

PUBLIC DISCLOSURE

October 28, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Florida Bank
201 North Franklin Street, Suite 100
Tampa, Florida 33602**

RSSD ID NUMBER: 704737

**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

	PAGE
INSTITUTION'S CRA RATING	
Institution's Community Reinvestment Act (CRA) Rating.....	1
Summary of Major Factors Supporting Rating.....	1
INSTITUTION	
Scope of Examination.....	2
Description of Institution.....	2
Conclusions with Respect to Performance Tests.....	4
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....	5
METROPOLITAN AREA FULL-SCOPE REVIEW	
Description of Institution's Operations in the Tampa-St. Petersburg-Clearwater MSA.....	6
Conclusions with Respect to Performance Tests.....	13
METROPOLITAN AREA LIMITED-SCOPE REVIEW	
Description of Institution's Operations in the Jacksonville MSA.....	19
Conclusions with Respect to Performance Tests.....	19
METROPOLITAN AREA LIMITED-SCOPE REVIEW	
Description of Institution's Operations in the North Port-Bradenton-Sarasota MSA.....	19
Conclusions with Respect to Performance Tests.....	19
METROPOLITAN AREA LIMITED-SCOPE REVIEW	
Description of Institution's Operations in the Tallahassee MSA.....	20
Conclusions with Respect to Performance Tests.....	20
APPENDICES	
Appendix A – Scope of Examination.....	21
Appendix B – Demographic/Loan Distribution Tables.....	22
Appendix C – Definitions and General Information.....	34
Appendix D – Glossary.....	36

INSTITUTION'S CRA RATING

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 Florida Bank with respect to the lending and community development tests.

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

Major factors supporting the institution's rating include the following:

- The bank's loan-to-deposit ratio is reasonable.
- A substantial majority of loans were made in the assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of lending by business size and borrower income reflects reasonable penetration among businesses of different sizes and individuals of different income levels.
- The bank demonstrates adequate responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, given the bank's capacity and constraints.

INSTITUTION

SCOPE OF EXAMINATION

The CRA performance evaluation assesses the bank's record of meeting the credit needs of its community, including low- and moderate-income neighborhoods, within the context of information such as asset size and financial condition of the institution, competitive factors, as well as the economic and demographic characteristics of its defined assessment areas. Florida Bank's CRA performance evaluation was based on CRA activities within its assessment areas using the Interagency Intermediate Small Institution Examination Procedures. Under these procedures, effective as of September 1, 2005, institutions meeting the threshold size are evaluated using two separately rated tests: a lending test and a community development test, which includes an evaluation of community development loans, investments, and services in light of community needs within its assessment areas and the capacity of the bank. Responsiveness to consumer complaints was not evaluated as the bank did not receive any CRA-related complaints during this review period.

For CRA purposes, Florida Bank has four assessment areas: Tampa, Jacksonville, Sarasota, and Tallahassee. Performance in the Tampa assessment area was evaluated using full-scope examination procedures because a majority of the bank's lending occurs in this assessment area. Performance in the Jacksonville, Sarasota, and Tallahassee assessment areas was reviewed using limited-scope procedures.

The bank is a HMDA reporter but does not report data on small business loans; however, the bank makes more commercial loans by number than HMDA loans; therefore, commercial loans were included in the evaluation. The lending test included an analysis of 136 commercial loans in amounts of \$1 million or less and 29 HMDA loans that were originated or renewed from January 1, 2012, through December 31, 2012. The community development test covered community development loans, investments, and service activities from August 1, 2011, through August 1, 2013.

As part of this evaluation, two community contacts were consulted for information about the economic and demographic characteristics, and community development opportunities in the assessment areas. Information obtained from these contacts was used to establish a context for the communities in which the bank operates and to gather information on the bank's performance. Specific information obtained from the community contacts is included in the full-scope assessment area section.

DESCRIPTION OF INSTITUTION

Florida Bank is a full-service commercial bank headquartered in Tampa, Florida. The bank is a wholly owned subsidiary of Florida Bank Group, Inc., a single-bank holding company also headquartered in Tampa.

Since the bank's last CRA evaluation, the bank's total assets decreased from \$782.9 million on June 30, 2011, to \$558.6 million on June 30, 2013, or by approximately 28.6 percent. The CRA examination considered the bank's financial capacity, local economic conditions and demographics, including the competitive environment in which it operates. The bank entered into a public Written Agreement with the Federal Reserve Bank of Atlanta in 2011 that requires the bank to address asset and capital matters and improve earnings. As a result, the bank has had operating constraints that have affected its ability to fully meet the credit needs of its assessment areas.

The bank received a "Satisfactory" CRA rating at its previous evaluation dated October 24, 2011, conducted by the Federal Reserve Bank of Atlanta under the Intermediate Small Institution Examination Procedures.

Branch Offices

The bank operates 13 banking offices with ATM services in Florida: the main office and seven branches are located in the Tampa area, three branches in the Jacksonville area, one branch in Sarasota, and one branch in Tallahassee. The bank closed one branch in Tallahassee in November 2012 and has not opened any branches since the previous examination.

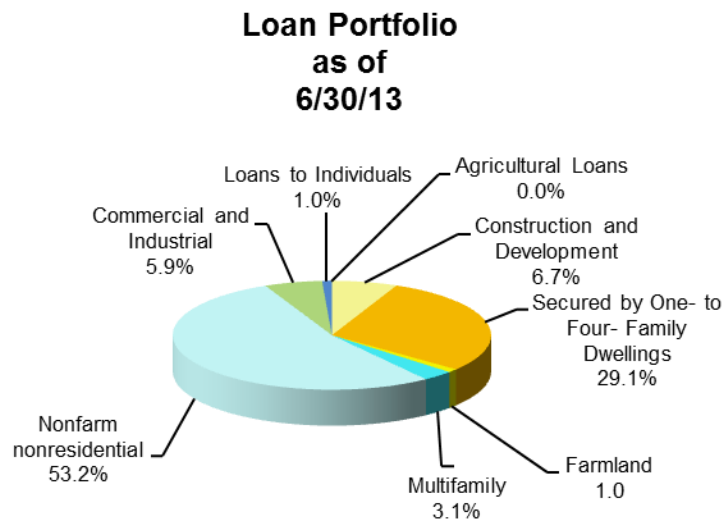
Loan Portfolio

The following charts show the composition of the loan portfolio according to the Consolidated Reports of Condition and Income.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	6/30/2013		12/31/2012		12/31/2011	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	23,055	6.7%	28,771	7.4%	39,050	8.2%
Secured by One- to Four- Family Dwellings	100,889	29.1%	110,010	28.2%	139,066	29.2%
Other Real Estate: Farmland	3,574	1.0%	3,997	1.0%	6,187	1.3%
Multifamily	10,908	3.1%	11,420	2.9%	19,047	4.0%
Nonfarm nonresidential	184,176	53.2%	209,002	53.6%	235,572	49.4%
Commercial and Industrial	20,347	5.9%	23,274	6.0%	33,643	7.1%
Loans to Individuals	3,446	1.0%	3,469	0.9%	4,370	0.9%
Agricultural Loans	0	0.0%	0	0.0%	0	0.0%
Total	\$346,395	100.00%	\$389,943	100.00%	\$476,935	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 above, the bank remains primarily focused on real estate lending. Loans secured by nonfarm nonresidential property (commercial real estate) make up the largest percentage of the loan portfolio at 53.2 percent of total loans, followed by loans secured by one- to four-family dwellings at 29.1 percent. Total loans declined by 27.4 percent over the period shown, but the loan mix did not change significantly.



Credit Products

Business loan products offered by the bank include lines of credit, term loans, real estate loans, and SBA loans. Personal loan products include residential mortgage loans, home equity loans and lines of credit, auto loans, and cash secured loans.

Assessment Areas

For purposes of the CRA, Florida Bank has four assessment areas, which are listed below. The assessment areas have not changed since the previous examination.

- The Tampa assessment area consists of Hillsborough and Pinellas Counties. These counties are part of the Tampa-St. Petersburg-Clearwater, Florida MSA.
- The Jacksonville assessment area consists of Duval and St. Johns Counties. These counties are part of the Jacksonville, Florida MSA.
- The Sarasota assessment area consists of Manatee and Sarasota Counties. These two counties make up the North Port-Bradenton-Sarasota, Florida MSA.
- The Tallahassee assessment area consists of Leon and Gadsden Counties. These counties are part of the Tallahassee, Florida MSA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

The lending test rating is satisfactory. The loan-to-deposit ratio is reasonable, and a substantial majority of loans were made inside the assessment areas. The geographic distribution of loans is reasonable as is the distribution of loans by business revenue and borrower income.

