



**LARGE BANK**

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

**Public Disclosure**

**August 4, 2003**

**Community Reinvestment Act  
Performance Evaluation**

**First National Bank and Trust Company of the Treasure Coast  
Charter Number: 14838**

**815 U.S. 1 & Colorado Avenue  
Stuart, Florida 34995**

**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 *First National Bank and Trust Company of the Treasure Coast (FNBTC)* with respect to the Lending, Investment, and Service Tests:

| <b>Performance Levels</b> | First national Bank of the Treasure Coast<br>Performance Tests |                 |              |
|---------------------------|--|-----------------|--------------|
|                           | Lending Test*  | Investment Test | Service Test |
| Outstanding               | <b>X</b>   |                 | <b>X</b>     |
| High Satisfactory         |  |                 |              |
| Low Satisfactory          |  | <b>X</b>        |              |
| 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.
- Excellent distribution of loans by the income level of the borrower. The distribution of HMDA loans is excellent. The distribution of small loans to businesses is good.
- Excellent performance for CD lending that had a positive effect on the lending test. The bank originated a high number and dollar amount of CD loans that were responsive to difficult to meet assessment area credit needs and were complex and innovative.
- Retail delivery systems are readily accessible to geographies and individuals of different income levels. The percent of offices in low- and moderate-income geographies is equal to or exceeds the percent of the population living in such geographies.
- An excellent level of CD services, with the bank taking a leadership role in some instances.

## 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.

**Block Numbering Area (BNA):** A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

**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.

**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 household 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 or a block numbering area 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 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).

**Home Mortgage Loans:** such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in-group quarters. In 100 percentage 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 percentage of the area median income, or a median family income that is less than 50 percentage, 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 primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

**Moderate-Income:** Individual income that is at least 50 percentage and less than 80 percentage of the area median income, or a median family income that is at least 50 percentage and less than 80 percentage, 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

**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 more than 120 percentage of the area median income, or a median family income that is more than 120 percentage, in the case of a geography.

## Description of Institution

First National Bank and Trust Company of the Treasure Coast is a large community bank headquartered in Stuart, Florida, a metropolitan area. FNBTC is a wholly owned subsidiary of Seacoast Banking Corporation of Florida, a one-bank holding company also headquartered in Stuart, Florida. As of December 31, 2002, FNBTC reported total assets of \$1.3 billion. FNBTC is an intrastate bank with 28 offices serving the Fort Pierce - Port Saint Lucie Metropolitan Statistical Area (MSA) and the non-metropolitan area of Indian River County.

The bank has six subsidiaries. Four of these are operating subsidiaries and two are statutory subsidiaries. The operating subsidiaries are wholly owned FNB Brokerage Services, Inc., FNB Property Holdings, Inc., FNB RE Services, Inc., (wholly owned subsidiary of FNB Property Holdings, Inc.), and South Branch Building, Inc. which operates and owns one of the bank's branches. The statutory subsidiaries are FNB Insurance Services, Inc. (a shell corporation) and Big O RV Resort, Inc., which currently have no assets and were previously used to operate OREO property obtained through foreclosure. The operation of these subsidiaries does not affect the bank's ability to lend or invest in its community.

While the bank offers a full range of loan products, FNBTC's focus is equally weighted between retail and commercial lending. As of December 31, 2002, total loans represented 53% of total assets and consisted of 1-4 family residential real estate loans (39%), commercial and commercial real estate loans (43%) and consumer loans (18%). Net loans represented 66% of total deposits.

There are no legal, financial or other factors impeding FNBTC's ability to help meet the credit needs of the communities it serves. As of December 31, 2002, FNBTC reported Tier 1 Capital of \$97 million, which represented 8% of total assets.

FNBTC's performance was rated "Satisfactory" at its last CRA evaluation dated May 1, 2000.

## 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 HMDA, small loans to businesses and CD loans. Small loans to farms were not analyzed. The number of small loans to farms is not material and an analysis is not meaningful. The bank did not elect to have consumer loans reviewed.

With the exception of community development (CD) loans, the evaluation period for the Lending Test is January 1, 2000 through December 31, 2002. For CD loans, the Investment Test and the Service Test, the evaluation period is May 1, 2000 through August 4, 2003.

### Data Integrity

This evaluation is based on accurate data. As part of this CRA evaluation, we relied upon management's internal review. CD loans, investments and services submitted by FNBTC management were verified to ensure that they met the regulatory definition for community development. Some items submitted by FNBTC 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

FNBTC has designated two assessment areas: the Fort Pierce - Port Saint Lucie MSA and Indian River County, a non-metropolitan area. The Fort Pierce - Port Saint Lucie MSA was selected for a full-scope review. This MSA represents FNBTC's major market and contains approximately 84% of the bank's deposits and 82% of lending activity over the evaluation period. The ratings are based primarily on conclusions reached in the evaluation of FNBTC's performance in the full-scope area.

The non-metropolitan area of Indian River County received a limited-scope review. Refer to Appendix A for additional information regarding which areas received full-scope and limited-scope reviews.

The delineation of the AA's did not reflect any illegal discrimination and did not arbitrarily exclude low- or moderate-income geographies.

### Ratings

The bank's overall rating is based primarily on the area receiving the full-scope review. Since the bank's strategic focus during this evaluation period has been retail lending, HMDA loans are more heavily weighted than loans to small businesses. In addition, there are approximately four times as many HMDA loans, in both number and dollar volume, as small loans to businesses.

### Other



Two community contacts were made during this examination. Both contacts were in the Fort Pierce - Port Saint Lucie MSA. One contact was a local, non-profit organization whose mission was to provide CD services to low- and moderate-income individuals in Martin and Saint Lucie Counties. The contact in Martin County was a community development corporation (CDC) that provides affordable housing for low-income people. Identified credit needs included loans to low- and moderate-income individuals for affordable housing and homebuyer education for first time homebuyers. Due to factors mentioned in Market Profiles in Appendix B, the need for affordable housing related credit in the Fort Pierce - Port Saint Lucie MSA is significant.

### **Fair Lending Review**

We found no evidence of illegal discrimination or other illegal credit practices.

## Conclusions with Respect to Performance Tests

### LENDING TEST

#### Conclusions for Area Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "**Outstanding**". Based on a full-scope review, the bank's performance in the full-scope assessment area (AA) is excellent.

#### Lending Activity

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

The bank's lending activity reflects good responsiveness to the credit needs of its full-scope AA. Based on 2001 aggregate data, FNBTC had HMDA and small business loan market shares in the full-scope MSA of 8% and 4%, respectively, which ranked third and seventh, respectively. During the same time, FNBTC's 16% deposit market share ranked second. However, competition within the full-scope AA is intense and there are many credit card lenders who make loans but do not take deposits from the area.

