and after the standard schedule. Operating hours are generally consistent with major AA competitors. With the exception of the lack of drive-thru banking at one branch, there is no difference in the level of services and products among FCB's locations in this AA.

Due to the multicultural environment of South Florida, FCB annually surveys its employees on their ability to speak languages other than English. A list of employees and their spoken language ability is maintained to help customers for which English is not their first language. As of June 2013, FCB employs personnel that speak Spanish, French, Polish, and German, among other languages.

Alternative delivery channels offered by FCB in this AA include the aforementioned drive-thru teller lanes and a single Automated Teller Machine (ATM) that accepts deposits. Three of the

branches in this AA were not constructed with the infrastructure to house an ATM. However, FCB offers telephone banking, Internet banking (including Bill Pay), and mobile banking that allows access to account information and funds transfer using both Apple and Google's smartphone/tablet operating systems. FCB also allows its customers to access the ATM network owned by the Florida based Publix grocery store chain (*Presto!*). This arrangement gives its customers access to a network of 1,055 ATMs located at Publix stores throughout Florida, Georgia, Alabama, South Carolina, and Tennessee at no charge.

MSA 15980 Cape Coral-Fort Myers

Delivery systems are reasonable accessible to essentially all portions of the institution's assessment area(s). The bank's performance in the Cape Coral-Ft. Myers AA is adequate. FCB's branch distribution in the Cape Coral AA is adequate, with reasonable access to facilities by individuals of different income levels. The bank operates five (5) branches in the Cape Coral AA, most of which were purchased from the FDIC during the evaluation period. These offices previously belonged to the failed Florida Community Bank, from which this bank's name was taken. An additional office was opened in the AA in August 2010 and is located in a middle-income census tract. None of FCB's offices in the Cape Coral AA are located in a low-income census tract, but both the percentage of low-income tracts (3.01 percent) and low-income residents (3.49 percent) in the AA were considered small. FCB operates one (1) branch in a moderate-income tract. The percentage of FCB branches located in moderate-income tracts compares similarly to the percentage of moderate-income tracts in the AA (19.28 percent) and moderate-income residents (19.26 percent). During the evaluation period, FCB closed one branch located in a middle-income census tract of the Cape Coral AA. Overall, this branch's closure had a negligible effect on the availability of FCB's products and services in the AA.

Branch office hours and the level of services available do not vary in ways that inconvenience any portions of this AA, including low- and moderate-income areas. All five (5) bank locations in this AA have operating hours of 9:00 AM to 4:00 PM, Monday through Thursday, and 9:00 AM to 6:00 PM on Fridays. Each branch has drive-thru facilities with hours of 8:00 AM to 5:00 PM Monday through Thursday and 8:00 to 6:00 PM on Fridays. Operating hours are generally consistent with major competitors in the AA.

Services are generally not restricted in any of the branches operated in the Cape Coral AA. However, while FCB has Automated Teller Machines (ATMs) in place at each of its locations in the AA, the ATM located in the moderate-income tract does not accept deposits. This branch's ATM is located in one of its drive-thru lanes. As a measure of safety, bank management does not allow employees to service ATMs that are not physically attached to the building. A third party (Brink's) provides cash replenishment services for this machine.

Due to the multicultural environment of South Florida, FCB annually surveys its employees on their ability to speak languages other than English. A list of employees and their spoken language ability is maintained to help customers for which English is not their first language. As of June 2013, FCB employs personnel that speak Spanish, French, Polish, and German, among other languages.

Alternative delivery channels offered by FCB in this AA include the aforementioned drive-thru teller lanes and three ATMs that accept deposits. Further, FCB offers telephone banking, Internet banking (including Bill Pay), and mobile banking that allows access to account information and funds transfer using both Apple and Google's smartphone/tablet operating systems. FCB also allows its customers to access the ATM network owned by the Florida based Publix grocery store chain (*Presto!*). This arrangement gives its customers access to a network of 1,055 ATMs located at Publix stores throughout Florida, Georgia, Alabama, South Carolina, and Tennessee at no charge.

MSA 34940 Naples-Marco Island

Delivery systems are reasonable accessible to essentially all portions of the institution's assessment area(s). The bank's performance in the Naples-Marco Island AA is adequate. FCB's branch distribution is excellent and is accessible to geographies and individuals of different income levels in the AA. The bank operates four (4) branches in the Naples AA. Two (2) of these branches were purchased from the FDIC, previously belonging to the failed Florida Community Bank, a precursor to the subject institution. These offices included no location situated in a low-income tract, but only six (6) of the AA's 73 tracts are designated as low-income. However, FCB has two (2) of its four (4) AA branches located in moderate-income census tracts. The percentage of bank branches located in moderate-income tracts (50 percent) significantly exceeds the percentage of both moderate-income tracts (20.55 percent) and moderate-income residents (20.27 percent) of the AA. In addition, each of the AA's low-income tracts are immediately adjacent to a tract housing an FCB location. As noted, all of FCB's offices have been opened in this AA during the evaluation period. Only one (1) office (located in a middle-income tract) has been closed in this AA during the evaluation period, done soon after FCB's acquisition of failed bank assets. The closure of the branch had no effect on the availability of FCB's products and services in the AA.

Branch office hours and the level of services available do not vary in ways that inconvenience any portion of this AA, including low- and moderate-income areas. Office hours and services provided in the AA are the same for each location (9:00 AM to 4:00 PM, Monday through Thursday and 9:00 AM to 6:00 PM, Fridays). Each of these branches have drive-thru lanes that open an hour earlier and close an hour later than the standard operating schedule. Each of FCB's locations in this AA have Automated Teller Machines (ATMs), but only (3) of the four (4) accept deposits. The ATM that does not is located in a middle-income tract. This location's ATM is located in one of the branch's drive-thru lanes. As a measure of safety, bank management does not allow employees to service ATMs that are not physically attached to the building. Operating hours are generally consistent with those of major AA competitors.

Due to the multicultural environment of South Florida, FCB annually surveys its employees on their ability to speak languages other than English. A list of employees and their spoken language ability is maintained to help customers for which English is not their first language. As of June 2013, FCB employs personnel that speak Spanish, French, Polish, and German, among other languages.

Alternative delivery channels offered by FCB in this AA include the aforementioned drive-thru teller lanes and ATMs. Further, FCB offers telephone banking, Internet banking (including Bill Pay), and mobile banking that allows access to account information and funds transfer using

both Apple and Google's smartphone/tablet operating systems. FCB also allows its customers to access the ATM network owned by the Florida based Publix grocery store chain (*Presto!*). This arrangement gives its customers access to a network of 1,055 ATMs located at Publix stores throughout Florida, Georgia, Alabama, South Carolina, and Tennessee at no charge.

Community Development Services

Community development service activities had a positive impact on the bank's overall performance within the Service Test. FCB's performance in providing community development services in the MD 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach was excellent. Performance in the MD 33124 Miami-Miami Beach-Kendall, MD 48424 West Palm Beach-Boca Raton-Boynton, MSA 15980 Cape Coral-Fort Myers, and MSA 34940 Naples-Marco Island was satisfactory. Community development services focused primarily on community services targeted to low- and moderate-income individuals. Bank employees participated in a variety of organizations and partnerships, some in leadership roles, that benefited low- and moderate-income individuals, promoted economic development, and provided affordable housing. They also provided technical assistance on financial and banking related matters to numerous community groups, low- and moderate-income persons and families, and small businesses.

MD 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach

FCB has an excellent record of participating in community development initiatives within the Fort Lauderdale AA. Community development initiatives have included programs for affordable housing, social services targeted to low- and moderate-income individuals, financial literacy, and economic development within the AA. Over the evaluation period, eleven FCB employees in this AA have been involved with seventy (70) qualified organizations performing activities related to the aforementioned missions. FCB employees have occupied or currently hold Board or member positions in fifty-three (53) of these organizations. A representative sample of AA entities in which FCB personnel have lent their financial expertise include the following:

- Broward County Housing Authority - Affordable housing,
- Broward SCORE - Economic development and small business mentoring,
- South Florida Community Land Trust - Affordable housing solutions, and
- Family Self Sufficiency of Broward - Economic self sufficiency/development of low- and moderate-income residents.

