



PUBLIC DISCLOSURE

June 08, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Federal Bank
Charter Number: **706707**

4705 US Highway 90 West
Lake City, FL 32055

Office of the Comptroller of the Currency

4042 Park Oaks Blvd
Suite 240
Tampa, FL 33610

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

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Overall CRA Rating

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

The following table indicates the performance level of **First Federal Bank (FFB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	(First Federal Bank) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are not addressed in this evaluation. The bank's qualifying activities will be considered in the subsequent evaluation.

The major factors that support this rating include:

- The Lending Test rating is based on the good level of geographic and borrower distribution of lending activity and good community development lending.
- The Investment Test rating is based on the good level of qualified investments that exhibited good responsiveness to credit and community services and economic development needs.
- The Service Test rating is based on the good level of Retail Banking services and positive contribution of community services.

Lending in Assessment Area

FFB lending in the assessment area (AAs) needs improvement. A small percentage of the bank's loans are in its assessment areas. The bank originated and purchased 15.33 percent of its total number loans and 13.06 percent of the dollar amount of loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The bank's lending activity inside the assessment areas is greatly impacted by the acquisition of QRL Financial Services in 2011 and CBC National Bank Mortgage in 2018, which are mortgage banking operations outside of the bank's AAs.

Table D -Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	2,356	9.93	21,363	90.07	23,719	476,001	8.70	4,996,974	91.30	5,472,975
Small Business	1,547	88.65	198	11.35	1,745	282,354	84.97	49,932	15.03	332,286
Total	3,903	15.33	21,561	84.67	25,464	758,355	13.06	5,046,906	86.94	5,805,261

Description of Institution

FFB is an interstate federally-chartered savings association headquartered in Lake City, Florida. FFB is a full-service bank that operates branches in North, Central, and Northwest Florida, as well as in southeastern South Carolina. The bank is a wholly-owned subsidiary of First Federal Bancorp MHC, a mutual holding company. There were no CRA related activities from bank subsidiaries to consider for this evaluation. FFB's performance was rated "Satisfactory" at its last evaluation dated May 1, 2017.

The bank has \$2.2 billion in total assets and \$1.8 billion in total deposits as of December 31, 2019. The bank's primary market area is the central and northern areas of Florida where the Bank has a majority of its deposits and operates 23 branches. The bank has 93.19 percent of its deposits in the branches in Florida. The bank operates in 12 counties in Florida and one county in South Carolina. Branches are located in five Metropolitan Statistical Areas (MSAs), and a seven county non-MSA in Florida. Within Florida, the seven County non-MSA is the Bank's primary market area with 71.40 percent of its deposits and 13 banking offices. Within South Carolina, the bank operates in the Hilton Head-Bluffton-Beaufort-SC MSA with 6.80 percent of its deposits and two banking offices.

In 2018, FFB acquired CBC National Bank (CBC), a federally-chartered financial institution headquartered in Fernandina Beach, Florida. CBC National Bank Mortgage (CBC Mortgage) continues as a mortgage banking division with locations in Florida, Georgia, Illinois, North Carolina, Ohio, South Carolina, and Tennessee. The merger significantly expanded the Bank's mortgage lending capacity. Additionally, in 2018, the bank purchased the rights to SBA Works and made it a division of the bank. SBA Works aids small businesses and other banks in navigating the Small Business Administration (SBA) program and obtaining SBA loans. SBA Works is an online resource and that is handled through the banks retail branch network. Prior to this evaluation period the bank purchased QRL Financial Services in 2011, which is also a mortgage banking operation.

During the evaluation period, FFB faced significant challenges in its efforts to meet the credit needs in the AAs. There is significant competition in the AAs with many large national and regional financial institutions. Online institutions also have a significant presence. The limited supply of available housing for Low to Moderate (LMI) individuals in the AAs makes it challenging to make residential home loans in the AAs. The bank's primary business strategy is to be a residential mortgage lender that sells a substantial portion of its residential mortgages on the secondary market. A significant majority of the bank's mortgage loans are originated via its mortgage banking divisions, which operate primarily outside of the bank's AAs. The residential real estate portfolio totals 61.83 percent of total loans as of December 31, 2019.

The bank had the following branch network during the evaluation period:

Florida

- Non-MSA Counties -Columbia, Hamilton, Holmes, Jackson, Lafayette, Suwannee, Washington
 - 13 branches and 15 ATMs
- Jacksonville MSA- 27620 - Only Baker and Nassau counties
 - Four branches and five ATMs
- Panama City MSA – 37460 – Only Bay county
 - One branch and one ATM
- Gainesville MSA - 23540 – Only Alachua county
 - Two branches and two ATMs
- Ocala MSA - 36100
 - Three branches with three ATMs

South Carolina

- Hilton Head Island-Bluffton-Beaufort MSA 25940 – Only Beaufort county
 - Two branches and two ATMs

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, and CD loans, as reported under the CRA. We also evaluated CRA qualified investments and CD services.

The evaluation period for the Lending Test and Community Development (CD) loans for the state of Florida is January 1, 2017 through December 31, 2019. The branches in the state of South Carolina were acquired in April of 2019. Therefore, the evaluation period for the Lending Test and CD loans for South Carolina is April 2, 2019 through December 31, 2019. For the Investment Test and Service Test for the state of Florida, the evaluation period is May 1, 2017 through December 31, 2019 and for the state of South Carolina the evaluation period is April 2, 2019 through December 31, 2019. Our conclusions related to CD loans, qualified investments including donations, and CD services were based on the number and dollar amounts made during the evaluation period. In addition, we considered the level of innovation, complexity, responsiveness to community credit needs and the degree to which these instruments are not routinely provided by private investors.

Data Integrity

We performed a Community Reinvestment Act (CRA) Data Verification Examination that began on November 18, 2019. The purpose was to determine the accuracy of data that examiners use in evaluating the bank's performance under the CRA. As a Large Bank for CRA evaluation purposes, the bank is subject to the reporting of Home Mortgage Disclosure Act (HMDA) data; small business loan data and community development loan data. Additionally, we validated the bank's process for identifying community development loans, investments and services. We concluded the bank's CRA-related data was reliable for use in our planned CRA evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, Bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, Bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

First Federal Bank has five AAs in Florida and one in South Carolina. In Florida, the five AAs are comprised of four MSAs (portions of the MSAs) and one Non-MSA comprised of seven counties. In South Carolina, the one AA is a portion of an MSA comprised of one county. For our full-scope reviews in Florida, we selected the counties located in the Jacksonville MSA and the Non-MSA counties. For South Carolina, a portion of the Hilton Head Island-Bluffton-Beaufort MSA received a full-scope review.

We selected the full-scope AAs after considering the number of originated and purchased loans in each AA, the volume of deposits in each AA, the number of branch offices in each AA, and the length of time branch offices have operated in the respective markets. The full-scope AAs represent 89 percent of deposits and 90 percent of the total number of loans reported during the evaluation period. In addition, 19 of the 25 banking offices are in these three full-scope AAs. Refer to Appendix A for additional information.

