

PUBLIC DISCLOSURE

March 16, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Commercial Bank of Florida

**45 South Orange Avenue
Orlando, Florida**

RSSD ID Number: 2737029

FEDERAL RESERVE BANK OF ATLANTA

**1000 Peachtree Street, N.E.
Atlanta, Georgia 30309-4470**

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

TABLE OF CONTENTS

Institution Rating	1
Institution	1
Scope of Examination	1
Description of Institution	2
Conclusions with Respect to Performance Tests	3
Metropolitan Area (Reviewed Using Full-Scope Review) – Orlando, Florida	5
Description of Institution’s Operations	5
Conclusions with Respect to Performance Tests	8
Geographic Distribution of Loans	8
Lending to Businesses of Different Sizes	8
Community Development Test	9
Metropolitan Area (Reviewed Without Using Full-Scope Procedures) – Deltona, Florida	10
Description of Institution’s Operations	10
Conclusions with Respect to Performance Tests	10
Appendix A – Scope of the Examination	11
Appendix B – Demographic and Lending Tables – Limited Review Area	12
Appendix C – Glossary	14
Appendix D – Definitions and Abbreviations	17
Appendix E – General Information	18

TABLES

	PAGE
Ratings	1
Composition of the Loan Portfolio	2
Lending Inside and Outside the Assessment Area	3
Unemployment Rates	6
Assessment Area Demographics	7
Loan Distribution	8
Community Development Services	9

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

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The following table indicates the performance level of First Commercial Bank of Florida with respect to the lending and community development tests.

PERFORMANCE LEVELS	PERFORMANCE TESTS	
	Lending Test	Community Development Test
Outstanding		
Satisfactory	X	X
Needs to Improve		
Substantial Noncompliance		

The following major factors support the overall CRA rating:

- The bank's average loan-to-deposit ratio was more than reasonable.
- A substantial majority of loans were made in the assessment area.
- The geographic distribution of loans reflects reasonable dispersion.
- The distribution of borrowers reflects reasonable penetration among businesses of different sizes.
- The level of community development loans and services reflects adequate responsiveness to community development needs, given the bank's capacity and the availability of such opportunities in the assessment area.

INSTITUTION

SCOPE OF EXAMINATION

First Commercial Bank of Florida's CRA performance evaluation was based on CRA activities in its assessment areas using the Intermediate Small Institution Examination Procedures. Currently, intermediate small banks are banks with assets of at least \$277 million as of December 31 of both of the prior two calendar years and less than \$1.109 billion as of December 31 of either of the prior two calendar years. These thresholds are adjusted annually and published by the Board of Governors of the Federal Reserve System. Under these procedures, effective as of September 1, 2005, institutions meeting the threshold size are evaluated under two separately rated tests: a lending test; and a community development test that includes an evaluation of community development loans, investments, and services in light of community needs and the capacity of the bank.

The evaluation included an analysis of commercial loans originated from January 1, 2007 through December 31, 2008. For this analysis, commercial and industrial and nonresidential real estate loans were combined for the review. A substantial majority of the bank's loans and deposits are in the Orlando, Florida assessment area. Consequently, this assessment area was selected for a full-scope review.

For the community development test, the examination covered community development loans, qualified investments, and community development services from March 8, 2005 through December 31, 2008. A

community development financing activity defined under the CRA must have one of the following as its primary purpose:

- providing affordable housing or community services for low-or moderate- income persons
- promoting economic development through the financing of small business and farms
- revitalizing or stabilizing low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies that benefit the assessment area or a larger statewide or regional area that includes the assessment area.

