



PUBLIC DISCLOSURE

October 07, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Florida Capital Bank, National Association
Charter Number 20214

10151 Deerwood Park Boulevard, Building 300, Suite 110 Jacksonville, FL 32256

Office of the Comptroller of the Currency

8375 Dix Ellis Trail, Suite 403 Jacksonville, FL 32256-8273

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

Florida Capital Bank, N.A. (FCB) has a Satisfactory record of meeting community credit needs based on the following:

- FCB's loan-to-deposit ratio is reasonable when compared to banks of similar size and characteristics in or near the assessment areas (AAs). The loan-to-deposit ratio averages 73.35 percent.
- A substantial majority of FCB's loans are outside the bank's combined AAs. Approximately 4.04 percent of the number and 3.47 percent of the dollar volume of loans were to borrowers within the combined AAs.
- The lending performance to individuals of different income levels and to businesses of different sizes within the full scope AAs is reasonable.
- The geographic distribution of loans reflects a reasonable dispersion within the full scope AAs.
- FCB's community development performance demonstrates a reasonable responsiveness to the needs of the full scope AAs through community development loans, qualified investments, and community development services, as appropriate.

Scope of Examination

This Performance Evaluation of FCB assesses the bank's record of meeting the credit needs of the communities in which it operates. We evaluated FCB under the Intermediate Small Bank performance criteria, which include a Lending Test and a Community Development Test. The Lending Test evaluates a bank's record of helping to meet the credit needs of its AAs through its lending activities. The Community Development Test evaluates a bank's community development lending, qualified investments, and community development services. This evaluation covers the period from the date of the previous CRA Examination, October 6, 2009, through June 30, 2013.

- Lending Test conclusions are based on the lending performance of the bank's primary loan products. We evaluated small business and residential mortgage lending from January 1, 2010 through June 30, 2013. Prior to conducting this evaluation, we tested the accuracy of the bank's Home Mortgage Disclosure Act (HMDA) and small business data. We found the data to be substantially accurate; therefore, we used reported HMDA data for January 1, 2010, through June 30, 2013.

- Conclusions regarding the Community Development Test are based on investments, services, and loans completed in FCB's combined AAs, which meet the definition of community development. We conducted the Community Development Test using information from the previous CRA evaluation period, October 6, 2009, through October 7, 2013.
- Our analysis included a full-scope evaluation for the Jacksonville and Tampa/St. Petersburg Metropolitan Statistical Areas (MSAs) AAs. Approximately 50.00 percent of the bank's loans and 61.73 percent of deposits are within these AAs. The Jacksonville MSA AA contains two of the bank's nine offices, including the main office. The Tampa/St. Petersburg MSA contains four of the bank's offices. We performed limited-scope evaluations for the Daytona Beach, Volusia County (one branch), Gainesville, Alachua County (one branch), and Orlando, Orange County (one branch) MSA AAs.
- The review period covered two different U. S. Census periods 2000 and 2010. Therefore, the analysis for the Lending Test used demographic data from the 2000 Census for activity in 2010 and 2011, and demographic data from the 2010 Census for activity in 2012 and 2013.

Description of Institution

FCB is an intrastate bank located in Jacksonville, Florida (FL) and was chartered in 1985. FCB is a wholly owned subsidiary of Florida Capital Group, Inc. (FCG), a one-bank holding company headquartered in Jacksonville, FL. FCG reported assets of \$546.2 million as of June 30, 2013.

FCB has nine offices and operates nine automated teller machines (ATMs), one at each branch, in five AAs. Two locations, including the main banking office, are located in the Jacksonville, FL MSA AA. Four offices are located in the Tampa/St. Petersburg, FL MSA AA. In addition, one office is located in the Daytona Beach, FL MSA AA, one office is located in the Gainesville, FL MSA AA, and one office is located in the Orlando, FL MSA AA. All AAs consist of entire counties and contiguous census tracts (CTs) and do not arbitrarily exclude any low- or moderate-income geographies.

A "Satisfactory" rating under the Intermediate Small Bank criteria was assigned to the bank in the prior Public Evaluation dated October 6, 2009. Since that evaluation, FCB closed one branch in Boca Raton, FL on December 3, 2010, one branch in Orlando, FL on April 29, 2011, one branch in St. Petersburg, FL on July 15, 2011, and one branch in Fort Lauderdale, FL on December 2, 2011.

As of June 30, 2013, FCB had total assets of \$546.2 million with net loans and leases at 65.41 percent of this total. FCB's primary business is commercial lending. FCB also has a mortgage department which offers 15- and 30-year mortgages with conventional, FHA, VA, and USDA financing. See the following chart for additional information on the composition of the bank's loan portfolio as of June 30, 2013.

Loan Type	\$ (000)	%
Commercial	9,805	4.81
Commercial Real Estate	151,267	74.22
Residential Real Estate	41,406	20.31
Agricultural Real Estate	553	0.27
Other Consumer	789	0.39
Agricultural	0	0.00
Political Subdivisions	0	0.00
TOTAL	\$203,820	100%

Source: June 30, 2013 Florida Capital Bank Core System Trial Balance

FCB offers a wide range of traditional deposit and loan products. Branches are accessible to individuals located in the different areas of the communities they serve. Lobby and drive-up hours are set by location to meet customer needs. FCB has ATMs located at all nine branches to make customer accounts accessible. There are no “stand alone” ATMs. Customers may also access their accounts through the bank’s website at www.flcb.com. Online banking services include free bill pay, real time account balance information, loan payments, and funds transfer. The bank also offers 24-hour telephone banking. Telephone services include account balance information, last deposit information, transaction verification, and transfers between a single accountholder’s accounts. The bank also offers debt cards with additional access to their checking account for point of sale or ATM transactions.

