



INTERMEDIATE SMALL BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

February 17, 2009

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Fidelity Bank of Florida, National Association
Charter Number: 24496

1380 North Courtenay Parkway
Merritt Island, FL 32953-0000

Office of the Comptroller of the Currency

North Florida Field Office
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Jacksonville, FL 32256

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

INSTITUTION'S CRA RATING: This institution is rated Outstanding

The Lending Test is rated: Outstanding.

The Community Development Test is rated: Outstanding.

- Fidelity Bank of Florida, National Association's average loan-to-deposit ratio is excellent in comparison to peer group averages.
- The bank makes a majority of loans within its assessment area.
- The bank's lending activities reflect excellent penetration among businesses of different sizes.
- The geographic distribution of business lending is excellent.
- Overall, the Community Development Test Rating is outstanding and reflects a strong level of responsiveness to community needs of the assessment area.

DESCRIPTION OF INSTITUTION

Fidelity Bank of Florida, National Association (FBNA) is an intrastate bank headquartered in Merritt Island, Florida in Brevard County. The bank has branch offices in Port Richey, Florida in Pasco County and Longwood, Florida in Orange County. The bank was chartered by the Comptroller of the Currency in April 2004. The bank was formerly chartered by the Federal Deposit Insurance Corporation (FDIC) under the name of Fidelity Bank of Florida.

The bank does not offer automated teller machine (ATM) access at any locations, but the bank offers Master Card debit cards and ATM debit cards. Other banking services include drive-up facilities at all offices and online banking.

FBNA offers a variety of lending products. The bank's primary product is commercial real estate loans. As of December 31, 2008, non-farm non-residential real estate and other business lending represented approximately 89% of the loan portfolio. As of year-end 2008, the bank had total assets of approximately \$412 million with net loans accounting for 88% of total assets. There are no financial, legal or regulatory constraints that would prevent the bank from meeting the credit needs of the community.

DESCRIPTION OF ASSESSMENT AREAS

Description of the Tampa-St. Petersburg-Clearwater Assessment Area - Metropolitan Statistical Area (MSA) 45300

This assessment area (AA), which is located on the west coast of Florida, includes all of Hillsborough, Pasco, Hernando and Pinellas Counties. FBNA has one branch in Port Richey, which was opened in 2007. Specific 2007 demographic data and economic data for the assessment area are listed below in Table 1.

Table 1 - Demographic and Economic Characteristics of the Tampa-St. Petersburg-Clearwater AA (Hillsborough, Pinellas, Hernando and Pasco Counties)		
Population	2,395,997	
Number of Families	641,369	
Number of Households	1,009,792	
Median Family Income (MFI):	\$56,500	
*Unemployment rate	8.3%	
Number and Percent of Census Tracts in the AA:		
Low-Income Census Tracts	16	2.93%
Moderate-Income Census Tracts	141	25.78%
Middle-Income Census Tracts	248	45.34%
Upper-Income Census Tracts	142	25.96%
Total	547	100%
Number and Percent of Businesses in the AA:		
Low-Income Census Tracts	4,052	1.66%
Moderate-Income Census Tracts	60,479	24.82%
Middle-Income Census Tracts	105,059	43.11
Upper-Income Census Tracts	74,126	30.41
Total	243,716	100%

*Source: 2000 Census, 2008 HUD updated income data (MFI), *US Bureau of Labor Statistics-Not Seasonally Adjusted-Dec 2008*

According to Florida Enterprise, this MSA forms the western edge of the Florida High Tech Corridor; the MSA boasts several developed high tech clusters including nanotechnology, aviation/aerospace and homeland security/defense. Tampa and St. Petersburg are two of the most populous cities in Florida, providing a large labor force, in addition to a large market for products and services.

The MSA provides a large education labor pool of more than 1.3 million individuals. This large labor force has experienced steady growth during the past ten years, growing by 16%. Of residents age 25 or older, more than 85% have at least a high school education, while nearly 25% possess at least a bachelor's degree. The University of South Florida (USF), located in Tampa, is the largest provider of higher education in the MSA. With an enrollment of more than 44,000, USF is the 3rd largest university in Florida, and the 9th largest in the nation based on the number enrollment. In addition to USF, three community colleges provide associate degree or associate/bachelor degree programs in the MSA.