For this evaluation period, the limited-scope AAs were comprised of counties located in the Panama City MSA, Gainesville MSA, and Ocala MSA. There were no limited-scope AAs in South Carolina.

Ratings

The bank's overall rating is a blend of the state ratings. A significant majority of the loan and CD activity were in the Florida AAs and are therefore weighed more heavily than the South Carolina AA.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State Rating

CRA rating for the State of Florida: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending activity reflects a good responsiveness to meeting the credit needs of the Bank's assessment area, given performance context.
- The bank's AAs concentration needs to improve given the small percentage of loans made in the AAs.
- The geographic distribution of loans is good and reflects a reasonable dispersion throughout the assessment area.
- The bank's performance regarding community development activities, including community development loans, qualified investments, and community development services, demonstrates good responsiveness to the needs of its community, given the level of opportunities in the assessment areas.
- Retail delivery systems are accessible to low- and moderate-income (LMI) geographies.

Description of Institution's Operations in Florida

FFB operates 23 branches and 26 ATMs in the state of Florida. There are 13 branches in the non-MSA AA which includes Columbia, Hamilton, Holmes, Jackson, Lafayette, Suwannee, and Washington counties. There are four branches in the Jacksonville MSA, one branch in the Panama City MSA, two branches in the Gainesville MSA, and three branches in the Ocala MSA. A substantial majority of the Bank's deposits are from the Florida branches representing about 93.19 percent of the Bank's total deposits. FFB has a presence in the north, northwestern, and central parts of the state and is ranked 40th out of 205 institutions with a deposit market share of 0.25 percent based on FDIC market share information as of June 30, 2019.

Non-MSA AA

The Non-MSA AA consists of seven, non-contiguous counties including all of Columbia, Hamilton, Holmes, Jackson, Lafayette, Suwannee, and Washington Counties. This AA represents 46 census tracts with income designations as follows: four moderate-income tracts, 36 middle-income tracts, and six upper-income tracts. These counties do not have any low-income tracts. The AA includes geographies where the institution has thirteen branch offices, each with an ATM, as well as two stand-alone ATM locations. This AA represents 71.40 percent of all deposits allocated to Florida. FFB is ranked first overall in deposit-taking in the AA with a 36.80 percent deposit market share. There are 15 financial institutions in the AA operating 46 offices, excluding credit unions. The largest financial institutions in the AA are Wells Fargo N.A., TD Bank, N.A., and SunTrust Bank.

The following tables depict the demographic information for the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: First Fed FL - Non MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	0.0	8.7	78.3	13.0	0.0
Population by Geography	227,761	0.0	6.9	80.4	12.6	0.0
Housing Units by Geography	96,469	0.0	8.0	80.7	11.3	0.0
Owner-Occupied Units by Geography	56,708	0.0	7.5	80.0	12.5	0.0
Occupied Rental Units by Geography	21,213	0.0	9.9	80.6	9.5	0.0
Vacant Units by Geography	18,548	0.0	7.3	82.9	9.8	0.0
Businesses by Geography	16,314	0.0	6.8	80.0	13.2	0.0
Farms by Geography	1,245	0.0	5.5	82.0	12.5	0.0
Family Distribution by Income Level	51,789	23.1	16.8	19.1	41.0	0.0
Household Distribution by Income Level	77,921	24.6	16.3	17.0	42.1	0.0
Median Family Income Non-MSAs - FL		\$46,899	Median Housing Value			\$95,052
			Median Gross Rent			\$687
			Families Below Poverty Level			18.0%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Community contacts indicate that affordable housing is a critical need in the AA as well as capital for small businesses. The AA was severely impacted by the housing crisis that began in 2006 and 2007 leading to the national recession that ended in 2009. Recovery was slow, but for the past ten years, employment has improved, as well as home sales. The poverty level for the AA is high with 18 percent of the families living below the poverty level. The 2015 American Community Survey (ACS) Census estimates the median value of owner-occupied housing units in the AA is \$95,052 with gross rents at \$687, which may be out of reach for individuals below the poverty line. The rents are also high for rental properties in the AA. We utilized one community contact for this assessment area with a focus on education. They provided no information which negatively impacted the bank's evaluation.

The 2015 ACS Census estimated median family income for the AA at \$46,899. Considering the median family income and the high poverty level in the AA, LMI families may have difficulty with affording mortgage payments without subsidies given the high housing costs and added costs of insurance and taxes. LMI renters, particularly low-income, also need rental subsidies to assist with rental payments. According to the 2015 ACS Census, 11 percent of households spend more than 30 percent of their income for rent payments.

The banking environment in the AA is very competitive for loans, deposits, and investments, as well as CRA CD opportunities. There are several branches of nationwide and regional banks, local

community banks, mortgage companies, credit unions, and other nonbank financial service providers. Investment opportunities are highly competitive with banks purchasing investments to support affordable housing for LMI individuals/geographies and small business lending. Many community banks tend to purchase mortgage backed securities with home mortgages to LMI people or loans in LMI geographies, affordable housing multifamily properties, or Small Business Administration loan pools in their AAs. The opportunity to make donations/grants to qualifying organizations that have missions that support the CRA CD purpose are available. CD lending opportunities are available in the AA including opportunities to partner with nonprofit organizations that have a CD mission or purpose.

Jacksonville MSA AA

The Jacksonville AA includes Baker and Nassau counties, which are in the Jacksonville MSA. The bank has four branches and five ATMs located in Baker and Nassau counties. This AA has no low-income tracts and three moderate-income tracts. None of the bank's branches are in moderate census tracts. FFB reported \$348 million in deposits in the Jacksonville MSA as of June 30, 2019. The Bank is ranked first overall in deposit-taking in the MSA with a 24.41 percent deposit market share. There are 12 banks in the AA operating 20 offices, excluding credit unions. Wells Fargo Bank, N.A. and Bank of America, are the largest financial institutions in the AA.

The Jacksonville AA has a population of 103,015 according to 2010 Census figures. As reported by Moody's Analytics the four largest employers are: Naval Air Station Jacksonville, Baptist Health, Naval Station Mayport, and Bank of America. Jacksonville is the principal city and the surrounding counties are part of the greater metropolitan area. The percentage of renters with rent costs more than 30 percent of their income grew from 34 percent based on the 2000 Census to 48 percent based on the 2010 Census. According to the 2010 Census, low- and moderate-income geographies represent 14 percent and 31 percent of the total number of households below the poverty level, respectively. These households would have difficulty qualifying for home loans. These factors all indicate a need for affordable housing options.

