



## **PUBLIC DISCLOSURE**

November 30, 2015

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Seacoast National Bank  
Charter Number: 14838

815 Colorado Avenue  
Stuart, FL 34995-9012

Office of the Comptroller of the Currency

Miami Field Office  
9850 NW 41st Street, Suite 260  
Miami, FL 33178

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

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## Overall CRA Rating

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

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

Performance Levels	Seacoast National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory		X	
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

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

## Definitions and Common Abbreviations

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

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

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

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

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

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development.

Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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

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

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

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

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

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

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine

the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

## Description of Institution

Seacoast National Bank (SNB) is a publicly traded intrastate community Bank headquartered in Stuart, Florida. SNB is a wholly owned subsidiary of Seacoast Banking Corporation of Florida, a one-bank holding company also headquartered in Stuart. The holding company's consolidated assets totaled approximately \$3.3 billion. The Bank had fourteen subsidiaries during the evaluation period of which eight were operating subsidiaries, and six were statutory subsidiaries. The operating subsidiaries include South Branch Building, Inc., which owns one of the Bank's branch locations. TCoast Holdings, LLC, BR West, LLC, and TC Property Venture, LLC, which own and operate certain properties acquired through foreclosure. TC Stuart LLC, similar in operation was dissolved in the state of Florida on April 26, 2013. Commercial Business Finance Inc. (CBF), a receivables factoring company that was acquired in the BANKshares acquisition, provides working capital financing for small to medium sized business. BankFIRST Realty, Inc., acquired in the BANKshares acquisition, owns and operates certain properties acquired through foreclosure. The Bank directly owns all the common equity in six statutory trusts related to the Bank's trust preferred securities and they are SBCF Capital Trust I, SBCF Statutory Trust II, SBCF Statutory Trust III, BankFIRST (FL) Statutory Trust I, BankFIRST (FL) Statutory Trust II, and The BANKshares Capital Trust I. The operation of these subsidiaries does not affect the Bank's ability to lend or invest in its community. Activities from these subsidiaries are not considered in the Bank's CRA Performance Evaluation.

As of September 30, 2015, SNB reported total assets of approximately \$3.3 billion and total deposits of \$2.7 billion. Tier 1 capital totaled \$302.5 million. The Bank had a profit of \$17 million as of September 30, 2015 and was also profitable in 2012, 2013, and 2014. While the Bank offers a full range of loan products, as outlined in its CRA Public File, the Bank's primary business focus is residential lending and small business lending. The loan portfolio, which totaled \$2 billion, represented 61 percent of total assets. The loan portfolio consists of residential mortgage loans (36 percent), commercial real estate loans (50 percent), commercial loans (10 percent), and consumer loans (four percent). The Bank regularly sells the residential real estate loans it originates on the secondary market. SNB has traditionally not purchased home mortgage loans or small business loans, but did purchase some during this evaluation period. SNB purchased residential loans to support the raising of capital for Habitat for Humanity, an affordable housing organization, in Desoto and Martin Counties. Purchased business loans supported the Bank's small business lending efforts.

During the evaluation period, SNB operated 44 branch offices in 14 counties in Central and South Florida. The Bank has no offices in Broward County but has a deposit taking ATM in that county. There are 19 branches on the "Treasure Coast" that includes Martin, St. Lucie, and Indian River Counties, the Bank's primary market area. Branches are also located in Brevard, Desoto, Glades, Hendry, Highlands, Okeechobee, Orange, Lake, Seminole, Volusia, and Palm Beach.

There are no legal, financial, or other factors impeding SNB's ability to help meet the credit needs in its assessment areas. However, the Bank operated under a Formal Agreement with the Office of the Comptroller of the Currency during part of the evaluation period through September 19, 2013 that focused on the reduction of credit risk, problem assets, and the management of real estate concentrations that limited the volume of real estate lending activity. At its last CRA evaluation, dated October 19, 2012, the Bank was rated "Outstanding".

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

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

With the exception of community development loans, the evaluation period for the Lending Test is January 1, 2012 through September 30, 2015. For community development loans, the Investment Test, and the Service Test, the evaluation period is October 19, 2012, the date of the last CRA evaluation, through November 30, 2015.

### Data Integrity

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

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

### Selection of Areas for Full-Scope Review

The Bank currently has nine assessment areas in Florida. The Metropolitan Statistical Area (MSA) 38940 (Port St. Lucie-Ft. Pierce, FL) which consists of Martin and St. Lucie Counties and the Non-MSA counties of Desoto, Glades, Hendry, and Okeechobee Counties were selected for full-scope reviews. We selected assessment areas considering the loans, deposits, the number of branch offices, and the length of time branch offices have operated in the respective market under the SNB brand.

For analysis purposes, the Non-MSA counties are combined into one assessment area given they have the same median family incomes and reference as the Non-MSA assessment area in this Performance Evaluation. The full-scope MSAs represent approximately 53 percent of the deposits as of June 30, 2015 based on the Federal Depository Investment Corporation (FDIC) and 47 percent of the total number of loans analyzed at this examination. Refer to Appendix A for additional information regarding the assessment area receiving a full-scope review. The remaining seven assessment areas received limited-scope reviews and include the following:

- Metropolitan Division (MD) 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL) - Broward County
- MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)- Palm Beach County
- MSA 19660 (Deltona- Daytona Beach- Ormond Beach, FL)- Flagler and Volusia Counties
- MSA 36740 (Orlando-Kissimmee, FL)- Lake, Orange, Osceola, and Seminole Counties

- MSA 37340 (Palm Bay-Melbourne-Titusville, FL)- Brevard County
- MSA 42680 (Sebastian-Vero Beach, FL)- Indian River County
- MSA 42700 (Sebring, FL)- Highlands County

## Ratings

The Bank's overall rating is based primarily on those areas that received full-scope reviews; however, performance in limited scope assessment areas was also factored into the overall rating. The most weight was given to performance in the MSA 38940 (Port St. Lucie-Fort Pierce, FL) assessment area, because it alone represents approximately 44 percent of the Bank's deposits as of June 30, 2015 and 43 percent of loans reported for this examination. The Non-MSA assessment area represents approximately 10 percent of deposits and four percent of loans reported for this examination.

Based on loan volumes, HMDA loan performance was more heavily weighted than performance related to small loans to businesses. The number of HMDA loans represents approximately 70 percent of loans analyzed at this examination. Within HMDA loans, home purchase loans received the most weight because they represent 76 percent of all HMDA loans analyzed. Home improvement and refinance loans were given equal weight.

Due to the limited number of low- and moderate -income geographies (nine and 22 respectively) in the full-scope assessment areas, more weight was given to the distribution of loans by income level of the borrower segment of the Lending Test than distribution of loans by income level of the geography. There were more moderate-income geographies than low-income geographies for the full scope assessment areas. For the Non-MSA, consideration was given to distressed and underserved middle-income geographies in addition to low- and moderate-income geographies. There were 16 distressed geographies because of high poverty levels and three of the 16 geographies were also distressed from high unemployment.

## Other

Community credit needs in the assessment area were determined by reviewing recent housing and demographic information, other CRA performance evaluations from other banks operating in the Bank's assessment areas, and we conducted two community contacts, one in each full-scope assessment area. Both contacts were with local non-profit affordable housing organizations.

Presently, the most critical needs identified were those associated with providing affordable housing, small business lending, job opportunities, and community services directed to the unemployed and homeless. The latter two needs are directly associated with the continued recovery from the recession aftermath of high unemployment, high home foreclosures, and increased poverty levels. For additional information, see the Market Profile in Appendix B.

## **Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c), or 12 CFR 195.28(c), in determining a national bank's (bank) or Federal savings association's (FSA) CRA rating, respectively, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank or FSA, or in any assessment area by an affiliate whose loans have been considered as part of the bank's or FSA's lending performance.

The OCC did not identify evidence of discriminatory or other illegal credit practices with respect to this institution.

## Conclusions with Respect to Performance Tests

### LENDING TEST

#### Conclusions for Areas Receiving Full-Scope Reviews

The Bank's performance under the lending test is rated "Outstanding", when considering the Bank's community development loan performance. Based on full-scope reviews, the Bank's performance in the Port St. Lucie-Ft. Pierce MSA and the Non-MSA is excellent.

#### Lending Activity

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

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

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

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

*Home mortgage lending activity is good, when the Bank's deposit market share and rank is compared with its HMDA loan market share and rank, when considering performance context.* SNB's deposit market share in the Port St. Lucie-Ft. Pierce MSA assessment area was 14.89 percent and the Bank ranked second, according to FDIC data as of June 30, 2014. The Bank's market share of all HMDA loan originations and purchases was 4.50 percent and it ranked fourth of 446 lenders reporting HMDA loans in the assessment area. SNB's lender share of HMDA loans was significantly lower than its deposit market share. SNB's HMDA lender rank was near its deposit market share ranking. The market is dominated by Wells Fargo Bank, National Association (NA) and Fidelity Funding Mortgage Corporation with market shares of 12.21 percent and 5.04 percent, respectively.

For HMDA loan originations and purchases, the Bank's lender market share is significantly lower but the rank is near the Bank's deposit market share and rank for Martin and St. Lucie MSAs. However, the Bank's performance was challenged by the large number of non-deposit taking HMDA lenders in the assessment area with many of them offering a far greater variety of mortgage products than SNB, and the slow economic recovery during the evaluation period. These factors made it very difficult for the Bank to have comparable deposit market share and HMDA lender share performance. Other factors involved a Bank focus of preparing systems and personnel for regulatory requirements for residential mortgages and the search for additional qualified lenders at the Bank.

Competition for mortgage loans is very strong in the assessment area. As noted above, there are a very large number of lenders reporting loan originations and purchases under the HMDA, many of them among the largest mortgage lenders in the United States. Most are mortgage companies and financial institutions that do not take deposits in the assessment area. In 2014, there were 20 financial institutions reporting deposits in the Port St. Lucie-Ft. Pierce MSA and 446 lenders reporting HMDA activity based on 2014 aggregate data (the most current data available). For further discussion on performance context issues, please see the Market Profile in Appendix B.

