



Comptroller of the Currency
Administrator of National Banks

LARGE BANK

Public Disclosure

August 30, 1999

Community Reinvestment Act Performance Evaluation

CNB National Bank
Charter Number: 20496

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NOTE: 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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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 **CNB National Bank (CNB)** prepared by the **Office of the Comptroller of the Currency**, the institution's supervisory agency, as of August 30, 1999. The agency evaluates performance in assessment areas, 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 CFR Part 25.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

Community Development (CD) - Affordable 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.

Full-Scope Review - Performance under the Lending, Investment and Service Tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

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 statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

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

Limited-Scope 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, branch distribution).

Low-Income - Income levels that are less than 50% of the median family income.

Median Family Income (MFI) - The median income determined by the United States 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 Statistical Area (MSA) - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80% and less than 120% of the MFI.

Moderate-Income - Income levels that are at least 50% and less than 80% of the MFI.

Small Business Loans - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Farm Loans - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

Tier 1 Capital - The total of common shareholders’ equity, perpetual preferred shareholders’ equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income - Income levels that are 120% or more of the MFI.

Overall CRA Rating

Institution’s CRA Rating: This institution is rated “**Satisfactory.**”

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

Performance Levels	CNB National Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		
Low Satisfactory		X	X
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- C good responsiveness in meeting assessment area (AA) credit needs. CNB is the largest commercial bank headquartered in its AA and has the highest deposit market share of 27%. CNB ranks number 1 in HMDA lending in its AA. The bank’s HMDA market share to low income borrowers (19%) was also higher than its overall HMDA market share (17%).
- C good distribution of HMDA loans by borrower income level.
- C adequate geographic distribution of HMDA loans throughout the AA.
- C excellent geographic distribution of small business loans throughout the AA.
- C good distribution of small business loans by borrower income level.

- C an adequate level of community development lending.
- C an adequate level of investments throughout the assessment area.
- < an adequate level of community development services provided.

Description of Institution

As of June 30, 1999, CNB National Bank (CNB), which is headquartered in Lake City, Florida, had total assets of \$312 million. Loans totaled \$216 million and deposits totaled \$269 million. The bank is 100% owned by CNB, Inc., a one bank holding company with no other subsidiaries. CNB (the bank) also has no subsidiaries or affiliated companies. At year end 1998, the bank operated out of 11 offices located in six adjacent counties: Alachua, Baker, Bradford, Columbia, Suwannee, Union. Alachua County, which contains approximately 10% of the bank's deposits, is in the Gainesville MSA. The other five counties contain 90% of CNB's deposits and are not in an MSA. During June of 1999, the bank opened a twelfth branch in Jacksonville, Florida. There were no mergers or acquisitions during the evaluation period. CNB is an intrastate bank.

Federal Deposit Insurance Corporation (FDIC) data as of June 30, 1998 disclosed that, of FDIC insured financial institutions, CNB had the following deposit market shares in the six counties in which it operated: Alachua (1%), Baker (32%), Bradford (18%), Columbia (31%), Suwannee (17%), Union (100%). For the 5-county non-MSA counties combined, CNB had a deposit market share of 27%.

CNB offers a full range of banking products and services. At June 30, 1999, the distribution of CNB's \$216 million loan portfolio was as follows: Commercial (includes commercial real estate)(50%); secured by 1-4 family residential properties (37%); consumer loans (10%); farm loans (1%); other loans (2%). As evidenced by its loan mix, CNB has, in the past, lent primarily to businesses (commercial, farm, other) versus individuals (residential, consumer). The loan-to-deposit ratio was 80%. Tier 1 capital was 11%.

