



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Seacoast National Bank
Charter Number 14838

815 Colorado Avenue
Stuart, FL 34995-9012

Office of the Comptroller of the Currency

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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 Outstanding.

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

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory		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:

- Lending levels that reflect good responsiveness to meeting the credit needs of the Bank’s assessment areas, given performance context.
- An adequate geographic distribution of loans, given performance context and considering the significant level of lending inside the Bank’s assessment area.
- A good distribution of loans by the income level of the borrower, given performance context.
- An excellent level of community development loans that are responsive to community credit needs given the Bank’s capacity and the opportunities in its assessment area. The level of community loans had a positive impact on the overall Lending Test conclusion.
- A good level of flexible lending products that had a positive impact on the outcome of the Lending Test.
- A good level of qualified investments considering excellent performance in three limited-scope assessment areas, performance context, and available opportunities.
- Retail delivery systems readily accessible to low- and moderate-income geographies.
- An excellent level of community development services, with the Bank sometimes taking a leadership role.

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

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

Description of Institution

Seacoast National Bank (SNB) is a publicly traded intrastate community Bank headquartered in Stuart, Florida. SNB is a wholly owned subsidiary of Seacoast Banking Corporation of Florida, a one-Bank holding company also headquartered in Stuart. The holding company assets totaled \$2.1 billion. The Bank has six subsidiaries, four operating subsidiaries, and two statutory subsidiaries. The operating subsidiaries include South Branch Building, Inc, which owns one of the Bank's branch locations. TCoast Holdings, LLC, BR West, LLC, and TC Property Venture, LLC, which owns and operates certain properties acquired through foreclosure. The statutory subsidiaries include FNB Insurance Services, Inc., which has never had any activity and TC Stuart, LLC, which was formed to hold foreclosed real estate but currently has no activity or assets. The operation of these subsidiaries does not affect the Bank's ability to lend or invest in its community. FNB Brokerage Services, Inc., which provided brokerage and annuity services was dissolved December 31, 2011. Brokerage services are now offered through a third party.

As of June 30, 2012, SNB reported total assets of \$2.1 billion and total deposits of \$1.7 billion. Tier 1 Capital totaled \$199.3 million. While the Bank offers a full range of loan products, as outlined in its CRA Public File, the Bank's primary business focus is real estate lending, particularly residential real estate. The loan portfolio, which totaled \$1.2 billion, represented 57 percent of total assets. The loan portfolio consists of residential mortgage loans (48 percent), commercial real estate loans (43 percent), commercial loans (5 percent), and consumer loans (4 percent). The Bank regularly sells the residential real estate loans it originates on the secondary market. SNB does not purchase Home Mortgage Disclosure Act (HMDA) or small loans to businesses. The Bank had a net loss of \$435 thousand.

During the evaluation period, SNB operated 40 branch offices in 14 counties in Central and South Florida. In December 2009, SNB closed its one and only office in Broward County leaving 39 branches in 13 counties. There are 24 branches on the "Treasure Coast" which includes Martin, St. Lucie, and Indian River Counties, the Bank's primary market area. Branches are also located in Brevard, Desoto, Glades, Hardee, Hendry, Highlands, Okeechobee, Orange, Palm Beach, and Seminole Counties.

There are no legal, financial, or other factors impeding SNB's ability to help meet the credit needs in its assessment areas. However, the Bank is operating under a Formal Agreement with the Office of the Comptroller of the Currency that focuses on the reduction of credit risk, problem assets, and the management of real estate concentrations that has limited the volume of real estate lending activity. At its last CRA examination dated August 31, 2009 the Bank was rated "Outstanding".

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses the Bank's performance under the Lending, Investment, and Service Tests. In evaluating the Bank's lending performance, we reviewed residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA), small loans to businesses as reported under the CRA, and community development loans. Small loans to farms and multi-family housing loans reported under the HMDA were not analyzed as their number was not material and an analysis would not be meaningful.

With the exception of community development loans, the evaluation period for the Lending Test is July 1, 2009 through December 31, 2011. For community development loans, the Investment Test, and the Service Test, the evaluation period is August 31, 2009, the date of the last CRA evaluation, through August 31, 2012.

Data Integrity

This evaluation is based on accurate data. We relied upon management's internal reviews and our sampling as to the accuracy of the HMDA data and small loans to businesses reported under the CRA. We found an isolated error in the small loans to business sample and management corrected the error. We used the corrected data at this examination.

Community development loans, investments, and services submitted by management were verified to ensure that they met the regulatory definition of community development. Items submitted met the definition of community development.

Selection of Areas for Full-Scope Review

The Bank currently has seven assessment areas in Florida. The Metropolitan Statistical Area (MSA) 38940 (Port St. Lucie-Ft. Pierce, FL) which consists of Martin and St. Lucie Counties and MSA 42680 (Sebastian-Vero Beach, FL) which consists of all of Indian River County received full-scope reviews. The full-scope MSAs represent 72 percent of the deposits as of June 30, 2011, and 71 percent of the total number of loans analyzed at this examination. Refer to Appendix A for additional information regarding the assessment area receiving a full-scope review.

The remaining five assessment areas received limited-scope reviews and include the following:

- Metropolitan Division (MD) 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL) - Broward County
- MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) - Palm Beach County
- MSA 36740 (Orlando-Kissimmee, FL) – only Orange and Seminole Counties
- MSA 37340 (Palm Bay-Melbourne-Titusville, FL)- Brevard County
- Non-MSA Counties of Desoto, Glades, Hardee, Hendry, Highlands, and Okeechobee

Information on Broward County was not included in the analysis due to the closure of the one and only branch office early in the evaluation period, but the information remains in the tables. Refer to Appendix A for additional information regarding full- and limited-scope reviews.

Ratings

The Bank's overall rating is based primarily on those areas that received full-scope reviews. The most weight was given to performance in the MSA 38940 (Port St. Lucie-Fort Pierce, FL) assessment area, because it alone represents 60 percent of the Bank's deposits as of June 30, 2011 and 52 percent of loans reported for this examination. MSA 42680 assessment area represents 12 percent of deposits and 19 percent of loans reported for this examination.

Based on loan volumes, HMDA loan performance was more heavily weighted than performance related to small loans to businesses. Of the two, HMDA loans represent 85 percent of loans analyzed at this examination. Within HMDA loans, home purchase loans received the most weight because they represent 70 percent of all HMDA loans analyzed. Home improvement and refinance loans were given equal weight.

Due to the limited number of low- and moderate -income geographies (3 and 17 respectively) in the full-scope assessment areas, more weight was given to the distribution of loans by income level of the borrower segment of the Lending Test than distribution of loans by income level of the geography.

Other

Community credit needs in the assessment area were determined by reviewing recent housing and demographic information, the plan for the Fort Pierce Enterprise Zone, the various Community Redevelopment Areas (CRA) within MSA 38940, the Martin and St. Lucie County plans for HUD's Neighborhood Stabilization Plan (NSP) funds, and the plans for the Indian River/City of Vero Beach Enterprise Zone. In addition, for this examination we conducted two community contacts, one in each full-scope assessment area. Both contacts were with local non-profit affordable housing organizations.

Presently, the most critical needs identified were those associated with providing affordable housing, job opportunities, and community services directed to the unemployed and homeless. The latter two needs are directly associated with the current state of the local economies in the assessment areas. The NSP plans documented the need to stabilize areas by addressing the foreclosure problems prevalent in both assessment areas by rehabilitating foreclosed homes and selling them to eligible homebuyers. One community contact indicated that obtaining NSP funds for low- and moderate-income people is difficult because the home must be rehabilitated prior to homebuyer closing on the loan, even though the county buys the loan to 80 percent loan-to-value for the homebuyer and provides up to \$4,000 in down payment assistance. The contact felt that more flexibility in this program would offer more opportunities for lenders to address affordable housing needs. One contact also felt that more opportunities could be created, if financial institutions would rely more on alternative or untraditional underwriting and less on credit scores. Another need or opportunity noted was for financial institutions to participate with organizations that promote affordable housing initiatives.

For additional information, see the Market Profile in Appendix B.

Fair Lending or Other Illegal Credit Practices Review

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 "Outstanding", when considering the Bank's community development loan performance. Based on a full-scope review, the Bank's performance in the Port St. Lucie-Ft. Pierce MSA full-scope assessment area is excellent, when considering the Bank's strong community development loan performance. Based on a full-scope review, the Bank's performance in the Sebastian-Vero Beach MSA full-scope assessment area is good, when considering the Bank's lending to borrowers of different income levels and businesses of different sizes.

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, SNB's lending activity reflects good responsiveness to credit needs in its assessment area, given performance context. Lending activity reflects good responsiveness to the credit needs in both the full-scope Port St. Lucie-Ft. Pierce area and full-scope Sebastian-Vero Beach MSA assessment area, given performance context.

In addition to the responsiveness provided by the level of the Bank's HMDA loans and small loans to businesses discussed below, the Bank responded to pressing needs in its assessment areas by initiating a loan modification program to prevent foreclosure with the objective of providing affordable, sustainable, loan modifications for homeowners who are facing foreclosure on their primary residence. During the evaluation period, SNB originated 59 loans to low- and moderate-income borrowers. Thirteen loans were originated in the full-scope Port St. Lucie-Ft. Pierce MSA and four were originated in the Sebastian-Vero Beach MSA. Loan modifications are not reportable under the HMDA and are, therefore, not included in the analysis that follows.