FCB operates a wholesale mortgage division (Florida Capital Bank Mortgage) that originates residential real estate loans for sale in the secondary mortgage market, which allows the bank to offer affordable and flexible home mortgage products. During the evaluation period, the wholesale mortgage division originated/purchased 31,892 loans totaling approximately \$7.5 billion. It is important to note the bank does not use core deposits in funding the mortgages.

Affordable mortgage products available during the review period included Federal Housing Administration (FHA) and U.S. Department of Agriculture (USDA) loans. During the evaluation period, the wholesale mortgage division originated 8,082 FHA loans totaling approximately \$1.6 billion and 166 USDA loans totaling \$21.7 million. These mortgage programs target low- and moderate-income individuals and families by permitting higher debt-to-income and loan-to-value ratios. Loans originated under these programs to borrowers that are located in one of the bank’s AAs were included in the home purchase and home refinance Lending Test tables and analysis, and subsequently included in the overall evaluation of lending performance.

FCB is also a Small Business Administration (SBA) lender which allows the bank to address the lending needs of small businesses throughout the bank’s AAs. During the evaluation period, the bank originated six SBA loans totaling approximately \$1.8 million.

The bank does have financial and legal impediments that could restrict the bank's ability to meet the credit needs of the communities it serves. The bank's ability to lend has been impacted by the terms of an agreement with our agency.

Description of Full Scope Assessment Areas

FCB currently has branches in five AAs, all of which consist of counties in MSAs. The Jacksonville and Tampa/St. Petersburg MSA AAs will receive full scope reviews as they contain the highest number of the bank's offices, loans, and deposits. The Jacksonville MSA AA contains two of the bank's nine offices, including the main office and the Tampa/St. Petersburg MSA AA contains four of the bank's offices. Both AAs include whole counties which consist of contiguous CTs and do not exclude any low- or moderate-income geographies.

Jacksonville MSA AA

This AA consists of Duval and St. Johns Counties, Florida. The city of Jacksonville is the largest city in this AA. The main office and one branch are located in the Jacksonville MSA AA. The following tables provide a description of the Jacksonville MSA AA based on data from the 2000 Census and the 2010 Census:

Demographic and Economic Characteristics of Jacksonville MSA AA – 2000 Census Data	
<i>Population</i>	
Number of Families	237,493
Number of Households	353,492
<i>Geographies</i>	
Number of Census Tracts	169
% Low-Income Census Tracts	6.51%
% Moderate-Income Census Tracts	28.99%
% Middle-Income Census Tracts	46.15%
% Upper-Income Census Tracts	18.35%
<i>Median Family Income (MFI)</i>	
2000 MFI for AA	\$51,400
2010 HUD-Adjusted MFI	\$65,800
2011 HUD-Adjusted MFI	\$66,400
<i>Economic Indicators</i>	
Unemployment Rate – 2011 average	9.9%
2011 Median Housing Value	\$123,000
% of Families Below Poverty Level	8.59%

Source: 2000 Census data and HUD updated income data.

According to the 2000 Census, the AA includes 169 CTs with a total population of 902,014. The CTs consist of 11 low-, 49 moderate-, 78 middle-, and 31 upper-income tracts. The 2000 Census data reflects that 8.59 percent of the families in this AA are below the poverty level.

According to 2000 Census data, there are 387,786 housing units in this AA, of which 59.21 percent are owner-occupied, 31.91 percent are renter-occupied, and 8.88 percent are vacant. Approximately 20.28 percent of families in this AA are low-income. Moderate-income families approximate 18.59 percent, while middle- and upper-income families make up the remaining 61.13 percent. The median housing value is \$101,217 with the median age of housing stock at 25 years.

Demographic and Economic Characteristics of Jacksonville MSA AA – 2010 Census Data	
<i>Population</i>	
Number of Families	256,497
Number of Households	400,600
<i>Geographies</i>	
Number of Census Tracts with assigned designations	212
% Low-Income Census Tracts	8.02%
% Moderate-Income Census Tracts	25.94%
% Middle-Income Census Tracts	37.74%
% Upper-Income Census Tracts	28.30%
<i>Median Family Income (MFI)</i>	
2010 MFI for AA	\$65,800
2012 HUD-Adjusted MFI	\$67,300
2013 HUD-Adjusted MFI	\$63,200
<i>Economic Indicators</i>	
Unemployment Rate – August 2013	6.5%
2013 Median Housing Value	\$134,000
% of Families Below Poverty Level	9.59%

Source: 2010 Census data and HUD updated income data.

According to the 2010 Census, the AA includes 212 CTs with assigned designations and with a total population of 1,054,302. The CTs consist of 17 low-, 55 moderate-, 80 middle-, and 60 upper-income tracts. The 2010 Census data reflects that 9.59 percent of the families in this AA are below the poverty level.

According to 2010 Census data, there are 470,233 housing units in this AA, of which 55.84 percent are owner-occupied, 29.35 percent are renter-occupied, and 14.81 percent are vacant. Approximately 21.60 percent of families in this AA are low-income. Moderate-income families approximate 17.57 percent, while middle- and upper-income families make up the remaining 60.83 percent. The median housing value is \$212,021 with the median age of housing stock at 41 years.