Loan-to-Deposit Ratio

Florida Bank’s average net loan-to-deposit ratio for the eight-quarter period ending June 30, 2013, was 76.5 percent and is considered reasonable given the institution’s size, financial condition, lending strategy, and assessment area credit needs. The bank’s loan-to-deposit ratio ranged from a high of 78.4 percent as of September 30, 2011, to a low of 74.8 percent as of June 30, 2013. Florida Bank’s average loan-to-deposit ratio was compared with the average loan-to-deposit ratios of four other financial institutions of similar asset size with branch offices in the assessment areas. The average ratios of these banks for the same time period ranged from 63.4 percent to 99.5 percent.

Assessment Area Concentration

The following table shows, by product type, the number and percentage of loans reviewed that were made inside and outside the assessment areas. A substantial majority of the HMDA and commercial loans, by both number and dollar amount, were within the assessment areas. This indicates the bank’s willingness to originate loans that meet the credit needs of its assessment areas.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	2	100	\$85	100	0	0	\$0	0
Home Purchase - Conventional	14	87.5	\$3,245	93	2	12.5	\$246	7
Refinancing	13	100	\$3,225	100	0	0	\$0	0
Total HMDA related	29	93.5	\$6,555	96.4	2	6.5	\$246	3.6
Commercial	136	91.9	\$38,226	93.8	12	8.1	\$2,545	6.2
Total Commercial related	136	91.9	\$38,226	93.8	12	8.1	\$2,545	6.2
TOTAL LOANS	165	92.2	\$44,781	94.1	14	7.8	\$2,791	5.9

Note: Affiliate loans not included

Distribution of Lending by Geography, Business Size, and Borrower Income

The geographic distribution of commercial and HMDA loans reflects reasonable dispersion throughout the assessment areas, given the opportunity and competition in these markets. This conclusion was based on the bank's performance in its assessment areas considering performance context information and in comparison to available demographic and aggregate lending data. In addition, the distribution of lending by business size and borrower income reflects reasonable penetration among businesses of different sizes and individuals of different income levels. Details of the analyses of commercial and HMDA lending within each assessment area are presented later in this report.

COMMUNITY DEVELOPMENT TEST

The community development test rating is satisfactory. The bank demonstrates adequate responsiveness to community development needs in its assessment areas through a combination of community development loans, qualified investments, and community development services, considering the bank's capacity and constraints.

Bank wide community development lending consisted of seven loans totaling \$1.9 million, which included new originations, renewals, and participation loans. Five loans totaling \$1.1 million were for the purpose of affordable housing, and two loans totaling \$832,175 promoted economic development by financing small businesses. Two of the affordable housing loans (totaling \$23,180) involved properties outside the bank's assessment areas but were made in connection with statewide programs addressing affordable housing needs in Florida.

The bank had a \$500,000 current period community development investment in a nationwide fund that has community development as a primary purpose. The investment supports affordable housing for low- and moderate-income individuals inside the assessment area. The property benefiting from this investment has income restrictions that result in all units being affordable to low- and moderate-income individuals and families. Additionally, bank wide, staff contributed four hours of qualified community development services by providing financial-related information and instruction targeted to primarily low- and moderate-income audiences.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of prohibited discrimination or the use of other illegal credit practices was noted during the examination. The bank is in compliance with the substantive provisions of antidiscrimination laws and regulations.

METROPOLITAN AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TAMPA ASSESSMENT AREA

Overview

The assessment area consists of Hillsborough and Pinellas counties, two of the four counties that make up the Tampa-St. Petersburg-Clearwater, Florida MSA. Eight of the bank’s 13 offices, including the main office in downtown Tampa, are located in this assessment area, representing approximately 62 percent of the total branch network. As of June 30, 2013, the bank had deposits of \$316.3 million in this assessment area, representing 69.9 percent of the bank’s total deposits. Also, 101 (74.3 percent) of the 136 commercial loans and 24 (82.8 percent) of the 29 HMDA loans used in the analysis were in the Tampa assessment area.

Population Information

According to 2010 census data, the assessment area’s total population was 2.1 million, representing 11.4 percent of the total statewide population. Hillsborough County, Florida’s fourth most populous county and home to the city of Tampa, contains 57 percent of the assessment area’s total population with 1.2 million residents. At 23.1 percent, population growth in Hillsborough County from 2000 to 2010 was robust, exceeding the state’s growth rate of 17.6 percent. Pinellas County, on the other hand, experienced a small decrease in its population during this same time period.¹

Income Characteristics

For purposes of classifying borrower income, this evaluation uses the Department of Housing and Urban Development’s (HUD) estimated median family income for the relevant area. The following table shows the estimated median family income for 2012 for the Tampa MSA. The table also provides a range of the estimated annual family income for each income category (low, moderate, middle, and upper).

Borrower Income Levels
Tampa - St. Petersburg - Clearwater, FL MSA

HUD Estimated Median Family Income	Low	Moderate	Middle	Upper
	0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2012 \$56,400	0 - \$28,199	\$28,200 - \$45,119	\$45,120 - \$67,679	\$67,680 - & above

2010 census data shows 525,888 families in the assessment area. Of those families, 20.1 percent were low-income, 17.8 percent were moderate-income, 19.5 percent were middle-income, and 42.6 percent were upper-income. Of the total families, 50,314 (9.6 percent) had incomes below the poverty level. Compared to 2000 census data, the distribution of families by income level has not changed significantly, although the percentage of families living below the poverty level increased from 7.9 percent.

Food stamp usage, an indicator of financial distress, has been on the rise in the assessment area in recent years. In 2010, 18.7 percent of the population in Hillsborough County and 14.1 percent in Pinellas County received food stamps. Statewide, 15.9 percent of the population received food stamps in 2010.²

¹ U.S. Census Bureau. Accessed through PolicyMap. (accessed on October 18, 2013); available from www.policymap.com.

² U.S. Census Bureau. Accessed through PolicyMap. (accessed on October 18, 2013); available from www.policymap.com.

Assessment Area Demographics

The following table provides demographic characteristics of the Tampa assessment area based on the 2010 census. Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis. As shown in the table, the assessment area contains 565 census tracts. 30 (5.3 percent) are low-income tracts, 124 (21.9 percent) are moderate-income tracts, 230 (40.7 percent) are middle-income tracts, 172 (30.4 percent) are upper-income tracts, and 9 (1.6 percent) have unknown income levels.

Combined Demographics Report

Assessment Area: Tampa

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	30	5.3	19,583	3.7	7,161	36.6	105,850	20.1
Moderate-income	124	21.9	109,511	20.8	18,240	16.7	93,400	17.8
Middle-income	230	40.7	215,857	41.0	17,779	8.2	102,582	19.5
Upper-income	172	30.4	180,927	34.4	7,134	3.9	224,056	42.6
Unknown-income	9	1.6	10	0.0	0	0.0	0	0.0
Total Assessment Area	565	100.0	525,888	100.0	50,314	9.6	525,888	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	40,450	12,122	2.1	30.0	21,456	53.0	6,872	17.0
Moderate-income	231,605	103,153	17.8	44.5	88,971	38.4	39,481	17.0
Middle-income	429,357	249,535	43.2	58.1	117,133	27.3	62,689	14.6
Upper-income	327,629	213,405	36.9	65.1	62,268	19.0	51,956	15.9
Unknown-income	53	0	0.0	0.0	53	100.0	0	0.0
Total Assessment Area	1,029,094	578,215	100.0	56.2	289,881	28.2	160,998	15.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4,950	3.1	4,257	2.9	437	5.5	256	5.0
Moderate-income	30,096	19.1	26,889	18.6	2,031	25.6	1,176	22.9
Middle-income	62,363	39.6	57,110	39.6	3,322	41.9	1,931	37.6
Upper-income	59,775	38.0	55,911	38.7	2,103	26.5	1,761	34.3
Unknown-income	236	0.1	187	0.1	34	0.4	15	0.3
Total Assessment Area	157,420	100.0	144,354	100.0	7,927	100.0	5,139	100.0
Percentage of Total Businesses:				91.7		5.0		3.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	30	2.7	28	2.7	2	3.7	0	0.0
Moderate-income	165	15.0	154	14.7	10	18.5	1	50.0
Middle-income	487	44.2	464	44.3	23	42.6	0	0.0
Upper-income	421	38.2	401	38.3	19	35.2	1	50.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	1,103	100.0	1,047	100.0	54	100.0	2	100.0
Percentage of Total Farms:				94.9		4.9		.2

Based on 2012 D&B information according to 2010 ACS Boundaries.

Housing Characteristics

The 2010 census data shows 1,029,094 housing units in the assessment area. 578,215 units (56.2 percent) were owner-occupied, 28.2 percent were rental units, and 15.6 percent were vacant. While a majority of the units were owner-occupied, a higher percentage of housing in low-income tracts consisted of rental units, indicating reduced opportunities for mortgage origination in these geographies. The percentage of rental units is higher in Hillsborough County than in Pinellas County and statewide, whereas the percentage of vacant units is lower in Hillsborough County than in Pinellas County and statewide.

