



PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Florida Community Bank, National Association
Charter Number 24947

Weston Corporate Center 1, 2500 Weston Road
Weston, FL 33331

Office of the Comptroller of the Currency

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

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General Information and Overall CRA Rating

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution’s record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Florida Community Bank, National Association (NA) issued by the Office of the Comptroller of the Currency (OCC), the institution’s supervisory agency, for the evaluation period starting October 15, 2013 and ending March 6, 2017. The OCC rates the CRA performance of an institution consistent with the provisions set forth in *Appendix A* to 12 CFR 25.

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

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

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

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

The major factors that support this rating include:

- Overall lending activity that reflects good responsiveness to credit needs in the assessment area (AA) and to low- and moderate-income people, as well as small businesses when consideration is given to the excellent level of community development lending that had a positive impact on the Lending Test and performance context.
- A good level of qualified investments that reflect good responsiveness.
- Retail service delivery systems that are reasonably accessible to geographies and individuals of different income levels in the Bank’s AA.

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-

Low-or moderate-income geographies;

Designated disaster areas; or

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- Rates of poverty, unemployment, and population loss; or

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 refinancing's, 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

Florida Community Bank, NA (FCB) is an intrastate commercial bank headquartered in Weston, Florida. FCB was originally wholly owned by Bond Street Holdings, Inc. (BSH) also headquartered in Weston, Florida. BSH was established in April 2009, to acquire depository institutions within the United States, initially through failed bank auctions conducted by the FDIC. In August 2014, FCB made the transition from a private company to a publicly traded company and began trading on the New York Stock Exchange (NYSE) under the symbol of FCB. Bond Street Holdings, Inc. became FCB Financial Holdings, Inc. During the evaluation period, the Bank acquired Great Florida Bank (GFB). This Miami-Lakes based bank was a twenty-five banking center bank located in Miami-Dade, Broward, and Palm Beach Counties.

As of December 31, 2016, FCB reported total assets of \$8.9 billion. Deposits totaled \$7.3 billion. The total loan portfolio (net of unearned income) totaled \$6.6 billion and represented 74.16 percent of total assets. The loan to deposit ratio was 90.55 percent. Components of FCB's loan portfolio include commercial real estate loans (40.72 percent), residential real estate loans (39.00 percent), commercial and industrial loans (20.20 percent), and consumer loans (0.08 percent). As of December 31, 2016, tier 1 capital totaled \$795 million. The holding company, FCB Financial Holdings, Inc., had total consolidated assets of \$9 billion.

FCB offers a full range of traditional banking products and services to individuals, small- and medium-sized businesses, and other local entities, through 45 full service branches and one limited service facility located in Weston. The branch network extends from Naples to Sarasota, and beyond to Brooksville on the west coast of Florida, and from Miami to Daytona Beach on the east coast. Offices in the greater Orlando area provide coverage in central Florida. The Bank targets commercial customers engaged in a wide variety of industries including healthcare and professional services, retail and wholesale trade, tourism, agricultural services, manufacturing, distribution and distribution-related industries, technology, automotive, aviation, food products, building materials, residential housing and commercial real estate.

There are no legal or financial factors impeding FCB's ability to help meet the credit needs of its assessment areas. However, FCB, and the financial industry collectively, faced significant challenges during the evaluation period due to the long lasting impact of the Great Recession of 2008 that was spurred by the housing crisis, severe employment contraction, and a slow economic recovery. The Bank received a Satisfactory rating in its previous CRA evaluation dated October 15, 2013.

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 reporting under the Home Mortgage Disclosure Act (HMDA), small loans to businesses subject to reporting under the CRA, and community development loans. We also evaluated community development investments and community development services.

We did not complete an analysis of home improvement loans, multifamily loans, and small loans to farms given that the low volume of originations would not yield a meaningful analysis. Furthermore, the aforementioned products are offered but the Bank does not actively market them. However, we included the tables associated with home improvement loans, multifamily loans, and small loans to farms. Multifamily affordable housing loans are also included in the analysis of community development loans.

The evaluation period for the Lending Test is January 1, 2014 through December 31, 2016. For the Investment and Service Tests the evaluation period is October 15, 2013, the date of the last CRA evaluation, through December 31, 2016. In consideration of the 2015 census update effective in 2017, all test evaluation periods ended December 31, 2016.

Our conclusions related to community development loans and qualified investments are based on the number and dollar amounts made during the evaluation period. In addition, we considered the level of innovation, complexity, responsiveness to community credit needs, and the degree to which investment instruments are not routinely provided by private investors.

Data Integrity

In August 2016, we completed a data integrity examination that included sampling records from the Home Mortgage Disclosure Act (HMDA) Loan Application Register and sampling business loans from the CRA Data Collection for 2014, 2015, and 2016. We found no errors in the data. We also reviewed the community development loans, investments, and services submitted by the Bank to ensure the loans, investments, and services met the regulatory definition for community development. We excluded some items submitted for consideration, because they did not meet the definition or purpose of community development.

Selection of Areas for Full-Scope Review

The Bank currently has 14 assessment areas in Florida comprised of Counties that are part of Metropolitan Divisions (MD), Metropolitan Statistical Areas (MSA), or Non-MSAs. Areas selected for full-scope review have the most branch, deposit, and lending activities. Refer to Appendix A for additional information regarding the assessment areas receiving a full-scope review.

Full-Scope Reviews included the following assessment areas (AA):

MD 22744 - Broward County
MD 33124 - Miami-Dade County

MD 48424 - Palm Beach County
MSA 34940 - Collier County

Limited-Scope Reviews included the following:

MSA 15980 - Lee County
MSA 19660 (partial) - Volusia County
MSA 35840 (partial) - Sarasota County
MSA 36740 (partial) - Orange and Seminole Counties
MSA 37340 - Brevard County
MSA 38940 - Martin and St Lucie Counties
MSA 39460 - Charlotte County
MSA 42680 - Indian River County
MSA 45300 (partial) - Hernando and Hillsborough Counties
Non-MSA - Hendry County

Ratings

The Bank's overall rating is based primarily on those areas that received full-scope reviews. The full-scope areas represent approximately 59 percent of the deposits as of June 30, 2016, approximately 47 percent of the loans originated during the evaluation period, and 46 percent of the banking offices.

Small loans to businesses carried the most weight in our analysis considering the Bank's strategic focus is lending to businesses. For home mortgage loans, we gave the most weight to home purchase loans, which represent approximately 82 percent of mortgage lending activity.

In determining conclusions related to lending activity, market share, home mortgage, and small business data, we used peer mortgage and peer small business data for 2015 which was the most recent peer data available at the time of our evaluation.

Other

The OCC determined community credit needs in the AAs by reviewing recent community contacts in each full-scope AA conducted by the OCC in connection with other CRA examinations of banks operating in the same AAs. We also conducted two contacts with investment firms that provide CRA qualified investments to assess the investment opportunities available. The most commonly identified community development needs center around affordable housing rehabilitation and new construction of both single-family and multifamily occupancy. Other identified needs are credit and resource assistance to purchase affordable housing, credit and resource assistance to small businesses and entrepreneurs, and homeownership and foreclosure counseling.

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 in Florida is rated "High Satisfactory", when considering the Bank's excellent level of community development lending in the Broward County and Miami-Dade full-scope assessment areas. Based on full-scope reviews, the Bank's performance in MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) is good. Performance is good in MD Broward and MD Miami-Dade Counties. Performance is adequate in MD Palm Beach and MSA Collier Counties.

Lending Activity

Overall, the Bank's lending activity reflects adequate responsiveness to assessment area credit needs for mortgages and small business loans, but is overall considered good when considering the excellent level of community development lending and performance context. Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the Bank's lending activity. Home mortgage lending activity was adequate and small business activity was adequate.

Multiple performance context factors had an impact on FCB's lending activity. During the evaluation period, the Bank acquired Great Florida Bank that increased branches in Broward, Palm Beach, and Miami-Dade Counties in 2014. The Bank continues to increase organic growth during the evaluation period but also was challenged with strong competition in its assessment areas with a large number of lenders reporting home mortgage loan activity. These lenders include non-bank lenders that do not take deposits in the assessment area as well as large banks with a nationwide presence that offer a wide variety of home mortgage loan products and a large count of business loans with small average loan sizes.

Economic recovery from the recession has been sluggish during the evaluation period but improving, including declines in foreclosure rates, reduction of high unemployment rates, and improvement in homes with negative equity positions. More stringent underwriting practices also factored into loan production among banks as well as foreign investors purchasing residential properties with cash further reducing affordable housing for low- and moderate-income people. Obtaining subsidized residential lending for low- and moderate-income people could be difficult due to a sometime lengthy loan process not timely enough to obtain an available property. All these factors impacted overall lending activity during the evaluation period for lenders in the Bank's assessment areas. For further discussion on these and other performance context issues, please see the Market Profile in Appendix B.

During the evaluation period, the Bank had a very low volume of home improvement, multifamily, and small farm lending which are not primary products; therefore, an analysis of these activities would not be meaningful and was not completed for this review of performance. Refinance loan volumes were not robust but are gradually increasing as residential property values and the economy continue to recover from the economic recession in prior years. Low- and moderate-income people are not likely to refinance if they have a subsidized loan because subsidy programs typically do not allow refinancing.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Federal Deposit Insurance Corporation (FDIC) data as of June 30, 2016 shows that FCB had a deposit market share of 3.13 percent and was ranked 8th among 50 financial institutions reporting deposits in Broward County. Bank of America, National Association (NA) and Wells Fargo Bank, NA who rank 1st and 2nd, respectively, and have a combined deposit market share of 43.50 percent, dominated deposit market share.

Considering performance context, the Bank's home mortgage lending activity is adequate. For home purchase loans, FCB's market share and rank is significantly below its deposit market share and rank. This is poor but when considering performance context it is adequate. FCB's market share (by number of loans), based on aggregate data from 2015 is 0.19 percent, and the Bank is ranked 78th of 599 lenders reporting home purchase loans in Broward County. For refinance loans, both the Bank's loan market share and rank are significantly below its deposit market share and rank and is poor. When considering performance context the level of lending is adequate. FCB has a refinance loan market share of 0.10 percent and is ranked 115th of 474 lenders reporting refinance loans in Broward County. In Broward County, the home purchase market is dominated by Wells Fargo, NA and Paramount Residential Mortgage, who rank 1st and 2nd, respectively, with a combined market share of 16.32 percent. For refinance loans, the market is dominated by Wells Fargo, NA and Quicken Loans, who rank 1st and 2nd, respectively, and have a combined market share of 22.18 percent.

Lending activity for small loans to businesses is adequate considering performance context. The Bank's market share of small loans to businesses is significantly below its deposit market share and rank. Based on 2015 aggregate data the Bank's market share of small loans to businesses is 0.72 percent (based on dollar volume), and the Bank is ranked 22nd of 146 lenders reporting such loans in the county. 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 three reporters of small loans to businesses are all credit card lenders that combined have a market share of 57.73 percent based on number of loans but only 44.26 percent based on dollar volume. Therefore, a comparison based on dollar volume of loans is more meaningful given traditional commercial lenders make larger size loans. The top three reporters are American Express, FSB, Bank of America, NA, and Wells Fargo, NA.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

FDIC data as of June 30, 2016 shows that FCB had a deposit market share of 0.67 percent and was ranked 21st among 65 financial institutions reporting deposits in Miami-Dade County. Wells Fargo Bank, NA, Bank of America, NA and Citibank, NA, who rank 1st, 2nd, and 3rd, respectively, and have a combined deposit market share of 37.67 percent, dominated deposit market share.

For home purchase loans, FCB's market share and rank is significantly below its deposit market share and rank. This is poor but when considering performance context it is adequate. FCB's market share (by number of loans), based on aggregate data from 2015 is 0.15 percent, and the Bank is ranked 87th of 460 lenders reporting home purchase loans in Broward County. For refinance loans, both the Bank's loan market share and rank are significantly below its deposit market share and rank and is poor. When considering performance context the level of lending is adequate. FCB has a refinance loan market share of 0.16 percent and is ranked 89th of 435 lenders reporting refinance loans in Miami-Dade County.

In Miami-Dade County, the home purchase market is dominated by Wells Fargo, NA and Caliber Home Loans, who rank 1st and 2nd, respectively, with a combined market share of 16.84 percent. For refinance loans, the market is dominated by Wells Fargo, NA and Quicken Loans, who rank 1st and 2nd, respectively, and have a combined market share of 20.01 percent.

Lending activity for small loans to businesses is adequate considering performance context. The Bank's market share of small loans to businesses is significantly below its deposit market share and rank. Based on 2015 aggregate data the Bank's market share of small loans to businesses is 0.61 percent (based on dollar volume), and the Bank is ranked 28th of 136 lenders reporting such loans in the county. Market share and rank are based on the dollar volume of loans rather than number of loans as discussed earlier. The top three reporters of small loans to businesses are all credit card lenders that combined have a market share of 52.94 percent based on number of loans but only 37.34 percent based on dollar volume. The top three reporters are American Express, FSB, Bank of America, NA, and Wells Fargo, NA.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

FDIC data as of June 30, 2016 shows that FCB had a deposit market share of 1.65 percent and was ranked 12th among 57 financial institutions reporting deposits in Palm Beach County. Wells Fargo Bank, NA and Bank of America, NA who rank 1st and 2nd, respectively, and have a combined deposit market share of 37.51 percent, dominated deposit market share.

For home purchase loans, FCB's market share and rank is significantly below its deposit market share and rank. This is poor but when considering performance context it is adequate. FCB's market share (by number of loans), based on aggregate data from 2015 is 0.18 percent, and the Bank is ranked 86th of 597 lenders reporting home purchase loans in Palm Beach County. For refinance loans, both the Bank's loan market share and rank are significantly below its deposit market share and rank and is poor. When considering performance context the level of lending is adequate. FCB has a refinance loan market share of 0.08 percent and is ranked 136th of 493 lenders reporting refinance loans in Palm Beach County. In Palm Beach County, the home purchase market is dominated by Wells Fargo, NA and Quicken Loans, who rank 1st and 2nd, respectively, with a combined market share of 21.60 percent. For refinance loans, the market is dominated by Wells Fargo, NA and Quicken Loans, who rank 1st and 2nd, respectively, and have a combine market share of 20.01 percent.

