



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Seacoast National Bank
Charter Number: 14838

815 Colorado Avenue
Stuart, FL 34995-9012

Office of the Comptroller of the Currency

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

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Overall CRA Rating

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

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

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory			
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support this rating include:

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

Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Description of Institution

Seacoast National Bank (SNB) is a publicly traded intrastate community bank headquartered in Stuart, Florida. SNB is a wholly owned subsidiary of Seacoast Banking Corporation of Florida, a one-bank holding company also headquartered in Stuart. The bank has seven subsidiaries; five operating subsidiaries and two statutory subsidiaries. The operating subsidiaries include FNB Brokerage Services, Inc., FNB RE Services, Inc. and its wholly-owned subsidiary FNB Property Holdings, Inc., South Branch Building, Inc., which owns one of the bank's branch locations, and T Coast Holdings, LLC which owns and operates certain properties acquired through foreclosure. The statutory subsidiaries include FNB Insurance Services, Inc., which has never had any activity and BR West LLC, which was formed to hold foreclosed real estate but currently has no activity or assets. The operation of these subsidiaries does not affect the bank's ability to lend or invest in its community.

As of June 30, 2009, SNB reported total assets of \$2.1 billion and total deposits of \$1.8 billion. Tier 1 Capital totaled \$184 million. While the bank offers a full range of loan products, as outlined in its CRA Public File, the bank's primary business focus is real estate lending, particularly residential real estate. The loan portfolio, which totaled \$1.6 billion, represented 76 percent of total assets. The loan portfolio consists of residential mortgage loans (38 percent), commercial real estate loans (33 percent), construction and land development loans (19 percent), consumer loans (4 percent), commercial and industrial loans (3 percent) and other loans (3 percent). The bank regularly sells the residential real estate loans it originates on the secondary market. It does not purchase any HMDA or small loans to businesses. The bank is not now profitable, having last reported a profit in the first quarter of 2008.

SNB currently operates 41 branch offices in 14 counties in Central and South Florida. There are 24 branches on the "Treasure Coast" which includes Martin, St. Lucie, and Indian River Counties; the bank's primary market area. Branches are also located in Brevard, Broward, Desoto, Glades, Hardee, Hendry, Highlands, Okeechobee, Orange, Palm Beach and Seminole Counties. The majority of these counties were added to the bank's market as a result of the acquisition of Big Lake National Bank (headquartered in Okeechobee, Florida) in June 2006 and Century National Bank (headquartered in Orlando, Florida) in August 2006. This is the first CRA examination in which the lending activity in the newer counties is included in the evaluation.

There are no legal, financial, or other factors impeding SNB's ability to help meet the credit needs in its assessment areas. At its last CRA examination dated October 10, 2006 the bank was rated "Outstanding".

Scope of the Evaluation

Evaluation Period/Products Evaluated

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

With the exception of community development loans, the evaluation period for the Lending Test is January 1, 2006 through June 30, 2009. For community development loans, the Investment Test, and the Service Test, the evaluation period is October 10, 2006, the date of the last CRA evaluation, through August 31, 2009.

The most current market share information available at the time of this examination for HMDA loans is 2007 and it is used in the Core Tables. Because it is not current information, less consideration is given to market share performance for HMDA loans in reaching conclusions. The most current market share information available for small loans to businesses is 2008 and that data is used in the Core Tables.

Data Integrity

This evaluation is based on accurate data. We relied upon management's internal reviews and our sampling as to the accuracy of the HMDA data. We reviewed the accuracy of small loans to business reported under the CRA and determined that there were errors. Management corrected the errors and verified the accuracy of those corrections. The corrected data was used at this examination.

Community development loans, investments, and services submitted by management were verified to ensure that they met the regulatory definition of community development. Some items submitted for consideration were excluded from this evaluation because they did not meet the definition or purpose of community development.

Selection of Areas for Full-Scope Review

The bank has seven assessment areas including all of MSA 38940 (Port St. Lucie-Ft. Pierce, FL) which consists of Martin and St. Lucie Counties, all of MSA 42680 (Sebastian-Vero Beach, FL) which consists of all of Indian River County, all of Metropolitan Division (MD) 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) which consists of all of Palm Beach County, all of MSA 37340 (Palm Bay-Melbourne-Titusville, FL), which consists of all of Brevard County, all of MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL) which consists of all of Broward County, part of MSA 36740 (Orlando-Kissimmee, FL) consisting of only Orange and Seminole Counties, and the contiguous non-MSA counties of Desoto, Glades, Hardee, Hendry, Highlands, and Okeechobee. MSA 38940 and the non-MSA assessment areas were selected for a full-scope review. Combined, they represent 69 percent of the bank's deposits

as of June 30, 2008 and 72 percent of loans reported for this examination. The remaining five assessment areas received a limited-scope review.

Refer to Appendix A for additional information regarding full- and limited-scope reviews.

Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews. The most weight was given to performance in the MSA 38940 (Port St. Lucie-Fort Pierce, FL) assessment area because it alone represents 57 percent of the bank's deposits as of June 30, 2008 and 53 percent of loans reported for this examination while the non-MSA assessment area represents 12 percent of deposits and 19 percent of loans reported for this examination.

Based on loan volumes, HMDA loan performance was more heavily weighted than performance related to small loans to businesses. Of the two, HMDA loans represent 69 percent of loans analyzed at this examination. Within HMDA loans, home purchase loans received the most weight because they represent 46 percent of all HMDA loans analyzed. Home improvement and refinance loans were given equal weight.

Also, because of the limited number of low - and moderate -income geographies (3 and 19 respectively) in the full-scope assessment areas, more weight was given to the distribution of loans by income level of the borrower segment of the Lending Test than distribution of loans by income level of the geography.

Other

Community credit needs in the assessment area were determined by reviewing recent housing and demographic information as well as the plan for the Fort Pierce Enterprise Zone, the various Community Redevelopment Areas (CRA) within MSA 38940, and the Martin and St. Lucie County plans for HUD's Neighborhood Stabilization Plan (NFP) funds. In addition, for this examination we conducted two community contacts, one in each full-scope assessment area. Both contacts were with local non-profit affordable housing organizations.

Presently, the most critical needs identified were those associated with providing affordable housing, job opportunities, and community services directed to the unemployed and homeless. The latter two needs being directly associated with the current state of the local economies in the assessment areas. The NFP plans documented the need to stabilize areas by addressing the foreclosure problems prevalent in both assessment areas. Both community contacts noted the need for funding to better enable them to obtain, rehabilitate, and make available foreclosed properties to area low- and moderate-income families.

For additional information, see the Market Profile in Appendix B.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "Outstanding", when considering the bank's community development loan performance. Based on a full-scope review, the bank's performance in the Port St. Lucie-Ft. Pierce MSA full-scope assessment area is excellent, when considering the bank's strong community development loan performance. Based on a full-scope review, the bank's performance in the Non MSA full-scope assessment area is good, when considering the bank's strong community development loan performance.

Lending Activity

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

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

In addition to the responsiveness provided by the level of the bank's HMDA loans and small loans to businesses discussed below, the bank responded to pressing needs in its assessment areas by initiating a loan modification program to prevent foreclosure with the objective of providing affordable, sustainable, loan modifications for homeowners who are facing foreclosure on their primary residence. Since implementing the program in the last quarter of 2008, the bank modified 82 loans secured by the borrower's primary residence. Of these loans, 56 percent were to low- or moderate-income borrowers. Loan modifications are not reportable under the HMDA and are therefore not included in the analysis that follows.

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

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

Home mortgage lending activity is good, when the bank's deposit market share and rank is compared with its HMDA loan market share and rank when considering performance context. The bank's market share and rank of HMDA loan originations and purchases in the Port St. Lucie-Ft. Pierce assessment area was significantly lower than its deposit market share and rank. However, the bank's performance was negatively impacted by multiple performance context factors including the fact that the bank does not purchase any HMDA loans, the large

number of non-deposit taking HMDA lenders in the assessment area, many of whom offer a far greater variety of mortgage products than SNB, and local economic conditions that have caused a marked decline in home purchases and refinances. Combined, these factors make it very difficult for the bank to have comparable deposit and HMDA loan performance and, considering these factors, the bank's performance is good.

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

SNB's deposit market share in the Port St. Lucie-Ft. Pierce MSA assessment area was 13.34 percent and the bank was ranked third, according to FDIC data as of June 30, 2007. The bank's market share of all HMDA loan originations and purchases was 1.95 percent and it was ranked 14th of 630 lenders reporting HMDA loans in the assessment area, based on 2007 aggregate data. However, when only local financial institutions that are not nation-wide, large regional, or mortgage company lenders are considered, the bank would be ranked second. Leading lenders include Countrywide Home Loans, Countrywide Bank, FSB, and Bank of America with market shares of 9.34 percent, 6.14 percent, and 6.13 percent, respectively. When only loan originations and local financial institutions that are not nation-wide, large regional, or mortgage company lenders are considered, SNB was ranked first for home purchase and home improvement loans, and second for refinance loans.

Competition for mortgage loans is very strong in the assessment area. As noted above, there are a very large number of lenders reporting loan originations and purchases under the HMDA, many of them among the largest mortgage lenders in the United States. Most are mortgage companies and financial institutions that do not take deposits in the assessment area. In 2007, there were 21 financial institutions reporting deposits in the Port St. Lucie-Ft. Pierce assessment area and 630 lenders reporting HMDA activity.

