



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**The First National Bank of Florida
Charter Number: 18236**

**6512 Caroline Street
Milton, FL 32570**

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Birmingham Field Office
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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 **The First National Bank Of Florida (FNB FL)** with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- Given the bank’s performance context, lending levels reflect good responsiveness to the credit needs of the bank’s assessment area (AA).
- FNB FL’s distribution of loans among geographies and borrowers of different income levels is good throughout its AA.
- Investments reflect an adequate responsiveness to the needs of its AA considering the limited investment opportunities available.
- Accessibility of FNB FL’s offices to geographies and individuals of different income levels and the responsiveness of FNB FL’s services to the needs of its AA are satisfactory.
- FNB FL maintains adequate performance in providing community development services.

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

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

Description of Institution

First National Bank of Florida (FNB FL) was chartered in 1984 and is located in Milton, Florida. FNB FL is an intrastate bank with 8 branches located in Santa Rosa and Okaloosa Counties. FNB FL has not been involved in any merger or acquisition activities, has no operating subsidiaries and is not a subsidiary of a holding company.

As of December 31, 2002, FNB FL reported total assets of \$356 million, and a loan-to-deposit ratio of 62 percent. Tier 1 capital totaled \$32 million. Net loans are 48.48 percent of total assets. FNB FL provides both lending and deposit services. The bank provides a full range of commercial and consumer loans. FNB FL also offers mortgage loans, consumer loans, and small business loans. As of December 31, 2002, FNB FL's loan mix was reported as 86 percent commercial real estate, 13 percent residential 1 to 4 family, and 1 percent loans to individuals. The majority of residential mortgage products offered are sold in the secondary market to investors. There are no significant financial barriers limiting FNB FL's ability to help meet the identified credit needs of its AAs.

FNB FL's business strategy is to provide its customers with a full range of products and services consistent with a community bank. The bank's lending focus is to continue originating loans to small businesses. Community contacts indicated that affordable housing and small business loans are the primary credit needs in the AA.

FNB FL has two stated assessment areas (AAs). The Pensacola AA is comprised of the entire Pensacola MA which includes, 67 tracts in census tracts in Escambia and Santa Rosa Counties. The Ft. Walton AA include one census tract from the Ft. Walton MA, which contains FNB FL's only branch in the MA. As of June 30, 2002, the Federal Deposit Insurance Corporation (FDIC) reported that FNB FL maintains 7.95 percent of the commercial bank deposits in the Pensacola AA. The bank considers their top five competitors to be AmSouth, SouthTrust, Regions, Bank of America and Whitney National Bank. For additional information on the AA, please refer to Appendix B: *Market Profiles for Areas Receiving Full-Scope Reviews*.

A CRA Performance Evaluation dated August 31, 1998, was previously prepared for FNB FL and a "Satisfactory" performance rating was assigned. A review of OCC records, as well as the bank's CRA Public File, did not reveal any complaints relating to the bank's CRA performance.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. Residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA) and small business and small farm loans were reviewed to evaluate the bank's lending performance. With the exception of community development (CD) loans, the evaluation period for the Lending Test was January 1, 1999 through December 31, 2002. For CD loans and the Investment and Service Tests, the evaluation period was August 31, 1998 through September 29, 2003. The Investment Test included a review of investments, grants, and donations made in the bank's AAs that meet the definition of CD investments. The Service Test included a review of retail and CD services provided in the bank's AAs.

Data Integrity

As part of the CRA evaluation, the accuracy of FNB FL's small business and HMDA loan data was tested. A total of 201 HMDA loans and 241 small business loans were sampled. With the exception of the 1999 HMDA sampled loans, the review found the data to be reliable. The 1999 HMDA sample resulted in an error rate of 11.67 percent. Most of the errors were incorrect census tract (CT) coding. Bank management performed a 100 percent review of the 1999 HMDA loans to ensure proper coding of CTs.

Community development loans, investments, and services submitted by management were verified to ensure that they met the regulatory definition. The bank did not publicly report any CD loans. However, the bank did generate one CD loan during the evaluation period and it was considered in this review.

Selection of Areas for Full-Scope Review

FNB FL has designated two AAs. The Pensacola AA was selected for the full-scope review because this area is where the bank maintains a substantial share of its business; 93% of deposits and 90% of reportable loans in the evaluation period. Additionally, the Pensacola AA is where 88% of the branches are located and FNB FL has long history of serving this market. A limited-scope review was conducted in the Ft. Walton AA.

Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews. Small business lending was given more weight in the overall conclusions than home mortgage products, since the bank's primary focus is small business lending. During the evaluation period, the bank only reported 14 small farm loans totaling \$802 thousand.

Other

Two community contacts were conducted during the examination. One contact was made with a nonprofit organization that provides affordable housing and another contact was made with a local Community Development Corporation (CDC) that provides affordable housing, small

business loans, and technical assistance. Both contacts indicated that affordable housing and small business loans are primary credit needs. The Executive Director of the CDC stated funding from local banks come in the form of direct loans to his organization. These loans qualify as CD loans but do not qualify as CD investments. He stated that he was unaware of any other CDC's in the Florida panhandle and that opportunities for CD investments in the Pensacola MSA are limited. The comments received from both contacts were generally positive concerning the manner in which local financial institutions provided needed credit, investments, and services to the community.

Fair Lending Review

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

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "High Satisfactory". Based on a full scope review of the Pensacola MSA, the bank's lending performance in the AA is good.

Lending Activity

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

Overall lending activity reflects a good responsiveness to the credit needs within FNB FL's AA. The bank's loan-to-deposit ratio on December 31, 2002 was 62 percent. FNB FL's primary lending strategy is to focus on small business lending. Therefore, this analysis emphasized loans to small businesses in assessing the bank's lending performance. Home purchase and refinance loans retained by the bank are extended primarily on an accommodation basis or are nonconforming to secondary market underwriting guidelines. The bank has addressed the home purchase and refinance needs of the community through underwriting loans for sale in the secondary market. Several products are offered, including some with flexible terms targeting low- and moderate-income applicants. At less than one percent of the bank's total loans, the volume of small farm originations is not material. It is not a primary business line of the bank and therefore an assessment on the performance of small farm lending is not made in this performance evaluation.

FNB FL's volume of small business loans was good. For the years 1999, 2000, 2001, and 2002, FNB originated 739 small business loans totaling \$87 million. Seventy-three percent of the number and 69 percent of the dollar volume of small business loans were originated within the bank's AA. Based on 2001 aggregate small business data, FNB FL ranks 4th in small business loans with 2.53 percent market share when excluding non-bank competitors.

The bank has originated an adequate volume of home mortgage loans. For years 1999, 2000, 2001, and 2002, FNB originated 182 home mortgage loans totaling \$13 million. Seventy-six percent of the number and 46 percent of the dollar volume of home mortgage loans were originated within the bank's AA. Mortgage loan originations were distributed as follows: 58 percent for home purchase, 20 percent for home improvement, and 22 percent for home refinance. At 7.95 percent, FNB FL ranks 6th in deposit market share in the Pensacola MSA. Due to the numerous competitors, (approximately 450, many of which are non-bank competitors) in the Pensacola MSA for home purchase/refinance loans, FNB FL ranks well below market leaders for home purchase loans. However, FNB ranks 23rd in home improvement loans with 0.76 percent of the market share. FNB FL meets most of its customer's home purchase and refinance needs through processing loans to be sold to secondary market investors. From January 2000 through year-end 2002, FNB FL processed

upwards of 677 home purchase loans totaling over \$91 million, which have been sold to secondary market investors.

Distribution of Loans by Income Level of the Geography

The overall distribution of loans by income level of geographies is good.

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.

Home Purchase Loans

The bank's geographic distribution of home purchase loans is good. Most weight is given to performance in the moderate-income CTs given the level of opportunities for lending. The volume of loans required to meet the demographic in low-income CTs is low and does not provide a significant basis for comparison. Opportunities to make home mortgage loans in low-income CTs are limited as the percentage of owner occupied units is only 3.05 percent.

The bank's performance is lower than the percent of owner occupied housing units in the low-income CTs. The bank's performance exceeds the percent of owner occupied housing units in the moderate-income CTs. This performance is particularly good when noting that 20 percent of the households in the moderate-income CTs live below the poverty level of \$11,325. The bank's market share in low- and moderate-income tracts exceeds its overall market share in the AA.

Home Improvement Loans

The bank's geographic distribution of home improvement loans is good, with most weight given to performance in the moderate-income tracts. The bank has not made any home improvement loans in low-income CTs. The bank's performance exceeds the percent of owner occupied housing units in the moderate-income CTs. The bank's market share in moderate-income tracts exceeds its overall market share in the AA.