Considering performance context, home mortgage lending activity is adequate. For home purchase loans, SNB's market share is significantly below its deposit market share and exceeds its rank. SNB's market share (by number), based on aggregate data from 2014 is 5.37 percent, and the Bank is ranked third of 367 lenders reporting home purchase loans in the assessment area. For home improvement loans, SNB's market share is near its deposit market share and near its rank. The Bank's home improvement market share is 10.27 percent and the rank is fourth of 273 lenders reporting home improvement loans. For refinance loans, both the Bank's loan market share and rank are significantly below its deposit market share and rank. SNB has a refinance loan market share of 1.37 percent (by number) and is ranked fifteenth of 261 lenders reporting refinance loans in the assessment area. The home purchase market is dominated by Wells Fargo Bank, NA and Fidelity Funding Mortgage Corporation who rank first and second respectively, with a combined market share of approximately 20 percent. For home improvement loans, the market is dominated by Wells Fargo Bank, NA, SunTrust Bank, Inc., and PNC Bank, NA who rank first, second, and third respectively with a combined market share of approximately 37 percent. For refinance loans, the market is dominated by Quicken Loans and Wells Fargo Bank, NA who rank first and second, respectively, and have a combined market share of approximately 21 percent.

*Given performance context, economic conditions during the evaluation period, the residential lending focus of the Bank, and the high level of competition in the Port St. Lucie-Ft. Pierce MSA, small business lending activity is good. The Bank's market share of such loans is below its deposit market share, and its rank exceeds its deposit share rank.*

Based on 2014 aggregate data, the Bank's lender market share of loans to small businesses is 7.89 percent (based on dollar volume) and the Bank is ranked fourth of 72 lenders reporting such loans in the assessment area. Market share and rank are based on the dollar volume of loans rather than number of loans because of the inclusion of credit card lenders in small loans to businesses reporting. Credit card lenders originate a large number of small loans to businesses, but the dollar volume is significantly smaller. For example, the top five reporters of small loans to businesses are all credit card lenders that, combined, have a market share of 56 percent based on number of loans but approximately 22 percent based on dollar volume. On an individual basis, the largest originator of small loans to businesses, by number, is American Express Bank, Federal Savings Bank (FSB) with approximately 20 percent market share. Therefore, a comparison based on dollar volume of loans is more meaningful.

#### *Non-MSA- Desoto, Glades, Hendry, and Okeechobee Counties*

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

Competition for mortgage loans is strong in the assessment area. As noted earlier, there are a very large number of lenders reporting loans under the HMDA, many of them among the largest mortgage lenders in the United States. Most are mortgage companies and financial institutions that do not take deposits in the assessment area. In 2014, there were twelve financial institutions reporting deposits in the Non-MSA and 149 lenders reporting HMDA loans.

*Home mortgage lending activity is good, when the Bank's deposit market share and rank is compared with its HMDA loan market share and rank when consideration is given to performance context. The Bank's market share of HMDA loan originations in the Non-MSA assessment area is significantly below its deposit market share and near its rank for HMDA loan originations.*

Considering performance context, home mortgage lending activity is adequate. For home purchase loans, SNB's lender market share is significantly below its deposit market share and exceeds its rank. SNB's market share (by number), based on aggregate data from 2014 is 2.41 percent, and the Bank is ranked eleventh of 18 lenders reporting home mortgage loans in the assessment area. For home purchase loans, SNB's market share is significantly below its deposit market share and near its rank. For home improvement loans, SNB's market share is near its deposit market share and near its rank. The Bank's home improvement market share is 16.48 percent and the rank is second of 91 lenders reporting home improvement loans. For refinance loans, both the Bank's loan market share and rank are significantly below its deposit market share and rank. SNB has a refinance loan market share of 2.22 percent (by number) and is ranked fourteenth of 70 lenders reporting refinance loans in the assessment area. The home purchase market is dominated by Wells Fargo Bank, NA, First Bank, JP Morgan Chase Bank, NA, NTFN Incorporated (Inc.), and Centerstate Bank of Florida, NA who rank first, second, third, and fourth, respectively, with a combined market share of approximately 30 percent. For home improvement loans, the market is dominated by SunTrust Bank, Inc., and Seacoast Bank, NA who rank first, and second with a combine market share of approximately 54 percent. For refinance loans, the market is dominated by Wells Fargo Bank, NA, Quicken Loans, Bank of America, NA, and PNC, NA who rank first, second, third, and fourth, respectively, and have a combine market share of approximately 30 percent.

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

FDIC data as of June 30, 2014, shows that SNB had a deposit market share of 20.15 percent and it was ranked first among twelve financial institutions reporting deposits in the assessment area. Using 2014 aggregate data, SNB's lender market share of small loans to businesses was 6.55 percent, based on the dollar amount of loans. The Bank was ranked fifth of 40 lenders reporting small loans to businesses in the assessment area. The comparison is based on the dollar volume of loans rather than the number of loans because of the inclusion of credit card lenders in the reporting of small loans to businesses. Credit card lenders originate a large number of loans, but the dollar volume is significantly smaller. For example, the top five reporters of small loans to businesses in 2014 are credit card lenders that do not take deposits in the assessment area. Combined, these five lenders have a market share of 41 percent based on the number of loans, but only 12 percent based on dollar volume. On an individual basis, the largest originator of small loans to businesses, by number, is American Express Bank, FSB with a 15

percent market share. Because of this situation, a comparison based on dollar volume of lending is more reflective of the Bank's performance.

## **Distribution of Loans by Income Level of the Geography**

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

### ***Home Mortgage Loans***

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

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

Conclusions regarding home mortgage loans are mainly based on performance in moderate-income geographies. In the Port St. Lucie-Ft. Pierce MSA, there is very limited opportunity to lend in the three low-income geographies within the assessment area. According to the 2010 Census, there are only 1,285 owner-occupied housing units (approximately one percent of all owner-occupied units in the assessment area) located in the three low-income geographies and competition for home mortgage lending is very strong, as noted in the Lending Activity discussion.

There are no low-income geographies in the Non-MSA assessment area. CRA performance in distressed and underserved middle-income geographies of Non-MSA assessment areas is also considered in addition to low- and moderate-income geographies. Of the seventeen middle-income geographies in the Non-MSA, sixteen are distressed middle-income geographies due to poverty as well as three of these geographies are also distressed due to high unemployment.

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

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

*The overall geographic distribution of home purchase loans is adequate, given performance context. In low-income geographies, the Bank originated no home purchase loans. In moderate-income geographies, the percentage of the Bank's home purchase loans is below the percentage of owner-occupied housing units in such geographies. The Bank had no market share for home purchase loans in low-income geographies. In moderate-income geographies, the Bank's market share exceeds its overall market share of home purchase loans.*

*The overall geographic distribution of home improvement loans is adequate, given performance context.* In low-income geographies, the Bank originated no home improvement loans. For moderate-income geographies, the Bank's percentage of home improvement loans is below the percentage of owner-occupied housing units in such geographies. The Bank had no market share of home improvement loans in low-income income geographies but its market share of home improvement loans in moderate-income geographies is near its overall market share of home improvement loans.

*The overall geographic distribution of refinance loans is adequate, given performance context.* In low-income geographies, the Bank's percentage of refinance loans is significantly lower than the percentage of owner-occupied housing units in such geographies. In moderate-income geographies, the percentage of the Bank's refinance loans is significantly below the percentage of owner-occupied housing units in such geographies. The Bank had no market share of refinance loans in low-income geographies but its market share of refinance loans in moderate-income geographies is near the Bank's overall market share of refinance loans.

*Non-MSA- Desoto, Glades, Hendry, and Okeechobee Counties*

*Overall, the geographic distribution of home mortgage loans in the Non-MSA assessment area is good, given performance context.* The geographic distribution of home purchase, home improvement, and refinance loans is adequate, given performance context.

*The overall geographic distribution of home purchase loans is good, given performance context.* In moderate-income geographies, the percentage of the Bank's home purchase loans is near to the percentage of owner-occupied housing units in such geographies. The Bank's market share of home purchase loans in moderate-income geographies is near to its overall market share of home purchase loans. For middle-income, the percent of the Bank's home purchase loans exceeds the percentage of owner-occupied housing units. The Bank's market share of home purchase loans in middle-income geographies exceeds its overall market share of home purchase loans.

*The overall geographic distribution of home improvement loans is good, given performance context.* In moderate-income geographies, the percentage of the Bank's home improvement loans is near to the percentage of owner-occupied housing units in such geographies. The Bank's market share of home improvement loans in moderate-income geographies is below its overall market share of home improvement loans. For middle-income, the percent of the Bank's home improvement loans is near the percentage of owner-occupied housing units. The Bank's market share of home improvement loans in middle-income geographies exceeds its overall market share of home improvement loans.

*The overall geographic distribution of home refinance loans is good, given performance context.* In moderate-income geographies, the percentage of the Bank's home refinance loans is near to the percentage of owner-occupied housing units in such geographies. The Bank's market share of home refinance loans in moderate-income geographies is below its overall market share of refinance loans. For middle-income, the percent of the Bank's home refinance loans is near the percentage of owner-occupied housing units. The Bank's market share of home refinance loans in middle-income geographies exceeds its overall market share of home refinance loans.

### ***Small Loans to Businesses***

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

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

Conclusions are based on performance in moderate-income geographies considering there are no or limited low-income geographies in the full scope assessment areas. Opportunities for lending to businesses in the three low-income geographies of the Port St. Lucie-Ft. Pierce assessment area were limited. Only 870 businesses, or 1.76 percent of all the businesses in the assessment area, are located there (based on 2014 Dun and Bradstreet data), and competition for such loans is strong both between banks operating in the area and credit card lenders, as noted in the discussion of Lending Activity.