The city of Jacksonville is the largest city by land mass in the country and the largest by total population in Florida. The entirety of Duval County encompasses Jacksonville. Three interstates; Interstates 10, 95, and 295, intersect in Jacksonville. Interstate 10 runs from Jacksonville to Santa Monica, CA. Interstate 95 begins in Miami, FL and connects to Canada through the Northeast United States. This system of highways has made Jacksonville a desirable city for the import, logistics, tourism, and shipping industries. Jacksonville is home to Jax Port, the third largest port in Florida and the second largest handler of vehicles in the United States. Jacksonville is also home to three military facilities, making the military the city's largest

employer. Other top employers include the Duval County Public School system, the City of Jacksonville, Bank of America, Mayo Clinic, and CSX Railroad. This AA was negatively impacted by the economic recession that began in 2009. The area’s unemployment rate peaked in July 2010 at 12 percent, but has since come down to 6.5 percent as of August 2013.

Competition for financial services in the AA is very strong. The June 30, 2013, FDIC Deposit Market Share Report for this AA shows \$45.5 billion of deposits divided among 35 financial institutions with a total of 255 offices. Two of the top three banks, Bank of America, N.A. and Wells Fargo Bank, N.A., are members of nation-wide organizations and have 84 offices (combined) in this AA, and hold over 54.43 percent of the AA’s deposits. The number two bank, based on deposit size, EverBank, gathers the majority of its deposits through internet activities rather than retail branch locations. FCB has two offices in this AA and holds \$172.0 million of AA deposits, which is approximately 0.38 percent of the deposit market share.

As part of this CRA examination, we referred to a community contact in the Jacksonville MSA AA to help ascertain the credit needs of the AA. The community contact noted that there are several opportunities to participate in community service activities including lending for affordable housing, both single family and rental, and small-dollar loans to small businesses. The contact also indicated that local banks are responsive to meeting the credit needs of the community.

Tampa/St. Petersburg MSA AA

This AA consists of Hillsborough, Pasco, and Pinellas Counties, Florida. The city of Tampa is largest city in the MSA. FCB has four full-service branches in this AA - Tampa (2), Pinellas Park (1), and Tarpon Springs (1). The following tables provide a description of the Tampa/St. Petersburg MSA AA based on data from the 2000 Census and the 2010 Census:

Demographic and Economic Characteristics of Tampa/St. Petersburg MSA AA – 2000 Census Data	
<i>Population</i>	
Number of Families	601,155
Number of Households	954,336
<i>Geographies</i>	
Number of Census Tracts	522
% Low-Income Census Tracts	3.07%
% Moderate-Income Census Tracts	24.52%
% Middle-Income Census Tracts	45.21%
% Upper-Income Census Tracts	27.20%
<i>Median Family Income (MFI)</i>	
2000 MFI for AA	\$47,500
2010 HUD-Adjusted MFI	\$59,400
2011 HUD-Adjusted MFI	\$55,700
<i>Economic Indicators</i>	
Unemployment Rate – average 2011	12.1%
2011 Median Housing Value	\$107,000
% of Families Below Poverty Level	7.88%

Source: 2000 Census data and HUD updated income data.

According to the 2000 Census, this AA includes 522 CTs with a total population of 2,265,195. The CTs consist of 16 low-, 128 moderate-, 236 middle-, and 142 upper-income tracts. The 2000 Census data reflects that 7.88 percent of the families in this AA are below the poverty level.

According to 2000 Census data, there are 1,081,252 housing units in this AA, of which 61.64 percent are owner-occupied, 26.59 percent are renter-occupied, and 11.78 percent are vacant. Approximately 18.63 percent of families in the AA are low-income. Moderate-income families approximate 18.71 percent, while middle- and upper-income families make up the remaining 62.66 percent. The median housing value is \$93,332 with the median age of housing stock at 25 years.

Demographic and Economic Characteristics of Tampa/St. Petersburg MSA AA – 2010 Census Data	
<i>Population</i>	
Number of Families	649,472
Number of Households	1,052,909
<i>Geographies</i>	
Number of Census Tracts	689
% Low-Income Census Tracts	4.79%
% Moderate-Income Census Tracts	25.69%
% Middle-Income Census Tracts	40.35%
% Upper-Income Census Tracts	29.17%
<i>Median Family Income (MFI)</i>	
2010 MFI for AA	\$59,400
2012 HUD-Adjusted MFI	\$56,400
2013 HUD-Adjusted MFI	\$56,800
<i>Economic Indicators</i>	
Unemployment Rate – July 2013	7.30%
2013 Median Housing Value	\$125,000
% of Families Below Poverty Level	9.47%

Source: 2010 Census data and HUD updated income data.

According to the 2010 Census, this AA includes 689 CTs with a total population of 2,610,465. The CTs consist of 33 low-, 177 moderate-, 278 middle-, and 201 upper-income tracts. The 2010 Census data reflects that 9.47 percent of the families in this AA are below the poverty level.

According to 2010 Census data, there are 1,253,526 housing units in this AA, of which 57.74 percent are owner-occupied, 26.25 percent are renter-occupied, and 16.00 percent are vacant. Approximately 20.56 percent of families in the AA are low-income. Moderate-income families approximate 18.19 percent, while middle- and upper-income families make up the remaining 61.25 percent. The median housing value is \$200,913 with the median age of housing stock at 47 years.