In Martin County, the FNBTC's 12% HMDA market share ranked number one. The bank ranked number one in all categories of HMDA lending: home purchase (11% market share), home improvement (26% share), home mortgage refinancing (12% share). The bank's 18% deposit market share also ranked number one in Martin County. The bank's 6% market share for small business loans ranked sixth. However, the five higher ranked financial institutions were credit card issuers such as American Express and Capital One.

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

Given the mitigating factors detailed below, the overall geographic distribution of loans throughout the full-scope AA is adequate, even though lending penetration in low- and moderate-income geographies is very low. The geographic distribution of the bank's lending activity did not carry much weight in our overall conclusions about the lending test due to the mitigating factors discussed below.

These facts mitigate the low levels of lending in low- and moderate-income geographies.

- There are three low- income and nine moderate-income geographies in the full-scope AA of Fort Pierce-Port St. Lucie MSA. There are no low-income geographies in Martin County, where FNBTC is headquartered and where most of its offices are located.
- All of the low-income and five of the nine moderate-income census tracts are located in northern St. Lucie County where FNBTC has only two offices, one since June 2001.
- The largest concentration of owner-occupied housing units in low- and moderate-income geographies is in northern St. Lucie County (Ft. Pierce). 100% of owner occupied units in low-income geographies, and 81% of such units in moderate- income geographies, are located in northern St. Lucie County.

## **Home Mortgage Loans**

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

In view of mitigating factors detailed at the beginning of this section, geographic distribution of HMDA loans is adequate. The geographic distribution is adequate for home purchase loans, home improvement loans, home mortgage refinance loans, and multi-family loans.

In view of mitigating factors detailed at the beginning of this section, the geographic distribution of *home purchase loans* is adequate. The percentage of home purchase loans in low-income geographies is significantly lower than the percentage of owner-occupied units in these geographies. The percentage of home purchase loans in moderate-income geographies is significantly lower than the percentage of owner-occupied units in these geographies. The bank's market share of home purchase loans in low-income geographies is lower than their overall market share. The bank's market share of home purchase loans in moderate-income geographies is lower than their overall market share.

In view of mitigating factors detailed at the beginning of this section, the geographic distribution of *home improvement loans* is adequate. The bank originated no home improvement loans in low-income geographies. The percentage of home improvement loans in moderate-income geographies is lower than the percentage of owner-occupied units in these geographies. The bank's market share of home improvement loans in moderate-income geographies is lower than their overall market share.

In view of mitigating factors detailed at the beginning of this section, the geographic distribution of *home mortgage refinance loans* is adequate. The percentage of home mortgage refinance loans in low-income geographies is significantly lower than the percentage of owner-occupied units in these geographies. The percentage of home mortgage refinance loans in moderate-income geographies is significantly lower than the percentage of owner-occupied units in these geographies. The bank's market share of home mortgage refinance loans in low-income geographies is significantly lower than their overall market share. The bank's market share of home mortgage refinance loans in moderate-income geographies is near to their overall market share.

In view of mitigating factors detailed at the beginning of this section, the geographic distribution of *multi-family loans* is adequate. The bank originated no multi-family loans in low-income geographies. The percentage of multi-family loans in moderate-income geographies is lower than the percentage of multi-family units in these geographies. The bank had no market share of home purchase loans in low-income geographies because it originated no small business loans in low-income geographies during 2001, the most recent year for which aggregate small business data is available.

## **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.

In view of mitigating factors detailed at the beginning of this section, the geographic distribution of small loans to businesses in the full-scope AA is good. The percentage of small loans to businesses in low-income geographies is lower than the percentage of businesses in these geographies. The percentage of small loans to businesses in moderate-income geographies exceeds the percent of businesses in these geographies. The bank had no market share of small loans to businesses in low-

income geographies because it originated no small business loans in low- income geographies during 2001, the most recent year for which aggregate small business data is available. The bank's market share of small loans to businesses in moderate-income geographies exceeds their overall market share.

## **Lending Gap Analysis**

No unexplained, conspicuous gaps in lending were identified. We evaluated the lending distribution in the full-scope AA 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. This performance had a positive effect on the bank's overall geographic distribution analysis.

## ***Inside/Outside Ratio***

The bank's lending activity reflects excellent concentration within its assessment areas. A substantial majority of the bank's loan originations is within its two defined assessment areas. Overall, 94% of FNBTC's loan originations are within its two AA's. By loan product, 94% of HMDA loans, 94% of small loans to businesses, and 100% of CD loans and small loans to farms were inside the AA's. This analysis was performed for the entire bank rather than on individual AA's. This performance had a positive effect 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 throughout the full-scope AA is excellent. The distribution of HMDA loans is excellent. The distribution of small loans to businesses is good.

The following fact mitigates the relatively low levels of lending in low- and moderate-income geographies.

- 43% of low- and moderate-income families are located in northern St. Lucie County.

## ***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.

Overall, the distribution of HMDA loans by borrower income level is excellent. The distribution of loans by borrower income level is excellent for home purchase, home improvement and home mortgage refinance loans.

In view of mitigating factors detailed at the beginning of this section, the distribution of *home purchase loans* is excellent. The bank's percentage of home purchase loans to low-income borrowers is below the percentage of low-income families that live in the full scope AA. The bank's percentage of home purchase loans to moderate-income borrowers is near to the percentage of moderate-income families that live in the full scope AA. The bank's market share to low-income borrowers exceeds their overall market share. The bank's market share to moderate-income borrowers is near to their overall market share.

The distribution of *home improvement loans* is excellent. The bank's percentage of home improvement loans to low-income borrowers is near to the percentage of low-income families that live in the full scope AA. The bank's percentage of home improvement loans to moderate-income borrowers exceeds the percentage of moderate-income families that live in the full scope AA. The bank's market share to low-income borrowers exceeds their overall market share. The bank's market share to moderate-income borrowers is near to their overall market share.

The distribution of *home mortgage refinance loans* is excellent. The bank's percentage of home mortgage refinance loans to low-income borrowers is near to the percentage of low-income families that live in the full scope AA. The bank's percentage of home mortgage refinance loans to moderate-income borrowers exceeds the percentage of moderate-income families that live in the full scope AA. The bank's market share to low-income borrowers exceeds their overall market share. The bank's market share to moderate-income borrowers exceeds their overall market share.