The MSA is also home to the largest financial services cluster in the state, ranked 20th in the nation in terms of domestic employment. The primary industries are trade/transportation/utilities, education/health services, leisure & hospitality and professional/business. The largest employers are Hillsborough County School District, Verizon Communications, University of South Florida and Tampa International Airport. Finally, the United States Central Command, which directs military operations in Afghanistan, Iraq, and the Middle East, is based in the MSA, underscoring the region's strength in homeland security/defense.

Banking competition in the AA is strong with community banks, regional banks, large banks and credit unions operating in the market. FDIC data, as of June 30, 2008, shows 73 financial institutions with a total of 824 offices in the AA. These institutions hold a total of \$54 billion in deposits. The top four banks hold approximately 65% of the deposits in the AA. Fidelity Bank of Florida, N.A. is ranked 69th in market share. Leading banks in the AA are Wachovia and Bank of America with a combined market share of 39%.

Description of the Lakeland-Winter Haven Assessment Area - Metropolitan Statistical Area (MSA) 29460

Specific 2007 demographic data and economic data for the assessment area are listed below in Table 1A.

Table 1A - Demographic and Economic Characteristics of the Lakeland-Winter Haven AA (Entire Polk County)		
Population	483,924	
Number of Families	187,162	
Number of Households	132,948	
Median Family Income (MFI):	\$50,700	
*Unemployment rate	8.7%	
Number and Percent of Census Tracts in the AA:		
Low-Income Census Tracts	1	0.91%
Moderate-Income Census Tracts	28	25.45%
Middle-Income Census Tracts	63	57.27%
Upper-Income Census Tracts	18	16.36%
Total	110	100%
Number and Percent of Businesses in the AA:		
Low-Income Census Tracts	184	0.44%
Moderate-Income Census Tracts	9,114	21.92%
Middle-Income Census Tracts	23,104	55.57%
Upper-Income Census Tracts	9,172	22.06%
Total	41,574	100%

Source: 2000 Census, 2008 HUD updated income data (MFI), *US Bureau of Labor Statistics-Not Seasonally Adjusted-Dec 2008

This AA is located in the geographic center of Florida. According to Florida Enterprise, Polk County is known as “the phosphate, water skiing and citrus capital of the world.” Because of its central location, the region is also known for the presence of several large distribution facilities. For instance, UPS, Federal Express and Publix supermarkets all have extensive operations in the MSA. The region is also home to a growing variety of high tech companies in industries which range from optics/photonics and aviation/aerospace. The primary industries are trade/transportation/utilities, education/health services and professional/business. The major private

sector employers are Publix Supermarket, Wal-Mart, Lakeland Regional Medical Center and Mosaic. Of residents age 25 or older, nearly 82% had at least a high school diploma and more than 17% possessed at least a bachelor's degree. The largest providers of higher education in the MSA are Polk Community College and a branch campus of the University of South Florida.

Banking competition in the AA is strong with community banks, regional banks, large banks and credit unions operating in the market. FDIC data, as of June 30, 2008, shows 19 financial institutions with a total of 147 offices in the AA. These institutions hold a total of \$6 billion in deposits. The top five banks hold approximately 82% of the deposits in the AA; Fidelity Bank of Florida, N.A. is not listed. Leading banks in the AA are Wachovia, Colonial and SunTrust with a combined market share of 60%.

Description of the Orlando-Kissimmee Assessment Area - Metropolitan Statistical Area (MSA) 36740

Specific 2007 demographic data and economic data for the assessment area are listed below in Table 1B.