MSA 38940 (Port St. Lucie-Ft. Pierce, FL)/Martin and St. Lucie Counties

Lending activity reflects good responsiveness to the credit needs in the full-scope Port St. Lucie-Ft. Pierce assessment area, given performance context. Both HMDA and small loans to businesses activity reflects good responsiveness to the credit needs in the full-scope Port St. Lucie-Ft. Pierce assessment area, given performance context.

Home mortgage lending activity is good, when the Bank's deposit market share and rank is compared with its HMDA loan market share and rank when considering performance context. The Bank's market share and rank of HMDA loan originations and purchases in the Port St. Lucie-Ft. Pierce assessment area was significantly lower than its deposit market share and rank. However, the Bank's performance was negatively impacted by multiple performance context factors. These include the fact that SNB does not purchase HMDA loans, the large number of non-deposit taking HMDA lenders in the assessment area with many of them offering a far greater variety of mortgage products than SNB, and local economic conditions that have caused a marked decline in home purchases and refinances. Combined,

these factors make it very difficult for the Bank to have comparable deposit and HMDA loan performance and, considering these factors, the Bank's performance is good.

For further discussion on performance context issues, please see the Market Profile in Appendix B.

SNB's deposit market share in the Port St. Lucie-Ft. Pierce MSA assessment area was 15.30 percent and the Bank ranked first, according to FDIC data as of June 30, 2011. The Bank's market share of all HMDA loan originations and purchases was 4.70 percent and it ranked fourth of 379 lenders reporting HMDA loans in the assessment area, based on 2011 aggregate data. Leading lenders include Wells Fargo Bank, NA, J.P. Morgan Chase, NA, and Bank of America with market shares of 17.76 percent, 9.35 per cent, and 8.51 percent, respectively. SNB was ranked fourth for home purchase loans, second for home improvement loans, and ninth for refinance loans.

Competition for mortgage loans is very strong in the assessment area. As noted above, there are a very large number of lenders reporting loan originations and purchases under the HMDA, many of them among the largest mortgage lenders in the United States. Most are mortgage companies and financial institutions that do not take deposits in the assessment area. In 2011, there were 23 financial institutions reporting deposits in the Port St. Lucie-Ft. Pierce assessment area and 379 lenders reporting HMDA activity.

Given performance context, economic conditions during the evaluation period, the residential lending focus of the Bank, and the high level of competition in the Port St. Lucie-Ft. Pierce AA, small business lending activity is good. The Bank's market share of such loans is significantly lower than its deposit market share, and its rank is somewhat lower than its deposit share rank. FDIC data as of June 30, 2011, shows that SNB had a deposit market share of 15.30 percent and it was ranked first among 23 financial institutions reporting deposits in the assessment area. Based on 2011 aggregate data, the Bank's market share of loans to small businesses is 7.45 percent (based on dollar volume) and the Bank is ranked twelfth of 68 lenders reporting such loans in the AA. Market share and rank are based on the dollar volume of loans rather than number of loans because of the inclusion of credit card lenders in small loans to businesses reporting. Credit card lenders originate a large number of small loans to businesses, but the dollar volume is significantly smaller. For example, the top five reporters of small loans to businesses are all credit card lenders that combined have a market share of 70 percent based on number of loans but only 31 percent based on dollar volume. On an individual basis, the largest originator of small loans to businesses, by number, is American Express Bank, FSB with a 28 percent market share. Therefore, a comparison based on dollar volume of loans is more meaningful.

MSA 42680 (Sebastian-Vero Beach)/Indian River County

Lending activity reflects good responsiveness to the credit needs in the full-scope Sebastian-Vero Beach MSA assessment area, given performance context. HMDA lending activity reflects excellent responsiveness to the credit needs and small loans to businesses reflects good responsiveness to assessment area needs.

Home mortgage lending activity is excellent, when the Bank's deposit market share and rank is compared with its HMDA loan market share and rank when consideration is given to performance context. The Bank's market share of HMDA loan originations in the Sebastian-Vero Beach MSA assessment area exceeds its deposit market share and its rank for HMDA loan originations.

SNB's deposit market share in the overall Sebastian-Vero Beach MSA assessment area was 5.60 percent and the Bank was ranked seventh, according to FDIC data as of June 30, 2011. The Bank's market share of all HMDA loan originations and purchases was 6.60 percent and it was ranked fourth of 256 lenders reporting HMDA activity in the assessment area, based on 2011 aggregate data. SNB was ranked second for home purchase loans, first for home improvement loans, and sixth for refinance loans. However, when only local financial institutions that are not nation-wide, large regional, or mortgage company lenders are considered, the Bank would be ranked first. Leading lenders include Wells Fargo Bank, NA, J.P. Morgan Chase Bank, NA, and Bank of America with market shares of 18.33 percent, 10.39 percent, and 6.87 percent, respectively.

Competition for mortgage loans is strong in the assessment area. As noted above, there are a very large number of lenders reporting loans under the HMDA, many of them among the largest mortgage lenders in the United States. Most are mortgage companies and financial institutions that do not take deposits in the assessment area. In 2011, there were eight financial institutions reporting deposits in the Sebastian-Vero Beach MSA assessment area and 256 lenders reporting HMDA loans.

Small business lending activity is good, when the Bank's deposit market share and rank is compared with its market share and rank of small loans to businesses. The Bank's market share of small loans to businesses exceeds its deposit market share, and its rank for small loans in the assessment area is somewhat lower than its deposit market share rank, considering the dollar amount of loans.

FDIC data as of June 30, 2011, shows that SNB had a deposit market share of 5.6 percent and it was ranked seventh among eight financial institutions reporting deposits in the assessment area. Using 2011 aggregate data, SNB's market share of small loans to businesses was 7.74 percent, based on the dollar amount of loans and the Bank was ranked fifteenth of 47 lenders reporting small loans to businesses in the assessment area. The comparison is based on the dollar volume of loans rather than the number of loans because of the inclusion of credit card lenders in the reporting of small loans to businesses. Credit card lenders originate a large number of loans, but the dollar volume is significantly smaller. For example, the top eight reporters of small loans to businesses in 2011 are credit card lenders that do not take deposits in the assessment area. Combined, these eight lenders have a market share of 76 percent based on the number of loans, but only 37 percent based on dollar volume. On an individual basis, the largest originator of small loans to businesses, by number, is American Express Bank, FSB with a 25 percent market share. Because of this situation, a comparison based on dollar volume of lending is more reflective of the Bank's performance.

Distribution of Loans by Income Level of the Geography

The overall distribution of loans by income level of the geography is good given performance context and considering the significant volume of assessment area lending. The geographic distribution of loans in the Port St. Lucie-Ft. Pierce full-scope assessment area is adequate, given performance context. The geographic distribution of loans in the Sebastian-Vero Beach MSA full-scope assessment area is good, given performance context. The geographic distribution of home mortgage loans is good and the geographic distribution of small loans to businesses is good, given performance context.

Home Mortgage Loans

Refer to Tables 2, 3, and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans is adequate, given performance context. The geographic distribution of home purchase, home improvement, and refinance loans is adequate, given performance context.

Conclusions regarding home mortgage loans are based on performance in moderate-income geographies. In the Port St. Lucie-Ft. Pierce assessment area there is very limited opportunity to lend in the three low-income geographies within the assessment area. According to the 2000 Census, there are only 1,200 owner-occupied housing units located in the three low-income geographies and competition for home mortgage lending is very strong, as noted in the Lending Activity discussion.

There are no low-income geographies in the Sebastian Vero Beach MSA assessment area and only four moderate-income geographies. These moderate-income geographies offer somewhat limited opportunities for home mortgage lending as they contain only 5,135 owner-occupied housing units, according to the 2000 Census and competition is very strong.

MSA 38940 (Port St. Lucie-Ft. Pierce, FL)/Martin and St. Lucie Counties

Overall, the geographic distribution of home mortgage loans in the Port St. Lucie-Ft. Pierce assessment area is adequate, given performance context. The geographic distribution of home purchase, home improvement, and refinance loans is adequate, given performance context.

The overall geographic distribution of home purchase loans is adequate, given performance context. In low-income geographies, the Bank originated no home purchase loans. In moderate-income geographies, the percentage of the Bank's home purchase loans is significantly below the percentage of owner-occupied housing units in such geographies. The Bank had no market share for home purchase loans in low-income geographies. In moderate-income geographies, the Bank's market share is somewhat below its overall market share of home purchase loans. Although such performance would generally be considered very poor, given performance context it is adequate.

The overall geographic distribution of home improvement loans is adequate, given performance context. In low-income geographies, the Bank originated no home improvement loans. For moderate-income geographies, the Bank's percentage of home improvement loans is significantly below the percentage of owner-occupied housing units in such geographies. The Bank's market share of home improvement loans in both low-income and moderate-income geographies is significantly below its overall market share of home improvement loans. Although such performance would generally be considered very poor, given performance context it is adequate.

The overall geographic distribution of refinance loans is adequate, given performance context. In low-income geographies, the Bank's percentage of refinance loans is somewhat lower than the percentage of owner-occupied housing units in such geographies. In moderate-income geographies, the percentage of the Bank's refinance loans is significantly below the percentage of owner-occupied housing units in such geographies. The Bank's market share of refinance loans in both low-income and in moderate-income geographies exceeds the Bank's market share of refinance loans. Although such performance would generally be considered poor, given performance context it is adequate.