Lending activity for small loans to businesses is adequate considering performance context. The Bank's market share of small loans to businesses is significantly below its deposit market share and rank. Based on 2015 aggregate data the Bank's market share of small loans to businesses is 0.13 percent (based on dollar volume), and the Bank is ranked 49th of 140 lenders reporting such loans in the county. Market share and rank are based on the dollar volume of loans rather than number of loans as discussed earlier. The top three reporters of small loans to businesses are all credit card lenders that combined have a market share of 58.10 percent based on number of loans but only 40.64 percent based on dollar volume. The top three reporters are American Express, FSB, Bank of America, NA, and Wells Fargo, NA.

MSA 34940 (Naples-Marco Island, FL)/Collier County

FDIC data as of June 30, 2016 shows that FCB had a deposit market share of 3.55 percent and was ranked 9th among 39 financial institutions reporting deposits in Collier County. Fifth Third Bank, Key Bank, NA, and Wells Fargo Bank, NA who rank 1st, 2nd, and 3rd respectively, and have a combined deposit market share of 39.73 percent, dominated deposit market share.

For home purchase loans, FCB's market share is near its deposit market share and exceeds its deposit market share rank. This performance is good. FCB's market share (by number of loans), based on aggregate data from 2015 is 03.12 percent, and the Bank is ranked 5th of 533 lenders reporting home purchase loans in Collier County. For refinance loans, both the Bank's loan market share and rank are significantly below its deposit market share and rank and is poor. When considering performance context the level of lending is adequate. FCB has a refinance loan market share of 1.06 percent and is ranked 20th of 376 lenders reporting refinance loans in Collier County. In Collier County, the home purchase market is dominated by Wells Fargo, NA and JP Morgan Chase, NA, who rank 1st and 2nd, respectively, with a combined market share of 13.90 percent. For refinance loans, the market is dominated by Wells Fargo, NA and Quicken Loans, who rank 1st and 2nd, respectively, and have a combined market share of 20.79 percent.

Lending activity for small loans to businesses is adequate considering performance context. The Bank's market share of small loans to businesses is significantly below its deposit market share and rank. Based on 2015 aggregate data the Bank's market share of small loans to businesses is 0.13 percent (based on dollar volume), and the Bank is ranked 49th of 140 lenders reporting such loans in the county. Market share and rank are based on the dollar volume of loans rather than number of loans as discussed earlier. The top three reporters of small loans to businesses are all credit card lenders that combined have a market share of 58.10 percent based on number of loans but only 40.64 percent based on dollar volume. The top three reporters are American Express, FSB, Bank of America, NA, and Wells Fargo, NA.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of loans is adequate, given performance context. The geographic distribution of loans is adequate based on a full-scope review of performance in the MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) and Collier County assessment areas. The geographic distribution of home mortgage loans is adequate and the geographic distribution of small loans to businesses is good, given performance context. The geographic distribution of home mortgage loans is adequate in Broward County, good in Miami-Dade County, adequate in Palm Beach County, and poor in Collier County. The geographic distribution of small loans to businesses is good in Broward, Miami-Dade, and Collier Counties and adequate in Palm Beach County.

While performance context factors had a negative impact on home mortgage lending overall during the evaluation period, it had the most negative impact on lender's ability to originate refinance loans as a large number of potential borrowers no longer qualified. In the Bank's overall MSA assessment area large numbers of homes were in a negative equity position as home prices declined drastically during the recession. High unemployment rates, which impacted low- and moderate-income people the most, contributed to the issue, along with the tightening of loan underwriting criteria by the secondary market and banks reduced the volume of refinance loans. For a further discussion of these and other performance context issues, please see the Market Profile in Appendix B.

Home Mortgage Loans

Refer to Tables 2, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

Overall, the geographic distribution of home mortgage loans is adequate, given performance context. The geographic distribution of both home purchase and home refinance loans is adequate, given performance context. The geographic distribution of home mortgage loans in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is adequate. The geographic distribution of home mortgage loans is good in Miami-Dade County, adequate in Broward and Palm Beach Counties, but poor in Collier County.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Overall, the geographic distribution of home mortgage loans in Broward County is adequate, given performance context. The distribution of home purchase loans is adequate and distribution of refinance loans is adequate, given performance context.

The percentage of home purchase loans in low-income geographies is below the percentage of owner-occupied housing units in those geographies. In moderate-income geographies the percentage of home purchase loans is near to the percentage of owner-occupied housing units in those geographies. In low-income geographies, the Bank had no market share of home purchase loans. In moderate-income geographies, the Bank's market share of home purchase loans was near its overall market share.

For refinance loans, the Bank had no loans in low-income geographies and in moderate-income geographies the percentage of refinance loans is significantly below the percentage of owner-occupied housing units. For low-income geographies the Bank had no market share for refinance loans and exceeded its overall market share in moderate-income geographies.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

Overall, the geographic distribution of home mortgage loans in Miami-Dade County is good, given performance context. The geographic distribution of home purchase loans is good and the distribution of refinance loans is adequate, given performance context.

In low-income geographies, the percentage of home purchase loans exceeds the percentage of owner-occupied housing units in those geographies, and the Bank had no market share of home purchase loans in low-income geographies according to 2015 Peer Mortgage data, but this data represents one year and we discounted it given the Bank did have some loans during the evaluation period in low-income geographies. In moderate-income geographies the percentage of the Bank's home purchase loans is near to the percentage of owner-occupied housing units in those geographies, and the Bank's market share of home purchase loans in moderate-income geographies exceeds its overall market share of home purchase loans.

The Bank made no refinance loans in low-income geographies; however, only 1.67 percent of owner-occupied housing, or 8,025 units, are located in low-income geographies. In moderate-income geographies the percentage of refinance loans is below the percentage of owner-occupied housing units. The Bank's market share of refinance loans in both low- and moderate-income geographies is significantly below its overall market share of refinance loans.

Even though the Bank had a low volume of multi-family loans (14), it is noteworthy to mention that the Bank had two of these loans in low-income geographies and six of the loans in a moderate-income geographies.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Given performance context, the overall geographic distribution of home mortgage loans in Palm Beach County is adequate. The geographic distribution of both home purchase and refinance loans is adequate.

In the low-income geographies of Palm Beach County the percentage of the Bank's home purchase loans is below the percentage of owner-occupied housing units and below the percentage of owner-occupied housing units in moderate-income geographies. The Bank's market share of home purchase loans in low-income geographies exceeds the Bank's overall market share of home purchase loans in Palm Beach County and also exceeds in moderate-income geographies.

For refinance loans, the Bank's lending was near the percentage of owner-occupied housing units in low-income geographies. The Bank had no refinance loans in moderate-income geographies. For low-income geographies the Bank's had no market share for refinance loans and we discounted this data as it represents only one year in the evaluation period and the Bank did have some loans in low-income geographies during the evaluation period. The Bank had no market share of refinance loans in moderate-income geographies.

Even though the Bank had a low volume of multi-family loans (4), it is noteworthy to mention that the Bank had one of these loans in a moderate-income geography.

MSA 34940 (Naples-Marco Island, FL)/Collier County

The geographic distribution of home mortgage loans in Collier County is poor. The geographic distribution for both home purchase and home refinance loans is poor.

For both low- and moderate-income geographies in Collier County, the Bank's percentage of home purchase loans is significantly below the percentage of owner-occupied housing units. The Bank's market share of home purchase loans in low- and moderate-income geographies is significantly below its overall market share of home purchase loans in Collier County.

For refinance loans, the Bank's lending was below the percentage of owner-occupied housing units in low-income geographies and significantly below the percentage of owner-occupied housing units in moderate-income geographies. For low-income, the Bank's market share in low-income geographies exceeded its overall market share and was below its overall market share in moderate-income geographies.

Small Loans to Businesses

Refer to Table 6 of 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 good. Geographic distribution of small loans to businesses in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is good. The geographic distribution of small loans to businesses is good in Broward, Miami-Dade, and Collier Counties. The volume of loans in Palm Beach County was too low for a meaningful analysis but deemed adequate given performance context.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

The geographic distribution of the Bank's small loans to businesses is good. The percentage of small loans to businesses in low-income geographies exceeds the percentage of businesses in the geography. The percentage of small loans to businesses in moderate-income geographies is near to the percentage of businesses in those geographies. The Bank's market share of small loans to businesses in low-income geographies exceeds the Bank's overall market share of small loans to business. The Bank's market share of small loans to businesses in the moderate-income geographies is near the Bank's overall market share of small loans to business.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

The geographic distribution of the Bank's small loans to businesses is good. The percentage of small loans to businesses for both low-income geographies and moderate-income geographies is near to the percentage of businesses. The Bank's market share of small loans to businesses in low-income geographies exceeds the Bank's overall market share of small loans to businesses. In moderate-income geographies, the Bank's market share in moderate-income geographies is below the Bank's overall market share.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

The volume of loans is too small to produce a meaningful analysis but deemed adequate considering performance context. The Bank had only 17 reportable business loans during the evaluation period; however, two of the loans were in low-income geographies and three were in moderate-income geographies.

MSA 34940 (Naples-Marco Island, FL)/Collier County

The geographic distribution of the Bank's small loans to businesses is good. The percentage of small loans to businesses in low-income geographies exceeds the percentage of businesses in the geography. The percentage of small loans to businesses in moderate-income geographies is near to the percentage of businesses in those geographies. The Bank's market share of small loans to businesses in low-income geographies exceeds the Bank's overall market share of small loans to business. The Bank's market share of small loans to businesses in the moderate-income geographies is near the Bank's overall market share of small loans to business.

Lending Gap Analysis

We evaluated the lending distribution of the Bank's assessment areas to determine if any unexplained conspicuous gaps existed. We found no unexplained conspicuous gaps after reviewing the geographic distribution of loans and the performance context.

Inside/Outside Ratio

This analysis is performed at the bank level rather than assessment area levels. A majority of home mortgage and small loans to businesses originated or purchased by FCB during the evaluation period are

within the Bank's assessment area. By number, 72.20 percent of loans and 66.53 percent of the dollar amount are inside the Bank's overall assessment area. We positively factored this performance into the overall analysis of the distribution of loans by income level of the geography.

By product, 78.28 percent of home purchase loans by number and 75.09 percent by dollar amount are inside the overall assessment area, and 42.37 percent of refinance loans by number and 39.63 percent by dollar amount are inside the overall assessment area. For small loans to businesses, 91.75 percent of loans by number and 89.75 percent by dollar amount are inside the Bank's assessment area.

Distribution of Loans by Income Level of the Borrower

Conclusions for Areas Receiving Full-Scope Reviews

Overall, the Bank's distribution of loans by income level of the borrower is adequate, given performance context. Both the distribution of home mortgage loans and the distribution of small loans to businesses are adequate. Overall borrower distribution is adequate in Broward, Miami-Dade, Palm Beach, and Collier Counties, given performance context.

Home Mortgage Loans

Refer to Tables 8 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.

Overall, the distribution of home mortgage loans by the income level of the borrower in the MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) and MSA 34940 (Naples-Marco Island, FL)/Collier County assessment area is adequate, given performance context. The distribution of home mortgage loans by income level of the borrower is adequate for Broward, Miami-Dade, Palm Beach, and Collier Counties, given performance context.

During the evaluation period, performance context issues made it difficult to provide home mortgage loans to low-income borrowers in the overall MSA assessment area. For this reason, more weight was given to lending to moderate-income borrowers in reaching our conclusions.

The lack of affordable housing inventory is a contributor to the Bank's limited origination of loans to low-income borrowers. The median housing value in MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is above \$200,000, while poverty levels for Palm Beach, Broward, and Miami-Dade Counties are 11 percent, 12 percent, and 18 percent, respectively. Collier County has a poverty rate of 9 percent. Subsidies are still needed, particularly by low-income borrowers. High property taxes and homeowner's insurance costs also contribute to the inability of low-income and many moderate-income borrowers to become homeowners. Many lower priced homes are quickly purchased for cash by investors, further limiting the number of affordable homes available to low- and moderate-income buyers. The lower rates offered on the Federal Housing Authority (FHA) product offered by larger lenders is also a competitive factor that challenges FCB's ability to originate to moderate-income buyers that meet FHA guidelines. In addition, it should be noted that 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. Furthermore, some special programs do not allow for refinancing.

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

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Overall, the distribution of home mortgage loans by the income level of the borrower in Broward County is adequate, given performance context. The distribution of home purchase loans and refinance loans is adequate, given performance context.

The percentage of home purchase loans to low-income borrowers is significantly below the percentage of low-income families in the county. The percentage of home purchase loans to moderate-income borrowers exceeds the percentage of moderate-income families in the county. The 2015 Peer Mortgage Data indicates that the Bank's market share to low-income people exceeded its overall market share. The Bank's market share to moderate-income people exceeded its overall market share.

For refinance loans, the Bank had no loans to low-income borrowers. Refinance loans made to moderate-income borrowers were significantly below the percentage of moderate-income families. This is poor but adequate when considering performance context. If low- or moderate-income people have subsidized loans, they may not be permitted to refinance. The Bank had no market share to low- or moderate-income borrowers. However, the market share is based only on one year and is not relevant to determining performance given that there were loans made to moderate-income borrowers during the evaluation period.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

Given performance context, the distribution of home mortgage loans by income level of the borrower in Miami-Dade County is adequate. The distribution of home purchase loans is adequate and the distribution of refinance loans is adequate, given performance context.

The percentage of home purchase loans to low-income borrowers is significantly below the percentage of low-income families in the county. The percentage of home purchase loans to moderate-income borrowers is near the percentage of moderate-income families in the county. The Bank's market share of home purchase loans to both low- and moderate-income borrowers exceeds the Bank's overall market share of home purchase loans.