The median age of the housing stock in the assessment area in 2010 was 32 years, but this figure increased to 40 years in low-income tracts and 36 years in moderate-income tracts. Statewide, the median age was 25 years. Generally, the housing stock is older in Pinellas County.

The housing crisis significantly affected the Tampa assessment area. In the population center of Hillsborough County, single-family median home prices peaked in 2006 at \$237,000 and then proceeded to rapidly decline, reaching \$130,000 in 2012 – a 45 percent drop. Median condo prices were hit even harder, dropping 69 percent from their peak price of \$179,900 in 2007 to \$55,000 in 2011.³ Nonetheless, housing prices remain more affordable in the assessment area than statewide. As of the 2010 census, the median housing value in the assessment area was \$192,634, which was less than the statewide median value of \$205,600.

Mortgage delinquencies and reduced loan demand have also influenced the local housing market. The percentage of seriously delinquent mortgages in the assessment area, which includes loans 90 days or more past due, remained greater than 14 percent throughout 2011 and 2012.⁴ Furthermore, HMDA data for the assessment area shows that demand for home purchase loans of owner-occupied, one- to four-family dwellings continues to be weak across the assessment area, declining from a high of 50,257 loans in 2005 to 14,128 in 2011, a reduction of nearly 72 percent. Refinance activity has exhibited a similar trend, likely due to loss of equity experienced by homeowners as a result of the housing crisis in Florida.⁵

Employment and Economic Conditions

The Tampa area is considered a tourist destination with its white sandy beaches, attracting an estimated 14.8 million visitors in 2012. The economic impact of tourism in 2012 was more than \$3.7 billion.⁶ According to Regional Economic Information System (REIS) data for 2011, primary employment sectors in Hillsborough and Pinellas Counties included health care and social assistance, retail trade, and government and government enterprises. Some of the area's largest employers include Publix Super Markets, BayCare Health System, Wal-Mart, Verizon Communications, TECO Energy, and MacDill Air Force Base.⁷ The total economic impact of MacDill Air Force Base on the Greater Tampa Bay Region is approximately \$5.0 billion, which includes \$2.9 billion from base operations and an additional \$2.1 billion from the retiree population within 50 miles.⁸ The area is also home to several institutions of higher learning, including the University of South Florida (USF) and the University of Tampa, multiple professional sports teams, and the Busch Gardens theme park.

According to the Institute for Economic Competitiveness at the University of Central Florida (UCF), the Tampa economy is expected to show moderate growth moving forward. The Tampa MSA is projected to experience a population growth rate of 1.2 percent, and employment is expected to grow by 2.5 percent annually, with the

³ Shimberg Center for Housing Studies. (accessed on April 11, 2013); available from <http://www.shimberg.ufl.edu/index.html>.

⁴ Federal Reserve Bank of Atlanta calculations of data provided by LPS.

⁵ FFIEC. Home Mortgage Disclosure Act. Accessed through PolicyMap. (accessed on September 5, 2012); available from www.policymap.com.

⁶ Tampa Bay and Co. (accessed on October 21, 2013); available from http://www.visittampabay.com/includes/media/docs/For-Website_2012-Value-of-Tourism.pdf.

⁷ Tampa Bay's Top 10. (accessed on October 21, 2013); available from <http://www.tampastop10.com/Employers.aspx>.

⁸ MacDill Air Force Base. (accessed on April 10, 2013); available from http://www.macdill.af.mil/library/factsheets/factsheet_print.asp?fsID=18801&page=1.

fastest growing sector being the construction and mining sector followed by the professional and business service sector.⁹ Other notable aspects for the regional economy include the Center for Advanced Medical Learning and Simulation, an extension of USF that recently opened in St. Petersburg as a training facility for robotic surgery. This development is expected to be a boon for the local economy as the Center will attract doctors from around the country for multiday training programs. Additionally, St. Petersburg is home to Crystal Clear Technologies, one of the fastest-growing private companies in the nation as a provider of IT and cyber-security services to the U.S. military.¹⁰

The following table shows the 2011 and 2012 unemployment rates for the two counties in the assessment area, the Tampa MSA, and the State of Florida.

Unemployment Rates

Assessment Area: Tampa

Area	Years - Annualized	
	2011	2012
Hillsborough Co.	10.2	8.5
Pinellas Co.	10.3	8.5
Tampa MSA	10.6	8.8
Florida	10.3	8.6

Not Seasonally Adjusted

Source: Bureau of Labor Statistics

Unemployment rates in the assessment area were similar to the statewide unemployment rate. Unemployment continues to present challenges for the local economy, but conditions are improving. The Tampa MSA's unemployment rate increased from 4.2 percent in 2007 to 11.8 percent in 2010 but has been declining thereafter.

Competition

The Tampa banking market is highly competitive and is dominated by a handful of national or super-regional banks. According to the June 30, 2013 FDIC Deposit Market Share Report for Hillsborough and Pinellas counties, Florida Bank ranked 22nd with a deposit market share of 0.6 percent.

Deposit Market Share and Ranking As of June 30, 2013			
Rank	Institution	Deposit Market Share	# Branches Inside Assessment Area
22 nd	Florida Bank	0.6%	8
Top Financial Institutions			
1 st	Raymond James Bank	16.2%	1
2 nd	Bank of America	16.0%	78
3 rd	Wells Fargo Bank	15.7%	67
	61 institutions in the assessment area	100.0%	635

⁹ University of Central Florida, Institute for Economic Competitiveness. 2013. (accessed on October 21, 2013); available from <http://iec.ucf.edu/file.axd?file=2013%2f7%2fflforecast-jul2013-s.pdf>.

¹⁰ University of Central Florida, Institute for Economic Competitiveness. 2012. (accessed on November 13, 2012); available from <http://iec.ucf.edu/file.axd?file=2012%2f10%2fflforecast-oct-2012-s.pdf>.

Community Contacts and Community Development Opportunities

Information was obtained from two community contacts regarding local economic conditions and the opportunities available to local financial institutions to participate in community development activities. One contact from an organization focused on helping small businesses succeed mentioned that economic conditions in the Tampa Bay area are slowly improving, although there have been few new start-up businesses, and smaller businesses are largely disappearing as they have been unable to compete with larger chains. The contact identified SBA 504 loans as the biggest opportunity for bank participation.

A contact from an organization specializing in affordable housing and community development also reported that local economic conditions are improving, but unemployment and lack of income remain challenges. One recent issue affecting local employment is the closure of a health care company located in St. Petersburg, which resulted in the elimination of nearly 1,000 jobs. Additionally, foreclosures are still prevalent, and more are expected as banks and servicers expedite the foreclosure process in light of increased housing demand. Affordable housing remains a concern for many local low- and moderate-income residents, and the contact reported that more bank participation is needed for mortgage origination, especially regarding small-dollar loan amounts for very-low income buyers receiving down payment assistance, funding for homeownership counseling, and information-sharing with the nonprofit community. The contact suggested that more involvement is needed from banks in local community development activities.

The state of Florida received a significant allocation of funds under the federal government's Neighborhood Stabilization Program (NSP). The funds are available to help stabilize communities hard hit by the foreclosure crisis. The city of Tampa received \$13.6 million under the NSP1 allocation process and \$4.7 million under NSP3. NSP1 funds were acquired to purchase and rehabilitate residential properties in targeted neighborhoods with high incidences of foreclosure, resulting in affordable rental and home purchase units for income-qualified individuals. The NSP3 funds are being used for targeted rehabilitation of multifamily rental unit foreclosures.¹¹ Other entities in the area received NSP funding as well.

Hillsborough County is home to two enterprise zones, and Pinellas County has one. An enterprise zone is a specific geographic area targeted for economic revitalization. Enterprise zones encourage economic growth and investment in distressed areas by offering tax advantages and incentives to businesses locating within the zone boundaries. Some of the targeted industries in Florida enterprise zones include financial services, life sciences, manufacturing, and information technology.¹²

There are 24 certified community development financial institutions (CDFIs) located in Florida, consisting of credit unions and loan funds. Three CDFIs are located in Tampa, all of which administer loan funds. Community development opportunity also includes participation in the federal Low Income Housing Tax Credit (LIHTC) program, which provided an estimated \$41.6 million in tax credits to the state of Florida in 2012 for the provision of affordable housing.¹³ The state of Florida does not offer a separate LIHTC program for affordable housing development.