Small business lending activity is considered good, when the bank's deposit market share and rank is compared with its market share and rank of small loans to businesses and consideration is given to the fact that SNB is primarily a residential real estate lender. The bank's market share of small loans to businesses is somewhat lower than its deposit market share but its rank for small loans to businesses exceeds its deposit ranking in the assessment area, considering the dollar amount of loans.

FDIC data as of June 30, 2008, shows that SNB had a deposit market share of 13.66 percent and it was ranked fourth among 20 financial institutions reporting deposits in the assessment area. Using 2008 aggregate data, SNB's market share of small loans to businesses was 8.06 percent, based on the dollar amount of loans and the bank was ranked third of 82 lenders reporting small loans to businesses in the assessment area. The comparison is based on the dollar volume of loans rather than the number of loans because of the inclusion of credit card lenders in the reporting. Credit card lenders originate a large number of loans, but the dollar volume is significantly smaller. For example, the top seven reporters of small loans to businesses in 2008 are credit card lenders that do not take deposits in the assessment area. Combined, these seven lenders have a market share of 84 percent based on the number of loans, but only 33 percent based on dollar volume. On an individual basis, the largest originator of small loans to businesses, by number, is American Express Bank, FSB with a 31.19 percent market share. Because of this situation, a comparison based on dollar volume of lending is more reflective of the bank's performance.

Non-MSA Counties

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

Home mortgage lending activity is considered good, when the bank's deposit market share and rank is compared with its HMDA loan market share and rank when consideration is given to performance context. The bank's market share of HMDA loan originations in the Non-MSA assessment area was somewhat lower than its deposit market share and its rank for HMDA loan originations exceeded its deposit market share ranking. The bank's lending activity performance is impacted by the same performance context factors discussed above, making it very difficult for the bank to have comparable deposit and HMDA loan performance. Considering these factors, the bank's performance is good.

SNB's deposit market share in the overall Non-MSA assessment area was 7.04 percent and the bank was ranked sixth, according to FDIC data as of June 30, 2007. The bank's market share of all HMDA loan originations and purchases was 3.30 percent and it was ranked eighth of 445 lenders reporting HMDA activity in the assessment area, based on 2007 aggregate data. However, when only local financial institutions that are not nation-wide, large regional, or mortgage company lenders are considered, the bank would be ranked first. Leading lenders include Countrywide Home Loans and Bank of America with market shares of 11.13 percent and 7.04 percent, respectively. When only loan originations and local financial institutions that are not nation-wide, large regional, or mortgage company lender are considered, SNB was ranked first for home purchase and home improvement loans, and second for refinance loans.

Competition for mortgage loans is strong in the assessment area. As noted above, there are a very large number of lenders reporting loans under the HMDA, many of them among the largest mortgage lenders in the United States. Most are mortgage companies and financial institutions that do not take deposits in the assessment area. In 2007, there were 17 financial institutions reporting deposits in the overall Non-MSA assessment area and 445 lenders reporting HMDA loans.

Small business lending activity is excellent, when the bank's deposit market share and rank is compared with its market share and rank of small loans to businesses and considering that SNB is primarily a residential real estate lender. The bank's market share of small loans to businesses is near to its deposit market share and its rank for small loans to businesses exceeds its deposit ranking in the assessment area, considering the dollar amount of loans.

FDIC data as of June 30, 2008, shows that SNB had a deposit market share of 7.26 percent and it was ranked sixth among 17 financial institutions reporting deposits in the assessment area. Using 2008 aggregate data, SNB's market share of small loans to businesses was 6.82 percent, based on the dollar amount of loans and the bank was ranked fifth of 50 lenders reporting small loans to businesses in the assessment area. The comparison is based on the dollar volume of loans rather than the number of loans because of the inclusion of credit card lenders in the reporting of small loans to businesses. Credit card lenders originate a large

number of loans, but the dollar volume is significantly smaller. For example, the top seven reporters of small loans to businesses in 2008 are credit card lenders that do not take deposits in the assessment area. Combined, these seven lenders have a market share of 81 percent based on the number of loans, but only 27 percent based on dollar volume. On an individual basis, the largest originator of small loans to businesses, by number, is American Express Bank, FSB with a 19.83 percent market share. Because of this situation, a comparison based on dollar volume of lending is more reflective of the bank's performance.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

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

Conclusions regarding home mortgage loans are based on performance in moderate-income geographies. In the Port St. Lucie-Ft. Pierce assessment area there is very limited opportunity to lend in the three low-income geographies within the assessment area. According to the 2000 Census there are only 1,200 owner-occupied housing units located in the three low-income geographies and competition for home mortgage lending is very strong, as noted in the Lending Activity discussion.

There are no low-income geographies in the Non-MSA assessment area and only six moderate-income geographies. These moderate-income geographies, the majority of which are concentrated in Highlands County, offer somewhat limited opportunities for home mortgage lending as they contain only 6,600 owner-occupied housing units, according to the 2000 Census. Even though the Non-MSA full-scope assessment area is rural in nature, there is still a good level of competition for home mortgage loans, including from several of the largest banks in the country, which operate branch offices in the assessment area.

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

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

home purchase and home improvement loans is adequate and the geographic distribution of refinance loans is poor, given performance context.

The overall geographic distribution of home purchase loans is adequate, given performance context. In low-income geographies, the bank's percentage of home purchase loans is lower than the percentage of owner-occupied housing units in such geographies. In moderate-income geographies, the percentage of the bank's home purchase loans is somewhat lower than the percentage of owner-occupied housing units in such geographies. The bank's market share of loans in low-income geographies is somewhat lower than its overall market share of home purchase loans and in moderate-income geographies the bank's market share is near to its overall market share of home purchase loans.

The overall geographic distribution of home improvement loans is adequate, given performance context. In low-income geographies, the bank's percentage of home improvement loans is lower than the percentage of owner-occupied housing units in such geographies. In moderate-income geographies, the percentage of the bank's home improvement loans is somewhat lower than the percentage of owner-occupied housing units in such geographies. Also, the bank's market share of home improvement loans in low-income geographies is significantly lower than its overall market share of home improvement loans and in moderate-income geographies its market share of home improvement loans exceeds its overall market share of home improvement loans.

The overall geographic distribution of refinance loans is poor, given performance context. The bank did not originate any refinance loans in low-income geographies. In moderate-income geographies, the percentage of the bank's refinance loans is lower than the percentage of owner-occupied housing units in such geographies. Also, in moderate-income geographies the bank's market share of refinance loans is lower than its overall market share of refinance loans.

Non-MSA Counties

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

The overall geographic distribution of home purchase loans is adequate, given performance context. In moderate-income geographies, the percentage of the bank's home purchase loans is lower than the percentage of owner-occupied housing units in such geographies. Although such performance would generally be considered poor, given performance context it is considered adequate. Also, the bank's market share of home purchase loans in moderate-income geographies is significantly lower than to its overall market share of home purchase loans.

The overall geographic distribution of home improvement loans is poor, given performance context. In moderate-income geographies, the percentage of the bank's home improvement loans is significantly lower than the percentage of owner-occupied housing units in such geographies. The bank's market share of home improvement loans in moderate-income geographies is significantly lower than its overall market share of home improvement loans.

Although such performance would generally be considered very poor, given performance context it is considered poor.

The overall geographic distribution of refinance loans is poor, given performance context. In moderate-income geographies, the percentage of the bank's refinance loans is significantly lower than the percentage of owner-occupied housing units in such geographies. The bank's market share of refinance loans in moderate-income geographies is also significantly lower than its overall market share of refinance loans. Although such performance would generally be considered very poor, given performance context it is considered poor.

Small Loans to Businesses

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

Conclusions are based on performance in moderate-income geographies. Opportunities for lending to businesses in the three low-income geographies of the Port St. Lucie-Ft. Pierce assessment area are limited. Only 1,400 businesses are located there (based on current CRA Wiz data), and competition for such loans is strong both between banks operating in the area and credit card lenders, as noted in the discussion of Lending Activity.

There are no low-income geographies in the non-MSA full-scope assessment area. As in the Port St. Lucie-Ft. Pierce assessment area, opportunities are somewhat limited because there are only 2,600 businesses located in the six moderate-income geographies (based on current CRA Wiz data) in the overall Non-MSA assessment area, most of which are concentrated in Highlands County. Competition is also strong in this small assessment area including banks and credit card lenders, as noted in the discussion of Lending Activity.

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

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

The percentage of small loans to businesses in low-income geographies is poor, however the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of small loans to businesses. In moderate-income geographies the percentage of small loans to businesses significantly exceeds the percentage of businesses located in moderate-income geographies and the bank's market share of small loans to businesses in moderate-income geographies exceeds its overall market share of small loans to businesses.

Non-MSA Counties

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

In moderate-income geographies the percentage of small loans to businesses is significantly lower than the percentage of businesses located in moderate-income geographies, but given performance context this performance is only considered poor. Also, the bank's market share

of small loans to businesses in moderate-income geographies is lower than its overall market share of small loans to businesses.