### **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.

The distribution of small loans to businesses throughout the full-scope AA is good. The bank's percentage of small loans to small businesses (businesses with annual revenues of \$1 million or less) is reasonably close to the percentage of small businesses in the full scope AA. The bank made 47% of its small loans to small businesses, compared to the demographic of 64. However, all reporting lenders in the AA in 2001 only made 38% of their small loans to small businesses. This shows that while the bank did not meet the demographic, it did very well in the context of the competitive environment. The bank's market share of small loans to small businesses exceeds their overall market share of small loans to all businesses. A majority of the bank's loans to small businesses is for amounts of \$100 thousand or less. In the full scope AA the percentage of loans for amounts of \$100 thousand or less exceeds the percentage of small businesses in the AA, which is excellent.

### **Community Development Lending**

Refer to Table 1 in appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

In the Fort Pierce-Port St. Lucie MSA, where community development lending opportunities are limited, community development lending is excellent and had a positive effect on the lending test. Not only did the bank originate a high number and dollar amount of community development loans, but the loans are responsive to assessment area credit needs and exhibited complexity and innovativeness. The dollar volume of community development loans in the Fort Pierce-Port St. Lucie MSA represents 16% of the bank's prorated Tier 1 Capital as of December 31, 2002.

The table below summarizes the number and amount of community development loans originated during the evaluation period in the full-scope AA area and demonstrates the bank's responsiveness to assessment area credit needs. Eight-seven percent (87%) of the dollar amount of CD loans addresses the need for affordable housing for low- and moderate-income residents. According to community contacts, affordable housing is a pressing need throughout the assessment area.

## Community Development Lending MSA 2710 (Fort Pierce-Port St. Lucie, FL)

| Purpose              | Number    | \$000s        |
|----------------------|-----------|---------------|
| Affordable Housing   | 12        | 11,729        |
| Community Service    | 15        | 1,075         |
| Economic Development | 2         | 626           |
| <b>Total</b>         | <b>29</b> | <b>13,430</b> |

Affordable housing lending helped provide 481 housing units for low- and moderate-income families, 81 of which are for owner-occupancy. Community contacts noted the need for construction of affordable owner-occupied housing units in the assessment area, and the lack of builders producing such housing. Market prices of owner-occupied housing are beyond the reach of most low- and moderate-income families.

FNBTC's community development lending activity with a local CDC exemplifies complex and innovative financing. The loans are complex because they required extended interaction with multiple agencies to structure the financing package and significant administrative time. The bank formed a strategic partnership with the CDC and took a leadership role in structuring the project that used a combination of bank financing, Florida Housing Finance HOME funds, and subsidy funds from the State Housing Initiatives Partnership ("SHIP"), the United States Department of Agriculture ("USDA"), and the Federal Home Loan Bank of Atlanta. When construction is completed, the project will provide much needed affordable, owner-occupied housing in Indiantown, a blighted residential area in Martin County. Martin County is in the Fort Pierce-Port St. Lucie MSA.

### Product Innovation and Flexibility

Product innovation and flexibility had a positive impact on the Lending Test conclusions for the Fort Pierce - Port St. Lucie MSA. Flexible lending programs had a positive impact because of the positive number of loans to low- and moderate-income individuals that resulted from these programs.

The bank has two proprietary flexible lending programs: The First Affordable Home Buyer's Program and the Special Home Equity Loan Program. The bank also participates in affordable housing programs sponsored by State organizations. These programs include: State sponsored programs such as SHIP, HOME and Rural Housing. None of the flexible loan programs in which the bank participates are considered innovative. The number and dollar amount of loans made within the Fort Pierce - Port Saint Lucie MSA during the evaluation period are shown below.

#### **Affordable Home Buyer's Program - 59 loans - \$4,857,000**

Program designed by the bank. 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. Borrower can put 3% to 5% down. 2% of funds may come from gifts, grants or loans. The borrower can obtain a mortgage loan with a 95% loan-to-value ratio, which does not require private mortgage insurance (PMI). This program was implemented in the third quarter of 1996.

**Special Home Equity Loan Program - 68 loans – \$1,313,000**

A consumer loan program targeting individuals residing in low- and moderate-income geographies was implemented at the beginning of 2000. Flexible underwriting criteria include: Reduced interest rate; no loan fee; annual household income cannot exceed 80% of updated HUD median income for the MSA; customer pays closing costs but bank will pay flood determination fee.

**SHIP/Rural Housing/HOME – 43 loans – 2,504,000**

- SHIP loans are offered through the bank’s partnership with the local lending consortiums. The funds provide down payment and closing cost assistance up to \$25,000. Maximum loan to value of 90% SHIP funds can assist borrower with down payment and to pay closing costs. Ratios - 32/40 or higher back-end ratio with compensating factors as agreed to by Lender. Monthly housing costs must not exceed 30% of area’s median gross income adjusted for family size. No PMI unless loan exceeds 95% loan to value for conventional loan or 80% loan to value for Bond Program Loan.
- The Florida Housing Finance Corporation administers the HOME Program, which provides second mortgage loans up to \$15,000 at zero interest rates. The HOME Program funds are provided during the permanent financing to the homeowner to assist low- to moderate-income individuals with down payment and closing costs assistance. The underwriting/loan program guidelines are the same as the SHIP program outlined above.
- The Bank is an approved Rural Housing Service AKA Rural Development USDA lender. The Bank participates in the Guarantee Housing Loan Program for individuals who may also be receiving SHIP and/or HOME subsidies but are marginal loans. The guarantee provides the offsetting mitigating support for the origination of the loan. The underwriting is based on the requisites established by USDA and the loan program guidelines are the same as the SHIP program outlined above.

**Conclusions for Area Receiving Limited-Scope Reviews**

Based on the limited-scope reviews, the bank’s performance under the Lending Test in the Indian River County non-MSA is not inconsistent with the bank’s overall “Outstanding” performance under the Lending Test. 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**

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

The bank’s performance under the Investment Test is rated “**Low Satisfactory**”. Based on a full-scope review, the bank’s performance in the Fort Pierce-Port St. Lucie MSA is adequate given available opportunities. Investments in the MSA totaled \$2.4 million, or 3.0% of the bank’s prorated Tier 1 Capital as of December 31, 2002. Opportunities exist in the MSA for the bank to make qualified investments. However, they are limited and competition for them is intense since many large nationwide and regional banks operate in the bank’s assessment area.

**Current Period Investments:** During the evaluation period, the bank originated one community development investment totaling \$210 thousand in the Fort Pierce-Port St. Lucie MSA. The investment is in a Florida Housing Finance Corporation Taxable Housing Revenue Bond totaling approximately \$5.7 million. The bond was issued for the construction of 340 units of rental housing in the city of Fort Pierce, of which at least 50% will be available to low-income tenants, based on HUD guidelines. The investment is responsive to known affordable housing needs in Fort Pierce, which has the highest concentration of low- and moderate-income geographies in the bank's assessment area.

