

PUBLIC DISCLOSURE

October 14, 1997

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**SunTrust Bank, Tallahassee, N.A.
Charter Number 18089**

**3522 Thomasville Road
Tallahassee, Florida 32308**

**Office of the Comptroller of the Currency
Large Bank Supervision
250 E. Street, SW
Washington, DC 20219**

NOTE: This evaluation is not, nor should it 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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GENERAL INFORMATION

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

This document is an evaluation of the Community Reinvestment Act (CRA) performance of **SunTrust Bank, Tallahassee, N.A.** (STB-Tallahassee) prepared by **The Office of the Comptroller of the Currency**, the institution's supervisory agency, as of **October 14, 1997**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 C.F.R. Part 25.

INSTITUTION

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory Record of Meeting Community Credit Needs**.

The following are the primary factors supporting STB-Tallahassee's performance under the Lending, Investment, and Service Tests.

Lending Test

- A high percentage of the bank's loans were made within its assessment areas. In 1997, 83% of HMDA loans, 96% of small business loans, and 90% of consumer loans were made inside STB-Tallahassee's assessment area.
- The level of lending in low and moderate-income tracts is less than adequate when compared to the family and housing demographics for those tracts.
- The bank's lending to borrowers of different income levels and businesses of different sizes reflected adequate performance. The bank was an active lender to small businesses in 1996.
- STB-Tallahassee provided \$4.3 million in loans for multi-family housing with affordable rents which was a significant credit need in the community. The bank also

participated in a local consortium affordable housing lending program.

Investment Test

- The bank has a limited, but adequate level (\$262 thousand) of qualified investments. The bank has not used innovative or complex investments. The bank has been generally responsive to the credit and community development needs in its assessment area.

Service Test

- Branch and automated teller machine (ATM) delivery systems are reasonably accessible to geographies and individuals of different income levels in its assessment area.
- The bank's services, including business hours, do not vary in a way that inconveniences its assessment area, particularly LMI geographies and LMI individuals. In fact, lobby hours and operations have been tailored to better serve the community.
- The bank has not closed any branches since the last examination. It has opened one branch in an upper income tract and one branch on the campus of Florida State University (FSU). While no branches are located in LMI census tracts, two of the bank's branches are located within close proximity to a significant portion of the LMI tracts in the assessment areas.
- The bank provides an adequate level of community development services.

The following table indicates the performance level of STB-Tallahassee, with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	<u>SUNTRUST BANK, Tallahassee, N.A.</u>		
	PERFORMANCE TESTS		
	Lending Test¹	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
Needs to Improve			
Substantial Noncompliance			

¹ The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

DESCRIPTION OF INSTITUTION AND ASSESSMENT AREA

STB-Tallahassee is a subsidiary of SunTrust Banks, Inc. (STI), a \$56 billion institution headquartered in Atlanta, Georgia. STI ranks among the top twenty banking companies in the nation and operates financial institutions in Georgia, Florida, Tennessee, and Alabama. STB-Tallahassee, with total reported assets of \$494 million as of June 30, 1997, operates seven branch offices and four off-site ATMs in Leon County. The bank offers a wide range of loan products. The table below shows a breakdown of STB-Tallahassee's major loan categories and the amount outstanding as of June 30, 1997.

Outstanding Loans as of June 30, 1997		
Type	Amount (\$million)	%
1-4 Family Residential	235	58
Other Real Estate	100	25
Commercial	28	7
Consumer	39	9
Other	2	1
TOTAL	404	100

Source: June 30, 1997 Call Report

The bank acquired the former Andrew Jackson Savings and Loan (S&L) in 1994 which more than doubled STB-Tallahassee's size. As a result of the acquisition, and as shown in the above table, the bank acquired a substantial real estate portfolio. Per bank management, the assimilation of the larger financial institution has required significant resources and a restructuring of the bank's lending staff because of high turnover. However, there are no legal, financial, or other reasons that would impede the bank's ability to meet the credit needs of its assessment areas.