DESCRIPTION OF INSTITUTION

First Commercial Bank of Florida is a community bank that is wholly owned by FCB Florida Bancorporation. Both the bank and holding company are headquartered in Orlando, Florida. The bank operates nine offices; the main office in Orlando, and branches in Kissimmee, Winter Garden, Lake Mary, Winter Park, St. Cloud, Edgewood, Orlando, and Deltona. All of the branch offices have ATMs. The bank opened three branch offices and did not close any branches since the previous CRA evaluation,

According to the Consolidated Reports of Condition and Income, total assets increased 29.2 percent from \$544.5 million to \$703.6 million between December 31, 2005 and December 31, 2008, Total loans outstanding increased 31.8 percent from \$453.5 million to \$597.6 million and total deposits increased 36 percent from \$439.6 million to \$598.1 million during the same period.,

First Commercial Bank of Florida is a full service community bank that primarily offers commercial real estate and construction and development loans, business deposit services, and a variety of residential mortgage and consumer loan products. The bank recently began to offer instant deposit and remote capture to service its business customers. The bank’s business strategy is to develop a franchise in the greater Orlando area by targeting small to medium sized businesses and expanding its branch network.

The composition of the loan portfolio according to the September 30, 2008 Consolidated Reports of Condition and Income is displayed in the following table:

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	9/30/2008		12/31/2007		12/31/2006	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	218,953	36.3%	311,413	50.6%	278,664	49.1%
Secured by One- to Four- Family Dwellings	52,724	8.7%	33,370	5.4%	28,554	5.0%
Other Real Estate:						
Farmland	8,413	1.4%	179	0.0%	193	0.0%
Multifamily	6,465	1.1%	6,067	1.0%	4,215	0.7%
Nonfarm nonresidential	287,420	47.6%	228,132	37.1%	221,201	38.9%
Commercial and Industrial	23,930	4.0%	30,736	5.0%	30,753	5.4%
Loans to Individuals	5,408	0.9%	5,684	0.9%	4,438	0.8%
Agricultural Loans	0	0.0%	0	0.0%	0	0.0%
Total	\$603,313	100.00%	\$615,581	100.00%	\$568,018	100.00%

* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.

As indicated by the table, the bank’s loan portfolio consists primarily of nonfarm nonresidential loans and construction and development loans. This is consistent with the bank’s strategy, which, until recently, focused on commercial real estate lending. The bank makes a limited number of consumer loans.

First Commercial Bank of Florida complies with the requirements of the CRA. No known legal impediments exist that would restrain the bank from meeting the credit needs of its assessment area. The bank received a “Satisfactory” rating at its previous evaluation conducted by this Federal Reserve Bank on March 7, 2005. The small bank CRA examination procedures were used at that examination.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Loan-to-Deposit Ratio Analysis

First Commercial Bank of Florida’s average loan to deposit (LTD) ratio for the eight quarter period ending December 31, 2008 was 98.3 percent and is considered more than reasonable given the institution’s size, financial condition, and assessment area credit needs. The bank’s LTD ratios ranged from a high of 103.8 percent as of December 31, 2007 to a low of 92.7 percent as of September 30, 2008. The bank’s average LTD ratio was compared with the average LTD ratios of three other financial institutions of similar asset size with branch offices in the assessment area. The LTD ratios for these banks ranged from 81.1 percent to 97.2 percent.

Assessment Area Concentration

An analysis of the bank’s record of lending inside its assessment areas was conducted. A substantial majority of the bank’s lending occurred inside its assessment area. The analysis consisted of a review of 118 commercial loans originated in the assessment areas by the bank between January 1, 2007 and December 31, 2008.

The following table shows the levels of lending inside and outside the bank’s assessment areas, by number of loans and dollar amount:

Lending Inside and Outside the Assessment Area

Loan Type	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Commercial	118	94.4	\$74,974	88.7	7	5.6	\$9,513	11.3
TOTAL LOANS	118	94.4	\$74,974	88.7	7	5.6	\$9,513	11.3

Note: Affiliate loans not included

The table shows that 94.4 percent by number and 88.7 percent by dollar amount of the bank’s commercial loans were extended to businesses inside the bank’s assessment areas. This level of lending indicates the bank is serving the credit needs of businesses within its assessment areas.

Geographic Distribution of Loans

The bank’s geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. This conclusion was based upon the bank’s lending performance in its assessment areas compared to available demographic data. Please refer to the separate assessment area analyses for more information on the geographic distribution of lending.

Lending to Businesses of Different Sizes

The distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes. For this analysis, the distribution of commercial lending across business revenue sizes was compared with available demographic information. Please refer to the separate assessment area analyses for more information on the distribution of lending to businesses of different sizes.