Refinance loans made to both low- and moderate-income borrowers were significantly below the percentage of low- and moderate-income families. The 2015 Peer Mortgage Data indicates that the Bank's market share to low-income borrowers exceeded the Bank's overall market share. The Bank had no market share to moderate-income borrowers which is based only on one year and is not relevant to determining performance given some loans were made during the evaluation period.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Given performance context, the overall distribution of home mortgage loans by income level of the borrower in Palm Beach County is adequate.

Loans made to both low- and moderate-income borrowers were significantly below the percentage of low- and moderate-income families. The 2015 Peer Mortgage Data indicates that the Bank's market share to low-income borrowers is below the Bank's overall market share. The Bank's market share to moderate-income borrowers is significantly below the Bank's overall market share.

For refinance loans, the Bank had no loans to low-income borrowers and is poor but adequate when considering performance context. For moderate-income borrowers, the Bank is significantly below the percentage of moderate-income families and is poor but adequate when considering performance context. If low- or moderate-income people have subsidized loans, they may not be permitted to refinance. The Bank had no market share to low- or moderate-income borrowers.

MSA 34940 (Naples-Marco Island, FL)/Collier County

Given performance context, the overall distribution of home mortgage loans by income level of the borrower in Collier County is adequate.

Home purchase loans made to both low- and moderate-income borrowers were significantly below the percentage of low- and moderate-income families. The 2015 Peer Mortgage Data indicates that the Bank had no market share to low-income borrowers. The Bank's market share to moderate-income borrowers is significantly below the Bank's overall market share. However, the market share is based only on one year and is not relevant to determining performance given that there were loans made during the evaluation period.

For refinance loans, the Bank had no loans to low-income borrowers. Refinance loans made to moderate-income borrowers were significantly below the percentage of moderate-income families. This is poor but adequate when considering performance context. If low- or moderate-income people have subsidized loans, they may not be permitted to refinance. The Bank had no market share to low-income borrowers. The Bank's market share to moderate-income borrowers is below the Bank's overall market share.

Small Loans to Businesses

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

Overall, the borrower distribution of small loans to businesses is adequate. The borrower distribution of small loans to businesses in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is adequate. The distribution is adequate in Broward, Miami-Dade, and in Collier Counties and good in Palm Beach County.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

The distribution of small loans to businesses in Broward County is adequate. The Bank's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) is significantly below the percentage of small businesses located in Broward County. The Bank's market share of small loans to small businesses is near its overall market share of small loans to small businesses

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

The distribution of small loans to businesses in Miami-Dade County is adequate. The Bank's percentage of small loans to small businesses is below the percentage of small businesses located in Miami-Dade County. The Bank's market share of small loans to small businesses is near its overall market share of small loans to small businesses.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

The volume of small loans to businesses is too small to perform a meaningful analysis. Despite the volume of 17 loans, 12 of the loans were to small businesses. This performance is deemed good and near the percentage of small businesses in Palm Beach County.

MSA 34940 (Naples-Marco Island, FL)/Collier County

The distribution of small loans to businesses in Collier County is adequate. The Bank's percentage of small loans to small businesses is significantly below the percentage of small businesses located in Collier County. The Bank's market share of small loans to small businesses is near its overall market share of small loans to small 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. This table includes all CD loans, including multi-family loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

Overall, the Bank's community development lending activity in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) assessment area is excellent and it had a significant positive impact on the overall Lending Test rating. Performance is excellent in Broward and Miami-Dade Counties and had a positive impact. Performance is adequate in Palm Beach and Collier Counties and had a neutral impact on the Lending Test conclusions for those counties.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

FCB has an excellent level of community development loans in Broward County considering the level of its presence in the county. This performance had a positive impact on the overall Lending Test conclusion for Broward County.

During the community development evaluation period, the Bank made five (5) community development loans in Broward County totaling \$8.2 million. FCB originated three affordable housing loans (\$731,000), one economic development loan (\$5.5 million) supporting job creation and revitalization of a low- and moderate-income area, and one for services to low- and moderate-income people (\$2 million). A noteworthy example is:

- \$5.5 million loan that will provide construction and permanent financing for a new medical center building to be leased to West Boca Medical Center, an indirect subsidiary of Tenet

Healthcare Corporation. Land where construction and improvements will take place is located in a moderate census tract and LMI individual will benefit from the services. The project will serve as a catalyst for new job creation in the area.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

FCB has an excellent level of community development loans in Miami-Dade County. This performance had a positive impact on the overall Lending Test conclusion for Miami-Dade County.

During the evaluation period, the Bank made 24 community development loans, totaling \$195.4 million. Of the total, 12 loans (\$60.1 million) supported affordable housing and 12 loans (\$135.3 million) supported economic development. Noteworthy examples include:

- \$1.8 million to finance the purchase of four apartment buildings located in Miami Beach, Florida with 25 affordable housing units. Although the buildings are located in an upper-income geography it is surrounded by low- and moderate-income tracts.
- \$1.3 million loan providing bridge funding to rehabilitate an apartment project with 140 units for low-income senior citizen housing in a moderate-income tract of Miami Beach, Florida.
- \$350,000 loan to a non-profit organization dedicated to serving the critical needs of low- and moderate-income residents of the Haitian American community. The organization is in a low-income census tract.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

FCB has an adequate level of community development loans in Palm Beach County considering the level of its presence in the county. This performance had a neutral impact on the overall Lending Test conclusion for Palm Beach County.

The Bank originated three community development loans totaling \$4.4 million in Palm Beach County during the evaluation period. The three loans supported affordable housing. The following are noteworthy examples:

- \$3.4 million loan in a moderate-income geography providing 120 units with affordable rents in Boca Raton, FL.
- \$850,000 line of credit to purchase and rehabilitate property in low- and moderate-income areas for affordable housing in Delray Beach, Florida.

MSA 34940 (Naples-Marco Island, FL)/Collier County

FCB has an adequate level of community development loans in Palm Beach County considering the level of its presence in the county. This performance had a neutral impact on the overall Lending Test conclusion for Palm Beach County.

The Bank originated three community development loans totaling \$3.3 million in Collier County. Two of the loans (\$3 million) supported economic development and one (\$250,000) supported community development services to low- and moderate-income people. The following is a noteworthy example.

- \$2 million loan to a federally chartered corporation that promotes economic development in Immokalee, Florida. The project promotes permanent job creation and revitalizes a low-income geography.

Product Innovation and Flexibility

The Bank uses innovative and flexible lending practices in order to serve assessment area credit needs. FCB's use of these flexible programs had a positive impact on conclusions under the Lending Test.

FCB has engaged lending partnerships with 71 community homeownership affordable housing organizations that provide down-payment, closing cost, homebuyer education, credit counseling and other forms of education and monetary/grant assistance. Funding programs throughout the markets include State Housing Initiative Programs (SHIP), Community Development Block Grant (CDBG) programs, Neighborhood Housing Assistance Programs (NSP), Housing Authority Self Sufficiency Programs and Section 8 Housing, and many others. Based on the complexity of coordination and extensive time required to process and coordinate several closings on each loan for subsidies, there are only a few lenders in the market participating.

In addition to the lending product, FCB was an initial lender to approve and originate first time homebuyer loans through Community Land Trust (CLT) programs located in various markets in Southeast Florida. Other innovative affordable housing lending programs include the nationally recognized best practice H2H Homeless to Homeownership Program (Fort Lauderdale-Pompano Beach, Miami-Miami Beach-Kendall and West Palm Beach-Boca Raton-Boynton Beach assessment areas) by participating in financial workshops, monetary investments and loan originations noting over 275 active members, and the Veteran's Housing Program offered by the Affordable Homeownership Foundation, Inc. located in the Cape Coral-Fort Myers assessment areas.

As a sponsor member of the Federal Home Loan Bank of Atlanta, FCB is an approved lender of the Affordable Homeownership Program (AHP) providing grants for down-payment/closing costs for first-time homebuyers, foreclosure recovery, veterans, and community stabilization.

FCB has dedicated three (3) fulltime CRA Affordable Housing Specialists in addition to the CRA Analyst and CRA Officer to ensure appropriate geographic coverage and lending distribution throughout FCB's assessment areas.

The following are examples to highlight a few of the innovative/flexible products and programs the Bank used during the evaluation period.

Affordable Home Program- The Bank has an Affordable Home Program for first time home buyers that is a 30-year fixed rate and fixed term with no private mortgage insurance. Other features of the product include 95 percent/10 percent combined loan-to-value with a 3 percent buyer investment. Income up to 120 percent of the area median income adjusted for family size. Ratios of 35 percent/45 percent with

compensating factors. The Bank created this product to meet the needs of the community and low- and moderate-income borrowers. The Bank works with over 70 approved Community Partners. There are subsidy programs including SHIP, HOME, CDBG and other programs. During the evaluation period, the Bank made 195 loans aggregating \$21.5 million of which 158 loans receive subsidies of \$6.6 million.

Freddie Mac Home Possible & Home Possible Advantage Mortgages- In late 2016, FCB began offering Freddie Mac's Home Possible and Home Possible Advantage as a 97 percent loan-to-value (and maximum total loan-to value of 105 percent) as a new CRA lending product for low- and moderate-income borrowers. Benefits of these products includes financing for borrowers looking for low down payments and flexible sources of funds for both new purchases and refinances (with no cash out) by offering fixed-rate mortgages. Other benefits of the products included stable monthly payments with fixed-rate mortgages, reduced mortgage insurance coverage levels for loan-to-value ratios greater than 90 percent, noting minimum down payments of 3 percent. No loans were originated during the evaluation period since the program is new.

FHLB Atlanta Set-Aside Program Grants- The Bank participates in a payment/closing cost program which many other banks do not offer. The Bank's CRA Department monitors loans for 5 years and provides simultaneous closing coordination. The Bank had 14 loans totaling \$79,710 for first time home buyers and with community partners.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the Bank's performance under the lending test in MSA 36740- Seminole/Orange Counties, MSA 38940- St. Lucie/Martin Counties, MSA 39460- Charlotte County, MSA 19660-Volusia County, MSA 35840- Sarasota County, and MSA 37340- Brevard County is not inconsistent with the Bank's overall performance.

The Bank's performance in non-MSA Hendry County, MSA 42680- Indian River, and MSA 45300- Hernando/Hillsborough Counties is weaker than the Bank's overall performance but adequate. Hendry County had low volumes of mortgage (13 home mortgages) and business lending (11 business loans). Indian River and Hernando/Hillsborough Counties had low volumes of business lending with two and four loans, respectively. This performance had a neutral effect on the overall conclusion.

The Bank's Performance in MSA 15980- Lee County is stronger than the Bank's overall performance considering good home mortgage and business lending to low- and moderate-income geographies and very positive community development lending. This performance had a positive impact on the overall conclusion.

Refer to Tables 1 through 13 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". Based on full-scope reviews, the Bank's performance is good in the MD 22744- Broward County, MD 33124- Miami-Dade County, and in MD 48424- Palm Beach County. Performance is adequate in MSA 34940- Collier County.

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

FCB had a good level of qualified investments and grants/donations. FCB invested \$26.4 million in government-sponsored mortgage-backed securities (MBS), donations, and other CRA related funds located in the Bank's full-scope assessment areas. This volume of investments reflects positively on the Bank's effort to service its community needs. A few of the Bank's investments are innovative or complex and not routinely provided by private investors. Such investments positively affect the Bank's performance under the Investment Test. Examples include:

Goodwill of Southwest Florida, Inc.- MicroEnterprises Loan Funds

This program developed in the prior period. FCB is the only participating lender to provide lending and servicing for this agency. The program provides business owners and entrepreneurs with funding, relevant advice and assistance including new partnerships with start-up loans averaging \$2,000 to \$5,000 once participants graduate from a 6-week small business program. The Bank has 11 loans in the program totaling \$56,250 since inception, and seven of the loans were originated during the current evaluation period totaling \$36,250.

Women's Foundation of Southwest (SW) Florida (five SW Counties in Florida)

Individual Development Account (IDA) Matched Savings Program- FCB partnership with Women's Foundation of SW FL, United Way of Collier County, Hodges University and others. During this evaluation period, FCB invested \$30,000 and provided Master Accounts for the agency and created profiles for up to 43 future savers to save \$500 which will be matched by federal funds of \$4,000 for LMI women to continue their education with a local college or alternative school. FCB associates provided required financial literacy programs and banking services to over 100 attendees seeking matched federal funds.

Urban League of Broward County, Inc. – Small Business Loan

In October 2015, FCB invested \$250,000 as an equity partner to the Urban League of Broward County, Inc. as a founding investor for the Department of Economic Development's Small Business Loan Fund. The agency entered into a five-year grant agreement with the State of Florida Department of Economic Opportunity (DEO). The DEO provided \$1.25 million to establish, administer and market a loan guarantee program to stimulate access to credit for entrepreneurs, under-resourced and minority small business owners. As part of their agreement, the agency seek investors to invest in the Fund by raising a four-to-one match in seed capital from investors. FCB's investment in the amount of \$250,000 is an agreement with a term of ten (10) years at a 2.0% interest rate. With this investment, FCB was the second investor to recognize the innovativeness, and impactfulness of this program, and therefore was very responsive investment.

FCB Impact Center in Immokalee (In-Kind Office/Leased Rental Space)

In addition to monetary grants and donations, FCB also provided various forms of in-kind donations consisting of rent-free office space as part of FCB's Immokalee Impact Center located within the Banking Center 2nd floor office space and adjoining building in Collier County. Tenants of space enjoyed free rental space along with some utility expenses as a non-profit serving LMI residents throughout Immokalee and Collier County, FL. These agencies include Immokalee Business Development Center (IMBIZ), One by One Leadership Foundation, Inc. and Legal Aid Services of Collier County, Inc. Total annual value of this in-kind category averages \$82,000 per year.