The AA has experienced economic recovery during the evaluation period as evidenced by the declining trend in the unemployment rate. According to the U.S. Department of Labor, Bureau of Labor Statistics information, the January 2017 unemployment rate for Nassau and Baker Counties was 4.7 and 5 percent, respectively. Unemployment rates in Nassau and Baker Counties improved to 2.5 and 2.6 percent respectively, by December 2019. Similarly, the AA has experienced an improving housing market over the evaluation period as home values increased following the last economic recession. According to data from the Florida Association of Realtors, as of January 2017, the median sales prices of a home in the Jacksonville MSA was \$197,000 compared to December 2019 when the median sales price was \$259,945. While positive overall, price increases make it more difficult for potential homebuyers with LMI incomes to enter into the market. Community contacts indicate that affordable housing is a critical need in the AA. We utilized two community contacts for this AA one with a community development focus based on affordable housing and the other being a grass roots community based mission organized through a church. They provided no information which negatively impacted the bank's evaluation.

The 2015 ACS Census estimated a median family income for the AA at \$64,042. Considering the median family income and the high poverty level in the AA, LMI families may have difficulty with affording mortgage payments without subsidies given the high housing costs and added costs of insurance and taxes. LMI renters, may also need rental subsidies to assist with rental payments. According to the 2015 ACS Census, 8.71 percent of households spend more than 30 percent of their income for rent payments.

The following table depicts the demographic information for the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: First Fed FL - Jacksonville						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.0	17.6	64.7	11.8	5.9
Population by Geography	103,015	0.0	20.3	72.0	7.7	0.0
Housing Units by Geography	45,315	0.0	19.4	67.1	13.5	0.0
Owner-Occupied Units by Geography	27,981	0.0	18.8	71.1	10.1	0.0
Occupied Rental Units by Geography	8,530	0.0	24.7	65.8	9.5	0.0
Vacant Units by Geography	8,804	0.0	16.2	55.9	27.9	0.0
Businesses by Geography	9,789	0.0	21.4	65.1	13.5	0.0
Farms by Geography	448	0.0	16.7	74.3	8.9	0.0
Family Distribution by Income Level	26,471	20.4	20.3	19.5	39.8	0.0
Household Distribution by Income Level	36,511	21.4	16.4	19.4	42.7	0.0
Median Family Income MSA - 27260 Jacksonville, FL MSA		\$64,042	Median Housing Value			\$214,823
			Median Gross Rent			\$1,033
			Families Below Poverty Level			9.9%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Scope of Evaluation in Florida

This Performance Evaluation is an assessment of FFB's ability to meet the credit needs of its communities. The bank was evaluated using the procedures for large banks. These procedures include tests for Lending, Investments, and Services. The bank's primary loan products over the evaluation period were home mortgage and small business loans. For purposes of this evaluation, we gave more weight to the bank's home lending as it makes up a significant majority of the bank's lending activity when considering the number and dollar amount of loans. Small business lending was also considered. FFB's performance for the lending test is based on an assessment of its home mortgage, small business and CD activities. We conducted a full-scope review of the seven county non-MSA AA and the Jacksonville MSA AA given the high percentage of originated/purchased loans, deposits and volume of census tracts in those assessment areas. Ratings are primarily based on the results in the full-scope assessment areas with consideration of performance in the limited-scope areas. Refer to the tables in appendix A for more information.

The evaluation period for the Lending Test and CD loans is January 1, 2017 through December 31, 2019. For the Investment Test and Service Test, the evaluation period is May 1, 2017 through December 31, 2019. Our conclusions related to CD loans, qualified investments including donations, and CD services were based on the number and dollar amounts made during the evaluation period. In

addition, we considered the level of innovation, complexity, responsiveness to community credit needs and the degree to which these instruments are not routinely provided by private investors.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The bank's performance under the Lending Test in the State of Florida is rated High Satisfactory.

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review in the non-MSA AA and the Jacksonville MSA AA, the bank's performance is good. Lending activity in the AAs that received a full-scope review reflects good responsiveness to the assessment area credit needs given competition from other lenders in the counties.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full Review							
Non-MSA	1,072	1,022	219	12	2,325	52.16%	76.61%
Jacksonville	621	358	19	7	1,005	27.48%	10.53%
Limited Review							
Panama City	219	71	0	2	292	6.55%	3.31%
Gainesville	139	20	0	1	160	3.59%	2.90%
Ocala	301	149	5	1	456	10.30%	6.65%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Percentages rounded up.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Full Review							
Non-MSA	\$158,104	\$202,983	\$28,676	\$26,587	\$416,350	49.93%	76.61%
Jacksonville	\$145,854	\$69,075	\$2,266	\$5,192	\$222,387	26.67%	10.53%
Limited Review							
Panama City	\$46,953	\$18,207	\$0	\$5,064	\$70,224	8.42%	3.31%
Gainesville	\$28,364	\$4,983	\$0	\$1,250	\$34,597	4.15%	2.90%
Ocala	\$52,493	\$35,589	\$991	\$1,260	\$90,333	10.83%	6.65%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only. Percentages rounded up.

Non-MSA AA

Based on FDIC Deposit Market Share data as of June 30, 2019, the bank ranked first in deposits with 36.80 percent market share in the AA. Based on 2018 Home Mortgage Disclosure Act (HMDA) peer mortgage data, the bank ranked second out of 27 HMDA reporters with 11.46 percent of the market share for home mortgage loans in the AA. FFB's larger share of deposits, but smaller share of mortgage lending, is attributed to several factors. Mortgage lending in the AA is widely dispersed among lenders. The Bank is competing against large national banks, as well as local banks that focus on mortgage lending, and private and online lending companies. Additionally, the Bank's overall strategy results in significant mortgage lending outside its AAs. Quicken Loans, 21st Mortgage, and Nations Lending Corp. ranked second, third, and fourth, respectively. Large national banks originated the greatest number of business loans, often in the form of business credit cards. Top competitors in small business lending include Ameris Bank, American Express, Bank of America, Regions Bank, and Wells Fargo, N.A.

Jacksonville MSA AA

Based on FDIC Deposit Market Share data as of June 30, 2019, the bank ranked first in deposits with 24.41 percent market share in the AA. Based on 2018 Home Mortgage Disclosure Act (HMDA) peer mortgage data, the bank ranked fourth out of 299 HMDA reporters with 4.78 percent of the market share for mortgage lending in the AA. FFB's larger share of deposits, but smaller share of mortgage lending, is attributed to the number of lenders in the market and the availability of credit online. Online lender Prime Lending ranked first with 8.8 percent of the market share.

For small business lending in the AA, FFB ranked first out of 71 loan data reporters with 41.14 percent market share. Large national banks originated most of the number of business loans. Top competitors in small business lending include Wells Fargo Bank, N.A., Fidelity Bank, and Bank of America. For small farm lending in the AA, FFB ranks second out of nine loan data reporters with 54.05% market share.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA(s).

Non-MSA AA

Home Mortgage Loans

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of home mortgage loans reflects excellent distribution of loans in the AA's moderate-income census tracts when considering significant market competition and demographic barriers present in the AA. The AA has no low-income census tracts in the AA. Specifically, for the evaluation period, the Bank's level of AA lending amongst moderate-income geographies exceeds the aggregate comparators.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The Bank's geographic distribution of small loans to businesses of different sizes within the seven county non-MSA AA is considered excellent. The geographic distribution of small loans to businesses in the AA represents an excellent distribution of loans amongst the moderate-income census tracts. Specifically, FFB's level of AA lending to moderate-income geographies exceeds the aggregate lending comparator.