Bank On is a national initiative with local programs focused on connecting unbanked and underbanked individuals with traditional banking products and services in order to reduce costs and increase financial stability. Bank On St. Pete helps local residents without a checking or savings account learn to manage their money and save for the future. Several financial institutions with a presence in the local market participate in

¹¹ U.S. Department of Housing and Urban Development. "Neighborhood Stabilization Program, NSP Grantees" (accessed on August 29, 2012); available from <http://hudnspshelp.info/index.cfm?do=viewGranteeAreaResults>.

¹² Florida Enterprise Zones. (accessed on November 7, 2012); available from http://floridaenterprisezones.com/PageView.asp?PageType=R&edit_id=1.

¹³ Novogradac and Company LLP. "Affordable Housing Resource Center" (accessed on August 29, 2012); available from http://www.novoco.com/low_income_housing/lihtc/federal_lihtc.php.

the program.¹⁴ The organization estimates that 6.8 percent of households in St. Petersburg are unbanked, compared to 4.7 percent of households across the MSA. An estimated 10.3 percent of households in Tampa have no checking or savings account. Additionally, 19 percent of households in the MSA are listed as underbanked, meaning they have a bank account but continue to rely on alternative financial services, such as check-cashing services, payday loans, rent-to-own agreements, or pawn shops.¹⁵

¹⁴ Bank On St. Pete. (accessed on November 7, 2012); available from <http://www.bankonstpete.org/>

¹⁵ Bank On. 2011. (accessed on November 7, 2012); available from [http://webtools.joinbankon.org/community/profile?state=FL&place=St. percent20Petersburg](http://webtools.joinbankon.org/community/profile?state=FL&place=St.%20Petersburg).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

The bank's lending performance is satisfactory. The evaluation included 101 commercial loans and 24 HMDA loans made in the Tampa assessment area. Commercial lending was given more weight in determining the bank's lending performance in the assessment area because the bank makes more commercial loans than HMDA loans.

The geographic distribution of loans reflects reasonable penetration throughout the assessment area. The distribution of borrowers also reflects reasonable penetration among businesses of different sizes and borrowers of different income levels.

Geographic Distribution of Loans

For this analysis, the geographic distribution of commercial loans and HMDA loans was compared to available demographic information. HMDA lending was also compared to the aggregate performance of lenders in the assessment area. Performance context issues were taken into consideration. Considering all of these factors, the bank's geographic distribution of loans reflects reasonable dispersion throughout the assessment area.

Commercial Lending

The following table shows the geographic distribution of the commercial loans made in the Tampa assessment area in 2012.

Geographic Distribution of Commercial Loans

Assessment Area: Tampa

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2012				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	3	3.0%	\$1,030	3.5%	2.9%
Moderate	19	18.8%	\$4,635	15.7%	18.6%
Middle	39	38.6%	\$11,745	39.9%	39.6%
Upper	40	39.6%	\$12,034	40.9%	38.7%
Unknown	0	0.0%	\$0	0.0%	0.1%
Tr Unknown	0	0.0%	\$0	0.0%	0.1%
<i>Total</i>	<i>101</i>	<i>100.0%</i>	<i>\$29,444</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2012 D&B information according to 2010 ACS Boundaries.

The geographic distribution of commercial loans is excellent. As can be seen in the table above, the geographic distribution of the bank's loans is very similar to the distribution of small businesses in the assessment area. For example, the bank made 3.0 percent of its loans in low-income tracts, where 2.9 percent of the small businesses are located.

Residential Real Estate (HMDA) Lending

The following table shows the geographic distribution of Florida Bank's HMDA-reportable loans for 2012 originated in the Tampa assessment area. The table also includes a comparison of the bank's HMDA lending to the aggregate HMDA lenders within the assessment area. The HMDA aggregate data consists of the combined total of lending activity reported by all lenders subject to HMDA reporting requirements in the assessment area.

Geographic Distribution of HMDA Loans

Assessment Area: Tampa

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012					Bank & Aggregate Lending Comparison 2012					
		Bank		Owner Occupied Units	Count		Dollar					
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	0.9%	\$0	0.0%	0.5%
	Moderate	5	38.5%	\$467	14.8%	17.8%	5	38.5%	11.5%	\$467	14.8%	7.8%
	Middle	1	7.7%	\$80	2.5%	43.2%	1	7.7%	37.7%	\$80	2.5%	28.8%
	Upper	7	53.8%	\$2,599	82.6%	36.9%	7	53.8%	49.9%	\$2,599	82.6%	63.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>\$3,146</i>	<i>100.0%</i>	<i>100.0%</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,146</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.0%	\$0	0.0%	0.7%
	Moderate	2	20.0%	\$163	5.4%	17.8%	2	20.0%	9.7%	\$163	5.4%	6.9%
	Middle	2	20.0%	\$392	13.1%	43.2%	2	20.0%	37.1%	\$392	13.1%	30.9%
	Upper	6	60.0%	\$2,447	81.5%	36.9%	6	60.0%	52.2%	\$2,447	81.5%	61.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$3,002</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,002</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.2%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	14.6%	\$0	0.0%	5.5%
	Middle	0	0.0%	\$0	0.0%	43.2%	0	0.0%	41.4%	\$0	0.0%	29.0%
	Upper	1	100.0%	\$45	100.0%	36.9%	1	100.0%	42.8%	\$45	100.0%	64.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$45</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	4.2%	0	0.0%	8.2%	\$0	0.0%	8.5%
	Moderate	0	0.0%	\$0	0.0%	27.4%	0	0.0%	18.9%	\$0	0.0%	17.6%
	Middle	0	0.0%	\$0	0.0%	37.1%	0	0.0%	43.4%	\$0	0.0%	52.9%
	Upper	0	0.0%	\$0	0.0%	31.3%	0	0.0%	29.5%	\$0	0.0%	21.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.1%	0	0.0%	1.0%	\$0	0.0%	0.9%
	Moderate	7	29.2%	\$630	10.2%	17.8%	7	29.2%	10.5%	\$630	10.2%	7.6%
	Middle	3	12.5%	\$472	7.6%	43.2%	3	12.5%	37.5%	\$472	7.6%	30.8%
	Upper	14	58.3%	\$5,091	82.2%	36.9%	14	58.3%	51.1%	\$5,091	82.2%	60.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>24</i>	<i>100.0%</i>	<i>\$6,193</i>	<i>100.0%</i>	<i>100.0%</i>	<i>24</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,193</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
Based on 2010 ACS Data.

The geographic distribution of HMDA loans is reasonable. The bank’s predominant HMDA loan types are home purchase loans followed by refinancings, although overall HMDA volume is low. The bank did not make any HMDA loans in low-income tracts; however, only 2.1 percent of owner-occupied housing units in the assessment area are in low-income tracts. Aggregate lenders made a smaller percentage of their loans in low-income tracts as compared to the percentage of owner-occupied units. The bank’s performance was stronger in moderate-income tracts, particularly for home purchase and refinance loans, where it exceeded the percentage of owner-occupied units (17.8 percent) as well as aggregate performance. The bank made only one home improvement loan; it was in an upper-income tract.

Lending to Businesses of Different Sizes and Borrowers of Different Incomes

For this analysis, the distribution of the commercial loans across business revenue sizes and HMDA loans across borrower income levels was compared to available demographic information. HMDA lending was also compared to the aggregate performance of lenders in the assessment area. Performance context issues were taken into consideration. Considering all of these factors, the bank’s distribution of loans reflects reasonable penetration among businesses of different sizes and individuals of different income levels.

Commercial Lending

The following table shows, by business revenue and loan size, the number and dollar volume of commercial loans made in the Tampa assessment area in 2012.

Commercial Loans by Business Revenue & Loan Size

Assessment Area: Tampa

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2012				
		Bank		\$ (000s)		Total Businesses
		Count		\$	%	%
		#	%			
BUSINESS REVENUE	\$1million or Less	72	71.3%	\$20,242	68.7%	91.7%
	Over \$1 Million	22	21.8%	\$6,980	23.7%	5.0%
	<i>Total Rev. available</i>	94	93.1%	\$27,222	92.4%	96.7%
	Rev. Not Known	7	6.9%	\$2,222	7.5%	3.3%
	<i>Total</i>	101	100.0%	\$29,444	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	27	26.7%	\$1,320	4.5%	
	\$100,001 - \$250,000	35	34.7%	\$6,194	21.0%	
	\$250,001 - \$1 Million	39	38.6%	\$21,929	74.5%	
	<i>Total</i>	101	100.0%	\$29,444	100.0%	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	17	23.6%	\$827	4.1%	
	\$100,001 - \$250,000	30	41.7%	\$5,307	26.2%	
	\$250,001 - \$1 Million	25	34.7%	\$14,107	69.7%	
	<i>Total</i>	72	100.0%	\$20,242	100.0%	

Originations & Purchases

Based on 2012 D&B information .