Table 1B - Demographic and Economic Characteristics of the Orlando-Kissimmee AA (Lake, Orange, Osceola and Seminole Counties)		
Population	1,644,561	
Number of Families	428,378	
Number of Households	625,346	
Median Family Income (MFI):	\$59,200	
*Unemployment rate	7.7%	
Number and Percent of Census Tracts in the AA:		
Low-Income Census Tracts	8	2.44%
Moderate-Income Census Tracts	76	23.17%
Middle-Income Census Tracts	151	46.04%
Upper-Income Census Tracts	93	28.35%
Total	328	100%
Number and Percent of Businesses in the AA:		
Low-Income Census Tracts	3,079	1.5%
Moderate-Income Census Tracts	42,747	20.79%
Middle-Income Census Tracts	97,248	47.31%
Upper-Income Census Tracts	62,492	30.40%
Total	205,566	100%

*Source: 2000 Census, 2008 HUD updated income data (MFI), *US Bureau of Labor Statistics-Not Seasonally Adjusted-Dec 2008*

According to Enterprise Florida, the AA has the fastest growing airport in the world, and the Orlando-Kissimmee MSA is primed for growth. The region's population has already exceeded 2 million. At the heart of the Florida High Tech Corridor, the MSA is also home to a \$13.4 billion technology industry that employs nearly 53,000 people. The region has fostered and supports the continual growth of several industry clusters which include life sciences, modeling, simulation & training (MS&T), photonics/optics, and digital media. The primary industries are trade/ transportation/utilities, education/health services, leisure & hospitality and professional/business. The major private sector employers are Walt Disney World, Orange County Public School, Adventist Health Systems, Universal Orlando, Orlando Regional Healthcare System and Orange County Government.

Metro Orlando possesses a large and relatively young labor force of more than one million individuals. Of the region’s total population, over 50% are between the prime working age of 18 and 54. More than 86% of residents age 25 and older possess at least a high school diploma, while over 26% have at least a bachelor’s degree. A wide variety of educational institutions are available in the region to meet its educational needs. With an enrollment of nearly 47,000 students, the University of Central Florida (UCF) in Orlando ranks as the 7th largest public university in the nation and its research facilities have been fundamental in supporting the growing technology clusters in the MSA.

Banking competition in the AA is strong with community banks, regional banks, large banks and credit unions operating in the market. FDIC data, as of June 30, 2008, shows 52 financial institutions with a total of 618 offices in the AA. These institutions hold a total of \$32 billion in deposits. The top five banks hold approximately 68% of the deposits in the AA. Fidelity Bank of Florida, N.A. is ranked 39th with a market share of 0.19%. Leading banks in the AA are Wachovia and SunTrust and Bank of America with a combined market share of 56%.

Description of the Deltona-Daytona Beach-Ormond Beach Assessment Area - Metropolitan Statistical Area (MSA) 19660

Specific 2007 demographic data and economic data for the assessment area are listed below in Table 1C.

Table 1C - Demographic and Economic Characteristics of the Deltona-Daytona Beach-Ormond Beach AA (Entire Volusia County)		
Population	443,343	
Number of Families	120,720	
Number of Households	184,721	
Median Family Income (MFI):	\$52,300	
*Unemployment rate	8.6%	
Number and Percent of Census Tracts in the AA:		
Low-Income Census Tracts	2	2.56%
Moderate-Income Census Tracts	15	19.23%
Middle-Income Census Tracts	52	66.67%
Upper-Income Census Tracts	9	11.54%
Total	78	100%
Number and Percent of Businesses in the AA:		
Low-Income Census Tracts	513	1.15%
Moderate-Income Census Tracts	8,100	18.22%
Middle-Income Census Tracts	28,990	65.21%
Upper-Income Census Tracts	6,850	15.41%
Total	44,453	100%

*Source: 2000 Census, 2008 HUD updated income data (MFI), *US Bureau of Labor Statistics-Not Seasonally Adjusted-Dec 2008*

According to Enterprise Florida, the region contains a growing medical device manufacturing and biotechnology cluster. Much of this high tech growth can be linked to the fact that the MSA forms the eastern edge of the Florida High Tech Corridor, which stretches from Daytona Beach to Tampa. This MSA contains a growing, skilled workforce. For instance, the region’s labor force has grown by 13% over the last five years. The primary industries are trade/transportation/utilities, education/health services, leisure & hospitality and professional/business. The major

private sector employers are Volusia County School Board, Halifax Staffing, Publix Supermarket and Wal-Mart.