MD 33124 Miami-Miami Beach-Kendall

FCB has a satisfactory record of participating in community development initiatives within the Miami AA. Community development initiatives have included programs for affordable housing, social services targeted to low- and moderate-income individuals, financial literacy, and economic development within the AA. Over the evaluation period, seven (7) FCB employees in this AA have been involved with nineteen (19) qualified organizations performing activities related to the aforementioned missions. FCB employees in this AA have not shown significant leadership in these organizations as bank associates have occupied or currently hold Board or

member positions in only three (3) of these organizations. A representative sample of AA entities in which FCB personnel have lent their financial expertise include the following:

- Neighborhood Housing Services of South Florida - Affordable housing,
- Little Haiti Housing CDC - Affordable housing,
- Harry Chapin Food Bank - Food bank,
- Hispanic Unity of Florida - Economic development, financial literacy, and other services targeting the areas underserved Spanish speaking population, and
- Hialeah Housing Authority - Affordable housing.
- Opa-Locka CDC - Affordable housing,

MD 48424 West Palm Beach-Boca Raton-Boynton

FCB has a satisfactory record of participating in community development initiatives within the West Palm Beach AA. Community development initiatives have included programs for affordable housing, social services targeted to low- and moderate-income individuals, financial literacy, and economic development within the AA. Over the evaluation period, twelve (12) FCB employees in this AA have been involved with twenty-eight (28) qualified organizations performing activities related to the aforementioned missions. FCB employees have occupied or currently hold Board or member positions in ten (10) of these organizations. A representative sample of AA entities in which FCB personnel have lent their financial expertise include the following:

- Friends of Habitat - Affordable housing,
- Consumer Credit Management Services - Debt management and financial literacy,
- Milagro Center – Financial literacy to low- and moderate-income residents,
- Goodwill Microenterprises - Economic development,
- Knights of Pythagoras Mentoring Network - mentoring and support of “At Risk” low- and moderate-income children,
- Paragon Foundation - Economic development, and
- Catholic Charities - Social and poverty relief services.

MSA 15980 Cape Coral-Fort Myers

FCB has a satisfactory record of participating in community development initiatives within the Cape Coral AA. Community development initiatives have included programs for affordable housing, social services targeted to low- and moderate-income individuals, financial literacy, and economic development within the AA. Over the evaluation period, thirteen (13) FCB employees in this AA have been involved with thirty-one (31) qualified organizations performing activities related to the aforementioned missions. While the bank’s level of involvement in community development services is good, FCB employees in this AA have not shown significant leadership in these organizations as bank associates have occupied or currently hold Board or member positions in only four (4) of these organizations. A representative sample of AA entities in which FCB personnel have lent their financial expertise include the following:

- Affordable Homeownership Foundation - Affordable housing,

- Boys and Girls Clubs - Social services/mentoring targeting “At Risk” and low- and moderate-income children,
- Empowerment Alliance of SW Florida - Affordable housing and home ownership counseling,
- BAC Funding Corporation and Affiliates - An economic development entity providing capital for small businesses benefitting LMI areas and individuals,
- Cape Coral Caring Center - Provides food and utility bill assistance to needy people in the AA, and
- The AWOL Club - Substance abuse recovery, located in a moderate-income census tract of Cape Coral, FL.

MSA 34940 Naples-Marco Island

FCB has a satisfactory record of participating in community development initiatives within the Naples AA. Community development initiatives have included programs for affordable housing, social services targeted to low- and moderate-income individuals, financial literacy, and economic development within the AA. Over the evaluation period, fifteen (15) different FCB employees in this AA have been involved with twenty-eight (28) qualified organizations performing activities related to the aforementioned missions. FCB employees have occupied or currently hold Board or member positions in eleven (11) of these organizations. A representative sample of AA entities in which FCB personnel have lent their financial expertise include the following:

- Habitat for Humanity - Affordable housing,
- Immokalee Business Development Center - Economic development,
- Lehigh Community Services - Provides emergency support for LMI residents needing food, utilities, etc.,

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the service test in the non-MSA Hendry County, MSA 19660 Deltona-Daytona Beach-Ormond Beach, MSA 35840 North Port-Bradenton-Sarasota, MSA 36740 Orlando-Kissimmee-Sanford, MSA 37340 Palm Bay-Melbourne-Titusville, MSA 38940 Port St. Lucie, MSA 39460 Punta Gorda, MSA 42680 Sebastian-Vero Beach, and MSA 45300 Tampa-St. Petersburg-Clearwater is not inconsistent with the full-scope assessment areas.

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): (01/01/2010 to 09/30/2013) Investment and Service Tests and CD Loans: (01/01/2010 to 10/15/2013)	
Financial Institution	Products Reviewed	
Florida Community Bank, N.A. (FCB) Weston Corporate Center 1, 2500 Weston Road Weston, FL 33331	Home Purchase Loans Home Refinance Loans Loans to Businesses	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
MD 22744 Ft. Lauderdale- Pompano Beach-Deerfield Beach	Full-Scope	
MD 33124 Miami-Miami Beach- Kendall	Full-Scope	
MD 48424 West Palm Beach- Boca Raton-Boynton	Full-Scope	
MSA 15980 Cape Coral-Ft. Myers	Full-Scope	
MSA 34940 Naples-Marco Island	Full-Scope	
Hendry County	Limited-Scope	
MSA 19660 Deltona-Daytona Beach-Ormond Beach	Limited-Scope	
MSA 35840 North Port- Bradenton-Sarasota	Limited-Scope	
MSA 36740 Orlando-Kissimmee- Sanford	Limited-Scope	
MSA 37340 Palm Bay- Melbourne-Titusville	Limited-Scope	
MSA 38940 Port St. Lucie	Limited-Scope	
MSA 39460 Punta Gorda	Limited-Scope	
MSA 42680 Sebastian-Vero Beach	Limited-Scope	
MSA 45300 Tampa-St. Petersburg-Clearwater	Limited-Scope	

Appendix B: Market Profiles for Full-Scope Areas

MD 33124 Miami-Miami Beach-Kendall

Demographic Information for Full Scope Area: Miami-Miami Beach-Kendall 33124 for Census 2010						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	518	5.98	25.48	32.05	33.20	3.28
Population by Geography	2,496,435	5.06	26.89	34.46	33.01	0.58
Owner-Occupied Housing by Geography	480,532	1.67	19.87	35.55	42.90	0.01
Business by Geography	430,864	3.10	22.28	27.62	45.47	1.53
Farms by Geography	5,051	1.98	19.38	32.05	46.05	0.53
Family Distribution by Income Level	571,889	20.13	17.64	22.60	39.63	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	216,010	4.39	26.68	34.79	34.14	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		50,065 49,000 18%	Median Housing Value Unemployment Rate (August 2013)		295,738 7.3%	

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

Source: 2010 US Census and 2013 HUD updated MFI

Metropolitan Division (MD) 33124 is comprised of Miami-Dade County. Based on the 2010 Census, Miami-Dade County consists of 518 census tracts or geographies. The number of census tracts increased since the 2000 Census, which showed Miami-Dade County with 347 census tracts. Of the 518 census tracts 31 (6%) are low-income, 132 (25%) are moderate-income, 166 (32%) are middle-income, and 172 (33%) are upper-income. Seventeen tracts have no income designation because of low population levels. The City of Miami has the greatest concentration of low- and moderate-income geographies.

Miami-Dade is a densely populated urban center. According to the 2010 Census, the population has grown by 11 percent to 2.50 million, when compared to the 2000 Census population of 2.25 million. Approximately 16 percent of the population resides in the City of Miami. According to the Census Bureau's "QuickFacts" report, the level of homeowner occupancy declined from approximately 60 percent to 58 percent (2007-2011), as a result of the housing crisis. However, in low- and moderate-income geographies, the level of renter occupancy is high (70 percent and 51 percent, respectively), based on 2010 Census data. These geographies also represent high levels of households below the poverty level (44 percent and 27 percent, respectively), indicating a need for affordable rental housing. In the City of Miami, 27 percent of persons are living below the poverty level. These households would have difficulty qualifying for a home loan even at current housing prices.

Miami-Dade County has been severely impacted by the housing crisis. It consistently has some of the highest foreclosure rates in the state of Florida. The 2010 Census estimates the median value of owner-occupied housing units (2006-2010) in Miami-Dade County to be \$269,600. Median sales prices in Miami are reportedly at \$155,000 as of September 2013.

The HUD estimated median family income for 2011, 2012, and 2013 was \$51,900, \$52,600, and \$49,000, respectively. The poverty levels in the county indicate that low-income and many moderate-income families generally could not afford mortgage payments, as well as taxes and insurance, unless subsidies and other special programs provided them with assistance during the initial purchase. However, current economic conditions have reduced the availability of such assistance. Realtors report investors are buying lower priced homes for cash, reducing opportunities available to low- and moderate-income families that wish to occupy the property as their primary residence.

Local economic conditions remain weak. In Miami-Dade County, housing starts declined to the lowest level in a decade. Construction and construction-related jobs drove the local economy, and their decline led to high unemployment rates and the closing of many small businesses. According to Moody's Analysis, at the peak in 2005, 9,922 single-family housing permits were issued. In 2009, the number declined to 624, rising to 1,795 in 2012. The decline in jobs, particularly construction and construction-related jobs drove the county's unemployment rate to a high of 12.4 percent as of December 31, 2010. As of August 2013, the unemployment rate was 7.3 percent. These rates are higher than the state of Florida overall, which reported unemployment rates of 11.3 percent and 7 percent, respectively for the same time periods. These unemployment figures indicate a need for activities that support job creation, job placement and job training programs, and community services for low- and moderate-income persons and families.