This AA is located along the Gulf Coast in central Florida. This AA is home to several professional sports teams including teams from the National Football League and Major League Baseball. The area is situated off Interstate 75 and Hillsborough Bay. This location has become the largest Florida port by tonnage and the 7th largest in the country. Interstate 75 connects South Florida to the Northern Midwest United States. Major employers in Tampa include Hillsborough School district, MacDill Air Force Base, the University of South Florida, Busch Gardens, and Publix Supermarkets. Tourism is also important to the Tampa economy. Currently, three cruise lines embark from Tampa, including Royal Caribbean, Holland America, and Carnival. The economic recession of 2009 raised the unemployment rate to 12.7 percent in July 2010. As of July 2013, the area's unemployment rate was 7.3 percent.

Competition for financial services in the AA is very strong. The June 30, 2013, FDIC Deposit Market Share Report for this AA shows \$61.6 billion of deposits divided among 63 financial institutions with a total of 745 offices. The top two banks, which are members of nation-wide organizations, Bank of America, N.A. and Wells Fargo Bank, N.A., have 178 offices (combined) in this AA and hold over 32.57 percent of AA deposits. FCB has four offices in this AA and holds \$132.2 million of the AA's deposits, which is approximately 0.21 percent of the deposit market share.

As part of this CRA examination, we referred to community contacts in the Tampa MSA AA to help ascertain the credit needs of the AA. The community contacts noted that there are several opportunities to participate in community service activities including lending for affordable housing, both single family and rental, and small-dollar loans to small businesses. The contacts also indicated that local banks are responsive to meeting the credit needs of the community.

Conclusions with Respect to Performance Tests

LENDING TEST

The bank's performance under the Lending Test is rated Satisfactory.

Loan-to-Deposit Ratio

FCB's loan-to-deposit ratio meets the standard for satisfactory performance given the bank's size, financial condition, and the credit needs of the combined AAs. This determination is based on the bank's quarterly average loan-to-deposit ratio of 73.35 percent from December 31, 2009, through June 30, 2013. During the evaluation period, FCB's loan-to-deposit ratio ranged from a low of 58.07 percent (March 2011) to a high of 88.14 percent (September 2010). The average loan-to-deposit ratio of similarly situated banks within the AAs for the same period was 77.68 percent. The quarterly average loan-to-deposit ratios for these similarly situated banks are below.

Loan-to-Deposit Ratios		
Institution	Total Assets \$ (000's) (As of 6/30/2013)	Average Loan-to-Deposit Ratio
Centerstate Bank of Florida, NA, Winter Haven	2,348,700	64.96%
Cnlbank, Orlando	1,280,486	78.96%
C1Bank, St. Petersburg	1,031,699	86.84%
Seaside National Bank & Trust, Orlando	872,779	78.33%
Old Florida National Bank, Orlando	798,566	77.85%
Florida Bank, Tampa	558,605	81.03%
Florida Capital Bank, NA, Jacksonville	546,193	73.35%
The Jacksonville Bank, Jacksonville	521,194	91.01%
Bay Cities Bank, Tampa	501,230	62.44%

Source: Institution Reports of Condition from December 2009 to June 2013

Lending in Assessment Areas

FCB's lending within the combined AAs does not meet the standards for satisfactory performance. Less than a majority of the bank's originated loans were within the combined AAs. In order to assess performance for this criterion, we reviewed 234 commercial and 31,892 home mortgage loans originated between January 1, 2010, and June 30, 2013. Our analysis determined that 4.04 percent of the number of loans and 3.47 percent of the dollar amount of loans overall were originated within the bank's combined AAs. The following table depicts the breakdown by loan category:

Lending in all Assessment Areas										
Loan Type	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Business	212	90.60	22	9.40	100.0	57,300	90.27	6,177	9.73	100.0
Home Mortgage	1,086	3.41	30,806	96.59	100.0	204,801	2.73	7,284,635	97.27	100.0
Totals	1,298	4.04	30,828	95.96	100.0	262,101	3.47	7,290,812	96.53	100.0

Source: Data reported under HMDA

Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The distribution of loans made to individuals and families of different income levels and businesses of different sizes meets the standard for satisfactory performance.

The following activity relates to activity from January 1, 2010 through December 31, 2011, for the two full scope AAs:

Jacksonville MSA AA

The distribution of loans originated to businesses with revenues less than \$1 million is lower than the demographic by both the number of loans and dollar amount of loans. The percentage of businesses within the AA that generate revenues less than \$1 million is 80.13 percent based on independent data provided by Dunn and Bradstreet. FCB originated 31.58 percent of its total small business loans to businesses with revenues less than \$1 million.

In addition, revenues are unknown for 16.57 percent of the businesses in this AA, which reduces the reliability of this analysis. The following table shows the distribution of commercial loans among businesses of different sizes in this AA.

Borrower Distribution of Business Loans in Jacksonville MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	80.13%	3.30%	16.57%	100%
% of Bank Loans in AA by #	31.58%	63.16%	5.26%	100%
% of Bank Loans in AA by \$	14.88%	83.56%	1.56%	100%

Source: Loan sample; Dunn and Bradstreet data

Residential loans to low-income borrowers are lower than the percentage of low-income families within this AA. However, the percentage of loans to moderate-income borrowers is higher than the level of moderate-income families in this AA. Approximately 20.28 percent of families are low-income, and 18.59 percent are moderate-income. Based upon the updated 2011 median family income for the area of \$66,400, low-income families in the AA earn less than \$33,200 per year. In addition, 8.59 percent of families in this AA are below poverty level. Based on 2000 Census data, the median housing cost was \$101,217. It is often difficult for low- and moderate-income individuals to qualify for mortgage loans at median housing values due to insufficient income levels and/or down payments.

