



## **PUBLIC DISCLOSURE**

February 11, 2019

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

Seacoast National Bank  
Charter Number: 14838

815 Colorado Avenue  
Stuart, FL 34995

Office of the Comptroller of the Currency

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

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

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## Overall CRA Rating

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

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

Performance Levels	Seacoast National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory		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:

- The Lending Test rating is based on the excellent level of community development lending, the good geographic and borrower distribution of lending given performance context, and a substantial majority of the Bank’s loans in the assessment area(s) (AA).
- The Investment Test rating is based on the significant level of investments and good responsiveness to credit and community economic development needs.
- The Service Test rating is based on the reasonable accessibility of branch offices and the Bank being a leader in providing community development services.

## Lending in Assessment Area

A substantial majority of the Bank's loans are in its AA.

The Bank originated and purchased approximately 93 percent of its total loans inside the Bank's AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA level. The Bank's primary products based on loan originations and purchases are home mortgage and small loans to businesses. Farm loans are not a primary product but were included in the table below.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	7,269	96.1	292	3.9	7,561	1,627,556	91.4	152,397	8.6	1,779,953
Small Business	5,216	89.5	611	10.5	5,827	902,486	86.4	142,352	13.6	1,044,838
Small Farm	14	73.7	5	26.3	19	2,146	67.0	1,058	33.0	3,204
Total	12,499	93.2	908	6.8	13,407	2,532,188	89.5	295,807	10.5	2,827,995

Source: Evaluation Period: 10/01/2015 - 12/31/2018 Bank Data  
Due to rounding, totals may not equal 100.0

## Description of Institution

Seacoast National Bank (SNB) is a publicly traded intrastate community Bank headquartered in Stuart, Florida. SNB received its banking charter in February 1926 and is a wholly owned subsidiary of Seacoast Banking Corporation of Florida, a one-bank holding company also headquartered in Stuart. As of December 31, 2018, the holding company's consolidated assets totaled approximately \$6.8 billion.

As of December 31, 2018, SNB reported total assets of \$6.7 billion, total deposits of \$5.2 billion, and total equity capital of \$895.3 million. Net loans and leases totaled \$4.8 billion, which represents 70.9 percent of total assets. Outstanding loans by category include commercial real estate at 47.7 percent, 1-4 family residential at 33.1 percent, commercial and industrial at 15.1 percent, and consumer at 4.2 percent.

The Bank has nine AAs described later in this Performance Evaluation and one rating area, which is the State of Florida. Since the Bank's previous CRA Performance Evaluation dated November 30, 2015, SNB has grown from \$3.3 billion in total assets to \$6.7 billion in total assets. This growth has been through organic growth and from acquisitions from the following financial institutions or branches:

- October 19, 2018 - SNB acquired First Green Bancorp, Inc., which had total assets of \$730.9 million and seven branches in Broward, Lake, Orange and Volusia counties.
- November 3, 2017 - SNB acquired Palm Beach Community Bank, headquartered in West Palm Beach, Florida, which had total assets of \$332.9 million and four branches in Palm Beach County.

- October 20, 2017 - SNB acquired NorthStar Banking Corporation, headquartered in Tampa, Florida, which had total assets of \$211.3 million and three branches in Hillsborough and Pinellas counties.
- April 7, 2017 - SNB acquired GulfShore Bancshares, Inc., headquartered in Tampa, Florida, which had total assets of \$331.2 million and three branches in Hillsborough and Pinellas counties.
- June 4, 2016 - SNB acquired 14 branches from BMO Harris in Lake, Orange, and Seminole counties.
- March 11, 2016 - SNB acquired Floridian Financial Group, Inc., headquartered in Lake Mary, Florida, which had total assets of \$452.5 million and ten branches in Orange, Seminole, and Volusia counties.

SNB offers a full range of products and services through its branches in counties in Central and South Florida. The Bank had the following branch network during the evaluation period:

- six branches and six ATMs at separate locations in Martin County,
- five branches and three ATMs at separate locations in St. Lucie County,
- eight branches and two ATMs at separate locations in Orange County,
- four branches and one ATM at a separate location in Seminole County,
- three branches in Lake County,
- three branches in Brevard County,
- one branch and one ATM at a separate location in Broward County,
- six branches and four ATMs at separate locations in Palm Beach County,
- one branch in DeSoto County,
- four branches and one ATM at a separate location in Indian River County,
- one ATM in Highlands County,
- one ATM in Glades County,
- one branch and two ATMs in separate locations in Hendry County,
- one branch and two ATMs at separate locations in Okeechobee County,
- three branches and one ATM at a separate location in Hillsborough County,
- two branches in Pinellas County, and
- three branches and one ATM at a separate location in Volusia County.

In addition to the branches, SNB has four separate Commercial Banking Centers available to serve commercial banking clients located in Ft Lauderdale, Boca Raton, Palm Beach Gardens, and Lake Mary. Two additional Commercial Banking Centers are located in the Bank's branches in West Palm Beach and Winter Garden.

SNB provides a full range of banking and investment services to businesses and consumers, including personal and business deposit products, internet and mobile banking, personal, commercial and mortgage loans, wealth management services, and treasury management solutions.

The Bank has no affiliate or operating subsidiary activities considered when evaluating the Bank's CRA performance. There are no legal or financial factors impeding the Bank's ability to help meet the credit needs of its AAs. During the evaluation period, SNB faced competitive and economic challenges as discussed throughout this Performance Evaluation. These factors were considered when determining SNB's CRA performance. The Bank's rating at its previous CRA Performance Evaluation dated November 30, 2015 was "Outstanding."

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for loans is October 1, 2015 through December 31, 2018. The review period for community development (CD) loans, the Investment Test, and the Service Test is from December 1, 2015 through December 31, 2018.

This Performance Evaluation assesses the Bank's performance under the Lending, Investment, and Service Tests. In evaluating the Bank's lending performance, we reviewed residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA), small loans to businesses as reported under the CRA, and CD loans. The volume of farm loans was small and did not yield a meaningful analysis; however, we included them in the analysis of loans inside the AA and on the lending activity table. We also evaluated CD investments including donations as well as retail and community development services.

### Selection of Areas for Full-Scope Review

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

SNB has nine AAs in Florida comprised of Metropolitan Statistical Areas (MSAs) and one combined Non-MSA comprised of four separate rural counties. For our full-scope reviews we selected MSA 36740 (Orlando-Kissimmee-Sanford, FL) and MSA 38940 (Port St. Lucie, FL). MSA 36740 is comprised of Lake, Orange, Osceola, and Seminole counties, and MSA 38940 is comprised of St. Lucie and Martin counties. We selected the full-scope AAs after considering the number of originated and purchased loans in each AA, the volume of deposits in each AA, the number of branch offices in each AA, and the length of time branch offices have operated in the respective markets under the Bank's brand. The full-scope AAs represent 56.8 percent of the Bank's deposits as of June 30, 2018 and 54.3 percent of the total number of loans reported at this examination. In addition, 26 of the 51 banking offices are in these two full scope AAs. Refer to appendix A for additional information.

For this evaluation period, the limited-scope AAs were comprised of seven MSAs and one combined non-MSA. The limited-scope AAs include the following:

- MSA 19660 Deltona-Daytona Beach-Ormond Beach, FL - Flagler and Volusia counties
- MSA 22744 Miami-Ft Lauderdale-West Palm Beach, FL - Broward and Palm Beach counties
- MSA 37340 Palm Bay-Melbourne-Titusville, FL - Brevard County
- MSA 42680 Sebastian-Vero Beach, FL - Indian River County
- MSA 42700 Sebring, FL - Highlands County
- MSA 45300 Tampa-St. Petersburg-Clearwater, FL – Hernando, Hillsborough, Pasco, and Pinellas counties

- Non-MSA – Desoto, Glades, Hendry and Okeechobee counties

Combined, these limited-scope AAs originated approximately 45.7 percent of the reported loans and 43.1 percent of the total deposits. In addition, 25 of the 51 banking offices are in these limited-scope AAs. Refer to appendix A for additional information.