MSA 42680 (Sebastian-Vero Beach)/Indian River County

Overall, the geographic distribution of home mortgage loans in the Sebastian-Vero Beach assessment area is adequate, given performance context. The geographic distribution of home purchase, home improvement, and refinance loans is adequate, given performance context.

The overall geographic distribution of home purchase loans is adequate, given performance context. In moderate-income geographies, the percentage of the Bank's home purchase loans is lower than the percentage of owner-occupied housing units in such geographies. The Bank's market share of home purchase loans in moderate-income geographies is significantly lower than its overall market share of home purchase loans. Although such performance would generally be considered poor, given performance context it is considered adequate.

The overall geographic distribution of home improvement loans is adequate, given performance context. In moderate-income geographies, the percentage of the Bank's home improvement loans is significantly lower than the percentage of owner-occupied housing units in such geographies. The Bank's market share of home improvement loans in moderate-income geographies is significantly lower than its overall market share of home improvement loans. Although such performance would generally be considered very poor, given performance context it is adequate.

The overall geographic distribution of refinance loans is adequate, given performance context. In moderate-income geographies, the percentage of the Bank's refinance loans is significantly lower than the percentage of owner-occupied housing units in such geographies. The Bank's market share of refinance loans in moderate-income geographies is also significantly lower than its overall market share of refinance loans. Although such performance would generally be considered very poor, given performance context it is considered adequate.

Small Loans to Businesses

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

The overall geographic distribution of small loans to businesses is excellent, given performance context.

Conclusions are based on performance in moderate-income geographies. Opportunities for lending to businesses in the three low-income geographies of the Port St. Lucie-Ft. Pierce assessment area were limited. Only 1,400 businesses or 2 percent of all the businesses in the assessment area are located there (based on 2011 Dun and Bradstreet data), and competition for such loans is strong both between banks operating in the area and credit card lenders, as noted in the discussion of Lending Activity.

There are no low-income geographies in the Sebastian-Vero Beach MSA full-scope assessment area. As in the Port St. Lucie-Ft. Pierce assessment area, opportunities are somewhat limited because there are only 3,455 businesses located in the four moderate-income geographies (based on 2011 Dun and Bradstreet data) in the overall Sebastian-Vero Beach MSA assessment area. Competition is also strong in this assessment area including banks and credit card lenders, as noted in the discussion of Lending Activity.

MSA 38940 (Port St. Lucie-Ft. Pierce, FL)/Martin and St. Lucie Counties

The geographic distribution of small loans to businesses is excellent, given performance context.

The Bank had no originated loans to businesses in low-income geographies and no market share. Although such performance would generally be considered very poor, given performance context it is considered adequate. In moderate-income geographies, the percentage of small loans to businesses exceeds the percentage of businesses located in moderate-income geographies and the Bank's market share of small loans to businesses in moderate-income geographies exceeds its overall market share of small loans to businesses.

MSA 42680 (Sebastian-Vero Beach)/Indian River County

The geographic distribution of small loans to businesses is excellent.

In moderate-income geographies, the percentage of small loans to businesses exceeds the percentage of businesses located in moderate-income geographies. The Bank's market share of small loans to businesses in moderate-income geographies exceeds its overall market share of small loans to businesses.

Lending Gap Analysis

No unexplained, conspicuous gaps in lending were identified. We evaluated the lending distribution in the full-scope assessment areas to determine if any unexplained conspicuous gaps existed. We reviewed lending reports detailing the volume of HMDA and small loans to businesses in low- and moderate-income geographies.

Inside/Outside Ratio

A substantial majority of the SNB's loans are within its overall assessment area. Overall, 99 percent by number and 99 percent by dollar of SNB's loans are within its assessment area. By loan product, 99 percent both number and dollar of HMDA loans, and 98 percent by number, and 99 percent by dollar of small loans to businesses are inside the Bank's assessment area. This performance had a positive impact on the Bank's overall geographic distribution analysis.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by income level of the borrower is excellent, given performance context. The borrower distribution of loans in the Port St. Lucie-Ft. Pierce full-scope assessment area is good, given performance context. The borrower distribution of loans in the Sebastian-Vero Beach MSA full-scope assessment area is excellent, given performance context. The borrower distribution of home mortgage loans is excellent and the borrower distribution of small loans to businesses is excellent, given performance context.

Home Mortgage Loans

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

The overall borrower distribution of home mortgage loans is good, given performance context. The borrower distribution of home purchase, home improvement, and refinance loans is good, given performance context.

Conclusions are primarily based on lending to moderate-income borrowers. During the rating period, the housing crisis and the national economic recession produced a decline in real estate values, record high foreclosures, high unemployment, and increases the population of homeless people. Bank's tightened underwriting standards, and the availability of subsidy programs and special mortgage loan programs were limited. These factors made it difficult for low- and even some moderate-income individuals and families to own a home. According to the Florida Housing Data Clearing House (FHDC), the median sales price of a home in St. Lucie County was \$104,000 and \$210,000 in Martin County. The HUD adjusted median family income level in 2011 for the MSA was \$56,200. Estimated annual income for low-income people would be less than \$29,100 (less than 50% of the median income) and less than \$44,960 for moderate-income people (less than 80% of the median). Increases in property taxes and insurance add to the difficulty of low-income people purchasing a home without a subsidized loan.

The Sebastian-Vero Beach MSA also has experienced similar economic conditions. The same factors made it difficult for low- and even some moderate-income individuals and families to own a home. According to FHDC, the median sales price of a home in Indian River County was \$141,000. The HUD adjusted median family income level in 2011 for the MSA was \$53,100. Estimated annual income for low-income people would be less than \$26,550 (less than 50% of the median income) and less than \$42,480 for moderate-income people (less than 80% of the median). Increases in property taxes and insurance add to the difficulty of low-income people purchasing a home without a subsidized loan.

For further discussion on performance context issues, please see the Market Profile in Appendix B.

MSA 38940 (Port St. Lucie-Ft. Pierce, FL)/Martin and St. Lucie Counties

Overall, the borrower distribution of home mortgage loans in the Port St. Lucie-Ft. Pierce assessment area is good. The borrower distribution of home purchase and refinance loans is good. The borrower distribution of home improvement is excellent.

The overall borrower distribution of home purchase loans is good, given performance context. The percentage of home purchase loans to low-income borrowers is somewhat lower than the percent of low-income families in the assessment area. The Bank's market share of home purchase loans to low-income borrowers is somewhat lower than its overall market share of home purchase loans. The percent of home purchase loans to moderate-income borrowers is near to the percent of moderate-income families in the assessment area and the Bank's market share of home purchase loans to moderate-income borrowers is near to its overall market share of home purchase loans.

The overall borrower distribution of home improvement loans is excellent, given performance context. The percent of the Bank's home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families in the assessment area. The Bank's market share of home improvement loans to low-income borrowers exceeds its overall market share of home improvement loans. In moderate-income geographies, the percentage of the Bank's home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the assessment area and the Bank's market share of home improvement loans to moderate-income borrowers exceeds its overall market share of home improvement loans.

The overall borrower distribution of refinance loans is good, given performance context. The percentage of the Bank's refinance loans to low-income borrowers is lower than the percentage of low-income families in the assessment area. The Bank's market share of refinance loans to low-income borrowers is near to its overall market share of refinance loans. The percent of refinance loans to moderate-income borrowers is near to the percentage of moderate-income families in the assessment area. The Bank's market share of refinance loans to moderate-income borrowers exceeds its overall market share of refinance loans.

MSA 42680 (Sebastian-Vero Beach)/Indian River County

Overall, the borrower distribution of home mortgage loans in the Sebastian-Vero Beach MSA is good. The borrower distribution of home purchase, home improvement, and refinance loans is good given performance context.

The overall borrower distribution of home purchase loans is good, given performance context. The percentage of home purchase loans to low-income borrowers is near to the percent of low-income families in the assessment area. However, the Bank's market share of home purchase loans to low-income borrowers is somewhat lower than its overall market share of home purchase loans. The percent of home purchase loans to moderate-income borrowers is near to the percent of moderate-income families in the assessment area and the Bank's market share of home purchase loans to moderate-income borrowers is near to its overall market share of home purchase loans.

The overall borrower distribution of home improvement loans is good, given performance context. The percent of the Bank's home improvement loans to low-income borrowers exceeds the percent of low-income families in the assessment area. The Bank's market share of home improvement loans to low-income borrowers exceeds its overall market share of home improvement loans. In moderate-income geographies, the percentage of the Bank's home improvement loans to moderate-income borrowers is near to the percentage of moderate-income families in the assessment area and the Bank's market share of home improvement loans to moderate-income borrowers is somewhat lower than its overall market share of home improvement loans.

The overall borrower distribution of refinance loans is good, given performance context. The percentage of the Bank's refinance loans to low-income borrowers is somewhat lower than the percentage of low-income families in the assessment area, given performance context. The Bank's market share of refinance loans to low-income borrowers exceeds its overall market share of refinance loans. The percent of refinance loans to moderate-income borrowers was near the percentage of moderate-income families in the assessment area. The Bank's market share of refinance loans to moderate-income borrowers exceeds its overall market share of refinance loans.

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.

MSA 38940 (Port St. Lucie-Ft. Pierce, FL)/Martin and St. Lucie Counties

The borrower distribution of small loans to businesses is good considering the percent of loans to small businesses and the size of the Bank's loans. The percentage of small loans to small businesses

(businesses with gross annual revenues of \$1 million or less) is somewhat lower than the percentage of such businesses in the assessment area. The Bank's market share of loans to small businesses exceeds its market share of loans to all businesses. In addition, 69 percent of the Bank's small loans to businesses are for amounts of \$100,000 or less, indicating such loans is meeting the needs of smaller businesses.