Responsiveness to Complaints

The bank has not received any CRA-related complaints since the previous examination.

Community Development Test

According to the community development test, an institution should appropriately assess the needs in its community; engage in different types of community development activities based on those needs and the institution's capacity, and take reasonable steps to apply its community development resources strategically to meet those needs. Areas examined include community development lending, qualified investments, and community development services. A community development loan is defined as a loan that has community development as its primary purpose that has not been reported or collected by the bank or an affiliate for consideration as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan.

First Commercial Bank of Florida's community development performance demonstrates adequate responsiveness to the community development needs of its assessment area, considering the bank's capacity and the needs and availability of such opportunities in the assessment area.

During the review period, the bank originated three community development loans totaling \$10,560,000 to finance 288 housing units. Two of the properties are located in Orlando, Florida, and the third property is located in Kissimmee, Florida. A detailed description of community development loans is discussed later in this report.

The bank has not made any CRA-qualified investments since the previous examination. Donations totaling \$5,600 were made that supported community services targeted to low-and moderate-income individuals and families, or promoted economic development. Bank employees have used their financial expertise to provide financial and technical assistance to organizations that promote economic development and provide assistance to small businesses. The community development services show adequate responsiveness to the community development needs of the assessment area. A description of these services appears later in this report.

The bank has nine offices, eight located in the Orlando assessment area and one located in the Deltona assessment area. None of the bank's offices are located in low-or moderate-income census tracts. However, several branch offices are in tracts that border on or are near low- and moderate-income tracts. The main office in Orlando, Florida is located in an upper-income tract, but is adjacent to a low-income tract. The Pine Castle branch office in Edgewood, Florida is located in an upper-income tract, but is less than a mile away from a moderate-income tract. The West Orange branch office in Winter Garden, Florida is located in a middle-income tract, but is approximately one mile from a moderate-income tract. The Winter Park branch office in Winter Park, Florida is located in an upper-income tract and is adjacent to a moderate-income tract. Finally, the Kissimmee branch office in Kissimmee, Florida, which is located in a middle-income tract, is adjacent to moderate-income tracts.

Alternative systems for delivering retail banking services to the bank's assessment area include instant deposit and remote capture for its business customers. Also, the bank's branches have extended banking hours and the bank provides Internet banking.

Compliance with Antidiscrimination Laws

First Commercial Bank of Florida is in compliance with the substantive provisions of the antidiscrimination laws and regulations. The bank accepts applications from all segments of its communities, including low- and moderate-income areas. No evidence of discrimination or the use of illegal credit practices was noted during the review of bank policies and procedures.

Community Contacts

As part of the CRA evaluation, information was obtained from two contacts regarding the opportunities for businesses and economic development in the Orlando Assessment Area. One of the contacts stated that, because of the current economic conditions, it is more challenging to become an entrepreneur, and small businesses are finding it very difficult to get funding, either from financial institutions or venture capitalists. Another contact commented on small business activity in Seminole County. The contacted stated that banks have raised their capital requirements and are less willing to take risks with small businesses, especially start-up businesses. Both contacts stated that opportunities are available for financial institutions to participate in programs to assist small businesses.

METROPOLITAN AREA (REVIEWED USING FULL-SCOPE REVIEW) – ORLANDO, FLORIDA

DESCRIPTION OF INSTITUTION'S OPERATIONS

First Commercial Bank has designated two assessment areas for the purpose of CRA: the Orlando assessment area which is comprised of all of Orange, Osceola, and Seminole counties; and the Deltona assessment area which is comprised of 23 census tracts in Volusia County. Orange, Osceola and Seminole counties are part of the Orlando-Kissimmee MSA. Volusia County makes up part of the Deltona-Daytona Beach-Ormond Beach MSA. The Deltona assessment area was added when the West Volusia branch office was opened in 2007.

First Commercial Bank of Florida's performance in the Orlando assessment area was reviewed using full-scope examination procedures. As stated earlier in this report, the bank currently operates eight banking offices and eight ATMs in the Orlando Assessment Area.