There are no low-income geographies in the Non-MSA full-scope assessment area. Competition is also strong in this assessment area including banks and credit card lenders, as noted in the discussion of Lending Activity.

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

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

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

#### Non-MSA- Desoto, Glades, Hendry, and Okeechobee Counties

*The geographic distribution of small loans to businesses is good.*

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

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

### ***Lending Gap Analysis***

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

### ***Inside/Outside Ratio***

A substantial majority of SNB's loans are within its overall assessment area. Overall, 98.30 percent by number and 97.30 percent by dollar of SNB's loans are within its assessment area. By loan product, 99.80 percent of the number and 99.21 percent of the dollar volume of HMDA loans, and 96.56 percent by number, and 91.98 percent by dollar of small loans to businesses are inside the Bank's assessment area. This performance had a positive impact on the Bank's overall geographic distribution analysis.

### **Distribution of Loans by Income Level of the Borrower**

#### **Distribution of Loans by Income Level of the Borrower**

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

#### ***Home Mortgage Loans***

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

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

During the evaluation period, economic recovery from the recession was sluggish but improvement was evident with a decline in foreclosures, an increasing trend in property values, increasing availability of jobs and a decline in unemployment, and a decrease in residential foreclosures. Banks maintained tightened underwriting standards and the availability of subsidy programs and special mortgage loan programs were limited. These factors made it difficult for low- and even some moderate-income individuals and families to own a home. According to the Florida Housing Data Clearing House (FHDC), the median sales price of a home in St. Lucie County was \$138,000 and \$260,000 in Martin County. The HUD adjusted median family income level in 2014 for the MSA was \$56,900. Estimated annual income for low-income people would be less than \$28,450 (less than 50% of the median income) and less than \$45,520 for moderate-income people (less than 80% of the median). The high costs of property taxes and insurance add to the difficulty of low-income people purchasing a home without a subsidized loan. In addition, the demand for refinance loans by low-income families is generally very limited. Many times low-income families have taken advantage of various subsidy programs and special mortgage products that have very low interest rates that would not make it necessary for them to refinance for a lower interest rate. Also, some special programs do not allow for refinancing.

The Non-MSA is rural and has experienced similar economic conditions as Martin and St. Lucie Counties. The same factors made it difficult for low- and even some moderate-income individuals and families to own a home. According to FHDC, the median sales price of a home in the respective counties of the Non-MSA assessment area are Desoto County at \$94,500, Glades County at \$107,500, Hendry County at \$81,250, and Okeechobee at \$93,000. The HUD adjusted median family income

level in 2014 for all the counties in the Non-MSA was \$48,700. Estimated annual income for low-income people would be less than \$24,350 (less than 50% of the median income) and less than \$38,960 for moderate-income people (less than 80% of the median). The high costs of property taxes and insurance add to the difficulty of low-income people purchasing a home without a subsidized loan. For further discussion on performance context issues, please see the Market Profile in Appendix B.

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

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

*The overall borrower distribution of home purchase loans is good, given performance context.* The percentage of home purchase loans to low-income borrowers is significantly lower than the percent of low-income families in the assessment area but good given the high poverty level of the MSA and the difficulty for low-income people to obtain a home mortgage loan without the help of a subsidy program. The Bank's market share of home purchase loans to low-income borrowers is near to its overall market share of home purchase loans. The percent of home purchase loans to moderate-income borrowers is below the percent of moderate-income families in the assessment area and the Bank's market share of home purchase loans to moderate-income borrowers is below its overall market share of home purchase loans. This lower level of lending is attributed to limited subsidized lending, the general tightening of loan underwriting standards at all banks, as well as competition in the market. This level of lending is considered good given these challenges.

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

*The overall borrower distribution of refinance loans is adequate, given performance context.* The percentage of the Bank's refinance loans to low-income borrowers is significantly lower than the percentage of low-income families in the assessment area but adequate given the limited ability of low-income people who already have a subsidized mortgage to refinance. The Bank's market share of refinance loans to low-income borrowers is near its overall market share of refinance loans. The percent of refinance loans to moderate-income borrowers is below the percentage of moderate-income families in the assessment area. The Bank's market share of refinance loans to moderate-income borrowers is below its overall market share of refinance loans.

Non-MSA- Desoto, Glades, Hendry, and Okeechobee Counties

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

*The overall borrower distribution of home purchase loans is good, given performance context.* The percentage of home purchase loans to low-income borrowers is significantly lower than the percent of low-income families in the assessment area but good given the high poverty level of the MSA and the difficulty for low-income people to obtain a home mortgage loan without the help of a subsidy program. However, the Bank's market share of home purchase loans to low-income borrowers is near to its overall market share of home purchase loans. The percent of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families in the assessment area and the Bank's market share of home purchase loans to moderate-income borrowers is near to its overall market share of home purchase loans.

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

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

### ***Small Loans to Businesses***

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the Bank's origination/purchase of small loans to businesses.

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

*The borrower distribution of small loans to businesses is good considering the percent of loans to small businesses and the size of the Bank's loans.* The percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) is below the percentage of such businesses in the assessment area. The Bank's market share of loans to small businesses is below its market share of loans to all businesses. In addition, 76 percent of the Bank's small loans to businesses are for amounts of \$100,000 or less, indicating such loans are meeting the needs of smaller businesses.

#### *Non-MSA- Desoto, Glades, Hendry, and Okeechobee Counties*

*The borrower distribution of small loans to businesses is good considering the percent of loans to small businesses and the size of the Bank's loans.* The percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) is below the percentage of such businesses in the assessment area. The Bank's market share of loans to small businesses is near its market share of

loans to all businesses. Furthermore, 76 percent of the Bank's small loans to businesses are for amounts of \$100,000 or less, indicating such loans are meeting the needs of smaller businesses.

## **Community Development Lending**

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the Bank's level of community development lending.

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

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

During the evaluation period, SNB made 23 CD loans, totaling \$11.9 million. Of the total, 17 were for services targeted toward low- and moderate-income people, and three were to meet affordable housing needs in the Port St. Lucie-Ft. Pierce MSA. These loans are responsive to the need for affordable rental housing for low- and moderate-income individuals, services for the increasing number of people and families experiencing poverty, and stabilization needs noted as needs of the assessment area

### *Non-MSA- Desoto, Glades, Hendry, and Okeechobee Counties*

In the Non-MSA assessment area, SNB originated six community development loans totaling \$7.6 million during the evaluation period providing valuable services for low- and moderate-income people. These loans provided working capital to non-profit organizations that assist disadvantaged youths and senior citizens.

## **Product Innovation and Flexibility**

Overall, product innovation and flexibility had a positive impact on the Lending Test. Product innovation and flexibility had a positive impact on the Lending Test. The Bank offered several home mortgage loan products to low- and moderate-income people. Loans noted here were included in the geographic distribution and borrower distribution analysis already discussed.

### **Federal Housing Administration (FHA)**

SNC offers FHA mortgage loans, including the 203K purchase/rehabilitation product throughout its assessment areas. The product allows for a flexible source of funds for down payment and/or closing costs, expanded ratios, non-traditional credit history, and seller contributions. The Bank originated or purchased 536 loans totaling \$79 million.

### **Neighborhood Stabilization Program (NSP)**

The NSP was established for stabilizing communities that have suffered from foreclosures and abandonment. The program provides grants to all states for the purchase and redevelopment of foreclosed and abandoned homes. SNB originated 25 loans totaling \$1.6 million.

### **Veterans Administration (VA)**

This loan program features fixed payments on a 30 or 15-year term guaranteed by the Department of Veteran Affairs. Loans may be up to 100 percent loan to value based upon the lesser of the reasonable value of the property or the purchase price, whichever is less, plus the funding fee. All veterans must qualify, for they are not automatically eligible for the program. This loan program features regularly amortizing fixed rate mortgages of 30 or 15 years insured by the Department of Housing and Urban Development. Loans are assumable but the borrower must qualify. SNB originated or purchased 145 loans totaling \$32.4 million.

### **United States Department of Agriculture (USDA) Rural Development**

The Guaranteed Rural Housing Loan Program is offered through the Rural Housing Service (RHS), an agency of the U.S. Department of Agriculture. The program offers assistance to low- and moderate-income rural residents whose income is equal to or less than 115 percent of the area median income. During the evaluation period, SNB originated two loans totaling \$330 thousand under the program.

### **State Small Business Credit Initiative (SSBCI)**

Created as part of the Small Business Jobs Act of 2010, the SSBCI is managed by the U.S. Treasury Department to help states either strengthen existing loan and equity programs or create new programs. SSBCI is a loan and venture capital program designed to leverage private capital for Florida's small businesses. SNB originated five loans totaling \$5.4 million.