Competition in the bank's assessment area is strong. There are approximately 40 deposit taking financial institutions with branches in the bank's assessment area, twelve of which are commercial banks insured by the FDIC. STB-Tallahassee is the third largest commercial bank in the assessment area with a deposit market share of approximately 16%. There were 173 Home Mortgage Disclosure Act (HMDA) lenders in Leon County during 1995.

STB-Tallahassee’s assessment area consists of Leon County which is the larger of the two counties comprising the Tallahassee Metropolitan Statistical Area (MSA). Tallahassee, which is the county seat for Leon County and the capital of Florida, has a very large government-based economy. The local economy is further influenced by two major universities located in the city, Florida State University (FSU) and Florida A&M University (FAMU), and the much smaller Tallahassee Community College. Unemployment has consistently been lower than both state and national levels. The population is generally young, well educated, and affluent. Persons over 65 years old comprise 8% of Leon County’s population. This compares to 18% for the state of Florida. The Tallahassee MSA HUD estimated 1997 median family income is \$44,100, which compares to the state non-MSA median family income of \$32,500. Additional demographic data for Leon County is detailed below.

Assessment Area Demographic Data Distribution by Census Tract Income Level										
	Low		Moderate		Middle		Upper		Total*	
	#	%	#	%	#	%	#	%	#	%
Census Tracts*	6	15	7	18	15	37	12	30	40	100
Families (000)	3	6	7	15	18	40	18	39	46	100
Households	7	9	15	20	30	40	23	31	75	100
Population (000)	17	9	36	19	73	38	62	32	192	100

* Totals do not include data from two tracts (13.00 and 28.98) which are not classified in terms of income by the 1990 census. Florida State University is located in tract 13.00 and there are only 12 housing units in the tract. Tract 28.98 is uninhabited. Source: 1990 Census Data, U.S. Bureau of the Census

The median housing value for the Tallahassee, Florida MSA is \$59,450 and the median year built is 1974. A large majority of the housing units are located in middle and upper income tracts as shown on the following table. While most of the housing units in the middle and upper income tracts are owner-occupied, the same is not the case for the low- and moderate-income (LMI) tracts, where a smaller percentage of the units are owner-occupied. The table also demonstrates that a large majority of the multi-family housing units are located in the LMI tracts.

Housing Stock Demographics						
Tract Income Level	# of Units	% Owner Occupied	% Rental Units	% Vacant Units	TOTAL	% Multi-Family Units
Low Income	7,912	22	64	14	100	43
Moderate Income	16,540	32	57	11	100	32
Middle Income	32,306	55	38	7	100	15
Upper Income	24,555	72	23	5	100	8
TOTAL	81,313					100

Source: 1990 Census Data, U.S. Bureau of the Census

Both FSU and FAMU are located in or near the heart of the City of Tallahassee and are bordered by LMI tracts. Both of these universities continue to grow and the student population absorbs much of the available lower cost housing units - particularly older units. There is very little inventory of vacant land in the central urban area of the city making the construction of new affordable housing expensive and therefore difficult.

To better understand the demographics and credit needs of the assessment area, we reviewed the U.S. Department of Housing and Urban Development (HUD) 1995 Consolidated Strategy and Plan for the city of Tallahassee. HUD Consolidated Strategies and Plans are comprehensive planning documents that identify community needs by using input from all segments of the community. The HUD plan detailed that while the population of Leon County increased by 50% from 1980 to 1990, the number of LMI households increased by 63%. Of the county's 75 thousand households, 17% are below the poverty level. The plan estimates that only 22% of available housing stock in the City of Tallahassee is considered "affordable." The HUD plan estimates that there is a need for over 2,400 additional affordable units in the City of Tallahassee.

Multi-family housing occupancy trends reveal a growing need. Occupancy levels have risen gradually but steadily over the past decade and for 1995 totaled 97%, as reported by the Tallahassee-Leon County Planning Commission.