Home Refinance Loans

The bank's geographic distribution of home refinance loans is excellent. The bank's loans in low- and moderate-income CTs exceed the percent of owner occupied housing units in both the low- and moderate-income tracts. The bank's market share in low- and moderate-income tracts exceed its overall market share in the AA.

Multi-Family Loans

An evaluation of the geographic distribution of multi-family loans in the AA is not meaningful due to the very small number of loan originations of this type.

Small Loans to Businesses

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

FNB FL’s geographic distribution of small business loans in the AA is good. The percentage of bank loans to small businesses is lower than the percent of small businesses in low-income CTs. The percentage of bank loans to small businesses exceeds the percent of small businesses in moderate-income CTs. While the bank’s market share in low-income tracts is lower that the overall market share in the AA,the market share in moderate- income tracts exceeds its overall market share.

Small Loans to Farms [Not applicable]

Refer to Table 7 in appendix C for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to farms. An evaluation of the geographic distribution of small loans to farms in the AA is not meaningful due to the very small number of originations of this type.

Lending Gap Analysis

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

Inside/Outside Ratio

This analysis was performed at the bank level. A majority of FNB FL’s home mortgage loans, small loans to businesses were originated within its AA. By product, the bank originated the following percentage of loans inside its AA.

Loan Type	% Inside
Home Purchase	80%
Refinance	93%
Home Improvement	95%
Multifamily	27%
Small Loans to Businesses	82%
Small Loans to Farms	61%
Overall	82%

This performed was positively factored in the overall analysis of the geographic distribution of lending.

Distribution of Loans by Income Level of the Borrower

FNB FL’s overall distribution of loans by income level of the borrowers is good.

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.

Home Purchase Loans

The bank's distribution of home purchase loans is good. The percentage of home purchase loans to low-income borrowers is significantly lower than the percentage of low-income families. This is somewhat mitigated by performance context issues. Roughly 15 percent of the households in this AA earn less than the poverty level. It is difficult for households below the poverty level to qualify for home purchase loans. The percentage of home purchase loans to moderate-income borrowers is near to the percentage of moderate-income families in the AA. The bank's market share of home purchase loans to both low- and moderate-income borrowers exceeds that of its overall market share.

Home Improvement Loans

The bank's distribution of home improvement loans is excellent. The percentage of home purchase loans to low-income borrowers is near to the percentage of low-income families. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. While the bank's market share in moderate-income tracts is lower than the overall market share in the AA, the market share in low-income tracts exceeds its overall market share.

Home Refinance Loans

The bank's distribution of home refinance loans is good. The percentage of home refinance loans to low-income borrowers is lower than the percentage of low-income families. The percentage of home refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. While the bank's market share in low-income tracts is lower than the overall market share in the AA, the market share in moderate-income tracts exceeds its 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/purchase of small loans to businesses.

The bank's loans to small businesses in the AA are good. The percentage of bank loans to businesses with revenues less than \$1 million exceeds the percentage of businesses with revenues of less than \$1 million. The bank's market share to businesses with revenues less \$1 million exceeds its overall market share.

Small Loans to Farms [Not applicable]

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

Community Development Lending

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

Community development lending had a neutral affect on the Lending Test conclusions in FNB FL's AA.

FNB FL originated one CD loan in their AA during the evaluation period. This CD loan was made to a nonprofit organization that addresses affordable housing, which has been identified as a critical need within the AA. The loan originated on February 11, 2000 for \$25 thousand to construct and provide permanent financing of a single-family residential property.

Product Innovation and Flexibility

FNB FL offers a full range of consumer and commercial loan products, but currently does not offer any in-house products that would be considered an innovative or flexible lending product to address the credit needs of low- or moderate-income individuals or geographies. However, the bank has processed 8 loans totaling \$559 thousand under the USDA Rural Housing Service program. These loans are sold to secondary market investors. This program offers applicants flexible terms, such as no down payments, no mortgage insurance, and low closing costs to enable low- and moderate-income families to qualify for a home mortgage loans.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Ft. Walton AA is not inconsistent with the bank's overall "High Satisfactory" rating performance under the Lending Test. Refer to Tables 1 through 12 in appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Pensacola MA is adequate.

Refer to Table 13 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Qualified investments are investments, deposits, membership shares, or grants that have as their primary purpose "Community Development" as defined in the CRA regulation.