### **Small Business Administration (SBA) 504**

SBA 504 loans offer longer terms and fixed rates, which makes them a good option when purchasing major assets such as land, buildings, major machinery and equipment, or when planning extensive renovations. The SBA 504 loan provides up to 90 percent total financing, fixed rate for 20 years on the SBA portion of the loan, higher loan amounts, enhanced business cash flow and liquidity preservation, low down payment (as low as 10 percent), predictable monthly payment, and no balloon payment (on SBA portion of the loan). SBA 504 loan recipients must be existing, for-profit businesses with an average 2-year net worth of \$15 million or less and with after-tax profits of less than \$5 million. Owner/user of the project being financed must occupy at least 51 percent of the property. SBA 504 maximum loan amount is \$5 million and can be used to buy land and buildings, finance major renovations and purchase machinery and equipment. SNB finances 50 percent of the total project cost. The Community Development Corporation (CDC), through the SBA, finances 40 percent of the project up to \$5 million. Owner must provide a minimum 10 percent down payment in the project. SNB will hold the first mortgage on real estate and/or a secured interest in equipment and machinery, and the SBA will hold the second mortgage on real estate or the second secured interest in equipment and machinery. SNB originated two loans totaling \$747 thousand and purchased five loans totaling \$5.4 million with the recent acquisition of BankFIRST

**SBA 7(a)**

SBA 7(a) is the most commonly used government-guaranteed loan program. This type of loan gives small- to medium-sized businesses access to non-traditional sources of capital. The loan offers up to 90 percent total project financing, minimal down payment, easy application process, longer repayment terms, broad eligibility, and no balloon payments. SBA 7(a) loan recipients are for-profit small businesses with good credit and track record of sufficient cash flow, including manufacturing, wholesale, retail and service businesses as well as independent and franchise businesses. Borrowers can access a credit facility up to \$5 million. The SBA provides an 85 percent guarantee to SNB on loan amounts of \$150,000 or less and a 75 percent guarantee on amounts of \$150,000 or more. The amount of collateral needed depends on the total amount of the loan as well as cash flow, liquidity and assets of the business. In addition, the SBA requires SNB to take a secured interest in business assets. The loan terms vary depending on how the proceeds are used. Loans for working capital have terms up to seven years, loans for equipment up to 10 years (or remaining useful life of equipment), and loans for real estate purchase up to 25 years. SNB originated 28 loans totaling \$6.5 Million and purchased 79 loans totaling \$16.8 million with the recent acquisition of BankFIRST.

**Florida Hardest Hit**

For Loss Mitigation, the Bank participated in the Florida Hardest Hit Program and assisted a total of 20 clients in either their principal reduction program and reamortized the remaining payments to reduce their monthly payment or the monthly payment program that provided payment relief for these individuals to preserve their home ownership. These loans are not HMDA reportable.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the Bank's performance under the Lending Test in all the limited-scope assessment areas except the MD 48424 Palm Beach County are not inconsistent with the Bank's overall "Outstanding" performance under the Lending Test. MD48424 Palm Beach County was weaker but performance was good. Refer to Tables 1 through 12 in Appendix C for the facts and data that support these conclusions.

**INVESTMENT TEST****Conclusions for Areas Receiving Full-Scope Reviews**

The Bank's performance under the investment test is rated "High-Satisfactory", considering the positive impact of some limited-scope assessment areas and the limited opportunities in the assessment areas. Based on full-scope reviews, the Bank's performance in the Port St. Lucie-Ft. Pierce assessment area is good and in the Okeechobee, Hendry, Desoto, and Glades assessment area is adequate considering the performance context.

Refer to Table 14 for the facts and data used to evaluate the Bank's level of qualified investments.

During this evaluation period, the Bank made an approximately \$11.3 million investment in CRA qualified investment funds. The investments are backed by multiple mortgages on properties that are helping to provide affordable housing to low- and moderate-income residents in the Bank's assessment areas. Additionally, the investment includes Small Business Administration loans that provide economic development by financing small business.

Overall, the Bank's community development investments are highly responsive to the assessment area needs, primarily addressing the need for affordable housing for low- and moderate-income individuals and economic development by financing small business. Affordable housing needs are considered critical throughout the overall MSA assessment area. Generally, investments are not considered innovative or complex and private investors routinely provide these types of qualified investments. However, one of the Bank's investments, Sumter Gardens, is an Equity Investment where the Bank is the LIHTC (Low Income Housing Tax Credit) investor as well as providing the Letters of Credit for construction and operations during lease up of the complex. This type of investment is not typical for community banks and is usually an investment vehicle for large regional banks. Given the smaller size of this facility, the developer could not locate a larger regional partner interested in this investment.

MSA 38940 (Martin and St Lucie Counties)

Investment performance in Martin/St Lucie Counties is good when considering the impact of the MSA investment. Investment funded amount totaled \$3.15 million. This investment includes \$2.3 million in a CRA investment fund through Community Capital Management. This current-period investment primary consists of Fannie Mae and Freddie Mac loan pools comprised of loans made to low- and moderate-income borrowers for affordable housing. The impact of the investment is taken into consideration when reaching conclusions about performance in this assessment area. Additionally, the Bank has a prior period investment in MBS with a current balance of \$550 thousand, which provides affordable housing for low- and moderate- income borrowers. Donations totaling \$292 thousand were to 40 organizations whose primary purpose meets the definition of community development.

Affordable housing needs are considered the most important in the assessment area and investments are highly responsive to those needs. Additionally, the Bank is responsive to the needs of the local community as it provides charitable donations to low- and moderate-income individuals and families. Investments are not considered innovative or complex and private investors routinely provide these types of qualified investments.

Non-MSA (Okeechobee, Hendry, Desoto, and Glades Counties)

Investment performance in Okeechobee, Hendry, Desoto, and Glades Counties is adequate when considering the impact of the MSA investment. Investment amount totaled \$139 thousand and consist of a prior-period investment in a Ginnie Mae MBS pool with a current balance of \$43 thousand, which provides affordable housing for low- and moderate- income borrowers. Donations totaling \$96 thousand, or 17 donations, were to 15 organizations whose primary purpose meets the definition of community development.

## Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the Bank's performance under the Investment Test in the MD 48424 (Palm Beach County), MSA 36740 (Seminole, Orange, Osceola, Lake Counties), and MSA 42700 (Highlands County) assessment areas was stronger than the Bank's overall "High Satisfactory" rating and the performance of those assessment areas had a positive impact on the overall rating. The Bank's dollar volume of investment was significant for these areas. Performance in MSA 42680 (Indian River County), MSA 19660 (Flagler and Volusia Counties), the MSA 37340 (Melbourne-Titusville-Palm Bay, FL), and MSA 37340 (Brevard County) was weaker than the Bank's overall high satisfactory performance. The weaker performance in these areas is attributed to limited investment opportunities, as well as the Bank's short operating experience in MSA 19660. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The Bank's performance under the Service Test is rated "Outstanding". Based on a full-scope review, the Bank's performance in the Port St. Lucie-Ft. Pierce assessment area is excellent. Based on a full-scope review, performance in the Non-MSA assessment area is good, given community development services. Delivery systems are readily accessible to geographies and individuals of different income levels.

### Retail Banking Services

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

The Bank's retail service delivery systems are excellent and readily accessible to geographies and individuals of different income levels. Products, services, and business hours are reasonable and are comparable among branch locations regardless of the income level of the geography. As of November 23, 2015, the Bank has a total of 44 offices in its assessment areas. The distribution of the branches are as follows:

- One (1) in low income
- Twelve (12) moderate income
- Twenty Three (23) middle income
- Eight (8) in upper income geographies

Branch locations are augmented by a variety of alternative delivery systems including ATMs, deposit accepting ATMs, telephone banking, online and mobile banking with bill pay service for certain consumers. In addition to the branch offices, Seacoast has five commercial banking centers available to serve their commercial banking clients located in Winter Park, Bayhill, Lake Mary, Fort Lauderdale, and Boca Raton. Seacoast partners with Presto Network to offer fee-free access to Publix ATMs with no fee from either Seacoast or Presto.

A wide range of banking products and services are offered throughout the assessment areas. Some of the products and services include free personal and business checking, personal online banking, digital deposit, remote deposit capture (RDC), savings accounts, and personal mobile enrollment. In the full-scope Port St. Lucie-Ft. Pierce assessment area, the Bank opened approximately 6,476 free personal checking accounts and 389 free business checking accounts to low- and moderate-income (LMI) households. In the Non-MSA assessment area, there were 3,134 free personal checking accounts and 86 free business checking accounts opened for LMI households.

MSA 38940 (Martin and St Lucie Counties)

*Branches are readily accessible in the full-scope Port St. Lucie-Ft. Pierce assessment area.* There are 13 branches located in this assessment area. There are no branches located in low-income geographies however only 2.29 percent of the 424,107 persons residing in the assessment area (based on the 2010 Census) live in low-income geographies in the assessment area. There are five branches located in a moderate-income geography, four are in middle-income geographies, and four are in upper-income geographies. The percent of branches in moderate-income geographies exceeds the percent of population residing in moderate-income geographies. The Bank provides excellent accessibility to residents of the moderate-income geographies in the full-scope Port St. Lucie-Ft. Pierce assessment area.

The Bank opened one branch and closed three branches during the evaluation period in this assessment area. The two branches that were closed (Hutchinson Island and East Ocean) were consolidated to the new branch (Sewall's Point). The Jensen West branch closing was consolidated into the Jensen Beach branch. These branch closings did not negatively affect the overall accessibility of delivery systems in the full-scope assessment area. The branch closings had a neutral impact on branch distribution.

Non-MSA (Okeechobee, Hendry, Desoto, and Glades Counties)

*Branches are reasonably accessible in the full-scope Okeechobee, Hendry, Desoto, and Glades assessment area.* There are no low-income geographies in this assessment area. There is one branch located in a moderate-income geography and five branches located in middle-income geographies. About 34 percent of the 126,882 persons residing in the assessment area (based on 2010 Census) live in moderate-income geographies. About 83 percent of the Bank's branches are in middle-income geographies where 56 percent of the population resides. Four of the branches are in distressed middle-income geographies.

No branches were opened, but one was closed. This branch in Hardee County was closed due to unprofitability and low level of deposits and loans. Hardee County was part of the Non-MSA assessment area but was taken out of the Bank's assessment area in December 2012. We did not include it in the assessment area because of the short time it was part of the evaluation period and analysis of data would not be meaningful. This had a neutral impact on the retail portion of the Service Test.

## **Community Development Services**

Considering the level of participation and the number of organizations and individuals benefiting, the overall level of community development services is excellent. The Bank provides a relatively high level of community development services throughout the full-scope assessment areas that are responsive to assessment area needs, particularly those related to financial literacy, community service, training, and

affordable housing. Although the services are not innovative, they are responsive to assessment area needs.

The Bank's provision of community development services in the full-scope Martin and St Lucie MSA assessment area is excellent and good in the Non-MSA full-scope assessment area.