We also met with two community representatives during this examination pertaining to housing and small business needs. From the foregoing reports and meetings we determined that the most significant credit related needs in the bank's assessment area include the following:

- Affordable housing (i.e., single family rental, multifamily rental, home ownership, and home rehabilitation) for low income individuals and the elderly.
- Education pertaining to financial services such as home buying seminars, credit

counseling, and small business counseling.

- Small business lending.

STB-Tallahassee received a rating of “Outstanding” at the last CRA examination, dated December 6, 1995. This examination covers STB-Tallahassee’s performance from January 1, 1996 to June 30, 1997.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Lending Test

Our review of STB-Tallahassee's lending performance focused on HMDA, small business and consumer loans. The bank elected to provide consumer loan data for our review. There are very few small farms operating in Leon County (110 per Dun & Bradstreet, Inc. business data). The bank's branch structure is centered around the urban area of Tallahassee. The bank had made only one farm loan totaling \$150,000 in 1996 and renewed the same credit in 1997.

Assessment Area Concentration

A high percentage of STB-Tallahassee's loans were made within its assessment area. In 1997, 83% of HMDA loans, 96% of small business loans, and 90% of consumer loans were made inside STB-Tallahassee's assessment area (AA). The bank was also successful in slightly increasing the ratio of loans made within its assessment area in every category from 1996 to 1997.

Ratio of Loans Inside the Bank's Assessment Area (AA)								
	HMDA		Small Business		Consumer		Total	
	1996	YTD 1997	1996	YTD 1997	1996	YTD 1997	1996	YTD 1997
Number								
# of Loans Inside AA	392	188	261	94	552	178	1,205	460
% of Loans Inside AA	79%	83%	93%	96%	86%	90%		
Dollars (000's)								
\$ of Loans Inside AA	39,857	17,945	23,414	8,185	13,858	5,655	77,129	31,785
% of Loans Inside AA	73%	82%	94%	94%	85%	95%		

Source: HMDA Loan Application Register and Bank prepared Small Business and Consumer Loan Data Collection Register

Lending Activity

STB-Tallahassee's level of lending is considered adequate and generally responsive to the identified credit need for affordable housing. STB-Tallahassee's volume of HMDA lending has declined since 1995 when a total of 708 HMDA loans were granted. Soon after the acquisition of the S&L in 1994, the major mortgage lenders (that came to the bank via the acquisition) left to form a newly chartered bank. Over the course of 1995 and 1996, the new bank attracted many of the mortgage lenders from STB-Tallahassee causing the decline in volume. The decline has stabilized as annualized 1997 home purchase originations approximate the 1996 volume. On the positive side, home improvement loans are up significantly over 1996.

Number and Dollar Amount of HMDA Loans								
	1996				Y-T-D 1997			
	#	%	\$	%	#	%	\$	%
Home Purchase	351	71	38,953	71	164	72	16,564	76
Refinance	134	27	15,180	28	33	15	4,439	20
Home Improvement	12	2	311	1	29	13	868	4
Multifamily	0	0	0	0	0	0	0	0
Total	497	100%	54,444	100%	226	100%	21,871	100%

Source: HMDA Loan Application Register

Geographic Distribution

STB-Tallahassee's geographic distribution of HMDA, small business, and consumer loans reflects a less than adequate penetration in the LMI tracts in its assessment areas. While the bank had granted loans in every census tract in its assessment area, the level of lending to LMI tracts was considered low. The only lending product where the bank had adequate penetration was small business lending, and this penetration was reasonable only for moderate income tracts.

As shown in the following table, the level of HMDA lending in low and moderate income tracts is low in comparison to the percentage of families living in those tracts and the percentage of owner-occupied housing in the tracts. In 1996 only 1% of the number of STB-Tallahassee's HMDA loans were in low income tracts compared to 6% of the families in the AA living in those tracts and 4% of the owner-occupied housing units located in those tracts. STB-Tallahassee's lending in moderate income tracts did not compare much better as only 5% of the number of STB-Tallahassee's HMDA loans were in moderate income tracts compared to

15% of the families in the AA living in those tracts and 13% of the owner occupied housing units located in those tracts. Similar results were noted in the 1997 HMDA loan data.