The distribution of commercial loans by business revenue is reasonable. The bank originated 72 loans (71.3 percent of total loans) to businesses with revenues of \$1 million or less. While this level of lending is less than the 91.7 percent of total businesses of comparable revenue size, it is considered reasonable. Of the 72 loans to businesses with revenues of \$1 million or less, 47 (65.3 percent) were in amounts of \$250,000 or less. This loan

distribution is an indicator of the bank's willingness to provide the smaller loans that are often requested by small businesses.

Residential Real Estate (HMDA) Lending

The following table shows the distribution of Florida Bank's HMDA-reportable loans for 2012 by the income level of the borrowers. The tables also include a comparison of the bank's HMDA lending to the aggregate HMDA lenders within the assessment area.

Borrower Distribution of HMDA Loans

Assessment Area: Tampa

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2012					2012					
		Count		Bank Dollar		Families by Family Income	Count			Dollar		
		#	%	\$ (000s)	\$ %		%	Bank #	Bank %	Agg %	Bank \$ (000s)	Bank \$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	5.6%	\$0	0.0%	2.4%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	16.6%	\$0	0.0%	9.7%
	Middle	2	15.4%	\$109	3.5%	19.5%	2	15.4%	19.1%	\$109	3.5%	15.0%
	Upper	11	84.6%	\$3,037	96.5%	42.6%	11	84.6%	48.0%	\$3,037	96.5%	63.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.7%	\$0	0.0%	9.4%
	<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>\$3,146</i>	<i>100.0%</i>	<i>100.0%</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,146</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	4.5%	\$0	0.0%	2.6%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	9.7%	\$0	0.0%	6.0%
	Middle	2	20.0%	\$186	6.2%	19.5%	2	20.0%	15.3%	\$186	6.2%	11.2%
	Upper	7	70.0%	\$2,326	77.5%	42.6%	7	70.0%	53.6%	\$2,326	77.5%	62.3%
	Unknown	1	10.0%	\$490	16.3%	0.0%	1	10.0%	16.9%	\$490	16.3%	17.9%
	<i>Total</i>	<i>10</i>	<i>100.0%</i>	<i>\$3,002</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,002</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	11.7%	\$0	0.0%	2.4%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	18.7%	\$0	0.0%	8.1%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	19.5%	\$0	0.0%	14.4%
	Upper	1	100.0%	\$45	100.0%	42.6%	1	100.0%	46.9%	\$45	100.0%	68.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.2%	\$0	0.0%	6.2%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$45</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	20.1%	0	0.0%	5.1%	\$0	0.0%	2.4%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	12.6%	\$0	0.0%	7.3%
	Middle	4	16.7%	\$295	4.8%	19.5%	4	16.7%	16.9%	\$295	4.8%	12.3%
	Upper	19	79.2%	\$5,408	87.3%	42.6%	19	79.2%	51.2%	\$5,408	87.3%	60.7%
	Unknown	1	4.2%	\$490	7.9%	0.0%	1	4.2%	14.3%	\$490	7.9%	17.3%
	<i>Total</i>	<i>24</i>	<i>100.0%</i>	<i>\$6,193</i>	<i>100.0%</i>	<i>100.0%</i>	<i>24</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,193</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
Based on 2010 ACS Data.

The distribution of HMDA loans by borrower income level is very poor. The bank did not make any loans to low- or moderate-income borrowers, although demographic data indicates that 37.9 percent of families in the assessment area are low- or moderate-income. Aggregate lenders made 17.7 percent of their loans to low- or moderate-income borrowers.

COMMUNITY DEVELOPMENT TEST

The bank's community development performance is satisfactory. The bank demonstrates adequate responsiveness to the community development needs of the assessment area through a combination of community development loans, qualified investments, and community development services, considering the bank's capacity and constraints.

During the review period, Florida Bank made four loans totaling \$1.7 million in the Tampa assessment area, which included new originations, renewals, and participation loans. Three loans totaling \$1.1 million were for the purpose of affordable housing, and one loan for \$652,175 promoted economic development by financing a small business.

The bank had a \$500,000 current period community development investment in a nationwide fund that has community development as a primary purpose. The investment supports affordable housing for low- and moderate-income individuals inside the assessment area. The property benefiting from this investment has income restrictions that result in all units being affordable to low- and moderate-income individuals and families. Additionally, bank staff contributed three hours of qualified community development services by providing financial-related information and instruction targeted to a primarily low- and moderate-income audience in the assessment area.

METROPOLITAN AREA LIMITED-SCOPE REVIEWS

The following metropolitan assessment areas were reviewed using limited-scope examination procedures. Through the use of available facts and data, including performance and demographic information, each assessment area's performance was evaluated and compared with Florida Bank's performance in the full-scope assessment area. Please refer to the tables in Appendix B for demographic and lending data regarding these areas.

JACKSONVILLE ASSESSMENT AREA

Description of Institution's Operations in the Assessment Area

The assessment area consists of Duval and St. Johns Counties, which are two of the five counties that make up the Jacksonville, Florida MSA. The assessment area is made up of 214 census tracts: 17 (7.9 percent) are low-income, 55 (25.7 percent) are moderate-income, 80 (37.4 percent) are middle-income, 60 (28.0 percent) are upper-income, and two (0.9 percent) have unknown income levels. Of total families, 21.6 percent are low-income, 17.6 percent are moderate-income, 21.3 percent are middle-income, and 39.6 percent are upper-income. 2010 census data indicates the area population was approximately 1.1 million.

Florida Bank operates three offices and three ATMs in this assessment area, representing approximately 23 percent of the total branch network. The FDIC Deposit Market Share Report from June 30, 2013, shows 35 banks operating 255 offices in the assessment area, and with deposits of \$75.9 million, Florida Bank had 0.2 percent of the deposit market share, ranking 24th.

Conclusions with Respect to Performance Tests

The lending test included 12 commercial loans and four HMDA loans originated or renewed during the review period. Low lending volume can be attributed to the bank's limited presence and small market share in the assessment area. The bank's performance under both the lending test and the community development test was below the performance in the full-scope assessment area; however, it did not change the bank's overall rating.

SARASOTA ASSESSMENT AREA

Description of Institution's Operations in the Assessment Area

The assessment area consists of Manatee and Sarasota Counties, which make up the entire North Port-Bradenton-Sarasota, Florida MSA. The assessment area is made up of 172 census tracts: four (2.3 percent) are low-income, 42 (24.4 percent) are moderate-income, 78 (45.3 percent) are middle-income, and 48 (27.9 percent) are upper-income. Of total families, 19.6 percent are low-income, 19.0 percent are moderate-income, 20.9 percent are middle-income, and 40.5 percent are upper-income. 2010 census data indicates the area population was approximately 702,000.

Florida Bank operates one office and one ATM in this assessment area, representing approximately 8 percent of the total branch network. The FDIC Deposit Market Share Report from June 30, 2013, shows 43 banks operating 302 offices in the assessment area, and with deposits of \$16.8 million, Florida Bank had 0.1 percent of the deposit market share, ranking 39th.

Conclusions with Respect to Performance Tests

The lending test included two commercial loans and no HMDA loans originated or renewed during the review period. Low lending volume can be attributed to the bank's limited presence and small market share in the assessment area. The bank's performance under both the lending test and the community development test was below the performance in the full-scope assessment area; however, it did not change the bank's overall rating.

TALLAHASSEE ASSESSMENT AREA

Description of Institution’s Operations in the Assessment Area

The assessment area consists of Leon and Gadsden Counties, which are two of four counties that make up the Tallahassee, Florida MSA. The assessment area is made up of 77 census tracts: 12 (15.6 percent) are low-income, 23 (29.9 percent) are moderate-income, 20 (26.0 percent) are middle-income, 21 (27.3 percent) are upper-income, and one tract (1.3 percent) has an unknown income level. Of total families, 23.9 percent are low-income, 15.6 percent are moderate-income, 18.4 percent are middle-income, and 42.1 percent are upper-income. 2010 census data indicates the area population was approximately 322,000.

Florida Bank operates one office and one ATM in this assessment area, representing approximately 8 percent of the total branch network. Since the previous examination, the bank closed one office located in an upper-income tract. The FDIC Deposit Market Share Report from June 30, 2013, shows 17 banks operating 86 offices in the assessment area, and with deposits of \$43.3 million, Florida Bank had 0.9 percent of the deposit market share, ranking 16th.

Conclusions with Respect to Performance Tests

The lending test included 21 commercial loans and one HMDA loan originated or renewed during the review period. Low lending volume can be attributed to the bank’s limited presence and small market share in the assessment area. The bank’s lending performance was consistent with and community development performance was below the performance in the full-scope assessment area; however, it did not change the bank’s overall rating.

SUMMARY

The following table summarizes the conclusions regarding the bank’s performance in the limited-scope assessment areas compared to the full-scope assessment area.