MSA 38940 (Martin and St Lucie Counties)

The Bank took on a lead role providing community development services in Martin-St Lucie County and provided an excellent level of assistance to organizations that support services targeted to low- and moderate-income people. During the evaluation period, Bank records indicate that Bank employees spent about 2,000 hours on community development services conducted through 24 different organizations that help to provide affordable housing opportunities, economic development, and community services to low- and moderate-income individuals and families. Bank employees provided technical assistance to non-profit organizations by serving as board and committee members, volunteers, and providing technical assistance.

The Community Lending Officer educates groups of interested borrowers, strategic referral sources, local governmental agencies, interest groups, and retail banking partners on the opportunities and processes necessary for home ownership. The focus of this position is primarily on low to moderate borrowers and community lending programs, assisting LMI borrowers, and being the in-market point person with non-profit housing partners. Coordinated by the Community Lending Officer, the Bank conducted multiple seminars, individual counseling sessions, and Neighborhood Stabilization Program (NSP) applications serving in total about 2,475 persons. The Bank's portion of the seminars focus on financial education, such as credit repair, money management, and financial literacy.

Examples of organizations that SNB frequently provides community development services includes MC Habitat for Humanity, an organization focused on creating affordable housing opportunities for low and moderate income individuals and families. Martin County and St Lucie Lending Consortium, which primary serves low- and moderate-income households.

Non-MSA (Okeechobee, Hendry, Desoto, and Glades Counties)

The Bank provided a good level of assistance to organizations that support services targeted to low- and moderate-income people in the Non- MSA full-scope assessment area. During the evaluation period, Bank records indicate that bank employees spent about 158 hours on community development services conducted through four different organizations that help to provide affordable housing opportunities and community services to low- and moderate-income individuals and families. Bank employees provided technical assistance to non-profit organizations by serving as board members, volunteers, and providing financial expertise.

Coordinated by the Community Lending Officer, the Bank conducted four seminars with 91 participants and individual counseling sessions serving 17 persons. The Bank's portion of the seminars focus on financial education, such as credit repair, money management, and financial literacy.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the Bank's performance under the Service Test in the Orange-Seminole- Osceola- Lake MSA, Highlands MSA, and Indian River MSA assessment areas was not

inconsistent with the Bank's overall "outstanding" performance under the Service Test in FL. The Bank's performance under the Service Test in Palm Beach MSA, Flagler-Volusia MSA, and Brevard MSA was good but weaker than the Bank's overall performance. Palm Beach and Flagler had limited branch distribution during the evaluation period with acquired branches added later in the evaluation period. Acquired branches are not considered openings. Brevard had a limited branch distribution. Performance in the limited-scope assessment areas had a positive impact on the overall Service Test conclusion.

## 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): (01/01/12 to 09/30/15) Investment and Service Tests and CD Loans: (10/19/2012 to 11/30/2015)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
Seacoast National Bank Stuart, FL	HMDA, Small Business, and community development loans. Flexible and innovative products.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
<b>Not Applicable</b>		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
MSA 38940 (Port St. Lucie-Ft. Pierce, FL)- Martin and St Lucie Counties	Full-Scope	
Non-MSA- Desoto, Glades, Hendry, and Okeechobee Counties	Full-Scope	
MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL)-Broward County	Limited-Scope	
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)- Palm Beach County	Limited-Scope	
MSA 19660- Flagler and Volusia Counties	Limited-Scope	
MSA 36740 (Orlando-Kissimmee, FL)-Orange, Lake, Orange, Osceola, and Seminole Counties	Limited Scope	
MSA 37340 (Palm Bay-Melbourne- Titusville, FL)- Brevard County	Limited Scope	
MSA 42680 (Sebastian-Vero Beach, FL)- Indian River County	Limited-Scope	
MSA 42700- Highlands County	Limited-Scope	

## Appendix B: Market Profiles for Full-Scope Areas

### MSA 38940 Martin-St Lucie Counties

Demographic Information for Full Scope Area: MSA 38940 Martin-St Lucie Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	79	3.80	24.05	44.30	25.32	2.53
Population by Geography	424,107	2.29	19.63	55.65	22.43	0.00
Owner-Occupied Housing by Geography	125,403	1.02	14.71	57.46	26.81	0.00
Business by Geography	49,536	1.76	18.59	52.93	26.61	0.11
Farms by Geography	1,767	1.47	21.00	52.29	25.24	0.00
Family Distribution by Income Level	108,932	18.62	20.11	20.32	40.95	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	42,189	4.47	23.99	56.71	14.84	0.00
Median Family Income		56,832	Median Housing Value	217,917		
HUD Adjusted Median Family Income for 2014		56,900	Unemployment Rate (2010 US Census)	5.02%		
Households Below Poverty Level		11%				

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 US Census and 2014 HUD updated MFI

MSA 38940 is comprised of two counties, Martin and St. Lucie Counties. St. Lucie is the larger of the two counties, with 66 percent of the total MSA population. All of the low-income (3) and 68 percent of the moderate-income (13) geographies in the MSA are located in St. Lucie County, primarily in Ft. Pierce. The city of Ft. Pierce has a population of approximately 41,400. During the evaluation period, Ft. Pierce had a high level of households below poverty level at approximately 36 percent. The MSA level of households below the poverty level was at 11 percent. Other major cities in the MSA include Stuart and Port St. Lucie.

According to the Florida Housing Data Clearing House (FHDC), the median sales price of a home in St. Lucie County was \$138,000 and \$260,000 in Martin County. The HUD adjusted median family income level in 2014 for the MSA was \$56,900. Estimated annual income for low-income people would be less than \$28,450 (less than 50% of the median income) and less than \$45,520 for moderate-income people (less than 80% of the median). The high costs of property taxes and insurance add to the difficulty of low-income people purchasing a home without a subsidized loan. Even some moderate-income people or families could have difficulty without the use of special programs

Local economic conditions indicate improving trends during the evaluation period considering slow recover following the recession. During the evaluation period, the state of Florida consistently ranks among the top five states in the nation for the number of home foreclosures, ranking first in May 2015. There has been some reduction in foreclosures but they remain high. The foreclosure rate in Martin County is one in every 1,409 housing units and 1 in every 1,256 housing units for St Lucie County. Many financial institutions worked through high levels of foreclosures in the residential markets and reducing problem commercial real estate loans. Jobs prospects show improving trends. The unemployment rate for Martin County was 5.7 percent in 2015 with a high of 8.8 percent in 2012. For

St. Lucie County it was six percent in 2015 with a high of 12.3 percent in 2012. This indicates a need for activities that support job creation, job placement and training programs, as well as community services for low- and moderate-income people and families.

The top five employers headquartered in Martin County include Martin Health Systems, Paradigm Precision, Triumph Aerostructures-Vought Aircraft Division, Liberator Medical Supply and Seacoast National Bank.

The top five employers in St. Lucie County include School Board of St. Lucie County, Indian River State College, Lawnwood Regional Medical Center and Heart Institute, City of Port St. Lucie, and Convey Health Solutions.

Despite continued consolidation of financial institutions, competition for financial services remained strong in the MSA. There were 20 different financial institutions operating 128 branches in the MSA (as of June 30, 2014), including national, regional, and community banks and savings and loan associations. The number of institutions further reduced to 19 financial institutions with 123 branches as of June 30, 2015. In addition, mortgage companies and credit card lenders compete for loans in the assessment area. Their numbers far exceed the number of financial institutions operating in the assessment area.

There were opportunities for community development lending, investments, and services throughout the MSA during the evaluation period and larger institutions are competitive for the qualified investments that are available. Community development opportunities include providing technical assistance and financing to the several organizations whose mission is to provide affordable housing. Some of this activity was funded through grants from the Neighborhood Stabilization Program (NSP) offered by the Department of Housing and Urban Development (HUD) prior to 2012. Both counties in the MSA received NSP funding prior to 2012; however, there was no NSP funding provided in 2012, 2013, 2014 or 2015 to MSA. Community development loan opportunities exist for bridge financing to help meet these needs as well as those of community development service organizations. The State of Florida has designated an Enterprise Zone in Ft. Pierce that targets economic development with the purpose of stimulating and retaining jobs. There are also multiple Community Redevelopment Areas in the MSA that are targeted for revitalization, which provides an opportunity for community development lending.

Community development investments opportunities exist but competition is strong for these investments. Mortgage-backed securities are an option. SBA loan-backed securities are also available. Low Income Housing Tax credits remain available but they are generally complex for community banks and their viability depends on the financial condition of the Bank. There are state and regional community development financial institutions (CDFI's) and private equity organizations that need support for their community development activities. Opportunities exist to contribute to qualified non-profit organizations whose mission meets the definition of community development, particularly in the areas of job training and job placement.

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

## Non MSA Desoto-Glades-Hendry-Okeechobee Counties

Demographic Information for Full Scope Area: NonMSA Desoto- Glades- Hendry- Okeechobee Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	29	0.00	31.03	58.62	10.34	0.00
Population by Geography	126,882	0.00	34.53	56.55	8.92	0.00
Owner-Occupied Housing by Geography	29,957	0.00	30.20	61.64	8.16	0.00
Business by Geography	8,349	0.00	28.66	62.52	8.82	0.00
Farms by Geography	843	0.00	29.42	58.01	12.57	0.00
Family Distribution by Income Level	28,516	23.60	20.77	19.86	35.77	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	12,652	0.00	41.34	53.94	4.72	0.00
Median Family Income		46,196	Median Housing Value	126,719		
HUD Adjusted Median Family Income for 2014		48,700	Unemployment Rate (2010 US Census)	5.03%		
Households Below Poverty Level		19%				

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

Source: 2010 US Census and 2014 HUD updated MFI

The Non-MSA is rural and consists of Desoto, Glades, Hendry, and Okeechobee Counties. The Non-MSA has experienced similar economic conditions as Martin and St. Lucie Counties during the evaluation period. The same factors made it difficult for low-income and even some moderate-income individuals and families to own a home. The Non-MSA had 16 distressed geographies due to high poverty levels and three of the 16 geographies were distressed from high unemployment.