All of the bank's investments are centered in donations and grants to entities involved in community development activities. FNB FL made 62 qualified investments totaling approximately \$8 thousand during the evaluation period. Total qualified investment levels are considered only adequate compared to the resources of the bank and are not innovative. Community contacts state that investment opportunities are very limited in the AA.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Ft. Walton AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test. Refer to Table 13 in appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Low Satisfactory". Based on full-scope reviews, the bank's performance in the Pensacola MA is adequate.

Retail Banking Services

Refer to Table 14 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.

The quantity, quality and accessibility of FNB FL's retail banking system are satisfactory. FNB FL operates 8 branch offices in the Pensacola MA. Delivery systems are reasonably accessible to essentially all geographies and are equitably distributed between moderate and middle-income geographies. Moderate-income branches constitute 14.29% of the branches, which exceeds the 12% of the population living in moderate-income CTs. Other branches are located contiguous to the Enterprise Zone and serve the area. All eight ATMs are located onsite with the branches.

Since the previous CRA evaluation, the bank has added three deposit only branches, which are located in Wal-Mart stores in the Pace and Pensacola areas. No bank branches have been closed in the Pensacola MA since the previous evaluation. Branch openings have not had an adverse impact on low- and moderate-income geographies or individuals.

FNB FL provides a wide range of services at each of its 7 offices. Five of the branches offer full-services and three offer deposit only services, but provide loan applications for customer completion. The stand-alone branches provide drive-through banking and safe deposit box services. Services provided at the various branches are not dependent upon the income-geography of the branch, and do not vary in any way that would inconvenience portions of the AAs. FNB FL also provides alternative delivery systems with telephone and internet banking. These systems provide easy access to bank services by all sections of the bank's AA, as well as to low- and moderate-income individuals and geographies.

Community Development Services

FNB FL has demonstrated limited community development service performance in the AA that received a full scope review. Activities demonstrate a willingness to assist its communities through technical assistance and economic development.

Below are examples of the bank's involvement in community development services:

- **TEAM Santa Rosa Economic Development Council** - The economic council targets downtown Milton, Florida and the surrounding Enterprise Zone and promotes small business development through low-interest loans, grants, and tax credits. Milton, Florida is located in a moderate-income tract. The Enterprise Zone surrounding Milton includes economically challenged areas with little business growth. The council is a nonprofit organization. A senior vice president of the bank has served on the council's Board during the evaluation period.
- **Junior Achievement** - Junior Achievement targets high school students from Santa Rosa County and educates them about the banking industry and financial information in general. Two students are selected from each high school in the county, including high schools from moderate tracts, and appointed to the Junior Achievement Board. The students are educated on topics of the banking industry, such as banking services, compliance and audit, loans and credit, accounting, and more. Two bank officers have been assigned to this service project during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Ft. Walton AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the Service Test. Refer to Table 14 in appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

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

Time Period Reviewed	Lending Test (excludes CD Loans): 1/1/99 to 12/31/02 Investment and Service Tests and CD Loans: 8/31/98 to 9/29/03	
Financial Institution	Products Reviewed	
First National Bank of Florida (FNB FL) Milton, Florida	Small loans to businesses, home mortgage loans and CD loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Pensacola MSA Partial Ft. Walton AA	Full Scope Limited Scope	Santa Rosa and Escambia Counties Includes on CT in Okaloosa County

Appendix B: Market Profiles for Full-Scope Areas

Pensacola MSA

Demographic Information for Full-Scope Area: Pensacola MSA							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts/BNAs)	67	8.96	17.91	50.75	14.93	7.46	
Population by Geography	344,406	4.08	12.26	62.68	20.74	0.24	
Owner-Occupied Housing by Geography	86,356	3.05	10.54	63.69	22.72	0.00	
Businesses by Geography	25,731	7.22	11.76	58.79	19.76	2.48	
Farms by Geography	762	2.10	7.48	72.18	17.98	0.26	
Family Distribution by Income Level	94,100	20.52	18.10	21.88	39.49	0.00	
Distribution of Low- and Moderate-Income Families throughout AA Geographies	36,348	6.98	17.93	62.89	12.20	0.00	
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below the Poverty Level	= \$29,922 = \$45,300 =15.51%	Median Housing Value Unemployment Rate				= 61,345 = 3.1%	

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

FNB FL has defined the Pensacola MSA as the primary AA. The MSA includes all tracts in Santa Rosa County and Escambia County. The AA does not arbitrarily exclude any low- and moderate-income tracts. There are 6 low, 12 moderate, 34 middle, and 10 upper-income tracts in the AA. The AA also includes 5 non-applicable tracts that do not provide any demographic information.