Demographic Data by Census Tracts

2000 census demographic data was used to define the bank's assessment area and analyze loans originated during the review period. The assessment area includes 296 census tracts, 8 (2.7 percent) of which are low-income tracts, 67 (22.6 percent) are moderate-income tracts, 129 (43.6 percent) are middle-income tracts, and 92 (31.1 percent) are upper-income tracts.

Population Information

According to the 2000 census, the population of the Orlando assessment area was 1,434,033, which represented nearly 9 percent of the state of Florida's total population of 15,982,378 at the time.

Income Characteristics

2000 census information shows there were 365,683 families in the assessment area. Of the total families in the assessment area, 18.3 percent were low-income, 18.1 percent were moderate-income, 22.4 percent were middle-income, and 41.2 percent upper-income. The HUD-estimated median family incomes for the Orlando-Kissimmee, Florida MSA were \$54,900 in 2007 and \$59,200 in 2008. Based on the HUD-estimated median family income for 2008, low-income families were those families with incomes of \$29,600 or less. Moderate-income families were those families with incomes between \$29,601 and \$47,360.

Employment Statistics

According to the 2006 Regional Economic Information Systems (REIS) data, employment in the Orlando-Kissimmee MSA was primarily dependent on retail trade, administrative and waste services, accommodation and food services, and government and government enterprises. The table on the next page provides the unemployment rates for Orange County, Osceola County, Seminole County, the Orlando-Kissimmee MSA, and the state of Florida. For 2008, the unemployment rates increased for all of the counties, the MSA, and the state of Florida.

UNEMPLOYMENT RATE (Not Seasonally Adjusted)		
Region	2007 (<i>annualized</i>)	December 2008
Orange County	3.8	5.6
Osceola County	4.3	6.3
Seminole County	3.5	5.4
Orlando-Kissimmee-MSA	3.8	5.7
State of Florida	4.0	6.0

Business Size Characteristics

The table on page 7 provides key demographic business data by census tract income level in the Orlando assessment area. The table indicates that according to the 2000 census, 89.1 percent of the businesses in the assessment area had gross annual revenues of \$1 million or less. For purposes of this report, businesses with \$1 million or less in gross annual revenues are considered small businesses.

Competition

The bank operates in a highly competitive market. According to the FDIC Market Share Report as of June 30, 2008, there are 45 financial institutions operating 511 branches within the assessment area. First Commercial Bank of Florida ranked 11th among the competing financial institutions with \$561.8 million in deposits, which represented approximately 2.1 percent of the deposit market share in the assessment area. The number of locations operated by a single financial institution in the assessment area ranged from 1 to 61 locations. SunTrust Bank, Bank of America, and Wachovia Bank made up the top three banks with deposit market share of approximately 22.1 percent, 18 percent, and 16.5 percent, respectively.

The table on the next page shows selected demographic data for the Orlando Assessment Area. Certain components of the data in the table are discussed in this evaluation as they apply to particular parts of the analysis.

Assessment Area Demographics

Assessment Area: Orlando, FL

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	8	2.7	5,752	1.6	2,312	40.2	67,099	18.3
Moderate-income	67	22.6	75,541	20.7	11,173	14.8	66,080	18.1
Middle-income	129	43.6	163,938	44.8	11,732	7.2	81,791	22.4
Upper-income	92	31.1	120,452	32.9	3,545	2.9	150,713	41.2
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	296	100.0	365,683	100.0	28,762	7.9	365,683	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	10,103	2,590	0.8	25.6	6,578	65.1	935	9.3
Moderate-income	128,866	55,013	16.1	42.7	62,020	48.1	11,833	9.2
Middle-income	269,462	156,124	45.6	57.9	91,019	33.8	22,319	8.3
Upper-income	172,290	128,774	37.6	74.7	34,717	20.2	8,799	5.1
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	580,721	342,501	100.0	59.0	194,334	33.5	43,886	7.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	1,445	2.1	1,234	2.0	187	3.1	24	1.8
Moderate-income	14,074	20.8	12,198	20.3	1,553	25.7	323	24.7
Middle-income	29,916	44.3	26,674	44.3	2,652	43.9	590	45.1
Upper-income	22,117	32.7	20,100	33.4	1,647	27.3	370	28.3
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	67,552	100.0	60,206	100.0	6,039	100.0	1,307	100.0
	Percentage of Total Businesses:			89.1		8.9		1.9

Based on 2000 Census Information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Commercial loans originated between January 1, 2007 and December 31, 2008 were reviewed for this analysis. A full scope review was performed on the Orlando assessment area where the bank's lending activity was greatest. The following table shows selected lending data for the bank in the Orlando assessment area. Certain components of the data in the table are discussed in this evaluation as they apply to particular parts of the analysis.