## **Ratings**

The Bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. SNB operates in one state and the state rating is based on performance in all the Bank's AAs with the most weight placed on the full-scope AAs. For the geographic and borrower distribution of loans under the Lending Test, business lending received the most weight considering the Bank has a business lending strategic focus. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

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

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

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

## State Rating

### State of Florida

**CRA rating for the State of Florida<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to meeting the credit needs of the Bank's assessment areas, given performance context.
- A good geographic distribution of loans, given performance context and considering the excellent level of lending inside the Bank's assessment area.
- A good distribution of loans by the income level of the borrower, given performance context.
- An excellent level of community development loans that are responsive to community credit needs given the Bank's capacity and the opportunities in its assessment area. The level of community development loans had a very positive impact on the overall Lending Test conclusion.
- A good level of flexible lending products that had a positive impact on the outcome of the Lending Test.
- A significant level of qualified investments including donations.
- Retail delivery systems reasonably accessible to low- and moderate-income (LMI) geographies.
- The Bank is a leader in providing CD services.

### Description of Institution's Operations in Florida

The Bank operates in nine AAs in the State of Florida as described in the Description of the Institution and the Scope of Evaluation sections of this Performance Evaluation. The Bank's primary business focus is business lending with residential lending as another primary product. The Bank's competitors include other local community banks in its markets and some of the largest banks that have a nationwide footprint as well as credit unions and nonbank financial entities that compete for residential and business loans.

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<sup>1</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.



Community credit needs in the full-scope AAs were determined by reviewing recent housing and demographic information, other CRA performance evaluations from other banks operating in the Bank’s AAs, and we conducted three community contacts with organizations that service the full-scope AAs, promote economic development, business financing, and financial education and literacy. The most critical needs identified from the contacts were associated with providing affordable housing, small business lending, and financial literacy.

The following tables depict the demographic information for the two full-scope AAs.

**MSA 36740 Orlando-Kissimmee-Sanford, Florida**

Table A – Demographic Information of the Assessment Area						
Assessment Area: 36740 Orlando-Kissimmee-Sanford						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	389	3.6	29.8	36.0	30.3	0.3
Population by Geography	2,277,816	2.5	28.2	36.9	32.4	0.0
Housing Units by Geography	964,253	2.7	28.0	38.6	30.7	0.0
Owner-Occupied Units by Geography	487,196	1.0	21.1	39.1	38.8	0.0
Occupied Rental Units by Geography	310,972	5.2	37.9	35.6	21.4	0.0
Vacant Units by Geography	166,085	2.9	29.7	43.1	24.3	0.0
Businesses by Geography	260,268	1.5	25.1	34.5	38.9	0.0
Farms by Geography	6,480	1.1	23.5	40.7	34.5	0.1
Family Distribution by Income Level	532,416	21.5	18.1	19.2	41.2	0.0
Household Distribution by Income Level	798,168	23.0	16.9	18.4	41.7	0.0
Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA		\$57,304	Median Housing Value			\$162,453
			Median Gross Rent			\$1,056
			Families Below Poverty Level			12.4%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

**MSA 38940 Port St Lucie-Ft Pierce, Florida**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: 38940 Port St Lucie-Ft Pierce</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	79	5.1	21.5	41.8	29.1	2.5
Population by Geography	439,592	3.6	19.7	51.8	25.0	0.0
Housing Units by Geography	215,909	3.4	17.0	49.6	30.0	0.0
Owner-Occupied Units by Geography	125,375	1.6	13.0	54.4	30.9	0.0
Occupied Rental Units by Geography	44,475	8.4	32.5	41.9	17.1	0.0
Vacant Units by Geography	46,059	3.4	12.7	44.0	39.9	0.0
Businesses by Geography	45,149	3.1	19.3	47.5	29.9	0.1
Farms by Geography	1,690	3.1	24.3	46.2	26.3	0.0
Family Distribution by Income Level	110,529	19.8	18.7	19.9	41.6	0.0
Household Distribution by Income Level	169,850	23.8	16.0	18.2	41.9	0.0
Median Family Income MSA - 38940 Port St. Lucie, FL MSA		\$56,570	Median Housing Value			\$159,862
			Median Gross Rent			\$1,004
			Families Below Poverty Level			11.3%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

**Scope of Evaluation in Florida**

As discussed earlier, MSA 36740 Orlando-Kissimmee-Sanford, FL and MSA 38940 Port St. Lucie-Ft. Pierce, FL were selected for full-scope reviews. Refer to the table in appendix A for a list of all AAs under review.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA****LENDING TEST**

The Bank's performance under the Lending Test in Florida is rated Outstanding.

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

Based on full-scope reviews, the Bank's performance in the MSA 36740-Orlando-Kissimmee-Sanford and MSA 38940 Port St. Lucie-Ft. Pierce, FL is excellent.

## Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
<b>Full Review</b>							
MSA 36740 Orlando-Kissimmee-Sanford FL	1,213	1,873	4	78	3,089	24.9	21.4
MSA 38940 Port St Lucie-Ft Pierce FL	2,494	1,015	0	16	3,503	29.4	35.4
<b>Limited Review</b>							
MSA 19660 Deltona-Daytona Beach-Ormond-Beach FL	602	311	0	10	912	7.3	4.0
MSA 33100 Miami-Ft Lauderdale-Pompano Beach FL	1,032	959	0	52	1,985	16.1	14.1
MSA 37340 Palm Bay-Melbourne-Titusville FL	756	411	0	5	1,116	9.2	4.5
MSA 42680 Sebastian-Vero Beach FL	522	221	0	4	740	5.9	6.2
MSA 42700 Sebring FL	12	6	1	0	19	0.1	0.0
MSA 45300 Tampa-St Petersburg-Clearwater FL	218	301	0	25	517	4.3	9.0
Non-MSAs FL	208	139	8	1	355	2.8	5.3

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
<b>Full Review</b>							
MSA 36740 Orlando- Kissimmee- Sanford FL	339,929	384,050	231	145,350	704,940	24.9	21.4
MSA 38940 Port St. Lucie- Ft Pierce, FL	463,211	106,789	0	27,335	568,800	29.4	35.4
<b>Limited Review</b>							
MSA 19660 Deltona- Daytona Beach- Ormond-Beach FL	160,540	62,307	0	19,886	222,767	7.3	4.0
MSA 33100 Miami-Ft Lauderdale- Pompano Beach FL	285,229	190,784	0	101,478	473,530	16.1	14.1
MSA 37340 Palm Bay- Melbourne- Titusville FL	209,202	80,559	0	9,002	289,681	9.2	4.5
MSA 42680 Sebastian-Vero Beach FL	88,133	21,394	0	2,330	109,001	5.9	6.2
MSA 42700 Sebring FL	1,216	543	50	0	1,809	0.2	0.0
MSA 45300 Tampa-St Petersburg- Clearwater FL	78,963	63,160	0	46,333	141,659	4.3	9.0
Non-MSAs FL	11,100	15,995	1,815	3,595	28,910	2.8	5.3

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

SNB has experienced rapid growth during the evaluation period due to several bank acquisitions. Those banks included Floridian Financial Group, BMO Harris – Orlando Operations, Gulfshore Bank, NorthStar Bank, Palm Beach Community Bank, and First Green Bank. Local competition is strong and consists of numerous national and state community banks, and branches of large, nationwide banks that offer a wide variety of home mortgage loan products and small business loans.

## MSA 36740 Orlando-Kissimmee-Sanford

SNB's lending activity in MSA 36740 is good, when considering the Bank's business strategy and loan competition. Home mortgage lending activity is adequate and small business lending activity is excellent.

Based upon FDIC Deposit Market Share data as of June 30, 2018, SNB achieved a 1.97 percent market share of deposits, ranking ninth among 45 financial institutions in the MSA. Based upon 2017 Peer Mortgage Data which is the most recent available information, SNB achieved a 0.59 percent lender market share of home loans, ranking 42<sup>nd</sup> among 753 reporting lenders. SNB's lender share of home mortgage loans was lower than its deposit market share and rank. This performance would normally be considered poor but is considered adequate given the Bank competes with some of the largest mortgage companies that have a nationwide presence and a wide selection of mortgage products. The top five mortgage lenders had 20.23 percent of the total lender market share. The top five lenders were Wells Fargo Bank National Association (NA), Quicken Loans, FBC Mortgage LLC, Freedom Mortgage Corporation, and JP Mortgage Chase Bank NA.

SNB achieved a 6.11 percent market share of small loans to businesses, ranking fourth among 162 reporting lenders. The Bank's small business lending activity exceeds its deposit market share and rank and is excellent. The top three lenders for small business lending consisted of American Express Federal Savings Bank (FSB), Bank of America, NA, and Wells Fargo Bank, NA.

## MSA 38940 Port St. Lucie

SNB's lending activity in the Port St. Lucie MSA is good, when considering the Bank's business strategy and loan competition. Home mortgage lending activity is adequate and small business activity is good considering competition in the MSA.