Banking competition within the AA continues to be intense. In addition to community and mid-size banks, branches of the largest banks in the country operate in Miami-Dade County. As of June 30, 2013, according to the Federal Deposit Insurance Corporation (FDIC) website, there were 69 deposit taking financial institutions in Miami-Dade County operating 687 branches. FCB had a deposit market share of less than 1 percent and the market continues to be dominated by Wells Fargo and Bank of America.

During our review, we contacted an organization that develops/builds affordable housing for low- and moderate-income families. This contact stated there continues to be difficulty with people getting mortgage loans to purchase a house. There is a strong need for second mortgage subsidies to purchase loans in the loan range of \$30,000-\$50,000. For multi-family housing, there is a need for acquisition and construction money. It is also difficult to find lenders to do construction lending for single-family dwellings or for multi-family rehabilitation loans. There is also a need for micro loans for small businesses located in South Florida.

MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach

Demographic Information for Full Scope Area: Ft Lauderdale-Pompano Beach-Deerfield Beach for Census 2010						
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	18.63	18.73	23.50	39.14	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	157,157	3.90	27.52	35.54	33.04	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		62,619 61,700 12%	Median Housing Value Unemployment Rate (August 2013)		267,849 7.3%	

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

Source: 2010 US Census and 2013 HUD updated MFI

Metropolitan Division (MD) 22744 Fort Lauderdale-Pompano Beach-Deerfield Beach is comprised of Broward County. Based on the 2010 Census, the AA consists of 361 census tracts or geographies. The number of CTs increased since the 2000 Census, which reported 279 census tracts. Of the 361 census tracts 19 (5%) are low-income, 99 (27%) are moderate-income, 133 (37%) are middle-income, and 69 (30%) are upper-income. One tract has no income designation because of low population levels. For 2011, 2012, and 2013, the HUD Adjusted Median Family Income for Broward County was \$61,800, \$62,200, and \$61,700, respectively.

According to the 2010 Census, the total population of Broward County grew by 8 percent to 1.7 million, when compared to the 2000 Census total population of 1.6 million. Owner occupancy is high in the county reaching 57 percent based on the 2010 Census; however, in low-income geographies owner occupancy is only 2 percent, indicating a need for affordable rental housing.

The housing crisis is just as evident in Broward County, as it is in Miami-Dade County, and the housing crisis had a similar impact. During the evaluation period, RealtyTrac consistently listed Broward County among the top five counties in the United States having the highest level of home foreclosures. Housing prices in Broward County have declined since the beginning of 2006. According to the 2010 Census, the median value of owner-occupied housing (2007-2011) is \$246,800. According to the National Association of Realtors the median sales price of an existing single-family home declined to \$203,000 in the second quarter of 2013.

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

The economy of the AA continues to be weak, suffering from the housing crisis and related job losses. The unemployment rate in 2011, 2012, and August 2013, were reportedly 10.2 percent, 8.5 percent, and 7.3 percent. Job losses were primarily in the construction and related sectors. Tourism also experienced a decline, bottoming out in early 2009. This had a negative impact on service jobs, particularly in the restaurant industry. Healthcare continues to provide job opportunities. Tenet Healthcare is the largest employer in Broward County. Employment data shows a need for the creation of new jobs either through the creation of new businesses or the expansion of existing ones, which leads to a need for business loans.

Banking competition within the AA is high. In addition to community and mid-size banks, branches of the largest banks in the country operate in Broward County. As of June 30, 2013, according to the Federal Deposit Insurance Corporation (FDIC) website, there were 56 deposit taking financial institutions in Broward County operating 487 branches. FCB had a deposit market share of less than 1 percent and the market continues to be dominated by Bank of America and Wells Fargo.

Three community contacts were made for this assessment area. We contacted a national non-profit organization that constructs affordable housing for low- and moderate-income families and provides mortgages for those who cannot get mortgage loans from most banks in the community. The contact did not state any barriers for banks to provide services and the contact was not aware of any opportunities for local banks to participate in community development needs. An organization was contacted that provides a statewide source of flexible financing for delivering capital to low- and moderate-income communities to support community development projects by non-profit organizations throughout the state. The biggest challenge identified was access to loans for housing or grant funding to be able to do more for this organization's non-profit clients. The bank's current underwriting criteria makes it harder to sell homes by non-profits because low- and moderate-income individuals cannot find funding due to poor credit. This contact stated that the biggest barrier is that financial institutions should become more risk averse so that there would be more opportunities for their participation. The third contact was to a CDFI organization that is dedicated to small business lending. The contact stated there is a need for working capital loans. Opportunities exist for financial institutions to invest into a loan pool to support this organization's efforts to serve their clients without cost.

MD 48424 West Palm Beach-Boca Raton-Boynton

Demographic Information for Full Scope Area: West Palm Beach-Boca Raton-Boynton for Census 2010						
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	19.43	18.27	22.52	39.78	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	122,459	3.97	23.24	34.22	38.58	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		64,445 64,600 11%	Median Housing Value Unemployment Rate (August 2013)		288,519 7.5%	

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

Source: 2010 US Census and 2013 HUD updated MFI

Metropolitan Division (MD) 48424 West Palm Beach-Boca Raton-Boynton Beach is comprised of Palm Beach County.

Based on the 2010 Census, the Palm Beach County consists of 337 census tracts or geographies. The number of CTs increased since the 2000 Census which consisted of 265 census tracts. The 337 census tracts are comprised of 21 (6%) low-income, 84 (25%) moderate-income, 106 (31%) middle-income, and 118 (35%) upper-income. Eight tracts had no designation level because of low population levels. Clusters of low- and moderate-income geographies can be found in cities such as West Palm Beach, Riviera Beach, Lake Worth, and Boynton Beach along the eastern boundaries of the county, as well as inland around Lake Okeechobee in western cities such as Belle Glade and Pahokee.

The county has a population of approximately 1.3 million, based on the 2010 Census, which indicates an increase of 17 percent when compared to the 2000 Census population of 1.1 million. The HUD estimated median family income for Palm Beach County in 2011, 2012, and 2013 was \$63,300, \$64,100 and \$64,600 in 2013, respectively. Although in communities such as Riviera Beach, Belle Glade, and Pahokee, the level of population at or below the poverty level is approximately 32 percent. For the county overall, 13.3 percent of the population (2007-2011) lives below the poverty level, according to the Census Bureau's "QuickFacts" report. These levels of poverty reduce the opportunities for mortgage lending.

Housing prices have declined significantly since the highs of 2006 and foreclosure rates are high. Reports indicate that by mid-2013, the median value of home prices was approximately \$260,000, and the median value of condominium prices were approximately \$105,000. With these lower prices, some low-income families can afford to purchase home under special programs that provide closing cost assistance and/or subsidies, but as previously discussed,

the availability of funds for these programs declined and low-income buyers are forced to compete with investors paying cash.

The county's economy is largely based in the service and retail sectors. However, the western portion of the county has an agriculture base rooted in sugarcane. Many employment opportunities were focused on real estate construction and development. The decline in those sectors caused the unemployment rate to rise to 11 percent at the end of 2009. By August 2013, the unemployment rate fell to 7.5 percent according to the Bureau of Labor Statistics.

Banking competition within the AA is high. In addition to community and mid-size banks, branches of the largest banks in the country operate in Palm Beach County. As of June 30, 2013, according to the Federal Deposit Insurance Corporation (FDIC) website, there were 59 deposit taking financial institutions in Palm Beach County operating 491 branches. FCB had a deposit market share of less than 1 percent and the market continues to be dominated by Wells Fargo and Bank of America.

A community contact was made with a CDFI that is dedicated to small business lending. The contact stated there is a need for working capital loans. Opportunities exist for financial institutions to invest into a loan pool to support this organization's efforts to serve their clients without cost.

MSA 15980 Cape Coral-Ft Myers

Demographic Information for Full Scope Area: Cape Coral-Ft Myers 15980 for Census 2010						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	166	3.01	19.28	48.19	28.92	0.60
Population by Geography	618,754	3.49	19.26	52.98	24.27	0.00
Owner-Occupied Housing by Geography	183,928	1.32	14.17	55.62	28.89	0.00
Business by Geography	97,126	3.67	14.57	51.68	30.02	0.07
Farms by Geography	2,980	1.58	17.82	56.81	23.79	0.00
Family Distribution by Income Level	162,925	17.64	18.75	25.09	38.52	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	59,293	2.89	17.04	51.77	28.30	0.00
Median Family Income		58,950	Median Housing Value		243,186	
HUD Adjusted Median Family Income for 2013		56,300	Unemployment Rate (August 2013)		7.2%	
Households Below Poverty Level		10%				

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

Source: 2010 US Census and 2013 HUD updated MFI

Metropolitan Statistical Area (MSA) 15980 Cape Coral-Fort Myers is comprised of Lee County. The MSA is located in the southwest region of the state of Florida, known for attracting tourists and retirees. Cape Coral is the largest city in the AA and the second largest city in the state of Florida in terms of area. Fort Myers is the county seat and the second largest city in the AA. Fort Myers is known for the winter homes of Thomas Edison and Henry Ford, which are both tourist attractions in the region.