Of those in the workforce over 25 years of age, over 86% have at least a high school degree, while more than 20% possess at least a bachelor’s degree. The MSA also continues to have a low unemployment rate. Several education options are available to meet the needs of residents such as Embry-Riddle Aeronautical University, Stetson University, Daytona Beach Community College, Bethune Cookman College, Kaiser College, the University of Central Florida, and four vocational/technical schools.

Banking competition in the AA is strong with community banks, regional banks, large banks and credit unions operating in the market. FDIC data, as of June 30, 2008, shows 28 financial institutions with a total of 165 offices in the AA. These institutions hold a total of \$8.2 billion in deposits. The top three banks hold approximately 59% of the deposits in the AA; Fidelity Bank of Florida, N.A. is not listed. Leading banks in the AA are Wachovia and SunTrust with a combined market share of 44%.

Description of the Palm Bay-Melbourne-Titusville Assessment Area - Metropolitan Statistical Area (MSA) 37340

Specific 2007 demographic data and economic data for the assessment area are listed below in Table 1D.

Table 1D - Demographic and Economic Characteristics of the Palm Bay-Melbourne-Titusville AA (Entire Brevard County)		
Population	476,230	
Number of Families	133,389	
Number of Households	198,371	
Median Family Income (MFI):	61,300	
*Unemployment rate	8.4%	
Number and Percent of Census Tracts in the AA:		
Low-Income Census Tracts	2	2.17%
Moderate-Income Census Tracts	19	20.65%
Middle-Income Census Tracts	44	47.83%
Upper-Income Census Tracts	27	29.35%
Total	92	100%
Number and Percent of Businesses in the AA:		
Low-Income Census Tracts	677	1.39%
Moderate-Income Census Tracts	12,245	25.07%
Middle-Income Census Tracts	21,621	44.26%
Upper-Income Census Tracts	14,305	29.38%
Total	48,848	100%

*Source: 2000 Census, 2008 HUD updated income data (MFI), *US Bureau of Labor Statistics-Not Seasonally Adjusted-Dec 2008*

According to Enterprise Florida, the MSA is located in east-central Florida, which is known as “Florida’s Space Coast”. The region is home to the Kennedy Space Center as well as Cape Canaveral and Patrick Air Force bases. A host of companies engaged in government contracting support the region’s thriving aviation/aerospace cluster and contribute heavily to the local economy.

The MSA has also been ranked number one in the nation by the Milken Institute for its ability to create and sustain jobs. The labor force of Palm Bay-Melbourne-Titusville has experienced strong growth over the past ten years, growing by 26.7%. The region is also well educated, evidenced by the fact that over 88% of residents 25 years of age or older possess at least a high school education and nearly 27% possess a bachelors degree or higher. Brevard Community College is one of the largest providers of higher education in the area. A large provider of private higher education is Florida Institute of Technology (FIU), located in Melbourne; the school’s curriculum is largely focused on engineering disciplines. Other educational institutions with a presence in the region include Barry University, Colombia College, Embry Riddle Aeronautical University, Florida Metropolitan University and Webster University.

As home to the Kennedy Space Center, the Spaceport Technology Center and several major government contractors, the Palm Bay-Melbourne-Titusville MSA is a beacon for aviation/aerospace related technologies and associated companies. The region’s existing firms have helped it rank 45th out of 315 metro areas for high tech capacity. The region also possesses the second highest level of patent activity in the Central Florida/Space Coast region. Major government contractors with a presence include Boeing, Northrop Grumman and Lockheed Martin. The region has demonstrated a strong commitment to growing its high tech cluster. In fact, the largest high tech company in Florida, Melbourne-based Harris Corporation, is located within the MSA. Other major private sector employers are Health First, Incorporated and United Space Alliance.