Performance for Limited-Scope Review Metropolitan Assessment Areas		
Assessment Area	Lending Test	Community Development Test
Jacksonville	Below	Below
Sarasota	Below	Below
Tallahassee	Consistent	Below

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED			
Lending: January 1, 2012, through December 31, 2012			
Community development activities: August 1, 2011, through August 1, 2013			
FINANCIAL INSTITUTION		PRODUCTS REVIEWED	
Florida Bank, Tampa, Florida		Commercial Loans HMDA Loans	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
N/A	N/A	N/A	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Tampa-St. Petersburg-Clearwater, FL MSA Hillsborough County Pinellas County	Full-scope	North Tampa Branch 3001 Cove Bend Dr. Tampa, FL 33613	N/A
Jacksonville, FL MSA Duval County St. Johns County	Limited-scope	None	N/A
North Port-Bradenton-Sarasota, FL MSA Manatee County Sarasota County	Limited-scope	None	N/A
Tallahassee, FL MSA Leon County Gadsden County	Limited-scope	None	N/A

APPENDIX B – DEMOGRAPHIC/LOAN DISTRIBUTION TABLES

Combined Demographics Report

Assessment Area: Jacksonville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	17	7.9	13,392	5.2	4,572	34.1	55,408	21.6	
Moderate-income	55	25.7	54,752	21.3	8,755	16.0	45,050	17.6	
Middle-income	80	37.4	103,047	40.2	8,455	8.2	54,589	21.3	
Upper-income	60	28.0	85,306	33.3	2,825	3.3	101,450	39.6	
Unknown-income	2	0.9	0	0.0	0	0.0	0	0.0	
Total Assessment Area	214	100.0	256,497	100.0	24,607	9.6	256,497	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low-income	29,546	9,912	3.8	33.5	13,742	46.5	5,892	19.9	
Moderate-income	111,914	48,385	18.4	43.2	44,801	40.0	18,728	16.7	
Middle-income	184,754	107,540	41.0	58.2	50,452	27.3	26,762	14.5	
Upper-income	144,019	96,754	36.8	67.2	29,014	20.1	18,251	12.7	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	470,233	262,591	100.0	55.8	138,009	29.3	69,633	14.8	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#	%
Low-income	4,095	5.2	3,622	5.0	341	8.8	132	4.7	
Moderate-income	17,904	22.7	15,971	22.1	1,205	31.0	728	26.0	
Middle-income	29,943	38.0	27,553	38.2	1,311	33.7	1,079	38.5	
Upper-income	26,956	34.2	25,068	34.7	1,028	26.5	860	30.7	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	78,898	100.0	72,214	100.0	3,885	100.0	2,799	100.0	
Percentage of Total Businesses:				91.5		4.9		3.5	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#	%
Low-income	3	0.8	2	0.5	1	6.7	0	0.0	
Moderate-income	48	12.6	42	11.5	6	40.0	0	0.0	
Middle-income	179	47.1	176	48.2	3	20.0	0	0.0	
Upper-income	150	39.5	145	39.7	5	33.3	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	380	100.0	365	100.0	15	100.0	0	.0	
Percentage of Total Farms:				96.1		3.9		.0	

Based on 2012 D&B information according to 2010 ACS Boundaries.

APPENDIX B – DEMOGRAPHIC/LOAN DISTRIBUTION TABLES (Continued)

Geographic Distribution of Commercial Loans

Assessment Area: Jacksonville

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2012				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	5.0%
Moderate	5	41.7%	\$1,530	38.1%	22.1%
Middle	2	16.7%	\$305	7.6%	38.2%
Upper	5	41.7%	\$2,177	54.3%	34.7%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>\$4,012</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2012 D&B information according to 2010 ACS Boundaries.

Commercial Loans by Business Revenue & Loan Size

Assessment Area: Jacksonville

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2012				
		Count		Bank \$ (000s)		Total Businesses
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	8	66.7%	\$2,374	59.2%	91.5%
	Over \$1 Million	4	33.3%	\$1,638	40.8%	4.9%
	<i>Total Rev. available</i>	<i>12</i>	<i>100.0%</i>	<i>\$4,012</i>	<i>100.0%</i>	<i>96.4%</i>
	Rev. Not Known	0	0.0%	\$0	0.0%	3.5%
	<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>\$4,012</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	3	25.0%	\$254	6.3%	
	\$100,001 - \$250,000	4	33.3%	\$756	18.9%	
	\$250,001 - \$1 Million	5	41.7%	\$3,002	74.8%	
	<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>\$4,012</i>	<i>100.0%</i>	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	2	25.0%	\$200	8.4%	
	\$100,001 - \$250,000	3	37.5%	\$522	22.0%	
	\$250,001 - \$1 Million	3	37.5%	\$1,652	69.6%	
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$2,374</i>	<i>100.0%</i>	

Originations & Purchases

Based on 2012 D&B information .

APPENDIX B – DEMOGRAPHIC/LOAN DISTRIBUTION TABLES (Continued)

Geographic Distribution of HMDA Loans

Assessment Area: Jacksonville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012					Bank & Aggregate Lending Comparison 2012					
		Count		Bank Dollar		Owner Occupied Units %	Count			Dollar		
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %	
							%	%				
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	3.8%	0	0.0%	1.2%	\$0	0.0%	0.4%
	Moderate	0	0.0%	\$0	0.0%	18.4%	0	0.0%	10.4%	\$0	0.0%	5.7%
	Middle	0	0.0%	\$0	0.0%	41.0%	0	0.0%	42.6%	\$0	0.0%	35.7%
	Upper	1	100.0%	\$99	100.0%	36.8%	1	100.0%	45.8%	\$99	100.0%	58.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$99</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$99</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	3.8%	0	0.0%	0.9%	\$0	0.0%	0.5%
	Moderate	1	50.0%	\$80	42.6%	18.4%	1	50.0%	10.0%	\$80	42.6%	6.5%
	Middle	0	0.0%	\$0	0.0%	41.0%	0	0.0%	36.9%	\$0	0.0%	32.3%
	Upper	1	50.0%	\$108	57.4%	36.8%	1	50.0%	52.3%	\$108	57.4%	60.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$188</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$188</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.8%	0	0.0%	3.5%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	18.4%	0	0.0%	19.1%	\$0	0.0%	10.1%
	Middle	1	100.0%	\$40	100.0%	41.0%	1	100.0%	44.5%	\$40	100.0%	33.1%
	Upper	0	0.0%	\$0	0.0%	36.8%	0	0.0%	32.9%	\$0	0.0%	55.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$40</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$40</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY				Multi-Family Units								
	Low	0	0.0%	\$0	0.0%	6.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	32.1%	0	0.0%	23.1%	\$0	0.0%	19.2%
	Middle	0	0.0%	\$0	0.0%	35.1%	0	0.0%	51.9%	\$0	0.0%	54.7%
	Upper	0	0.0%	\$0	0.0%	26.5%	0	0.0%	25.0%	\$0	0.0%	26.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	3.8%	0	0.0%	1.1%	\$0	0.0%	0.4%
	Moderate	1	25.0%	\$80	24.5%	18.4%	1	25.0%	10.4%	\$80	24.5%	6.8%
	Middle	1	25.0%	\$40	12.2%	41.0%	1	25.0%	39.3%	\$40	12.2%	34.6%
	Upper	2	50.0%	\$207	63.3%	36.8%	2	50.0%	49.2%	\$207	63.3%	58.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$327</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$327</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
Based on 2010 ACS Data.

APPENDIX B – DEMOGRAPHIC/LOAN DISTRIBUTION TABLES (Continued)

Borrower Distribution of HMDA Loans

Assessment Area: Jacksonville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2012					2012					
		Count		Bank Dollar		Families by Family Income %	Count			Dollar		
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	9.4%	\$0	0.0%	4.2%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	21.1%	\$0	0.0%	14.7%
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	21.1%	\$0	0.0%	19.6%
	Upper	1	100.0%	\$99	100.0%	39.6%	1	100.0%	34.8%	\$99	100.0%	50.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.5%	\$0	0.0%	10.9%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$99</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$99</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	6.3%	\$0	0.0%	3.5%
	Moderate	1	50.0%	\$108	57.4%	17.6%	1	50.0%	12.8%	\$108	57.4%	8.7%
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	17.9%	\$0	0.0%	14.9%
	Upper	0	0.0%	\$0	0.0%	39.6%	0	0.0%	42.0%	\$0	0.0%	51.7%
	Unknown	1	50.0%	\$80	42.6%	0.0%	1	50.0%	21.0%	\$80	42.6%	21.2%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$188</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$188</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	16.4%	\$0	0.0%	6.7%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	21.6%	\$0	0.0%	11.7%
	Middle	1	100.0%	\$40	100.0%	21.3%	1	100.0%	24.9%	\$40	100.0%	17.3%
	Upper	0	0.0%	\$0	0.0%	39.6%	0	0.0%	33.6%	\$0	0.0%	57.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.5%	\$0	0.0%	6.6%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$40</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$40</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	7.7%	\$0	0.0%	3.6%
	Moderate	1	25.0%	\$108	33.0%	17.6%	1	25.0%	16.3%	\$108	33.0%	10.6%
	Middle	1	25.0%	\$40	12.2%	21.3%	1	25.0%	19.3%	\$40	12.2%	16.0%
	Upper	1	25.0%	\$99	30.3%	39.6%	1	25.0%	38.9%	\$99	30.3%	49.1%
	Unknown	1	25.0%	\$80	24.5%	0.0%	1	25.0%	17.7%	\$80	24.5%	20.6%
	<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$327</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$327</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
Based on 2010 ACS Data.