Loan Distribution Table

Assessment Area: Orlando, FL

	Commercial Loans			
	#	%	\$(000s)	%
	By Tract Income			
Low	2	1.7%	129	0.2%
Moderate	24	20.7%	14,570	19.6%
Middle	50	43.1%	35,150	47.3%
Upper	40	34.5%	24,535	33.0%
Unknown	0	0.0%	0	0.0%
Total	116	100.0%	74,384	100.0%
	By Revenue			
\$1 Million or Less	32	27.6%	16,851	22.7%
Over \$1 Million	34	29.3%	18,737	25.2%
Not Known	50	43.1%	38,796	52.2%
Total	116	100.0%	74,384	100.0%
	By Loan Size			
\$100,000 or less	35	30.2%	1,555	2.1%
\$100,001 - \$250,000	23	19.8%	3,974	5.3%
\$250,001 - \$1 Million	36	31.0%	18,552	24.9%
Over \$1 Million	22	19.0%	50,303	67.6%
Total	116	100.0%	74,384	100.0%

Originations and Purchases

Geographic Distribution of Loans

For this analysis, the geographic distribution of commercial lending was compared with available demographic information. Performance context issues were also considered, including economic information in the assessment area.

Of the 116 commercial loans originated in the Orlando, Florida assessment area, 1.7 percent were extended to businesses in low-income census tracts, which is less than the percentage of businesses located in these tracts at 2.1 percent. The bank made 20.7 percent of its small business loans in moderate-income tracts, which is equivalent to the percentage of businesses located in these tracts at 20.8 percent.

Based on demographic factors and other performance context considerations, First Commercial Bank of Florida's performance with regard to the geographic distribution of commercial lending reflects reasonable dispersion throughout the assessment area.

Lending to Businesses of Different Sizes

Of the 116 commercial loans originated in this assessment area during the review period, revenue was known for only 66 of these borrowers. The other 50 loans were made to individuals or to single-purpose entities that were created only to hold the properties and investments being financed. Of the loans originated with known revenues, 32 loans (48.4 percent) were made to businesses with revenues of \$1 million or less. This is less than

the percentage of small businesses in the assessment area at 89.1 percent. It should be noted that nearly 50 percent of the bank's commercial loans were originated in amounts of \$250,000 or less, indicating a willingness to make small loans to businesses. In addition, management stated that the bank's loan demand, particularly from small construction companies and real estate developers, began to slow at the beginning of 2007 as a result of the downturn in the economy and remained slow during 2008.

Based on the bank's commercial real estate focus and declining economic conditions, First Commercial Bank of Florida's lending performance reflects reasonable penetration among businesses of different sizes.

Community Development Test

First Commercial Bank of Florida's community development performance demonstrates adequate responsiveness to the community development needs of the assessment area through community development loans, qualified contributions, and community development services, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment area.

The bank originated three community development loans totaling \$10,560,000 to finance 288 affordable housing units in the assessment area. One loan provided financing to construct a 72 unit townhome development. The rental amount for each unit falls within HUD's Fair Market Rent (FMR) amount, and is considered affordable for a moderate-income family. Another loan provided financing to purchase a 200 unit apartment complex for the purpose of renovating the units and converting them to condominiums for sale. The property is located in a moderate-income tract and is in a community with a mix of commercial, low-income residential, retail, and industrial properties. The sales price is expected to average less than \$100,000 per unit, and the project will provide down payment assistance for first time home buyers. Finally, the bank refinanced a loan on a 16 unit apartment complex that provides affordable rents to low-and moderate-income families.

First Commercial Bank of Florida is a participant in the Florida Business Development Corporation's Small Business Administration (SBA) 504 Program. The corporation provides small businesses with long-term, below market rate loans for the acquisition of land and building, machinery and equipment, and for construction and renovation. The bank originated \$6.8 million in SBA 504 guaranteed loans during the review period.