Based on the 2010 Census, the county consists of 166 census tracts or geographies, as compared to the 2000 Census, which consisted of 117 census tracts. The 166 census tracts are comprised of 5 (3%) low-income, 32 (19%) moderate-income, 80 (48%) middle-income, and 48 (29%) upper-income. One tract had no designation level because of low population levels. Over the past decade, Cape Coral-Fort Myers has been one of the fastest growing metro areas in the U.S., according to the 2010 Census Bureau. According to the 2010 Census, the total population is 618,754, which grew by 40 percent when compared to the 2000 Census population of 440,888.

The AA has a large number of retirees. The 2010 Census data shows 25 percent of households were retired, 40 percent of households in the area collect Social Security, while 66 percent of families are wage earners. The HUD estimated median family income for 2011, 2012, and mid-2013 was \$56,200, \$57,000, and \$56,300, respectively. For the county overall, 14 percent of the population (2007-2011) lives below the poverty level, according to the Census Bureau's "QuickFacts" report. These levels of poverty reduce the opportunities for mortgage lending.

Housing prices have declined significantly since the highs of 2005 and foreclosure rates remain high. Reports indicate that at year-ended 2010, home prices declined 60 percent to a median value of approximately \$123,000 and condominium prices declined 55 percent to a

median value of \$132,000, according to Zillow.com. With these lower prices, some low-income families can afford to purchase homes under special programs that provide closing cost assistance and/or subsidies, but as in the other counties discussed, the availability of funds for these programs declined and such buyers are forced to compete with investors paying cash.

The county's economy is primarily based in the service industry, followed by the retail and construction sector. According to Lee County's Southwest Florida Economic Development Office, the three major employers in the AA are Lee Memorial Health System (10,425 employees), Lee County School District (10,425 employees), and Publix Supermarket (4,404 employees). Given many employment opportunities focused on real estate construction and development, the decline in those sectors caused the employment rate to rise to 12.6 percent at the end of 2010. As of August 2013, the unemployment rate fell to 7.2 percent according to the Bureau of Labor Statistics.

Banking competition within Lee County is high. In addition to community and mid-size banks, branches of the largest banks in the country operate in Lee County. As of June 30, 2013, according to the Federal Deposit Insurance Corporation (FDIC) website, there were 36 deposit taking financial institutions in Lee County operating 228 branches. FCB had a deposit market share of 2.28 percent and the market continues to be dominated by Wells Fargo and Bank of America.

A local community group that develops/builds affordable housing for low- and moderate-income families expressed the need for affordable housing. Nevertheless, it indicated that banks are reluctant to partner with such groups to provide mortgage lending for these individuals due to bad credit histories. Other opportunities such as providing financial literacy training in schools and in corporations with local community organizations exist. The training could include homeownership, credit, foreclosure counseling, and information on general banking services to assist the non-banking population.

MSA 34940 Naples-Marco Island

Demographic Information for Full Scope Area: Naples-Marco Island 34940 for Census 2010						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	73	8.22	20.55	38.36	32.88	0.00
Population by Geography	321,520	9.05	20.27	43.40	27.27	0.00
Owner-Occupied Housing by Geography	91,397	2.40	16.42	46.03	35.15	0.00
Business by Geography	59,224	2.55	13.47	42.17	41.81	0.00
Farms by Geography	1,470	6.33	19.73	47.48	26.46	0.00
Family Distribution by Income Level	81,135	18.00	18.91	22.27	40.82	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	29,945	5.01	17.57	45.02	32.41	0.00
Median Family Income HUD Adjusted Median Family Income for 2013 Households Below Poverty Level		68,556 65,700 9%	Median Housing Value Unemployment Rate (August 2013)		427,396 7.4%	

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

Source: 2010 US Census and 2013 HUD updated MFI

Metropolitan Statistical Area (MSA) 34940 Naples-Marco Island is comprised of Collier County. Based on the 2010 Census, the county consists of 73 census tracts or geographies, as compared to the 2000 Census, which consisted of 52 census tracts. The 73 census tracts are comprised of 6 (8%) low-income, 15 (21%) moderate-income, 28 (38%) middle-income, and 24 (33%) upper-income. The greatest concentration of low- and moderate-income geographies can be found in the southern part of the county, around Immokalee and Everglades City. These areas are rural and have an agricultural base.

According to the 2010 Census, the total population of Collier County is 321,520, which grew by 28 percent when compared to the 2000 Census population of 251,377. The HUD estimated median family income for Collier County in 2011, 2012, and 2013, was \$71,800, \$72,800, and \$65,700, respectively, one of the highest in Florida. For the county overall, 13.5 percent of the population (2007-2011) lives below poverty level, according to the Census Bureau's "QuickFacts" report. These levels of poverty reduce the opportunities for mortgage lending to low-income and very low-income borrowers.

As with most metropolitan areas in Florida, the economy in the AA has experienced a downturn due to the national and local recession. Housing prices have declined significantly since the highs of 2006. Reports indicate that by September 2013, home prices declined 45 percent to a median value of approximately \$291,000 and condominium prices declined 49 percent to a median value of \$192,000. With subsidies and other forms of assistance, some low- and moderate-income families can afford to purchase a home in the county, but economic conditions are causing the availability of these assistance programs to decline.

The economy of the AA is based on tourism. Employment opportunities are focused in the services industry, trade and transportation industry, and leisure and hospitality. However, as

with the entire state of Florida, Collier County has experienced job losses, and a volatile housing market with a record number of delinquencies, foreclosures, and bankruptcies. The unemployment rate reached 11.6 percent in December 2011 according to the Bureau of Labor Statistics, but has declined to 7.4 percent as of August 2013, indicating some revival in the local economy. Naples Community Hospital is the largest employer in Collier County, followed by Publix Supermarket and Wal-Mart.

Banking competition within Collier County is high. In addition to community and mid-size banks, branches of the largest banks in the country operate in Collier County. As of June 30, 2013, according to the Federal Deposit Insurance Corporation (FDIC) website, there were 37 deposit taking financial institutions in Collier County operating 157 branches. FCB had a deposit market share of 3.10 percent and Fifth Third Bank and Wells Fargo dominate the market area.

Opportunities for community development lending, investments, and services are limited. Larger institutions in the AA are very competitive for the qualified investments and loans that are available. Community development opportunities include working with and providing financing to organizations whose mission is to provide affordable housing and/or community services for low- and moderate-income families, as well as economic development.

Community development investment options are available, but limited. Mortgage-backed securities backed by mortgages to low-and moderate-income borrowers are an option either directly or through loan funds that make investments in mortgage-backed securities. However, due to the limited ability of low- and moderate-income borrowers to purchase housing in the AA, the availability of mortgage-backed securities has declined.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

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

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME												
Geography: FLORIDA												
Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2013												
Assessment Area (2012):	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{***}
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach	10.24	74	36,485	10	3,181	0	0	4	12,844	88	52,510	2.74
MD 33124 Miami-Miami Beach-Kendall	13.80	75	73,566	29	7,515	0	0	17	39,170	121	120,251	23.78
MD 48424 West Palm Beach-Boca Raton-Boynton	5.47	40	26,676	6	3,121	0	0	1	24,800	47	54,597	15.32
MSA 15980 Cape Coral-Ft Myers	14.71	65	11,410	60	17,082	1	24	3	150	128	28,616	12.52
MSA 34940 Naples-Marco Island	18.24	93	39,388	56	16,682	3	712	8	10,346	160	67,128	7.09

^{*} Loan Data as of September 30, 2013. Rated area refers to either state or multi-state MA rating area.

^{**} The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2012.