According to FHDC, the median sales price of a home in the respective counties of the Non-MSA assessment area are Desoto County at \$94,500, Glades County at \$107,500, Hendry County at \$81,250, and Okeechobee at \$93,000. The HUD adjusted median family income level in 2014 for all the counties in the Non-MSA was \$48,700. Estimated annual income for low-income people would be less than \$24,350 (less than 50% of the median income) and less than \$38,960 for moderate-income people (less than 80% of the median). The high costs of property taxes and insurance add to the difficulty of low-income people purchasing a home without a subsidized loan. The Non-MSA experienced a high level of households below the poverty level of 19 percent.

Despite continued consolidation of financial institutions, competition for financial services remained strong in the Non-MSA. There are 12 different financial institutions operating 27 branches in the MSA (as of June 30, 2014), including national, regional, and community banks and savings and loan associations. The number of institutions further reduced to 11 financial institutions with 24 branches as of June 30, 2015. In addition, mortgage companies and credit card lenders compete for loans in the assessment area. Their numbers far exceed the number of financial institutions operating in the assessment area.

### *Desoto County*

Desoto County is adjacent to Highlands and Glades Counties. The unemployment rate is 9.5 percent and ranged from a low of 5.4 percent to a high of 11.7 percent. Twenty-one percent of the households in the County lived below the poverty level. All five of the middle-income geographies in the County were distressed due to poverty. The home foreclosure rate is one in every 1,618 housing units. The top five

employers include Wal-Mart Distribution, Wal-Mart, Desoto Memorial Hospital, Peace River Citrus Processing, and Bethel Farms. Economic resources are citrus groves, phosphate, and cattle.

### *Glades County*

Glades County is located in south central Florida on the western bank of Lake Okeechobee. Lake Okeechobee is the largest fresh water lake in Florida and adds tremendous value to the quality of life in Glades County. Largely an agricultural community, Glades County utilizes its natural resources of Lake Okeechobee and the Caloosahatchee River in the production of citrus, sugar cane and cattle, as well as recreational activities including fishing, boating, and bird watching. Glades County's largest employer, The GEO Group Inc., the world's leading provider of correctional and detention management and community reentry services to federal, state and local government agencies. The Glades County Government and the Glades County School District are among the other top employers. The County's unemployment rate is 8.5 percent with a high of 9.70 percent during the evaluation period. Seventeen percent of the households live below the poverty level. Two of the three middle-income geographies were distressed due to poverty. The home foreclosure rate is one in every 659 housing units.

### *Hendry County*

Hendry County is an agricultural community located on the southwestern shore of Lake Okeechobee. The southernmost area of Hendry County backs up to the saw grass marshes of the Florida Everglades. Hendry County's agricultural community utilizes over 72 percent of the land to support its main production of citrus, sugar, and fresh vegetables. Annual festivals of all kinds, including nationally renowned fishing tournaments, showcase Hendry's natural beauty, which is evident in the flora and fauna seen daily. The largest employer in Hendry County is the United States Sugar Corporation. US Sugar is one of the nation's largest producers of sugar cane, orange juice products and a regional short-line railroad operator. Coming in second is the Hendry County School District. The unemployment rate was 11.0 percent with a high of 17.4 percent during the evaluation period. Twenty-one percent of the households live below the poverty level. Three of the four middle-income geographies are distressed due to unemployment and poverty. The home foreclosure rate is one in every 1,016 housing units.

### *Okeechobee County*

Okeechobee is a rural county on the northern shore of Lake Okeechobee. The Treasure Coast counties of St. Lucie and Martin, as well as Palm Beach to the east influence its real estate market. The county is a popular winter destination, and thousands of seasonal residents appear in November-December every year. The county's job base is concentrated in the service-providing industries of education and health care, retail trade, tourism, and government, including a large number of workers at correctional institutions. Agriculture, mainly beef cattle and dairy, accounts for about 15 percent of the county's jobs. Per capita income is lower in Okeechobee than in counties to the east and lower than in Florida statewide. So is the cost of living. Top employers include the School District, Sherriff's Office, and Okeechobee County. The County had an unemployment rate of 10 percent with a high of 11.4 percent during the evaluation period. All six of the middle-income geographies are distressed from poverty. Seventeen percent of the households live below the poverty level. The home foreclosure rate is one in every 616 housing units.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

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

**Institution ID:** SEACOAST NATIONAL BANK

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: FLORIDA												
Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2015												
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
MSA 38940 Martin-St Lucie Counties	43.08	2,274	395,579	594	67,784	4	295	0	11,910	2,872	463,658	43.93
NonMSA Desoto- Glades-Hendry- Okeechobee Counties	43.95	142	8,679	101	9,869	20	1,902	0	7,601	269	20,450	9.75
<b>Limited Review:</b>												
MD 22744- Broward County	1.49	39	10,859	60	19,259	0	0	8	14,861	107	30,118	0.00
MD 48424- Palm Beach County	9.85	386	133,869	264	49,226	6	223	7	0	663	183,318	9.87
MSA 19660- Flagler-Volusia Counties	1.43	41	8,525	53	9,315	1	100	1	0	96	20,220	2.46
MSA 36740-Lake-Orange-Osceola-Seminole	16.13	496	160,671	579	119,326	0	0	11	0	1,07586	279,9975	16.65
MSA 37340 Brevard County	11.060	594	147,188	142	26,591	1	50	3	05	740	173,829	7.32
MSA 42680- Indian River County	12.66	655	115,603	189	22,830	0	0	4	09	848	138,433	8.94
MSA 42700- Highlands County	0.38	15	2,516	10	1,039	0	0	1	0	25	43,555	1.08

**Institution ID:** SEACOAST NATIONAL BANK

\* Loan Data as of September 30, 2015. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 19, 2012 to November 30, 2015.

\*\*\* Deposit Data as of June 30, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE															Geography: FLORIDA		Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2015				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>										
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Over all	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
MSA 38940 Martin-St Lucie Counties	1,730	48.77	1.02	0.00	14.71	7.57	57.46	46.18	26.81	46.24	5.37	0.00	6.97	3.83	8.34						
NonMSA Desoto- Glades-Hendry- Okeechobee Counties	60	1.69	0.00	0.00	30.20	21.67	61.64	68.33	8.16	10.00	2.41	0.00	2.34	2.71	0.00						
<b>Limited Review:</b>																					
MD 22744- Broward County	21	0.59	1.73	0.00	27.32	9.52	37.11	33.33	33.84	57.14	0.03	0.00	0.02	0.01	0.06						
MD 48424- Palm Beach County	301	8.49	2.96	0.33	22.08	4.98	36.12	37.21	38.83	57.48	0.43	0.00	0.00	0.51	0.52						
MSA 19660- Flagler-Volusia Counties	31	0.87	1.08	0.00	14.00	6.45	58.30	38.71	26.62	54.84	0.10	0.00	0.00	0.07	0.18						
MSA 36740-Lake-Orange-Osceola-Seminole	388	10.94	0.48	0.00	20.03	7.47	43.78	28.87	35.71	63.66	0.17	0.00	0.05	0.10	0.28						
MSA 37340 Brevard County	536	15.11	1.18	0.19	18.83	9.70	46.92	31.34	33.06	58.77	1.39	0.00	0.89	1.10	1.93						
MSA 42680- Indian River County	475	13.39	1.08	0.42	11.88	6.53	58.73	56.63	28.31	36.42	5.02	9.52	5.02	4.50	6.09						
MSA 42700- Highlands County	5	0.14	0.00	0.00	7.17	0.00	80.12	100.00	12.71	0.00	0.00	0.00	0.00	0.00	0.00						

<sup>\*</sup> Based on 2014 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2015				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*													
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp									
<b>Full Review:</b>																								
MSA 38940 Martin-St Lucie Counties	166	48.97	1.02	0.00	14.71	9.04	57.46	59.64	26.81	31.33	10.27	0.00	6.98	9.69	13.13									
NonMSA Desoto- Glades-Hendry- Okeechobee Counties	48	14.16	0.00	0.00	30.20	27.08	61.64	56.25	8.16	16.67	16.48	0.00	6.90	22.64	11.11									
<b>Limited Review:</b>																								
MD 22744- Broward County	7	2.06	1.73	0.00	27.32	0.00	37.11	28.57	33.84	71.43	0.10	0.00	0.00	0.00	0.23									
MD 48424- Palm Beach County	25	7.37	2.96	0.00	22.08	20.00	36.12	44.00	38.83	36.00	0.85	0.00	0.53	0.88	0.99									
MSA 19660- Flagler-Volusia Counties	1	0.29	1.08	0.00	14.00	0.00	58.30	0.00	26.62	100.00	0.00	0.00	0.00	0.00	0.00									
MSA 36740-Lake-Orange-Osceola-Seminole	22	6.49	0.48	0.00	20.03	9.09	43.78	22.73	35.71	68.18	0.16	0.00	0.00	0.12	0.27									
MSA 37340 Brevard County	7	2.06	1.18	0.00	18.83	0.00	46.92	28.57	33.06	71.43	0.38	0.00	0.00	0.43	0.51									
MSA 42680- Indian River County	58	17.11	1.08	0.00	11.88	8.62	58.73	65.52	28.31	25.86	8.40	0.00	0.00	8.75	12.90									
MSA 42700- Highlands County	5	1.47	0.00	0.00	7.17	0.00	80.12	100.00	12.71	0.00	1.22	0.00	0.00	1.64	0.00									