**Current Period Grants and Donations:** During the evaluation period, the bank originated 93 grants and donations in its MSA assessment area. The grants, totaling \$257 thousand, were to organizations whose primary purpose meets the definition of community development. The bank focused its efforts in this area to compensate for the lack of formal investment opportunities that would directly benefit its Fort Pierce-Port St. Lucie MSA assessment area. Significant among the bank's grants and donations during the evaluation period, were grants to Habitat for Humanity totaling \$17 thousand. The organization constructs housing in the bank's assessment area that is made available to very low-income homebuyers. Additionally, the bank provided Indiantown Non-Profit, Incorporated, the only CDC operating in the full-scope AA, with \$15 thousand in grants. The funds were targeted to assist in the construction of affordable owner-occupied and rental housing in the Indiantown community of Martin County, an area targeted for housing revitalization. Both grants were responsive to the affordable housing needs in the bank's assessment area.

Most grants (approximately 80% of the dollar total) were directed toward organizations that provide community services to low- and moderate-income individuals and families in the bank's assessment area. These organizations are responsive to community needs and provide services such as counseling, transitional housing, educational programs, after school programs, etc. in the Ft. Pierce-St Lucie MSA. In addition, the bank has donated to the Florida Housing Coalition. The Coalition provides information, training, and technical assistance on affordable housing and related issues to community organizations throughout the State of Florida.

**Prior Period Investments:** Prior to this evaluation period, four investments with a current book value of \$1.962 million were made in the bank's full-scope AA. Prior period investments, which do not receive as much weight as current period investments, represent 81% of total full-scope AA investments at this examination. Prior period investments consist primarily in a \$721 thousand Federal National Mortgage Association ("FNMA") security whose proceeds were used to finance a multi-family apartment complex for low- and moderate-income people and a \$991 thousand Fort Pierce Capital Improvement Revenue Bond the proceeds of which were used for capital improvements in the City's Empowerment Zone. Both investments continue to have a positive impact on the community. The housing complex continues to provide affordable housing for low- and moderate-income people and the capital improvements continue to help provide economic revitalization and stabilization to the low- and moderate-income geographies that comprise the Enterprise Zone designated by the State of Florida.

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

Based on a limited-scope review, the bank's performance under the Investment Test in Indian River County is not inconsistent with the bank's overall "Low Satisfactory" performance under the Investment Test.



## SERVICE TEST

### Conclusions for Area Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "**Outstanding**". Based on a full-scope review, the bank's performance in the Fort Pierce - Port St. Lucie MSA is excellent. Delivery systems are readily accessible to geographies and individuals of different income levels throughout the full-scope assessment area. The bank's ATM network offers an effective alternative delivery system for delivering retail-banking services in low- and moderate-income geographies. The bank is 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.

FNBTC's delivery systems are readily accessible to geographies and individuals of different income levels throughout the full-scope assessment area. Accessibility is excellent in the Fort Pierce - Port St. Lucie MSA. The percent of offices in low-income geographies is equal to the percent of the population living in such geographies. The percent of offices in moderate-income geographies exceeds the percent of the population living in such geographies.

Branch openings/closings have not affected the accessibility of delivery systems in the full-scope area. Since the last examination, there has been one branch closing in a middle-income geography and three branch openings in middle-income geographies.

Office hours and services in the full-scope AA are comparable among locations regardless of the income level of the geography. There are no significant differences in banking hours provided by the branches in the different geographies.

FNBTC's ATM network offers an effective alternative delivery system for delivering retail banking services in moderate-income geographies and to low- and moderate-income individuals. In the Fort Pierce - Port St. Lucie MSA, the percent of ATMs in moderate-income geographies exceeds the percent of the population that resides in these geographies. FNBTC has 23 ATMs in the full-scope AA. Five of these ATMs (3 onsite and 2 offsite), or 28%, are in moderate-income geographies. Bank customers can use ATM or debit cards at any location having access to the Cirrus, Honor, or Presto networks without any service charges by FNBTC.

### Community Development Services

Considering the level of staff participation and the number of organizations and individuals benefiting, the level of community development services provided by FNBTC is excellent, often taking a leadership role in the Pierce-Port St. Lucie MSA assessment area. Such services included a high level of educational programs and technical assistance. Although the services provided are not innovative, they are responsive to stated assessment area needs.

During the evaluation period, the bank participated in at least 30 seminars and classes attended by approximately 925 individuals. Most presentations (83%) were homebuyer education classes presented

in conjunction with the Martin County or St. Lucie County Lending Consortiums and the Consumer Credit Counseling Service. These regularly scheduled, six hour, multi-lingual courses cover the pre-home buying process including the mortgage process, realtor relations, insurance needs, credit and budgeting, appraisals and inspections, and available subsidy programs. An FNBTC officer has assumed a leadership role in organizing these classes by serving as Chairman of the Martin County and St. Lucie County Lending Consortium. Other educational programs are directed toward financial literacy, job training skills and entrepreneur skills. Community contacts have stated a need for homebuyer education in the MSA assessment area, particularly for Hispanic homebuyers.

Also, bank officers and employees regularly provide technical assistance to organizations that provide community development services in the bank's full-scope AA. Thirty-six different officers and employees provided technical assistance to 38 different organizations during the evaluation period. Examples of organizations receiving technical assistance include Habitat for Humanity, the Samaritan Center, the Florida Housing Coalition, Jensen Beach Main Street, Neighborhood Housing Services of Fort Pierce, and the Fort Pierce Enterprise Zone Program. Of particular note is the technical leadership provided by a bank officer to six organizations in applying for direct subsidies under the Affordable Housing Program ("AHP") of the Federal Home Loan Bank of Atlanta ("FHLB"). Of eight applications submitted, three have been approved and two have been funded for a total of \$400 thousand. The two projects will provide 46 affordable single-family homes in the bank's assessment area. Affordable housing is a stated need the full-scope AA. Participation in the AHP requires considerable administrative time on the part of the sponsoring bank because it must administer and disburse the funds as well as monitor the project and provide documentation to the FHLB.

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

Based on limited-scope reviews, the bank's performance under the Service Test in Indian River County is not inconsistent with the bank's overall "Outstanding" performance under the Service Test.