^{***} Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Lending Volume (continued)

LENDING VOLUME												Geography: FLORIDA		Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2013	
Assessment Area (2012):	% of Rated Area Loans (#) in MA/AA [*]	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans ^{**}		Total Reported Loans		% of Rated Area Deposits in MA/AA ^{***}			
		#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)				
Limited Review:															
Hendry County FL 051 for Census	3.76	13	611	10	2,195	6	842	4	14,209	33	17,857	2.65			
MSA 19660 Deltona-Daytona Beach-Ormond Beach	7.18	11	2,211	49	11,610	2	465	1	185	63	14,471	4.12			
MSA 35840 North Port-Bradenton-Sarasota	2.51	10	3,581	10	5,228	0	0	2	4,500	22	13,309	4.32			
MSA 36740 Orlando-Kissimmee-Sanford	9.81	29	21,571	43	12,367	3	357	11	10,404	77	43,845	7.08			
MSA 37340 Palm Bay-Melbourne-Titusville	2.96	12	11,107	12	3,748	0	0	2	6,370	26	21,225	3.94			
MSA 38940 Port St Lucie	4.45	16	5,288	23	5,893	0	0	0	0	39	11,181	5.17			
MSA 39460 Punta Gorda	5.82	26	2,363	25	5,770	0	0	0	0	51	8,133	8.61			
MSA 42680 Sebastian-Vero Beach	0.34	0	0	3	795	0	0	0	0	3	795	1.16			
MSA 45300 Tampa-St Petersburg-Clearwater	0.91	3	380	5	1,201	0	0	0	0	8	1,581	1.50			

^{*} Loan Data as of September 30, 2013. Rated area refers to either state or multi-state MA rating area.

^{**} The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2012.

^{***} Deposit Data as of June 30, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 2013		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,							
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach	49	15.81	1.73	0.00	27.32	24.49	37.11	24.49	33.84	51.02	0.06	0.00	0.03	0.06	0.07
MD 33124 Miami-Miami Beach-Kendall	34	10.97	1.67	0.00	19.87	17.65	35.56	26.47	42.90	55.88	0.03	0.00	0.04	0.00	0.05
MD 48424 West Palm Beach-Boca Raton-Boynton	23	7.42	2.96	4.35	22.08	8.70	36.12	26.09	38.83	60.87	0.04	0.00	0.04	0.02	0.05
MSA 15980 Cape Coral-Ft Myers	54	17.42	1.32	3.70	14.17	46.30	55.62	31.48	28.89	18.52	0.06	0.00	0.09	0.05	0.05
MSA 34940 Naples-Marco Island	76	24.52	2.40	26.32	16.42	21.05	46.03	21.05	35.15	31.58	0.15	0.00	0.24	0.10	0.20

* Based on 2012 Peer Mortgage Data (USPR)

** 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 2. Geographic Distribution of Home Purchase Loans (continued)

Geographic Distribution: HOME PURCHASE 2013			Geography: FLORIDA								Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Limited Review:															
Hendry County FL 051 for Census	11	3.55	0.00	0.00	35.31	72.73	64.69	27.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00
MSA 19660 Deltona-Daytona Beach-Ormond Beach	3	0.97	1.29	0.00	15.68	100.00	54.75	0.00	28.28	0.00	0.02	0.00	0.16	0.00	0.00
MSA 35840 North Port-Bradenton-Sarasota	6	1.94	0.45	0.00	17.00	0.00	51.25	66.67	31.31	33.33	0.02	0.00	0.00	0.03	0.00
MSA 36740 Orlando-Kissimmee-Sanford	13	4.19	0.39	7.69	16.76	7.69	36.45	23.08	46.40	61.54	0.03	2.86	0.00	0.03	0.03
MSA 37340 Palm Bay-Melbourne-Titusville	4	1.29	1.18	0.00	18.83	0.00	46.92	25.00	33.06	75.00	0.04	0.00	0.00	0.00	0.10
MSA 38940 Port St Lucie	10	3.23	1.02	0.00	14.71	10.00	57.46	60.00	26.81	30.00	0.06	0.00	0.25	0.02	0.10
MSA 39460 Punta Gorda	26	8.39	0.00	0.00	6.26	23.08	76.48	73.08	17.26	3.85	0.08	0.00	0.00	0.06	0.21
MSA 42680 Sebastian-Vero Beach	0	0.00	1.08	0.00	11.88	0.00	58.73	0.00	28.31	0.00	0.00	0.00	0.00	0.00	0.00
MSA 45300 Tampa-St Petersburg-Clearwater	1	0.32	0.00	0.00	32.60	0.00	63.89	100.00	3.52	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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: HOME IMPROVEMENT 2013			Geography: FLORIDA								Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total*	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach	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 33124 Miami-Miami Beach-Kendall	2	50.00	1.67	0.00	19.87	0.00	35.56	50.00	42.90	50.00	0.24	0.00	0.00	0.39	0.23
MD 48424 West Palm Beach-Boca Raton-Boynton	0	0.00	2.96	0.00	22.08	0.00	36.12	0.00	38.83	0.00	0.00	0.00	0.00	0.00	0.00
MSA 15980 Cape Coral-Ft Myers	1	25.00	1.32	0.00	14.17	100.00	55.62	0.00	28.89	0.00	0.00	0.00	0.00	0.00	0.00
MSA 34940 Naples-Marco Island	0	0.00	2.40	0.00	16.42	0.00	46.03	0.00	35.15	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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 3. Geographic Distribution of Home Improvement Loans (continued)

Geographic Distribution: HOME IMPROVEMENT 2013			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,					Market Share (%) by Geography				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp	
Limited Review:																
Hendry County FL 051 for Census	0	0.00	0.00	0.00	35.31	0.00	64.69	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 19660 Deltona-Daytona Beach-Ormond Beach	1	25.00	1.29	0.00	15.68	0.00	54.75	0.00	28.28	100.00	0.28	0.00	0.00	0.00	1.14	
MSA 35840 North Port-Bradenton-Sarasota	0	0.00	0.45	0.00	17.00	0.00	51.25	0.00	31.31	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 36740 Orlando-Kissimmee-Sanford	0	0.00	0.39	0.00	16.76	0.00	36.45	0.00	46.40	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 37340 Palm Bay-Melbourne-Titusville	0	0.00	1.18	0.00	18.83	0.00	46.92	0.00	33.06	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 38940 Port St Lucie	0	0.00	1.02	0.00	14.71	0.00	57.46	0.00	26.81	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 39460 Punta Gorda	0	0.00	0.00	0.00	6.26	0.00	76.48	0.00	17.26	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 42680 Sebastian-Vero Beach	0	0.00	1.08	0.00	11.88	0.00	58.73	0.00	28.31	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 45300 Tampa-St Petersburg-Clearwater	0	0.00	0.00	0.00	32.60	0.00	63.89	0.00	3.52	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2012 Peer Mortgage Data (USPR)

** 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 2013		Geography: FLORIDA								Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,					
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach	25	19.69	1.73	0.00	27.32	16.00	37.11	20.00	33.84	64.00	0.03	0.00	0.05	0.03	0.03
MD 33124 Miami-Miami Beach-Kendall	20	15.75	1.67	0.00	19.87	5.00	35.56	30.00	42.90	65.00	0.05	0.00	0.04	0.03	0.07
MD 48424 West Palm Beach-Boca Raton-Boynton	16	12.60	2.96	0.00	22.08	0.00	36.12	31.25	38.83	68.75	0.02	0.00	0.00	0.02	0.03
MSA 15980 Cape Coral-Ft Myers	10	7.87	1.32	0.00	14.17	0.00	55.62	70.00	28.89	30.00	0.04	0.00	0.00	0.07	0.00
MSA 34940 Naples-Marco Island	16	12.60	2.40	0.00	16.42	6.25	46.03	25.00	35.15	68.75	0.08	0.00	0.12	0.00	0.17

* Based on 2012 Peer Mortgage Data (USPR)

** 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 4. Geographic Distribution of Home Mortgage Refinance Loans (continued)

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2013					Market Share (%) by Geography				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp	
Limited Review:																
Hendry County FL 051 for Census	2	1.57	0.00	0.00	35.31	50.00	64.69	50.00	0.00	0.00	1.16	0.00	2.13	0.79	0.00	
MSA 19660 Deltona-Daytona Beach-Ormond Beach	6	4.72	1.29	0.00	15.68	16.67	54.75	0.00	28.28	83.33	0.06	0.00	0.10	0.00	0.14	
MSA 35840 North Port-Bradenton-Sarasota	4	3.15	0.45	0.00	17.00	50.00	51.25	0.00	31.31	50.00	0.02	0.00	0.12	0.00	0.03	
MSA 36740 Orlando-Kissimmee-Sanford	15	11.81	0.39	0.00	16.76	6.67	36.45	6.67	46.40	86.67	0.03	0.00	0.03	0.01	0.03	
MSA 37340 Palm Bay-Melbourne-Titusville	5	3.94	1.18	0.00	18.83	20.00	46.92	20.00	33.06	60.00	0.02	0.00	0.00	0.00	0.04	
MSA 38940 Port St Lucie	6	4.72	1.02	0.00	14.71	16.67	57.46	66.67	26.81	16.67	0.05	0.00	0.00	0.06	0.04	
MSA 39460 Punta Gorda	0	0.00	0.00	0.00	6.26	0.00	76.48	0.00	17.26	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 42680 Sebastian-Vero Beach	0	0.00	1.08	0.00	11.88	0.00	58.73	0.00	28.31	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 45300 Tampa-St Petersburg-Clearwater	2	1.57	0.00	0.00	32.60	0.00	63.89	100.00	3.52	0.00	0.04	0.00	0.00	0.05	0.00	