The Community Development Fund

FCB as a charter member, invested \$1,000,000 in this fund that provided FNMA loans to the Miami-Dade County and Broward AAs. The fund seeks to positively impact community development in affordable and working housing alternatives to low- and moderate-income homebuyers, especially first-time homebuyers. In addition, the fund aims to encourage the development or rehabilitation of affordable single- and multi-family properties.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

The Bank's performance in the MD 22744 Broward County is good. FCB had \$7.8 million in MBS, grants, and donations. Grants and donations were invested in organizations that promoted affordable housing, services targeted to low- and moderate-income individuals, economic development, and revitalization and/or stabilization of low- and moderate-income census tracts. The Bank has \$5.6 million in prior period investments that are mortgage backed securities supporting affordable housing. Current period investments were \$2.2 million. Current period investments received more weight when determining the level of performance in each full-scope assessment area.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

The Bank's performance in the MD 33124 Miami-Miami Beach-Kendall is good. FCB had approximately \$7.6 million in MBS, grants, and donations. Grants and donations were invested in organizations that promoted affordable housing, services targeted to low- and moderate-income individuals, economic development, and revitalization/stabilization of low- and moderate-income census tracts. The Bank has \$4.4 million in prior period investments that are mortgage backed securities supporting affordable housing and current period investments of approximately \$3.2 million.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

The Bank's performance in the MD 48424 West Palm Beach-Boca Raton-Boynton Beach is good. FCB had approximately \$4.8 million in MBS, grants, and donations. Grants and donations were invested in organizations that promoted affordable housing, services targeted to low- and moderate-income individuals, economic development, and revitalization/stabilization of low- and moderate-income census tracts. The Bank has approximately \$1.3 million in prior period investments.

MSA 34940 (Naples-Marco Island, FL)/Collier County

The Bank's performance in the MSA 34940 Collier County is adequate. FCB had \$6.2 million in MBS, grants, and donations. Grants and donations were invested in organizations that promoted affordable housing, services targeted to low- and moderate-income individuals, economic development, and

revitalization/stabilization of low- and moderate-income census tracts. The Bank has \$764,000 in prior period investments.

Investments that impact multiple full-scope assessment areas:

Investments - Florida Statewide

In addition to the CD investments that directly benefit the Bank's AA, FCB provided \$49,000 in grants and donations to organizations that supported affordable housing initiatives and economic development in the broader statewide area of Florida that includes the Bank's AAs. These organizations have a purpose, mandate, or function to serve one or more of the Bank's AAs.

Investments - Florida Regional

In addition to the CD investments that directly benefit the Bank's AA, FCB provided \$61,000 in grants, and donations to organizations that supported affordable housing initiatives and economic development in the broader statewide area of Florida that includes the Bank's AAs. These organizations have a purpose, mandate, or function to serve one or more of the Bank's AAs.

Conclusions for Areas Receiving limited-Scope Reviews

Based on limited-scope reviews, the Bank's performance under the Investment Test in the MSA 36740- Seminole/Orange Counties and MSA 35840- Sarasota County is stronger than the Bank's overall "High Satisfactory" performance under the Investment Test and had a positive impact to the overall rating. The Bank's performance in the non-MSA Hendry County is not inconsistent with the Bank's overall rating

The Bank's performance in MSA 15980- Lee County, MSA 37340- Brevard County, MSA 38940- St. Lucie/Martin Counties, MSA 39460- Charlotte County, MSA 19660- Volusia County, and MSA 45300- Hernando/Hillsborough Counties is weaker but adequate with a neutral impact on the overall conclusion. Performance in MSA 42680- Indian River County is weaker than the Bank's overall "High Satisfactory" performance under the Investment Test and had a negative impact on the overall conclusion due to a poor level of investment.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

FCB's performance under the service test is rated "High Satisfactory." Based on a full-scope review, the Bank's performance in MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) is good. The Bank's performance in the MD 22744-Broward, MD 33124-Miami-Dade, MD 48424-Palm Beach, and MSA 34940-Collier Counties is good.

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.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

Delivery systems are reasonably accessible to all portions of the institution's assessment area(s). The Bank's performance in the MD 22744- Broward County is adequate. FCB offices are accessible to geographies and individuals of different income levels in the AA. The Bank operates six (6) branch offices in the area including its corporate headquarters housing a limited service branch and a full service office. The Bank has no offices in low-income geographies. The Bank has one office in a moderate-income tract. The percentage of this one branch in the moderate-income geography is near the percentage of population residing in moderate-income geographies. This branch and three other branches are adjacent to a moderate-income geography and one other office is adjacent to two moderate-income geographies. Alternative delivery channels offered by FCB in this AA include drive-thru teller lanes and an Automated Teller Machine (ATM) that accepts deposits at most locations. FCB offers telephone banking, Internet banking (including Bill Pay), and mobile banking that allows access to account information and funds transfer using both Apple and Google's smartphone/tablet operating systems. FCB also allows its customers to access the ATM network owned by the Florida based Publix grocery store chain (*Presto!*). This arrangement gives its customers access to a network of 1,055 ATMs located at Publix stores throughout Florida, Georgia, Alabama, South Carolina, and Tennessee at no charge.

The closing of branches has not adversely affected the accessibility of the Bank's delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. FCB closed six (6) offices in this AA during the evaluation period. These closings were as a result of acquiring Great Florida Bank (GFB) in 2014. One branch closure was in a low-income geography, four were in moderate-income geographies, and one was in an upper-income geography. Closed GFB branches were due to close proximately of existing FCB locations. As part of the acquisition of GFB, customers received increased services as part of being new customers to FCB to include Saturday hours, ATM locations, drive-thru facilities in some locations, and many new alternative delivery service products such as mobile banking, online banking, bank-by-mail, bill paying services, and internet banking for personal and business accounts. FCB also offers customers access 24 hours a day enabling customers to carry out transactions such as stop payments, funds transfers, wire transfers, obtain statements, etc., therefore no negative effect to the closings.

Branch office hours and the level of services available do not vary in a way that inconveniences certain portions of this AA, particularly low- and moderate-income geographies and/or individuals. Office

hours and services provided by AA facilities do not vary significantly from other AAs. The full service branch operates from 8:00 AM or 8:30 AM to 4:00 PM or 4:30 PM Monday through Thursday, and 8:30 AM or 9:00 AM to 6:00 PM on Fridays. The full service branch also has drive-thru facilities, with operating hours of 8:00 AM to 5:00 PM Monday through Thursday and 8:00 AM to 6:00 PM on Fridays. Operating hours are similar to those of major competitors in the AA. However, the limited service headquarters location is open from 8:30 AM to 5:00 PM Monday through Friday.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

Delivery systems are accessible to essentially all portions of the institution's assessment area(s). The Bank's performance in the MD 33124- Miami-Dade County is good. The Bank operates eight (8) branches in the AA. While no FCB office in this assessment is located in a low-income census tract, FCB operates two branches in a moderate-income tract. The percentage of FCB branches operated in moderate-income tracts is near the percentage of population in the moderate-income geographies in the AA. In addition, these branches are adjacent to additional moderate-income census tracts. Two of the branches are also adjacent to low-income geographies. Alternative delivery channels offered by FCB in this AA include the aforementioned drive-thru teller lanes and three ATMs that accept deposits. Further, FCB offers telephone banking, Internet banking (including Bill Pay), and mobile banking that allows access to account information and funds transfer using both Apple and Google's smartphone/tablet operating systems. FCB also allows its customers to access the ATM network owned by the Florida based Publix grocery store chain (*Presto!*). This arrangement gives its customers access to a network of 1,055 ATMs located at Publix stores throughout Florida, Georgia, Alabama, South Carolina, and Tennessee at no charge.

Branch closures have not adversely affected the accessibility of its delivery systems in the AA, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. FCB closed eleven (11) offices in this AA during the evaluation period and two of these were relocations. These closings were as a result of acquiring Great Florida Bank in 2014. One branch closed in a low-income tract. One branch closed in a moderate-income tract, but the Bank also opened a branch in a moderate-income tract. Closed GFB branches were due to close proximately of existing FCB locations. As part of the acquisition of Great Florida Bank, customers received increased services as part of being new customers to FCB to include Saturday hours, ATM locations, drive-thru facilities in some locations, and many new alternative delivery service products such as mobile banking, online banking, bank-by-mail, bill paying services, and internet banking for personal and business accounts. FCB also offers customers access 24 hours a day enabling customers to carry out transactions such as stop payments, funds transfers, wire transfers, obtain statements, etc., therefore no negative effect to the closings.

Branch office hours and the level of services available do not vary in a way that inconveniences certain portions of this AA, particularly low- and moderate-income geographies and/or individuals. Office hours and services provided by AA facilities do not vary significantly from other AAs. The full service branch operates from 8:00 AM or 8:30 AM to 4:00 PM or 4:30 PM Monday through Thursday, and 8:30 AM or 9:00 AM to 6:00 PM on Fridays. Two branches (North Miami Beach & Bird Rd.) have drive-thru facilities, with operating hours of 8:00 AM to 5:00 PM Monday through Thursday and 8:00 AM to 6:00 PM on Fridays. Operating hours are similar to those of major competitors in the AA.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

Delivery systems are reasonable accessible to essentially all portions of the institution's assessment area(s). The Bank's performance in the MD 48424- Palm Beach County AA is adequate. FCB's offices are reasonably accessible to geographies and individuals of different income levels in the AA. The Bank operates four branches in the West Palm Beach AA. These offices included no location situated in a low- or moderate-income census tract. However, two of the Bank's offices are adjacent to a moderate-income geography and one of these offices is also adjacent to a low-income geography. Alternative delivery channels offered by FCB in this AA include drive-thru teller lanes and a single Automated Teller Machine (ATM) that accepts deposits. FCB offers telephone banking, Internet banking (including Bill Pay), and mobile banking that allows access to account information and funds transfer using both Apple and Google's smartphone/tablet operating systems. FCB also allows its customers to access the ATM network owned by the Florida based Publix grocery store chain (*Presto!*). This arrangement gives its customers access to a network of 1,055 ATMs located at Publix stores throughout Florida, Georgia, Alabama, South Carolina, and Tennessee at no charge.

Branch closures have not adversely affected the accessibility of its delivery systems in the AA, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. One branch in a middle-income geography was closed during the evaluation period.

Branch office hours and the level of services available do not vary in ways that inconvenience certain portions of this AA, particularly low- and moderate-income geographies and/or individuals. Office hours and services provided by AA facilities do not vary significantly from other AAs. The full service branch operates from 8:00 AM or 8:30 AM to 4:00 PM or 4:30 PM Monday through Thursday, and 8:30 AM or 9:00 AM to 6:00 PM on Fridays. All branches (except for Boynton Beach) have drive-thru facilities, with operating hours of 8:00 AM to 5:00 PM Monday through Thursday and 8:00 AM to 6:00 PM on Fridays. Operating hours are similar to those of major competitors in the AA.

MSA 34940 (Naples-Marco Island, FL)/Collier County

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area(s). The Bank's performance in the MSA 34940- Collier County AA is adequate. The Bank operates three branches in the AA. While no FCB office in this assessment is located in a low-income geography, FCB operates one branch in a moderate-income tract. The percentage of FCB branches operated in moderate-income tracts exceeds the percentage of the population in moderate-income geographies. Alternative delivery channels offered by FCB in this AA include drive-thru teller lanes and ATMs. Further, FCB offers telephone banking, Internet banking (including Bill Pay), and mobile banking that allows access to account information and funds transfer using both Apple and Google's smartphone/tablet operating systems. FCB also allows its customers to access the ATM network owned by the Florida based Publix grocery store chain (*Presto!*). This arrangement gives its customers access to a network of 1,055 ATMs located at Publix stores throughout Florida, Georgia, Alabama, South Carolina, and Tennessee at no charge.

Branch closures have not adversely affected the accessibility of its delivery systems in the AA, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. FCB closed one office in a moderate-income geography during the evaluation period. There were no branch openings during the evaluation period. An existing branch in Immokalee, the Golden Gate

branch, was close in proximity to another branch and shared the same customer base, which was 86 percent certificate of deposit customers and, therefore, closed with minimum disruption to customers.

Branch office hours and the level of services available do not vary in ways that inconveniences certain portions of this AA, particularly low- and moderate-income geographies and/or individuals. Office hours and services provided by AA facilities do not vary significantly from other AAs. The full service branch operates from 9:00 AM to 4:00 PM Monday through Thursday, and 9:00 AM to 6:00 PM on Fridays. All branches have drive-thru facilities, with operating hours of 8:00 AM to 5:00 PM Monday through Thursday and 8:00 AM to 6:00 PM on Fridays. Operating hours are similar to those of major competitors in the AA.

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 is a leader in providing 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.

MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL)/Broward County

FCB has an excellent record of participating in community development initiatives within the Broward County AA. Community development initiatives have included programs for affordable housing, social services targeted to low- and moderate-income individuals, financial literacy, and economic development within the AA. Over the evaluation period, 12 FCB employees in this AA have been involved with 110 qualified organizations performing activities related to the aforementioned initiatives. FCB employees have occupied or currently hold Board or member positions in nine (9) of these organizations. Examples of qualified activities include the following:

- Broward County Housing Authority - Affordable housing,
- South Florida Community Land Trust - Affordable housing solutions, and
- Urban League of Broward County, Inc. - Economic self-sufficiency/development of low- and moderate-income residents.

MD 33124 (Miami-Miami Beach-Kendall, FL)/Miami-Dade County

FCB has an excellent record of participating in community development initiatives within the Miami-Dade County AA. Community development initiatives have included programs for affordable housing, social services targeted to low- and moderate-income individuals, financial literacy, and economic development within the AA. Over the evaluation period, 13 FCB employees in this AA have been involved with 67 qualified organizations performing activities related to the aforementioned initiatives. Examples of qualified activities include the following:

- Miami Dade Affordable Housing Foundation- Affordable housing,
- Miami Bridge - Youth program for low- and moderate-income residents, and

- Switchboard of Miami - Counseling and referral services for low- and moderate-income residents.