## 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”).

|  |  |                          |
|--|--|--------------------------|
| <b>Time Period Reviewed</b>  | Lending Test (excludes CD Loans): 01/01/2000 to 12/31/2002<br>Investment and Service Tests and<br>CD Loans: 05/01/2000 to 08/04/2003 |                          |
| <b>Financial Institution</b>   | <b>Products Reviewed</b>   |                          |
| First National Bank & Trust Company of the Treasure Coast, Stuart, Florida | HMDA, Small Business and CD Loans<br>Flexible and innovative products  |                          |
| <b>Affiliate(s)</b>  | <b>Affiliate Relationship</b>  | <b>Products Reviewed</b> |
| N/A  |  |                          |
| <b>List of Assessment Areas and Type of Examination</b>                    |  |                          |
| <b>Assessment Area</b>   | <b>Type of Exam</b>  | <b>Other Information</b> |
| Fort Pierce-Port St. Lucie MSA<br>#2710                                    | Full-Scope   |                          |
| Indian River County nonMSA   | Limited-Scope  |                          |

# Appendix B: Market Profiles for Full-Scope Areas

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## Table of Contents

### Market Profiles for Areas Receiving Full-Scope Reviews

Fort Pierce-Port St. Lucie MSA      B - 2

## Fort Pierce-Port St. Lucie MSA

| Demographic Information for Full Scope Area: Fort Pierce-Port St. Lucie MSA |         |            |                                    |               |              |            |
|---|---------|------------|------------------------------------|---------------|--------------|------------|
| Demographic Characteristics   | #       | Low % of # | Moderate % of #                    | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts/BNAs)  | 58      | 5.17       | 15.52                              | 53.45         | 20.69        | 5.17       |
| Population by Geography   | 251,071 | 5.99       | 11.92                              | 62.59         | 19.49        | 0.01       |
| Owner-Occupied Housing by Geography   | 75,091  | 1.88       | 11.32                              | 63.95         | 22.85        | 0.00       |
| Business by Geography   | 26,474  | 3.34       | 16.25                              | 58.18         | 22.22        | 0.02       |
| Farms by Geography  | 1,167   | 2.23       | 11.05                              | 70.52         | 16.20        | 0.00       |
| Family Distribution by Income Level   | 73,773  | 18.18      | 19.05                              | 23.65         | 39.12        | 0.00       |
| Distribution of Low and Moderate Income Families throughout AA Geographies  | 27,465  | 8.56       | 16.45                              | 61.81         | 13.18        | 0.00       |
| Median Family Income  |         | 33,541     | Median Housing Value               |               | 100,622      |            |
| HUD Adjusted Median Family Income for 2002                                  |         | 52,400     | Unemployment Rate (1990 US Census) |               | 2.73%        |            |
| Households Below Poverty Level  |         | 9.89%      |                                    |               |              |            |

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

Source: 1990 US Census and 2002 HUD updated MFI

FNBTC’s Fort Pierce - Port Saint Lucie assessment area consists of the entire MSA, which contains two counties: Martin County (where FNBTC is headquartered) and Saint Lucie County adjacent to the north. Saint Lucie County is the larger of the two counties with 43,644 families and 39 geographies compared to 30,129 families and 19 geographies in Martin County. All three low-income geographies in the MSA are located in the northern portion of Saint Lucie County. There are no low-income geographies in Martin County.

The Treasure Coast Region is one of the wealthiest and fastest growing sections of Florida. FNBTC began operations in Martin County in 1933 and is the largest commercial bank in the County in terms of deposits and offices (19). FNBTC began operations in southern Saint Lucie County in 1985, where the bank has six offices. Operations in northern Saint Lucie County began in 1991, where the bank has two offices. FNBTC 9% deposit market share in Saint Lucie ranks fifth.

Competition is strong in the MSA. There are numerous community and regional bank offices as well as offices of savings and loan associations and other financial institutions such as credit unions and brokerage firms.

The primary credit needs identified through community contacts were financing for affordable housing (i.e. single family rental, multi-family rental, and home ownership), funds to repair and rehabilitate existing homes, and down payment assistance for low income families seeking to own a home. Much of the single family housing units in the Treasure Coast Region is beyond the price range of low-and moderate-income families. And there has been very little multi-family housing construction in the area in recent years. This has resulted in decreased vacancy rates and higher rental payments. There is also an identified need for commercial-industrial rehabilitation to repair and renovate buildings that have deteriorated over time. The need is particularly acute for commercial-industrial improvements in downtown areas.

Opportunities exist for the bank to make qualified investments and CD loans within the MSA, but not to a great extent. Most of these opportunities are in Saint Lucie County.

## Appendix C: Tables of Performance Data

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### 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: 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. 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 loan to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration.
- 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, tracked, and recorded by the bank's financial reporting system.

**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: FNBTC  |                                     |               |            |                           |            |                      |            |                               |            |                      |           |                                      |
| Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002 |                                     |               |            |                           |            |                      |            |                               |            |                      |           |                                      |
| MA/Assessment Area (2002):                              | % 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) |                                      |
| <b>Full Review:</b>                                     |                                     |               |            |                           |            |                      |            |                               |            |                      |           |                                      |
| Fort Pierce-Port St. Lucie MSA                          | 82.09                               | 4,121         | 363,452    | 1,076                     | 98,615     | 25                   | 2,359      | 29                            | 13,430     | 5,251                | 477,856   | 84.00                                |
| <b>Limited Review:</b>                                  |                                     |               |            |                           |            |                      |            |                               |            |                      |           |                                      |
| Indian River County -NonMSA                             | 17.91                               | 903           | 93,699     | 227                       | 24,492     | 9                    | 662        | 2                             | 1,140      | 1,141                | 119,993   | 16.00                                |

\* Loan Data as of December 31, 2002. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is From May 01, 2000 to August 04, 2003.

\*\*\* Deposit Data as of June 30, 2002. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

| Geographic Distribution: HOME PURCHASE |                           | Geography: FNBTC |                        |              |                             | Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002 |                           |              |                          |              |                                 |      |      |      |      |  |
|--|---------------------------|------------------|------------------------|--------------|-----------------------------|---|---------------------------|--------------|--------------------------|--------------|---------------------------------|------|------|------|------|--|
| 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  |  |
| <b>Full Review:</b>                    |                           |                  |                        |              |                             |   |                           |              |                          |              |                                 |      |      |      |      |  |
| Fort Pierce-Port St. Lucie MSA         | 1,838                     | 83.43            | 1.88                   | 0.16         | 11.32                       | 3.48  | 63.95                     | 72.09        | 22.85                    | 24.27        | 5.47                            | 2.04 | 2.56 | 5.71 | 5.59 |  |
| <b>Limited Review:</b>                 |                           |                  |                        |              |                             |   |                           |              |                          |              |                                 |      |      |      |      |  |
| Indian River County -NonMSA            | 365                       | 16.57            | NA                     | NA           | 2.78                        | 0.00  | 37.87                     | 43.01        | 59.35                    | 56.99        | 3.08                            | NA   | 0.00 | 3.31 | 2.99 |  |

\* Based on 2001 Peer Mortgage Data: Southeast Region 1.