Based upon FDIC Deposit Market Share data as of June 30, 2018, SNB achieved an 18.45 percent market share of deposits, ranking first among 18 financial institutions in the MSA. Based upon 2017 Peer Mortgage Data, SNB had a lender market share of 4.21 percent for home loans, ranking third among 621 reporting lenders. The Bank's lender rank is near its deposit rank, and its lender market share is lower than its deposit market share. This performance is adequate considering the Bank competes with some of the largest mortgage companies that have a nationwide presence and a broad selection of mortgage products. The Bank also experienced challenges with limited residential home inventory and competition with private investors creating increased housing costs and cash payment for homes.

SNB achieved a 10.30 percent market share of small loans to businesses based on dollar volume which is more meaningful than the number of loans considering the credit card banks making smaller dollar business loans. The Bank ranks first among 115 reporting lenders. The Bank's performance equals the deposit market share rank and is somewhat lower than its lender market share. Performance for small business lending activity is good considering performance context.

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

The Bank exhibits a good geographic distribution of loans in its AA(s). Overall, the geographic distribution of home mortgage loans and small loans to businesses in the full-scope AAs is good.

MSA 36740 - Orlando-Kissimmee-Stanford

The geographic distribution of loans within MSA 36740 reflects good distribution throughout the AA.

### **Home Mortgage Loans**

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

The geographic distribution of home mortgage loans reflects good distribution throughout the AA.

For 2015-2016, the Bank's mortgage lending in low-income geographies was near to the owner-occupied housing units but exceeds the aggregate lending in low-income geographies. For moderate-income geographies, the Bank's lending was somewhat lower than the owner-occupied housing units and the aggregate lending in moderate-income geographies.

In 2017-2018, the Bank's mortgage lending in low-income geographies was lower than the owner-occupied housing units and lower than the aggregate lending in low-income geographies. For moderate-income geographies, the Bank's lending is lower than the owner-occupied housing units and somewhat lower the aggregate lending in moderate-income geographies.

### **Small Loans to Businesses**

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

The geographic distribution of small loans to businesses reflects excellent distribution throughout the AA.

For 2015-2016, the Bank's small business lending in low-income geographies exceeded the percent of businesses located in low-income geographies and exceeded the aggregate lending to small businesses in low-income geographies. For moderate-income geographies, the Bank's lending exceeded the percent of businesses located in moderate-income geographies and the aggregate lending to small businesses in low-income geographies.

For 2017-2018, the Bank's lending to small businesses in low-income geographies exceeded the percent of small businesses located in low-income geographies and also exceeded the aggregate lending in low-income geographies. For moderate-income geographies, the Bank's lending exceeded the percent of small businesses located in moderate-income geographies and also exceeded the aggregate lending to small businesses in moderate-income geographies.

MSA 36740 Port St Lucie-Ft Pierce

The geographic distribution of loans within MSA 38940 reflects good distribution throughout the AA.

### **Home Mortgage Loans**

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

The geographic distribution of home mortgage loans reflects adequate distribution throughout the AA.

For 2015-2016 the Bank's mortgage lending in low-income geographies was lower than the owner-occupied housing units, but exceeded the aggregate lending in low-income geographies. For moderate-income geographies, the Bank's lending was lower than the owner-occupied housing units, but exceeded aggregate lending in moderate-income geographies.

In 2017-2018, the Bank's mortgage lending in low-income geographies was lower than the owner-occupied housing units and lower than the aggregate lending in low-income geographies. For moderate-income geographies, the Bank's lending was somewhat lower than the owner-occupied housing units and somewhat lower than the aggregate lending in moderate-income geographies.

### **Small Loans to Businesses**

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

The geographic distribution of small loans to businesses reflects good distribution throughout the AA.

For 2015-2016, the Bank's small business lending in low-income geographies was somewhat lower than the percent of businesses located in low-income geographies, but near to the aggregate lending to small businesses in low-income geographies. For moderate-income geographies, the Bank's lending exceeded both the percent of businesses located in moderate-income geographies and the aggregate lending to small businesses in low-income geographies.

For 2017-2018, the Bank's lending to small businesses in low-income geographies equals the percent of small businesses located in low-income geographies and the aggregate lending in low-income geographies. For moderate-income geographies, the Bank's lending exceeded the percent of small businesses located in moderate-income geographies and the aggregate lending to small businesses in moderate-income geographies.

### **Lending Gap Analysis**

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

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

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

## MSA 36740 Orlando-Kissimmee-Stanford

The distribution of loans by income level of the borrower within MSA 36740 reflects adequate distribution among individuals of different income levels and businesses of different sizes, given the performance context.

### **Home Mortgage Loans**

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

The distribution of home mortgage loans reflects poor distribution among low-and moderate-income individuals in MSA 36740 but is considered adequate when considering performance context.

For 2015-2016 the Bank's mortgage lending to low-income borrowers was lower than the percent of families identified as low-income but was somewhat lower than the aggregate lending to low-income borrowers. For moderate-income individuals, the Bank's lending was lower than the percent of families identified as low-income and the aggregate lending to moderate-income individuals.

In 2017-2018, the Bank's mortgage lending to low-income individuals was significantly lower than the percent of families identified as low-income but was lower than the aggregate lending to low-income borrowers. For moderate-income individuals, the Bank's lending was lower than the percent of families identified as moderate-income and the aggregate lending to moderate-income individuals.

The Bank faces strong competition from larger, regional institutions in MSA 36740. While SNB entered the market through acquisitions during the evaluation period, the competing institutions have a more established presence in the market and have fostered relationships with community organizations that refer loans for LMI individuals. SNB has also faced challenges in attracting lenders with expertise in loan products geared to LMI individuals. Furthermore, LMI individuals are also challenged with the high costs of homes, insurance, and taxes requiring subsidized lending.

### **Small Loans to Businesses**

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

The borrower distribution of small loans to businesses is good in MSA 36740.

For 2015-2016, the Bank's loans to businesses with revenues less than or equal to \$1 million was somewhat lower than the percent of businesses identified as having revenues less than or equal to \$1 million, but exceeded the aggregate lending for these businesses.

For 2017-2018, the Bank's loans to businesses with revenues less than or equal to \$1 million was lower than the percent of businesses identified as having revenues less than or equal to \$1 million but only somewhat lower than the aggregate lending.

## MSA 38940 Port St Lucie-Ft Pierce



The distribution of loans by income level of the borrower within MSA 38940 reflects good distribution among individuals of different income levels and businesses of different sizes, given the performance context.

### **Home Mortgage Loans**

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

The distribution of home mortgage loans reflects adequate distribution among low-and moderate-income individuals in MSA 38940.

For 2015-2016 the Bank's mortgage lending to low-income borrowers was lower than the percent of families identified as low-income but exceeded the aggregate lending to low-income borrowers. For moderate-income individuals, the Bank's lending was somewhat lower than the percent of families identified as moderate-income but exceeded aggregate lending to moderate-income people.

In 2017-2018, the Bank's mortgage lending to low-income individuals was significantly lower than the percent of families identified as low-income and was somewhat lower than the aggregate lending to low-income borrowers. For moderate-income individuals, the Bank's lending was somewhat lower than the percent of families identified as moderate-income and somewhat lower than the aggregate lending to moderate-income people.

### **Small Loans to Businesses**

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

The borrower distribution of small loans to businesses is good in MSA 38940.

For 2015-2016, the Bank's loans to businesses with revenues less than or equal to \$1 million was somewhat lower than the percent of businesses identified as having revenues less than or equal to \$1 million but exceeded the aggregate lending for these businesses.

For 2017-2018, the Bank's loans to businesses with revenues less than or equal to \$1 million was near to both the percent of businesses identified as having revenues less than or equal to \$1 million and the aggregate lending for these businesses.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

MSA 36740 – Orlando-Kissimmee-Stanford

During the community development evaluation period, the Bank originated 78 CD loans totaling \$145.4 million in the MSA 36740 – Orlando-Kissimmee-Stanford AA. These loans included 52 loans totaling \$101.9 million for economic development, eight loans totaling \$23.5 million for affordable housing representing 329 housing units, nine loans totaling \$16.95 million to revitalize and stabilize LMI areas, and nine loans totaling \$3.04 million to community service organizations.