Lending Gap Analysis

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

Inside/Outside Ratio

A significant majority of the SNB's loans are within its overall assessment area. Overall, 99 percent by number and 97 percent by dollar of SNB's loans are within its assessment area. By loan product, 99 percent by number and 96 percent by dollar of HMDA loans and 99 percent by number and 98 percent by dollar of small loans to businesses are inside the bank's assessment area. This performance had a positive impact on the bank's overall geographic distribution analysis.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

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

Conclusions are primarily based on lending to moderate-income borrowers. Beginning in 2003, housing prices began to climb in the full-scope Port St. Lucie-Ft. Pierce assessment area, reaching a peak in July 2006 when the median price of an existing single-family home reached \$265,300, based on data from the Florida Association of Realtors. The HUD adjusted median income level in 2006 was \$54,600, making it extremely difficult for low-income families, who would earn at most \$27,294 to purchase a home. Even moderate-income families found it difficult without substantial subsidies or direct loans from government agencies active in the assessment area. However, the availability of such resources became very limited during the period of high housing prices. Since July 2006 housing prices declined substantially as the area moved into recession. But, related high unemployment rates, a poverty rate of 10 percent, and a reduction in the availability of special mortgage loan products that assist low-

and moderate-income borrowers continue to limit the ability of low-income families to become homeowners during the latter part of the evaluation period.

A similar situation exists in the Non-MSA full-scope assessment area. Housing prices peaked in mid-2006 when the median value of an existing single-family home was estimated to be approximately \$170,000. The HUD adjusted median income level in 2006 was \$44,100, making it extremely difficult for low-income families, who would earn at most \$44,100 to purchase a home. Even some moderate-income families found it difficult without substantial subsidies or direct loans from government agencies active in the assessment area. However, the availability of such resources became very limited during this period of high housing prices. Since 2006 housing prices declined substantially as the area moved into recession with current asking prices of existing single family homes within the assessment area ranging as low as \$65,000 to \$73,000. But, related high unemployment rates (averaging 13 percent among the counties), a poverty rate ranging from 16.4 percent to 21.4 percent, and a reduction in the availability of special mortgage loan products that assist low-income borrowers continue to limit the ability of low-income families to become homeowners during the latter part of the evaluation period.

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

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

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

The overall borrower distribution of home purchase loans is adequate, given performance context. The percentage of home purchase loans to low-income borrowers is lower than the percent of low-income families in the assessment area. However, the bank's market share of home purchase loans to low-income borrowers significantly exceeds its overall market share of home purchase loans. The percent of home purchase loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families in the assessment area and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall market share of home purchase loans.

The overall borrower distribution of home improvement loans is excellent, given performance context. The percent of the bank's home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families in the assessment area. The bank's market share of home improvement loans to low-income borrowers exceeds its overall market share of home improvement loans. In moderate-income geographies, the percentage of the bank's home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families in the assessment area and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall market share of home improvement loans.

The overall borrower distribution of refinance loans is excellent, given performance context. The percentage of the bank's refinance loans to low-income borrowers is lower than the percentage of low-income families in the assessment area, given performance context. And,

the bank's market share of refinance loans to low-income borrowers exceeds its overall market share of refinance loans. The percent of refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the assessment area. The bank's market share of refinance loans to moderate-income borrowers also exceeds its overall market share of refinance loans.

Non-MSA Counties

Overall, the geographic distribution of home mortgage loans in the Non-MSA Counties is excellent. The geographic distribution of both home purchase and refinance loans is excellent and the geographic distribution of home improvement loans is adequate, given performance context.

The overall borrower distribution of home purchase loans is excellent, given performance context. The percentage of home purchase loans to low-income borrowers is lower than the percent of low-income families in the assessment area. However, the bank's market share of home purchase loans to low-income borrowers exceeds its overall market share of home purchase loans. The percent of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families in the assessment area and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall market share of home purchase loans.

The overall borrower distribution of home improvement loans is adequate, given performance context. The percent of the bank's home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families in the assessment area. The bank's market share of home improvement loans to low-income borrowers exceeds its overall market share of home improvement loans. In moderate-income geographies, the percentage of the bank's home improvement loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families in the assessment area and the bank's market share of home improvement loans to moderate-income borrowers is near to its overall market share of home improvement loans.

The overall borrower distribution of refinance loans is excellent, given performance context. The percentage of the bank's refinance loans to low-income borrowers is somewhat lower than the percentage of low-income families in the assessment area, given performance context. And, the bank's market share of refinance loans to low-income borrowers exceeds its overall market share of refinance loans. The percent of refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families in the assessment area. The bank's market share of refinance loans to moderate-income borrowers exceeds its overall market share of refinance loans.

Small Loans to Businesses

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

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

The borrower distribution of small loans to businesses is good considering the percent of loans to small businesses and the size of the bank’s loans. The percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) is somewhat lower than the percentage of such businesses in the assessment area. The bank’s market share of loans to small businesses exceeds its market share of loans to all businesses. In addition, 67 percent of the bank’s small loans to businesses are for amounts of \$100,000 or less, indicating such loans are meeting the needs of smaller businesses.

Non-MSA Counties

The borrower distribution of small loans to businesses is good considering the percent of loans to small businesses and the size of the bank’s loans. The percentage of small loans to small businesses (businesses with gross annual revenues of \$1 million or less) is somewhat lower than the percentage of such businesses in the assessment area. The bank’s market share of loans to small businesses exceeds its market share of loans to all businesses. Also, 68 percent of the bank’s small loans to businesses are for amounts of \$100,000 or less, indicating such loans are meeting the needs of smaller businesses.

Community Development Lending

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

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

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

In the Port St. Lucie-Ft. Pierce assessment area, SNB originated 27 community development loans totaling \$19 million during the evaluation period. The following table illustrates the bank’s responsiveness to assessment area needs.

**Community Development Lending
Port St. Lucie-Ft. Pierce Full-Scope Assessment Area**

Purpose	Number (% of total)	\$000s (% of total)
Community Service	17 (63%)	\$ 15,040 (78%)
Affordable Housing	7 (26%)	\$ 3,010 (16%)
Revitalize and Stabilize	3 (11%)	\$ 1,300 (6%)
Totals	27 (100%)	\$ 19,350 (100%)

The majority of SNB’s community development loans were directed toward community service needs. While most of the loans (based on number) were renewals of lines of credit to non-profit organizations supplying community services primarily to low- and moderate-income individuals and families, the largest loan (a new \$10 million loan representing 67 percent of total community service loans) is to St. Lucie County. With the proceeds the county purchased and redesigned a large vacant retail facility located in a moderate-income geography so that it could better assist in providing community services to the residents of nearby low- and moderate-income geographies. A portion of the space is being used by the county for storage and archives management, providing new jobs. The remaining space, for example, is being used by a non-profit health care provider opening a new free primary care clinic for uninsured low-income residents, a need which has grown as a result of the high unemployment rate in the county. In addition, the county is partnering with several trade unions to initiate an apprenticeship/job training program targeted to low- and moderate-income individuals. Graduates will be used as part of the county’s affordable housing program for rehabilitation/renovation work and new construction under the county’s Neighborhood Stabilization Program (NSP) plan, thus providing additional job opportunities.

Affordable housing loans will help to meet a long-standing need in the assessment area. Multiple loans to Habitat for Humanity assisted the organization in its primary mission of building housing affordable to low- and moderate-income families and one specific loan helped Habitat to construct a group of homes in Indiantown affordable to very low-income homebuyers. Another loan renewal for \$1.3 million to a non-profit housing organization also in Indiantown helped the organization to construct 42 single-family homes targeted for purchase by low- and moderate-income families.

Revitalization and stabilization loans were to three different condominium associations for building repairs resulting from a series of hurricanes that previously impacted the area. Of the three associations, one is located in a moderate-income geography and contained 24 units. The remaining 1,215 units are located in middle-income geographies.

Non-MSA Counties

In the Non-MSA assessment area, SNB originated six community development loans totaling \$2.8 million during the evaluation period. The following table illustrates the bank’s responsiveness to assessment area needs.

**Community Development Lending
Non-MSA Full-Scope Assessment Area**

Purpose	Number (% of total)	\$000s (% of total)
Revitalize and Stabilize	4 (67%)	\$ 2,700 (97%)
Community Service	2 (33%)	\$ 80 (3%)
Totals	6 (100%)	\$ 2,780 (100%)

Two revitalize and stabilize loans assisted DeSoto County whose operations are located in a non-metropolitan middle-income geography that is designated as a “distressed area” by the agencies because of high levels of poverty. The \$1 million loan was renewed twice during the evaluation period to assist the county in maintaining and rebuilding its facilities as a result of hurricane damage. Two other revitalize and stabilize loans assisted the town of Zolfo Springs

(Hardee County) to repair and expand its waste water treatment center in order to support commercial development. The town is located in a middle-income geography that has been designated as a “distressed area” by the agencies because of high levels of poverty.

Community service loans are to two different agencies that primarily provide services to low- and moderate-income persons and families. One non-profit organization provides shelter and outreach services to victims of domestic violence and the other provides health services.

Product Innovation and Flexibility

Overall, product innovation and flexibility had a positive impact on the Lending Test. Product innovation and flexibility had a positive impact on the Lending Test in both the full-scope Port St. Lucie-Ft. Pierce and Non-MSA assessment areas. SNB’s products provided home mortgage loan opportunities for a good number of low- and moderate-income borrowers who might not have otherwise had the opportunity.

The bank offered several home mortgage loan products during the evaluation period, as described below. The loans noted here were included in the geographic distribution and borrower distribution analysis already discussed.

Affordable Home Buyer’s Program (47 loans; \$4.4 million)

This flexible proprietary mortgage product was initiated by the bank in 1996. Borrowers require less personal savings for down payment and closing costs, and less income to qualify for a mortgage than under conventional mortgage guidelines. Credit histories can be developed from non-traditional sources such as rent receipts, utility payments and telephone bills. Borrowers can obtain a mortgage loan with a 95% loan-to-value ratio, which does not require private mortgage insurance. The product is limited to borrowers whose income does not exceed 100 percent of the HUD Median Family Income for the county or MSA but the volume of loans noted above include only those borrowers whose income did not exceed 80 percent of the HUD Median Family Income for the county or MSA.