Distribution of HMDA Loans by Census Tract Income Designation											
Tract Designation	% of Tracts	% Families by Tract	% Owner Occupied Housing by Tract	1996				YTD 1997			
				#	%	\$ (000)	%	#	%	\$ (000)	%
Low Income	15	6	4	3	1	141	nil	2	1	103	nil
Moderate Income	18	15	13	21	5	1,327	3	12	6	679	4
Middle Income	37	40	41	131	33	10,987	28	71	38	5,884	33
Upper Income	30	39	42	237	61	27,402	69	103	55	11,279	63
Total	100	100	100	392	100	39,857	100	188	100	17,945	100

* Does not include loans made in census tracts classified as NA (13.00 and 28.98)

Source: 1990 Census Data, U.S. Bureau of the Census and HMDA Loan Application Register

The following table shows the distribution of consumer lending, within the bank's assessment area, based on the geographic location of the borrower. As shown in the table, the bank's level of granting loans to individuals residing in LMI areas is less than the corresponding composition of those areas. While 21% of the families reside in LMI areas, the bank has extended 10% or less of their consumer loans to these individuals. The table also shows that consumer lending has significantly declined in 1997 (annualized) compared to 1996 levels. This decline was caused primarily by the bank discontinuing its indirect lending program (the purchase of consumer automobile loans originated by automobile dealers.)

Geographic Distribution of Consumer Loans									
Tract Income Level	% of Families Residing in Tract	1996				YTD 1997			
		#	%	\$(000)	%	#	%	\$(000)	%
Low Income	6	5	1	233	2	5	3	221	4
Moderate Income	15	38	7	553	4	8	4	326	6
Middle Income	40	190	34	4,725	34	58	33	1,618	29
Upper Income	39	319	58	8,347	60	105	59	3,470	61
Not Available	-	0	0	0	0	2	1	20	nil
Total	100%	552	100%	13,858	100%	178	100%	5,655	100%

Source: 1990 Census Data, U.S. Bureau of Census and Bank prepared Consumer Loan Data Collection Register

The bank also granted 955 credit card loans within its assessment area during 1996 that are not included in the above table. Of these loans, 3% were in low income, 6% in moderate income, 35% in middle income and 56% in upper income tracts. The bank changed its computer servicer, and bank management was not able to provide data on 1997 credit card lending for comparison purposes.

The following table shows the geographic distribution of the bank's small business lending and compares it to the ratio of businesses located in those areas.

Geographic Distribution of Small Business Loans - 1996 and YTD 1997						
Tract Income Level	% of Tracts	% of Businesses by Location	Small Business Loans by Location			
			1996		YTD 1997	
			#(%)	\$(%)	#(%)	\$(%)
Low Income	15	7	3	2	1	3
Moderate Income	18	20	19	18	16	11
Middle Income	37	41	39	44	39	41
Upper Income	30	32	39	36	44	45
Total	100%	100%	100%	100%	100%	100%

Source: 1990 Census Data, U.S. Bureau of the Census and Bank prepared Small Business Data Collection Register

As shown in the above table, the bank's level of lending in low income tracts, for both 1996 and 1997, is not proportional to the number of businesses residing in those tracts. While the bank's 1996 lending to businesses located in moderate income tracts approximated the ratio of businesses operating in those tracts, 1997 lending ratios declined from 1996.

Distribution by Borrower Characteristics

STB-Tallahassee's has an adequate distribution of HMDA, small business, and consumer loans to borrowers of different income levels and businesses of different sizes. As shown in the following table, 6% of total HMDA loans were to low income individuals in 1996. Furthermore, the ratio declined to 2% in 1997. Although 18% of all families in Leon County are considered low income, the bank's lower distribution to this segment is somewhat justified based on the fact that 17% of the households in the assessment area are below the poverty level. The high poverty rate significantly decreases the number of individuals who are able to qualify for a home loan. The bank's level of lending to moderate income individuals exceeded the demographics and increased slightly from 1996 to 1997 which indicates a strong level of

performance.