In addition, First Commercial Bank of Florida is an approved Certified Lender Program (CLP) lender through the SBA. This program provides those lenders who have a successful SBA lending track record and a thorough understanding of SBA policies and procedures, with expeditious service on loan applications submitted to the SBA. CLP lenders are expected to perform a complete analysis of the application and, in return, SBA promises a fast loan decision. The bank generally offers SBA Express loans as a companion loan or line of credit to existing customers. Bank management stated that the volume of Express loans has been low because of economic conditions and the inability to find viable businesses in the area.

Qualified donations for the review period totaled \$5,600. These donations supported community services that target low- and moderate- income families or individuals.

Delivery systems, including ATMs and branch locations are considered reasonably accessible to most of the Orlando assessment area. Although none of the bank's branch offices are located in low-or moderate-income tracts, several of the bank's branch offices are in close proximity to these tracts.

Bank employees have used their financial expertise to provide services that benefit low-and moderate-income residents and small businesses in the assessment area. One employee serves as president of the Orlando Union Rescue Mission Foundation. This organization serves families in crisis, providing temporary housing for the homeless, job training, and other basic services to families in need of assistance. In addition, another bank employee provided counseling to small businesses through the Small Business Resource Network & National

Entrepreneur Center. Additional community development services the bank provides are included in the following table.

COMMUNITY DEVELOPMENT SERVICES ORLANDO, FLORIDA ASSESSMENT AREA		
Organization	Type of Organization/Purpose	Activity/Service Provided
Junior Achievement	This organization educates students about workforce readiness, entrepreneurship and financial literacy.	A bank representative provided financial expertise by regularly speaking to middle school students.
Small Business Resource Network & National Entrepreneur Center	This organization assists small businesses with specific legal, financial and insurance counseling. Participating members have expertise in banking, law, commercial real estate, and accounting.	A bank representative provides financial expertise by serving on the member steering committee and regularly provides counseling to small business candidates.
Habitat for Humanity Osceola County, Florida	This is a non-profit organization that works in partnership with people in need to renovate and build affordable housing.	A bank representative provides financial expertise by serving on the board of directors.
Orlando Union Rescue Mission	This is a non-profit organization that provides services to families in crisis, such as providing temporary housing, job training, and other basic services to families in need.	A bank representative provides financial expertise by serving on the board of directors and participating in business affairs related to the organization.
Kiwanis Club of South Orlando	This organization provides shelter, food, and mentoring for disadvantaged youths.	Bank representatives provide financial expertise by serving on the board of directors.
Orlando Regional Chamber of Commerce	This organization promotes small businesses in the local community by hosting networking events and providing educational forums.	Bank representatives provide financial expertise by serving on the board of directors.

METROPOLITAN AREA (REVIEWED WITHOUT USING FULL-SCOPE PROCEDURES) – DELTONA, FLORIDA

The following assessment area was reviewed without using full-scope examination procedures; however, conclusions are presented through the use of available facts and data, including performance and demographic information. These conclusions did not impact the overall rating. Please refer to the tables in Appendix B for demographic and lending information regarding this assessment area.

Description of Institution’s Operations

The bank has a very small presence in the Deltona assessment area with only one full service branch and one ATM. First Commercial Bank of Florida ranks 23rd out of 28 banks in the assessment area, with a deposit market share of 0.5 percent. The bank faces heavy competition from regional banks and larger local community banks.

Conclusions with Respect to Performance Tests

The bank’s performance with regard to the level and distribution of lending in the Deltona assessment area was lower than and consequently inconsistent with the bank’s overall performance. Also, the bank’s community development performance in the Deltona assessment area was lower than the overall performance. The bank’s small and recent presence in this area, along with the highly competitive market in which it operates, accounted for this disparity. The bank originated only two commercial loans in this assessment area in the review period.