There are no legal, financial, or other impediments which would hamper the bank's ability to help meet the credit needs of its community. The bank's rating at its preceding CRA examination, dated October 7, 1997 was "*Satisfactory Record of Meeting Community Credit Needs.*"

Scope of the Evaluation

Evaluation Period/Products Evaluated

This examination covers CNB's performance from January 1, 1997 to December 31, 1998. For the lending test we reviewed residential mortgage loans subject to filing under HMDA, small business loans, and small farm loans. Consumer loans were not reviewed. For the Investment Test, we reviewed investments made from January 1, 1997 to December 31, 1998. For the Service Test, we reviewed services performed from January 1, 1997 to December 31, 1998.

Data Integrity

The accuracy of 1998 data reported for HMDA, small business, and small farm loans was verified prior to the start of the August 30, 1999 data analysis phase of this CRA examination. This data integrity review took place during the week of May 17, 1999. Small business, HMDA and small farm loans were accurately reported. Information for the Investment and Service Tests was verified during the data analysis phase of this CRA exam.

Selection of Areas for Full-Scope Review

The bank has two assessment areas (AA). The first AA includes the adjacent counties of Baker, Bradford, Columbia, Suwannee, and Union. The bank obtained approximately 90% of its deposits from this AA during this evaluation period. The second AA is Alachua County, which is in the Gainesville MSA. CNB had a small presence in Alachua County where it derived approximately 10% of its deposit base. The delineation of the AAs did not reflect any illegal discrimination and did not arbitrarily exclude low or moderate income geographies.

The five adjacent, non-MSA, combined counties of Baker, Bradford, Columbia, Suwannee, and Union received a full-scope review and ratings are based on results of this analysis. A limited scope review was performed for Alachua County. Refer to the table in Appendix A for more detailed information.

Ratings

The bank's overall rating is based primarily on the area receiving the full scope review. Home mortgage and small business loans were the primary areas of focus in assessing the bank's lending performance. Small farm lending was analyzed but its impact on overall lending performance was small relative to HMDA and small business lending. See Tables 6 and 11 in Appendix C for small farm lending.

Community Contacts and Community Development Opportunities

Two community groups were contacted during this review. One group was a county government organization that administers affordable housing programs for low and moderate income people. The other group was a city government organization that oversees the affairs of the municipal affairs of the city. Both community groups identified single family housing loans for low and moderate income people as the primary credit need.

Community development opportunities in the bank's 5-county primary AA were limited. Several non-profit organizations, such as Happy House and Three Rivers Legal Service, target low and moderate income persons. For the most part, these organizations are funded by the local United Way, to which the bank contributes on an annual basis. There is one local economic council in Suwannee County that administers the SHIP program in which CNB is one of the more active lending partners. There is one CDC in Suwannee County (Suwannee Community Development Corporation) that is presently inactive. There were no affordable housing lending consortiums, tax exempt bonds for low income housing, or specialized small business investment corporations in the bank's primary AA. There were no nonprofit organizations whose primary missions are to revitalize moderate income geographies by making small business loans.

Fair Lending Review

A concurrent fair lending review did not identify any violations of the substantive provisions of antidiscrimination laws and regulations. We used a comparative file analysis for home purchase loans originated during 1998. We compared the final credit outcome for minority denied applicants to similarly qualified majority approvals. The prohibited basis was race. CNB has an effective system in place to comply with fair lending regulations.

Conclusions with respect to performance tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Based on the full scope review, the bank's performance in the 5-county AA of Baker, Bradford, Columbia, Suwannee and Union Counties is rated **High Satisfactory**. HMDA loans received greater weight than small business loans because affordable HMDA loans to low and moderate income persons were identified as the primary credit need in the AA. Therefore, the distributions by geography and borrower income levels for HMDA loans were given more weight than similar distributions of small business loans. Responsiveness to community credit needs was factored into the analysis of geographic and borrower income distribution. Community development lending and flexible lending programs existed but did not improve the bank's performance under the Lending Test.

Responsiveness to community credit needs was good. However, HMDA geographic distribution was considered adequate, offsetting to some extent the good HMDA distribution by borrower income. The distribution of small business loans by income level and by geography was excellent. CD lending was adequate and did not significantly boost performance under the lending test. CNB participated in one flexible lending program administered by a local government agency.