Of the loans, 27 were originated in the Port St. Lucie-Ft. Pierce full-scope assessment area totaling \$2.4 million. The remaining 15 loans totaling \$1.3 million were originated in the Non-MSA full-scope assessment area.

State Housing Initiative Partnership Loans (9 loans; \$761,000 million)

Flexible State Housing Initiative Partnership (SHIP) loans are offered through SNB’s partnership with local lending consortiums. The funds provide down payment and closing cost assistance. The underwriting of SHIP loans allows for expanded expense ratios, and non-traditional credit histories are accepted. A maximum 90% loan-to value-ratio is acceptable without private mortgage insurance. In conjunction with these loans, the bank frequently uses zero interest second mortgage loans under the HOME Program administered by the Florida Housing Finance Corporation or the Guarantee Housing Loan Program offered by the United States Department of Agriculture (USDA) Rural Development in order to qualify the borrower. The product has the same borrower income restrictions as noted for the Affordable Homebuyers Program but the volume of loans noted above include only those borrowers

whose income did not exceed 80 percent of the HUD median family income for the county or MSA.

Of the nine loans, four totaling \$294,000 were originated in the Port St. Lucie-Ft. Pierce full-scope assessment area and two loans totaling \$222,000 were originated in the Non-MSA full-scope assessment area.

Special Home Improvement Home Equity Loan Program (117 loans; \$2.6 million)

Created in 2000, this product is targeted to low- and moderate-income individuals and families with incomes that do not exceed 80 percent of the HUD median family income for the county or MSA and reside in a low- or moderate-income geography. The loan is priced below current rates and the borrower incurs no loan fees.

Of the 117 loans, 68 totaling \$1.7 million were originated in the Port St. Lucie-Ft. Pierce full-scope assessment area and 18 totaling \$435,000 were originated in the Non-MSA full-scope assessment area.

Federal Housing Administration (FHA) Loans (24 loans; \$3.5 million)

In January 2009 the bank began to offer FHA mortgage loans, including the 203K purchase/rehabilitation product throughout its assessment areas. The product allows for a flexible source of funds for down payment and/or closing costs, expanded ratios, non-traditional credit history, and seller contributions. SNB now uses this product to replace its proprietary Affordable Home Buyer product which was no longer saleable on the secondary market allowing it to continue offering a mortgage product that would assist low- and moderate-income homebuyers. Of the 24 loans, 18 loans totaling \$2.8 million were originated in the full-scope Port St. Lucie-Ft. Pierce assessment area. No FHA loans were originated in the Non-MSA full-scope assessment area during the evaluation period.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in all the limited-scope assessment areas is weaker than the bank's overall "Outstanding" performance under the Lending Test. The weaker performance did not impact the bank's rating under the Lending Test, given the level of retail deposits in each of the areas. Refer to Tables 1 through 12 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "Low Satisfactory", considering the positive impact in two limited-scope assessment areas, a state-wide investment, limited opportunities available to the bank, and performance context. Based on a full-scope review, the bank's performance in the Port St. Lucie-Ft. Pierce assessment area is adequate considering the impact of the assessment area investment and given performance context.

Based on a full-scope review, performance in the Non-MSA assessment area is poor, even when consideration is given to performance context.

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

Overall, the bank's community development investments are responsive to assessment area needs, addressing primarily community service and affordable housing needs. Investments are not considered innovative or complex. Private investors routinely provide these types of qualified investments. Opportunities exist in the full-scope assessment area for the bank to make qualified investments however they are limited, particularly in light of current economic conditions and the bank's overall financial condition. For a discussion of investment opportunities, see the Market Profile in Appendix B.

During prior and current evaluation periods, SNB made a statewide investment in an investment fund organized and managed by a certified Community Development Entity (CDE). The fund acquires and renovates shopping centers in the State of Florida that are located in low- and moderate-income geographies, helping to revitalize and stabilize those areas. The funds activities are benefiting portions of the bank's assessment areas.

Late in the current evaluation period the bank invested in a mortgage-backed security, for which the collateral is a pool of 14 mortgage loans to low- and moderate-income borrowers. The properties securing the mortgages are located throughout the bank's assessment areas. Therefore this investment is presented in Table 14 under the caption "Overall Assessment Area". In addition to the mortgage-backed security, some donations that benefit the bank's overall assessment area were also included under this caption. The impact of these investments is taken into consideration when reaching conclusions about performance in each of the assessment areas.

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

The bank's performance in the full-scope Port St. Lucie-Ft. Pierce assessment area is adequate considering the impact of the assessment area investment and given performance context and the financial condition of the bank.

Current Period Investments: SNB's direct current period investments in the full-scope Port St. Lucie-Ft. Pierce assessment area consist entirely of grants and donations totaling \$274 thousand. Most important is a donation of a foreclosed home to Habitat for Humanity of Martin County, the value of which is included in the total. Habitat will complete the home and make it available to a low- or moderate-income family. SNB is the first bank to donate a foreclosed home to this Habitat organization. Affordable housing needs are considered the most important in the assessment area and this donation is highly responsive to those needs as well as helping to address the issue of foreclosed homes. Approximately 20 percent of grants and donations are to organizations that support affordable housing efforts. The remainder is directed toward community service needs which have expanded in light of current economic conditions in the assessment area.

Prior Period Investments: One investment, with a current book value of \$996,000, remains on the books of the bank. This prior period investment represents 78 percent of total

investments in the assessment area. The investment is in a Ft. Pierce Capital Improvement Revenue Bond, the proceeds of which are being used for capital improvements in the City's Empowerment Zone. The investment continues to have a positive impact on the community helping to provide revitalization and stabilization to the low- and moderate-income geographies that comprise the Enterprise Zone which was designated by the State of Florida.

Non-MSA Counties

Performance in the Non-MSA assessment area is poor, even when consideration is given to performance context factors.

Current Period Investments: Current period investments in the Non-MSA full-scope assessment area consist of 31 donations and grants totaling \$46,000. Approximately 11 percent of donations and grants are to organizations whose primary purpose is to assist in revitalizing and stabilizing the multiple geographies in the overall assessment that are categorized as economically distressed middle-income geographies. The remainder is directed to organizations that provide community services, a need that has grown with the decline in economic conditions in the assessment area as evidenced by an average unemployment rate in the counties of 13 percent.

There are no prior period investments in the full-scope Non-MSA assessment area.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) and the MSA 37340 (Melbourne-Titusville-Palm Bay, FL) assessment areas was stronger than the bank's overall "Low Satisfactory" rating and it had a positive impact on the overall rating. Performance in the other limited-scope assessment areas was weaker than the bank's overall low satisfactory performance. The weaker performance did not impact the bank's rating under the Investment Test, given the level of retail deposits in each of the areas. This performance had a neutral impact on the overall Investment Test rating. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

SERVICE TEST

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

Retail Banking Services

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

Office hours and services in both full-scope assessment areas are comparable among locations regardless of the income level of the geography. Branch locations, which are discussed below, are augmented by a variety of alternative delivery systems including ATMs, telephone banking, and online banking with bill pay. All branch offices with the exception of one Martin County branch in an upper-income geography provide ATMs. There is no data as to the impact of telephone and online banking on low- and moderate-income persons therefore no significant weight was given to these systems.

A wide range of banking products and services are offered throughout both full-scope assessment areas, as described in the bank's Public File. Of particular note are the free personal and business checking accounts offered by the bank that require no minimum balance and have no monthly maintenance fee. In the full-scope Port St. Lucie-Ft. Pierce assessment area the bank has approximately 20,000 free personal checking accounts and 2,500 free business checking accounts. In the Non-MSA assessment area, there are approximately 8,000 free personal checking accounts and 500 free business checking accounts.

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

Branches are readily accessible in the full-scope Port St. Lucie-Ft. Pierce assessment area. There are no branches located in low-income geographies however only 3.6 percent of the 319,000 persons residing in the assessment area (based on the 2000 Census) live in the three low-income geographies in the assessment area. The percent of branches in moderate-income geographies is near to the percent of population residing in moderate-income geographies. However, when consideration is given to two branches in middle-income geographies that were originally located in moderate-income geographies, the bank provides excellent accessibility to residents of the moderate-income geographies in the full-scope Port St. Lucie-Ft. Pierce assessment area.

Prior to the 2003 Office of Management and Budget (OMB) changes in census tract (geographies) designations, the Cove Road and Wedgewood branches were actually in moderate-income geographies. Although the branches did not move, it appears that the line designating tract boundaries was moved to the opposite side of the road, and the branch tract designation was changed. These two branches continue to serve the same moderate-income community they did in the past.

Alternatively, the bank provides an off-site ATM facility located at the Martin County Courthouse. The Courthouse is in a moderate-income geography.

Branch openings/closings did not negatively affect the overall accessibility of delivery systems in the full-scope assessment area. During the evaluation period, there was one branch closing in a low-income geography. It was the result of the bank losing its lease within the retail

facility where it was housed. The branch operation was relocated to a separate facility approximately one mile away in a moderate-income geography. This had a neutral impact on branch distribution.

Non-MSA Counties

Branches are reasonably accessible in the full-scope Non-MSA assessment area. There are no low-income geographies in the Non-MSA assessment area. There are six moderate-income geographies but no SNB branches are located there. About 12 percent of the 229,000 persons residing in the assessment area (based on 2000 Census) live in those moderate-income geographies. All branches are located in middle-income geographies where 88 percent of the population resides. The bank's branches are located on major roadways, generally within retail business districts.