Jacksonville MSA AA***Home Mortgage Loans***

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of home mortgage loans reflects adequate distribution of loans in the AA's moderate-income census tracts when considering significant market competition and demographic barriers present in the AA. The AA has no low-income census tracts in the AA. Specifically, for the evaluation period, the bank's level of lending amongst moderate-income geographies is below the aggregate comparators, but within a reasonable range when you consider the level of poverty in the AA and the median cost of a home.

Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The Bank's geographic distribution of small loans to businesses of different sizes within the Jacksonville MSA is considered excellent. The geographic distribution of small loans to businesses in the AA represents an excellent distribution of loans amongst the moderate-income census tracts. Specifically, FFB's level of AA lending to moderate-income geographies exceeds the aggregate lending comparator.

Lending Gap Analysis

We reviewed demographic and AA mapping reports and held discussions with senior bank management as part of our assessment of FFB's home mortgage and small business lending activity occurring during the evaluation period to identify potential gaps in the Bank's geographic lending patterns. Data detailing the Bank's lending activity for home mortgage and small business loans did not reveal any unexplained conspicuous gaps within the FFB's Florida AAs. During the evaluation period, FFB consistently ranked amongst the top peer lenders in market share for home mortgage and small business lending to moderate-income geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Non-MSA AA

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

During the full evaluation period the Bank's borrower distribution of home mortgage loans within the AA is considered good given performance context. The borrower distribution of home mortgage loans reflects good penetration amongst individuals of different income levels when considering market competition within the AA and inherent demographic factors. The Bank's level of lending during the evaluation period to low-income borrower was below aggregate lending comparator, however the level of lending to moderate-income borrowers exceeds the aggregate lending comparator, resulting in an overall good performance.

Small Loans to Businesses

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The Bank's borrower distribution of small loans to businesses of different sizes within the AA is considered excellent, given performance context. Overall the borrower distribution of small loans to businesses reflects excellent penetration among businesses of different sizes, as FFB's level of lending to businesses with revenues less than \$1 million exceeds the aggregate CRA data, our primary comparator.

Jacksonville MSA AA

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

During the full evaluation period the Bank's borrower distribution of home mortgage loans within the AA is considered adequate given performance context. The borrower distribution of home mortgage loans reflects adequate penetration amongst individuals of different income levels when considering market competition within the AA and inherent demographic factors. Specifically, the Bank's level of lending during the evaluation period to LMI income borrowers was near to the aggregate lending comparators, meeting the standard for adequate performance when performance context is considered.

Small Loans to Businesses

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The Bank's borrower distribution of small loans to businesses of different sizes within the AA is considered excellent, given performance context. Overall the borrower distribution of small loans to businesses reflects excellent penetration among businesses of different sizes, as FFB's level of lending to businesses with revenues less than \$1 million exceeds the aggregate CRA data, our primary comparator.

Community Development Lending

The institution has made a relatively high level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Community Development lending within the State of Florida is considered excellent and is reflected by the Bank's excellent CD lending within the full scope review AAs during the CD evaluation period. Specifically, FFB originated a total of 19 qualified CD loans totaling \$31.8 million or 14.5 percent of tier 1 capital as of December 31, 2019 in the full scope AAs. This included four loans totaling \$6 million for economic development, one loan for \$1.5 million for affordable housing, three loans totaling \$5.8 million for community services to LMI, one loan for \$66,000 for revitalization of a Designated Disaster Area, and three loans totaling \$13.2 million for revitalization/stabilization of an LMI area.

Other noteworthy examples of CD Lending include:

- A \$3.5 million loan that supported economic development to provide operating funds to a State Economic Development Catalyst Site to include land clearing, infrastructure, and water and sewer.
- Four loans totaling \$13.9 million that supported LMI revitalization to county school boards for construction of a new elementary school.
- A \$1.5 million loan that supported affordable housing to fund continuing operation of a 44-unit rental apartment.

Product Innovation and Flexibility

The institution uses innovative and flexible lending practices in order to serve needs in the State of Florida. Since the previous CRA performance evaluation, FFB continues to offer a standard array of lending products to its customers using flexible and specialized loan practices so to meet the credit needs of its AAs. These flexible/specialized loan practices help to promote lending amongst low- and moderate-income populations, small businesses, and first-time homebuyers.

A listing of the flexible/specialized lending programs FFB offers are listed below:

- Federal Housing Administration
- United States Department of Agriculture Rural Development Program
- Veterans Administration
- Freddie Mac first-time homebuyer loan programs
- PenFed Dream Makers Grants (a nationwide program for military/veterans)
- Federal Home Loan Bank of Atlanta's Affordable Housing Program
- State of Florida and local housing finance authorities (SHIP Programs)
- Florida Housing Finance Corporation – the bank is an approved lender in all counties in Florida for affordable housing products

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Panama City, Gainesville, and Ocala AAs is consistent with the bank's overall performance under the Lending Test in the full-scope area(s).

Overall, lending in the limited-scope assessment areas has had a neutral impact on ratings in the state of Florida.

Refer to Tables O through V in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Florida is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the institution's performance in the full scope assessment areas is good. The institution has an adequate level of qualified community development investment and grants. The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes use of complex investments to support community development initiatives.

QUALIFIED INVESTMENTS									
Assessment Area	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	% of Total	#	\$ (000s)
Full Review									
Non-MSA	0	\$0	187	\$8,623	187	\$8,623	37.02%	0	\$0
Jacksonville	0	\$0	59	\$3,214	59	\$3,214	13.80%	0	\$0
Limited Review									
Panama City	0	\$0	22	\$3,147	22	\$3,147	13.51%	0	\$0
Gainesville	0	\$0	19	\$4,469	19	\$4,469	19.18%	0	\$0
Ocala	0	\$0	18	\$1,277	18	\$1,277	5.48%	0	\$0

The total investments in the full-scope assessment areas of \$11.8 million represent 5 percent of allocated Tier 1 capital. Investments consist of mortgage-backed securities, tax credits, and CDs. In addition to the above investments, the bank made 118 donations totaling \$32.9 million. Investments and donations total 20 percent of allocated Tier 1 capital.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited scope reviews, the bank's performance under the Investment Test in the Panama City, Gainesville, and Ocala assessment areas are consistent with the bank's overall performance under the Investment Test in the full-scope areas. Overall, investments in the limited-scope assessment areas has had a neutral impact on ratings in the state of Florida.