As of the 1990 census, the total population of the AA was 344,406 with 94,100 families and 128,776 households. The population is distributed at 4.8 percent, 12.3 percent, 62.7 percent, and 20.7 in low, moderate, middle, and upper-income tracts, respectively. The low- and moderate-income tracts are concentrated in the downtown Pensacola district.

Of the 94,100 families in the AA, 20.5 percent, 18.1 percent, 21.9 percent, and 39.5 percent report earning low, moderate, middle, and upper-incomes, respectively. Approximately 32 percent of the households in the AA receive public assistance or social security and 15 percent live below the poverty level. Approximately 88 percent of housing units are occupied and 59 percent are owner occupied.

FNB FL operates 4 full service branches, 3 deposit only branches, and 7 automated teller machines (ATM's) in the Pensacola MSA. The main branch is located in a moderate-income tract. One ATM is located in a moderate-income tract onsite with the main branch. Local

competition is strong and is provided by branches of large regional banks and financial institutions, such as Regions, SouthTrust, Bank of America, Amsouth, Whitney Bank, and SunTrust. Locally owned banks include Bank of Pensacola (\$750 million), now a subsidiary of Synovus Financial Corporation, and Citizens and Peoples Bank, NA (\$93 million), owned by Alabama National BanCorporation.

The economic conditions in the Pensacola MSA are stable, given the large military and civilian government presence. However, the job market is still struggling with an acceleration of recent job losses in manufacturing, information technology, and retail trade. The housing demand has increased and is currently above 1 percent due to Pensacola's low cost of living, affordable housing, and low interest rates. The cost of housing and transportation in the Pensacola MSA is substantially below the national mean. Pensacola attracts retirees due to the climate and the affordable lifestyle.

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: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

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

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 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. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

Table 14. 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: MILTON, FLORIDA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	% 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:												
Pensacola MSA	89.54	182	12,880	739	86,552	12	626	1	25	934	100,083	
Limited Review:												
Ft. Walton partial MSA	10.46	17	2,465	90	11,640	2	176	0	0	109	14,281	

* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is [Date of Last CRA Evaluation] to [Start Date of CRA Data Analysis Phase].

*** Deposit Data as of June 30, 2002. 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		Geography: MILTON, FLORIDA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/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:															
Pensacola MSA	103	89.57	3.05	0.97	10.54	11.65	63.69	77.67	22.72	9.71	0.07	0.00	0.00	0.07	0.11
Limited Review:															
Ft. Walton partial MSA	12	10.43	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.07	0.00	0.00	0.07	0.00

* Based on 2001 Peer Mortgage Data: Southeast Region.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: MILTON, FLORIDA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans	% Owner Occ***	% BANK Loans						
Full Review:																
Pensacola MSA	36	92.31	3.05	0.00	10.54	16.67	63.69	80.56	22.72	2.78	0.54	0.00	1.16	0.53	0.40	
Limited Review:																
Ft. Walton	3	7.69	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2001 Peer Mortgage Data: Southeast Region.

** 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: MILTON, FLORIDA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/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	Over all	Low	Mod	Mid	Upp						
Full Review:																					
Pensacola MSA	40	95.24	3.05	7.50	10.54	15.00	63.69	75.00	22.72	2.50	0.04	0.00	0.15	0.04	0.00						
Limited Review:																					
Ft. Walton partial MSA	2	4.76	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.09	0.00	0.00	0.09	0.00						

* Based on 2001 Peer Mortgage Data: Southeast Region.

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

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: MILTON, FLORIDA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
Pensacola MSA	3	100.00	5.99	0.00	6.97	33.33	43.43	33.33	43.61	33.33	10.00	0.00	0.00	0.00	25.00
Limited Review:															
Ft. Walton partial MSA	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Mortgage Data: Southeast Region.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: MILTON, FLORIDA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
MA/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 Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Pensacola MSA	739	89.14	7.22	2.86	11.76	16.51	58.79	71.49	19.76	9.14	2.53	0.81	3.74	3.36	1.06
Limited Review:															
Ft. Walton partial MSA	90	10.86	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.96	0.00	0.16	1.26	0.43

* Based on 2001 Peer Small Business Data: US.

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

*** Source Data - Dun and Bradstreet (2002).

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: MILTON, FLORIDA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/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:															
Pensacola MSA	12	85.71	2.10	0.00	7.48	16.67	72.18	83.33	17.98	0.00	47.37	0.00	100.00	46.67	0.00
Limited Review:															
Ft. Walton partial MSA	2	14.29	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2001 Peer Small Business Data: US.