No branches were opened or closed in the Non-MSA assessment area. This had a neutral impact on the retail portion of the Service Test.

Community Development Services

Considering the level of participation and the number of organizations and individuals benefiting, the overall level of community development services is excellent, with the bank taking a leadership role and providing some complex services. Although the services are not innovative, they are responsive to stated assessment area needs.

Community development services are excellent in the full-scope Port St. Lucie-Ft. Pierce assessment area and good in the Non-MSA full-scope assessment area.

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

During the evaluation period, the bank participated in 16 homeownership workshops attended by approximately 375 persons. The seminars were held in conjunction with the Martin County or St. Lucie County Lending Consortiums and the Consumer Credit Counseling Service, which primarily serves low- and moderate-income people. These regularly scheduled, six hour, multi-lingual courses cover the pre-home buying process including the mortgage application process, realtor relations, insurance needs, credit and budgeting, appraisals and inspections, and available subsidy programs. An SNB officer has assumed a leadership role in scheduling and organizing all the workshops conducted by the two Consortiums (75 attended by 1,690 persons) by serving as Chairperson and Treasurer of both the Martin County and St. Lucie County Lending Consortiums. Six different SNB officers volunteered as instructors for the bank's programs.

Also, bank officers and employees regularly use their financial expertise to provide technical assistance to organizations that provide community development services in the bank's full-scope assessment area by serving on the board of directors, advisory councils, budget and allocation committees, or fundraising committees. In all, 58 different officers and employees used their financial expertise to provide technical assistance to 28 different organizations during the evaluation period. For example, three different officers have served on the Board of Directors of the Martin County Habitat for Humanity or provided financial literacy training to prospective homeowners during the evaluation period. Also, three employees have engaged

in fundraising activities for Main Street Ft. Pierce, an organization that is working to revitalize and stabilize the city's main street area, all of which is located in a low-income geography.

Of particular note is the complex technical assistance, considering the bank's size, provided by a SNB officer related to the application for and monitoring of direct subsidies under the Affordable Housing Program (AHP) of the Federal Home Loan Bank of Atlanta (FHLBA). During the evaluation period, the officer wrote five applications for AHP grants for two different non-profit affordable-housing organizations. Four grants were approved and two are funded. In addition to monitoring the funded grants, another previously funded grant continues to be monitored. Regarding the other applications, one is pending and two, although approved, were withdrawn because of current economic conditions. For SNB, participation in the AHP is complex, requiring considerable administrative time on the part of the sponsoring bank because it must write, administer, and disburse the funds as well as monitor the project and provide documentation to the FHLBA.

One funded grant is on behalf of the Martin County Habitat for Humanity in the amount of \$500,000 to subsidize infrastructure costs for homes on land that was acquired using Hurricane Housing Rehabilitation Funds in the Booker Park neighborhood of Indiantown. Fifty-eight new single-family homes, that are available to low- or moderate-income buyers, are being constructed in the Indiantown moderate-income geography.

Also, the bank applied for a grant on behalf of Indiantown Non-Profit Housing, Inc. so the organization could assist 50 homeowners repair, mitigate, and retrofit their homes from the past and help protect them from future disasters. To qualify, homeowners must be low- or moderate-income. Thirty home owners have been assisted with \$330,000 of the grant funded and the bank continues to administer the funds. A modification and extension of the grant was submitted during the evaluation period and the remaining 20 units are in process.

Non-MSA Counties

Bank officers and employees regularly use their financial expertise to provide technical assistance to organizations that provide community development services in the bank's Non-MSA full-scope assessment area by serving on the board of directors, advisory councils, budget and allocation committees, or fundraising committees. In all, 13 different officers and employees used their financial expertise to provide technical assistance to 19 different organizations during the evaluation period. For example, one officer assists Highland County SHIP by reviewing applicant qualifications and another uses her financial expertise to regularly assist the Affordable Housing Advisory Committee in Highlands County.

In addition, SNB is increasing access to financial services in the full-scope Non-MSA assessment area by maintaining four branches that help to revitalize and stabilize distressed non-metropolitan middle-income geographies. Branches in Arcadia, Clewiston, Labelle and Wauchula are all located in middle-income geographies that have been designated as distressed by the regulatory agencies.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the MSA 36740 (Seminole and Orange Counties, FL only) assessment area was not inconsistent with

the bank's overall "outstanding" performance under the Service Test. The bank's performance under the Service Test in the other limited-scope assessment areas is weaker than the bank's overall performance. There are no branches in low- or moderate-income geographies in these assessment areas. Performance in the limited-scope assessment areas had a neutral impact on the overall Service Test conclusion. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): (01/01/06 to 06/30/09) Investment and Service Tests and CD Loans: (10/10/06 to 08/31/09)	
Financial Institution	Products Reviewed	
Seacoast National Bank Stuart, FL	HMDA, Small Business, and community development loans. Flexible and innovative products.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
MSA 38940 (Port St. Lucie-Ft. Pierce, FL)	Full-Scope	
Non-MSA Counties	Full-Scope	
MSA 42680 (Sebastian-Vero Beach, FL)	Limited-Scope	
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	Limited-Scope	
	Limited-Scope	
MSA 37340 (Palm Bay-Melbourne-Titusville, FL)	Limited-Scope	
MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL)	Limited-Scope	
MSA 36740 (Orlando-Kissimmee, FL)-Orange and Seminole Counties only	Limited-Scope	

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Appendix B: Market Profiles for Full-Scope Areas

SNB has two full-scope assessment areas. The first includes all MSA 38940 (Port St. Lucie-Ft. Pierce, FL), which is comprised of Martin and St. Lucie Counties. The second includes a group of six contiguous non-MSA counties with similar economic characteristics. Both assessment areas, as well as the limited-scope assessment areas, meet the requirements of the CRA regulation and do not arbitrarily exclude low- and moderate-income geographies.

The following provides detailed demographic information about the full-scope assessment areas.

MSA 38940

Demographic Information for Full Scope Area: MSA 38940 (Port St. Lucie-Ft. Pierce, FL)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	60	5.00	21.67	51.67	21.67	0.00
Population by Geography	319,426	3.58	17.57	57.55	21.31	0.00
Owner-Occupied Housing by Geography	104,166	1.15	11.40	62.21	25.24	0.00
Business by Geography	56,120	2.57	19.41	56.13	21.90	0.00
Farms by Geography	1,472	2.17	21.20	55.50	21.13	0.00
Family Distribution by Income Level	90,803	18.46	19.34	22.19	40.01	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	34,324	6.15	21.35	58.97	13.52	0.00
Median Family Income HUD Adjusted Median Family Income for 2009 Households Below Poverty Level (2007)		45,503 59,600 10%	Median Housing Value Unemployment Rate (July, 2009)		97,335 13.00%	

(*) The NA category consists of geographies that have not been assigned an income classification. **Source:** 2000 US Census and 2009 HUD updated MFI.

Unemployment rate is average of the two counties.

SNB's Port St. Lucie-Ft. Pierce assessment area consists of the entire MSA, which includes Martin County (where SNB is headquartered) and adjacent St. Lucie County to the north. St. Lucie is the larger of the two counties, with 60 percent of the total MSA population. All of the low-income (3) and 69 percent of the moderate-income (9) geographies in the MSA are located in St. Lucie County, primarily in Ft. Pierce. The city of Ft. Pierce has a population of approximately 38,000. Of that population, 31% live below the poverty level.

Overall, owner occupancy levels are high in the assessment area, reaching 79 percent in Martin County and 76 percent in St. Lucie County, primarily as a result of the housing boom in the area through 2006. However, the area has been severely impacted by the current housing crisis. The state of Florida consistently ranks among the top five states in the nation for the

number of home foreclosures, ranking second in June 2009. At the same time, St. Lucie County ranked 11th among the state's 67 counties and Martin County 13th in the level of Florida foreclosures, according to Realty Trac.

Housing prices have declined in the MSA more than 40 percent since they peaked in June 2006. The Florida Association of Realtors estimates the median sales price of an existing single-family home in July 2009 to be \$159,300, almost the same level it was in 2003. When these prices are compared with the MSA's HUD Adjusted Median Family Income of \$59,600 it is clear that with the assistance of subsidies and other special programs low- or moderate-income families may have an opportunity to purchase a home; however, current economic conditions have reduced the availability of assistance.

Local economic conditions are weak. Prior to the National Bureau of economic Research declaring the United States officially in a recession, local economists indicated the economy of Florida was in recession earlier, due to the large decline in real estate values (over 30 percent). In the MSA, housing starts have declined to the lowest levels in a decade according to Metro Study Corporation. During the second quarter of 2009 there were 12 single-family housing starts in Martin County subdivisions (60 new construction starts overall) and 14 (112 new construction starts overall) in St. Lucie County, representing a decline of 96 percent for the 2006 peak. The decline in jobs, particularly construction and construction-related jobs has driven unemployment rates to levels that exceed that of the state and the nation. As of July 2009, the unemployment rate in Martin County was 11.3 percent and in St. Lucie County 14.7 percent. This indicates a need for activities that support job creation, job placement and job training programs, and community services for low- and moderate-income persons and families.