* Based on 2012 Peer Mortgage Data (USPR)

** 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: MULTIFAMILY		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2013					Market Share (%) by Geography				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach	0	0.00	4.53	0.00	36.14	0.00	41.64	0.00	17.69	0.00	0.00	0.00	0.00	0.00	0.00	
MD 33124 Miami-Miami Beach-Kendall	18	72.00	8.41	0.00	28.73	50.00	32.26	44.44	30.60	5.56	2.38	0.00	3.57	2.22	2.78	
MD 48424 West Palm Beach-Boca Raton-Boynton	1	4.00	6.39	0.00	31.55	0.00	33.58	100.00	28.47	0.00	2.00	0.00	0.00	6.67	0.00	
MSA 15980 Cape Coral-Ft Myers	0	0.00	7.80	0.00	15.02	0.00	39.74	0.00	37.44	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 34940 Naples-Marco Island	1	4.00	3.02	0.00	13.85	100.00	39.45	0.00	43.68	0.00	5.26	0.00	25.00	0.00	0.00	

* Based on 2012 Peer Mortgage Data (USPR)

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

Table 5. Geographic Distribution of Multifamily Loans (continued)

Geographic Distribution: MULTIFAMILY		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa ll	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Limited Review:																
Hendry County FL 051 for Census	0	0.00	0.00	0.00	32.23	0.00	67.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 19660 Deltona-Daytona Beach-Ormond Beach	1	4.00	7.93	0.00	27.19	100.00	37.17	0.00	27.72	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 35840 North Port-Bradenton-Sarasota	0	0.00	0.78	0.00	14.20	0.00	31.59	0.00	53.43	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 36740 Orlando-Kissimmee-Sanford	1	4.00	2.05	0.00	40.91	0.00	38.98	100.00	18.07	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 37340 Palm Bay-Melbourne-Titusville	3	12.00	5.84	33.33	24.02	33.33	44.56	33.33	25.58	0.00	11.76	0.00	20.00	20.00	0.00	
MSA 38940 Port St Lucie	0	0.00	1.24	0.00	19.26	0.00	41.19	0.00	38.31	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 39460 Punta Gorda	0	0.00	0.00	0.00	10.92	0.00	69.38	0.00	19.69	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 42680 Sebastian-Vero Beach	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	0.00	
MSA 45300 Tampa-St Petersburg-Clearwater	0	0.00	0.00	0.00	55.30	0.00	42.40	0.00	2.30	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2012 Peer Mortgage Data (USPR)

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: FLORIDA						Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2013						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach	10	2.93	3.36	20.00	24.59	50.00	33.82	20.00	38.22	10.00	0.01	0.06	0.02	0.01	0.00
MD 33124 Miami-Miami Beach-Kendall	29	8.50	3.10	3.45	22.28	10.34	27.62	17.24	45.47	68.97	0.01	0.06	0.01	0.01	0.01
MD 48424 West Palm Beach-Boca Raton-Boynton	6	1.76	3.49	0.00	18.91	33.33	31.53	33.33	45.89	33.33	0.01	0.00	0.00	0.00	0.01
MSA 15980 Cape Coral-Ft Myers	60	17.60	3.67	18.33	14.57	30.00	51.68	38.33	30.02	13.33	0.34	1.51	0.86	0.33	0.07
MSA 34940 Naples-Marco Island	56	16.42	2.55	19.64	13.47	19.64	42.17	26.79	41.81	33.93	0.29	2.96	0.53	0.27	0.16

* Based on 2012 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 6. Geographic Distribution of Small Loans to Businesses (continued)

Geographic Distribution: SMALL LOANS TO BUSINESSES 2013			Geography: FLORIDA						Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Limited Review:															
Hendry County FL 051 for Census	10	2.93	0.00	0.00	27.25	40.00	72.75	60.00	0.00	0.00	1.11	0.00	2.15	0.96	0.00
MSA 19660 Deltona- Daytona Beach- Ormond Beach	49	14.37	3.35	8.16	20.56	24.49	48.31	34.69	27.78	32.65	0.41	0.66	0.42	0.26	0.65
MSA 35840 North Port-Bradenton- Sarasota	10	2.93	0.49	0.00	20.16	40.00	42.58	20.00	36.77	40.00	0.05	0.00	0.17	0.00	0.05
MSA 36740 Orlando- Kissimmee-Sanford	43	12.61	0.63	0.00	21.17	20.93	33.84	46.51	44.35	32.56	0.08	0.00	0.08	0.11	0.06
MSA 37340 Palm Bay-Melbourne- Titusville	12	3.52	1.69	0.00	22.61	50.00	42.46	16.67	33.20	33.33	0.13	0.00	0.29	0.06	0.10
MSA 38940 Port St Lucie	23	6.74	1.84	8.70	18.24	30.43	53.24	34.78	26.58	26.09	0.11	0.00	0.14	0.09	0.14
MSA 39460 Punta Gorda	25	7.33	0.00	0.00	6.80	8.00	78.33	92.00	14.87	0.00	0.49	0.00	0.00	0.64	0.00
MSA 42680 Sebastian-Vero Beach	3	0.88	3.80	0.00	8.84	33.33	57.13	0.00	30.03	66.67	0.03	0.00	0.00	0.00	0.10
MSA 45300 Tampa- St Petersburg- Clearwater	5	1.47	0.00	0.00	36.87	80.00	58.88	20.00	4.25	0.00	0.14	0.00	0.27	0.08	0.00

* Based on 2012 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 FARMS 2013			Geography: FLORIDA								Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% 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:															
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach	0	0.00	3.31	0.00	28.02	0.00	32.95	0.00	35.73	0.00	0.00	0.00	0.00	0.00	0.00
MD 33124 Miami-Miami Beach-Kendall	0	0.00	1.98	0.00	19.38	0.00	32.05	0.00	46.05	0.00	0.00	0.00	0.00	0.00	0.00
MD 48424 West Palm Beach-Boca Raton-Boynton	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	0.00
MSA 15980 Cape Coral-Ft Myers	1	6.67	1.58	0.00	17.82	0.00	56.81	100.00	23.79	0.00	2.86	0.00	0.00	7.14	0.00
MSA 34940 Naples-Marco Island	3	20.00	6.33	66.67	19.73	0.00	47.48	33.33	26.46	0.00	11.76	50.00	0.00	12.50	0.00

* Based on 2012 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 7. Geographic Distribution of Small Loans to Farms (continued)

Geographic Distribution: SMALL LOANS TO FARMS 2013			Geography: FLORIDA								Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms*	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Limited Review:															
Hendry County FL 051 for Census	6	40.00	0.00	0.00	41.48	100.00	58.52	0.00	0.00	0.00	38.46	0.00	71.43	0.00	0.00
MSA 19660 Deltona-Daytona Beach-Ormond Beach	2	13.33	1.57	0.00	20.64	0.00	50.91	0.00	26.88	100.00	3.70	0.00	0.00	0.00	10.00
MSA 35840 North Port-Bradenton-Sarasota	0	0.00	0.65	0.00	17.73	0.00	49.68	0.00	31.94	0.00	0.00	0.00	0.00	0.00	0.00
MSA 36740 Orlando-Kissimmee-Sanford	3	20.00	0.58	0.00	18.61	0.00	37.02	0.00	43.79	100.00	3.92	0.00	0.00	0.00	6.67
MSA 37340 Palm Bay-Melbourne-Titusville	0	0.00	1.62	0.00	22.40	0.00	46.00	0.00	29.99	0.00	0.00	0.00	0.00	0.00	0.00
MSA 38940 Port St Lucie	0	0.00	1.32	0.00	21.86	0.00	52.52	0.00	24.31	0.00	0.00	0.00	0.00	0.00	0.00
MSA 39460 Punta Gorda	0	0.00	0.00	0.00	6.95	0.00	75.69	0.00	17.37	0.00	0.00	0.00	0.00	0.00	0.00
MSA 42680 Sebastian-Vero Beach	0	0.00	1.10	0.00	17.64	0.00	63.62	0.00	17.42	0.00	0.00	0.00	0.00	0.00	0.00
MSA 45300 Tampa-St Petersburg-Clearwater	0	0.00	0.00	0.00	29.34	0.00	59.76	0.00	10.90	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 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 PURCHASE		Geography: FLORIDA								Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2013					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans***	% Families ¹	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach	49	15.81	18.63	15.22	18.73	15.22	23.50	19.57	39.14	50.00	0.06	0.08	0.03	0.10	0.05
MD 33124 Miami-Miami Beach-Kendall	34	10.97	20.13	12.12	17.64	21.21	22.60	18.18	39.63	48.48	0.04	0.00	0.00	0.03	0.05
MD 48424 West Palm Beach-Boca Raton-Boynton	23	7.42	19.43	4.55	18.27	4.55	22.52	9.09	39.78	81.82	0.04	0.00	0.00	0.03	0.06
MSA 15980 Cape Coral-Ft Myers	54	17.42	17.64	29.63	18.75	31.48	25.09	9.26	38.52	29.63	0.07	0.00	0.00	0.11	0.08
MSA 34940 Naples-Marco Island	76	24.52	18.00	52.63	18.91	5.26	22.27	2.63	40.82	39.47	0.17	0.40	0.00	0.00	0.22