\* Based on 2014 Peer Mortgage Data -- US and PR

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE															Geography: FLORIDA		Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>										
	#	% of Total <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp						
<b>Full Review:</b>																					
MSA 38940 Martin-St Lucie Counties	373	50.68	1.02	0.27	14.71	4.83	57.46	47.99	26.81	46.92	1.37	0.00	0.97	1.05	2.17						
NonMSA Desoto- Glades-Hendry- Okeechobee Counties	34	4.62	0.00	0.00	30.20	29.41	61.64	52.94	8.16	17.65	2.22	0.00	1.16	2.50	3.45						
<b>Limited Review:</b>																					
MD 22744- Broward County	10	1.36	1.73	0.00	27.32	0.00	37.11	40.00	33.84	60.00	0.03	0.00	0.00	0.02	0.04						
MD 48424- Palm Beach County	56	7.61	2.96	0.00	22.08	1.79	36.12	30.36	38.83	67.86	0.13	0.00	0.09	0.12	0.15						
MSA 19660- Flagler-Volusia Counties	9	1.22	1.08	0.00	14.00	0.00	58.30	55.56	26.62	44.44	0.00	0.00	0.00	0.00	0.00						
MSA 36740-Lake-Orange-Osceola-Seminole	79	10.73	0.48	1.27	20.03	5.06	43.78	17.72	35.71	75.95	0.09	1.92	0.05	0.06	0.10						
MSA 37340 Brevard County	50	6.79	1.18	0.00	18.83	10.00	46.92	20.00	33.06	70.00	0.23	0.00	0.00	0.24	0.30						
MSA 42680- Indian River County	121	16.44	1.08	0.83	11.88	8.26	58.73	64.46	28.31	26.45	1.57	0.00	3.23	1.76	0.93						
MSA 42700- Highlands County	4	0.54	0.00	0.00	7.17	0.00	80.12	50.00	12.71	50.00	0.00	0.00	0.00	0.00	0.00						

<sup>\*</sup> Based on 2014 Peer Mortgage Data -- US and PR

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

<sup>\*\*\*</sup> Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY															
Geography: FLORIDA															
Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2015															
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% of MF Units <sup>***</sup>	% BANK Loans <sup>****</sup>	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 38940 Martin-St Lucie Counties	5	27.78	1.24	40.00	19.26	20.00	41.19	20.00	38.31	20.00	6.67	50.00	0.00	0.00	0.00
NonMSA Desoto- Glades-Hendry- Okeechobee Counties	0	0.00	0.00	0.00	35.35	0.00	62.34	0.00	2.31	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
MD 22744- Broward County	1	5.56	4.53	0.00	36.14	0.00	41.64	100.00	17.69	0.00	0.00	0.00	0.00	0.00	0.00
MD 48424- Palm Beach County	4	22.22	6.39	0.00	31.55	25.00	33.58	50.00	28.47	25.00	1.23	0.00	2.94	0.00	0.00
MSA 19660- Flagler-Volusia Counties	0	0.00	7.36	0.00	25.34	0.00	38.66	0.00	28.65	0.00	0.00	0.00	0.00	0.00	0.00
MSA 36740-Lake-Orange-Osceola-Seminole	5	27.78	1.83	0.00	41.59	20.00	39.49	20.00	17.08	60.00	2.20	0.00	0.00	0.00	12.50
MSA 37340 Brevard County	1	5.56	5.84	0.00	24.02	0.00	44.56	0.00	25.58	100.00	0.00	0.00	0.00	0.00	0.00
MSA 42680- Indian River County	1	5.56	5.15	0.00	12.59	0.00	44.81	100.00	37.45	0.00	0.00	0.00	0.00	0.00	0.00
MSA 42700- Highlands County	1	5.56	0.00	0.00	12.39	0.00	82.89	100.00	4.72	0.00	20.00	0.00	0.00	25.00	0.00

<sup>\*</sup> Based on 2014 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

<sup>\*\*\*\*</sup> Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2015					Market Share (%) by Geography <sup>*</sup>				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans	% of Businesses <sup>***</sup>	% BANK Loans						
<b>Full Review:</b>																
MSA 38940 Martin-St Lucie Counties	594	29.86	1.76	0.84	18.59	28.45	52.93	43.27	26.61	27.44	1.79	0.00	2.54	1.65	1.64	
NonMSA Desoto-Glades- Hendry-Okeechobee Counties	101	5.08	0.00	0.00	28.66	27.72	62.52	67.33	8.82	4.95	2.45	0.00	3.79	1.95	2.38	
<b>Limited Review:</b>																
MD 22744- Broward County	60	3.02	3.44	1.67	24.56	23.33	33.75	38.33	38.25	36.67	0.03	0.00	0.03	0.04	0.04	
MD 48424- Palm Beach County	263	13.22	3.49	3.04	18.95	15.97	31.70	39.54	45.67	41.44	0.17	0.07	0.19	0.25	0.13	
MSA 19660- Flagler-Volusia Counties	53	2.66	2.86	11.32	18.56	13.21	50.98	41.51	27.61	33.96	0.16	0.00	0.21	0.15	0.17	
MSA 36740-Lake-Orange-Osceola-Seminole	579	29.11	0.64	1.73	23.55	25.91	38.77	34.72	37.03	37.65	0.36	2.03	0.39	0.30	0.37	
MSA 37340 Brevard County	142	7.14	1.68	2.11	22.48	50.00	41.85	25.35	33.95	22.54	0.38	2.42	0.79	0.27	0.16	
MSA 42680- Indian River County	187	9.40	4.35	14.44	8.73	3.74	56.43	58.82	30.28	22.99	1.80	2.61	2.21	2.08	0.94	
MSA 42700- Highlands County	10	0.50	0.00	0.00	8.17	0.00	74.45	70.00	17.04	30.00	0.00	0.00	0.00	0.00	0.00	

<sup>\*</sup> Based on 2014 Peer Small Business Data -- US and PR

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

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2014).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: FLORIDA															
Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2015															
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>1</sup>				
	#	% of Total <sup>2</sup>	% of Farms <sup>3</sup>	% BANK Loans	% of Farms <sup>3</sup>	% BANK Loans	% of Farms <sup>3</sup>	% BANK Loans	% of Farms <sup>3</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 38940 Martin-St Lucie Counties	4	12.50	1.47	25.00	21.00	25.00	52.29	25.00	25.24	25.00	1.92	0.00	0.00	0.00	5.00
NonMSA Desoto- Glades-Hendry- Okeechobee Counties	20	62.50	0.00	0.00	29.42	45.00	58.01	40.00	12.57	15.00	2.56	0.00	4.17	2.44	0.00
<b>Limited Review:</b>															
MD 22744- Broward County	0	0.00	3.70	0.00	28.50	0.00	33.05	0.00	34.74	0.00	0.00	0.00	0.00	0.00	0.00
MD 48424- Palm Beach County	6	18.75	3.85	16.67	22.07	0.00	29.96	83.33	44.07	0.00	3.25	0.00	0.00	12.90	0.00
MSA 19660- Flagler-Volusia Counties	1	3.13	1.19	0.00	16.07	100.00	56.29	0.00	26.45	0.00	0.00	0.00	0.00	0.00	0.00
MSA 36740-Lake-Orange-Osceola-Seminole	0	0.00	0.56	0.00	20.18	0.00	45.48	0.00	33.64	0.00	0.00	0.00	0.00	0.00	0.00
MSA 37340 Brevard County	1	3.13	1.46	0.00	23.41	100.00	44.77	0.00	30.35	0.00	0.00	0.00	0.00	0.00	0.00
MSA 42680- Indian River County	0	0.00	1.66	0.00	16.35	0.00	64.22	0.00	17.54	0.00	0.00	0.00	0.00	0.00	0.00
MSA 42700- Highlands County	0	0.00	0.00	0.00	5.82	0.00	74.43	0.00	18.89	0.00	0.00	0.00	0.00	0.00	0.00

<sup>1</sup> Based on 2014 Peer Small Business Data -- US and PR

<sup>2</sup> Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>3</sup> Source Data - Dun and Bradstreet (2014).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE															
Geography: FLORIDA															
Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2015															
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>*</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>1</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>***</sup>	% Families <sup>**</sup>	% BANK Loans <sup>***</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
MSA 38940 Martin-St Lucie Counties	1,730	48.75	18.62	4.37	20.11	12.65	20.32	17.67	40.95	65.31	6.37	5.45	3.91	4.76	8.22
NonMSA Desoto- Glades-Hendry- Okeechobee Counties	60	1.69	23.60	3.64	20.77	25.45	19.86	23.64	35.77	47.27	2.56	2.08	2.45	2.52	2.76
<b>Limited Review:</b>															
MD 22744- Broward County	21	0.59	22.03	0.00	17.44	19.05	19.79	19.05	40.73	61.90	0.04	0.00	0.00	0.09	0.04
MD 48424- Palm Beach County	301	8.48	21.50	2.67	17.84	11.00	18.93	17.67	41.73	68.67	0.49	0.00	0.21	0.53	0.59
MSA 19660- Flagler-Volusia Counties	31	0.87	19.73	0.00	18.20	3.33	21.95	26.67	40.12	70.00	0.11	0.00	0.00	0.15	0.14
MSA 36740-Lake-Orange-Osceola-Seminole	390	10.99	20.08	0.78	18.64	11.92	20.77	16.06	40.51	71.24	0.21	0.00	0.12	0.08	0.30
MSA 37340 Brevard County	536	15.10	19.36	3.18	18.76	10.65	21.46	19.63	40.42	66.54	1.66	0.96	1.05	1.40	2.16
MSA 42680- Indian River County	475	13.38	20.32	4.22	16.98	15.82	21.98	18.78	40.72	61.18	5.69	3.36	4.43	6.51	5.91
MSA 42700- Highlands County	5	0.14	15.63	0.00	21.26	20.00	24.03	40.00	39.09	40.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup> Based on 2014 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 0.8% of loans originated and purchased by bank.