The housing and economic crisis has combined to reduce mortgage lending in the assessment area, however 2008 saw a slight decline in the inventory of new homes indicating that mortgage lending may have increased somewhat. Home Mortgage Disclosure Act (HMDA) data shows that between 2006 and 2007 (the most recent year for which data is now available), conventional home purchase loan originations in the MSA declined 56 percent. Refinance loans declined at a lesser rate of approximately 35 percent. However, the number of mortgage lenders reporting HMDA originations in the MSA remains high (630). Conversely, the number of small loans to businesses reported under the CRA increased slightly between 2006 and 2007; approximately 1 percent. But significant declines were noted between 2007 and 2008 when there was a decline of 37 percent in small loans to businesses reported in the MSA.

Competition for financial services is strong in the MSA. There are 20 different financial institutions operating 138 branches in the MSA (as of June 30, 2008), including national, regional, and community banks and savings and loan associations. In addition, mortgage companies and credit card lenders compete for loans in the assessment area. Their numbers far exceed the number of financial institutions operating in the assessment area.

There is a limited range of opportunities for community development lending, investments, and services throughout the MSA and larger institutions are quite competitive for the qualified investments that are available. Community development opportunities include providing technical assistance and financing to the several organizations whose mission is to provide affordable housing. However, the impact of the mortgage crisis has caused affordable housing

organizations to change their focus from new construction to the acquisition, rehabilitation, and re-sale of previously foreclosed homes to low- and moderate-income families. Some of this activity can be funded through grants from the Neighborhood Stabilization Program (NSP) offered by the Department of Housing and Urban Development (HUD). Both counties in the MSA received NSP funding. Community development loan opportunities exist for bridge financing to help meet these needs as well as those of community development service organizations. Also, there is a state designated Enterprise Zone in Ft. Pierce that targets economic development with the goal of stimulating and retaining jobs and there are multiple Community Redevelopment Areas in the MSA that are targeted for revitalization, where there is an opportunity for community development lending.

Community development investments options have also become limited. Mortgage-backed securities are an option but they have become expensive. Low Income Housing Tax credits remain available but they are generally complex for community banks and their viability depends on the financial condition of the bank. There are state and regional community development financial institutions (CDFI's) and private equity organizations which need support for their community development activities. Opportunities exist to contribute to qualified non-profit organizations whose mission meets the definition of community development, particularly in the areas of job training and job placement as evidenced by the high unemployment rates in the MSA. However, the extent of these activities has been impacted by the financial condition of the banks.

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

There is a designated Enterprise Zone in Ft. Pierce that targets economic development with the goal of stimulating and retaining jobs and there are multiple Community Redevelopment Areas in the MSA that are targeted for revitalization. Types of community development investments available in the MSA include, but are not limited to, the purchase of mortgage-backed and SBA loan-backed securities, participation in state-wide or regional investment funds, the purchase of municipal bonds whose purpose meets the definition of community development, and opportunities to contribute to qualified non-profit organizations whose missions are focused on providing affordable housing, community services for low- and moderate-income persons, and economic development.

Non-MSA Counties

Demographic Information for Full Scope Area: Non-MSA Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	41	0.00	14.63	82.93	2.44	0.00
Population by Geography	229,209	0.00	12.18	87.76	0.06	0.00
Owner-Occupied Housing by Geography	64,311	0.00	10.32	89.66	0.02	0.00
Business by Geography	22,358	0.00	11.68	88.32	0.00	0.00
Farms by Geography	1,941	0.00	7.16	92.84	0.00	0.00
Family Distribution by Income Level	60,476	20.04	19.97	23.23	36.76	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	24,199	0.00	15.58	84.36	0.06	0.00
Median Family Income HUD Adjusted Median Family Income for 2009 Households Below Poverty Level (2007)		36,211 46,700 19%	Median Housing Value Unemployment Rate (July, 2009)		59,710 13%	

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

Source: 2000 US Census, 2009 HUD updated MFI, 2009 updated S&P business data. Poverty level and unemployment rates are an average for the six counties in the Non-MSA assessment area.

SNB’s Non-MSA assessment area consists of six south central Florida counties including DeSoto, Glades, Hardee, Hendry, Highlands, and Okeechobee. These counties are contiguous and generally adjacent to the bank’s coastal Treasure Coast market. The combined population of the assessment area is estimated (2008) to be 254,000 ranging from a high of 100,000 in Highlands County to a low of 11,000 in Glades County. The counties are primarily (83 percent) middle-income. There are no low-income geographies in the assessment area and only six moderate-income geographies, located in Highlands County (4), DeSoto (1), and Hardee (1) Counties. One geography in Hendry County is upper-income.

The assessment area is generally rural in nature relying on the retail, health care, public administration and construction sectors as well as citrus farming and cattle ranching for a large portion of job opportunities. Job opportunities in the construction and retail industries declined significantly as the economy slowed and the area’s unemployment rate currently exceeds that of the state. As of July 2009, Florida’s unemployment rate was 10.7 percent, but the average unemployment rate among the six Non-MSA counties was 13 percent ranging from a low of 10.6 percent in Glades County to a high of 16.4 percent in Hendry County.

Income levels in the assessment area have historically been low. The HUD adjusted median family income for all non-MSA counties in Florida is \$46,700, but in the assessment area Non-MSA counties the median family income ranges from \$33,000 to \$35,000. Poverty levels are high with an average rate in 2007 of 19 percent, ranging from a low of 16.4 percent in Okeechobee and Glades Counties to a high of 24 percent in Hardee County. Most of the counties are consistently on the list of economically distressed middle-income geographies

maintained by the regulatory agencies. Also, the state of Florida has established Enterprise Zones in all six counties in an effort to attract businesses and jobs.

As in other portions of Florida, the population grew since the 2000 Census and housing prices did the same although to a far lesser extent than other portions of the bank's assessment area. Prices peaked in mid-2006. Exact home values and prices are not readily available for rural areas such as the bank's Non-MSA assessment area, but it is estimated that at the peak of the market median values were approximately \$170,000. Currently, asking prices for homes listed for sale in the various counties begin at an average of \$65,000. Most listings are for foreclosed properties. Income levels in the assessment area were never sufficient enough for most low- and moderate-income families to purchase a home without some form of assistance and although current prices are more affordable, the high unemployment and poverty rates in the assessment area limit the number of families with the ability to purchase a home.

The housing and economic crisis has combined to reduce mortgage lending in the Non-MSA assessment area. Home Mortgage Disclosure Act (HMDA) data shows that between 2006 and 2007 (the most recent year for which data is now available), conventional home purchase loan originations for all lenders in the Non-MSA assessment area declined 49 percent. Refinance loans declined at a lesser rate of approximately 21 percent. However, the number of mortgage lenders reporting HMDA originations in the MSA remains high (445) for the size of the market. Conversely, the number of small loans to businesses reported under the CRA increased between 2006 and 2007 by approximately 6 percent. But, significant declines were noted between 2007 and 2008 when there was a decline of 34 percent in small loans to businesses reported in the Non-MSA assessment area by all lenders.

Although a rural market, competition for financial services is strong in the non-MSA markets. There are 17 financial institutions operating branches in the non-MSA counties, including national, regional, and community banks. In addition, mortgage companies and credit card lenders compete for loans in the assessment area. Their numbers far exceed the number of financial institutions operating in the assessment area.

There is a limited range of opportunities for community development lending, investments, and services in the non-MSA assessment area. Community development opportunities include working with and providing financing to the few organizations whose mission is to provide affordable housing as well as the many organizations that help to supply community services for low- and moderate-income persons, a need that has grown during this period of economic decline. There are designated state Enterprise Zones in each of the counties that target economic development with the goal of stimulating and retaining jobs, but attracting large businesses to these areas is difficult. Types of community development investments available in the MSA include, but are not limited to, participation in state-wide or regional investment funds and opportunities to contribute to qualified non-profit organizations whose missions are focused on providing affordable housing or community services for low- and moderate-income persons and families.

Appendix C: Tables of Performance Data

Content of Standardized Tables

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

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

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

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

Market share information is presented based on the most recent aggregate market data available.

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

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

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

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

Table 1. Lending Volume

LENDING VOLUME		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2006 TO JUNE 30, 2009						
MA/Assessment Area (2009):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
MSA 38940 (Port St L Pie)	53.01	1,806	257,275	718	100,554	3	1,200	27	19,350	2,527	359,029	57.07
Non-MSA C	18.56	621	63,151	232	29,864	35	2,908	6	2,780	888	95,923	12.24
Limited Review:												
MD - 22744 (Ft Laud Pompano Beach-Deerfield)	0.56	11	6,149	16	5,522	0	0	0	0	27	11,671	1.46
MSA 36740 Partial (Semir Orange Count	3.65	12	3,454	163	32,702	0	0	1	1,845	175	36,156	12.87
MSA 37340 (Pa Melbourne-Titusv	3.03	129	17,772	17	4,621	0	0	0	0	146	22,393	0.70
MSA 42680 (Sebasti Bea	14.88	508	91,102	189	22,644	12	654	8	24,968	709	114,400	11.28
MD 48424 (West Palm Boca Raton-Boyton Bea	6.31	172	62,029	128	28,458	4	445	0	0	304	90,932	4.37

* Loan Data as of June 30, 2009. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from October 10, 2006 to August 31, 2009.