MD 48424 (West Palm Beach-Boca Raton, FL)/Palm Beach County

FCB has an excellent record of participating in community development initiatives within the West Palm Beach AA. Community development initiatives have included programs for affordable housing, social services targeted to low- and moderate-income individuals, financial literacy, and economic development within the AA. Over the evaluation period, 18 FCB employees in this AA have been involved with 44 qualified organizations performing activities related to the aforementioned missions. FCB employees have occupied or currently hold Board or member positions in 11 of these organizations. Examples of qualified activities include the following:

- Housing Leadership Council - Affordable housing,
- Milagro Center - Financial literacy to low- and moderate-income residents, and
- Urban League of Palm Beach County - Social and poverty relief services.

MSA 34940 (Naples-Marco Island, FL)/Collier County

FCB has an excellent record of participating in community development initiatives within the Naples AA. Community development initiatives have included programs for affordable housing, social services targeted to low- and moderate-income individuals, financial literacy, and economic development within the AA. Over the evaluation period, 33 different FCB employees in this AA have been involved with 59 qualified organizations performing community development service activities. FCB employees have occupied or currently hold Board or member positions in 11 of the organizations. Examples of qualified activities include the following:

- Immokalee Foundation - Child services to low- and moderate-income residents,
- Women's Foundation of Southwest Florida, Inc. - Assistance program to low- and moderate-income women, and
- Housing Education Lending Programs of Florida - Homebuyer education program to low- and moderate-income residents.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the Bank's performance under the service test in the non-MSA Hendry County, MSA 36740- Seminole/Orange Counties, MSA 38940- St. Lucie/Martin Counties, MSA 19660- Volusia County, MSA 35840- Sarasota County, MSA 45300- Hernando/Hillsborough Counties, and MSA 15980- Lee County is not inconsistent with the Bank's overall conclusion. Performance in the MSA 37340- Brevard County, MSA 39460- Charlotte County, and MSA 42680- Indian River County is weaker but adequate considering fewer activities and a lower level of employee participation. The weaker performance had a neutral impact on the overall 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”).

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/2014 to 12/31/2016 Investment and Service Tests and CD Loans: 10/15/2013 to 12/31/2016	
Financial Institution	Products Reviewed	
Florida Community Bank, N.A. (FCB) Weston Corporate Center 1, 2500 Weston Road Weston, FL 33331	Home Purchase Loans Home Refinance Loans Loans to Businesses	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
MD 22744 Ft. Lauderdale-Pompano Beach-Deerfield Beach MD 33124 Miami-Miami Beach-Kendall MD 48424 West Palm Beach-Boca Raton-Boynton MSA 34940 Naples-Marco Island MSA 15980 Cape Coral-Ft. Myers MSA 19660 Deltona-Daytona Beach-Ormond Beach MSA 35840 North Port-Bradenton-Sarasota MSA 36740 Orlando-Kissimmee-Sanford MSA 37340 Palm Bay-Melbourne-Titusville MSA 38940 Port St. Lucie MSA 39460 Punta Gorda MSA 42680 Sebastian-Vero Beach MSA 45300 Tampa-St. Petersburg-Clearwater Non MSA- Hendry County	Full-Scope Full-Scope Full-Scope Full-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope Limited-Scope	

Appendix B: Market Profiles for Full-Scope Areas

MIAMI-FT. LAUDERDALE-PALM BEACH ASSESSMENT AREA (MSA 33100)

The full-scope assessment area consists of all of the Miami-Ft. Lauderdale-Palm Beach MSA, which includes all of the contiguous counties of Miami-Dade, Broward, and Palm Beach. The assessment area meets the requirements of the CRA regulation and does not arbitrarily exclude low- and moderate-income geographies.

Overall, the MSA has a total population of approximately 5.5 million people, with the largest concentration of population in the Miami-Dade County portion of the MSA. The Census Bureau has designated each of the three counties in the full-scope assessment area as a Metropolitan Division (“MD”). The accompanying tables and discussions focus on each of the MDs individually, as well as MSA 34940- Collier County a separate MSA.

MD 33124- Miami Dade County

Demographic Information for Full-Scope Area: MD 33124- Miami Dade County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	518	5.98	25.48	32.05	33.20	3.28
Population by Geography	2,496,435	5.06	26.89	34.46	33.01	0.58
Owner-Occupied Housing by Geography	480,532	1.67	19.87	35.55	42.90	0.01
Business by Geography	333,816	3.14	21.77	26.88	46.40	1.81
Farms by Geography	4,123	1.94	19.09	31.68	46.50	0.80
Family Distribution by Income Level	571,889	23.23	17.00	18.29	41.48	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	230,063	9.03	39.65	33.96	17.33	0.03
Median Family Income		50,065	Median Housing Value		295,738	
FFIEC Adjusted Median Family Income for 2016		48,100	Unemployment Rate (2010 US Census)		4.18%	
Households Below Poverty Level		18%				

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

Miami-Dade County contains approximately half of the Miami MSA’s population and several of its largest cities. The greatest concentration of low- and moderate-income geographies in the MSA are located in the City of Miami. The cost of living in the Miami-Dade MD remains high, even though there are indications of improvements in unemployment, real estate foreclosures, and other economic conditions during the evaluation period. According to the Bureau of Labor Statistics, unemployment as of December 31, 2016, was 5.4 percent for Miami-Dade County and has trended lower during the evaluation period with a rate of 5.8 percent for 2015 and 6.1 percent for 2014. However, the unemployment rate in Miami-Dade remained higher than both the state of Florida and the national unemployment rate of 4.9 percent and 4.7 percent, respectively, as of December 31, 2016.

Miami-Dade County was severely impacted by the housing crisis when home prices fell 50 percent or more from the highs of 2006, and condominium values declined 60 percent. Foreclosure rates have declined but remain high. According to a report compiled by real estate research company ATTOM Data Solutions, one of every 786 housing units in South Florida was in some stage of foreclosure in November 2016. While that rate is still relatively high, it has fallen nearly 18 percent compared to November 2015. Miami-Dade County had the largest share of distressed properties with 1,479 homes in the foreclosure pipeline. Broward County came in second with 1,012 housing units and Palm Beach County had 657. While home values continue to recover, Zillow.com reports that, as of the second quarter of 2016, 11.8 percent of homes with mortgages were in a negative equity position, which limits the owners' opportunity for mortgage refinancing.

As home values recover, home sales prices are rapidly increasing in the AA with the median sales price of a single-family home at \$280,000 for year-end 2015, increasing to \$315,000 as of third quarter 2016. The high sales prices make it difficult for LMI individuals to own a home in the AA without the help of loan subsidies. In addition, the high property taxes and the high cost of hazard and flood insurance in Florida add significant cost to owning a home. The decline in housing affordability isn't limited to home buyers. A 2016 study from the Federal Reserve Bank of Atlanta found that Miami was one of several large Southern metropolitan areas that experienced a significant decline in the availability of low-cost rental housing from 2010 to 2014. These factors contribute to Miami-Dade County having some of the highest levels of housing cost burden for families in the nation, spending greater than 30 percent of income on housing. The National Low Income Housing Coalition found that 26 percent of moderate-income families and 71 percent of low-income families in the Miami MSA are severely housing cost burdened.

Low- and moderate-income families have other challenges accessing homeownership, as private investors contribute to the overall decline in housing inventory, including affordable housing. These investors often buy homes with cash, making it difficult for LMI individuals to take advantage of lower cost homes on the market. In 2014, as high as 58 percent of home sales in the Miami-Dade MD were cash transactions. By mid-2016, this level declined, though still high at 48 percent of home sales.

During the evaluation period, the level of homeowner occupancy declined from approximately 58 percent to 49 percent. In low- and moderate-income geographies, the level of renter occupancy is high, representing 70 percent of housing units in low-income geographies and 51 percent of housing units in moderate-income geographies, based on 2010 Census data. These LMI geographies also represent high levels of households below the poverty level (44 percent and 27 percent, respectively), indicating an increasing demand for affordable rental housing.

Banking competition within the AA continues to be very intense. Based on FDIC data as of June 30, 2016, there were 65 financial institutions operating 670 banking offices in the Miami-Dade County AA, including branches of the largest banks in the country. Wells Fargo Bank and Bank of America dominate the market with 13.89 percent and 12.58 percent deposit market share, respectively. FCB ranks 21st in deposit market share at 0.67 percent. Competition for loans is even more intense since numerous mortgage companies also operate in the AA, and national credit card lenders compete for small business loans.

Major industries include real estate development, trade business with Latin America, and tourism. According to Dun and Bradstreet, there were 354,431 non-farm businesses in the Miami-Dade MD for

2015, of which 79.54 percent are considered to be small business. Small businesses are defined as having revenues of \$1 million or less. The majority (73.20 percent) of all non-farm businesses are concentrated in the County's middle- and upper-income geographies.

During the evaluation period, we contacted community development organizations in the Miami-Dade assessment area. The community contacts provided an assessment of the community's needs, opportunities in which financial institutions may participate in meeting those needs and information on the perception of financial institutions' involvement in the community. Contacts indicated a critical need for affordable housing in Miami-Dade County, including rental and owner-occupied units. Other credit needs noted include small business lending, particularly for start-up businesses.

Opportunities for community development lending, investments, and services are available. Larger institutions in the AA are very competitive for the qualified investments and loans that are available. Community development opportunities include working with and providing financing to organizations whose mission is to provide affordable housing and/or community services for low- and moderate-income families, as well as economic development. Mortgage-backed securities backed by mortgages to low- and moderate-income borrowers are an option either directly or through loan funds that make investments in mortgage-backed securities. However, due to the limited ability of low- and moderate-income borrowers to purchase housing in the AA, the availability of mortgage-backed securities has declined during the evaluation period.

MD 22744- Broward County

Demographic Information for Full-Scope Area: MD 22744- Broward County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	361	5.26	27.42	36.84	30.19	0.28
Population by Geography	1,748,066	4.13	28.90	35.76	31.21	0.00
Owner-Occupied Housing by Geography	463,511	1.73	27.32	37.11	33.84	0.00
Business by Geography	243,411	3.49	24.24	33.80	38.47	0.00
Farms by Geography	3,646	3.46	28.61	33.08	34.86	0.00
Family Distribution by Income Level	420,639	22.03	17.44	19.79	40.73	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	166,037	7.73	41.38	34.79	16.10	0.00
Median Family Income		62,619	Median Housing Value		267,849	
FFIEC Adjusted Median Family Income for 2016		60,900	Unemployment Rate (2010 US Census)		4.78%	
Households Below Poverty Level		12%				

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

Source: 2010 US Census and 2016 FFIEC updated MFI

The population continues to grow as 2010 US Census data indicates growth as the population totaled 1.7 million, increasing by 8 percent since the 2000 US Census. Based on the FFIEC estimated MFI, the average family income for the evaluation period was \$61,800 for 2014, \$63,300 for 2015, and \$60,900 for 2016. According to 2010 US Census data, low-income families represent 22 percent of the families in the County, while moderate-income families represent 17 percent of the County. Households below the poverty level totaled 12 percent.

The unemployment rate has fluctuated during the evaluation period with a high of 7.7 percent in January 2013, and trending lower at 4.8 percent as of December 2015, according to the Bureau of Labor Statistics. During the evaluation period, the Broward County unemployment rate remained below the state of Florida rate. The State unemployment rate was 5.1 percent as of December 31, 2015. According to more recent data from the Bureau of Labor and Statistics, the unemployment rate for the MSA was 4.7 percent as of December 31, 2016, an indication of continued improving economic conditions. The unemployment rate was lower than the State's rate of 4.9 percent and the same as the 4.7 percent national rate.

Home values have shown an increasing trend based on data from Zillow.com. The median home value was \$204,000 in December 2015, compared with \$176,000 in December 2014, and \$156,000 in December 2013. The high median cost makes it difficult for LMI families to own a home in the AA without the help of loan subsidies. The high cost of property taxes and insurance premiums also make the cost of homeownership more expensive. Additionally, competitive pressure from cash-paying investors who purchase lower priced homes limits the opportunities for LMI buyers.

During the evaluation period, the trend in foreclosures decreased but is still considered high; in Broward County one in every 690 homes based on June 2016 RealtyTrac statistics. June 2016 foreclosure filings in Broward County were one percent higher than the previous month but had declined by 39 percent when compared with the same time last year. The state of Florida ranks 3rd in the country for foreclosures with 1 in every 764 homes being foreclosed as of June 2016.

Major industries in the County include tourism, real estate development, trade business with Latin America, health care, financial services, and retail services. Small businesses are defined as having annual revenues of \$1 million or less. For 2015, non-farm businesses totaled 462,994, of which 82.28 percent were small businesses. The majority (75.67 percent) of the small businesses are concentrated in the County's middle- and upper-income geographies. Many small businesses have struggled to stay in business during the recession and the recovery period. Those businesses seeking loans, including new business owners, faced more stringent underwriting of their loans and documentation of creditworthiness from banks.

Strong competition exists for financial services within the Broward County AA. Per the June 30, 2016 FDIC Deposit Market Share Report, there are 50 depository financial institutions in Broward County operating 474 offices. The Bank's deposits in Broward County totaled \$1.6 billion with a market share of 3.13 percent. The Bank ranks 8th out of the depository financial institutions in the AA. The competition is comprised primarily of large nationwide and regional banks. The top five competitors in order of their ranking are Bank of America, NA; Wells Fargo Bank, NA; JPMorgan Chase Bank, NA; Citibank, NA; and SunTrust Bank. These competitors control 64.57 percent of the deposit share within this AA.

Community contacts indicated affordable housing and small business lending are the most pressing credit needs, as well as financial literacy counseling and support services for small business owners.

Opportunities for community development lending, investments, and services are available and similar to the discussions previously discussed under the Miami-Dade County market profile. Larger institutions in the AA are very competitive for the qualified investments and loans that are available.