SERVICE TEST

The bank's performance under the Service Test in Florida is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews and performance context factors, the bank's performance in the seven county non-MSA AA and Jacksonville MSA full-scope AAs are good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:											
Non-MSA	67.22	13	56.52	0.00	7.69	69.23	23.08	0.00	6.94	80.44	12.62
Jacksonville	23.00	4	17.39	0.00	0.00	75.00	25.00	0.00	20.32	71.96	7.72
Limited Review:											
Panama City	2.67	1	4.35	0.00	0.00	100.00	0.00	3.56	16.69	52.25	27.50
Gainesville*	1.51	2	8.70	50.00	0.00	0.00	50.00	9.46	22.75	33.04	32.04
Ocala	5.60	3	13.04	0.00	33.34	33.33	33.33	2.27	18.47	63.58	15.68

Non-MSA AA

FFB's service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's Non-MSA AA. The bank operates 13 full-service branch offices in the AA; one branch located in a moderate-income geography, nine in middle-income and three in upper-income geographies. There are no low-income geographies in the AA. Eight of the nine branches located in middle-income geographies were designated as distressed or underserved nonmetropolitan geographies by the banking agencies due to the economic conditions, specifically high levels of poverty levels in those middle-income geographies. As shown in the table above, the bank's distribution of branches in moderate-income geographies exceeds the AA population living within those geographies. All branches have ATMs, and except for the Graceville branch, also have drive-thru facilities. The bank also operates two free standing ATMs.

FFB's alternative delivery systems are readily accessible to individuals residing in the AA. Alternative delivery systems include debit cards and ATMs, no-cost telephone and online banking, electronic bill pay and mobile banking options. Consumers and customers can open certain deposit accounts online through the bank's website. Customers can also access over 55,000 ATMs free of charge through the AllPoint ATM Network. A substantial majority of ATMs have deposit-taking capabilities including the one branch located in a moderate-income geography and in most distressed middle-income geographies. These systems provide additional delivery availability and access to banking services for low-and moderate-income individuals and small businesses.

Jacksonville MSA AA

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the Jacksonville MSA AA. The bank operates four full-service branch offices in the AA; one in an upper-income and three in middle-income geographies. There are no low-income geographies in the AA. All branches have deposit taking ATMs and drive-thru facilities. The bank also operates a free-standing deposit taking ATM located in a middle-income geography. Although there are no branches in moderate-income geographies within the AA, alternative delivery systems provide good accessibility to low- and moderate-income individuals and small businesses residing and operating in the AA. Alternative delivery systems available in the Jacksonville MSA AA do not differ from those offered bank wide.

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
Full Review:			Low	Mod	Mid	Upp
Non-MSA	0	0	0	0	0	0
Jacksonville	2	1	0	0	+1	0
Limited Review:						
Panama City	0	0	0	0	0	0
Gainesville	2	0	+1	0	0	+1
Ocala	4	1	0	+1	+1	+1

Non-MSA AA

The bank did not open or close branches in the Non-MSA AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. FFB maintains standard business hours and offers traditional banking products, mortgages, consumer and small business lending and services at all branch locations in the AA.

FFB offers bank-wide an array of deposit and loan products and services typical for a community bank. The bank offers deposit products that are attractive to low- and moderate-income individuals and small businesses. The bank offers low-to-no-cost checking and savings account products geared towards low- and moderate-income individuals and small businesses. FFB offers responsive loan products to assist low- and moderate-income individuals with mortgage financing and include: Federal Housing Administration, Veterans Administration, United States Department of Agriculture/Rural Housing, and Freddie Mac. To assist small businesses with their financing needs, the bank offers SBA 504 and 7(a) loans as well as Rural Economic Development Council Loans. The need for affordable housing and small business financing was frequently mentioned during our meeting with community contacts.

Jacksonville MSA AA

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, FFB opened one branch located in a middle-income geography and closed one existing branch located in an upper-income geography. As part of the CBC acquisition in 2018, the bank purchased one office in the AA, located in an upper-income geography and near a moderate-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. FFB maintains standard business hours and offers traditional banking products, mortgages, consumer and small business lending and services at all branch locations in the AA. Deposit and loan products offered in the Jacksonville AA do not differ from those offered bank wide.

Community Development Services

The bank provides a relatively high level of community development services.

FFB provides an excellent level of CD services and is a leader in providing community development services responsive to the needs in the Non-MSA and adequate level of community development services in the Jacksonville MSA.

Non-MSA AA

Based on the level of CD services in the Non-MSA AA, we concluded the provision of CD services is excellent. Bank personnel have engaged in community development activities that are responsive to community needs of its AAs as evidenced by the number and types of nonprofit organizations served and number of employees actively involved. Of the 68 different organizations that 39 bank employees served, 29 represented leadership roles within those organizations. During the evaluation period, employees served nonprofit organizations involved with providing basic health and other services for low-and moderate-income persons (54); assisting low-and moderate-income individuals with affordable housing (6); and, economic development for small businesses (8).

During the evaluation period, staff members provided 45 hours for 26 financial literacy training events attended by 1,516 attendees for 21 nonprofit organizations. Financial literacy training was provided to help low- and moderate-income individuals to learn basic banking concepts and/or enhance financial skills. A substantial majority were to students that attend schools eligible for free or reduced lunch programs. The bank also provided financial literacy education to small businesses and low-and moderate-income senior citizens residing in the AA. Financial literacy training and financial expertise assistance have been identified as crucial credit needs in the AA.

These types of services provided are not innovative in nature, but primarily address the identified credit needs of the community.

Notable examples include:

- In conjunction with SBA, the bank provided financial literacy training to small businesses residing in the AA. Topics discussed included how to obtain SBA financing to support capital needs for these small businesses.
- Staff members conducted the initial presentation of the Banzai Program and financial literacy materials to 216 teachers and students for six schools for a combined total of 9 hours. Banzai is a computer module that presents real life financial scenarios to the students and follows a financial path based on the student's individual responses. The students learn valuable financial education while having fun because they're in control of the scenario. A substantial majority of the students attending these schools are eligible for free or reduced lunch programs.
- Carc/Carc Housing: A private, not for profit 501(c) 3 service organization located in Lake City. The organization provides housing, training, employment, and other support opportunities for low-income persons with disabilities. Affordable housing consists of a low rent apartment subsidized by the HUD. During the evaluation period, two bank officers served as Treasurer, President, Chairman, Director, and Board Member. Affordable housing needs in the AA continues to be an ongoing critical need.
- Christian Service Center: A nonprofit community-based service organization that provides assistance with food, clothing, household goods, furniture and some financial assistance to low income persons. During the evaluation period, a bank officer served as a Board Member, HR Committee Chair and served on the Personnel Committee.

Jacksonville MSA AA

Based on the level of CD services in the Jacksonville MSA, we concluded the provision of CD services is adequate. Bank personnel have satisfactorily engaged in community development activities that are responsive to the community needs of its AAs. Of the 10 different organizations that seven bank employees served, three represented leadership roles within those organizations. During the evaluation period, employees served nonprofit organizations involved with providing basic health and other services for low-and moderate-income persons (8); assisting low-and moderate-income individuals with affordable housing (1); and, economic development for small businesses (1).