The following table reflects the analysis of HMDA reportable loans for January 1, 2010 through December 30, 2011.

Borrower Distribution of Residential Real Estate Loans in Jacksonville MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	20.28	9.93	18.59	29.08	22.71	26.95	38.43	34.04
Home Improvement	20.28	0.00	18.59	00.00	22.71	00.00	38.43	00.00
Refinance	20.28	8.00	18.59	21.33	22.71	29.33	38.43	41.33
Total*	20.28	9.42	18.59	26.01	22.71	27.80	38.43	36.77

Source: 2010 and 2011 HMDA LARs and U.S. Census data. *3.57 percent of borrowers did not report income information.

Tampa/St. Petersburg MSA AA

The distribution of loans originated to businesses with revenues less than \$1 million is lower than the demographic by both the number of loans and dollar amount of loans. The percentage of businesses within the AA that generate revenues less than \$1 million is 81.83 percent based on independent data provided by Dunn and Bradstreet. FCB originated 31.03 percent of its total small business loans to businesses with revenues less than \$1 million.

In addition, revenues are unknown for 15.04 percent of the businesses in the AA, which reduces the reliability of this analysis. The following table shows the distribution of commercial loans among businesses of different sizes in this AA.

Borrower Distribution of Business Loans in Tampa/St. Petersburg MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	81.83%	3.13%	15.04%	100%
% of Bank Loans in AA by #	31.03%	65.52%	3.45%	100%
% of Bank Loans in AA by \$	22.58%	76.26%	1.16%	100%

Source: Loan sample; Dunn and Bradstreet data

Residential loans to low-income borrowers are lower than the percentage of low-income families within this AA. However, the percentage of loans to moderate-income borrowers is commensurate with the level of moderate-income families in this AA. Approximately 18.63 percent of families are low-income, and 18.71 percent are moderate-income. Based upon the updated 2011 median family income for the area of \$55,700, low-income families in the AA earn less than \$27,850 per year. In addition, 7.88 percent of families in this AA are below poverty level. Based on 2000 Census data, the median housing cost was \$93,332. It is often difficult for low- and moderate-income individuals to qualify for mortgage loans at median housing values due to insufficient income levels and/or down payments.

The following table reflects the analysis of HMDA reportable loans for January 1, 2010 through December 30, 2011.

Borrower Distribution of Residential Real Estate Loans in Tampa/St. Petersburg MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	18.63	3.85	18.71	11.54	21.88	19.23	40.79	65.38
Home Improvement	18.63	0.00	18.71	00.00	21.88	00.00	40.79	100.00
Refinance	18.63	4.76	18.71	17.46	21.88	15.87	40.79	61.90
Total*	18.63	4.26	18.71	15.96	21.88	17.02	40.79	62.76

Source: 2010 and 2011 HMDA LARs and U.S. Census data. *5.26 percent of borrowers did not report income information.

The following data relates to activity for 2012 and 2013, through June 30:

Jacksonville MSA AA

The distribution of loans originated to businesses with revenues less than \$1 million is lower than the demographic by both the number of loans and dollar amount of loans. The percentage of businesses within the AA that generate revenues less than \$1 million is 69.63 percent based on independent data provided by Dunn and Bradstreet. FCB originated 47.37 percent of its total small business loans to businesses with revenues less than \$1 million.

In addition, revenues are unknown for 27.87 percent of the businesses in the AA, which reduces the reliability of this analysis. The following table shows the distribution of commercial loans among businesses of different sizes in this AA.

Borrower Distribution of Business Loans in Jacksonville MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	69.63%	2.50%	27.87%	100%
% of Bank Loans in AA by #	47.37%	52.63%	0.00%	100%
% of Bank Loans in AA by \$	26.30%	73.70%	0.00%	100%

Source: Loan sample; Dunn and Bradstreet data

Residential loans to low-income borrowers are lower than the percentage of low-income families within this AA. However, the percentage of loans to moderate-income borrowers is commensurate with the level of moderate-income families in this AA. Approximately 21.60 percent of families are low-income, and 17.57 percent are moderate-income. Based upon the updated 2013 median family income for the area of \$63,200, low-income families in the AA earn less than \$31,600 per year. In addition, 9.59 percent of families in this AA are below poverty level. Based on 2010 Census data, the median housing cost was \$212,021. It is often difficult for low- and moderate-income individuals to qualify for mortgage loans at median housing values due to insufficient income levels and/or down payments.

The following table reflects the analysis of HMDA reportable loans for January 1, 2012 through June 30, 2013.

Borrower Distribution of Residential Real Estate Loans in Jacksonville MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	21.60	2.70	17.57	24.32	21.28	24.32	39.55	48.65
Home Improvement	21.60	0.00	17.57	00.00	21.28	00.00	39.55	00.00
Refinance	21.60	7.69	17.57	5.77	21.28	26.92	39.55	59.62
Total*	21.60	4.65	17.57	16.28	21.28	25.58	39.55	53.49

Source: 2012 and 2013 HMDA LARs and U.S. Census data. *2.33 percent of borrowers did not report income information.