Lending Activity

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

Loans originated during the evaluation period reflected good responsiveness in meeting identified credit needs within the bank's assessment area (AA). CNB ranks number one among financial institutions in deposit market share in its AA. In HMDA lending, CNB ranks number two among all financial institutions in its AA and number one among commercial banks. Befitting its status as the largest commercial bank in its AA, CNB originated more HMDA loans (477 for a 17% market share) within its AA during 1997 than any other bank. This was 50% more than the 317 HMDA loans (a 14% market share) originated by the number two commercial bank. Only one of the approximately 132 financial institutions, Green Tree Financial, originated more HMDA loans (739) than CNB and had a higher market share (32%) than CNB. CNB also originated more loans to low and moderate income people than any other commercial bank in its AA. CNB originated 43 HMDA loans (a 19% market share) to low income borrowers compared to nine (a 5% market share) for the number 2 commercial bank. CNB originated 93 (a 16% market share) HMDA loans to moderate income borrowers compared to 43 (a 9% market share) for the number two commercial bank.

Distribution of Loans by Income Level of the Geography

The geographic distribution of HMDA loans was adequate. The geographic distribution of small business loans was excellent. The geographic distribution of small farm loans was adequate. There were no conspicuous gaps in the bank's lending patterns throughout its assessment area.

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations. CNB reported no multi-family HMDA loans during 1997 and 1998.

Home purchase loans were adequately distributed throughout the bank's AA. Table 2 shows that the bank's percent of home purchase loan originations in moderate income geographies was lower than the percent of owner-occupied units located in moderate income geographies. Because the bank was not

required to report this data for the five contiguous nonMSA counties, no market share information was available.

The geographic distribution of *home improvement loans* was adequate. The bank's percent of home improvement loans to borrowers residing in moderate income geographies was less than the percent of owner-occupied units situated in moderate income geographies. Market share information was not available for home improvement loans.

The geographic distribution of *refinance lending* was adequate. The bank's 5% penetration rate for refinance lending to moderate income geographies was less than the 8% of owner-occupied units situated in moderate income geographies. Market share information was not available for refinance lending.

Small Business Loans

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's small business loan originations. The focus was on penetration in moderate income geographies.

Overall, the bank's distribution of small loans to businesses originated by the bank in moderate income geographies was excellent. The bank's 9% of small business loans originated in moderate income geographies exceeded the 8% of businesses located in moderate income geographies. CNB was not required to report small business data during 1997.

Small Farm Loans

Refer to Table 6 in Appendix C for the facts and data regarding the distribution of the bank's small farm loan originations. The focus was on penetration in moderate income geographies.

Overall, the bank's distribution of small loans to farms originated by the bank in moderate income geographies was adequate. The bank's 4% of small loans to farms originated in moderate income geographies was less than the 9% of farms located in moderate income geographies. A market share analysis of the geographic distribution of small farm loans was not available. CNB was not required to report small business data during 1997.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by borrower income level was good.

The borrower income distribution of HMDA loans was good. The distribution of small loans to businesses with annual revenues of \$1 million or less and to farms with annual revenues of \$500,000 or less was excellent. The distribution of HMDA loans by borrower income received greater weight than the distribution of small business loans by borrower income.

Home Mortgage Loans

Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

The overall distribution of *home purchase loans* by borrower income level was good.

Table 7 shows that the bank's 19% percent of home purchase loan originations to moderate income borrowers exceeded the 18% of moderate income families located throughout the AA. The bank's level of home purchase lending to low income families was adequate because the bank's percent of home purchase loans to low income families was less than the percent of low income families residing throughout the bank's AA. Based on market share criteria, CNB's distribution of home purchase loans by income level for low and moderate income families was good. CNB's market share to low income borrowers matches the bank's overall market share.