Banking competition in the AA is strong with community banks, regional banks, large banks and credit unions operating in the market. FDIC data, as of June 30, 2008, shows 19 financial institutions with a total of 145 offices in the AA. These institutions hold a total of \$7 billion in deposits. The top five banks hold approximately 72% of the deposits in the AA. Fidelity Bank of Florida, N.A. is ranked 9th with a market share of 3.27%. Leading banks in the AA are Wachovia and SunTrust with a combined market share of 57%.

COMMUNITY CONTACTS

During the evaluation period, we met with three local organizations to discuss the credit needs of the community and the responsiveness of financial institutions. The organizations are primarily involved in providing homeownership assistance to low- and moderate-income persons. Affordable housing is the main issue for low-income and moderate-income persons in the AA.

SCOPE OF THE EXAMINATION

Fidelity Bank of Florida, National Association's primary focus is business lending in the assessment area. Therefore, our conclusions were based on an analysis of a total random sample of 97 business loans originated from January 2007 to February 2009. For community development loans, investments and services, our evaluation period is from the last CRA examination of June 30, 2003 through February 27, 2009. This is the first CRA evaluation for Fidelity Bank of Florida, National Association. Under its prior structure as an FDIC chartered bank, the bank's last CRA evaluation was rated "Outstanding" at June 30, 2003.

Conclusions with Respect to Performance Tests

- **Loan-to-Deposit Ratio-Exceeds the Standard for Satisfactory Performance**

The bank's average loan-to-deposit (LTD) ratio is excellent given the bank's size, financial condition and AA credit needs. The bank's quarterly average LTD ratio was calculated from the third quarter of 2003 through the fourth quarter of 2008. The resulting average LTD ratio is 113.73%. For the same period of time, the national average LTD ratio for peer banks is 86.90%. Peer banks are those of similar asset size operating in same metropolitan statistical areas. The bank's LTD ratios ranged from 93.15% to 122.48% during the evaluation period while peer banks' LTD ratios ranged from 63.53% to 128.47% for the same time period.

Lending in Assessment Area

- **Lending in Assessment Area - Meets the Standard for Satisfactory Performance**

The bank makes a majority of its loans within the assessment area (AA). We based our conclusions on a random sample of sixty business loans that originated from January 1, 2007 to February 27, 2009. As illustrated in Table 2 below, the bank made 68.33% of the total number, and 81.23% of the total dollar amount of loans, within its AA.

Table 2 - Lending in the Combined Assessment Areas										
Type of Loan	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Business Loans	41	68.33%	19	31.67%	60	\$19,317	81.23%	\$4,465	18.77%	\$23,782

- **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes - Exceeds the Standard for Satisfactory Performance**

The bank's record of lending reflects excellent penetration among businesses of different sizes. Our analysis is based on a random sample of twenty loan originations in each metropolitan statistical area, except the Deltona-Daytona Beach-Ormond Beach MSA for which the bank made a total of sixteen loans during the evaluation period. We determined that the bank makes loans to businesses of varying sizes, but primarily to small businesses. As shown in Table 3 below, the percentage of the number of loans to small businesses (those with total revenues less than \$1 million) are well above economic data percentages of AA businesses in each MSA. Also, the percentage of bank loans by dollar amount, except for the Lakeland-Winter Haven MSA, exceeds the economic data percentage of AA businesses.