MSA 42680 (Sebastian-Vero Beach)/Indian River County

The borrower distribution of small loans to businesses is excellent considering the percent of loans to small businesses and the size of the Bank's loans. The percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) is near to the percentage of such businesses in the assessment area. The Bank's market share of loans to small businesses exceeds its market share of loans to all businesses. Furthermore, 54 percent of the Bank's small loans to businesses are for amounts of \$100,000 or less, indicating such loans is meeting the needs of smaller businesses.

Community Development (CD) 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.

Overall, community development lending is excellent and it had a significantly positive impact on the Lending Test. In Port St. Lucie-Ft. Pierce MSA, CD lending was excellent with a significant positive impact. In the Sebastian-Vero Beach MSA, community development lending is good with a positive impact on the Lending Test. SNB originated a high dollar amount of community development loans that were responsive to assessment area needs and consistent with available opportunities. (For a discussion of community development lending opportunities, see the Market Profile in Appendix B).

MSA 38940 (Port St. Lucie-Ft. Pierce, FL)/Martin and St. Lucie Counties

During the evaluation period, SNB made 21 CD loans, totaling \$6.7 million. Of the total, eighteen were for services targeted toward low- and moderate-income people, and two were to meet affordable housing needs in the Port St. Lucie-Ft. Pierce MSA. These loans are responsive to the need for affordable rental housing for low- and moderate-income individuals, services for the increasing number of people and families experiencing poverty, and stabilization needs noted as needs of the assessment area

MSA 42680 (Sebastian-Vero Beach)/Indian River County

In the Sebastian-Vero Beach MSA assessment area, SNB originated five community development loans totaling \$1 million during the evaluation period providing valuable services for low- and moderate-income people. These loans provided working capital to non-profit organizations that assist disadvantaged youths and senior citizens.

Product Innovation and Flexibility

Overall, product innovation and flexibility had a positive impact on the Lending Test. Product innovation and flexibility had a positive impact on the Lending Test in both the full-scope Port St. Lucie-Ft. Pierce and Sebastian-Vero Beach MSA assessment areas. SNB's products provided home mortgage loan opportunities for a good number of low- and moderate-income borrowers who might not have otherwise had the opportunity.

The Bank offered several home mortgage loan products during the evaluation period to low- and moderate-income people, as described below. The loans noted here were included in the geographic distribution and borrower distribution analysis already discussed.

State Housing Initiative Partnership Loans (8 loans; \$516,000)

Flexible State Housing Initiative Partnership (SHIP) loans are offered through SNB's partnership with local lending consortiums. The funds provide down payment and closing cost assistance. The underwriting of SHIP loans allows for expanded expense ratios, and non-traditional credit histories are accepted. A maximum 90 percent loan-to-value-ratio is acceptable without private mortgage insurance. In conjunction with these loans, the Bank frequently uses zero interest second mortgage loans under the HOME Program administered by the Florida Housing Finance Corporation or the Guarantee Housing Loan Program offered by the United States Department of Agriculture (USDA) Rural Development in order to qualify the borrower. The product has the same borrower income restrictions as noted for the Affordable Homebuyers Program but the volume of loans noted above include only those borrowers whose income did not exceed 80 percent of the HUD median family income for the county or MSA. Of the eight loans, SNB originated seven loans in the Port St. Lucie-Ft. Pierce full-scope assessment area and none in the Sebastian-Vero Beach MSA.

Florida Homebuyer Opportunity Program (FHOP) (6 loans; \$508,000 million)

This is a subsidized loan through SNB's partnership with local lending consortiums. FHOP is designed in response to the legislative provision requiring SHIP local governments to expend 2009 and 2010 funds to ensure that residents of the state derive the maximum possible economic benefit from the federal first time homebuyer tax credit created through the American Recovery and Reinvestment Act of 2009. It provided subordinate down payment assistance loans to first time homebuyers for owner occupied primary residences. The loans can be repaid with the income tax refund the homebuyer is entitled to under the First Time Homebuyer Credit. SNB originated five of the loans in Port St. Lucie-Ft. Pierce full-scope assessment area and one loan in the Sebastian-Vero Beach full-scope assessment area.

Special Home Improvement Home Equity Loan Program (6 loans; \$95,000)

This product is targeted to low- and moderate-income individuals and families with incomes that do not exceed 80 percent of the HUD median family income for the county or MSA and reside in a low- or moderate-income geography. The loan is priced below current rates and the borrower incurs no loan fees. Of the six loans, one originated in the Port St. Lucie-Ft. Pierce full-scope assessment area and none originated in the Sebastian-Vero Beach MSA.

Federal Housing Administration (FHA) Loans (140 loans; \$12.5 million)

In January 2009, the Bank began to offer FHA mortgage loans, including the 203K purchase/rehabilitation product throughout its assessment areas. The product allows for a flexible source of funds for down payment and/or closing costs, expanded ratios, non-traditional credit history, and seller contributions. SNB uses this product to replace its proprietary Affordable Home Buyer product that was no longer saleable on the secondary market allowing it to continue offering a mortgage product that would assist low- and moderate-income homebuyers. Of the 140 loans, 97 originated in the full-scope Port St. Lucie-Ft. Pierce MSA and 27 originated in the Sebastian- Vero Beach MSA.

Neighborhood Stabilization Program (NSP) (6 loans; \$466,000)

The NSP was established for stabilizing communities that have suffered from foreclosures and abandonment. The program provides grants to all states for the purchase and redevelopment of foreclosed and abandoned homes. SNB originate all six loans in the full scope Port St. Lucie-Ft. Pierce MSA.

USDA Rural Development (15 loans; \$1.3 million)

This is a loan guaranteed program for affordable home loans. SNB originated four loans in the Port St. Lucie-Ft. Pierce MSA and seven loans in the Sebastian-Vero Beach MSA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the Bank’s performance under the Lending Test in all the limited-scope assessment areas is weaker than the Bank’s overall “Outstanding” performance under the Lending Test. The weaker performance did not impact the Bank’s rating under the Lending Test, given the level of retail deposits in each of the areas. 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 “High Satisfactory”, considering the positive impact in three limited-scope assessment areas, limited opportunities available to the Bank, and performance context. The Bank’s performance in the Port St. Lucie-Ft. Pierce assessment area is good and adequate in the Sebastian- Vero Beach MSA assessment area considering the performance context.

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

Overall, the Bank’s community development investments are highly responsive to assessment area needs, addressing primarily community service and affordable housing needs for low- and moderate-income people. Investments are not considered innovative or complex. Private investors routinely provide these types of qualified investments. Opportunities exist in the full-scope assessment area for the Bank to make qualified investments; however, they are limited and highly competitive, particularly in light of current economic conditions and the Bank’s overall financial condition. For a discussion of investment opportunities, see the Market Profile in Appendix B.

SNB has committed \$4 million to a small business investment corporation in the process of formation that will cover a broader area that includes SNB’s assessment area. We considered this commitment only in the context of gaining an understanding of the Bank’s investment activity and capacity and not as a current period investment.

MSA 38940 (Port St. Lucie-Ft. Pierce, FL)/Martin and St. Lucie Counties

The Bank's performance in the full-scope Port St. Lucie-Ft. Pierce assessment area is good considering the impact of the assessment area investment and given performance context and the financial condition of the Bank.

Current Period Investments: SNB's current period investments in the full-scope Port St. Lucie-Ft. Pierce assessment area consist of five mortgage backed securities that consists of loan pools to low- and moderate-income people, one Small Business Administration Pool investment that supports small business investment, grants and donations. Affordable housing needs are considered the most important in the assessment area and investments are highly responsive to those needs as well as helping to address the issue of foreclosed homes. Grants and donations are to organizations that support affordable housing efforts and community service needs to low- and moderate- income people that have expanded in light of current economic conditions in the assessment area.

Prior Period Investments: One mortgage backed investment pool, with a current book value of \$1.2 million with \$284,000 allocated to the Port St. Lucie-Ft. Pierce assessment area. The investment supports affordable housing to low-and moderate-income people.

MSA 42680 (Sebastian-Vero Beach)/Indian River County

Performance in the Sebastian-Vero Beach MSA assessment area is adequate, considering performance context factors.

Current Period Investments: Current period investments in the Sebastian-Vero Beach MSA consist entirely of donations and grants totaling \$34,000. Grants and donations are to organizations that support community service needs of low- and moderate- income people that have expanded in light of current economic conditions in the assessment area.

Prior Period Investments: One mortgage backed investment pool, with a current book value of \$1.2 million with \$93,000 allocated to the Sebastian-Vero Beach MSA assessment area. The investment supports affordable housing to low-and moderate-income people.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the Bank's performance under the Investment Test in the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) and the MSA 37340 (Melbourne-Titusville-Palm Bay, FL) and the MSA 36740 (Orlando-Kissimmee, FL) assessment areas was stronger than the Bank's overall "High Satisfactory" rating and it had a positive impact on the overall rating. Performance in the Non-MSA Counties assessment area was not inconsistent with the Bank's overall high satisfactory performance. This performance had a positive impact on the overall Investment Test rating. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

SERVICE TEST

SNB's performance under the Service Test is rated "Outstanding". Based on a full-scope review, the Bank's performance in the Port St. Lucie-Ft. Pierce assessment area is excellent. Based on a full-scope

review, performance in the Sebastian-Vero Beach MSA assessment area is good, given community development services. Delivery systems are readily accessible to geographies and individuals of different income levels throughout the full-scope assessment area. The Bank is sometimes a leader in providing community development services and provides a high level of such services.