During the evaluation period, staff members provided 13 hours for four financial literacy training events attended by 72 attendees for four nonprofit organizations. Financial literacy training was provided to help low- and moderate-income youth learn basic banking concepts and/or enhance financial skills. Financial literacy training and financial expertise assistance have been identified as crucial credit needs in the AA. The following are a few examples of community development services provided during the evaluation period:

- Take Stock in Children: A bank representative serves on the board and Leadership Council of this community service organization that provides college scholarships and mentoring to academically qualified low-income students residing in the AA.
- Northeast Florida Regional Council on Affordable Housing: A bank representative served on the Council as a panelist of this community service organization that promotes affordable housing programs through a partnership of federal, state and local government agencies. This nonprofit

also operates as the program administrator of Ship that provides housing assistance to low- and moderate-income households residing in Baker County.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test for the Panama City, Gainesville, and Ocala AAs, the bank's performance is consistent with the performance of the full scope AAs in the state. Overall, services in the limited-scope assessment areas has had a neutral impact on ratings in the state of Florida.

State Rating

State of South Carolina

CRA rating for the State of South Carolina: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending activity reflects adequate responsiveness to meeting the credit needs of the Bank's assessment area, given performance context.
- The bank's AAs concentration needs to improve given the small percentage of loans made in the AAs.
- The geographic distribution of loans reflects an adequate distribution of loans in the assessment area.
- Retail delivery systems are accessible to low- and moderate-income (LMI) geographies.

Description of Institution's Operations in South Carolina

FFB operates two branches and two ATMs in the state of South Carolina. The branches and ATMs are all located in the Hilton Head Island-Bluffton-Beaufort MSA. The bank's AA includes only Beaufort County. A very limited amount of the bank's deposits is held in South Carolina, with just \$67.2 million or about six percent of the bank's total deposits as of December 31, 2019. FFB is ranked number 12th out of 19 institutions with a deposit market share of two percent based on FDIC market share information as of June 30, 2019.

Hilton Head Island-Bluffton-Beaufort MSA AA

The Hilton Head Island-Bluffton-Beaufort MSA AA includes only Beaufort County. The AA includes one contiguous county which is comprised of 41 census tracts with income designations: 11 moderate-income tracts, 16 middle-income tracts, and 13 upper-income tracts. This county does not have any low-income tracts. The AA includes geographies where the institution has two branch offices, each with an ATM. The AAs deposit information and market share are mentioned above.

The following tables depict the demographic information for the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: First Fed FL - Hilton Head						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	41	0.0	26.8	39.0	31.7	2.4
Population by Geography	171,420	0.0	26.6	50.3	23.1	0.0
Housing Units by Geography	93,858	0.0	21.6	45.2	33.2	0.0
Owner-Occupied Units by Geography	46,204	0.0	16.9	51.4	31.6	0.0
Occupied Rental Units by Geography	19,771	0.0	34.4	49.0	16.6	0.0
Vacant Units by Geography	27,883	0.0	20.2	32.1	47.6	0.0
Businesses by Geography	14,847	0.0	16.2	54.6	29.2	0.0
Farms by Geography	403	0.0	24.3	55.6	20.1	0.0
Family Distribution by Income Level	44,911	17.7	18.2	21.2	42.9	0.0
Household Distribution by Income Level	65,975	20.6	16.5	18.3	44.5	0.0
Median Family Income MSA - 25940 Hilton Head Island-Bluffton, SC MSA		\$63,345	Median Housing Value			\$312,936
			Median Gross Rent			\$1,054
			Families Below Poverty Level			8.7%
Source: 2015 ACS and 2019 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

Community contacts indicate that affordable housing and small business loans are a critical need in the AA. The AA was severely impacted by the housing crisis that began in 2006 and 2007 leading to the national recession that ended in 2009. Recovery was slow, but for the past ten years, employment has improved, as well as home sales. The poverty level for the AA is moderate with 8.7 percent of the families living below the poverty level. The 2015 American Community Survey (ACS) Census estimates the median value of owner-occupied housing units in the AA is \$312,936, with gross rents at \$1,054, which is high and may be out of reach for individuals below the poverty line.

The ACS estimated a median family income for the AA \$63,345. Considering the median family income and the moderate poverty level in the AA, LMI families may have difficulty with affording mortgage payments without subsidies given the high housing costs and added costs of insurance and taxes. LMI renters, particularly low-income, also need rental subsidies to assist with rental payments. According to the 2015 ACS Census, 14 percent of households spend more than 30 percent of their income for rent payments.

The banking industry in the AA is very competitive for loans, deposits, and investments, as well as CRA CD opportunities. There are several branches of nationwide and regional banks, local community banks, mortgage companies, credit unions, and other nonbank financial service providers. Investment opportunities are highly competitive with banks purchasing investments to support affordable housing for LMI individuals/geographies and small business lending. Many community banks tend to purchase mortgage backed securities with home mortgages to LMI people or loans in LMI geographies, affordable housing, multifamily properties, or Small Business Administration loan pools in

their AAs. The opportunity to make donations/grants to qualifying organizations that have missions that support the CRA CD purpose are available. CD lending opportunities are available in the AA including opportunities to partner with nonprofit organizations that have a CD mission or purpose.

Scope of Evaluation in South Carolina

This Performance Evaluation is an assessment of FFB's ability to meet the credit needs of its communities. The bank was evaluated using the procedures for large banks. These procedures include tests for Lending, Investments, and Services. The bank's primary loan products over the evaluation period were home mortgage and small business loans. For purposes of this evaluation, we gave more weight to the bank's home lending as it makes up a significant majority of the bank's lending activity when considering the number and dollar amount of loans. Small business lending was also considered. FFB's performance for the lending test is based on an assessment of its home mortgage, small business and CD activities. We conducted a full-scope review of the Hilton Head Island-Bluffton-Beaufort MSA AA, which includes only Beaufort County. There are no other AAs in South Carolina. Refer to the tables in appendix A for more information.

The evaluation period for the Lending Test and CD loans is April 2, 2018 through December 31, 2019. For the Investment Test and Service Test, the evaluation period is April 2, 2018 through December 31, 2019. The first branch in this AA was opened on April 2, 2018, which is why the evaluation period for this state is different from the state of Florida. Our conclusions related to CD loans, qualified investments including donations, and CD services were based on the number and dollar amounts made during the evaluation period. In addition, we considered the level of innovation, complexity, responsiveness to community credit needs and the degree to which these instruments are not routinely provided by private investors.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in the State of South Carolina is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Hilton Head Island-Bluffton-Beaufort MSA AA is adequate. Lending activity in the AA that received a full-scope review reflects adequate responsiveness to the assessment area credit needs given competition from other lenders in the counties.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full Review							
Hilton Head	114	74	3	0	191	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Full Review							
Hilton Head	\$33,321	\$12,324	\$52	\$0	\$46,097	100%	100%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Based on FDIC Deposit Market Share data as of June 30, 2019, the bank ranked first in deposits with 0.10 percent market share in the AA. The 2018 HMDA peer mortgage data is not meaningful for this assessment as the bank first opened a branch in this AA in April of 2018. The Bank is competing against large national banks, as well as local banks that focus on mortgage lending, and private and online lending companies. Additionally, the Bank's overall strategy results in significant mortgage lending outside its AAs. First Tennessee Bank, Baxter Credit Union, and Success Mortgage Partners are some of the top lenders and deposit takers in the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

Refer to Table O in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of home mortgage loans reflects excellent distribution of loans in the AA's moderate-income census tracts when considering significant market competition and demographic barriers present in the AA. The AA has no low-income census tracts. Specifically, for the evaluation period, the Bank's level of lending amongst moderate-income geographies exceeds the aggregate comparators.