MD 48424- Palm Beach County

Demographic Information for Full-Scope Area: MD 48424- Palm Beach County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	337	6.23	24.93	31.45	35.01	2.37
Population by Geography	1,320,134	4.88	26.01	33.30	35.59	0.22
Owner-Occupied Housing by Geography	384,995	2.96	22.08	36.12	38.83	0.00
Business by Geography	187,345	3.67	18.64	31.67	45.75	0.28
Farms by Geography	4,215	3.58	21.04	30.15	45.15	0.07
Family Distribution by Income Level	324,849	21.50	17.84	18.93	41.73	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	127,797	8.13	36.53	34.23	21.11	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below Poverty Level		64,445 65,400 11%	Median Housing Value Unemployment Rate (2010 US Census)		288,519 4.38%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 US Census and 2016 FFIEC updated MFI

Palm Beach County has a combination of urban and rural LMI markets with differing economics. Clusters of low- and moderate-income geographies can be found in cities such as West Palm Beach, Riviera Beach, Lake Worth, and Boynton Beach along the eastern boundaries of the county, as well as inland in rural areas around Lake Okeechobee such as Belle Glade and Pahokee.

Much of the data and economic conditions cited for the Miami-Dade County MD also cover the Palm Beach County MD. Palm Beach County was severely impacted by the housing crisis. Several years have passed, but Palm Beach County continues to recover from the crisis. Data from the Bureau of Labor Statistics shows that from 2013 to December 2016, the unemployment rate for the Palm Beach MD decreased from 6.1 percent to 4.7 percent as the economy continues to recover from the housing crisis and recession. The December 2016 unemployment rate is slightly below the State unemployment rate of 4.9 percent and the same as the national unemployment rate of 4.7 percent.

Retiree in-migration has surpassed expectations and is expected to continue to accelerate as increases in asset prices have rebuilt household wealth resulting in the ability to retire. Due to this increasing retiree population, the assessment area's economy is largely based in the healthcare services, hospitality and retail sectors.

Housing costs are high with the median sales price of a single-family home of \$228,000 in June 2013, increasing to \$314,000 as of June 2016 according to an assessment by Zillow.com. In low- and moderate-income geographies, the level of renter occupancy is moderate, representing 39 percent of housing units in low-income geographies and 29 percent of housing units in moderate-income geographies, based on 2010 Census data. These geographies also represent elevated levels of households below the poverty level (29 percent and 17 percent, respectively), indicating a demand for affordable rental housing.

Palm Beach County is home to two Fortune 500 companies and a wide range of corporate, regional and

divisional headquarters. Major employers in the AA include local governments, Publix Supermarkets, Tenet Healthcare, FP&L, Wackenhut, Office Depot, area hospitals and Florida Atlantic University.

Leading industries include state and local government, restaurants, hospitals, physicians and grocery stores. In addition, the Port of Palm Beach was the second fastest-growing port in the United States in 2015.

Banking competition within Palm Beach County is high. In addition to community and mid-size banks, branches of the largest banks in the country operate in Palm Beach County. As of June 30, 2016, there were 57 deposit taking financial institutions in the county operating 475 branches. FCB has a deposit market share of 1.65 percent and is ranked 12th in the market. The deposit market share continues to be dominated by Wells Fargo Bank, NA, and Bank of America, NA, as discussed in the Lending Activity portion of this Evaluation.

Community contacts indicated credit needs include small business lending, particularly for start-up businesses, and financial literacy counseling and support services for small business owners.

Opportunities for community development lending, investments, and services are available and similar to the discussion under the Miami-Dade County market profile. Larger institutions in the AA are very competitive for the qualified investments and loans that are available.

MSA 34940 Collier County

Demographic Information for Full-Scope Area: MSA 34940 Collier County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	73	8.22	20.55	38.36	32.88	0.00
Population by Geography	321,520	9.05	20.27	43.40	27.27	0.00
Owner-Occupied Housing by Geography	91,397	2.40	16.42	46.03	35.15	0.00
Business by Geography	43,790	2.71	13.17	41.93	42.19	0.00
Farms by Geography	1,183	5.66	18.60	49.62	26.12	0.00
Family Distribution by Income Level	81,135	21.14	18.31	19.04	41.50	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	32,010	10.31	27.24	44.01	18.44	0.00
Median Family Income		68,556	Median Housing Value		427,396	
FFIEC Adjusted Median Family Income for 2016		65,700	Unemployment Rate (2010 US Census)		3.36%	
Households Below Poverty Level		9%				

Source: 2010 US Census and 2016 FFIEC updated MFI

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

Metropolitan Statistical Area (MSA) 34940 Naples-Marco Island is comprised of Collier County. Based on the 2010 Census, the county consists of 73 census tracts or geographies, as compared to the 2000 Census, which consisted of 52 census tracts. The 73 census tracts are comprised of six (8%) low-income, 15 (21%) moderate-income, 28 (38%) middle-income, and 24 (33%) upper-income geographies. The greatest concentration of low- and moderate-income geographies can be found in the southern part of the county, around Immokalee and Everglades City. These areas are rural and have an agricultural base.

According to the 2010 Census, the total population of Collier County is 321,520, which grew by 28 percent when compared to the 2000 Census population of 251,377. The FFIEC Adjusted Median Family Income for Collier County in 2014, 2015, and 2016, was \$62,900, \$66,500, and \$65,700, respectively, one of the highest in Florida. For the county overall, nine percent of the population lives below the poverty level, according to the Census Bureau. These levels of poverty reduce the opportunities for mortgage lending to low-income and very low-income borrowers.

As with most metropolitan areas in Florida, the economy in the AA has experienced a downturn due to the national and local recession but is in recovery. Housing prices have declined significantly since the highs of 2006. Reports indicate that by September 2013, home prices declined 45 percent to a median value of approximately \$291,000 and condominium prices declined 49 percent to a median value of \$192,000. With subsidizes and other forms of assistance, some low- and moderate-income families can afford to purchase a home in the county, but economic conditions are causing the availability of these assistance programs to decline.

The economy of the AA is based on tourism. Employment opportunities are focused in the services industry, trade and transportation industry, and leisure and hospitality. However, as with the entire state of Florida, Collier County has experienced job losses, and a volatile housing market with a record

number of delinquencies, foreclosures, and bankruptcies. The unemployment rate reached 11.6 percent in December 2011 according to the Bureau of Labor Statistics, but has declined to 4.5 percent as of December 2016, indicating recovery in the local economy. Naples Community Hospital is the largest employer in Collier County, followed by Wal-Mart and Allen Systems Group.

Banking competition within Collier County is high. In addition to community and mid-size banks, branches of the largest banks in the country operate in Collier County. As of June 30, 2016, according to the Federal Deposit Insurance Corporation (FDIC) website, there were 39 deposit taking financial institutions in Collier County operating 156 branches. FCB had a deposit market share of 3.55 percent and ranked 9th overall. Fifth Third Bank, KeyBank, NA, Wells Fargo Bank, NA, and Bank of America, NA dominate the market area.

Opportunities for community development lending, investments, and services are limited. Larger institutions in the AA are very competitive for the qualified investments and loans that are available. Community development opportunities include working with and providing financing to organizations whose mission is to provide affordable housing and/or community services for low- and moderate-income families, as well as economic development. Mortgage-backed securities backed by mortgages to low- and moderate-income borrowers are an option either directly or through loan funds that make investments in mortgage-backed securities. However, due to the limited ability of low- and moderate-income borrowers to purchase housing in the AA, the availability of mortgage-backed securities has declined during the evaluation period.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

Table 1. Lending Volume - Presents the number and dollar amount of reportable loans originated and purchased by the Bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the Bank’s assessment area may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 1. Other Products - Presents the number and dollar amount of any unreported category of loans originated and purchased by the Bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.

Table 2. Geographic Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans - See Table 2.

Table 5. Geographic Distribution of Multifamily Loans - Compares the percentage distribution of the number of multifamily loans originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 6. Geographic Distribution of Small Loans to Businesses - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage

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

Table 7. Geographic Distribution of Small Loans to Farms - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the Bank's assessment area.

Table 8. Borrower Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the Bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

Table 9. Borrower Distribution of Home Improvement Loans - See Table 8.

Table 10. Borrower Distribution of Refinance Loans - See Table 8.

Table 11. Borrower Distribution of Small Loans to Businesses - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the Bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the Bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

Table 12. Borrower Distribution of Small Loans to Farms - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the Bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the Bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the Bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the Bank in each MA/AA. The table separately presents investments made during prior

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

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the Bank's assessment area. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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

Institution ID: FLORIDA COMMUNITY BANK, N.A.

Table 1. Lending Volume

LENDING VOLUME												
Geography: FLORIDA												
Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016												
Assessment Area (2016):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
MD 22744- Broward County	8.04	277	183,221	51	24,824	0	0	5	8,221	333	216,266	8.21
MD 33124- Miami Dade County	10.23	290	251,160	110	36,861	0	0	24	195,411	424	483,432	14.83
MD 48424- Palm Beach County	5.45	206	167,914	17	8,401	0	0	3	4,436	226	180,751	12.50
MSA 34940 Collier County	22.88	850	639,280	91	35,632	4	835	3	3,348	948	679,095	23.74
Limited Review:												
MSA 15980- Lee County	25.35	971	351,127	75	24,029	3	377	3	4,119	1,052	379,652	7.13
MSA 19660- Volusia County (Partial)	2.66	82	17,328	28	5,837	0	0	0	0	110	23,165	3.87
MSA 35840 Sarasota County (Partial)	2.82	107	61,277	10	4,065	0	0	0	0	117	65,342	7.52
MSA 36740- Orange-Seminole	8.64	289	145,640	61	22,398	5	757	3	950	358	170,695	6.74
MSA 37340- Brevard County	2.66	89	50,571	16	6,586	0	0	5	20,150	110	77,307	3.46
MSA 38940- Martin-St Lucie Counties	3.52	103	29,971	39	6,976	0	0	4	21,375	146	358,322	4.83
MSA 39460- Charlotte County	4.66	174	23,705	19	3,534	0	0	0	0	193	27,239	2.87
MSA 42680- Indian River County	0.65	25	12,652	2	506	0	0	0	0	27	13,158	1.10
MSA 45300-Hernando-Hillsborough Counties (Partial)	1.52	57	70,217	4	1,104	0	0	3	6,188	63	77,509	1.94
Non MSA- Hendry County	0.87	13	1,624	11	1,171	8	751	2	580	36	4,706	1.28

* Loan Data as of December 31, 2016. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from October 16, 2013 to March 5, 2017.

*** Deposit Data as of December 31, 2016. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: FLORIDA COMMUNITY BANK, N.A.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
MD 22744- Broward County	205	7.10	1.73	0.98	27.32	22.93	37.11	30.73	33.84	45.37	0.19	0.00	0.18	0.21	0.17	
MD 33124- Miami Dade County	186	6.44	1.67	4.30	19.87	16.67	35.56	30.11	42.90	48.92	0.15	0.00	0.22	0.08	0.19	
MD 48424- Palm Beach County	155	5.37	2.96	1.94	22.08	13.55	36.12	25.16	38.83	59.35	0.18	0.28	0.20	0.13	0.23	
MSA 34940 Collier County	700	24.24	2.40	0.43	16.42	5.14	46.03	37.57	35.15	56.86	3.12	0.52	1.04	2.29	5.70	
Limited Review:																
MSA 15980- Lee County	871	30.16	1.32	1.03	14.17	9.53	55.62	35.59	28.89	53.85	2.05	3.30	1.54	1.32	3.43	
MSA 19660- Volusia County (Partial)	72	2.49	1.29	0.00	14.90	4.17	54.72	25.00	29.09	70.83	0.21	0.00	0.10	0.08	0.43	
MSA 35840 Sarasota County (Partial)	89	3.08	0.45	1.12	17.00	34.83	51.25	25.84	31.31	38.20	0.16	0.00	0.10	0.06	0.35	
MSA 36740- Orange-Seminole	248	8.59	0.39	0.00	16.76	4.03	36.45	31.85	46.40	64.11	0.30	0.00	0.08	0.26	0.38	
MSA 37340- Brevard County	59	2.04	1.18	0.00	18.83	10.17	46.92	15.25	33.06	74.58	0.18	0.00	0.17	0.03	0.38	
MSA 38940- Martin-St Lucie Counties	61	2.11	1.02	0.00	14.71	4.92	57.46	42.62	26.81	52.46	0.32	0.00	0.15	0.21	0.59	
MSA 39460- Charlotte County	160	5.54	0.00	0.00	6.26	10.00	76.48	80.00	17.26	10.00	2.12	0.00	5.56	2.20	0.72	
MSA 42680- Indian River County	21	0.73	1.08	0.00	11.88	19.05	58.73	19.05	28.31	61.90	0.17	0.00	0.37	0.11	0.26	
MSA 45300-Hernando-Hillsborough Counties (Partial)	49	1.70	2.69	0.00	21.17	0.00	41.31	22.45	34.82	77.55	0.04	0.00	0.00	0.02	0.08	
Non MSA- Hendry County	12	0.42	0.00	0.00	35.31	41.67	64.69	58.33	0.00	0.00	4.23	0.00	6.06	3.40	0.00	

* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

Institution ID: FLORIDA COMMUNITY BANK, N.A.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
MD 22744- Broward County	16	16.00	1.73	0.00	27.32	0.00	37.11	31.25	33.84	68.75	0.07	0.00	0.00	0.19	0.00	
MD 33124- Miami Dade County	9	9.00	1.67	0.00	19.87	0.00	35.56	11.11	42.90	88.89	0.06	0.00	0.00	0.00	0.12	
MD 48424- Palm Beach County	9	9.00	2.96	0.00	22.08	0.00	36.12	11.11	38.83	88.89	0.28	0.00	0.00	0.19	0.44	
MSA 34940 Collier County	14	14.00	2.40	0.00	16.42	7.14	46.03	14.29	35.15	78.57	0.57	0.00	0.00	0.00	2.33	
Limited Review:																
MSA 15980- Lee County	12	12.00	1.32	0.00	14.17	0.00	55.62	50.00	28.89	50.00	0.72	0.00	0.00	0.80	0.86	
MSA 19660- Volusia County (Partial)	2	2.00	1.29	0.00	14.90	0.00	54.72	0.00	29.09	100.00	0.16	0.00	0.00	0.00	0.49	
MSA 35840- Sarasota County (Partial)	1	1.00	0.45	0.00	17.00	0.00	51.25	100.00	31.31	0.00	0.21	0.00	0.00	0.39	0.00	
MSA 36740- Orange-Seminole	7	7.00	0.39	0.00	16.76	0.00	36.45	0.00	46.40	100.00	0.28	0.00	0.00	0.00	0.51	
MSA 37340- Brevard County	9	9.00	1.18	0.00	18.83	22.22	46.92	22.22	33.06	55.56	0.63	0.00	0.96	0.00	1.18	
MSA 38940- Martin-St Lucie Counties	16	16.00	1.02	6.25	14.71	12.50	57.46	75.00	26.81	6.25	0.56	33.33	1.85	0.30	0.00	
MSA 39460- Charlotte County	3	3.00	0.00	0.00	6.26	0.00	76.48	100.00	17.26	0.00	0.50	0.00	0.00	0.63	0.00	
MSA 42680- Indian River County	1	1.00	1.08	0.00	11.88	0.00	58.73	100.00	28.31	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 45300-Hernando-Hillsborough Counties (Partial)	1	1.00	2.69	0.00	21.17	0.00	41.31	0.00	34.82	100.00	0.00	0.00	0.00	0.00	0.00	
Non MSA- Hendry County	0	0.00	0.00	0.00	35.31	0.00	64.69	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2015 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)

Institution ID: FLORIDA COMMUNITY BANK, N.A.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
MD 22744- Broward County	54	10.53	1.73	0.00	27.32	11.11	37.11	27.78	33.84	61.11	0.10	0.00	0.11	0.07	0.13	
MD 33124- Miami Dade County	80	15.59	1.67	0.00	19.87	10.00	35.56	13.75	42.90	76.25	0.16	0.00	0.06	0.12	0.21	
MD 48424- Palm Beach County	38	7.41	2.96	2.63	22.08	0.00	36.12	28.95	38.83	68.42	0.08	0.00	0.00	0.06	0.11	
MSA 34940 Collier County	136	26.51	2.40	1.47	16.42	2.94	46.03	38.24	35.15	57.35	1.06	1.79	0.55	0.75	1.70	
Limited Review:																
MSA 15980- Lee County	86	16.76	1.32	0.00	14.17	6.98	55.62	33.72	28.89	59.30	0.37	0.00	0.47	0.15	0.71	
MSA 19660- Volusia County (Partial)	8	1.56	1.29	0.00	14.90	12.50	54.72	12.50	29.09	75.00	0.07	0.00	0.00	0.00	0.18	
MSA 35840 Sarasota County (Partial)	16	3.12	0.45	0.00	17.00	12.50	51.25	37.50	31.31	50.00	0.11	0.00	0.19	0.04	0.20	
MSA 36740- Orange-Seminole	34	6.63	0.39	2.94	16.76	5.88	36.45	20.59	46.40	70.59	0.06	0.00	0.06	0.04	0.07	
MSA 37340- Brevard County	14	2.73	1.18	0.00	18.83	21.43	46.92	42.86	33.06	35.71	0.12	0.00	0.39	0.08	0.08	
MSA 38940- Martin-St Lucie Counties	25	4.87	1.02	0.00	14.71	0.00	57.46	80.00	26.81	20.00	0.09	0.00	0.00	0.11	0.08	
MSA 39460- Charlotte County	11	2.14	0.00	0.00	6.26	0.00	76.48	81.82	17.26	18.18	0.17	0.00	0.00	0.15	0.29	
MSA 42680- Indian River County	3	0.58	1.08	0.00	11.88	0.00	58.73	66.67	28.31	33.33	0.00	0.00	0.00	0.00	0.00	
MSA 45300-Hernando-Hillsborough Counties (Partial)	7	1.36	2.69	0.00	21.17	14.29	41.31	42.86	34.82	42.86	0.01	0.00	0.06	0.00	0.02	
Non MSA- Hendry County	1	0.19	0.00	0.00	35.31	100.00	64.69	0.00	0.00	0.00	1.12	0.00	4.35	0.00	0.00	

* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

Institution ID: FLORIDA COMMUNITY BANK, N.A.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
MD 22744- Broward County	2	6.45	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 33124- Miami Dade County	14	45.16	8.41	14.29	28.73	42.86	32.26	28.57	30.60	14.29	1.02	1.85	0.78	1.37	0.00	
MD 48424- Palm Beach County	4	12.90	6.39	0.00	31.55	25.00	33.58	25.00	28.47	50.00	1.02	0.00	2.78	0.00	0.00	
MSA 34940 Collier County	0	0.00	3.02	0.00	13.85	0.00	39.45	0.00	43.68	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
MSA 15980- Lee County	2	6.45	7.80	0.00	15.02	0.00	39.74	50.00	37.44	50.00	2.27	0.00	0.00	0.00	8.33	
MSA 19660- Volusia County (Partial)	0	0.00	7.93	0.00	27.19	0.00	35.93	0.00	28.96	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 35840 Sarasota County (Partial)	1	3.23	0.78	0.00	14.20	0.00	31.59	0.00	53.43	100.00	0.00	0.00	0.00	0.00	0.00	
MSA 36740- Orange-Seminole	0	0.00	2.05	0.00	40.91	0.00	38.98	0.00	18.07	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 37340- Brevard County	7	22.58	5.84	0.00	24.02	14.29	44.56	85.71	25.58	0.00	5.56	0.00	0.00	16.67	0.00	
MSA 38940- Martin-St Lucie Counties	1	3.23	1.24	0.00	19.26	0.00	41.19	100.00	38.31	0.00	7.69	0.00	0.00	14.29	0.00	
MSA 39460- Charlotte County	0	0.00	0.00	0.00	10.92	0.00	69.38	0.00	19.69	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 42680- Indian River County	0	0.00	5.15	0.00	12.59	0.00	44.81	0.00	37.45	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 45300-Hernando-Hillsborough Counties (Partial)	0	0.00	6.89	0.00	32.45	0.00	35.28	0.00	25.38	0.00	0.00	0.00	0.00	0.00	0.00	
Non MSA- Hendry County	0	0.00	0.00	0.00	32.23	0.00	67.77	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2015 Peer Mortgage Data -- US and PR

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

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

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

Institution ID: FLORIDA COMMUNITY BANK, N.A.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
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**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
Full Review:																
MD 22744- Broward County	51	9.75	3.49	7.84	24.24	21.57	33.80	31.37	38.47	39.22	0.03	0.05	0.02	0.04	0.03	
MD 33124- Miami Dade County	99	18.93	3.14	3.03	21.77	21.21	26.88	20.20	46.40	55.56	0.05	0.08	0.02	0.05	0.06	
MD 48424- Palm Beach County	17	3.25	3.67	11.76	18.64	17.65	31.67	11.76	45.75	58.82	0.00	0.00	0.00	0.00	0.01	
MSA 34940 Collier County	91	17.40	2.71	13.19	13.17	10.99	41.93	34.07	42.19	41.76	0.28	2.16	0.25	0.30	0.18	
Limited Review:																
MSA 15980- Lee County	75	14.34	3.62	17.33	14.68	24.00	51.54	37.33	30.01	21.33	0.18	0.63	0.30	0.17	0.11	
MSA 19660- Volusia County (Partial)	28	5.35	3.41	10.71	20.25	17.86	45.75	42.86	30.59	28.57	0.07	0.00	0.06	0.05	0.12	
MSA 35840 Sarasota County (Partial)	10	1.91	0.53	0.00	20.55	20.00	42.10	10.00	36.82	70.00	0.02	0.00	0.00	0.00	0.04	
MSA 36740- Orange-Seminole	61	11.66	0.65	1.64	21.06	39.34	33.57	31.15	44.72	27.87	0.06	0.00	0.14	0.06	0.02	
MSA 37340- Brevard County	16	3.06	1.88	0.00	22.32	18.75	41.89	37.50	33.87	43.75	0.07	0.00	0.09	0.08	0.06	
MSA 38940- Martin-St Lucie Counties	39	7.46	1.73	2.56	18.90	30.77	52.33	56.41	26.91	10.26	0.15	0.00	0.22	0.15	0.10	
MSA 39460- Charlotte County	19	3.63	0.00	0.00	6.71	5.26	79.12	84.21	14.17	10.53	0.11	0.00	0.00	0.15	0.00	
MSA 42680- Indian River County	2	0.38	5.16	50.00	8.93	0.00	55.52	50.00	30.17	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 45300-Hernando-Hillsborough Counties (Partial)	4	0.76	4.25	50.00	21.87	25.00	35.24	25.00	38.36	0.00	0.01	0.14	0.00	0.00	0.00	
Non MSA- Hendry County	11	2.10	0.00	0.00	31.00	54.55	69.00	45.45	0.00	0.00	0.81	0.00	0.89	0.84	0.00	

* Based on 2015 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2016).

Institution ID: FLORIDA COMMUNITY BANK, N.A.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share (%) by Geography*				
Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans						
Full Review:																
MD 22744- Broward County	0	0.00	3.46	0.00	28.61	0.00	33.08	0.00	34.86	0.00	0.00	0.00	0.00	0.00	0.00	
MD 33124- Miami Dade County	0	0.00	1.94	0.00	19.09	0.00	31.68	0.00	46.50	0.00	0.00	0.00	0.00	0.00	0.00	
MD 48424- Palm Beach County	0	0.00	3.58	0.00	21.04	0.00	30.15	0.00	45.15	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 34940 Collier County	4	20.00	5.66	0.00	18.60	0.00	49.62	100.00	26.12	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
MSA 15980- Lee County	3	15.00	1.49	0.00	17.55	0.00	55.12	66.67	25.76	33.33	2.22	0.00	0.00	4.55	0.00	
MSA 19660- Volusia County (Partial)	0	0.00	1.64	0.00	15.84	0.00	52.82	0.00	29.70	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 35840 Sarasota County (Partial)	0	0.00	0.58	0.00	16.81	0.00	47.97	0.00	34.64	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 36740- Orange-Seminole	5	25.00	0.60	0.00	18.33	0.00	37.39	0.00	43.69	100.00	1.79	0.00	0.00	0.00	3.13	
MSA 37340- Brevard County	0	0.00	1.56	0.00	22.33	0.00	45.03	0.00	31.08	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 38940- Martin-St Lucie Counties	0	0.00	1.38	0.00	22.89	0.00	50.19	0.00	25.53	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 39460- Charlotte County	0	0.00	0.00	0.00	6.49	0.00	75.61	0.00	17.89	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 42680- Indian River County	0	0.00	2.61	0.00	16.86	0.00	61.44	0.00	18.82	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 45300-Hernando-Hillsborough Counties (Partial)	0	0.00	2.53	0.00	20.27	0.00	41.79	0.00	35.41	0.00	0.00	0.00	0.00	0.00	0.00	
Non MSA- Hendry County	8	40.00	0.00	0.00	46.78	50.00	53.22	50.00	0.00	0.00	36.36	0.00	25.00	60.00	0.00	

* Based on 2015 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2016).

Institution ID: FLORIDA COMMUNITY BANK, N.A.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share*				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families*	% BANK Loans****	% Families ¹	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
MD 22744- Broward County	205	7.10	22.03	6.77	17.44	20.31	19.79	11.46	40.73	61.46	0.21	0.54	0.29	0.17	0.18	
MD 33124- Miami Dade County	187	6.47	23.23	4.00	17.00	16.57	18.29	19.43	41.48	60.00	0.17	1.43	0.20	0.17	0.15	
MD 48424- Palm Beach County	155	5.37	21.50	2.63	17.84	4.61	18.93	8.55	41.73	84.21	0.22	0.13	0.03	0.07	0.34	
MSA 34940 Collier County	700	24.23	21.14	0.29	18.31	4.51	19.04	5.67	41.50	89.53	3.67	0.00	1.08	1.24	4.90	
Limited Review:																
MSA 15980- Lee County	871	30.15	18.96	6.53	18.96	9.91	21.42	6.64	40.66	76.92	2.38	4.50	1.50	0.69	3.12	
MSA 19660- Volusia County (Partial)	72	2.49	19.96	4.23	17.98	9.86	21.73	14.08	40.34	71.83	0.24	0.00	0.12	0.20	0.33	
MSA 35840 Sarasota County (Partial)	89	3.08	18.22	28.57	18.66	20.24	21.32	4.76	41.80	46.43	0.15	0.00	0.00	0.11	0.23	
MSA 36740- Orange-Seminole	248	8.58	19.31	1.22	17.54	2.45	19.98	5.71	43.17	90.61	0.36	0.09	0.10	0.02	0.59	
MSA 37340- Brevard County	59	2.04	19.36	0.00	18.76	1.75	21.46	5.26	40.42	92.98	0.22	0.00	0.00	0.00	0.46	
MSA 38940- Martin-St Lucie Counties	61	2.11	18.62	3.33	20.11	11.67	20.32	10.00	40.95	75.00	0.38	0.00	0.41	0.11	0.50	
MSA 39460- Charlotte County	160	5.54	16.43	47.44	19.62	21.15	25.30	6.41	38.65	25.00	2.40	21.91	1.96	0.79	0.28	
MSA 42680- Indian River County	21	0.73	20.32	0.00	16.98	0.00	21.98	4.76	40.72	95.24	0.20	0.00	0.00	0.00	0.37	
MSA 45300-Hernando-Hillsborough Counties (Partial)	49	1.70	21.11	4.26	18.08	6.38	18.90	2.13	41.90	87.23	0.05	0.00	0.00	0.00	0.10	
Non MSA- Hendry County	12	0.42	23.25	8.33	24.43	41.67	19.80	8.33	32.52	41.67	4.86	14.29	10.00	1.85	3.57	

* Based on 2015 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 2.5% of loans originated and purchased by bank.