Table 3 - Distribution of Loans to Businesses in AA				
Tampa-St. Petersburg-Clearwater MSA (Hernando, Hillsborough, Pinellas and Pasco Counties)				
Business Revenues (or Sales)	<= \$1,000,000	> \$1,000,000	Unavailable	Total
% of AA Businesses	64.95%	4.26%	30.79%	100%
% of Bank Loans in AA by #	90%	10%	0%	100%
% of Bank Loans in AA by \$	88%	12%	0%	100%
Lakeland-Winter Haven MSA (Polk County)				
Business Revenues (or Sales)	<= \$1,000,000	> \$1,000,000	Unavailable	Total
% of AA Businesses	65.73%	3.85%	30.42%	100%
% of Bank Loans in AA by #	80%	5%	15%	100%
% of Bank Loans in AA by \$	55%	11%	34%	100%
Orlando-Kissimmee MSA (Osceola, Orange, Lake and Seminole Counties)				
Business Revenues (or Sales)	<= \$1,000,000	> \$1,000,000	Unavailable	Total
% of AA Businesses	65%	3.94%	31.06%	100%
% of Bank Loans in AA by #	75%	15%	10%	100%
% of Bank Loans in AA by \$	83%	7%	10%	100%
Deltona-Daytona Beach-Ormond Beach MSA (Volusia County)				
Business Revenues (or Sales)	<= \$1,000,000	> \$1,000,000	Unavailable	Total
% of AA Businesses	68.81%	3.37%	27.82%	100%
% of Bank Loans in AA by #	82%	18%	0%	100%
% of Bank Loans in AA by \$	91%	9%	0%	100%
Palm Bay-Melbourne-Titusville MSA (Brevard County)				
Business Revenues (or Sales)	<= \$1,000,000	> \$1,000,000	Unavailable	Total
% of AA Businesses	66.3%	3.54%	30.16%	100%
% of Bank Loans in AA by #	100%	0%	0%	100%
% of Bank Loans in AA by \$	100%	0%	0%	100%

Loans to Businesses - Proxy Distribution by Loan Size

FBNA also makes a large portion of business loans in smaller dollar amounts. Our sample included loans with original amounts ranging from \$12,000 to \$1,150,000; a substantial majority of the loan amounts are less than \$500,000 in all metropolitan statistical areas. These loan amounts reflect a favorable indication that FBNA makes loans that meet the needs of smaller businesses. A detailed breakdown by loan amount is presented in Table 3A below.

Table 3A - Borrower Distribution of Loans to Businesses by Loan Size in AA				
Loan Size	Number of loans	Percent of Number	Dollar Volume of Loans (000's)	% of Dollars
Tampa-St. Petersburg-Clearwater MSA (Hernando, Hillsborough, Pinellas and Pasco Counties)				
\$0-\$100,000	5	25%	\$440	7%
\$100,001-\$250,000	4	20%	\$681	10%
\$250,001-\$500,000	5	25%	\$1,779	27%
\$500,001-\$1,000,000	6	30%	\$3,715	56%
\$1,000,001-\$3,000,000	0	0%	0	0%
Total	20	100%	\$6,615	100%
Lakeland-Winter Haven MSA (Polk County)				
\$0-\$100,000	10	50%	\$619	9%
\$100,001-\$250,000	5	25%	\$1,390	20%
\$250,001-\$500,000	3	15%	\$1,920	28%
\$500,001-\$1,000,000	1	5%	\$1,100	16%
\$1,000,001-\$3,000,000	1	5%	\$1,799	27%
Total	20	100%	\$6,828	100%
Orlando-Kissimmee MSA (Osceola, Orange, Lake and Seminole Counties)				
\$0-\$100,000	5	25%	\$348	6%
\$100,001-\$250,000	6	30%	\$985	18%
\$250,001-\$500,000	6	30%	\$2,180	39%
\$500,001-\$1,000,000	3	15%	\$2,040	37%
\$1,000,001-\$3,000,000	0	0%	0	0%
Total	20	100%	\$5,553	100%
Deltona-Daytona Beach-Ormond Beach MSA (Volusia County)				
\$0-\$100,000	7	41%	\$494	15%
\$100,001-\$250,000	6	35%	\$1,045	31%
\$250,001-\$500,000	3	18%	\$1,070	32%
\$500,001-\$1,000,000	1	6%	\$740	22%
\$1,000,001-\$3,000,000	0	0%	0	0%
Total	17	100%	3,349	100%
Palm Bay-Melbourne-Titusville MSA (Brevard County)				
\$0-\$100,000	8	40%	\$359	14%
\$100,001-\$250,000	11	55%	\$1,803	72%
\$250,001-\$500,000	1	5%	\$340	14%
\$500,001-\$1,000,000	0	0%	0	0%
\$1,000,001-\$3,000,000	0	0%	0	0%
Total	20	100%	\$2,502	100%

- **Geographic Distribution of Loans - Exceeds the Standard for Satisfactory Performance**

Our analysis is based on the same random sample of business loans originated within the assessment area during the evaluation period. We noted the geographic location of the business or property purchased, depending on the nature of the loan. For comparison, we reviewed economic data that shows the geographic location of businesses in each assessment area. As illustrated in the Table 4 below, the bank has an excellent record of lending to businesses in low and moderate geographies within all of the metropolitan statistical areas. Our analysis does not identify any unexplained conspicuous gaps in lending practices for the geographies.