Small Loans to Businesses

Refer to Table Q in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The Bank's geographic distribution of small loans to businesses of different sizes within the AA is considered excellent. The geographic distribution of small loans to businesses in the AA represents an excellent distribution of loans amongst the moderate-income census tracts. The AA has no low-income

census tracts. Specifically, FFB's level of AA lending to moderate-income geographies exceeds the aggregate lending comparator.

Lending Gap Analysis

We reviewed demographic and AA mapping reports and held discussions with senior bank management as part of our assessment of FFB's home mortgage and small business lending activity occurring during the evaluation period to identify potential gaps in the Bank's geographic lending patterns. Data detailing the Bank's lending activity for home mortgage and small business loans did not reveal any unexplained conspicuous gaps within the FFB's South Carolina's AA. During the evaluation period, FFB consistently ranked amongst the top peer lenders in market share for home mortgage and small business lending to moderate-income geographies.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

Refer to Table P in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

During the full evaluation period the Bank's borrower distribution of home mortgage loans within the AA is considered adequate given performance context. The borrower distribution of home mortgage loans reflects adequate penetration amongst individuals of different income levels when considering market competition within the AA and inherent demographic factors. The Bank's level of lending during the evaluation period to low-income borrower was below aggregate lending comparator, however the level of lending to moderate-income borrowers meets the aggregate lending comparator, resulting in an overall adequate performance.

Small Loans to Businesses

Refer to Table R in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The Bank's borrower distribution of small loans to businesses of different sizes within the AA is considered excellent, given performance context. Overall the borrower distribution of small loans to businesses reflects excellent penetration among businesses of different sizes, as FFB's level of lending to business with revenues less than \$1 million exceeds the aggregate CRA data, our primary comparator.

Community Development Lending

The institution has made a few if any CD loans in this AA.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Community Development lending within the State of South Carolina is considered poor and is reflected by the fact that no CD loans were made in the AA. Considering the bank's lending market share in this

AA and the low level of the bank's deposits attributed to the AA, a very poor rating is not warranted. Additionally, the branches in this AA were opened in 2018.

Product Innovation and Flexibility

The institution uses innovative and flexible lending practices in order to serve AA credit needs. Since the previous CRA performance evaluation, FFB continues to offer a standard array of lending products to its customers using flexible and specialized loan practices to meet the credit needs of its AAs. These flexible/specialized loan practices help to promote lending amongst low- and moderate-income populations, small businesses, and first-time homebuyers.

A listing of the flexible/specialized lending programs FFB offers are listed below:

- Federal Housing Administration
- United States Department of Agriculture Rural Development Program
- Veterans Administration
- Freddie Mac first-time homebuyer loan programs
- PenFed Dream Makers Grants (a nationwide program for military/veterans)
- Federal Home Loan Bank of Atlanta's Affordable Housing Program
- SBA Works

INVESTMENT TEST

The bank's performance under the Investment Test in South Carolina is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the full scope assessment areas is good. The institution has an adequate level of qualified community development investment and grants. The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes use of complex investments to support community development initiatives.

QUALIFIED INVESTMENTS									
Assessment Area	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$ (000s)	#	\$ (000s)	#	\$ (000s)	% of Total	#	\$ (000s)
Full Review									
Hilton Head	0	\$0	4	\$2,466	4	\$2,466	100%	0	\$0

The Bank had an excellent level of qualified investments in the AA that exhibited excellent responsiveness to credit and community economic development needs. During the Assessment Period, the Bank's investments for the AA included \$2.4 million for a Section 8 multifamily apartment complex, \$592,000 in Ginnie Mae loan pools, \$12,000 in Fannie Mae loan pools, and \$18,000 in

donations to 12 community development organizations. Finally, the Bank had a \$100,000 EQ2 investment in the South Carolina Community Loan Fund for affordable housing purposes from the prior exam cycle.

SERVICE TEST

Conclusions for Area Receiving Full-Scope Review

The bank's performance under the Service Test in South Carolina is rated Low Satisfactory.

Based on the full-scope review, the bank's performance in the Hilton Head AA is adequate.

Retail Banking Services

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Hilton Head	100.00	2	100.00	0.00	50.00	50.00	0.00	0.00	26.60	50.33	23.07

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA. The bank operates two full-service branch offices in the AA; one located in a moderate-income geography the other in a middle-income geography. There are no low-income geographies in the AA. Both branches have ATMs and drive-thru facilities. As noted in the table above, the bank's distribution of branches in moderate-income geographies significantly exceeds the AA population living within those geographies.

FFB's alternative delivery systems are accessible to individuals residing in the AA. Alternative delivery systems include debit cards and ATMs, no-cost telephone and online banking, electronic bill pay and mobile banking options. Consumers and customers can open certain deposit accounts online through the bank's website. Customers can also access over 55,000 ATMs free of charge through the AllPoint ATM Network. Both ATMs have deposit-taking capabilities including the one branch located in a moderate-income geography. These systems provide additional delivery availability and access to banking services for low-and moderate-income persons and small businesses.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Hilton Head	2	0		+1	+1	

To the extent changes have been made, the bank's opening and closing of branches has improved the accessibility of its delivery systems, particularly in moderate-income geographies and/or to low- and moderate-income individuals. As part of the CBC acquisition in 2018, the bank purchased two offices in the AA, enhancing the level of accessibility in the AA, especially to moderate-income geographies and/or low-and moderate persons.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals. FFB maintains standard business hours and offers traditional banking products, mortgages, consumer and small business lending and services at all branch locations in the AA. Alternative delivery systems available in the Hilton Head AA do not differ from those offered bank wide.

FFB offers a wide array of deposit and loan products and services typical for a community bank. The bank offers deposit products that are attractive to low- and moderate-income persons and small businesses. The bank offers low-to-no-cost checking and savings account products geared towards low- and moderate-income individuals and small businesses. FFB offers responsive loan products to assist low- and moderate-income individuals with mortgage financing and include: Federal Housing Administration (FHA), Veterans Administration (VA), United States Department of Agriculture/Rural Housing (USDA), Freddie Mac (FHLMC). To assist small businesses with their financing needs, the bank offers SBA 504 and 7(a) loans as well as Rural Economic Development Council Loans.