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

Institution ID: FLORIDA COMMUNITY BANK, N.A.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share*				
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**	% Families**	% BANK Loans****	% Families ²	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
MD 22744- Broward County	16	16.00	22.03	0.00	17.44	6.25	19.79	6.25	40.73	87.50	0.08	0.00	0.61	0.00	0.00	
MD 33124- Miami Dade County	9	9.00	23.23	0.00	17.00	0.00	18.29	0.00	41.48	100.00	0.07	0.00	0.00	0.00	0.10	
MD 48424- Palm Beach County	9	9.00	21.50	11.11	17.84	11.11	18.93	22.22	41.73	55.56	0.30	0.00	0.00	0.34	0.39	
MSA 34940 Collier County	14	14.00	21.14	0.00	18.31	7.14	19.04	7.14	41.50	85.71	0.61	0.00	0.00	0.00	1.18	
Limited Review:																
MSA 15980- Lee County	12	12.00	18.96	8.33	18.96	8.33	21.42	8.33	40.66	75.00	0.76	0.00	0.71	0.59	0.95	
MSA 19660- Volusia County (Partial)	2	2.00	19.96	50.00	17.98	0.00	21.73	0.00	40.34	50.00	0.16	1.43	0.00	0.00	0.00	
MSA 35840 Sarasota County (Partial)	1	1.00	18.22	0.00	18.66	100.00	21.32	0.00	41.80	0.00	0.22	0.00	1.12	0.00	0.00	
MSA 36740- Orange-Seminole	7	7.00	19.31	0.00	17.54	0.00	19.98	16.67	43.17	83.33	0.24	0.00	0.00	0.32	0.30	
MSA 37340- Brevard County	9	9.00	19.36	0.00	18.76	22.22	21.46	22.22	40.42	55.56	0.68	0.00	0.00	0.81	1.08	
MSA 38940- Martin-St Lucie Counties	16	16.00	18.62	6.25	20.11	31.25	20.32	31.25	40.95	31.25	0.59	2.94	0.00	0.76	0.38	
MSA 39460- Charlotte County	3	3.00	16.43	33.33	19.62	33.33	25.30	33.33	38.65	0.00	0.52	4.55	0.00	0.00	0.00	
MSA 42680- Indian River County	1	1.00	20.32	0.00	16.98	0.00	21.98	0.00	40.72	100.00	0.00	0.00	0.00	0.00	0.00	
MSA 45300-Hernando-Hillsborough Counties (Partial)	1	1.00	21.11	0.00	18.08	0.00	18.90	0.00	41.90	100.00	0.00	0.00	0.00	0.00	0.00	
Non MSA- Hendry County	0	0.00	23.25	0.00	24.43	0.00	19.80	0.00	32.52	0.00	0.00	0.00	0.00	0.00	0.00	

Institution ID: FLORIDA COMMUNITY BANK, N.A. (10000024947) (Included)

* Based on 2015 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 Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 1.0% of loans originated and purchased by bank.

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

Institution ID: FLORIDA COMMUNITY BANK, N.A.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					Market Share*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families ³	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
MD 22744- Broward County	54	10.53	22.03	0.00	17.44	2.50	19.79	12.50	40.73	85.00	0.08	0.00	0.00	0.04	0.12	
MD 33124- Miami Dade County	80	15.59	23.23	1.64	17.00	1.64	18.29	6.56	41.48	90.16	0.11	0.22	0.00	0.00	0.13	
MD 48424- Palm Beach County	38	7.41	21.50	0.00	17.84	2.94	18.93	11.76	41.73	85.29	0.10	0.00	0.00	0.04	0.15	
MSA 34940 Collier County	136	26.51	21.14	0.00	18.31	3.97	19.04	7.14	41.50	88.89	1.15	0.00	0.21	0.59	1.63	
Limited Review:																
MSA 15980- Lee County	86	16.76	18.96	0.00	18.96	9.76	21.42	15.85	40.66	74.39	0.45	0.00	0.44	0.08	0.64	
MSA 19660- Volusia County (Partial)	8	1.56	19.96	0.00	17.98	0.00	21.73	0.00	40.34	100.00	0.09	0.00	0.00	0.00	0.16	
MSA 35840 Sarasota County (Partial)	16	3.12	18.22	7.14	18.66	7.14	21.32	7.14	41.80	78.57	0.11	0.00	0.00	0.00	0.21	
MSA 36740- Orange-Seminole	34	6.63	19.31	0.00	17.54	3.33	19.98	6.67	43.17	90.00	0.07	0.00	0.00	0.00	0.12	
MSA 37340- Brevard County	14	2.73	19.36	7.69	18.76	0.00	21.46	23.08	40.42	69.23	0.13	0.00	0.00	0.20	0.18	
MSA 38940- Martin-St Lucie Counties	25	4.87	18.62	4.55	20.11	31.82	20.32	9.09	40.95	54.55	0.12	0.00	0.21	0.00	0.16	
MSA 39460- Charlotte County	11	2.14	16.43	9.09	19.62	36.36	25.30	27.27	38.65	27.27	0.21	0.00	0.35	0.27	0.16	
MSA 42680- Indian River County	3	0.58	20.32	0.00	16.98	33.33	21.98	0.00	40.72	66.67	0.00	0.00	0.00	0.00	0.00	
MSA 45300-Hernando-Hillsborough Counties (Partial)	7	1.36	21.11	0.00	18.08	50.00	18.90	0.00	41.90	50.00	0.00	0.00	0.00	0.00	0.00	
Non MSA- Hendry County	1	0.19	23.25	0.00	24.43	0.00	19.80	0.00	32.52	100.00	1.45	0.00	0.00	0.00	2.56	

* Based on 2015 Peer Mortgage Data -- US and PR

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 12.9% of loans originated and purchased by bank.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: FLORIDA COMMUNITY BANK, N.A.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016				
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
Full Review:									
MD 22744- Broward County	51	9.55	90.77	37.25	7.84	27.45	64.71	0.03	0.02
MD 33124- Miami Dade County	110	20.60	90.71	45.45	20.91	30.91	48.18	0.05	0.04
MD 48424- Palm Beach County	17	3.18	90.64	70.59	23.53	11.76	64.71	0.00	0.01
MSA 34940 Collier County	91	17.04	90.72	35.16	19.78	24.18	56.04	0.28	0.23
Limited Review:									
MSA 15980- Lee County	75	14.04	89.80	49.33	33.33	20.00	46.67	0.18	0.21
MSA 19660- Volusia County (Partial)	28	5.24	90.36	64.29	50.00	25.00	25.00	0.07	0.09
MSA 35840 Sarasota County (Partial)	10	1.87	90.92	70.00	10.00	20.00	70.00	0.02	0.01
MSA 36740- Orange-Seminole	61	11.42	88.63	32.79	22.95	18.03	59.02	0.06	0.05
MSA 37340- Brevard County	16	3.00	88.80	56.25	12.50	25.00	62.50	0.07	0.08
MSA 38940- Martin-St Lucie Counties	39	7.30	90.44	53.85	64.10	15.38	20.51	0.15	0.17
MSA 39460- Charlotte County	19	3.56	91.44	42.11	42.11	36.84	21.05	0.11	0.10
MSA 42680- Indian River County	2	0.37	91.08	0.00	50.00	0.00	50.00	0.00	0.00
MSA 45300-Hernando-Hillsborough Counties (Partial)	4	0.75	88.67	75.00	25.00	25.00	50.00	0.01	0.01
Non MSA- Hendry County	11	2.06	85.99	18.18	63.64	27.27	9.09	0.81	0.00

* Based on 2015 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 - 2016).

**** 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 3.56% of small loans to businesses originated and purchased by the bank.

Institution ID: FLORIDA COMMUNITY BANK, N.A. (10000024947) (Included)

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS									
Geography: FLORIDA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016					
Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$500,000	All	Rev\$ 1 Million or Less
Full Review:									
MD 22744- Broward County	0	0.00	97.07	0.00	0.00	0.00	0.00	0.00	0.00
MD 33124- Miami Dade County	0	0.00	96.17	0.00	0.00	0.00	0.00	0.00	0.00
MD 48424- Palm Beach County	0	0.00	95.52	0.00	0.00	0.00	0.00	0.00	0.00
MSA 34940 Collier County	4	20.00	93.83	100.00	25.00	50.00	25.00	0.00	0.00
Limited Review:									
MSA 15980- Lee County	3	15.00	96.62	66.67	33.33	66.67	0.00	2.22	0.00
MSA 19660- Volusia County (Partial)	0	0.00	97.32	0.00	0.00	0.00	0.00	0.00	0.00
MSA 35840 Sarasota County (Partial)	0	0.00	97.25	0.00	0.00	0.00	0.00	0.00	0.00
MSA 36740- Orange-Seminole	5	25.00	95.30	0.00	40.00	40.00	20.00	1.79	0.00
MSA 37340- Brevard County	0	0.00	97.44	0.00	0.00	0.00	0.00	0.00	0.00
MSA 38940- Martin-St Lucie Counties	0	0.00	95.35	0.00	0.00	0.00	0.00	0.00	0.00
MSA 39460- Charlotte County	0	0.00	97.37	0.00	0.00	0.00	0.00	0.00	0.00
MSA 42680- Indian River County	0	0.00	94.25	0.00	0.00	0.00	0.00	0.00	0.00
MSA 45300-Hernando-Hillsborough Counties (Partial)	0	0.00	95.41	0.00	0.00	0.00	0.00	0.00	0.00
Non MSA- Hendry County	8	40.00	85.96	75.00	75.00	12.50	12.50	36.36	57.14

* Based on 2015 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2016).

**** 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 5.00% of small loans to farms originated and purchased by the bank.

Institution ID: FLORIDA COMMUNITY BANK, N.A.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: FLORIDA									
Evaluation Period: OCTOBER 15, 2013 TO DECEMBER 31, 2016									
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
MD 22744- Broward County	2	5,647	51	2,201	53	7,848	15.30	0	0
MD 33124- Miami Dade County	2	4,400	45	3,186	47	7,587	14.79	0	0
MD 48424- Palm Beach County	2	1,263	38	3,491	40	4,754	9.27	0	0
MSA 34940 Collier County	2	764	43	5,468	45	6,232	4.59	0	0
Limited Review:									
MSA 15980- Lee County	2	918	22	592	24	1,510	2.94	0	0
MSA 19660- Volusia County (Partial)	0	0	5	487	5	487	0.95	0	0
MSA 35840 Sarasota County (Partial)	0	0	16	4,346	16	4,346	8.47	0	0
MSA 36740- Orange-Seminole	3	12,410	20	3,621	23	16,031	31.26	0	0
MSA 37340- Brevard County	1	576	2	16	3	592	1.15	0	0
MSA 38940- Martin-St Lucie Counties	0	0	18	775	18	775	1.51	0	0
MSA 39460- Charlotte County	1	240	18	41	19	281	0.55	0	0
MSA 42680- Indian River County	1	48	3	18	4	66	0.13	0	0
MSA 45300-Hernando-Hillsborough Counties (Partial)	0	0	9	193	9	193	0.38	0	0
Non MSA- Hendry County	0	0	8	476	8	476	0.93	0	0
Statewide with purpose, mandate, or function to serve AA	0	0	14	49	14	49	0.10		
Regional with purpose, mandate, or function to serve AA	0	0	20	61	20	61	0.12		

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

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

Institution ID: FLORIDA COMMUNITY BANK, N.A.

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: FLORIDA				Evaluation Period: JANUARY 1, 2014 TO DECEMBER 31, 2016			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population										
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography										
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp							
Full Review:																								
MD 22744- Broward County	8.21	6	12.77	0.00	16.66	16.67	66.67	6	6	0	0	0	0	4.13	28.90	35.76	31.21							
MD 33124- Miami Dade County	14.83	8	17.02	0.00	25.00	37.50	37.50	4	11	-1	0	-1	-5	5.06	26.89	34.46	33.01							
MD 48424- Palm Beach County	12.50	4	8.51	0.00	0.00	50.00	50.00	0	1	0	0	-1	0	4.88	26.01	33.30	35.59							
MSA 34940 Collier County	23.74	3	6.38	0.00	33.33	33.33	33.34	0	1	0	-1	0	0	9.05	20.27	43.40	27.27							
Limited Review:																								
MSA 15980- Lee County	7.13	4	8.51	0.00	25.00	75.00	0.00	0	1	0	0	-1	0	3.49	19.26	52.98	24.27							
MSA 19660- Volusia County (Partial)	3.87	2	4.26	0.00	0.00	100.0	0.00	0	2	0	-1	-1	0	3.15	19.18	53.02	24.65							
MSA 35840 Sarasota County (Partial)	7.52	2	6.38	0.00	50.00	50.00	0.00	0	1	0	-1	0	0	1.01	19.74	50.64	28.60							
MSA 36740- Orange-Seminole	6.74	4	8.51	0.00	50.00	25.00	25.00	0	1	0	0	0	-1	1.19	24.76	35.65	38.40							
MSA 37340- Brevard County	3.46	2	4.26	0.00	0.00	100.0	0.00	0	0	0	0	0	0	2.39	20.42	47.51	29.68							
MSA 38940- Martin-St Lucie Counties	4.83	3	6.38	0.00	66.67	33.33	0.00	0	0	0	0	0	0	2.29	19.63	55.65	22.43							
MSA 39460- Charlotte County	2.87	3	6.38	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	7.06	76.70	16.23							
MSA 42680- Indian River County	1.10	1	2.13	0.00	0.00	100.0	0.00	0	0	0	0	0	0	2.30	14.60	59.37	23.73							
MSA 45300-Hernando-Hillsborough Counties (Partial)	1.94	3	6.38	0.00	33.34	0.00	66.66	2	0	0	0	0	+2	5.36	24.97	38.23	31.06							
Non MSA- Hendry County	1.27	1	2.13	0.00	0.00	100.0	0.00	0	0	0	0	0	0	0.00	38.11	61.89	0.00							