\*\* 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

**Table 3. Geographic Distribution of Home Improvement Loans**

| Geographic Distribution: HOME IMPROVEMENT               |                              |              |                        |              |                             |              |                           |              |                          |              |                                |      |       |       |       |
|---|------------------------------|--------------|------------------------|--------------|-----------------------------|--------------|---------------------------|--------------|--------------------------|--------------|--------------------------------|------|-------|-------|-------|
| Geography: FNBTC  |                              |              |                        |              |                             |              |                           |              |                          |              |                                |      |       |       |       |
| Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002 |                              |              |                        |              |                             |              |                           |              |                          |              |                                |      |       |       |       |
| 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 | Overall                        | Low  | Mod   | Mid   | Upp   |
| <b>Full Review:</b>                                     |                              |              |                        |              |                             |              |                           |              |                          |              |                                |      |       |       |       |
| Fort Pierce-Port St. Lucie MSA                          | 532                          | 85.81        | 1.88                   | 0.00         | 11.32                       | 5.83         | 63.95                     | 68.98        | 22.85                    | 25.19        | 15.65                          | 0.00 | 10.84 | 14.71 | 22.32 |
| <b>Limited Review:</b>                                  |                              |              |                        |              |                             |              |                           |              |                          |              |                                |      |       |       |       |
| Indian River County -NonMSA                             | 88                           | 14.19        | NA                     | NA           | 2.78                        | 1.14         | 37.87                     | 45.45        | 59.35                    | 53.41        | 10.67                          | NA   | 0.00  | 11.45 | 10.43 |

\* Based on 2001 Peer Mortgage Data: Southeast Region 1.

\*\* 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

| Geographic Distribution: HOME MORTGAGE REFINANCE |                                     |              |                        |              |                             |              |                           |              |                          |              |                                |      |      |      | Geography: FNBTC |  |  |  |  | Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002 |  |  |  |  |
|--|-------------------------------------|--------------|------------------------|--------------|-----------------------------|--------------|---------------------------|--------------|--------------------------|--------------|--------------------------------|------|------|------|------------------|--|--|--|--|---|--|--|--|--|
| 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 | Overall                        | Low  | Mod  | Mid  | Upp              |  |  |  |  |   |  |  |  |  |
| <b>Full Review:</b>                              |                                     |              |                        |              |                             |              |                           |              |                          |              |                                |      |      |      |                  |  |  |  |  |   |  |  |  |  |
| Fort Pierce-Port St. Lucie MSA                   | 1,735                               | 79.62        | 1.88                   | 0.29         | 11.32                       | 3.29         | 63.95                     | 67.90        | 22.85                    | 28.53        | 6.98                           | 1.30 | 6.44 | 6.88 | 7.54             |  |  |  |  |   |  |  |  |  |
| <b>Limited Review:</b>                           |                                     |              |                        |              |                             |              |                           |              |                          |              |                                |      |      |      |                  |  |  |  |  |   |  |  |  |  |
| Indian River County -NonMSA                      | 444                                 | 20.38        | NA                     | NA           | 2.78                        | 1.35         | 37.87                     | 39.64        | 59.35                    | 59.01        | 4.78                           | NA   | 5.56 | 4.41 | 5.01             |  |  |  |  |   |  |  |  |  |

\* Based on 2001 Peer Mortgage Data: Southeast Region 1.

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

**Table 5. Geographic Distribution of Multifamily Loans**

| Geographic Distribution: MULTIFAMILY                    |                         |              |                        |              |                             |              |                           |              |                          |              |                                |      |      |       |       |
|---|-------------------------|--------------|------------------------|--------------|-----------------------------|--------------|---------------------------|--------------|--------------------------|--------------|--------------------------------|------|------|-------|-------|
| Geography: FNBTC  |                         |              |                        |              |                             |              |                           |              |                          |              |                                |      |      |       |       |
| Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002 |                         |              |                        |              |                             |              |                           |              |                          |              |                                |      |      |       |       |
| MA/Assessment Area:                                     | Total Multifamily Loans |              | Low-Income Geographies |              | Moderate-Income Geographies |              | Middle-Income Geographies |              | Upper-Income Geographies |              | Market Share (%) by Geography* |      |      |       |       |
|   | #                       | % of Total** | % of MF Units***       | % BANK Loans | % MF Units***               | % BANK Loans | % MF Units***             | % BANK Loans | % MF Units***            | % BANK Loans | Overall                        | Low  | Mod  | Mid   | Upp   |
| <b>Full Review:</b>                                     |                         |              |                        |              |                             |              |                           |              |                          |              |                                |      |      |       |       |
| Fort Pierce-Port St. Lucie MSA                          | 16                      | 72.73        | 3.28                   | 0.00         | 9.29                        | 6.25         | 45.57                     | 62.50        | 41.85                    | 31.25        | 30.00                          | 0.00 | 0.00 | 40.00 | 50.00 |
| <b>Limited Review:</b>                                  |                         |              |                        |              |                             |              |                           |              |                          |              |                                |      |      |       |       |
| Indian River County -NonMSA                             | 6                       | 27.27        | NA                     | NA           | 1.95                        | 0.00         | 14.42                     | 50.00        | 83.63                    | 50.00        | 50.00                          | NA   | 0.00 | 33.33 | 66.67 |

\* Based on 2001 Peer Mortgage Data: Southeast Region 1.

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

**Table 6. Geographic Distribution of Small Loans to Businesses**

| Geographic Distribution: SMALL LOANS TO BUSINESSES      |                            |                          |                                |              |                                |              |                                |              |                                |              |  |      |      |      |      |
|---|----------------------------|--------------------------|--------------------------------|--------------|--------------------------------|--------------|--------------------------------|--------------|--------------------------------|--------------|--|------|------|------|------|
| Geography: FNBTC  |                            |                          |                                |              |                                |              |                                |              |                                |              |  |      |      |      |      |
| Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002 |                            |                          |                                |              |                                |              |                                |              |                                |              |  |      |      |      |      |
| MA/Assessment Area:                                     | Total Small Business Loans |                          | Low-Income Geographies         |              | Moderate-Income Geographies    |              | Middle-Income Geographies      |              | Upper-Income Geographies       |              | Market Share (%) by Geography <sup>*</sup> |      |      |      |      |
|   | #                          | % of Total <sup>**</sup> | % of Businesses <sup>***</sup> | % BANK Loans | % of Businesses <sup>***</sup> | % BANK Loans | % of Businesses <sup>***</sup> | % BANK Loans | % of Businesses <sup>***</sup> | % BANK Loans | Overall                                    | Low  | Mod  | Mid  | Upp  |
| <b>Full Review:</b>                                     |                            |                          |                                |              |                                |              |                                |              |                                |              |  |      |      |      |      |
| Fort Pierce-Port St. Lucie MSA                          | 1,076                      | 82.58                    | 3.34                           | 0.46         | 16.25                          | 27.51        | 58.18                          | 55.48        | 22.22                          | 16.54        | 4.13                                       | 0.00 | 6.16 | 4.26 | 3.35 |
| <b>Limited Review:</b>                                  |                            |                          |                                |              |                                |              |                                |              |                                |              |  |      |      |      |      |
| Indian River County -NonMSA                             | 227                        | 17.42                    | NA                             | NA           | 1.61                           | 1.76         | 42.91                          | 44.93        | 55.49                          | 53.30        | 1.90                                       | NA   | 0.00 | 1.90 | 2.13 |

<sup>\*</sup> Based on 2001 Peer Small Business Data: US&PR.