Tampa/St. Petersburg MSA AA

The distribution of loans originated to businesses with revenues less than \$1 million is lower than the demographic by both the number of loans and dollar amount of loans. The percentage of businesses within the AA that generate revenues less than \$1 million is 67.88 percent based on independent data provided by Dunn and Bradstreet. FCB originated 30.77 percent of its total small business loans to businesses with revenues less than \$1 million.

In addition, revenues are unknown for 29.88 percent of the businesses in the AA, which reduces the reliability of this analysis. The following table shows the distribution of commercial loans among businesses of different sizes in this AA.

Borrower Distribution of Business Loans in Tampa/St. Petersburg MSA AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	67.88%	2.24%	29.88%	100%
% of Bank Loans in AA by #	30.77%	66.67%	2.56%	100%
% of Bank Loans in AA by \$	20.63%	78.98%	0.38%	100%

Source: Loan sample; Dunn and Bradstreet data

Residential loans to low-income borrowers are lower than the percentage of low-income families within this AA. The percentage of loans to moderate-income borrowers is also lower than the level of moderate-income families in the AA. Approximately 20.56 percent of families are low-income, and 18.19 percent are moderate-income. Based upon the updated 2013 median family income for the area of \$56,800, low-income families in the AA earn less than \$28,400 per year. In addition, 9.47 percent of families in this AA are below poverty level. Based on 2010 Census data, the median housing cost was \$74,413. It is often difficult for low- and moderate-income individuals to qualify for mortgage loans at median housing values due to insufficient income levels and/or down payments.

The following table reflects the analysis of HMDA reportable loans for January 1, 2012 through June 30, 2013.

Borrower Distribution of Residential Real Estate Loans in Tampa/St. Petersburg MSA AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	20.56	15.38	18.19	15.38	19.60	11.54	41.64	57.69
Home Improvement	20.56	00.00	18.19	00.00	19.60	00.00	41.64	00.00
Refinance	20.56	6.38	18.19	10.64	19.60	12.77	41.64	70.21
Total*	20.56	9.89	18.19	13.19	19.60	13.19	41.64	63.73

Source: 2012 and 2013 HMDA LARs and U.S. Census data. *19.78 percent of borrowers did not report income information.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the lending performance for borrowers of different income levels and businesses of different sizes in the Daytona Beach, Gainesville, and Orlando MSA AAs is consistent with the bank’s overall performance.

Geographic Distribution of Loans

FCB’s geographic loan distribution meets the standard for satisfactory performance. Small business and residential mortgage lending reflects a reasonable dispersion throughout the AA.

The following relates to activity from January 1, 2010 through December 31, 2011:

Jacksonville MSA AA

The geographic distribution of small business loans in low-income CTs is higher than the percentage of small businesses in these areas. The percentage of businesses located in low-income CTs is 4.35 percent, and the bank originated 5.26 percent of its small business loans in low-income CTs. The distribution of small businesses in moderate-income CTs is much higher than the percentage of small businesses in these areas. The following table summarizes the distribution of small business loans by CT income level.

Geographic Distribution of Loans to Businesses in Jacksonville MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	4.35	5.26	22.76	47.37	45.27	47.37	27.62	00.00

Source: Loan sample; U.S. Census data.

The percentage distribution of residential loans is somewhat lower than the percentage of owner-occupied housing units in low-income CTs. However, in the AA, only 2.52 percent or 15,754 owner-occupied housing units are located in low-income geographies. This results in limited opportunities to make mortgage loans in these geographies. The percentage distribution of mortgage loans is also lower than the percentage of owner-occupied housing units in moderate-income CTs.

The following table reflects the analysis of HMDA reportable loans for January 1, 2010 through December 30, 2011.

Geographic Distribution of Residential Real Estate Loans in Jacksonville MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner-Occupied Housing	% of Number of Loans	% of AA Owner-Occupied Housing	% of Number of Loans	% of AA Owner-Occupied Housing	% of Number of Loans	% of AA Owner-Occupied Housing	% of Number of Loans
Home Purchase	2.52	0.71	19.62	12.77	48.94	48.94	28.91	37.59
Home Improvement	2.52	0.00	19.62	00.00	48.94	00.00	28.91	00.00
Refinance	2.52	0.00	19.62	9.76	48.94	34.15	28.91	56.10
Total	2.52	0.45	19.62	11.66	48.94	43.50	28.91	44.39

Source: 2010 and 2011 HMDA LARs and U.S. Census data.

Tampa/St. Petersburg MSA AA

The geographic distribution of sampled small business loans in low-income CTs is lower than the percentage of small businesses in these areas. The percentage of businesses located in low-income CTs is 1.58 percent, and our loan sample reflected that 0.00 percent of small business loans were located in low-income CTs. However, the distribution of small businesses in moderate-income CTs is somewhat higher the percentage of small businesses in these areas. The following table summarizes the distribution of small business loans by CT income level.

Geographic Distribution of Loans to Businesses in Tampa/St. Petersburg MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	1.58	0.00	21.41	24.14	42.16	37.93	34.85	37.93

Source: Loan sample; U.S. Census data.

The percentage distribution of residential loans is lower than the percentage of owner-occupied housing units in low-income CTs. However, in the AA, only 0.82 percent or 24,803 owner-occupied housing units are located in low-income geographies. This results in limited opportunities to make mortgage loans in these geographies. The percentage distribution of mortgage loans is also lower than the percentage of owner-occupied housing units in moderate-income CTs.

The following table reflects the analysis of HMDA reportable loans for January 1, 2010 through December 30, 2011.