APPENDIX B – DEMOGRAPHIC/LOAN DISTRIBUTION TABLES (Continued)

Combined Demographics Report

Assessment Area: Sarasota

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	2.3	4,053	2.2	1,275	31.5	36,809	19.6
Moderate-income	42	24.4	38,939	20.7	5,818	14.9	35,850	19.0
Middle-income	78	45.3	90,137	47.9	5,461	6.1	39,390	20.9
Upper-income	48	27.9	55,100	29.3	1,927	3.5	76,180	40.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	172	100.0	188,229	100.0	14,481	7.7	188,229	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,714	2,871	1.3	37.2	3,716	48.2	1,127	14.6
Moderate-income	90,078	45,769	20.1	50.8	22,421	24.9	21,888	24.3
Middle-income	181,215	111,729	49.0	61.7	31,818	17.6	37,668	20.8
Upper-income	117,625	67,681	29.7	57.5	14,204	12.1	35,740	30.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	396,632	228,050	100.0	57.5	72,159	18.2	96,423	24.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,040	1.7	936	1.6	64	2.7	40	2.2
Moderate-income	12,568	20.3	11,457	19.9	680	28.5	431	24.1
Middle-income	27,237	44.0	25,669	44.5	823	34.5	745	41.6
Upper-income	21,027	34.0	19,635	34.0	816	34.2	576	32.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	61,872	100.0	57,697	100.0	2,383	100.0	1,792	100.0
Percentage of Total Businesses:			93.3		3.9		2.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.2	1	0.2	0	0.0	0	0.0
Moderate-income	69	12.1	64	11.9	5	14.7	0	0.0
Middle-income	246	43.1	229	42.6	17	50.0	0	0.0
Upper-income	255	44.7	243	45.3	12	35.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	571	100.0	537	100.0	34	100.0	0	.0
Percentage of Total Farms:			94.0		6.0		.0	

Based on 2012 D&B information according to 2010 ACS Boundaries.

APPENDIX B – DEMOGRAPHIC/LOAN DISTRIBUTION TABLES (Continued)

Geographic Distribution of Commercial Loans

Assessment Area: Sarasota

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2012				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	1.6%
Moderate	0	0.0%	\$0	0.0%	19.9%
Middle	1	50.0%	\$633	76.0%	44.5%
Upper	1	50.0%	\$200	24.0%	34.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$833</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2012 D&B information according to 2010 ACS Boundaries.

Commercial Loans by Business Revenue & Loan Size

Assessment Area: Sarasota

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2012				
		Count		Bank \$ (000s)		Total Businesses
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	2	100.0%	\$833	100.0%	93.3%
	Over \$1 Million	0	0.0%	\$0	0.0%	3.9%
	<i>Total Rev. available</i>	<i>2</i>	<i>100.0%</i>	<i>\$833</i>	<i>100.0%</i>	<i>97.2%</i>
	Rev. Not Known	0	0.0%	\$0	0.0%	2.9%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$833</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	0	0.0%	\$0	0.0%	
	\$100,001 - \$250,000	1	50.0%	\$200	24.0%	
	\$250,001 - \$1 Million	1	50.0%	\$633	76.0%	
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$833</i>	<i>100.0%</i>	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	\$0	0.0%	
	\$100,001 - \$250,000	1	50.0%	\$200	24.0%	
	\$250,001 - \$1 Million	1	50.0%	\$633	76.0%	
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$833</i>	<i>100.0%</i>	

Originations & Purchases

Based on 2012 D&B information .

APPENDIX B – DEMOGRAPHIC/LOAN DISTRIBUTION TABLES (Continued)

Geographic Distribution of HMDA Loans

Assessment Area: Sarasota

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012					Bank & Aggregate Lending Comparison 2012					
		Bank		Owner Occupied Units	Count		Dollar					
		Count	Dollar		Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	10.6%	\$0	0.0%	6.9%
	Middle	0	0.0%	\$0	0.0%	49.0%	0	0.0%	49.0%	\$0	0.0%	36.6%
	Upper	0	0.0%	\$0	0.0%	29.7%	0	0.0%	40.2%	\$0	0.0%	56.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	9.8%	\$0	0.0%	7.3%
	Middle	0	0.0%	\$0	0.0%	49.0%	0	0.0%	49.2%	\$0	0.0%	40.4%
	Upper	0	0.0%	\$0	0.0%	29.7%	0	0.0%	40.7%	\$0	0.0%	52.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	1.5%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	19.5%	\$0	0.0%	6.4%
	Middle	0	0.0%	\$0	0.0%	49.0%	0	0.0%	48.9%	\$0	0.0%	32.5%
	Upper	0	0.0%	\$0	0.0%	29.7%	0	0.0%	30.1%	\$0	0.0%	61.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY				Multi-Family Units								
	Low	0	0.0%	\$0	0.0%	2.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.6%	0	0.0%	30.8%	\$0	0.0%	23.3%
	Middle	0	0.0%	\$0	0.0%	38.7%	0	0.0%	50.0%	\$0	0.0%	48.6%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	19.2%	\$0	0.0%	28.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.3%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	20.1%	0	0.0%	10.3%	\$0	0.0%	7.5%
	Middle	0	0.0%	\$0	0.0%	49.0%	0	0.0%	49.1%	\$0	0.0%	39.1%
	Upper	0	0.0%	\$0	0.0%	29.7%	0	0.0%	40.3%	\$0	0.0%	53.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2010 ACS Data.

APPENDIX B – DEMOGRAPHIC/LOAN DISTRIBUTION TABLES (Continued)

Borrower Distribution of HMDA Loans

Assessment Area: Sarasota

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2012					2012					
		Count		Bank Dollar		Families by Family Income %	Count			Dollar		
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	19.6%	0	0.0%	5.7%	\$0	0.0%	2.4%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	15.3%	\$0	0.0%	9.2%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	18.2%	\$0	0.0%	14.1%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	50.6%	\$0	0.0%	65.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.3%	\$0	0.0%	8.9%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	19.6%	0	0.0%	6.1%	\$0	0.0%	3.5%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	12.2%	\$0	0.0%	7.8%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	19.2%	\$0	0.0%	14.7%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	50.8%	\$0	0.0%	62.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.7%	\$0	0.0%	11.6%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.6%	0	0.0%	10.8%	\$0	0.0%	2.3%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	24.9%	\$0	0.0%	8.6%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	22.1%	\$0	0.0%	15.1%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	38.3%	\$0	0.0%	67.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.9%	\$0	0.0%	7.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	19.6%	0	0.0%	6.0%	\$0	0.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	19.0%	0	0.0%	13.6%	\$0	0.0%	8.2%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	18.8%	\$0	0.0%	14.1%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	50.4%	\$0	0.0%	62.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	11.1%	\$0	0.0%	12.8%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
Based on 2010 ACS Data.