Table 4 - Geographic Distribution of Commercial Loans in								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Tampa-St. Petersburg-Clearwater MSA	1.66%	15%	24.82%	35%	43.11%	50%	30.41%	0%
Lakeland-Winter Haven MSA	0.44%	0%	21.92%	30%	55.57%	65%	22.06%	5%
Orlando-Kissimmee MSA	1.5%	10%	20.79%	50%	47.31%	25%	30.4%	15%
Deltona-Daytona Beach Ormond Beach MSA	1.15%	0%	18.22%	35%	65.21%	53%	15.41%	12%
Palm Bay-Melbourne-Titusville MSA	1.39%	5%	25.07%	20%	44.26%	50%	29.28%	25%

- **Responses to Complaints – Not Applicable**

We reviewed records of consumer complaints regarding FBNA made to our agency and those maintained by the bank in the public file. There were no complaints made relative to the Community Reinvestment Act during this evaluation period.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW – Not Applicable

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

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test is rated Outstanding.

In consideration of the bank's capacity and the need and availability of opportunities for community development in the bank's AA, the bank's community development performance demonstrates strong responsiveness to the needs of its AA through community development loans, qualified investments and community development services.

We reviewed information provided by FBNA for community development activities within the AA during the evaluation period. The information was reviewed to validate that the activities supported community development and were responsive to community needs.

- **Community Development Loans**

FBNA has a high level of community development loans that show responsiveness to community needs. Our interviews with local organizations indicated that affordable housing for low- and moderate-income families is the primary need in the communities, given the challenges of housing affordability in Florida's metropolitan areas. From July 2003 to February 2009, FBNA originated twenty loans totaling \$5.5 million that were for community development purposes. These loans were made to construct, refinance, purchase or renovate single family and multi-family projects for affordable housing targeted to low- and moderate-income persons in low- and moderate-income areas.

- **Community Development Investments**

FBNA has a number of qualified investments that show responsiveness to community needs. During the evaluation period, FBNA made three qualified investments totaling \$649 thousand. The largest investment is \$500 thousand in the CRA Qualified Investment Fund (CQIF). Community Capital management, the registered investment advisor to the CQIF, seeks specific investments in the bank's assessment area. The remaining \$149 thousand of investments are certificates of deposits with two minority-owned financial institutions located in low- and moderate-income census tracts.

- **Community Development Services**

The extent to which the bank provides community development services is satisfactory given its size and capacity to provide such services.

The types of services available at FBNA are satisfactory and responsive to the needs of low- and moderate-income persons in the community. The bank's branch network provides availability to low- and moderate-income persons in the community. Two of the branches are located in moderate-income geographies and one branch is located in a low-income geography. All three locations are full service branches with drive-through facilities. ATMs are not available at any locations, but the bank offers Master Card debit cards, ATM debit cards and internet banking. In 2007, the bank opened its third branch in Port Richey (Pasco County), which is located in a moderate-income census tract.

Bank personnel have engaged in community development services that are responsive to community needs. In the past year, the bank has provided many services to the community, which includes offering the FDIC Money Smart program in Brevard and Pasco Counties. This program is a series of financial education workshops that helps individuals build financial knowledge, develop financial confidence, and use banking services effectively. An employee is involved with an organization whose mission is to alleviate the problems of young persons by providing opportunities for development through education, financial counseling, social, spiritual, moral, cultural and economic growth in low- and moderate-income areas. The bank is also actively involved in fundraising events that benefit at-risk youths and their families. Branch managers are working to serve on the boards or committees of local organizations whose primary purpose is to provide affordable housing for low- and moderate-income persons.