Noteworthy examples include:

- A \$6.8 million loan to purchase a 192-unit apartment complex in a moderate-income area that provides housing for LMI families at reduced rates.
- A \$4.96 million loan to purchase a 140-unit apartment complex in a moderate-income area that provides housing for LMI families at reduced rates.
- A \$1.2 million loan to refinance a commercial building housing a non-profit food pantry and outreach resource center that provides services to LMI individuals in the AA.

MSA 38940 Port St Lucie-Ft Pierce

During the community development evaluation period, the Bank originated 16 CD loans totaling \$27.3 million in MSA 38940 – Port St Lucie-Ft Pierce. These loans included three loans totaling \$17.8 million to revitalize and stabilize LMI areas, five loans totaling \$6.4 million for economic development, four loans totaling \$1.63 million to community service organizations, and four loans totaling \$1.46 million for affordable housing representing 89 housing units.

Noteworthy examples include:

- A \$3.5 million loan to finance the purchase of a warehouse property located in a moderate-income area. The property will serve as a warehouse for an entity that contracts with FEMA for disaster recovery efforts providing equipment during storm recovery efforts.
- A renewal of a \$13.3 million loan to finance the acquisition and development of a retail flex center in a moderate-income area of MSA 38940 – Port St Lucie-Ft Pierce. The flex center serves as an anchor to stabilize the area with tenants that provide jobs for LMI individuals in the area.
- A \$200,000 loan to a non-profit organization providing temporary supportive housing and services to poverty level homeless single women and their children. The loan was used for improvements to eight family dwelling units.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. The following are some of the flexible lending programs under which the Bank has originated loans.

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

The Bank offers FHA mortgage loans within its AAs. This program allows for flexible down payment source, flexible seller contribution and closing costs, expanded ratio, non-traditional credit history, and seller contribution. The Bank originated 290 loans totaling \$56 million.

### **Fannie Mae-HomeReady**

Fannie Mae HomeReady is designed for credit worthy LMI borrowers with expanded financing up to 97 percent loan-to-value (LTV) for home purchase and limited cash out refinance transactions with lower private mortgage insurance costs. HomeReady down payment sources permit down payment assistance program funds and community seconds. The program allows flexible sources of down payment and closing costs with no minimum contribution required from the borrower's own funds. The program expands to those buying in LMI geographies with no income limits. Properties not located in LMI geographies are subject to an income limit of 100 percent of area median income. Innovative and flexible underwriting permits reduced credit scores. The program requires homebuyer education and is not restricted to first time home buyers. Terms are fixed or adjustable up to 30 years. The Bank originated 45 loans under this program totaling 8.2 million.

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

The VA loan program features fixed payments for 30-year or 15-year terms guaranteed by the Department of Veteran Affairs. Loan amounts may be up to 100 percent LTV. All veterans must qualify. Loans are assumable but the borrowers must qualify. SNB originated 99 loans totaling \$28 million.

### **Habitat for Humanity**

The Bank has partnered with Habitat for Humanity. This organization provides low cost housing for low-income families. The partnership with Habitat Martin County yielded nine loans totaling \$736,000.

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

The program was created as part of the Jobs Act of 2010. The SSBCI is managed under the U.S. Treasury Department and helps states strengthen existing loans and equity programs or create new programs. This loan program has experienced lower activity as the economy has improved. SNB originated one loan totaling \$50,000.

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

SBA 504 loan offers longer terms with fixed rates, a preferred option for purchasing fixed assets; buildings and land, major machinery, and equipment or financing extensive property improvements. The SBA 504 loan provides financing up to 90 percent LTV with a 20-year fixed term. The SBA 504 is designed for existing for profit businesses with stable net worth and with after-tax profits of \$5 million or less. The 504 program works by distributing the loan among three parties. The business owner puts in a minimum of 10 percent, a conventional lender puts in 50 percent, and a Certified Development Company (CDC) puts in the remaining 40 percent. The maximum loan amount is \$ 5 million and \$5.5 million for manufacturing. SNB originated 251 loans totaling \$92 million.

### **SBA 7(a)**

The SBA 7a provides small to medium sized businesses access to non-traditional sources of capital. The SBA 7a loan offers up to 90 percent total project financing, minimal down payment, streamline application, and longer repayment terms without a balloon payment. SBA 7a is designed for small for-profit businesses with good credit and stable cash flow. Loan amounts are up to \$5 million. SBA provides a loan guarantee of 85 percent on loans of \$150,000 and 75 percent on loan amounts above \$150,000. SNB originated 55 loans totaling \$30 million.

### **SBA Express**

The SBA Express loan is available for amounts up to \$350,000 with a 36 hour approval turnaround time frame. Loan funds can be used to purchase real estate, refinance debt, or for working capital. Loan terms can be fixed, or a revolving line of credit. The Bank made 49 loans totaling \$9 million.

### **Conclusions for Areas Receiving a Limited-Scope Review**

Based on limited-scope reviews, the Bank's performance under the Lending Test in all of the limited-scope AAs, except for the 42680 Sebastian-Vero Beach MSA AA, is consistent with the Bank's overall "Outstanding" performance under the Lending Test in the full-scope areas. Although the Sebastian-Vero Beach MSA AA was weaker in comparison, its performance is good.

Refer to Tables O, P, Q, and R in the State of Florida section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

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

Based on full-scope reviews, the Bank's performance in the MSA 36740 Orlando-Kissimmee-Sanford and MSA 38940 Port St. Lucie-Ft Pierce AAs is good. The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. The institution exhibits good responsiveness to credit and community economic development needs. The institution does not use innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full Scope</b>										
MSA 36740- Orlando-Kissimmee-Sanford, FL	2	897	28	11,382	30	17.4	12,279	37.2	0	0
MSA 38940 Port St. Lucie-Ft. Pierce, FL	2	269	67	8,216	69	40.1	8,485	25.7	1	1,577
<b>Limited Scope</b>										
19660 Deltona-Daytona Beach-Ormond-Beach FL	0	0	4	605	4	2.3	605	1.8	0	0
MSA 33100 Ft Lauderdale-Pompano Beach, West Palm Beach FL	1	144	20	3,460	21	12.2	3,604	10.9	0	0
37340 Palm Bay-Melbourne-Titusville FL	1	34	4	1,115	5	2.9	1,149	3.5	0	0
42680 Sebastian-Vero Beach FL	1	26	10	444	11	6.4	470	1.4	0	0
42700 Sebring FL	0	0	0	0	0	0.0	0	0.0	0	0
45300 Tampa-St Petersburg-Clearwater FL	0	0	5	80	5	2.9	80	0.2	0	0
Seacoast Non-MSAs FL	2	153	4	41	6	3.5	194	0.6	0	0
Statewide With Purpose/Mandate/Function To Serve The AA	1	162	1	138	2	1.2	300	0.9	1	1,200
Regional With Purpose/Mandate/Function To Serve The AA	2	3,427	17	2,384	19	11.0	5,811	17.6	3	3,397

\* Prior Period Investments' means investments made in a previous evaluation 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.

The Bank's performance under the Investment Test is rated High Satisfactory. Based on full-scope reviews, the Bank's performance in MSA 36740 Orlando-Kissimmee-Sanford MSA is excellent, and the performance in the MSA 38940 Port St. Lucie- Ft Pierce MSA is good. Broader statewide or regional

investments and donations had a positive impact on the overall rating.

The Bank's community investments and donations are highly responsive to the needs of the AA as they address the needs for affordable housing to LMI individuals and economic development by providing financing to small businesses. Investments were not considered innovative or complex but demonstrated good responsiveness to the credit and community economic development needs of the AA. The investments supported community development services targeted to LMI individuals and small businesses in the Bank's AAs.

#### MSA 36740 Orlando-Kissimmee-Sanford

Performance in MSA 36740 is excellent when considering the impact of the investments. During the evaluation period, investments and donations totaled \$12.3 million, which consisted of two prior period mortgage backed securities pools totaling \$897,000 and 28 current period investments and donations totaling \$11.4 million.

The seven current period investments totaling \$11.3 million include one \$10 million affordable housing tax equity fund and five affordable housing investments totaling \$1 million to a capital management fund that consist of Ginnie Mae and Freddie Mac affordable housing mortgaged backed securities pools. There was also one \$273,000 economic development investment to a capital management organization where a SBA loan was granted to a small business.

Donations totaled \$69,000, with \$30,000 donated to an organization that provides shared facilities and easy access to business assistance organization for local entrepreneurs. All other donations were to organizations that provide community services to LMI individuals.