* Based on 2012 Peer Mortgage Data (USPR)

** 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 2.3% 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 8. Borrower Distribution of Home Purchase Loans (continued)

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2013							
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans***	% Families ²	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Limited Review:															
Hendry County FL 051 for Census	11	3.55	20.23	54.55	20.42	45.45	21.05	0.00	38.30	0.00	0.00	0.00	0.00	0.00	0.00
MSA 19660 Deltona-Daytona Beach-Ormond Beach	3	0.97	18.13	66.67	18.45	33.33	24.38	0.00	39.04	0.00	0.02	0.18	0.00	0.00	0.00
MSA 35840 North Port-Bradenton-Sarasota	6	1.94	17.97	0.00	18.70	0.00	24.60	16.67	38.73	83.33	0.02	0.00	0.00	0.10	0.00
MSA 36740 Orlando-Kissimmee-Sanford	13	4.19	18.83	0.00	18.53	8.33	24.19	8.33	38.46	83.33	0.04	0.00	0.00	0.00	0.07
MSA 37340 Palm Bay-Melbourne-Titusville	4	1.29	18.08	0.00	19.41	0.00	23.54	33.33	38.97	66.67	0.04	0.00	0.00	0.06	0.06
MSA 38940 Port St Lucie	10	3.23	17.89	10.00	20.12	40.00	22.59	0.00	39.40	50.00	0.07	0.22	0.00	0.00	0.12
MSA 39460 Punta Gorda	26	8.39	15.64	61.54	19.45	19.23	26.47	7.69	38.44	11.54	0.09	0.00	0.26	0.22	0.00
MSA 42680 Sebastian-Vero Beach	0	0.00	19.19	0.00	17.63	0.00	24.26	0.00	38.92	0.00	0.00	0.00	0.00	0.00	0.00
MSA 45300 Tampa-St Petersburg-Clearwater	1	0.32	17.37	0.00	20.33	0.00	23.48	0.00	38.83	100.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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 2.3% of loans originated and purchased by bank.

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 2013			Geography: FLORIDA						Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ³	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach	0	0.00	18.63	0.00	18.73	0.00	23.50	0.00	39.14	0.00	0.00	0.00	0.00	0.00	0.00
MD 33124 Miami-Miami Beach-Kendall	2	50.00	20.13	0.00	17.64	0.00	22.60	0.00	39.63	100.00	0.26	0.00	0.00	0.00	0.44
MD 48424 West Palm Beach-Boca Raton-Boynton	0	0.00	19.43	0.00	18.27	0.00	22.52	0.00	39.78	0.00	0.00	0.00	0.00	0.00	0.00
MSA 15980 Cape Coral-Ft Myers	1	25.00	17.64	0.00	18.75	100.00	25.09	0.00	38.52	0.00	0.00	0.00	0.00	0.00	0.00
MSA 34940 Naples-Marco Island	0	0.00	18.00	0.00	18.91	0.00	22.27	0.00	40.82	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2012 Peer Mortgage Data (USPR)

^{**} 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.

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

³ 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 (continued)

Borrower Distribution: HOME IMPROVEMENT 2013		Geography: FLORIDA								Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,					
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ⁴	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Limited Review:															
Hendry County FL 051 for Census	0	0.00	20.23	0.00	20.42	0.00	21.05	0.00	38.30	0.00	0.00	0.00	0.00	0.00	0.00
MSA 19660 Deltona-Daytona Beach-Ormond Beach	1	25.00	18.13	100.00	18.45	0.00	24.38	0.00	39.04	0.00	0.29	1.43	0.00	0.00	0.00
MSA 35840 North Port-Bradenton-Sarasota	0	0.00	17.97	0.00	18.70	0.00	24.60	0.00	38.73	0.00	0.00	0.00	0.00	0.00	0.00
MSA 36740 Orlando-Kissimmee-Sanford	0	0.00	18.83	0.00	18.53	0.00	24.19	0.00	38.46	0.00	0.00	0.00	0.00	0.00	0.00
MSA 37340 Palm Bay-Melbourne-Titusville	0	0.00	18.08	0.00	19.41	0.00	23.54	0.00	38.97	0.00	0.00	0.00	0.00	0.00	0.00
MSA 38940 Port St Lucie	0	0.00	17.89	0.00	20.12	0.00	22.59	0.00	39.40	0.00	0.00	0.00	0.00	0.00	0.00
MSA 39460 Punta Gorda	0	0.00	15.64	0.00	19.45	0.00	26.47	0.00	38.44	0.00	0.00	0.00	0.00	0.00	0.00
MSA 42680 Sebastian-Vero Beach	0	0.00	19.19	0.00	17.63	0.00	24.26	0.00	38.92	0.00	0.00	0.00	0.00	0.00	0.00
MSA 45300 Tampa-St Petersburg-Clearwater	0	0.00	17.37	0.00	20.33	0.00	23.48	0.00	38.83	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2012 Peer Mortgage Data (USPR)

** 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.

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

⁴ 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 REFINANCE 2013			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,					Market Share				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ⁵	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{***}						
Full Review:																
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach	25	19.69	18.63	0.00	18.73	8.70	23.50	4.35	39.14	86.96	0.03	0.00	0.06	0.00	0.04	
MD 33124 Miami-Miami Beach-Kendall	20	15.75	20.13	5.26	17.64	5.26	22.60	5.26	39.63	84.21	0.06	0.06	0.05	0.03	0.06	
MD 48424 West Palm Beach-Boca Raton-Boynton	16	12.60	19.43	6.67	18.27	6.67	22.52	13.33	39.78	73.33	0.02	0.06	0.00	0.02	0.02	
MSA 15980 Cape Coral-Ft Myers	10	7.87	17.64	20.00	18.75	20.00	25.09	0.00	38.52	60.00	0.04	0.24	0.13	0.00	0.01	
MSA 34940 Naples-Marco Island	16	12.60	18.00	6.67	18.91	13.33	22.27	6.67	40.82	73.33	0.07	0.00	0.11	0.08	0.07	

^{*} Based on 2012 Peer Mortgage Data (USPR)

^{**} 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 7.9% of loans originated and purchased by bank.

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans (continued)

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA		Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2013											
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ⁶	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{***}	Overa II	Low	Mod	Mid	Upp
Limited Review:															
Hendry County FL 051 for Census	2	1.57	20.23	0.00	20.42	0.00	21.05	50.00	38.30	50.00	1.37	0.00	0.00	3.45	1.09
MSA 19660 Deltona-Daytona Beach-Ormond Beach	6	4.72	18.13	16.67	18.45	0.00	24.38	0.00	39.04	83.33	0.07	0.13	0.00	0.00	0.12
MSA 35840 North Port-Bradenton-Sarasota	4	3.15	17.97	0.00	18.70	0.00	24.60	0.00	38.73	100.00	0.01	0.00	0.00	0.00	0.02
MSA 36740 Orlando-Kissimmee-Sanford	15	11.81	18.83	0.00	18.53	0.00	24.19	0.00	38.46	100.00	0.03	0.00	0.00	0.00	0.04
MSA 37340 Palm Bay-Melbourne-Titusville	5	3.94	18.08	0.00	19.41	20.00	23.54	40.00	38.97	40.00	0.02	0.00	0.06	0.00	0.02
MSA 38940 Port St Lucie	6	4.72	17.89	20.00	20.12	40.00	22.59	0.00	39.40	40.00	0.04	0.00	0.18	0.00	0.02
MSA 39460 Punta Gorda	0	0.00	15.64	0.00	19.45	0.00	26.47	0.00	38.44	0.00	0.00	0.00	0.00	0.00	0.00
MSA 42680 Sebastian-Vero Beach	0	0.00	19.19	0.00	17.63	0.00	24.26	0.00	38.92	0.00	0.00	0.00	0.00	0.00	0.00
MSA 45300 Tampa-St Petersburg-Clearwater	2	1.57	17.37	0.00	20.33	100.00	23.48	0.00	38.83	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2012 Peer Mortgage Data (USPR)

^{**} 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 7.9% of loans originated and purchased by bank.