*** Deposit Data as of June 30, 2009. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2006 TO JUNE 30, 2009							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 38940 (Port St Lucie-Ft. Pierce, FL)	786	53.04	1.15	0.38	11.40	7.76	62.21	68.32	25.24	23.54	1.55	1.32	1.52	1.43	2.19
Non-MSA Counties	279	18.83	0.00	0.00	10.32	3.58	89.66	96.42	0.02	0.00	3.51	0.00	0.44	3.76	0.00
Limited Review:															
MD 22744 (Ft. Lauderdale-Pompano Beach-Deerfield Beach, FL)	8	0.54	1.16	0.00	23.67	0.00	45.93	37.50	29.24	62.50	0.00	0.00	0.00	0.01	0.00
MSA 36740 Partial (Seminole and Orange Counties, FL)	4	0.27	0.86	0.00	14.02	0.00	43.19	0.00	41.93	100.00	0.00	0.00	0.00	0.00	0.01
MSA 37340 (Palm Bay-Melbourne-Titusville, FL)	102	6.88	0.62	0.00	17.75	77.45	49.76	14.71	31.87	7.84	0.22	0.00	1.63	0.03	0.05
MSA 42680 (Sebastian-Vero Beach, FL)	211	14.24	0.00	0.00	13.47	7.58	61.60	70.62	24.93	21.80	1.47	0.00	1.78	1.52	1.15
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	92	6.21	1.53	0.00	24.63	9.78	36.35	42.39	37.50	47.83	0.08	0.00	0.06	0.09	0.09

* Based on 2007 Peer Mortgage Data (Eastern)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT			Geography: FLORIDA						Evaluation Period: JANUARY 1, 2006 TO JUNE 30, 2009						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
MSA 38940 (Port St Lucie-Ft. Pierce, FL)	511	59.49	1.15	0.39	11.40	6.46	62.21	69.28	25.24	23.87	12.62	0.00	13.11	12.35	15.05
Non-MSA Counties	173	20.14	0.00	0.00	10.32	1.73	89.66	98.27	0.02	0.00	13.52	0.00	0.00	14.72	0.00
Limited Review:															
MD 22744 (Ft. Lauderdale-Pompano Beach-Deerfield Beach, FL)	2	0.23	1.16	0.00	23.67	100.00	45.93	0.00	29.24	0.00	0.00	0.00	0.00	0.00	0.00
MSA 36740 Partial (Seminole and Orange Counties, FL)	4	0.47	0.86	0.00	14.02	0.00	43.19	50.00	41.93	50.00	0.02	0.00	0.00	0.00	0.05
MSA 37340 (Palm Bay-Melbourne- Titusville, FL)	5	0.58	0.62	0.00	17.75	100.00	49.76	0.00	31.87	0.00	0.06	0.00	0.45	0.00	0.00
MSA 42680 (Sebastian-Vero Beach, FL)	139	16.18	0.00	0.00	13.47	7.91	61.60	76.26	24.93	15.83	11.42	0.00	8.11	11.58	12.70
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	25	2.91	1.53	0.00	24.63	4.00	36.35	40.00	37.50	56.00	0.26	0.00	0.13	0.18	0.46

* Based on 2007 Peer Mortgage Data (Eastern)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE 2009		Geography: FLORIDA								Evaluation Period: JANUARY 1, 2006 TO JUNE 30,					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa II	Low	Mod	Mid	Upp
Full Review:															
MSA 38940 (Port St Lucie-Ft. Pierce, FL)	502	55.41	1.15	0.00	11.40	4.38	62.21	65.34	25.24	30.28	1.24	0.00	0.47	1.22	1.78
Non-MSA Counties	169	18.65	0.00	0.00	10.32	1.78	89.66	98.22	0.02	0.00	1.84	0.00	0.00	2.02	0.00
Limited Review:															
MSD 22744 (Ft. Lauderdale-Pompano Beach-Deerfield Beach, FL)	1	0.11	1.16	0.00	23.67	0.00	45.93	100.00	29.24	0.00	0.00	0.00	0.00	0.00	0.00
MSA 36740 Partial (Seminole and Orange Counties, FL)	4	0.44	0.86	0.00	14.02	25.00	43.19	25.00	41.93	50.00	0.00	0.00	0.01	0.00	0.01
MSA 37340 (Palm Bay-Melbourne- Titusville, FL)	22	2.43	0.62	0.00	17.75	72.73	49.76	13.64	31.87	13.64	0.04	0.00	0.27	0.01	0.00
MSA 42680 (Sebastian-Vero Beach, FL)	154	17.00	0.00	0.00	13.47	8.44	61.60	70.78	24.93	20.78	1.39	0.00	1.78	1.41	1.15
MD 48424 (West Palm Beach-Boca Raton- Boynton Beach, FL)	54	5.96	1.53	3.70	24.63	12.96	36.35	20.37	37.50	62.96	0.03	0.12	0.01	0.02	0.05

* Based on 2007 Peer Mortgage Data (Eastern)

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

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

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2006 TO JUNE 30, 2009					Market Share (%) by Geography				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overa II	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
MSA 38940 (Port St Lucie-Ft. Pierce, FL)	7	58.33	2.19	0.00	14.37	14.29	43.56	28.57	39.88	57.14	5.00	0.00	0.00	0.00	50.00	
Non-MSA Counties	0	0.00	0.00	0.00	12.76	0.00	87.09	0.00	0.15	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL)	0	0.00	2.27	0.00	32.48	0.00	48.64	0.00	16.61	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 36740 Partial (Seminole and Orange Counties, FL)	0	0.00	2.73	0.00	27.37	0.00	50.42	0.00	19.47	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 37340 (Palm Bay-Melbourne- Titusville, FL)	0	0.00	2.10	0.00	26.13	0.00	53.00	0.00	18.77	0.00	0.00	0.00	0.00	0.00	0.00	
MSA 42680 (Sebastian-Vero Beach, FL)	4	33.33	0.00	0.00	18.93	25.00	45.98	25.00	35.08	50.00	16.67	0.00	0.00	0.00	33.33	
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	1	8.33	3.13	0.00	32.78	0.00	31.51	0.00	32.58	100.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2007 Peer Mortgage Data (Eastern)

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

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

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

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES												Geography: FLORIDA				Evaluation Period: JANUARY 1, 2006 TO JUNE 30, 2009				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography									
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
MSA 38940 (Port St Lucie-Ft. Pierce, FL)	718	49.08	2.67	0.84	20.82	41.09	54.94	39.69	21.58	18.38	0.93	1.46	2.55	0.56	0.67					
Non-MSA Counties	232	15.86	0.00	0.00	12.23	1.72	87.65	98.28	0.12	0.00	1.14	0.00	0.17	1.30	0.00					
Limited Review:																				
MD 22744 (Ft. Lauderdale-Pompano Beach-Deerfield Beach, FL)	16	1.09	4.82	0.00	22.76	31.25	42.53	37.50	29.90	31.25	0.00	0.00	0.01	0.00	0.00					
MSA 36740 Partial (Seminole and Orange Counties, FL)	163	11.14	1.89	3.68	19.17	19.63	40.92	41.10	38.03	35.58	0.07	0.23	0.04	0.08	0.06					
MSA 37340 (Palm Bay-Melbourne-Titusville, FL)	17	1.16	1.29	0.00	24.35	41.18	45.41	47.06	28.95	11.76	0.03	0.00	0.05	0.03	0.02					
MSA 42680 (Sebastian-Vero Beach, FL)	189	12.92	0.00	0.00	13.25	6.35	60.33	61.90	26.42	31.75	0.77	0.00	0.30	0.73	1.11					
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	128	8.75	3.42	2.34	21.29	28.91	34.64	39.06	40.49	29.69	0.04	0.06	0.08	0.04	0.02					

* Based on 2008 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Institution ID: SEACOAST NATIONAL BANK (10000014838) (Included)

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: FLORIDA															
Evaluation Period JANUARY 1, 2006 TO JUNE 30,															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms**	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	% of Farms*	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MSA 38940 (Port St Lucie-Ft. Pierce, FL)	3	5.56	1.72	0.00	20.34	33.33	56.37	66.67	21.57	0.00	4.23	0.00	9.09	6.90	0.00
Non-MSA Counties	35	64.81	0.00	0.00	7.50	0.00	92.37	100.00	0.13	0.00	5.24	0.00	0.00	5.71	0.00
Limited Review:															
MD 22744 (Ft. Lauderdale-Pompano Beach-Deerfield Beach, FL)	0	0.00	4.14	0.00	23.08	0.00	42.10	0.00	30.68	0.00	0.00	0.00	0.00	0.00	0.00
MSA 36740 Partial (Seminole and Orange Counties, FL)	0	0.00	1.26	0.00	17.03	0.00	45.20	0.00	36.51	0.00	0.00	0.00	0.00	0.00	0.00
MSA 37340 (Palm Bay-Melbourne-Titusville, FL)	0	0.00	1.01	0.00	19.55	0.00	52.42	0.00	27.02	0.00	0.00	0.00	0.00	0.00	0.00
MSA 42680 (Sebastian-Vero Beach, FL)	12	22.22	0.00	0.00	15.49	0.00	63.13	66.67	21.39	33.33	5.56	0.00	0.00	0.00	12.50
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	4	7.41	4.10	25.00	23.00	0.00	35.39	75.00	37.47	0.00	0.52	25.00	0.00	0.00	0.00