Distribution of HMDA Loans by Borrower Income Level					
Income Level	% of Families in Assessment Area	1996		1997	
		#	%	#	%
Low Income	18	22	6	4	2
Moderate Income	16	79	20	39	21
Middle Income	22	86	22	41	22
Upper Income	43	195	50	101	54
Not Available	nil	10	2	3	1
Total	100%	392	100%	188	100%

Source: 1990 Census Data, U.S. Bureau of the Census and HMDA Loan Application Register

The following table shows the bank's distribution of consumer loans by borrower income level. As shown in the table, the bank has a reasonable distribution of loans among the income groups in its assessment area. The table also shows that the trend is positive, with the performance for 1997 improving on 1996.

Distribution of Consumer Loans by Borrower Income Level					
Income Level	% of Families in Assessment Area	1996		Y-T-D 1997	
		#	%	#	%
Low Income	18	50	9	17	10
Moderate Income	16	74	13	27	15
Middle Income	22	92	17	31	17
Upper Income	43	333	60	100	56
Not Available	nil	3	1	3	2
Total	100%	552	100%	178	100%

Source: 1990 Census Data, U.S. Bureau of the Census and Bank prepared Small Business Data Collection Register

As with the table showing the Geographic Distribution of Consumer Loans, the above table does not include 955 credit card loans made during 1996. Of these loans, 21% were to low income, 21% to moderate income, 21% to middle income, and 28% to upper income

borrowers (9% were to borrowers who did not disclose their income.) This represents a high level of lending to LMI borrowers.

The following table shows the distribution of small business loans by loan size in the bank's assessment area.

Distribution of Small Business Loans by Loan Size								
Loan Size	1996				YTD 1997			
	#	%	\$(000)	%	#	%	\$(000)	%
Less than \$100,000	206	79	8,326	36	64	68	2,145	26
Between \$100,000 and \$250,000	40	15	6,802	29	25	27	3,882	48
Greater than \$250,000	15	6	8,286	35	5	5	2,158	26
Total	261	100%	23,414	100%	94	100%	8,185	100%

Source: 1990 U.S. Census Data, U.S. Bureau of the Census and Bank prepared Small Business Data Collection Register

As shown in the above table, the bank has a good distribution of loans by size. Additionally, of the total business loans made in 1996 and 1997, 68% and 71% respectively were to businesses with less than \$1 million in revenues. The bank is effectively lending to small businesses. Loan production for 1997 is down because of high turnover in the lending area.

Community Development Lending

As discussed in the community profile section of this evaluation, the primary community development need in Leon County is affordable housing. The bank has extended five loans totaling \$4.3 million for multi-family housing with rents that can be considered affordable. None of the multi-family housing units are located in LMI tracts, although two of the units are in very close proximity to LMI tracts. Average annual rents in two of the units are very low and are affordable for low income households.

Flexible or Innovative Lending Practices

STB-Tallahassee participates in the Tallahassee Lender's Consortium, Inc. (TLC) which assists LMI applicants in qualifying for and obtaining credit for the purchase of affordable housing. The program offers 97% financing with a 30-year fixed rate. The consortium provides an average assistance of \$3,500 per borrower and covers the home buyer's closing costs. The city of Tallahassee guarantees the top 25% of each loan. Eight of the twelve commercial banks in the Tallahassee area are active in the consortium. The member banks take turns receiving applications from the consortium unless an applicant has requested a specific

financial institution. With the help of the consortium, applicants have a very high approval rate. The consortium generated approximately 170 loans during the time frame covered by this evaluation. STB-Tallahassee originated 22 of those loans totaling \$1.2 million.