⁶ 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 LOANS TO BUSINESSES 2013			Geography: FLORIDA		Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Businesses***	% BANK****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach	10	2.93	72.52	20.00	40.00	10.00	50.00	0.01	0.00
MD 33124 Miami-Miami Beach-Kendall	29	8.50	70.89	34.48	41.38	27.59	31.03	0.01	0.01
MD 48424 West Palm Beach-Boca Raton-Boynton	6	1.76	72.17	33.33	16.67	33.33	50.00	0.01	0.01
MSA 15980 Cape Coral-Ft Myers	60	17.60	73.85	55.00	31.67	21.67	46.67	0.34	0.52
MSA 34940 Naples-Marco Island	56	16.42	72.49	35.71	33.93	21.43	44.64	0.29	0.29

* Based on 2012 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 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 12.90% of small loans to businesses originated and purchased by the bank.

Table 11. Borrower Distribution of Small Loans to Businesses (continued)

Borrower Distribution: SMALL LOANS TO BUSINESSES 2013		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share [*]	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Limited Review:									
Hendry County FL 051 for Census	10	2.93	70.02	20.00	60.00	20.00	20.00	1.11	1.18
MSA 19660 Deltona-Daytona Beach-Ormond Beach	49	14.37	72.93	63.27	36.73	26.53	36.73	0.41	0.57
MSA 35840 North Port-Bradenton-Sarasota	10	2.93	73.32	50.00	0.00	10.00	90.00	0.05	0.07
MSA 36740 Orlando-Kissimmee-Sanford	43	12.61	71.91	39.53	34.88	27.91	37.21	0.08	0.07
MSA 37340 Palm Bay-Melbourne-Titusville	12	3.52	72.96	25.00	25.00	16.67	58.33	0.13	0.12
MSA 38940 Port St Lucie	23	6.74	74.93	39.13	34.78	34.78	30.43	0.11	0.10
MSA 39460 Punta Gorda	25	7.33	74.09	44.00	36.00	40.00	24.00	0.49	0.65
MSA 42680 Sebastian-Vero Beach	3	0.88	58.33	100.00	66.67	0.00	33.33	0.03	0.08
MSA 45300 Tampa-St Petersburg-Clearwater	5	1.47	75.36	80.00	40.00	20.00	40.00	0.14	0.36

^{*} Based on 2012 Peer Small Business Data -- US and PR

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

^{***} Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 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 12.90% 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 FARMS 2013			Geography: FLORIDA		Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30,				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach	0	0.00	97.54	0.00	0.00	0.00	0.00	0.00	0.00
MD 33124 Miami-Miami Beach-Kendall	0	0.00	97.07	0.00	0.00	0.00	0.00	0.00	0.00
MD 48424 West Palm Beach-Boca Raton-Boynton	0	0.00	96.75	0.00	0.00	0.00	0.00	0.00	0.00
MSA 15980 Cape Coral-Ft Myers	1	6.67	97.28	0.00	100.00	0.00	0.00	2.86	0.00
MSA 34940 Naples-Marco Island	3	20.00	95.37	100.00	33.33	33.33	33.33	11.76	25.00

^{*} Based on 2012 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 26.67% of small loans to farms originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms (continued)

Borrower Distribution: SMALL LOANS TO FARMS		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2013				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Limited Review:									
Hendry County FL 051 for Census	6	40.00	89.08	50.00	66.67	16.67	16.67	38.46	66.67
MSA 19660 Deltona-Daytona Beach-Ormond Beach	2	13.33	98.47	100.00	0.00	100.00	0.00	3.70	7.14
MSA 35840 North Port-Bradenton-Sarasota	0	0.00	97.89	0.00	0.00	0.00	0.00	0.00	0.00
MSA 36740 Orlando-Kissimmee-Sanford	3	20.00	96.37	33.33	33.33	66.67	0.00	3.92	4.00
MSA 37340 Palm Bay-Melbourne-Titusville	0	0.00	98.29	0.00	0.00	0.00	0.00	0.00	0.00
MSA 38940 Port St Lucie	0	0.00	96.29	0.00	0.00	0.00	0.00	0.00	0.00
MSA 39460 Punta Gorda	0	0.00	98.32	0.00	0.00	0.00	0.00	0.00	0.00
MSA 42680 Sebastian-Vero Beach	0	0.00	94.82	0.00	0.00	0.00	0.00	0.00	0.00
MSA 45300 Tampa-St Petersburg-Clearwater	0	0.00	98.06	0.00	0.00	0.00	0.00	0.00	0.00

^{*} Based on 2012 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 26.67% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2010 TO OCTOBER 15, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield 2010	0	0	13	5,915	13	5,915	17.16	0	0
MD 33124 Miami- Miami Beach-Kendall 2010	0	0	20	4,536	20	4,536	13.16	0	0
MD 48424 West Palm Beach-Boca Raton- Boynton 2010	0	0	22	8,385	22	8,385	24.33	0	0
MSA 15980 Cape Coral-Ft Myers 2010	0	0	25	1,056	25	1,056	3.06	0	0
MSA 34940 Naples- Marco Island 2010	0	0	40	945	40	945	2.74	0	0

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

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

Table 14. Qualified Investments (continued)

QUALIFIED INVESTMENTS		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2010 TO OCTOBER 15, 2013			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Limited Review:									
Hendry County FL 051 for Census 2010	0	0	15	18	15	18	0.05	0	0
MSA 19660 Deltona-Daytona Beach-Ormond Beach 2010	0	0	1	1	1	1	0.00	0	0
MSA 35840 North Port-Bradenton-Sarasota 2010	0	0	7	28	7	28	0.08	0	0
MSA 36740 Orlando-Kissimmee-Sanford 2010	0	0	13	12,623	13	12,623	36.63	0	0
MSA 37340 Palm Bay-Melbourne-Titusville 2010	0	0	1	626	1	626	1.82	0	0
MSA 38940 Port St Lucie 2010	0	0	6	8	6	8	0.02	0	0
MSA 39460 Punta Gorda 2010	0	0	22	255	22	255	0.74	0	0
MSA 42680 Sebastian-Vero Beach 2010	0	0	3	65	3	65	0.19	0	0
MSA 45300 Tampa-St Petersburg-Clearwater 2010	0	0	3	1	3	1	0.00	0	0
Statewide	0	0	4	5	4	5	0.00	0	0
Outside AA	0	0	3	25	3	25	0.07	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: FLORIDA Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2013																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
MD 22744 Ft Lauderdale-Pompano Beach-Deerfield Beach	2.74	2	4.76	0.00	50.00	0.00	50.00	0	0	0	0	0	0	4.13	28.90	35.76	31.21
MD 33124 Miami-Miami Beach-Kendall	23.78	4	9.52	0.00	25.00	25.00	50.00	0	1	0	0	- 1	0	5.06	26.89	34.46	33.01
MD 48424 West Palm Beach-Boca Raton-Boynton	15.32	4	9.52	0.00	0.00	50.00	50.00	1	0	0	0	1	0	4.88	26.01	33.30	35.59
MSA 15980 Cape Coral-Ft Myers	12.52	5	11.90	0.00	20.00	80.00	0.00	1	1	0	0	0	0	3.49	19.26	52.98	24.27
MSA 34940 Naples-Marco Island	7.09	4	9.52	0.00	50.00	25.00	25.00	0	0	0	0	0	0	9.05	20.27	43.40	27.27

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: FLORIDA Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2013																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Limited Review:																	
Hendry County FL 051 for Census	2.65	1	2.38	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	38.11	61.89	0.00
MSA 19660 Deltona-Daytona Beach-Ormond Beach	4.12	4	9.52	0.00	25.00	75.00	0.00	0	1	0	- 1	0	0	3.15	20.14	52.85	23.86
MSA 35840 North Port-Bradenton-Sarasota	4.32	3	7.14	0.00	66.67	33.33	0.00	0	0	0	0	0	0	1.01	19.74	50.64	28.60
MSA 36740 Orlando-Kissimmee-Sanford	7.08	5	11.90	0.00	40.00	20.00	40.00	0	1	0	0	0	- 1	1.19	24.76	35.65	38.40
MSA 37340 Palm Bay-Melbourne-Titusville	3.94	2	4.76	0.00	0.00	50.00	50.00	0	0	0	0	0	0	2.39	20.42	47.51	29.68
MSA 38940 Port St Lucie	5.17	3	7.14	0.00	66.67	33.33	0.00	0	2	0	0	- 1	- 1	2.29	19.63	55.65	22.43
MSA 39460 Punta Gorda	8.61	3	7.14	0.00	0.00	100.00	0.00	0	2	0	0	- 2	0	0.00	7.06	76.70	16.23
MSA 42680 Sebastian-Vero Beach	1.16	1	2.38	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.30	14.60	59.37	23.73
MSA 45300 Tampa-St Petersburg-Clearwater	1.50	1	2.38	0.00	100.00	0.00	0.00	0	1	0	0	- 1	0	0.00	33.38	62.81	3.82