Retail Banking Services

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

Office hours and services in both full-scope assessment areas are comparable among locations regardless of the income level of the geography. Branch locations, which are discussed below, are augmented by a variety of alternative delivery systems including ATMs, telephone banking, and online banking with bill pay. All branch offices, with the exception of one Martin County branch in an upper-income geography, provide ATMs. There is no data as to the impact of telephone and online banking on low- and moderate-income people; therefore, no significant weight was given to these systems.

A wide range of banking products and services are offered throughout both full-scope assessment areas, as described in the Bank's Public File. Of particular note are the free personal and business checking accounts offered by the Bank that require no minimum balance and have no monthly maintenance fee. In the full-scope Port St. Lucie-Ft. Pierce assessment area, the Bank opened approximately 5,790 free personal checking accounts and 702 free business checking accounts during the evaluation period. In the Sebastian-Vero Beach MSA assessment area, there were 2,220 free personal checking accounts and 321 free business checking accounts opened. SNB also offers a no minimum balance savings account (Sail into Savings). There were 996 accounts opened in the Port St. Lucie-Ft. Pierce assessment area and 379 accounts opened in the Sebastian-Vero Beach assessment area.

MSA 38940 (Port St. Lucie-Ft. Pierce, FL)/Martin and St. Lucie Counties

Branches are readily accessible in the full-scope Port St. Lucie-Ft. Pierce assessment area. There are no branches located in low-income geographies however only 3.6 percent of the 319,000 persons residing in the assessment area (based on the 2000 Census) live in the three low-income geographies in the assessment area. The percent of branches in moderate-income geographies is near to the percent of population residing in moderate-income geographies. However, when consideration is given to two branches in middle-income geographies that were originally located in moderate-income geographies, the Bank provides excellent accessibility to residents of the moderate-income geographies in the full-scope Port St. Lucie-Ft. Pierce assessment area.

Prior to the 2003 Office of Management and Budget (OMB) changes in census tract (geographies) designations, the Cove Road and Wedgewood branches were actually in moderate-income geographies. Although the branches did not move, it appears that the line designating tract boundaries was moved to the opposite side of the road, and the branch tract designation was changed. These two branches continue to serve the same moderate-income community they did in the past.

There were no branch openings during the evaluation period. There was one branch closing in an upper-income geography, but that did not negatively affect the overall accessibility of delivery systems in the full-scope assessment area. The branch closing had a neutral impact on branch distribution.

MSA 42680 (Sebastian-Vero Beach)/Indian River County

Branches are reasonably accessible in the full-scope Sebastian-Vero Beach MSA assessment area.

There are no low-income geographies in the Sebastian-Vero Beach MSA assessment area. There are four moderate-income geographies but no SNB branches are located there. About 16 percent of the 112,947 persons residing in the assessment area (based on 2000 Census) live in those moderate-income geographies. Seventy-five percent of the Bank's branches are in middle-income geographies where 62 percent of the population resides. The Bank's branches are located on major roadways, generally within retail business districts.

No branches were opened or closed in the Sebastian-Vero Beach MSA assessment area. This had a neutral impact on the retail portion of the Service Test.

Community Development Services

Considering the level of participation and the number of organizations and individuals benefiting, the overall level of community development services is excellent, with the Bank taking a leadership role and providing some complex services. Although the services are not innovative, they are responsive to stated assessment area needs.

Community development services are excellent in the full-scope Port St. Lucie-Ft. Pierce assessment area and good in the Sebastian-Vero Beach MSA full-scope assessment area.

MSA 38940 (Port St. Lucie-Ft. Pierce, FL)/Martin and St. Lucie Counties

SNB provided an excellent level of assistance to organizations that support services targeted to low- and moderate-income people in the Port St. Lucie-Ft. Pierce MSA assessment area. Some 130 different officers and employees used their financial expertise to provide technical assistance to 28 different organizations that address the assessment area needs including, services for low- and moderate-income individuals and families, economic development, revitalization and or stabilization of low- or moderate-income sectors of the community, and affordable housing. Employees recorded 3,032 hours spent on assistance.

During the evaluation period, the Bank participated in ten homeownership workshops attended by approximately 180 people. The seminars were held in conjunction with the Martin County or St. Lucie County Lending Consortiums and CredAbility, formerly known as, the Consumer Credit Counseling Service, which primarily serves low- and moderate-income people. These regularly scheduled, 8-hour, multi-lingual courses cover the pre-home buying process including the mortgage application process, realtor relations, insurance needs, credit and budgeting, appraisals and inspections, and available subsidy programs. An SNB officer has assumed a leadership role in scheduling and organizing all the workshops conducted by the two Consortiums by serving as Chairperson and Treasurer of both the Martin County and St. Lucie County Lending Consortiums. Five different SNB officers volunteered as instructors for the Bank's programs.

In April 2012, SNB selected a community lending officer who originates mortgages derived primarily from outreach efforts educating groups of interested borrowers, strategic referral sources, local governmental agencies, and interest groups. He works closely with other SNB residential mortgage loan officers and retail banking partners on the opportunities, and processes necessary for home ownership and financial positioning through the utilization of SNB's equity lending programs. The focus of this

position is primarily on low- and moderate-income borrowers and community lending programs. He is also the in-market point person with non-profit housing partners or interested realtors. Some activities include eight seminars with 218 participants, six counseling sessions with 70 people, and 96 National Stabilization Program (NSP) applications.

One SNB officer provides technical assistance for the monitoring direct subsidies under the Affordable Housing Program (AHP) of the Federal Home Loan Bank of Atlanta (FHLBA). For SNB, participation in the AHP is complex, requiring considerable administrative time on the part of the sponsoring bank because it must write, administer, and disburse the funds as well as monitor the project and provide documentation to the FHLBA.

MSA 42680 (Sebastian-Vero Beach)/Indian River County

SNB provided a good level of assistance to organizations that support services targeted to low- and moderate- people in the Sebastian-Vero Beach MSA. Bank officers and employees regularly use their financial expertise to provide technical assistance to organizations that provide community development services in the Bank's Sebastian-Vero Beach MSA full-scope assessment area by serving on the board of directors, advisory councils, budget and allocation committees, or fundraising committees. In all, five different officers and employees used their financial expertise to provide technical assistance to nine different organizations that provide services to low-and moderate- income people and disadvantage youth programs during the evaluation period. Employees recorded 269 hours spent on assistance.

The community lending officer conducted eight seminars with 301 participants, 14 counseling sessions with 29 people. Although there were no NSP applications, several of the individuals receiving counseling expressed interest in a NSP program loan.

One Bank officer provides administrative oversight on the retention mechanism of a grant provided to construct a 41 unit affordable housing assisted living facility in Sebastian, Florida. The officer is monitoring to verify that the facility remains affordable housing for a 15-year period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the Bank's performance under the Service Test in the MSA 36740 (Seminole and Orange Counties, FL only) assessment area was not inconsistent with the Bank's overall "Outstanding" performance under the Service Test. The Bank's performance under the Service Test in the other limited-scope assessment areas is weaker than the Bank's overall performance. There are no branches in low- or moderate-income geographies in these assessment areas. Performance in the limited-scope assessment areas had a neutral impact on the overall Service Test conclusion. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and 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): (07/01/09 to 12/31/11) Investment and Service Tests and CD Loans: (08/31/09 to 08/31/2012)	
Financial Institution	Products Reviewed	
Seacoast National Bank Stuart, FL	HMDA, Small Business, and community development loans. Flexible and innovative products.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
MSA 38940 (Port St. Lucie-Ft. Pierce, FL)	Full-Scope	Office closed in December 2009
MSA 42680 (Sebastian-Vero Beach, FL)	Full-Scope	
MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL)-Dade and Palm Beach Counties only	Limited-Scope	
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	Limited-Scope	
MSA 36740 (Orlando-Kissimmee, FL)-Orange and Seminole Counties only	Limited-Scope	
MSA 37340 (Palm Bay-Melbourne- Titusville, FL)	Limited-Scope	
Non-MSA Counties	Limited-Scope	

Appendix B: Market Profiles for Full-Scope Areas

SNB has two full-scope assessment areas. The first includes all MSA 38940 (Port St. Lucie-Ft. Pierce, FL). The second includes all of MSA42680 (Sebastian-Vero Beach, FL) with similar economic characteristics. Both assessment areas, as well as the limited-scope assessment areas, meet the requirements of the CRA regulation and do not arbitrarily exclude low- and moderate-income geographies. The following provides detailed demographic information about the full-scope assessment areas.

MSA 38940

Demographic Information for Full Scope Area: MSA 38940 (Port St. Lucie-Ft. Pierce, FL)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	60	5.00	21.67	51.67	21.67	0.00
Population by Geography	319,426	3.58	17.57	57.55	21.31	0.00
Owner-Occupied Housing by Geography	104,166	1.15	11.40	62.21	25.24	0.00
Business by Geography	56,120	2.57	19.41	56.13	21.90	0.00
Farms by Geography	1,472	2.17	21.20	55.50	21.13	0.00
Family Distribution by Income Level	90,803	18.46	19.34	22.19	40.01	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	34,324	6.15	21.35	58.97	13.52	0.00
Median Family Income		45,503	Median Housing Value		97,335	
HUD Adjusted Median Family Income for 2011		56,200	Unemployment Rate (June 2011)		11.20%	
Households Below Poverty Level		10%				

(*) The NA category consists of geographies that have not been assigned an income classification.
 Source: 2000 US Census and 2011 HUD updated MFI.