Another example of flexible lending occurred during early 1996. STB-Tallahassee was financing four loans approved under the TLC program all of which were to LMI applicants. All four borrowers were using the same builder who began experiencing significant financial difficulties. The bank provided the borrowers with legal counsel and, instead of foreclosing on the partially completed houses, worked with the borrowers in an attempt to complete the houses. One borrower decided to deed the house to the bank, one borrower passed away during the process and the remaining two borrowers successfully completed their houses. The bank absorbed \$5,628 in cost overruns on the two completed houses, forgave interest to all borrowers totaling \$3,550 and devoted resources totaling \$9,705 to the entire process.

Investment Test

Qualified Investments

The following table shows the number and amount of qualified investments made by STB-Tallahassee and represents an adequate level of investments. The qualified investments include grants and contributions made to organizations which meet the general requirements of community development as defined in the Appendix section of the evaluation.

COMMUNITY DEVELOPMENT INVESTMENTS			
Type	Geographic Area	Number	Dollars
Investments:			
Florida Community Loan Fund	State of Florida	1	\$250,000
Grants/Contributions:			
Southern Scholarship Foundation	Leon County	1	1,000
Consumer Credit Counseling	Leon County	1	500
Habitat for Humanity	Leon County	1	1,000
Tallahassee Lender's Consortium	City of Tallahassee	2	6,000
Florida Housing Coalition	City of Tallahassee	2	100
Tallahassee Urban League	City of Tallahassee	2	1,500

COMMUNITY DEVELOPMENT INVESTMENTS			
United Way	Leon County	2	1,395
Northwest Florida Black Business Investment Corp.	Leon County	1	500
Totals		13	\$261,995

The Florida Community Loan Fund (FCLF) was organized to provide funding for nonprofit organizations across the state of Florida. The nonprofit obtaining funding from the FCLF must be engaged in community development or redevelopment activities. The primary focus of the FCLF is to expand access to housing for low-income and disadvantaged households. STB-Tallahassee's investment is for a term of three years and carries a lower than market interest rate of 3%. Additional information on the above organizations follows:

Southern Scholarship Foundation - provides housing for low income students.

Consumer Credit Counseling - provides credit counseling to low income borrowers.

Habitat for Humanity - provides affordable housing for low income families.

Tallahassee Lenders Consortium - facilitates affordable housing for LMI applicants.

Florida Housing Coalition - provides training to local governments and non-profit organizations to assist them in developing affordable housing programs.

Tallahassee Urban League - provides community development, housing assistance and credit counseling to first time home buyers. Per bank management, approximately 60% of their budget is devoted to low income housing initiatives.

United Way - provides a wide array of community support programs. The bank's total contribution for 1996 and 1997 was \$9,000. However, credit was only given for approximately 15.5% of their budget used for educational and job skills.

Northwest Florida Black Business Investment Corp. - a non-profit organization which provides seed money to minority owned, small businesses.

Service Test

Accessibility of Delivery Systems

STB-Tallahassee's branch and ATM delivery systems are reasonably accessible to geographies and individuals of different income levels in its assessment area.

Although STB-Tallahassee does not have branches or ATMs in LMI tracts, two of the bank's branches are located within close proximity to a significant portion of the assessment area's

LMI tracts.

Distribution of Branch Offices and ATM's								
Tract Income Designation	Census Tracts		Population (ooo)		Branches		Off-Site ATM's	
	#	%	#	%	#	%	#	%
Low Income	6	14	17	9	0	0	0	0
Moderate Income	7	17	36	19	0	0	0	0
Middle Income	15	36	73	38	2	29	0	0
Upper Income	12	29	62	32	4	57	0	0
Uninhabited	2	5	4	2	1	14	4	100
Total	42	100%	193	100%	7	100%	4	100%

Source: 1990 Census Data, U.S. Bureau of the Census and Bank supplied information

The bank's services, including business hours, do not vary in a way that inconveniences its assessment area, particularly LMI geographies and LMI individuals. In fact, lobby hours and operations have been tailored to better serve the community.

The bank provides an adequate level of community development services.