* Based on 2008 Peer Small Business Data -- US and PR

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

*** Source Data - Dun and Bradstreet (2008).

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2006 TO JUNE 30, 2009							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families***	% BANK Loans****	% Families ¹	% BANK Loans**	% Families***	% BANK Loans****	% Families**	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 38940 (Port St Lucie-Fort Pierce, FL)	786	53.04	18.46	6.28	19.34	15.77	22.19	20.90	40.01	57.05	1.92	7.09	3.43	1.61	1.73
Non-MSA Counties	279	18.83	20.04	6.83	19.97	22.66	23.23	18.71	36.76	51.80	4.05	9.68	5.50	3.08	3.93
Limited Review:															
MD 22744 (Fort Lauderdale, Pompano Beach-Deerfield Beach, FL)	8	0.54	20.85	0.00	18.17	0.00	20.48	0.00	40.50	100.00	0.00	0.00	0.00	0.00	0.00
MSA 36740 Partial (Seminole and Orange Counties, FL)	4	0.27	17.89	0.00	17.59	0.00	21.98	0.00	42.54	100.00	0.00	0.00	0.00	0.00	0.01
MSA 37340 (Palm Bay-Melbourne-Titusville, FL)	102	6.88	18.27	13.73	19.30	17.65	22.67	21.57	39.76	47.06	0.26	0.57	0.22	0.25	0.25
MSA 42680 (Sebastian-Vero Beach, FL)	211	14.24	17.61	4.78	19.63	21.53	22.39	18.18	40.37	55.50	1.76	3.49	3.62	0.95	1.58
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	92	6.21	19.86	8.79	18.56	16.48	20.60	13.19	40.98	61.54	0.09	0.51	0.18	0.04	0.08

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

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

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

Institution ID: SEACOAST NATIONAL BANK (10000014838) (Included)

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA								Evaluation Period: JANUARY 1, 2006 TO JUNE 30, 2009					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families ²	% BANK Loans****	% Families* **	% BANK Loans****	% Families* **	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
MSA 38940 (Port St. Lucie-Fort Pierce, FL)	511	59.49	18.46	14.81	19.34	21.10	22.19	25.15	40.01	38.95	12.62	23.38	17.28	14.14	8.99
Non-MSA Counties	173	20.14	20.04	11.05	19.97	15.12	23.23	29.07	36.76	44.77	13.95	17.24	12.50	16.99	12.57
Limited Review:															
MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL)	2	0.23	20.85	0.00	18.17	0.00	20.48	50.00	40.50	50.00	0.00	0.00	0.00	0.00	0.00
MSA 36740 Partial (Seminole and Orange Counties, FL)	4	0.47	17.89	0.00	17.59	0.00	21.98	33.33	42.54	66.67	0.02	0.00	0.00	0.00	0.04
MSA 37340 (Palm Bay-Melbourne-Titusville, FL)	5	0.58	18.27	20.00	19.30	40.00	22.67	20.00	39.76	20.00	0.07	0.00	0.32	0.00	0.00
MSA 42680 (Sebastian-Vero Beach, FL)	139	16.18	17.61	6.77	19.63	24.06	22.39	31.58	40.37	37.59	11.75	13.64	17.74	10.87	9.83

* Based on 2007 Peer Mortgage Data (Eastern)

** As a percentage of loans with borrower income information available. No information was available for 3.3% of loans originated and purchased by bank.

*** Percentage of Families is based on the 2000 Census information.

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

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

MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	25	2.91	19.86	0.00	18.56	17.39	20.60	30.43	40.98	52.17	0.24	0.00	0.24	0.42	0.18
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Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: FLORIDA								Evaluation Period JANUARY 1, 2006 TO JUNE 30, 2009					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ³	% BANK Loans ^{****}	% Families [*] **	% BANK Loans ^{****}	% Families [*] **	% BANK Loans ^{**} **	Overa ll	Low	Mod	Mid	Upp
Full Review:															
MSA 38940 (Port St Lucie-Fort Pierce, FL)	502	55.41	18.46	5.38	19.34	21.33	22.19	22.57	40.01	50.72	1.44	2.29	1.57	1.01	1.53
Non-MSA Counties	169	18.65	20.04	11.52	19.97	20.00	23.23	26.06	36.76	42.42	2.09	4.27	2.80	1.95	1.82
Limited Review:															
MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL)	1	0.11	20.85	0.00	18.17	0.00	20.48	0.00	40.50	100.00	0.00	0.00	0.00	0.00	0.00
MSA 36740 Partial (Seminole and Orange Counties, FL)	4	0.44	17.89	0.00	17.59	66.67	21.98	0.00	42.54	33.33	0.01	0.00	0.02	0.00	0.00
MSA 37340 (Palm Bay-Melbourne-Titusville, FL)	22	2.43	18.27	4.55	19.30	36.36	22.67	22.73	39.76	36.36	0.05	0.00	0.09	0.03	0.05
MSA 42680 (Sebastian-Vero Beach, FL)	154	17.00	17.61	8.00	19.63	20.67	22.39	31.33	40.37	40.00	1.54	1.68	2.00	2.29	1.05

^{*} Based on 2007 Peer Mortgage Data (Eastern)

^{**} As a percentage of loans with borrower income information available. No information was available for 3.3% of loans originated and purchased by bank.

^{***} Percentage of Families is based on the 2000 Census information.

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

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

MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL	54	5.96	19.86	9.62	18.56	11.54	20.60	21.15	40.98	57.69	0.04	0.24	0.00	0.04	0.03
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Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: FLORIDA			Evaluation Period: JANUARY 1, 2006 TO JUNE 30, 2009		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
MSA 38940 (Port St Lucie-Fort Pierce, FL)	718	49.08	66.99	42.48	67.13	14.48	18.38	0.93	1.32	
Non-MSA Counties	232	15.86	62.02	53.45	67.67	18.10	14.22	1.114	2.12	
Limited Review:										
MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL)	16	1.09	66.53	56.25	43.75	12.50	43.75	0.00	0.00	
MSA 36740 Partial (Seminole and Orange Counties, FL)	163	11.14	63.79	36.81	56.44	15.95	27.61	0.07	0.08	
MSA 37340 (Palm Bay-Melbourne- Titusville, FL)	17	1.16	65.40	41.18	41.18	17.65	41.18	0.03	0.05	
MSA 42680 (Sebastian-Vero Beach, FL)	189	12.92	65.38	48.15	68.25	20.63	11.11	0.77	1.12	
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	128	8.75	65.34	43.75	53.13	15.63	31.25	0.04	0.04	

* Based on 2008 Peer Small Business Data -- US and PR

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

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2008).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 3.49% of small loans to businesses originated and purchased by the bank.

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: FLORIDA		Evaluation Period: JANUARY 1, 2006 TO JUNE 30, 2009			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share [*]	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans ^{****}	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
MSA 38940 (Port St Lucie-Fort Pierce, FL)	3	5.56	94.00	0.00	0.00	33.33	66.67	4.23	2.63
Non-MSA Counties	35	64.81	89.87	85.71	80.00	14.29	5.71	5.24	6.48
Limited Review:									
MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL)	0	0.00	96.87	0.00	0.00	0.00	0.00	0.00	0.00
MSA 36740 Partial (Seminole and Orange Counties, FL)	0	0.00	95.48	0.00	0.00	0.00	0.00	0.00	0.00
MSA 37340 (Palm Bay-Melbourne-Titusville, FL)	0	0.00	98.37	0.00	0.00	0.00	0.00	0.00	0.00
MSA 42680 (Sebastian-Vero Beach, FL)	12	22.22	92.18	0.00	91.67	8.33	0.00	5.56	0.00
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	4	7.41	94.73	25.00	75.00	0.00	25.00	0.52	0.00

* Based on 2008 Peer Small Business Data -- US and PR

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

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2008).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 3.70% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: FLORIDA									
Evaluation Period: OCTOBER 10, 2006 TO AUGUST 31, 2009									
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
MSA 38940 (Port St Lucie-Fort Pierce, FL)	1	996	40	274	41	1,270	31.92	0	0
Non-MSA Counties	0	0	31	46	31	46	1.16	0	0
All Assessment Areas	0	0	12	1,652	12	1,652	41.77	0	0
Statewide	1	801	1	75	2	876	22.02	0	0
Limited Review:									
MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL)	0	0	0	0	0	0	0.00	0	0
MSA 36740 Partial (Seminole and Orange Counties, FL)	0	0	3	5	3	5	0.00	0	0
MSA 37340 (Palm Bay-Melbourne-Titusville, FL)	0	0	2	6	2	6	0.00	0	0
MSA 42680 (Sebastian-Vero Beach, FL)	0	0	19	89	19	89	2.24	0	0
MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL)	0	0	6	25	6	25	0.63	0	0

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

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

(10000014838) (Included)

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: FLORIDA				Evaluation Period: OCTOBER 10, 2006 TO August 31, 2009					
	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
MSA 38940 (Port St Lucie-Ft. Pierce, FL)	57.07	16	39.02	0.00	12.50	62.50	25.00	3	4	-1	+1	-2	+1	3.58	17.57	57.55	21.31
Non-MSA Counties	12.24	8	19.51	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	12.18	87.76	0.06
Limited Review:																	
MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield Beach, FL)	1.46	1	2.44	0.00	0.00	0.00	100.00	1	0	0	0	+1	0	3.57	26.43	43.13	26.88
MSA 36740 Partial (Seminole and Orange Counties, FL)	12.87	3	7.32	0.00	33.33	33.33	33.33	0	0	0	0	0	0	2.12	20.02	43.24	34.62
MSA 37340 (Palm Bay-Melbourne- Titusville, FL)	.70	2	4.88	0.00	0.00	50.00	50.00	2	1	0	-1	+1	+1	1.34	19.21	51.27	28.17
MSA 42680 (Sebastian-Vero Beach, FL)	11.28	8	19.51	0.00	0.00	75.00	25.00	0	0	0	0	0	0	0.00	16.49	61.66	21.84
MD 48424 (West Palm Beach-Boca Raton- Boynton Beach, FL)	4.37	3	7.32	0.00	0.00	66.67	33.33	1	3	0	0	0	-2	4.21	29.32	33.88	32.37