The Port St. Lucie-Ft. Pierce MSA is comprised of two counties, Martin and St. Lucie Counties. St. Lucie is the larger of the two counties, with 60 percent of the total MSA population. All of the low-income (3) and 69 percent of the moderate-income (9) geographies in the MSA are located in St. Lucie County, primarily in Ft. Pierce. The city of Ft. Pierce has a population of approximately 38,000. Of that population, 31% live below the poverty level. Other major cities include Stuart and Port St. Lucie.

During the evaluation period, the state of Florida consistently ranks among the top five states in the nation for the number of home foreclosures, ranking fifth in December 2011. There has been some reduction in foreclosures but they remain high. Out of the top 25 MSAs in the country with the highest foreclosure rates, the Port St. Lucie-Ft. Pierce MSA foreclosure rate was the second highest according to an analysis tabulated by the Urban Institute in December 2011.

According to the Florida Housing Data Clearing House (FHDC), the median sales price of an existing single-family home in December 2011 for Martin County was \$210,000 and \$104,000 for St. Lucie County. When comparing these prices to the MSA's HUD Adjusted Median Family Income of \$56,200, it is clear that without the assistance of subsidies, low-income families would have difficulty purchasing

a home. Even moderate-income families would have difficulty without the use of special programs and the subsidies that have reduced because of funding cuts and stringent underwriting standards. The high costs of property taxes and insurance also pose added expense.

Local economic conditions remained weak during the evaluation period with the state and entire country in a recession. The housing and economic crisis resulted in a reduction of mortgage lending, and financial institutions posed stringent underwriting guidelines. Many financial institutions are working through high levels of foreclosures in the residential markets and reducing problem commercial real estate loans. Jobs declined, particularly in construction, contributed to high unemployment rates. As of December 2011, the unemployment rate in the MSA was 11.2 percent. This indicates a need for activities that support job creation, job placement and training programs, as well as community services for low- and moderate-income people and families.

The top five employers in Martin County include Martin Memorial Health Systems, Publix Supermarkets, Old Cell Phone, TurboCombustor Technologies Inc, and Florida Power and Light. Seacoast National Bank was sixth. The top five industries by employment include (1) trade, transportation and utilities, (2) education and health services, (3) leisure and hospitality, (4) professional and business services, and (5) manufacturing.

The top five employers in St. Lucie County include Wal-Mart, Liberty Medical Supply, QVC, Publix Supermarkets, and Lawnwood Regional medical Center. The top five industries by employment include (1) Trade, transportation and utilities, (2) education and health services, (3) leisure and hospitality, (4) professional and business services, and (5) public administration.

Despite continued consolidation of financial institutions, competition for financial services remained strong in the MSA. There are 23 different financial institutions operating 139 branches in the MSA (as of June 30, 2011), including national, regional, and community banks and savings and loan associations. In addition, mortgage companies and credit card lenders compete for loans in the assessment area. Their numbers far exceed the number of financial institutions operating in the assessment area.

There is a limited range of opportunities for community development lending, investments, and services throughout the MSA and larger institutions are quite competitive for the qualified investments that are available. Community development opportunities include providing technical assistance and financing to the several organizations whose mission is to provide affordable housing. However, the impact of the mortgage crisis has caused affordable housing organizations to change their focus from new construction to the acquisition, rehabilitation, and re-sale of previously foreclosed homes to low- and moderate-income families. Some of this activity can be funded through grants from the Neighborhood Stabilization Program (NSP) offered by the Department of Housing and Urban Development (HUD). Both counties in the MSA received NSP funding. Community development loan opportunities exist for bridge financing to help meet these needs as well as those of community development service organizations. The State of Florida has designated an Enterprise Zone in Ft. Pierce that targets economic development with the purpose of stimulating and retaining jobs. There are also multiple Community Redevelopment Areas in the MSA that are targeted for revitalization, which provides an opportunity for community development lending.

Community development investments options have also become limited. Mortgage-backed securities are an option but they have become expensive. SBA loan-backed securities are also available. Low Income Housing Tax credits remain available but they are generally complex for community banks and their viability depends on the financial condition of the bank. There are state and regional community

development financial institutions (CDFI's) and private equity organizations that need support for their community development activities. Opportunities exist to contribute to qualified non-profit organizations whose mission meets the definition of community development, particularly in the areas of job training and job placement as evidenced by the high unemployment rates in the MSA. However, the extent of these activities remains influenced by the financial condition of the banks.

Opportunities exist to provide financial literacy training in schools and in cooperation with local community organizations. This training could include homeownership, credit, and foreclosure counseling targeted to low- and moderate-income people.

MSA 42680 (Sebastian-Vero Beach FL)

Demographic Information for Full Scope Area: MSA 42680 (Sebastian-Vero Beach FL)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	23	0.00	17.39	56.52	26.09	0.00
Population by Geography	112,947	0.00	16.49	61.66	21.84	0.00
Owner-Occupied Housing by Geography	38,119	0.00	13.47	61.60	24.93	0.00
Business by Geography	30,063	0.00	11.49	60.55	27.96	0.00
Farms by Geography	905	0.00	14.14	65.64	20.22	0.00
Family Distribution by Income Level	32,901	17.61	19.63	22.39	40.37	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,252	0.00	22.26	66.07	11.67	0.00
Median Family Income		46,603	Median Housing Value		129,634	
HUD Adjusted Median Family Income for 2011		53,100	Unemployment Rate (December 2011)		11.10%	
Households Below Poverty Level		8%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2011 HUD updated MFI

The Sebastian Vero-Beach MSA is comprised of Indian River County. There are no low-income geographies, and there are four moderate-income geographies. The poverty level is 8 percent. Major cities include Sebastian, Vero Beach, and Fellsmere. The combined population is 112, 947.

During the evaluation period, the state of Florida consistently ranks among the top five states in the nation for the number of home foreclosures, ranking fifth in December 2011. There has been some reduction in foreclosures but they remain high. Out of the top 25 MSAs in the country with the highest foreclosure rates, the Sebastian-Vero Beach MSA foreclosure rate was the thirteenth highest according to an analysis tabulated by the Urban Institute in December 2011.

According to the Florida Housing Data Clearing House (FHDC), the median sales price of an existing single-family home in December 2011 for Indian River County was \$141,000. When this price is compared to the MSA's HUD Adjusted Median Family Income of \$53,100, it is clear that without the assistance of subsidies, low-income families would have difficulty purchasing a home. Even moderate-income families would have difficulty without the use of special programs and the subsidies that have reduced because of funding cuts and stringent underwriting standards. The high costs of property taxes

and insurance also pose added expense.

Local economic conditions remained weak during the evaluation period and the state and entire country were in a recession. The housing and economic crisis resulted in a reduction of mortgage lending, and financial institutions posed more stringent underwriting guidelines. Financial institutions attention was on working through the high levels of foreclosures in the residential markets, and reduction of problem commercial real estate loans. Jobs declined, particularly in construction causing unemployment rates to be high. As of December 2011, the unemployment rate in the MSA was 11.10 percent. This indicates a need for activities that support job creation, job placement and training programs, as well as community services for low- and moderate-income people and families.

The top five employers in Indian River County include Indian River Medical Center, Publix Supermarkets, Piper Aircraft, Inc, Sebastian River Medical Center, and John's Island (resort). The top five industries by employment include (1) trade, transportation and utilities, (2) education and health services, (3) leisure and hospitality, (4) professional and business services, and (5) public administration. The unemployment rate is high at 11.10 percent.

Despite continued consolidation of financial institutions, competition for financial services remained strong in the MSA. There are 17 different financial institutions operating 60 branches in the MSA (as of June 30, 2011), including national, regional, and community banks and savings and loan associations. In addition, mortgage companies and credit card lenders compete for loans in the assessment area. Their numbers far exceed the number of financial institutions operating in the assessment area.

There is a limited range of opportunities for community development lending, investments, and services throughout the MSA and larger institutions are competitive for the qualified investments that are available. Community development opportunities include providing technical assistance and financing to the several organizations whose mission is to provide affordable housing. However, the impact of the mortgage crisis has caused affordable housing organizations to change their focus from new construction to the acquisition, rehabilitation, and re-sale of previously foreclosed homes to low- and moderate-income families. Some of this activity can be funded through grants from the Neighborhood Stabilization Program (NSP) offered by the Department of Housing and Urban Development (HUD). Indian River County received NSP funding. Community development loan opportunities exist for bridge financing to help meet these needs as well as those of community development service organizations. The State of Florida has designated an Indian River/City of Vero Beach Enterprise Zone that encompasses all of the Vero Beach Municipal Airport and the adjacent Gifford community. This zone targets economic development with the goal of stimulating and retaining jobs.

Community development investments options have also become limited. Mortgage-backed securities are an option but they have become expensive. SBA loan-backed securities are also available. Low Income Housing Tax credits remain available but they are generally complex for community banks and their viability depends on the financial condition of the bank. There are state and regional community development financial institutions (CDFI's) and private equity organizations that need support for their community development activities. Opportunities exist to contribute to qualified non-profit organizations whose mission meets the definition of community development, particularly in the areas of job training and job placement as evidenced by the high unemployment rates in the MSA. However, the extent of these activities remains influenced by the financial condition of the banks.