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2002).

**Table 7. Geographic Distribution of Small Loans to Farms**

| Geographic Distribution: SMALL LOANS TO FARMS           |                        |              |                        |              |                             |              |                           |              |                          |              |                                |      |      |       |      |
|---|------------------------|--------------|------------------------|--------------|-----------------------------|--------------|---------------------------|--------------|--------------------------|--------------|--------------------------------|------|------|-------|------|
| Geography: FNBTC  |                        |              |                        |              |                             |              |                           |              |                          |              |                                |      |      |       |      |
| Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002 |                        |              |                        |              |                             |              |                           |              |                          |              |                                |      |      |       |      |
| 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 | Overall                        | Low  | Mod  | Mid   | Upp  |
| <b>Full Review:</b>                                     |                        |              |                        |              |                             |              |                           |              |                          |              |                                |      |      |       |      |
| Fort Pierce-Port St. Lucie MSA                          | 25                     | 73.53        | 2.23                   | 0.00         | 11.05                       | 8.00         | 70.52                     | 60.00        | 16.20                    | 32.00        | 16.67                          | 0.00 | 0.00 | 18.75 | 0.00 |
| <b>Limited Review:</b>                                  |                        |              |                        |              |                             |              |                           |              |                          |              |                                |      |      |       |      |
| Indian River County -NonMSA                             | 9                      | 26.47        | NA                     | NA           | 2.19                        | 0.00         | 48.41                     | 66.67        | 49.40                    | 33.33        | 7.27                           | NA   | 0.00 | 7.41  | 7.14 |

\* Based on 2001 Peer Small Business Data: US&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 (2002).

**Table 8. Borrower Distribution of Home Purchase Loans**

| Borrower Distribution: HOME PURCHASE |                           | Geography: FNBTC |                      |                  |                           | Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002 |                         |                  |                        |                  | Market Share* |      |      |      |      |
|--------------------------------------|---------------------------|------------------|----------------------|------------------|---------------------------|---|-------------------------|------------------|------------------------|------------------|---------------|------|------|------|------|
| MA/Assessment Area:                  | Total Home Purchase Loans |                  | Low-Income Borrowers |                  | Moderate-Income Borrowers |   | Middle-Income Borrowers |                  | Upper-Income Borrowers |                  | Overall       | Low  | Mod  | Mid  | Upp  |
|                                      | #                         | % of Total**     | % Families***        | % BANK Loans**** | % Families***             | % BANK Loans****  | % Families***           | % BANK Loans**** | % Families***          | % BANK Loans**** |               |      |      |      |      |
| <b>Full Review:</b>                  |                           |                  |                      |                  |                           |   |                         |                  |                        |                  |               |      |      |      |      |
| Fort Pierce-Port St. Lucie MSA       | 1,838                     | 83.43            | 18.18                | 10.41            | 19.05                     | 17.28   | 23.65                   | 23.86            | 39.12                  | 48.45            | 6.22          | 6.63 | 4.73 | 6.03 | 7.04 |
| <b>Limited Review:</b>               |                           |                  |                      |                  |                           |   |                         |                  |                        |                  |               |      |      |      |      |
| Indian River County -NonMSA          | 365                       | 16.57            | 10.38                | 4.96             | 14.71                     | 14.88   | 20.35                   | 19.83            | 54.57                  | 60.33            | 3.56          | 3.47 | 3.41 | 4.22 | 3.38 |

\* Based on 2001 Peer Mortgage Data: Southeast Region 1.

\*\* As a percentage of loans with borrower income information available. No information was available for 1.54% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 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.



**Table 9. Borrower Distribution of Home Improvement Loans**

| Borrower Distribution: HOME IMPROVEMENT                 |                              |              |                      |                  |                           |                  |                         |                  |                        |                  |               |       |       |       |       |
|---|------------------------------|--------------|----------------------|------------------|---------------------------|------------------|-------------------------|------------------|------------------------|------------------|---------------|-------|-------|-------|-------|
| Geography: FNBTC  |                              |              |                      |                  |                           |                  |                         |                  |                        |                  |               |       |       |       |       |
| Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002 |                              |              |                      |                  |                           |                  |                         |                  |                        |                  |               |       |       |       |       |
| 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***             | % BANK Loans**** | % Families***           | % BANK Loans**** | % Families***          | % BANK Loans**** | Overall       | Low   | Mod   | Mid   | Upp   |
| <b>Full Review:</b>                                     |                              |              |                      |                  |                           |                  |                         |                  |                        |                  |               |       |       |       |       |
| Fort Pierce-Port St. Lucie MSA                          | 532                          | 85.81        | 18.18                | 13.32            | 19.05                     | 21.24            | 23.65                   | 27.22            | 39.12                  | 38.22            | 15.56         | 16.41 | 14.86 | 14.78 | 16.20 |
| <b>Limited Review:</b>                                  |                              |              |                      |                  |                           |                  |                         |                  |                        |                  |               |       |       |       |       |
| Indian River County -NonMSA                             | 88                           | 14.19        | 10.38                | 9.30             | 14.71                     | 18.60            | 20.35                   | 23.26            | 54.57                  | 48.84            | 10.45         | 15.79 | 7.89  | 12.50 | 9.64  |

\* Based on 2001 Peer Mortgage Data: Southeast Region 1.

\*\* As a percentage of loans with borrower income information available. No information was available for 2.58% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 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.