Assessment Area	Lending Test	Community Development Test
Deltona, Florida	Inconsistent	Below

APPENDIX A

SCOPE OF EXAMINATION

TIME PERIOD REVIEWED January 1, 2007 through December 31, 2008 – Lending Test March 8, 2005 through December 31, 2008 – Community Development Test		
FINANCIAL INSTITUTION First Commercial Bank of Florida, Orlando, Florida		PRODUCTS REVIEWED Commercial Loans
AFFILIATE(S) N/A	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED None

LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION

ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Orlando, Florida	Full Scope Exam Procedures	East Orange Branch	
Deltona, Florida	Limited Scope Exam Procedures		

APPENDIX B

DEMOGRAPHIC/LOAN DISTRIBUTION TABLES – LIMITED REVIEW AREA

Assessment Area Demographics

Assessment Area: Deltona, FL

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0	0	0.0	0	0.0	7,062	15.7
Moderate-income	3	13.0	2,801	6.2	682	24.3	8,856	19.7
Middle-income	19	82.6	39,856	88.8	2,353	5.9	11,024	24.6
Upper-income	1	4.3	2,224	5.0	150	6.7	17,939	40.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	23	100.0	44,881	100.0	3,185	7.1	44,881	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0	0.0	0	0.0	0	0.0
Moderate-income	5,493	2,338	4.6	42.6	2,537	46.2	618	11.3
Middle-income	59,185	46,065	90.3	77.8	8,752	14.8	4,368	7.4
Upper-income	3,219	2,605	5.1	80.9	452	14.0	162	5.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	67,897	51,008	100.0	75.1	11,741	17.3	5,148	7.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0.0	0	0.0	0	0.0	0	0.0
Moderate-income	855	13.0	778	12.6	56	18.4	21	14.8
Middle-income	5,258	79.7	4,931	80.1	220	72.4	107	75.4
Upper-income	488	7.4	446	7.2	28	9.2	14	9.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	6,601	100.0	6,155	100.0	304	100.0	142	100.0
	Percentage of Total Businesses:			93.2		4.6		2.2

Based on 2000 Census Information.

APPENDIX B (Continued)

Loan Distribution Table

Assessment Area: Deltona, FL

	Commercial Loans			
	#	%	\$(000s)	%
	By Tract Income			
Low	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%
Middle	1	50.0%	210	35.6%
Upper	1	50.0%	380	64.4%
Unknown	0	0.0%	0	0.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>590</i>	<i>100.0%</i>
	By Revenue			
\$1 Million or Less	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%
Not Known	2	100.0%	590	100.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>590</i>	<i>100.0%</i>
	By Loan Size			
\$100,000 or less	0	0.0%	0	0.0%
\$100,001 - \$250,000	1	50.0%	210	35.6%
\$250,001 - \$1 Million	1	50.0%	380	64.4%
Over \$1 Million	0	0.0%	0	0.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>590</i>	<i>100.0%</i>

Originations and Purchases

APPENDIX C

GLOSSARY

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

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

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

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives 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 (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

APPENDIX C (Continued)

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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 (for example, geographic distribution, borrower distribution, total number and dollar amount of investments and branch distribution).

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

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

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

APPENDIX C (Continued)

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

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

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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.

Upper-income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

APPENDIX D

DEFINITIONS AND ABBREVIATIONS

ATMs -	Automated Teller Machines
CDE -	Community Development Enterprise
CDFI -	Community Development Financial Institution
CRA -	Community Reinvestment Act
FDIC -	Federal Deposit Insurance Corporation
FHA -	Federal Housing Administration
HMDA -	Home Mortgage Disclosure Act
HUD -	Department of Housing and Urban Development
LTD -	Loan-to-Deposit Ratio
LTV -	Loan-to-Value Ratio
MD -	Metropolitan Division
MSA -	Metropolitan Statistical Area
OMB -	Office of Management and Budget
REIS -	Regional Economic Information Systems
SBA -	Small Business Administration
USDA -	United States Department of Agriculture

ROUNDING CONVENTION

Because percentages presented in tables were rounded to the nearest whole number in most cases, some columns may not total exactly 100 percent.

APPENDIX E

GENERAL INFORMATION

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

This document is an evaluation of the CRA performance of **First Commercial Bank of Florida** prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of **March 16, 2009**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include visits to some, but not necessarily all, of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.