Community Development Services

FFB bank provided a low level of community development services during the evaluation period. The bank's community development performance is poor.

During the evaluation period, two staff members provided financial expertise for two nonprofit community development organizations by serving on the board and providing technical assistance. Staff members also provided two training sessions for a combined total of 2.0 hours of financial education to 25 attendees. Nonprofit organizations served during the evaluation period include community-based affordable housing and service organizations that provide affordable housing ownership and community development services geared towards low- and moderate-income individuals. These types of services provided are not innovative in nature, but primarily address the identified credit needs of the community. The following is one example of community development service during the evaluation period:

- Lowcounty Habitat for Humanity: A bank representative served on the board of directors by providing financial expertise for this community-based affordable housing organization that provides affordable housing and financial education to low- and moderate-income individuals.

Appendix A: Scope of Examination

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

Time Period Reviewed:	1/1/2017-12/31/2019	
Bank Products Reviewed:	HMDA CRA-reportable, small business Community Development – eligible loans, investments, and services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Reviewed		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Florida		
MSA 27620	Full-scope	Counties of Baker and Nassau
Non-MSA	Full-scope	Counties of Columbia, Hamilton, Holmes, Jackson, Lafayette, Suwannee, and Washington
MSA 37460	Limited-scope	County of Bay
MSA 23540	Limited-scope	County of Alachua
MSA 36100	Limited-scope	County of Marion
State of South Carolina		
MSA 25940	Full-scope	County of Beaufort

Appendix B: Summary of State Ratings

RATINGS First Federal Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State:				
State of Florida	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of South Carolina	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, 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-Scope 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 conduct 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 applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

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-Scope 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: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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) 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.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of 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 the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - 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 aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - 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 MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were 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) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2019	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Florida																				
Gainesville	139	28,364	5.6	6,452	2.4	3.6	3.9	14.9	8.6	11.9	37.5	47.5	35.2	44.6	39.6	48.4	0.6	0.7	0.7	
Jacksonville	621	145,854	25.2	4,742	0.0	0.0	0.0	18.8	11.6	15.7	71.1	83.3	73.2	10.2	5.2	11.1	0.0	0.0	0.0	
Non MSA	1,072	158,104	43.5	3,299	0.0	0.0	0.0	7.5	3.8	2.8	80.0	79.3	83.2	12.5	16.9	14.1	0.0	0.0	0.0	
Ocala	301	52,493	12.2	12,017	0.6	0.3	0.1	14.5	10.3	11.3	69.6	69.4	70.5	15.3	19.9	18.0	0.0	0.0	0.0	
Panama City	219	46,953	8.9	6,460	2.5	0.0	0.8	13.3	5.9	5.8	52.4	58.4	58.7	31.8	35.6	34.7	0.0	0.0	0.0	
South Carolina																				
Hilton Head	114	33,321	6.7	9,045	0.0	0.0	0.0	16.9	28.9	10.4	51.4	62.3	59.3	31.6	8.8	30.3	0.0	0.0	0.0	
Total	2,466	465,089	100.0	42,015	0.9	0.2	0.8	13.9	8.2	10.2	61.6	74.7	62.2	23.5	16.9	26.8	0.1	0.0	0.1	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-2019**

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Florida																			
Gainesville	139	28,364	9.4	6,452	23.4	3.6	6.9	15.4	21.6	18.4	18.2	27.3	19.0	43.0	37.4	41.1	0.0	10.1	14.7
Jacksonville	621	145,854	25.2	4,742	20.4	3.2	4.3	20.3	12.6	14.6	19.5	27.5	23.2	39.8	52.0	44.3	0.0	4.7	13.5
Non MSA	1,072	158,104	43.5	3,299	23.1	3.9	5.5	16.8	19.4	16.1	19.1	26.3	23.7	41.0	46.6	38.2	0.0	3.7	16.5
Ocala	301	52,493	17.7	12,017	19.3	1.7	5.5	19.5	16.9	16.9	21.6	20.9	23.5	39.7	47.2	35.3	0.0	13.3	18.7
Panama City	219	46,953	22.2	6,460	21.1	5.0	4.3	17.7	19.2	12.5	19.9	25.6	21.1	41.3	46.1	46.7	0.0	4.1	15.5
South Carolina																			
Hilton Head	114	33,321	11.6	9,045	17.7	3.5	3.7	18.2	12.3	12.3	21.2	21.1	18.3	42.9	56.1	53.4	0.0	7.0	12.4
Total	2,466	465,089	100.0	42,015	20.7	3.5	5.0	17.9	17.2	15.1	20.1	25.7	21.3	41.2	47.9	43.1	0.0	5.7	15.5

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2017-2019**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Florida																			
Gainesville	20	4,983	1.18	5,108	7.2	11.1	8.3	16.3	11.1	18.0	36.6	22.2	30.9	39.0	66.7	42.0	0.9	0.0	0.9
Jacksonville	358	69,075	21.13	1,841	0.0	0.0	0.0	21.4	24.6	23.2	65.1	74.1	62.4	13.5	14.2	14.4	0.0	0.0	0.0
Non MSA	1,022	202,983	60.33	2,631	0.0	0.0	0.0	6.8	7.5	5.4	80.0	86.5	81.8	13.2	12.8	12.8	0.0	0.0	0.0
Ocala	149	35,589	8.80	6,838	1.9	3.2	2.1	16.4	23.0	17.2	63.9	71.4	63.9	17.9	20.63	16.8	0.0	0.0	0.0
Panama City	71	18,207	4.19	4,279	3.2	1.7	1.8	18.5	26.6	16.0	53.0	53.1	54.9	25.3	29.69	27.3	0.0	0.0	0.0
South Carolina																			
Hilton Head	74	12,324	4.37	4,523	0.0	0.0	0.0	16.2	28.57	13.9	54.6	77.78	53.2	29.2	11.1	32.9	0.0	0.0	0.0
Total	1,694	340,161	100.0	25,220	2.6	0.5	2.5	15.8	13.9	15.8	57.4	72.2	55.5	24.0	13.4	26.0	0.2	0.0	0.2

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues**2017-2019**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Florida											
Gainesville	20	4,983	1.1	5,108	87.5	70.0	46.3	3.7	30.0	8.8	0.0
Jacksonville	358	69,075	14.9	1,841	90.6	68.2	43.8	2.3	31.8	7.1	0.0
Non MSA	1,022	202,983	43.6	2,631	87.0	65.2	40.0	3.3	34.8	9.8	0.6
Ocala	149	32,589	7.0	6,838	90.2	57.7	46.7	3.2	42.3	6.6	0.0
Panama City	71	18,207	3.9	4,279	88.3	54.9	39.9	3.4	45.1	8.4	0.0
South Carolina											
Hilton Head	74	12,324	2.6	4,523	87.2	70.3	47.0	4.5	29.7	8.3	--
Total	1,694	340,161	100.0	25,220	88.5	61.0	44.6	3.4	38.5	8.1	0.5

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%