Opportunities exist to provide financial literacy training in schools and in cooperation with local community organizations. This training could include homeownership, credit, and foreclosure counseling targeted to low- and moderate-income people.

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.

Institution ID: SEACOAST NATIONAL BANK

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011						
Assessment Area (2011):	% 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:												
MSA 38940 (Port St Lucie-Ft Pierce FL)	51.82	1,165	189,755	162	22,290	1	75	21	6,698	1,341	214,375	60.47
MSA 42680 (Sebastian-Vero Beach FL)	19.32	435	81,774	59	11,051	2	60	5	1,050	500	93,835	11.76
Limited Review:												
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	0.39	9	1,421	1	13	0	0	0	0	10	1,434	0.00
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch F)	9.00	191	72,875	33	8,815	7	172	2	2,150	233	84,012	4.59
MSA 36740 Partial (Seminole and Orange Counties FL)	3.67	47	16,976	48	12,998	0	0	2	4,173	95	29,974	6.18
MSA 37340 (Palm Bay-Melbourne-Titusville FL)	6.76	174	38,013	1	33	0	0	0	0	175	38,046	3.06
Non-MSA Counties	9.04	126	7,917	87	10,229	13	556	14	6,095	234	24,032	13.94

* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from September 01, 2009 to August 31, 2012.

*** Deposit Data as of June 30, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: SEACOAST NATIONAL BANK

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: FLORIDA				Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
MSA 38940 (Port St Lucie- Ft Pierce FL)	840	56.07	1.15	0.00	11.40	4.29	62.21	58.69	25.24	37.02	5.57	0.00	3.74	4.15	10.25	
MSA 42680 (Sebastian-Vero Beach FL)	299	19.96	0.00	0.00	13.47	4.35	61.60	67.22	24.93	28.43	9.25	0.00	2.88	10.12	9.26	
Limited Review:																
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	6	0.40	1.16	0.00	23.67	0.00	45.93	83.33	29.24	16.67	0.00	0.00	0.00	0.01	0.00	
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch FL)	126	8.41	1.53	0.79	24.63	6.35	36.35	23.81	37.50	69.05	0.33	0.00	0.13	0.15	0.54	
MSA 36740 Partial (Seminole and Orange Counties FL)	29	1.94	0.86	0.00	14.02	6.90	43.19	17.24	41.93	75.86	0.12	0.00	0.10	0.05	0.18	
MSA 37340 (Palm Bay-Melbourne-Titusville FL)	147	9.81	0.62	0.00	17.75	25.85	49.76	41.50	31.87	32.65	1.09	0.00	2.06	0.76	1.40	
Non-MSA Counties	51	3.40	0.00	0.00	10.32	1.96	89.66	98.04	0.02	0.00	1.18	0.00	0.00	1.26	0.00	

* Based on 2011 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 2000 Census information.

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

Institution ID: SEACOAST NATIONAL BANK

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT												Geography: FLORIDA				Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
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***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
MSA 38940 (Port St Lucie- Ft Pierce FL)	98	52.41	1.15	0.00	11.40	5.10	62.21	58.16	25.24	36.73	14.02	0.00	5.56	13.99	18.00					
MSA 42680 (Sebastian-Vero Beach FL)	28	14.97	0.00	0.00	13.47	0.00	61.60	78.57	24.93	21.43	16.44	0.00	0.00	17.78	18.18					
Limited Review:																				
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	0	0.00	1.16	0.00	23.67	0.00	45.93	0.00	29.24	0.00	0.00	0.00	0.00	0.00	0.00					
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch FL)	7	3.74	1.53	0.00	24.63	0.00	36.35	14.29	37.50	85.71	0.24	0.00	0.00	0.00	0.44					
MSA 36740 Partial (Seminole and Orange Counties FL)	1	0.53	0.86	0.00	14.02	0.00	43.19	0.00	41.93	100.00	0.17	0.00	0.00	0.00	0.37					
MSA 37340 (Palm Bay-Melbourne-Titusville FL)	6	3.21	0.62	0.00	17.75	33.33	49.76	16.67	31.87	50.00	1.93	0.00	2.70	0.76	3.37					
Non-MSA Counties	47	25.13	0.00	0.00	10.32	2.13	89.66	97.87	0.02	0.00	17.54	0.00	0.00	19.42	0.00					

* Based on 2011 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 2000 Census information.

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

Institution ID: SEACOAST NATIONAL BANK

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011						
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:															
MSA 38940 (Port St Lucie- Ft Pierce FL)	226	49.13	1.15	0.88	11.40	3.98	62.21	57.52	25.24	37.61	2.39	33.33	3.60	2.41	2.17
MSA 42680 (Sebastian-Vero Beach FL)	107	23.26	0.00	0.00	13.47	4.67	61.60	57.01	24.93	38.32	2.79	0.00	0.99	2.79	3.10
Limited Review:															
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	3	0.65	1.16	0.00	23.67	0.00	45.93	33.33	29.24	66.67	0.01	0.00	0.00	0.00	0.01
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch FL)	58	12.61	1.53	0.00	24.63	3.45	36.35	15.52	37.50	81.03	0.18	0.00	0.00	0.05	0.26
MSA 36740 Partial (Seminole and Orange Counties FL)	17	3.70	0.86	0.00	14.02	0.00	43.19	23.53	41.93	76.47	0.08	0.00	0.00	0.04	0.10
MSA 37340 (Palm Bay-Melbourne-Titusville FL)	21	4.57	0.62	0.00	17.75	14.29	49.76	33.33	31.87	52.38	0.12	0.00	0.48	0.15	0.04
Non-MSA Counties	28	6.09	0.00	0.00	10.32	0.00	89.66	100.00	0.02	0.00	1.29	0.00	0.00	1.36	0.00

* Based on 2011 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 2000 Census information.

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

Institution ID: SEACOAST NATIONAL BANK

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: FLORIDA					Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	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:																
MSA 38940 (Port St Lucie- Ft Pierce FL)	1	50.00	2.19	0.00	14.37	0.00	43.56	100.00	39.88	0.00	25.00	0.00	0.00	33.33	0.00	
MSA 42680 (Sebastian-Vero Beach FL)	1	50.00	0.00	0.00	18.93	0.00	45.98	0.00	35.08	100.00	16.67	0.00	0.00	0.00	100.00	
Limited Review:																
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	0	0.00	2.27	0.00	32.48	0.00	48.64	0.00	16.61	0.00	0.00	0.00	0.00	0.00	0.00	
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch FL)	0	0.00	3.13	0.00	32.78	0.00	31.51	0.00	32.58	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 36740 Partial (Seminole and Orange Counties FL)	0	0.00	2.73	0.00	27.37	0.00	50.42	0.00	19.47	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 37340 (Palm Bay-Melbourne-Titusville FL)	0	0.00	2.10	0.00	26.13	0.00	53.00	0.00	18.77	0.00	0.00	0.00	0.00	0.00	0.00	
Non-MSA Counties	0	0.00	0.00	0.00	12.76	0.00	87.09	0.00	0.15	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2011 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 2000 Census information.

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

Institution ID: SEACOAST NATIONAL BANK

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: FLORIDA				Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
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:																				
MSA 38940 (Port St Lucie- Ft Pierce FL)	162	41.43	1.99	0.00	16.05	33.95	59.41	41.36	22.54	24.69	1.31	0.00	2.19	1.11	1.26					
MSA 42680 (Sebastian-Vero Beach FL)	59	15.09	0.00	0.00	11.49	13.56	60.55	47.46	27.96	38.98	1.29	0.00	1.31	1.00	1.85					
Limited Review:																				
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	1	0.26	4.01	0.00	19.65	0.00	41.33	100.00	35.01	0.00	0.00	0.00	0.00	0.00	0.00					
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch FL)	33	8.44	2.78	0.00	19.29	15.15	34.19	45.45	43.62	39.39	0.05	0.00	0.04	0.06	0.05					
MSA 36740 Partial (Seminole and Orange Counties FL)	48	12.28	1.39	2.08	16.59	16.67	39.48	43.75	42.54	37.50	0.12	0.22	0.17	0.15	0.07					
MSA 37340 (Palm Bay-Melbourne- Titusville FL)	1	0.26	0.82	0.00	19.86	0.00	46.97	100.00	32.35	0.00	0.00	0.00	0.00	0.00	0.00					
Non-MSA Counties	87	22.25	0.00	0.00	11.30	1.15	88.70	98.85	0.00	0.00	1.80	0.00	0.00	2.11	0.00					

* Based on 2011 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 (2011).

Institution ID: SEACOAST NATIONAL BANK

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: FLORIDA				Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					Market Share (%) by Geography				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans	% of Farms** *	% BANK Loans						
Full Review:																
MSA 38940 (Port St Lucie- Ft Pierce FL)	1	4.35	1.70	0.00	17.98	100.00	60.45	0.00	19.87	0.00	3.70	0.00	20.00	0.00	0.00	
MSA 42680 (Sebastian-Vero Beach FL)	2	8.70	0.00	0.00	14.14	0.00	65.64	50.00	20.22	50.00	10.00	0.00	0.00	0.00	100.00	
Limited Review:																
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	0	0.00	3.30	0.00	21.23	0.00	42.51	0.00	32.96	0.00	0.00	0.00	0.00	0.00	0.00	
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch FL)	7	30.43	2.82	0.00	23.02	0.00	34.77	100.00	39.38	0.00	9.09	0.00	0.00	26.09	0.00	
MSA 36740 Partial (Seminole and Orange Counties FL)	0	0.00	1.33	0.00	14.61	0.00	45.49	0.00	38.56	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 37340 (Palm Bay-Melbourne-Titusville FL)	0	0.00	1.07	0.00	17.84	0.00	53.53	0.00	27.56	0.00	0.00	0.00	0.00	0.00	0.00	
Non-MSA Counties	13	56.52	0.00	0.00	6.55	0.00	93.45	100.00	0.00	0.00	4.94	0.00	0.00	5.56	0.00	

* Based on 2011 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 (2011).