#### MSA 38940 Port St. Lucie-Ft. Pierce

Performance in MSA 38940 is good when considering the impact of the investments. During the evaluation period, investments and donations totaled \$8.5 million and had an unfunded commitment totaling \$1.6 million. Investments and donations consisted of two prior period affordable housing investments totaling \$269,000, 67 current period investments and donations totaling \$8.2 million, and one \$1.6 million unfunded commitment.

Twenty-eight current period investments totaling \$7.2 million consist of CRA investments funded through a capital management organization made up of Ginnie Mae, Fannie Mae and Freddie Mac affordable housing loan pools granted to LMI borrowers. There were also three mortgage backed securities pools totaling \$1.3 million that consist of loans to LMI borrowers that were located in LMI census tracts. The \$1.6 million unfunded commitment was to a capital management organization that provides affordable housing loan pools.

The 36 donations totaling \$123,000 went to 22 organizations whose primary purpose meets the definition of community development. Approximately \$116,000 of the donations were for community services targeted to LMI individuals, and \$7,000 was to an economic development council.

## **Broader Statewide or Regional Areas**

In addition, SNB had investments and donations totaling \$6.1 million and unfunded commitments totaling \$4.6 million. A majority of the current and prior period investments as well as the unfunded commitments were to two Small Business Investment Corporation equity funds that operate in the South East United States, including Florida where the Bank has its AAs. Donations were to CRA qualified organizations for the benefit of LMI individuals and small businesses. These activities had a positive impact on the investment test.

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

Based on limited-scope reviews, the Bank's performance under the Investment Test in MSA 33100 Miami-Ft Lauderdale-West Palm Beach and MSA 37340 Palm Bay-Melbourne-Titusville were consistent with the Bank's overall "High Satisfactory" performance under the Investment Test in the full-scope areas. The Bank's performance in MSA 19660 Deltona-Daytona Beach-Ormond Beach, MSA 42680 Sebastian-Vero Beach, MSA 45300 Tampa-St. Petersburg-Clearwater, and Non-MSAs were weaker than the Bank's overall performance under the Investment Test in the full-scope areas but were adequate. There were limited opportunities in the MSA 19660, MSA 42680, and the Non-MSAs, and the Bank was new to MSA 45300 through a bank purchase.

## **SERVICE TEST**

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

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

Based on full-scope reviews, the Bank's performance in MSA 36740 Orlando-Kissimmee-Sanford is good, and the performance in the MSA 38940 Port St. Lucie-Ft. Pierce MSA is excellent. The rating is based on the geographic distribution of full-service banking offices and ATMs, and the strong commitment to CD services.

## **Retail Banking Services**

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

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
	Low			Mod	Mid	Upp	Low	Mod	Mid	Upp	
<b>Full Review</b>											
MSA 36740 Orlando-Kissimmee-Sanford FL	21.4	15	29.41	0.00	26.67	20.00	53.33	2.49	28.19	36.92	32.40
MSA 38940 Port St. Lucie-Ft. Pierce, FL	35.4	11	21.57	9.10	36.36	36.36	18.18	3.61	19.67	51.77	24.95
<b>Limited Review</b>											
MSA 19660 Deltona-Daytona Beach-Ormond-Beach FL	4.0	5.88	0.00	33.33	66.67	0.00	5.88	1.92	16.58	61.23	20.27
MSA 33100 Miami-Ft Lauderdale-Pompano Beach FL	14.1	13.73	0.00	42.86	42.86	14.28	13.73	5.79	28.91	31.47	33.83
MSA 37340 Palm Bay-Melbourne-Titusville FL	4.5	5.88	0.00	66.67	0.00	33.33	5.88	3.45	23.47	43.21	29.87
MSA 42680 Sebastian-Vero Beach FL	6.2	7.84	25.00	0.00	50.00	25.00	7.84	2.66	19.26	53.41	24.67
MSA 42700 Sebring FL	0.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	9.02	75.55	15.43
MSA 45300 Tampa-St Petersburg-Clearwater FL	9.0	9.81	20.00	0.00	20.00	60.00	9.81	4.54	24.38	38.01	33.07
Non-MSAs FL	5.3	5.88	0.00	0.00	66.67	33.33	5.88	1.84	30.40	51.96	15.80

### MSA 36740 Orlando-Kissimmee-Sanford

The Bank's delivery systems are reasonably accessible to all portions of the MSA 36740. SNB has 15 full-service branches in the MSA. The Bank has no branches in low-income geographies, but has four branches located in moderate-income geographies. The percentage of the Bank's branch offices located in low-income geographies is significantly lower than the percentage of population within the low-



income geographies. However, the percentage of the Bank's branch offices located in moderate-income geographies is near the percentage of population within the moderate-income geographies. The Orlando-Kissimmee-Sanford MSA has 14 low-income census tracts out of 390 total census tracts, equating to 3.9 percent. In addition, the low-income population within this MSA represents only 2.5 percent of the total population.

#### MSA 38940 Port St. Lucie-Ft Pierce

The Bank's delivery systems are readily accessible to all portions of the MSA 38940. SNB has 11 full-service branches in the MSA. The Bank has one branch located in a low-income geography, and four branches located in moderate-income geographies. The percentage of the Bank's branch offices located in low-income and moderate-income geographies exceeds the percentage of population in both the low-income and moderate-income geographies. MSA 38940 has only four low-income census tracts, representing 4.9 percent of the MSA.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
<b>Full Review</b>						
MSA 36740 Orlando- Kissimmee- Sanford FL	19	16	0	-1	+2	+2
MSA 38940 Port St. Lucie-Ft. Pierce, FL	0	2	0	0	-1	-1
<b>Limited Review</b>						
MSA 19660 Deltona-Daytona Beach-Ormond- Beach FL	3	4	0	-1	+2	0
MSA 33100 Miami-Ft Lauderdale- Pompano Beach FL	4	3	0	0	0	+1
MSA 37340 Palm Bay-Melbourne- Titusville FL	0	0	0	0	0	0
MSA 42680 Sebastian-Vero Beach FL	0	1	0	0	-1	0
MSA 42700 Sebring FL	0	1	0	0	-1	0
MSA 45300 Tampa-St Petersburg- Clearwater FL	6	1	+1	0	+1	+3
Non-MSAs FL	0	3	0	0	-3	0

## MSA 36740 Orlando-Kissimmee-Sanford

To the extent changes have been made, the institutions opening and closing of branches has generally not adversely affected the accessibility of the Bank's delivery systems, particularly in LMI geographies and/or to LMI individuals. SNB opened and closed several branch locations in MSA 36740 during the evaluation period, but this was primarily a result of acquisitions. The net effect on the MSA was that one branch in a moderate-income tract was closed, while two branches were opened in both middle-income and upper-income geographies. The Bank's CRA Officer reviews any proposed LMI-tract closings to ensure that business rationale supports the necessity of the closure to achieve compelling institutional objectives and any impact on LMI customers is mitigated to the extent possible.

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the MSA, particularly LMI geographies and/or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, and telephone banking (including a 24/7 call center). These delivery methods provide increased access to banking services throughout all areas in MSA 36740. The Bank has a network of branded deposit-taking ATMs at all branch locations and select non-branch sites, as well as a partnership with Publix, whose Presto-brand ATMs are free of charge for SNB customers. While we did not place significant weight on these alternative delivery systems, the Bank provided metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals. The alternative delivery channels (based on actual transactions performed) is generally comparable across all groups.

## MSA 38940 Port St. Lucie-Ft Pierce

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of the Bank's delivery systems, particularly in LMI geographies and/or to LMI individuals. SNB closed two branches in the MSA 38940 during the evaluation period, one in a middle-income tract and one in an upper-income tract. The Bank did not open any branches during the review period. The Bank's CRA Officer reviews any proposed LMI-tract closings to ensure that business rationale supports the necessity of the closure to achieve compelling institutional objectives and any impact on LMI customers is mitigated to the extent possible.

Services, including where appropriate, business hours do not vary in a way that inconveniences portions of the MSA, particularly LMI geographies and/or individuals. Services offered and hours of operation are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, and telephone banking (including a 24/7 call center). These delivery methods provide increased access to banking services throughout all areas in MSA 38940. The Bank has a network of branded deposit-taking ATMs at all branch locations and select non-branch sites, as well as a partnership with Publix, whose Presto-brand ATMs are free of charge for SNB customers. While we did not place significant weight on these alternative delivery

systems, the Bank provided metrics to determine their effectiveness in helping to meet the service and credit needs of the LMI individuals. The alternative delivery channels (based on actual transactions performed) is generally comparable across all groups.