** 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 (2002).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: MILTON, FLORIDA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/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 ^{**}	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families ^{**}	% BANK Loans ^{****}	Over all	Low	Mod	Mid	Upp
Full Review:															
Pensacola MSA	103	89.57	20.52	3.09	18.10	17.53	21.88	17.53	39.49	61.86	0.08	0.25	0.10	0.08	0.05
Limited Review:															
Ft. Walton partial MSA	12	10.43	12.07	0.00	18.29	0.00	20.65	0.00	48.99	100.00	0.08	0.00	0.00	0.00	0.10

[†] Based on 2001 Peer Mortgage Data: Southeast Region.

^{**} As a percentage of loans with borrower income information available. No information was available for 6.96% of loans originated and purchased by Bank.

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

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

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT			Geography: MILTON, FLORIDA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002								
MA/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 [*]	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	% Families [*]	% BANK Loans ^{****}	Over all	Low	Mod	Mid	Upp
Full Review:															
Pensacola MSA	36	92.31	20.52	18.75	18.10	21.88	21.88	28.13	39.49	31.25	0.49	0.96	0.00	0.76	0.40
Limited Review:															
Ft. Walton partial MSA	3	7.69	12.07	0.00	18.29	0.00	20.65	66.67	48.99	33.33	0.00	0.00	0.00	0.00	0.00

[†] Based on 2001 Peer Mortgage Data: Southeast Region.

^{**} As a percentage of loans with borrower income information available. No information was available for 10.26% of loans originated and purchased by Bank.

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

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

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MILTON, FLORIDA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002							
MA/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 [*] **	% BANK Loans ^{****}	% Families [*] **	% BANK Loans ^{****}	% Families [*] **	% BANK Loans ^{****}	Over all	Low	Mod	Mid	Upp
Full Review:															
Pensacola MSA	40	95.24	20.52	2.56	18.10	25.64	21.88	17.95	39.49	53.85	0.05	0.00	0.07	0.05	0.05
Limited Review:															
Ft. Walton partial MSA	2	4.76	12.07	0.00	18.29	0.00	20.65	0.00	48.99	100.00	0.11	0.00	0.00	0.00	0.14

^{*} Based on 2001 Peer Mortgage Data: Southeast Region.

^{**} As a percentage of loans with borrower income information available. No information was available for *[Percentage]* of loans originated and purchased by Bank.

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

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

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: MILTON, FLORIDA		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Pensacola MSA	739	89.14	70.20	71.18	68.20	20.16	11.64	2.53	3.64
Limited Review:									
Ft. Walton partial MSA	90	10.86	60.61	85.56	66.67	20.00	13.33	0.96	1.34

* Based on 2001 Peer Small Business Data: US.

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002).

**** 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 12.67% 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		Geography: MILTON, FLORIDA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/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****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev \$1 Million or Less
Full Review:									
Pensacola MSA	12	85.71	95.28	50.00	91.67	8.33	0.00	47.37	45.45
Limited Review:									
Ft. Walton partial MSA	2	14.29	96.77	100.00	50.00	50.00	0.00	0.00	0.00

* Based on [Year] Peer Small Business Data: US.

** 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 - 2002).

**** 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 42.86% of small loans to farms originated and purchased by Bank.

Table 13. Qualified Investments

QUALIFIED INVESTMENTS		Geography: MILTON, FLORIDA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Pensacola MSA	0	0.00	1	25	1	25	100.00	0	0.00
Limited Review:									
Ft. Walton partial MSA	0	0.00	0	0.00	0	0.00	0.00	0	0.00

Evaluation Period should read August 31, 1998 (date of last PE) to start date of this examination.

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

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

Table 14. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: MILTON, FLORIDA Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002																		
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:																		
Pensacola MSA		7	87.50	0.00	14.29	85.71	0.00	3	0	0	0	+3	0	4.08	12.26	62.68	20.74	
Limited Review:																		
Ft. Walton partial MSA		1	12.50	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00	

Evaluation Period should read August 31, 1998 (date of last PE) to start date of this examination.

Also missing next 3 tales which include (1) distribution of branch and ATM delivery system (not sure if you have to have it all ATMS are located at branch locations), (2) market profile table for Pensacola AA, and (3) market profile table for Ft. Walton AA.