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Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA					Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					Market Share				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total	% Families	% BANK Loans****	% Families	% BANK Loans***	% Families	% BANK Loans**	% Families*	% BANK Loans****						
Full Review:																
MSA 38940 (Port St Lucie- Ft Pierce FL)	840	56.07	18.46	6.57	19.34	19.12	22.19	19.00	40.01	55.32	6.63	3.52	5.05	4.86	9.06	
MSA 42680 (Sebastian-Vero Beach FL)	299	19.96	17.61	10.70	19.63	19.06	22.39	17.39	40.37	52.84	10.86	10.28	10.14	9.67	11.67	
Limited Review:																
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	6	0.40	20.85	0.00	18.17	0.00	20.48	50.00	40.50	50.00	0.01	0.00	0.00	0.02	0.00	
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch FL)	126	8.41	19.86	0.79	18.56	11.11	20.60	15.87	40.98	72.22	0.38	0.00	0.07	0.26	0.60	
MSA 36740 Partial (Seminole and Orange Counties FL)	29	1.94	17.89	0.00	17.59	17.24	21.98	0.00	42.54	82.76	0.14	0.00	0.12	0.00	0.24	
MSA 37340 (Palm Bay-Melbourne-Titusville FL)	147	9.81	18.27	6.80	19.30	15.65	22.67	21.77	39.76	55.78	1.28	0.83	0.78	0.50	2.02	
Non-MSA Counties	51	3.40	20.04	5.88	19.97	31.37	23.23	19.61	36.76	43.14	1.49	0.00	0.86	2.03	1.80	

* Based on 2011 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 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 0.2% of loans originated and purchased by Bank.

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Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011							
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****	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 38940 (Port St Lucie- Ft Pierce FL)	98	52.41	18.46	9.38	19.34	22.92	22.19	34.38	40.01	33.33	14.36	19.05	16.33	17.86	9.21
MSA 42680 (Sebastian-Vero Beach FL)	28	14.97	17.61	17.86	19.63	17.86	22.39	25.00	40.37	39.29	16.90	28.57	7.14	18.75	17.65
Limited Review:															
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	0	0.00	20.85	0.00	18.17	0.00	20.48	0.00	40.50	0.00	0.00	0.00	0.00	0.00	0.00
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch FL)	7	3.74	19.86	0.00	18.56	14.29	20.60	14.29	40.98	71.43	0.25	0.00	0.00	0.00	0.51
MSA 36740 Partial (Seminole and Orange Counties FL)	1	0.53	17.89	0.00	17.59	0.00	21.98	0.00	42.54	100.00	0.18	0.00	0.00	0.00	0.41
MSA 37340 (Palm Bay-Melbourne- Titusville FL)	6	3.21	18.27	0.00	19.30	0.00	22.67	50.00	39.76	50.00	1.99	0.00	0.00	4.65	2.94
Non-MSA Counties	47	25.13	20.04	13.04	19.97	28.26	23.23	26.09	36.76	32.61	17.59	15.79	18.18	20.83	15.63

* Based on 2011 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 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchased by Bank.

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Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA						Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011							
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 ^{***}	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 38940 (Port St Lucie- Ft Pierce FL)	226	49.13	18.46	4.44	19.34	18.67	22.19	20.00	40.01	56.89	3.27	2.47	3.86	3.56	3.12
MSA 42680 (Sebastian-Vero Beach FL)	107	23.26	17.61	7.55	19.63	16.98	22.39	21.70	40.37	53.77	3.70	7.41	4.26	2.88	3.55
Limited Review:															
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	3	0.65	20.85	0.00	18.17	0.00	20.48	66.67	40.50	33.33	0.01	0.00	0.00	0.05	0.00
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch FL)	58	12.61	19.86	3.45	18.56	12.07	20.60	1.72	40.98	82.76	0.23	0.18	0.08	0.00	0.33
MSA 36740 Partial (Seminole and Orange Counties FL)	17	3.70	17.89	0.00	17.59	5.88	21.98	17.65	42.54	76.47	0.10	0.00	0.00	0.05	0.15
MSA 37340 (Palm Bay-Melbourne- Titusville FL)	21	4.57	18.27	9.52	19.30	14.29	22.67	0.00	39.76	76.19	0.16	0.00	0.00	0.00	0.29
Non-MSA Counties	28	6.09	20.04	3.70	19.97	29.63	23.23	29.63	36.76	37.04	1.70	4.76	3.09	0.00	1.74

[†] Based on 2011 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 2000 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 0.7% of loans originated and purchased by Bank.

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Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA			Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
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:									
MSA 38940 (Port St Lucie- Ft Pierce FL)	162	41.43	72.16	46.30	69.14	14.81	16.05	1.31	1.16
MSA 42680 (Sebastian-Vero Beach FL)	59	15.09	53.40	52.54	54.24	18.64	27.12	1.29	1.54
Limited Review:									
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	1	0.26	70.49	100.00	100.00	0.00	0.00	0.00	0.00
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch FL)	33	8.44	70.34	45.45	33.33	24.24	42.42	0.05	0.06
MSA 36740 Partial (Seminole and Orange Counties FL)	48	12.28	70.05	58.33	39.58	14.58	45.83	0.12	0.13
MSA 37340 (Palm Bay-Melbourne-Titusville FL)	1	0.26	64.34	0.00	100.00	0.00	0.00	0.00	0.00
Non-MSA Counties	87	22.25	51.36	64.37	68.97	18.39	12.64	1.80	2.87

* Based on 2011 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 - 2011).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.77% of small loans to businesses originated and purchased by the Bank.

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Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: FLORIDA			Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011				
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:									
MSA 38940 (Port St Lucie- Ft Pierce FL)	1	4.35	95.30	0.00	100.00	0.00	0.00	3.70	0.00
MSA 42680 (Sebastian-Vero Beach FL)	2	8.70	94.25	0.00	100.00	0.00	0.00	10.00	0.00
Limited Review:									
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	0	0.00	97.37	0.00	0.00	0.00	0.00	0.00	0.00
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch FL)	7	30.43	96.20	100.00	100.00	0.00	0.00	9.09	13.04
MSA 36740 Partial (Seminole and Orange Counties FL)	0	0.00	96.31	0.00	0.00	0.00	0.00	0.00	0.00
MSA 37340 (Palm Bay-Melbourne-Titusville FL)	0	0.00	98.14	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA Counties	13	56.52	91.95	69.23	100.00	0.00	0.00	4.94	6.45

* Based on 2011 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 - 2011).

**** 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 13.04% of small loans to farms originated and purchased by the Bank.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: FLORIDA									
Evaluation Period: JULY 1, 2009 TO August 31, 2012									
Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
MSA 38940 (Port St Lucie- Ft Pierce FL)	1	313	155	1,533	156	1,818	35.69	0	0
MSA 42680 (Sebastian-Vero Beach FL)	1	93	35	80	36	173	3.4	0	0
Statewide	1	659	1	162	2	821	16.12	1	4,000
Limited Review:									
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	0	0	0	0	0	0	0.00	0	0
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch FL)	1	520	5	32	6	552	10.84	0	0
MSA 36740 Partial (Seminole and Orange Counties FL)	1	202	4	505	5	707	13.88	0	0
MSA 37340 (Palm Bay-Melbourne- Titusville FL)	1	123	1	312	2	435	8.53	0	0
Non-MSA Counties	0	0	76	588	76	588	11.54	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.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: FLORIDA				Evaluation Period: JULY 1, 2009 TO DECEMBER 31, 2011					
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:																	
MSA 38940 (Port St Lucie- Ft Pierce FL)	60.47	15	38.46	0.00	13.33	66.67	20.00	0	1	0	0	0	- 1	3.58	17.57	57.55	21.31
MSA 42680 (Sebastian-Vero Beach FL)	11.76	8	20.51	0.00	0.00	75.00	25.00	0	0	0	0	0	0	0.00	16.49	61.66	21.84
Limited Review:																	
MD 22744 (Ft Lauderdale-Pompano-Deerfield FL)	0.00	1	0.00	0.00	0.00	0.00	0.00	0	1	0	0	- 1	0	3.57	26.43	43.13	26.88
MD 48424 (W Palm Bch-Boca Raton-Boynton Bch FL)	4.59	3	7.69	0.00	0.00	66.67	33.33	0	0	0	0	0	0	4.21	29.32	33.88	32.37
MSA 36740 Partial (Seminole and Orange Counties FL)	6.18	3	7.69	0.00	33.33	33.33	33.33	0	0	0	0	0	0	2.12	20.02	43.24	34.62
MSA 37340 (Palm Bay-Melbourne-Titusville FL)	3.06	2	5.13	0.00	0.00	50.00	50.00	0	0	0	0	0	0	1.34	19.21	51.27	28.17
Non-MSA Counties	13.94	8	20.51	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	12.18	87.76	0.06

Deposits as of June 30, 2011.