## **Community Development Services**

The institution is a leader in providing CD services.

SNB provides an excellent level of community development services and is a leader in providing community development services in their AAs that are responsive to the needs of the AAs. The Bank's responsiveness is demonstrated by the number of contributed hours, the number of employees actively involved, and the number and diversity of the types of organizations served.

### **MSA 36740 Orlando-Kissimmee-Sanford**

SNB provides an excellent level of CD services that are responsive to the needs of the community in the AA. Bank officers and employees devoted approximately 1,443 community service hours to 42 different qualifying organizations in the AA. More than 1,000 of these service hours were spent in leadership positions with various organizations throughout the AA. They shared their financial expertise by serving as board members, officers, and on committees, as well as, assisting with fundraising efforts. These activities help provide affordable housing, economic development, revitalization and stabilization of designated areas, and community services to LMI individuals and families. SNB officers and employees also participated in numerous financial literacy events as leaders, teachers, or facilitators. Examples of organizations for which the Bank frequently provides community development services include:

#### **Circles Orange County:**

This group helps lift low-income individuals out of poverty and into financial stability. SNB provides workshops and credit builder loans to support agency clients. Credit builder loans are used for debt reduction, rebuilding credit, to improve credit scores to qualify for home purchase, and to purchase reliable transportation for work. Bank officers and employees work as community partners with this organization.

**Boys and Girls Clubs of Lake and Sumter Counties:** This organization provides youth programs for disadvantaged young persons including after school and summer camp programs. Bank officers and employees serve on the board of directors and committees, and participate in fundraising campaigns.

**South Lake Chamber of Commerce:** This organization focuses on small business development and the revitalization and stabilization of the local community. Bank officers and employees served on the board of directors and participated in fundraisers for this organization.

### **MSA 38940 Port St. Lucie-Ft Pierce**

The level of CD Services provided in the Port St. Lucie MSA is excellent. During the evaluation period, officers and employees performed approximately 2,205 community development service hours to 68 different qualifying organizations in the AA. They shared their financial expertise by serving as board

members, officers, and on committees, as well as, assisting with fundraising efforts. These activities help provide affordable housing, economic development, revitalization and stabilization of designated areas, and community services to LMI individuals and families.

During the evaluation period, officers and employees spent 1,773 hours serving in leadership positions with various organizations in the AA. SNB officers and employees also participated in numerous financial literacy events as leaders, teachers, or facilitators. Examples of organizations for which the Bank frequently provides community development services include:

**Habitat for Humanity of Martin County:** This nonprofit organization’s program provides affordable housing and supports financial education and capacity building workshops for potential homeowners. Bank officers and employees serve on the board of directors and the family selection committee, as well as participating in fundraising campaigns.

**Stuart Main Street:** A nonprofit organization dedicated to improving the appearance and economic stability of downtown Stuart, Florida which is part of a CRA designated district. A Bank officer serves on the board of directors of this organization.

**Martin St. Lucie County Lending Consortium:** This loan consortium supports State housing Initiatives Partnership (SHIP), Neighborhood Stabilization Program (NSP), Florida First Time Homebuyer Opportunity Program (FHOP), and Home Investment Partnerships Program (HOME) down payment programs, and partners with local housing agencies, realtors, and area lenders. It also provides home buyer certification and home buyer education training workshops in partnership with local lenders and Guidewell Financial Credit Counseling Agency. The programs support down payment and special financing programs for LMI individuals. A Bank officer serves on the board of directors of this organization.

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

Based on limited-scope reviews, the Bank’s performance under the Service Test in the MSA19660 Deltona-Daytona Beach-Ormond Beach and MSA 33100 Miami-Ft Lauderdale-West Palm Beach AAs is consistent with the Bank’s overall “Satisfactory” performance under the Service Test in the full scope areas. The Bank’s performance under the Service Test in the MSA 37340 Palm Bay-Melbourne-Titusville, MSA 42680 Sebastian-Vero Beach, MSA 42700 Sebring, and MSA 45300 Tampa-St. Petersburg-Clearwater AAs is weaker than the Bank’s overall performance under the Service Test in the full scope areas but is adequate.

## Appendix A: Scope of Examination

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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 MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	October 1, 2015 through December 31, 2018	
<b>Bank Products Reviewed:</b>	Home mortgage loans (home purchase, home improvement, and refinance), small loans to businesses, community development loans, investments, and services.	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Florida</b>		
MSA 36740 Orlando-Kissimmee-Sanford, FL	Full-scope	Orange, Lake, Orange, Osceola, and Seminole Counties
MSA 38940 Port St. Lucie-Ft. Pierce, FL	Full-scope	St Lucie and Martin Counties
MSA 19660 Deltona-Daytona Beach-Ormond Beach, FL	Limited-scope	Volusia and Flagler Counties
MSA 33100 Miami-Ft Lauderdale-West Palm Beach, FL	Limited-scope	Broward and Palm Beach Counties
MSA 37340 Palm Bay-Melbourne-Titusville	Limited-scope	Brevard County
MSA 42680 Sebastian-Vero Beach, FL	Limited-scope	Indian River County
MSA 42700 Sebring	Limited-scope	Highlands County
MSA 45300 Tampa- St Petersburg-Clearwater	Limited-scope	Hillsborough, Hernando, Pasco, and Pinellas Counties
Non-MSA	Limited-scope	Desoto, Glades, Hendry, and Okeechobee Counties

## Appendix B: Summary of MMSA and State Ratings

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RATINGS				
Seacoast National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Seacoast National Bank	Outstanding	High Satisfactory	High Satisfactory	Outstanding
State:				
Florida	Outstanding	High Satisfactory	High Satisfactory	Outstanding

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always



equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “Bank” include activities of any affiliates that the Bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

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

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
<b>Full Review</b>																			
MSA 36740 Orlando-Kissimmee-Sanford FL	273	89,340	13.0	81,146	0.5	0.4	0.2	20.0	10.6	15.5	43.8	30.0	44.3	35.7	58.6	39.9	0.0	0.4	0.0
MSA 38940 Port St Lucie-Ft Pierce	964	174,260	46.0	16,858	1.0	0.3	0.2	14.7	7.7	7.4	57.5	52.5	64.0	26.8	39.5	28.4	0.0	0.0	0.0
<b>Limited Review</b>																			
19660 Deltona-Daytona Beach-Ormond-Beach FL	67	20,734	3.2	22,254	1.1	3.0	0.3	14.0	7.5	10.8	58.3	38.8	57.6	26.6	50.7	31.3	0.0	0.0	0.0
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL	244	97,700	11.6	145,423	2.1	0.4	1.2	23.1	7.4	16.8	36.3	30.3	36.9	38.6	61.9	45.0	0.0	0.0	0.1
MSA 37340 Palm Bay-Melbourne-Titusville FL	266	70,575	12.7	22,135	1.2	0.4	0.5	18.8	16.2	14.4	46.9	31.2	46.9	33.1	52.3	38.1	0.0	0.0	0.0
MSA 42680 Sebastian-Vero Beach FL	173	33,999	8.3	5,035	1.1	1.2	0.6	11.9	9.8	8.6	58.7	60.1	65.0	28.3	28.9	25.8	0.0	0.0	0.0
MSA 42700 Sebring FL	2	23	0.1	2,067	0.0	0.0	0.0	7.2	0.0	3.7	80.1	50.0	75.4	12.7	50.0	20.9	0.0	0.0	0.0
MSA 45300 Tampa-St Petersburg-Clearwater FL	10	2,611	0.5	102,154	1.8	0.0	1.3	22.2	30.0	15.3	43.8	30.0	42.9	32.2	40.0	40.5	0.0	0.0	0.0
Non-MSAs FL	98	3,987	4.7	1,504	0.0	0.0	0.0	30.2	24.5	31.3	61.6	66.3	60.0	8.2	9.2	8.6	0.0	0.0	0.0
<b>Total</b>	<b>2,097</b>	<b>493,229</b>	<b>100.0</b>	<b>398,576</b>	<b>1.5</b>	<b>0.5</b>	<b>0.9</b>	<b>21.1</b>	<b>10.2</b>	<b>15.2</b>	<b>42.9</b>	<b>45.0</b>	<b>43.4</b>	<b>34.4</b>	<b>44.3</b>	<b>40.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.1</b>