Geographic Distribution of Residential Real Estate Loans in Tampa/St. Petersburg MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner-Occupied Housing	% of Number of Loans	% of AA Owner-Occupied Housing	% of Number of Loans	% of AA Owner-Occupied Housing	% of Number of Loans	% of AA Owner-Occupied Housing	% of Number of Loans
Home Purchase	0.82	0.00	20.14	3.85	47.94	57.69	31.10	38.46
Home Improvement	0.82	0.00	20.14	0.00	47.94	0.00	31.10	100.00
Refinance	0.82	0.00	20.14	10.45	47.94	28.36	31.10	61.19
Total	0.82	0.00	20.14	8.51	47.94	36.17	31.10	55.32

Source: 2010 and 2011 HMDA LARs and U.S. Census data.

The following relates to activity from January 1, 2012 through June 30, 2013:

Jacksonville MSA AA

The geographic distribution of sampled small business loans in low-income CTs is lower than the percentage of small businesses in these areas. The percentage of businesses located in low-income CTs is 4.70 percent, and our loan sample reflected that 0.00 percent of small business loans were located in low-income CTs. However, the distribution of small businesses in moderate-income CTs is higher than the percentage of small businesses in these areas. The following table summarizes the distribution of small business loans by CT income level.

Geographic Distribution of Loans to Businesses in Jacksonville MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	4.70	0.00	32.35	40.00	43.85	50.00	19.10	10.00

Source: Loan sample; U.S. Census data.

The percentage distribution of residential loans is lower than the percentage of owner-occupied housing units in low-income CTs. However, in the AA, only 3.77 percent or 29,546 owner-occupied housing units are located in low-income geographies. This results in limited opportunities to make mortgage loans in these geographies. The percentage distribution of mortgage loans is also lower than the percentage of owner-occupied housing units in moderate-income CTs.

The following table reflects the analysis of HMDA reportable loans for January 1, 2012 through June 30, 2013.

Geographic Distribution of Residential Real Estate Loans in Jacksonville MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner-Occupied Housing	% of Number of Loans	% of AA Owner-Occupied Housing	% of Number of Loans	% of AA Owner-Occupied Housing	% of Number of Loans	% of AA Owner-Occupied Housing	% of Number of Loans
Home Purchase	3.77	0.00	18.43	6.76	40.95	48.65	36.85	44.59
Home Improvement	3.77	0.00	18.43	0.00	40.95	00.00	36.85	00.00
Refinance	3.77	0.00	18.43	3.64	40.95	38.18	36.85	58.18
Total	3.77	0.00	18.43	5.43	40.95	44.19	36.85	50.38

Source: 2012 and 2013 HMDA LARs and U.S. Census data.

Tampa/St. Petersburg MSA AA

The geographic distribution of sampled small business loans in low-income CTs is slightly higher than the percentage of small businesses in these areas. The percentage of businesses located in low-income CTs is 1.73 percent, and our loan sample reflected that 2.28 percent of small business loans were located in low-income CTs. The distribution of sampled loans to small businesses in moderate-income CTs is lower than the percentage of small businesses in these areas. The following table summarizes the distribution of small business loans by CT income level.

Geographic Distribution of Loans to Businesses in Tampa/St. Petersburg MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Business Loans	1.73	2.28	19.99	11.36	46.20	50.00	32.08	36.36

Source: Loan sample; U.S. Census data.

The percentage distribution of residential loans is commensurate with the percentage of owner-occupied housing units in low-income CTs. In the AA, only 1.93 percent or 44,609 owner-occupied housing units are located in low-income geographies. This results in limited opportunities to make mortgage loans in these geographies. The percentage distribution of mortgage loans is lower than the percentage of owner-occupied housing units in moderate-income CTs.

The following table reflects the analysis of HMDA reportable loans for January 1, 2012 through June 30, 2013.

Geographic Distribution of Residential Real Estate Loans in Tampa/St. Petersburg MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner-Occupied Housing	% of Number of Loans	% of AA Owner-Occupied Housing	% of Number of Loans	% of AA Owner-Occupied Housing	% of Number of Loans	% of AA Owner-Occupied Housing	% of Number of Loans
Home Purchase	1.93	0.00	21.38	10.26	42.13	41.03	34.56	48.72
Home Improvement	1.93	0.00	21.38	00.00	42.13	00.00	34.56	00.00
Refinance	1.93	1.92	21.38	9.62	42.13	23.08	34.56	65.38
Total	1.93	1.10	21.38	9.89	42.13	30.77	34.56	58.24

Source: 2012 and 2013 HMDA LARs and U.S. Census data.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the lending performance for loan distribution of small business loans and residential mortgage loans in different geographies in the Daytona Beach, Gainesville, and Orlando MSA AAs is consistent with the bank's overall performance.

Responses to Complaints

There have been no consumer complaints relating to the bank's CRA performance during the evaluation period, and this has a neutral impact on the bank's overall performance.

COMMUNITY DEVELOPMENT TEST

FCB's performance under the Community Development Test is rated Satisfactory.

The bank's community development performance reflects a reasonable responsiveness to community development needs within the combined AAs. The bank has conducted community development activities through a mix of loans, investments, and services. The availability of bank products has a positive impact on the overall community development rating. The branch distribution is reasonable. More detail on the level of activity within each of the three components of the Community Development Test is provided below, along with the regulatory definition of community development.