APPENDIX B – DEMOGRAPHIC/LOAN DISTRIBUTION TABLES (Continued)

Combined Demographics Report

Assessment Area: Tallahassee

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	15.6	5,847	8.2	2,312	39.5	17,011	23.9
Moderate-income	23	29.9	20,060	28.2	4,302	21.4	11,116	15.6
Middle-income	20	26.0	18,790	26.4	1,801	9.6	13,101	18.4
Upper-income	21	27.3	26,457	37.2	765	2.9	29,926	42.1
Unknown-income	1	1.3	0	0.0	0	0.0	0	0.0
Total Assessment Area	77	100.0	71,154	100.0	9,180	12.9	71,154	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	21,319	2,783	3.9	13.1	15,671	73.5	2,865	13.4
Moderate-income	43,695	18,395	25.5	42.1	19,150	43.8	6,150	14.1
Middle-income	36,438	21,353	29.6	58.6	10,781	29.6	4,304	11.8
Upper-income	40,297	29,608	41.0	73.5	7,876	19.5	2,813	7.0
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	141,749	72,139	100.0	50.9	53,478	37.7	16,132	11.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	1,669	7.1	1,474	6.8	90	8.6	105	13.4
Moderate-income	6,343	26.9	5,792	26.7	314	29.9	237	30.3
Middle-income	6,789	28.8	6,222	28.6	347	33.0	220	28.1
Upper-income	8,717	37.0	8,206	37.8	295	28.1	216	27.6
Unknown-income	41	0.2	32	0.1	4	0.4	5	0.6
Total Assessment Area	23,559	100.0	21,726	100.0	1,050	100.0	783	100.0
Percentage of Total Businesses:				92.2		4.5		3.3
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	4	1.5	4	1.5	0	0.0	0	0.0
Moderate-income	88	32.7	82	31.7	6	60.0	0	0.0
Middle-income	74	27.5	72	27.8	2	20.0	0	0.0
Upper-income	103	38.3	101	39.0	2	20.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	269	100.0	259	100.0	10	100.0	0	.0
Percentage of Total Farms:				96.3		3.7		.0

Based on 2012 D&B information according to 2010 ACS Boundaries.

APPENDIX B – DEMOGRAPHIC/LOAN DISTRIBUTION TABLES (Continued)

Geographic Distribution of Commercial Loans

Assessment Area: Tallahassee

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2012				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	1	4.8%	\$388	9.8%	6.8%
Moderate	6	28.6%	\$925	23.5%	26.7%
Middle	3	14.3%	\$818	20.8%	28.6%
Upper	11	52.4%	\$1,807	45.9%	37.8%
Unknown	0	0.0%	\$0	0.0%	0.1%
Tr Unknown	0	0.0%	\$0	0.0%	0.1%
<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>\$3,938</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

Based on 2012 D&B information according to 2010 ACS Boundaries.

Commercial Loans by Business Revenue & Loan Size

Assessment Area: Tallahassee

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2012				
		Count		Bank \$ (000s)		Total Businesses
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	15	71.4%	\$3,276	83.2%	92.2%
	Over \$1 Million	5	23.8%	\$651	16.5%	4.5%
	<i>Total Rev. available</i>	<i>20</i>	<i>95.2%</i>	<i>\$3,927</i>	<i>99.7%</i>	<i>96.7%</i>
	Rev. Not Known	1	4.8%	\$11	0.3%	3.3%
	<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>\$3,938</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	9	42.9%	\$524	13.3%	
	\$100,001 - \$250,000	5	23.8%	\$708	18.0%	
	\$250,001 - \$1 Million	7	33.3%	\$2,705	68.7%	
	<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>\$3,938</i>	<i>100.0%</i>	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	5	33.3%	\$276	8.4%	
	\$100,001 - \$250,000	4	26.7%	\$570	17.4%	
	\$250,001 - \$1 Million	6	40.0%	\$2,430	74.2%	
	<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>\$3,276</i>	<i>100.0%</i>	

Originations & Purchases

Based on 2012 D&B information .

APPENDIX B – DEMOGRAPHIC/LOAN DISTRIBUTION TABLES (Continued)

Geographic Distribution of HMDA Loans

Assessment Area: Tallahassee

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2012					Bank & Aggregate Lending Comparison 2012					
		Count		Bank Dollar		Owner Occupied Units %	Count			Dollar		
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	3.9%	0	0.0%	3.1%	\$0	0.0%	1.8%
	Moderate	0	0.0%	\$0	0.0%	25.5%	0	0.0%	17.3%	\$0	0.0%	11.1%
	Middle	0	0.0%	\$0	0.0%	29.6%	0	0.0%	28.3%	\$0	0.0%	21.7%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	51.3%	\$0	0.0%	65.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	3.9%	0	0.0%	2.9%	\$0	0.0%	1.8%
	Moderate	1	100.0%	\$35	100.0%	25.5%	1	100.0%	13.6%	\$35	100.0%	10.3%
	Middle	0	0.0%	\$0	0.0%	29.6%	0	0.0%	26.7%	\$0	0.0%	22.1%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	56.7%	\$0	0.0%	65.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$35</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$35</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	3.9%	0	0.0%	2.0%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	25.5%	0	0.0%	20.1%	\$0	0.0%	10.1%
	Middle	0	0.0%	\$0	0.0%	29.6%	0	0.0%	22.4%	\$0	0.0%	12.7%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	55.4%	\$0	0.0%	76.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	42.0%	0	0.0%	52.6%	\$0	0.0%	67.8%
	Moderate	0	0.0%	\$0	0.0%	27.8%	0	0.0%	15.8%	\$0	0.0%	2.7%
	Middle	0	0.0%	\$0	0.0%	14.4%	0	0.0%	26.3%	\$0	0.0%	16.9%
	Upper	0	0.0%	\$0	0.0%	15.8%	0	0.0%	5.3%	\$0	0.0%	12.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	3.9%	0	0.0%	3.0%	\$0	0.0%	4.5%
	Moderate	1	100.0%	\$35	100.0%	25.5%	1	100.0%	15.0%	\$35	100.0%	10.2%
	Middle	0	0.0%	\$0	0.0%	29.6%	0	0.0%	27.1%	\$0	0.0%	21.7%
	Upper	0	0.0%	\$0	0.0%	41.0%	0	0.0%	54.8%	\$0	0.0%	63.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$35</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$35</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
Based on 2010 ACS Data.

APPENDIX B – DEMOGRAPHIC/LOAN DISTRIBUTION TABLES (Continued)

Borrower Distribution of HMDA Loans

Assessment Area: Tallahassee

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2012					2012					
		Count		Bank Dollar		Families by Family Income	Count			Dollar		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	10.4%	\$0	0.0%	5.7%
	Moderate	0	0.0%	\$0	0.0%	15.6%	0	0.0%	20.8%	\$0	0.0%	15.9%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	20.7%	\$0	0.0%	20.5%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	37.2%	\$0	0.0%	49.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	10.9%	\$0	0.0%	8.8%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	5.4%	\$0	0.0%	3.2%
	Moderate	0	0.0%	\$0	0.0%	15.6%	0	0.0%	13.5%	\$0	0.0%	9.9%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	21.0%	\$0	0.0%	17.9%
	Upper	1	100.0%	\$35	100.0%	42.1%	1	100.0%	47.3%	\$35	100.0%	55.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.8%	\$0	0.0%	13.4%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$35</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$35</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	11.6%	\$0	0.0%	4.7%
	Moderate	0	0.0%	\$0	0.0%	15.6%	0	0.0%	22.1%	\$0	0.0%	13.5%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	24.5%	\$0	0.0%	22.8%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	39.8%	\$0	0.0%	57.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.0%	\$0	0.0%	1.3%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	23.9%	0	0.0%	7.2%	\$0	0.0%	3.8%
	Moderate	0	0.0%	\$0	0.0%	15.6%	0	0.0%	16.1%	\$0	0.0%	11.4%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	21.0%	\$0	0.0%	18.0%
	Upper	1	100.0%	\$35	100.0%	42.1%	1	100.0%	43.7%	\$35	100.0%	51.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.1%	\$0	0.0%	15.4%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$35</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$35</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
Based on 2010 ACS Data.

APPENDIX C – DEFINITIONS AND GENERAL INFORMATION

Definitions

ATM -	Automated Teller Machine
CDC -	Community Development Corporation
CDFI -	Community Development Financial Institution
CRA -	Community Reinvestment Act (Regulation BB)
FDIC -	Federal Deposit Insurance Corporation
FFIEC -	Federal Financial Institutions Examination Council
HMDA -	Home Mortgage Disclosure Act (Regulation C)
HUD -	Department of Housing and Urban Development
LMI -	Low- and Moderate-Income
LTD -	Loan-to-Deposit
LTV -	Loan-to-Value Ratio
MD -	Metropolitan Division
MSA -	Metropolitan Statistical Area
OMB -	Office of Management and Budget
REIS -	Regional Economic Information System
SBA -	Small Business Administration
USDA -	United States Department of Agriculture

Rounding Convention

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

APPENDIX C – DEFINITIONS AND GENERAL INFORMATION (Continued)

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 Florida Bank prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of October 28, 2013. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX D – 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 multi-family 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 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.

Effective January 19, 2010, the Board of Governors of the Federal Reserve System, the Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation revised the definition of community development to include loans, investments, and services by financial institutions that-

- I. Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
- II. Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; and
- III. Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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.

APPENDIX D – GLOSSARY (Continued)

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 and Community Development 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).

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 applicants, 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 multi-family (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings 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 and Community Development 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. An 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. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an 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.

APPENDIX D – GLOSSARY (Continued)

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

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

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

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

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

Rated area: A rated area is a state or 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 120 percent or more of the area median income, or a median family income that is 120 percent or more, in the case of a geography.