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

| Borrower Distribution: HOME MORTGAGE REFINANCE |                                     |              |                      |                  |                           |                  |                         |                  |                        |                  |               |       |      |      | Geography: FNBTC |  |  |  |  | Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002 |  |  |  |  |
|--|-------------------------------------|--------------|----------------------|------------------|---------------------------|------------------|-------------------------|------------------|------------------------|------------------|---------------|-------|------|------|------------------|--|--|--|--|---|--|--|--|--|
| 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***             | % BANK Loans**** | % Families***           | % BANK Loans**** | % Families***          | % BANK Loans**** | Overall       | Low   | Mod  | Mid  | Upp              |  |  |  |  |   |  |  |  |  |
| <b>Full Review:</b>                            |                                     |              |                      |                  |                           |                  |                         |                  |                        |                  |               |       |      |      |                  |  |  |  |  |   |  |  |  |  |
| Fort Pierce-Port St. Lucie MSA                 | 1,735                               | 79.62        | 18.18                | 13.18            | 19.05                     | 20.19            | 23.65                   | 26.90            | 39.12                  | 39.72            | 8.21          | 10.84 | 8.67 | 8.71 | 7.17             |  |  |  |  |   |  |  |  |  |
| <b>Limited Review:</b>                         |                                     |              |                      |                  |                           |                  |                         |                  |                        |                  |               |       |      |      |                  |  |  |  |  |   |  |  |  |  |
| Indian River County -NonMSA                    | 444                                 | 20.38        | 10.38                | 3.52             | 14.71                     | 12.91            | 20.35                   | 23.47            | 54.57                  | 60.09            | 5.79          | 10.75 | 4.28 | 5.79 | 5.80             |  |  |  |  |   |  |  |  |  |

\* Based on 2001 Peer Mortgage Data: Southeast Region 1.

\*\* As a percentage of loans with borrower income information available. No information was available for 3.85% of loans originated and purchased by BANK.

\*\*\* Percentage of Families is based on the 1990 Census information.

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

**Table 11. Borrower Distribution of Small Loans to Businesses**

| Borrower Distribution: SMALL LOANS TO BUSINESSES |                                 | Geography: FNBTC |   |                  | Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002 |                          |                            |               |                         |
|--|---------------------------------|------------------|---|------------------|---|--------------------------|----------------------------|---------------|-------------------------|
| 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 |
| <b>Full Review:</b>                              |                                 |                  |   |                  |   |                          |                            |               |                         |
| Fort Pierce-Port St. Lucie MSA                   | 1,076                           | 82.58            | 63.69   | 47.12            | 80.76   | 9.01                     | 10.22                      | 4.13          | 4.49                    |
| <b>Limited Review:</b>                           |                                 |                  |   |                  |   |                          |                            |               |                         |
| Indian River County -NonMSA                      | 227                             | 17.42            | 64.69   | 50.22            | 79.30   | 8.37                     | 12.33                      | 1.90          | 2.18                    |

\* Based on 2001 Peer Small Business Data: US&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 - 2002).

\*\*\*\* 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 27.71% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

| Borrower Distribution: SMALL LOANS TO FARMS |                            | Geography: FNBTC |  |                  | Evaluation Period: JANUARY 1, 2000 TO DECEMBER 31, 2002 |                          |                            |               |                         |
|---|----------------------------|------------------|--|------------------|---|--------------------------|----------------------------|---------------|-------------------------|
| 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 |
| <b>Full Review:</b>                         |                            |                  |  |                  |   |                          |                            |               |                         |
| Fort Pierce-Port St. Lucie MSA              | 25                         | 73.53            | 89.72                                      | 56.00            | 84.00   | 0.00                     | 16.00                      | 16.67         | 18.75                   |
| <b>Limited Review:</b>                      |                            |                  |  |                  |   |                          |                            |               |                         |
| Indian River County -NonMSA                 | 9                          | 26.47            | 87.65                                      | 66.67            | 88.89   | 11.11                    | 0.00                       | 7.27          | 13.64                   |

\* Based on 2001 Peer Small Business Data: US&amp;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&amp;B - 2002).

\*\*\*\* 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 14.71% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

| QUALIFIED INVESTMENTS                            |                           |           |                            |           |                   |           |            |                        |           |
|--|---------------------------|-----------|----------------------------|-----------|-------------------|-----------|------------|------------------------|-----------|
| Geography: FNBTC                                 |                           |           |                            |           |                   |           |            |                        |           |
| Evaluation Period: MAY 1, 2000 TO AUGUST 4, 2003 |                           |           |                            |           |                   |           |            |                        |           |
| MA/Assessment Area:                              | Prior Period Investments* |           | Current Period Investments |           | Total Investments |           |            | Unfunded Commitments** |           |
|  | #                         | \$(000's) | #                          | \$(000's) | #                 | \$(000's) | % of Total | #                      | \$(000's) |
| <b>Full Review:</b>                              |                           |           |                            |           |                   |           |            |                        |           |
| Fort Pierce-Port St. Lucie MSA                   | 4                         | 1,962     | 94                         | 467       | 98                | 2,429     | 97.00      | 3                      | 47        |
| <b>Limited Review:</b>                           |                           |           |                            |           |                   |           |            |                        |           |
| Indian River County – NonMSA                     | 0                         | 0         | 45                         | 71        | 45                | 71        | 3.00       | 0                      | 0         |

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

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

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

| DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS |                                |                    |                                |   |       |       |       |                          |                      |   |     |     |     |                                       |       |       |       |
|---|--------------------------------|--------------------|--------------------------------|---|-------|-------|-------|--------------------------|----------------------|---|-----|-----|-----|---------------------------------------|-------|-------|-------|
| Geography: FNBTC  |                                |                    |                                |   |       |       |       |                          |                      |   |     |     |     |                                       |       |       |       |
| Evaluation Period: MAY 1, 2000 TO AUGUST 4, 2003                    |                                |                    |                                |   |       |       |       |                          |                      |   |     |     |     |                                       |       |       |       |
| MA/Assessment Area:   | Deposits                       | Branches           |                                |   |       |       |       | Branch Openings/Closings |                      |   |     |     |     | Population                            |       |       |       |
|   | % of Rated Area Deposits in AA | # of BANK Branches | % of Rated Area Branches in AA | Location of Branches by Income of Geographies (%) |       |       |       | # of Branch Openings     | # of Branch Closings | Net change in Location of Branches (+ or -) |     |     |     | % of Population within Each Geography |       |       |       |
|   |                                |                    |                                | Low   | Mod   | Mid   | Upp   |                          |                      | Low   | Mod | Mid | Upp | Low                                   | Mod   | Mid   | Upp   |
| <b>Full Review:</b>   |                                |                    |                                |   |       |       |       |                          |                      |   |     |     |     |                                       |       |       |       |
| Fort Pierce-Port St. Lucie MSA                                      | 84.00                          | 19                 | 73.00                          | 5.26  | 15.79 | 63.16 | 15.79 | 3                        | 1                    | 0   | 0   | +2  | 0   | 5.99                                  | 11.92 | 62.59 | 19.49 |
| <b>Limited Review:</b>  |                                |                    |                                |   |       |       |       |                          |                      |   |     |     |     |                                       |       |       |       |
| Indian River County -NonMSA   | 16.00                          | 7                  | 27.00                          | NA  | 0.00  | 42.86 | 57.14 | 0                        | 0                    | NA  | 0   | 0   | 0   | NA                                    | 4.87  | 42.27 | 52.86 |