According to the definition found in 12 CFR 25, community development means:

- Affordable 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 or have gross annual revenues of \$1 million or less; or
- Activities that revitalize or stabilize:
 - low- or moderate-income geographies;
 - designated disaster areas; or
 - distressed or underserved non-metropolitan middle-income geographies.

Number and Amount of Community Development Loans

FCB originated ten community development loans totaling approximately \$744,000 during the evaluation period. FCB's performance in this area, with consideration given to the available opportunities, reflects reasonable responsiveness to the communities' needs.

FCB did not originate any community development loans in the Jacksonville MSA AA during this review period.

In the Tampa MSA AA, FCB originated seven loans totaling approximately \$268,000. The proceeds were used for refinances, renovations, and to purchase apartment complexes that provide affordable housing to low- and moderate-income individuals.

In addition, in the Gainesville MSA AA, FCB originated three loans totaling approximately \$476,000. The proceeds were used for refinances, renovations, and to purchase apartment complexes that provide affordable housing to low- and moderate-income individuals.

Further, FCB originated one loan totaling approximately \$13,000 in a broader state-wide area between the Gainesville MSA AA and the Orlando MSA AA where the proceeds were used for affordable housing for low- and moderate-income individuals.

Number and Amount of Qualified Investments

During this evaluation period, FCB's qualified investments, including donations, totaled approximately \$2,885.6 million. The level of investments reflects adequate responsiveness to the communities' needs. FCB's qualified investments in the Jacksonville MSA AA included donations to one organization totaling \$11,400 and an investment in a mortgage-backed security. Of the 22 underlying mortgages in the security, five were secured by property located in the Jacksonville MSA AA with original balances totaling \$772,000. All five borrowers were either low- or moderate-income.

Qualified investments in the Tampa MSA AA included an investment in the same mortgage-backed security reference above. Of the 22 underlying mortgages, seven were secured by property located in the Tampa MSA AA with original balances totaling \$813,000. All seven borrowers were either low- or moderate-income.

In addition, qualified investments in the Gainesville and Orlando MSA AAs included an investment in the same mortgage-backed security reference above. Of the 22 underlying mortgages, one was secured by property located in the Gainesville MSA AA with an original balance totaling \$103,000 and five were secured by property located in the Orlando MSA AA with original balances totaling \$719,000. The borrowers were either low- or moderate-income.

Further, the remaining four underlying mortgages mortgage-backed security discussed above were secured by property located in Broward (3) and Palm Beach (1) Counties, Florida, with original balances totaling \$361,000 and \$146,000, respectively. The borrowers were either low- or moderate-income.

Extent to Which the Bank Provides Community Development Services

FCB’s community development services include the bank's products, services, and branch locations that may provide assistance or community services to low- or moderate-income individuals. In addition to their full-service branch and ATM locations, FCB also offers Internet banking and telephone banking. Branch and ATM delivery systems include nine full-service branch locations and nine ATMs. FCB has two branches, or 22.22 percent of the bank's full-service locations, located in moderate-income CTs. The table below provides a summary of FCB’s branch and ATM distribution.

Distribution of Bank Offices and ATMs by Census Tract in Combined AAs						
Census Tract Income Level	Tracts in AA		Full-Service Offices		Automated Teller Machines*	
	#	%	#	%	#	%
Low	72	5.65%	0	0.00%	0	0.00%
Moderate	336	26.33%	2	22.22%	2	22.22%
Middle	501	39.26%	3	33.33%	3	33.33%
Upper	367	28.76%	4	44.45%	4	44.44%
Total	1,276	100.00%	9	100.00%	9**	100.00%

Source: 2010 U.S. Census Data; *Four of the nine ATMs accept deposits; **All ATMs are contiguous to banking locations.

FCB employees provided a reasonable level of community development services by participating in a variety of organizations that benefit low- to moderate-income individuals, promote economic development, and provide affordable housing. Bank employees hold leadership positions in many organizations, including board and committee memberships of CD organizations that address needs including affordable housing and small business development. During the evaluation period, eight bank employees provided their financial services expertise to ten different community development organizations within the Daytona Beach, Gainesville,

Jacksonville, and Tampa AAs. Examples of FCB’s community development services are listed below.

- Take Stock in Children, Daytona Beach – provide financial and technical expertise by serving on the Leadership Council and as Board Member. The organization provides scholarships to low-income students.
- Futures, Inc., Daytona Beach – provide financial expertise and technical expertise by serving as Board Member. The organization provides assistance for low-income students.
- United Way of Volusia County, Daytona Beach – provide financial and technical expertise by serving on the Allocations Committee.
- United Way of Alachua County, Gainesville – provide financial and technical expertise by serving on the Allocations Committee.
- Neighborhood Housing Development, Gainesville – provide financial and technical expertise by as a Board member.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance in the Daytona Beach, Gainesville, and Orlando MSA AAs is consistent with the bank’s overall “Satisfactory” performance under the Community Development Test.

One branch in the Daytona Beach MSA AA is located in a moderate-income CT.

In addition, the Gainesville branch is located in a middle-income CT and the Orlando branch is located in an upper-income CT.

Banking services are consistent with the areas receiving full-scope reviews. Branch employees are involved in community development services in the Daytona Beach and Gainesville MSA AAs.

Responsiveness to Community Development Needs

Based upon FCB’s overall record within the combined AA, a rating of Satisfactory was assigned for the Community Development Test. The rating was based upon FCB’s reasonable responsiveness in the level of community development lending and services and level of community development investments during the evaluation period.

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.