Changes in Branch Locations

STB-Tallahassee has not closed any branches since the last evaluation and therefore the accessibility of its services to low or moderate income individuals or geographies has not been adversely affected. However, the bank has opened two branches, one of which is located in an upper income census tract. The other branch is located on the Florida State University (FSU) campus which is located in an uninhabited tract per census designation. The campus branch is in close proximity to and bordered on all sides by low and moderate income census tracts but almost exclusively serves the FSU community.

Alternative Delivery Services

STB-Tallahassee provides loan-by-phone as an alternative delivery system. The loan-by-phone program for mortgage loans is called "Step 1", and it has been only minimally successful in developing alternative loan customers. Since April 1, 1996, the bank has received 61 calls under this program that resulted in one loan totaling \$134,000 to an upper income applicant. The bank does not maintain data on the income level or location of the calls which do not

result in loans.

Community Development Services

STB-Tallahassee provides community development services within its assessment area. The bank's community development services have primarily related to affordable housing initiatives. Examples of these are discussed below.

- ▶ Tallahassee Lenders Consortium (TLC): TLC is a consortium of banks working with the City of Tallahassee to provide financial education and credit counseling service as well assist low- and moderate-income individuals in obtaining affordable home ownership. The City of Tallahassee provides down payment assistance for qualified borrowers and the consortium of banks provide affordable long-term financing. An STB-Tallahassee representative serves on the Board of Directors and other STB-Tallahassee banking executives provide ongoing technical expertise.
- ▶ Southern Scholarship Foundation (SSF): SSF raises funds to build and provide housing for students from low-income families. To qualify, the individual must be a full-time student and meet financial need requirements. The housing facilities are located between the Florida State University and Florida A&M University campuses. In 1996, SSF provided housing for 352 students. The STB-Tallahassee Chief Executive Officer is a member of the Board of Directors as well as sits on the Executive Committee.
- ▶ Millennium Project 2000 (MP): MP is an affordable housing initiative in Leon County to provide 2000 affordable housing units by the year 2000. MP is the process of linking builders with qualified home buyers. STB-Tallahassee is one of two financial institutions that helped create MP. An STB-Tallahassee representative as well as the bank's CRA marketing consultant are participants in the project providing technical guidance and assistance.
- ▶ Habitat for Humanity (HFH): HFH's main purpose is to provide affordable housing for low-income families. In 1996, HFH with the Florida Banker's Association built a home in Tallahassee, nicknamed the "Bankers House." All local banks participated both financially and with employee resources to build the house. An STB-Tallahassee representative also sat on the steering committee which was responsible for organizing, budgeting and coordinating the effort.
- STB-Tallahassee conducted ten Homebuyers' Workshops and participated in three workshops sponsored by TLC. A total of 382 people, from low, moderate, middle, and upper income tracts in the community, attended these workshops.

Fair Lending Review

No violations of the substantive provisions of the anti-discrimination laws or regulations were

identified. STB-Tallahassee's fair lending policies, procedures, training programs, and internal self-assessments are satisfactory.

APPENDIX

Definition of Terms

The following are definitions of terms used throughout this public evaluation. The definitions are not the strict legal definitions contained in 12 C.F.R. 25.12, but rather a more concise synopsis of their meaning.

Community Development - The primary purpose of the loan, investment, or service is for (1) affordable housing for low or moderate income individuals; (2) community services targeted to low or moderate income individuals; (3) activities that promote economic development by financing small businesses and farms; and (4) activities that revitalize or stabilize low or moderate income areas.

HMDA Loan - A residential real estate loan (home purchase, home refinance, home improvement, or multifamily)

Geography - A census tract or block numbering area.

Low, Moderate, Middle, and Upper Income Area - A low income area is one in which the median family income is less than 50% of the area median income, moderate income is 50% to 79% of the area median family income, middle income is 80% to 119% of the area median family income, and upper income is 120% or more of the area median family income.

Qualified Investment - A lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Small Business Loan - A commercial loan with an original loan amount of \$1 million or less.

Small Farm Loan - A farm loan with an original loan amount of \$500,000 or less.