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-2018**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
<b>Full Review</b>																			
MSA 36740 Orlando-Kissimmee-Sanford FL	940	250,549	18.2	80,897	1.0	0.4	1.1	21.1	10.2	18.4	39.1	28.1	41.1	38.8	61.2	39.4	0.0	0.1	0.0
MSA 38940 Port St. Lucie-Ft. Pierce, FL	1,741	287,951	33.7	18,328	1.6	0.2	0.6	13.0	8.0	10.9	54.4	49.6	58.8	30.9	42.2	29.7	0.0	0.0	0.0
<b>Limited Review</b>																			
19660 Deltona-Daytona Beach-Ormond-Beach FL	535	130,806	10.3	22,980	0.8	0.4	0.3	12.6	9.0	10.2	62.4	42.1	63.4	24.2	48.6	26.1	0.0	0.0	0.0
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL	788	187,529	15.2	140,541	2.6	1.5	2.3	23.2	10.7	20.5	32.9	34.5	34.1	41.2	53.3	42.8	0.2	0.0	0.4
MSA 37340 Palm Bay-Melbourne-Titusville FL	490	138,627	9.5	22,752	1.6	0.2	0.7	21.1	12.9	20.8	43.5	32.9	44.7	33.8	54.1	33.8	0.0	0.0	0.0
MSA 42680 Sebastian-Vero Beach FL	349	54,134	6.7	5,233	1.4	1.4	0.9	13.4	13.8	12.0	54.1	55.3	60.2	31.1	29.5	26.8	0.0	0.0	0.0
MSA 42700 Sebring FL	10	1,193	0.2	2,445	0.0	0.0	0.0	4.5	0.0	2.5	76.6	70.0	74.4	18.9	30.0	23.1	0.0	0.0	0.0
MSA 45300 Tampa-St Petersburg-Clearwater FL	208	76,352	4.0	106,704	1.9	1.9	1.5	21.9	12.0	17.5	39.7	22.1	39.0	36.5	63.9	41.9	0.1	0.0	0.1
Non-MSAs FL	110	7,113	2.1	1,646	1.8	0.9	0.7	30.6	22.7	23.5	50.5	50.0	55.5	17.0	26.4	20.3	0.0	0.0	0.0
<b>Total</b>	<b>5,171</b>	<b>1,134,253</b>	<b>100.0</b>	<b>401,526</b>	<b>1.9</b>	<b>0.6</b>	<b>1.5</b>	<b>21.1</b>	<b>10.2</b>	<b>18.1</b>	<b>39.5</b>	<b>40.4</b>	<b>40.9</b>	<b>37.3</b>	<b>48.8</b>	<b>39.4</b>	<b>0.1</b>	<b>0.0</b>	<b>0.2</b>

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2015-2016</b>		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers					
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate			
<b>Full Review</b>																						
MSA 36740 Orlando-Kissimmee-Sanford FL	273	89,340	13.0	81,146	20.1	2.2	3.4	18.6	4.8	13.4	20.8	9.5	19.7	40.5	78.0	46.1	0.0	5.5	17.4			
MSA 38940 Port St. Lucie-Ft. Pierce, FL	964	174,260	53.6	16,858	18.6	4.0	3.5	20.1	14.4	13.8	20.3	18.9	20.9	41.0	61.7	44.0	0.0	0.9	17.8			
<b>Limited Review</b>																						
19660 Deltona-Daytona Beach-Ormond-Beach FL	67	20,734	3.7	22,254	19.7	1.5	3.9	18.2	11.9	14.7	22.0	13.4	21.0	40.1	70.1	42.5	0.0	3.0	17.9			
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL	244	97,700	13.6	145,423	22.4	0.8	2.2	17.3	8.2	9.6	18.9	14.3	17.6	41.3	73.4	53.7	0.0	3.3	16.8			
MSA 37340 Palm Bay-Melbourne-Titusville FL	266	70,575	12.7	22,135	19.4	4.5	5.1	18.8	10.2	14.6	21.5	15.0	19.1	40.4	70.3	43.1	0.0	0.0	18.1			
MSA 42680 Sebastian-Vero Beach FL	173	33,999	8.3	5,035	20.3	6.4	3.3	17.0	11.6	12.8	22.0	18.5	18.4	40.7	63.6	50.3	0.0	0.0	15.3			
MSA 42700 Sebring FL	2	23	0.1	2,067	15.6	0.0	4.0	21.3	0.0	12.3	24.0	0.0	18.6	39.1	100.0	42.9	0.0	0.0	22.2			
MSA 45300 Tampa-St Petersburg-Clearwater FL	10	2,611	3.4	102,154	20.7	0.0	4.1	18.5	10.0	14.2	19.7	20.0	19.7	41.0	70.0	43.5	0.0	0.0	18.5			
Non-MSAs FL	98	3,987	5.4	1,504	23.6	9.2	3.7	20.8	20.4	13.6	19.9	20.4	22.9	35.8	50.0	41.0	0.0	0.0	18.8			
<b>Total</b>	<b>2,097</b>	<b>493,229</b>	<b>100.0</b>	<b>398,576</b>	<b>21.1</b>	<b>3.8</b>	<b>3.3</b>	<b>18.1</b>	<b>11.8</b>	<b>12.4</b>	<b>19.8</b>	<b>16.5</b>	<b>19.0</b>	<b>40.9</b>	<b>66.2</b>	<b>47.8</b>	<b>0.0</b>	<b>1.6</b>	<b>17.6</b>			

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-2018
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
<b>Full Review</b>																			
MSA 36740 Orlando-Kissimmee-Sanford FL	940	250,549	18.2	80,897	21.5	1.0	3.4	18.1	5.7	12.4	19.2	13.7	21.6	41.2	77.9	45.4	0.0	1.7	17.1
MSA 38940 Port St. Lucie-Ft. Pierce, FL	1,741	287,951	33.7	18,328	19.8	2.6	3.4	18.7	10.3	14.3	19.9	19.1	21.7	41.6	65.5	42.4	0.0	2.4	18.3
<b>Limited Review</b>																			
19660 Deltona-Daytona Beach-Ormond-Beach	30	15,130	11.0	52,871	23.7	3.3	3.4	18.3	13.3	12.3	19.1	10.0	21.3	38.9	50.0	44.8	0.0	23.3	18.1
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL	535	130,806	10.3	22,980	19.1	1.5	4.7	19.1	6.5	15.4	21.0	10.5	22.1	40.8	80.6	40.9	0.0	0.9	16.9
MSA 37340 Palm Bay-Melbourne-Titusville FL	789	187,604	15.3	140,541	23.1	1.0	2.6	17.0	5.7	10.6	17.7	16.5	18.9	42.2	75.3	50.9	0.0	1.5	17.0
MSA 42680 Sebastian-Vero Beach FL	349	54,134	15.9	5,233	20.6	4.0	5.5	18.6	14.3	17.0	18.6	18.1	20.9	42.2	63.3	42.1	0.0	0.3	14.5
MSA 42700 Sebring FL	10	1,193	0.5	2,445	16.6	10.0	4.0	20.3	0.0	11.0	21.6	20.0	19.3	41.4	70.0	44.1	0.0	0.0	21.6
MSA 45300 Tampa-St Petersburg-Clearwater FL	208	76,352	4.0	106,704	21.6	3.4	4.1	17.9	6.3	14.3	19.1	14.9	20.7	41.4	72.1	42.8	0.0	3.4	18.1
Non-MSAs FL	110	7,113	5.0	1,646	26.0	3.6	3.7	18.2	10.9	15.2	20.6	25.5	22.5	35.1	59.1	39.4	0.0	0.9	19.2
<b>Total</b>	<b>5,172</b>	<b>1,134,327</b>	<b>100.0</b>	<b>401,526</b>	<b>22.0</b>	<b>2.1</b>	<b>3.5</b>	<b>17.7</b>	<b>8.2</b>	<b>12.8</b>	<b>18.7</b>	<b>16.4</b>	<b>20.4</b>	<b>41.6</b>	<b>71.6</b>	<b>45.8</b>	<b>0.0</b>	<b>1.7</b>	<b>17.4</b>
Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0																			



Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2015-2016		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
<b>Full Review</b>																					
MSA 36740 Orlando-Kissimmee-Sanford FL	728	136,719	36.7	62,740	0.6	1.6	0.6	23.4	26.8	21.0	38.5	37.9	36.7	37.4	33.7	41.7	0.0	0.0	0.0		
MSA 38940 Port St. Lucie-Ft. Pierce, FL	439	37,255	22.1	11,518	1.8	1.1	1.5	18.7	24.8	19.3	52.5	44.9	48.0	26.9	28.7	31.0	0.1	0.5	0.2		
<b>Limited Review</b>																					
19660 Deltona-Daytona Beach-Ormond-Beach FL	101	19,072	6.1	12,984	2.8	8.9	3.1	18.9	28.7	18.6	50.5	26.7	47.3	27.8	35.6	30.9	0.0	0.0	0.0		
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL L	380	63,388	23.0	242,848	3.4	5.8	3.2	21.8	21.8	20.5	30.3	36.3	28.5	43.7	35.3	46.8	0.8	0.8	0.9		
MSA 37340 Palm Bay-Melbourne-Titusville FL	177	33,190	8.9	11,299	1.8	6.2	1.7	22.2	42.9	23.3	42.0	28.8	39.9	33.9	22.0	35.0	0.0	0.0	0.0		
MSA 42680 Sebastian-Vero Beach FL	95	6,436	4.8	4,033	5.0	10.5	7.2	8.8	4.2	8.8	55.8	69.5	53.8	30.2	15.8	29.6	0.2	0.0	0.6		
MSA 42700 Sebring FL	3	218	0.9	1,475	0.0	0.0	0.0	8.3	33.3	10.0	74.1	33.3	72.8	17.2	33.3	16.5	0.4	0.0	0.7		
MSA 45300 Tampa-St Petersburg-Clearwater FL	12	3,076	0.7	74,386	2.8	0.0	3.3	21.3	33.3	20.7	38.8	58.3	38.4	37.0	8.3	37.6	0.1	0.0	0.1		
Non-MSAs FL	48	4,399	2.4	1,807	0.0	0.0	0.0	29.1	20.8	33.0	61.3	60.4	59.4	9.6	18.8	7.5	0.0	0.0	0.0		
<b>Total</b>	<b>1,983</b>	<b>303,803</b>	<b>100.0</b>	<b>423,090</b>	<b>2.7</b>	<b>3.5</b>	<b>2.8</b>	<b>21.5</b>	<b>25.8</b>	<b>20.5</b>	<b>36.0</b>	<b>39.9</b>	<b>33.4</b>	<b>39.3</b>	<b>30.6</b>	<b>42.8</b>	<b>0.5</b>	<b>0.3</b>	<b>0.5</b>		

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2017-2018</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
<b>Full Scope</b>																				
MSA 36740 Orlando-Kissimmee-Sanford FL	1,153	230,782	35.4	58,538	1.5	1.9	1.3	25.1	26.8	24.6	34.4	36.9	34.0	39.0	34.3	40.0	0.0	0.0	0.0	
MSA 38940 Port St. Lucie-Ft. Pierce, FL	576	69,534	17.7	11,329	3.1	3.1	2.9	18.2	28.9	21.1	47.4	34.9	44.3	30.1	32.5	31.4	0.1	0.4	0.3	
<b>Limited Review</b>																				
19660 Deltona-Daytona Beach-Ormond-Beach FL	210	43,235	6.4	13,427	2.2	5.7	2.4	18.7	33.8	20.0	55.5	41.	53.4	23.6	19.5	24.3	0.0	0.0	0.0	
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL	579	127,396	17.8	226,331	4.2	11.1	4.6	21.9	22.5	21.4	28.2	30.7	27.3	44.5	34.9	45.5	1.2	0.9	1.2	
MSA 37340 Palm Bay-Melbourne-Titusville FL	234	47,369	7.2	11,838	2.4	3.8	2.2	23.5	37.6	23.6	39.0	29.9	38.3	35.0	28.6	35.9	0.1	0.0	0.0	
MSA 42680 Sebastian-Vero Beach FL	126	14,958	7.9	4,263	5.2	10.3	9.1	13.4	17.5	13.2	48.4	55.6	45.6	32.9	15.9	31.4	0.2	0.8	0.7	
MSA 42700 Sebring FL	3	275	0.2	1,442	0.0	0.0	0.0	7.4	0.0	8.5	73.7	66.7	75.6	18.5	33.3	14.9	0.4	0.0	1.0	
MSA 45300 Tampa-St Petersburg-Clearwater FL	289	60,084	18.0	74,337	4.0	6.6	4.6	20.7	21.5	20.6	35.2	33.8	34.9	39.8	38.1	39.7	0.3	0.3	0.3	
Non-MSAs FL	91	11,596	2.8	1,724	2.2	0.0	2.6	25.5	37.4	29.8	46.6	36.3	46.6	25.7	26.4	21.0	0.0	0.0	0.0	
<b>Total</b>	<b>3,261</b>	<b>605,239</b>	<b>100.0</b>	<b>403,229</b>	<b>3.5</b>	<b>4.8</b>	<b>3.9</b>	<b>21.8</b>	<b>27.0</b>	<b>21.6</b>	<b>33.3</b>	<b>35.7</b>	<b>31.8</b>	<b>40.7</b>	<b>32.2</b>	<b>41.9</b>	<b>0.7</b>	<b>0.3</b>	<b>0.8</b>	

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
<b>Full Review</b>											
MSA 36740 Orlando-Kissimmee-Sanford FL	728	136,719	36.7	62,740	89.3	47.5	47.4	3.6	43.8	7.1	8.7
MSA 38940 Port St. Lucie-Ft. Pierce, FL	439	37,255	22.1	11,518	90.4	55.6	47.9	3.1	31.0	6.4	13.4
<b>Limited Review</b>											
19660 Deltona-Daytona Beach-Ormond-Beach FL	29	6,149	3.5	41,405	85.0	1.6	47.7	3.3	1.9	11.7	0.0
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL	380	63,388	19.2	242,848	90.7	48.9	48.5	3.8	47.1	5.5	3.9
MSA 37340 Palm Bay-Melbourne-Titusville FL	177	33,190	8.9	11,299	88.8	52.5	48.9	3.8	40.1	7.5	7.3
MSA 42680 Sebastian-Vero Beach FL	95	6,436	4.8	4,033	91.1	69.5	46.4	3.2	20.0	5.7	13.2
MSA 42700 Sebring FL	3	268	0.2	1,475	93.7	66.7	55.9	1.8	50.0	4.5	0.0
MSA 45300 Tampa-St Petersburg-Clearwater FL	12	3,076	0.7	74,386	89.3	33.3	48.6	3.8	58.3	6.9	8.3
Non-MSAs FL	48	4,399	2.4	1,807	86.9	62.5	45.9	3.2	27.1	9.9	10.4
<b>Total</b>	<b>1,983</b>	<b>303,803</b>	<b>100.0</b>	<b>423,090</b>	<b>90.1</b>	<b>51.3</b>	<b>48.5</b>	<b>3.7</b>	<b>39.6</b>	<b>6.1</b>	<b>9.1</b>

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2017-2018**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
<b>Full Review</b>											
MSA 36740 Orlando-Kissimmee-Sanford FL	1,153	230,792	35.4	58,538	89.7	39.3	52.2	3.5	49.0	6.7	11.7
MSA 38940 Port St. Lucie-Ft. Pierce, FL	576	69,534	17.7	11,329	90.4	48.6	51.3	3.2	39.8	6.4	11.6
<b>Limited Review</b>											
19660 Deltona-Daytona Beach-Ormond-Beach FL	210	43,235	6.4	13,427	90.3	40.0	53.9	3.2	45.7	6.5	14.3
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL	579	127,396	17.8	226,331	90.6	39.6	52.9	4.0	48.7	5.3	11.7
MSA 37340 Palm Bay-Melbourne-Titusville FL	234	47,369	7.2	11,838	88.6	44.4	51.7	3.9	48.7	7.6	6.8
MSA 42680 Sebastian-Vero Beach FL	126	14,958	3.9	4,263	90.4	48.4	48.3	3.6	35.5	6.0	15.1
MSA 42700 Sebring FL	3	275	0.2	1,442	92.3	0.0	56.9	2.4	0.0	5.4	100.0
MSA 45300 Tampa-St Petersburg-Clearwater FL	289	60,084	8.9	74,337	89.3	45.7	52.2	3.9	44.3	6.8	10.0
Non-MSAs FL	91	11,596	2.8	1,724	86.5	45.1	46.8	3.5	31.9	10.0	23.1
<b>Total</b>	<b>3,261</b>	<b>605,239</b>	<b>100.0</b>	<b>403,229</b>	<b>90.1</b>	<b>42.4</b>	<b>52.5</b>	<b>3.9</b>	<b>45.7</b>	<b>6.0</b>	<b>11.9</b>

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