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

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2015					Market Share <sup>*</sup>				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>2</sup>	% BANK Loans <sup>****</sup>	% Families <sup>**</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Full Review:</b>																
MSA 38940 Martin-St Lucie Counties	166	48.97	18.62	9.09	20.11	23.64	20.32	25.45	40.95	41.82	10.98	7.41	16.42	14.47	7.95	
NonMSA Desoto-Glades- Hendry-Okeechobee Counties	48	14.16	23.60	12.77	20.77	21.28	19.86	40.43	35.77	25.53	17.05	17.65	16.00	30.00	7.69	
<b>Limited Review:</b>																
MD 22744- Broward County	7	2.06	22.03	0.00	17.44	0.00	19.79	0.00	40.73	100.00	0.00	0.00	0.00	0.00	0.00	
MD 48424- Palm Beach County	25	7.37	21.50	0.00	17.84	0.00	18.93	13.64	41.73	86.36	0.85	0.00	0.00	0.59	1.33	
MSA 19660- Flagler-Volusia Counties	1	0.29	19.73	0.00	18.20	0.00	21.95	0.00	40.12	100.00	0.00	0.00	0.00	0.00	0.00	
MSA 36740-Lake-Orange-Osceola-Seminole	22	6.49	20.08	0.00	18.64	13.64	20.77	4.55	40.51	81.82	0.17	0.00	0.36	0.00	0.22	
MSA 37340 Brevard County	7	2.06	19.36	0.00	18.76	0.00	21.46	14.29	40.42	85.71	0.42	0.00	0.00	0.97	0.50	
MSA 42680- Indian River County	58	17.11	20.32	16.07	16.98	17.86	21.98	25.00	40.72	41.07	8.87	0.00	15.00	0.00	10.96	
MSA 42700- Highlands County	5	1.47	15.63	20.00	21.26	20.00	24.03	40.00	39.09	20.00	1.27	10.00	0.00	0.00	0.00	

<sup>\*</sup> Based on 2014 Peer Mortgage Data -- US and PR

<sup>\*\*</sup> Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

<sup>\*\*\*</sup> Percentage of Families is based on the 2010 Census information.

<sup>\*\*\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchased by bank.

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

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE															Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2015				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>1</sup>													
	#	% of Total <sup>2</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	% Families <sup>3</sup>	% BANK Loans <sup>4</sup>	Overall	Low	Mod	Mid	Upp							
<b>Full Review:</b>																								
MSA 38940 Martin-St Lucie Counties	373	50.68	18.62	4.34	20.11	14.36	20.32	21.14	40.95	60.16	1.62	1.34	0.98	1.72	1.83									
NonMSA Desoto- Glades-Hendry- Okeechobee Counties	34	4.62	23.60	6.06	20.77	15.15	19.86	24.24	35.77	54.55	2.70	4.35	3.13	3.61	1.65									
<b>Limited Review:</b>																								
MD 22744- Broward County	10	1.36	22.03	0.00	17.44	0.00	19.79	0.00	40.73	100.00	0.03	0.00	0.00	0.00	0.05									
MD 48424- Palm Beach County	56	7.61	21.50	1.79	17.84	7.14	18.93	7.14	41.73	83.93	0.15	0.19	0.00	0.12	0.19									
MSA 19660- Flagler-Volusia Counties	9	1.22	19.73	0.00	18.20	0.00	21.95	25.00	40.12	75.00	0.00	0.00	0.00	0.00	0.00									
MSA 36740-Lake-Orange-Osceola-Seminole	79	10.73	20.08	1.41	18.64	5.63	20.77	11.27	40.51	81.69	0.10	0.12	0.11	0.07	0.10									
MSA 37340 Brevard County	50	6.79	19.36	4.00	18.76	8.00	21.46	20.00	40.42	68.00	0.29	0.27	0.16	0.26	0.36									
MSA 42680- Indian River County	121	16.44	20.32	5.00	16.98	20.00	21.98	20.83	40.72	54.17	1.88	1.49	2.26	3.25	1.35									
MSA 42700- Highlands County	4	0.54	15.63	0.00	21.26	25.00	24.03	0.00	39.09	75.00	0.00	0.00	0.00	0.00	0.00									

<sup>1</sup> Based on 2014 Peer Mortgage Data -- US and PR

<sup>2</sup> Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

<sup>3</sup> Percentage of Families is based on the 2010 Census information.

<sup>4</sup> As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchased by bank.

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

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2015				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
MSA 38940 Martin-St Lucie Counties	594	29.82	74.69	47.31	76.43	10.61	12.96	1.79	1.08
NonMSA Desoto- Glades- Hendry- Okeechobee Counties	101	5.07	71.96	59.41	76.24	11.88	11.88	2.45	2.22
<b>Limited Review:</b>									
MD 22744- Broward County	60	3.01	72.30	46.67	31.67	16.67	51.67	0.03	0.03
MD 48424- Palm Beach County	264	13.25	72.20	42.42	56.44	18.56	25.00	0.17	0.11
MSA 19660- Flagler-Volusia Counties	53	2.66	72.93	50.94	58.49	22.64	18.87	0.16	0.18
MSA 36740-Lake-Orange-Osceola-Seminole	579	29.07	72.14	48.01	51.30	22.45	26.25	0.36	0.29
MSA 37340 Brevard County	142	7.13	73.05	45.77	59.86	15.49	24.65	0.38	0.25
MSA 42680- Indian River County	189	9.49	61.58	53.44	74.60	13.23	12.17	1.80	1.55
MSA 42700- Highlands County	10	0.50	64.14	70.00	70.00	10.00	20.00	0.00	0.00

\*Based on 2014 Peer Small Business Data -- US and PR

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

\*\*\*Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2014).

\*\*\*\*Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 14.06% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO SEPTEMBER 30, 2015				
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
MSA 38940 Martin-St Lucie Counties	4	12.50	96.10	25.00	100.00	0.00	0.00	1.92	0.00
NonMSA Desoto- Glades-Hendry- Okeechobee Counties	20	62.50	90.39	60.00	65.00	25.00	10.00	2.56	0.00
<b>Limited Review:</b>									
MD 22744- Broward County	0	0.00	97.46	0.00	0.00	0.00	0.00	0.00	0.00
MD 48424- Palm Beach County	6	18.75	96.43	16.67	100.00	0.00	0.00	3.25	0.00
MSA 19660- Flagler-Volusia Counties	1	3.13	97.87	100.00	100.00	0.00	0.00	0.00	0.00
MSA 36740-Lake-Orange-Osceola-Seminole	0	0.00	96.47	0.00	0.00	0.00	0.00	0.00	0.00
MSA 37340 Brevard County	1	3.13	98.32	0.00	100.00	0.00	0.00	0.00	0.00
MSA 42680- Indian River County	0	0.00	95.14	0.00	0.00	0.00	0.00	0.00	0.00
MSA 42700- Highlands County	0	0.00	93.61	0.00	0.00	0.00	0.00	0.00	0.00

<sup>\*</sup>Based on 2014 Peer Small Business Data -- US and PR

<sup>\*\*</sup>Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

<sup>\*\*\*</sup>Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2014).

<sup>\*\*\*\*</sup>Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 12.50% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: FLORIDA									
Evaluation Period: OCTOBER 19, 2012 TO NOVEMBER 30, 2015									
Assessment Area:	Prior Period Investments <sup>*</sup>		Current Period Investments		Total Investments			Unfunded Commitments <sup>**</sup>	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 38940 Martin-St Lucie Counties	0	0	0	06	44	3,156	24.00	1	469
NonMSA Desoto- Glades-Hendry- Okeechobee Counties	01	043	17	96	18	139	1.06	0	0
Statewide/Regional within Assessment Area	0	0	15	3,672	15	3,672	27.46	1	1,573
Regional Outside Assessment Area	1	184	1	162	2	346	3.10	1	1,338
<b>Limited Review:</b>									
MD 22744- Broward County	0	0	0	0	0	0	0.00	0	0
MD 48424- Palm Beach County	1	0	6	063	7	2,377	18.08	0	0
MSA 19660- Flagler-Volusia Counties	0	0	1	1	1	1	0.00	0	0
MSA 36740-Lake-Orange-Osceola-Seminole	1	122	7	2,719	8	2,841	0.00	0	0
MSA 37340 Brevard County	1	75	2	3	3	78	0.0059	0	0
MSA 42680- Indian River County	1	56	11	217	12	273	2.08	0	0
MSA 42700- Highlands County	1	263	1	1	2	264	2.01	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS    Geography: FLORIDA    Evaluation Period: OCTOBER 19, 2012 TO NOVEMBER 30, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
MSA 38940 Martin-St Lucie Counties	43.93	0	0.00	0.00	0.00	0.00	30.00	0	0	0	0	0	0	2.29	19.63	55.65	22.43
NonMSA Desoto- Glades-Hendry- Okeechobee Counties	9.75	0	0.00	0.00	0.00	83.33	0.00	0	0	0	0	0	0	0.00	34.53	56.55	8.92
<b>Limited Review:</b>																	
MD 22744- Broward County	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	4.13	28.90	35.76	31.21
MD 48424- Palm Beach County	9.87	0	0.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	4.88	26.01	33.30	35.59
MSA 19660- Flagler-Volusia Counties	2.46	0	0.00	0.00	50.00	50.00	0.00	0	0	0	0	0	0	2.64	17.89	56.99	22.47
MSA 36740-Lake-Orange-Osceola-Seminole	16.65	0	0.00	0.00	0.00	27.28	0.00	0	0	0	0	0	0	1.09	26.67	41.33	30.90
MSA 37340 Brevard County	7.32	0	0.00	0.00	0.00	0.00	33.33	0	0	0	0	0	0	2.39	20.42	47.51	29.68
MSA 42680- Indian River County	8.94	0	0.00	16.67	0.00	66.67	0.00	0	0	0	0	0	0	2.30	14.60	59.37	23.73
MSA 42700- Highlands County	1.08	0	0.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	9.36	76.87	13.75