The income level distribution of *home improvement loans* was good.

The bank's percent of home improvement loans to moderate income borrowers was excellent, exceeding the percent of moderate income families residing throughout the AA. The bank's percent of home improvement loans to low income borrowers was less than the percent of low income families and was considered adequate.

Based on market share criteria, CNB's distribution of home purchase loans by income level for low and moderate income families was excellent. CNB's market share to low and moderate income borrowers was 45% and 51%, respectively. These market shares exceeded CNB's 40% overall home improvement lending market share throughout its AA.

The income level distribution of *refinance lending* was good, based primarily on the strength of its market share performance.

The bank's percent of refinanced lending to moderate income borrowers was good, matching the percent of moderate income families residing throughout the AA. The bank's percent of refinanced lending to low income borrowers was less than the percent of low income families and was considered adequate. The low penetration rate to low income borrowers is considered reasonable because the percent of homeowners is low.

Based on market share criteria, CNB's distribution of refinanced loans by income level for low and moderate income families was excellent. CNB's market share to low and moderate income borrowers was 34% and 26%, respectively. These market shares exceeded CNB's 25% overall refinanced lending market share throughout its AA.

Small Business Loans

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's small business loan originations.

Overall, the bank's distribution of small business loans to businesses with annual revenues of \$1 million or less was good. Almost all (93%) of the bank's small business loans were to businesses with annual revenues of \$1 million or less. Additionally, 86% of small business loans were for amounts of \$100,000 or less. However, a majority of the businesses in the bank's AA are small businesses. Therefore, it's reasonable that a majority of the bank's small loans to businesses are to businesses with annual revenues of \$1 million or less.

Small Farm Loans

Refer to Table 11 in Appendix C for the facts and data regarding the distribution of the bank's small farm loan originations. Table 11 contains small farm loans for 1998 only.

Overall, the bank's distribution of small farm loans to farms with annual revenues of \$500,000 or less was excellent. All of the bank's small farm loans were to businesses with annual revenues of \$500,000 or less. Additionally, 90% of small farm loans were for amounts of \$100,000 or less.

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.

Given CNB's size, resources and available opportunities, the bank's level of community development lending was adequate. During this evaluation period, the bank made two community development loans totaling \$121,180. One loan was a \$110,000 mortgage loan on a building in Columbia County used as a living facility for physically and mentally challenged individuals, approximately 95% of whom are low and moderate income. This loan provides housing for low and moderate income individuals. The smaller loan for \$11,180 was to a nonprofit organization that provides community development services targeted to low and moderate income individuals.

Product Innovation and Flexibility

The bank participates in one flexible lending program which is described below. There were no innovative lending programs.

< *State Housing Initiatives Partnership Program (SHIP)* - 19 loans - \$990,000

A State of Florida program that allocates affordable housing funds to counties. SHIP funds can be utilized for a number of purposes including new construction, down payment assistance, rehabilitation, land acquisition, impact fee loans, closing cost loans, and funding for community based organizations that provide housing. Nine loans totaling \$483,000 were made during 1997. Ten loans totaling \$507,000 were made during 1998.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited scope review, the bank's performance under the Lending Test in Alachua County was weaker than the bank's overall performance under the Lending Test. However, it did not change the overall Lending Test rating. Refer to tables 1 through 11 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Investment Test is rated **Low Satisfactory**. Based on the full scope review, the bank's performance in the 5-county AA of Baker, Bradford, Columbia, Suwannee and Union Counties was adequate given available opportunities. During this two year evaluation period, CNB made \$5,244 in qualified investments. These investments consisted of contributions to five nonprofit organizations whose missions qualify as community development activities. Bank opportunities to make qualified investments were primarily limited to contributions to nonprofit organizations that met the definition of community development. Refer to page 8 for further discussion of limited CD opportunities available. Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Conclusions for Area Receiving Limited-Scope Reviews

CNB's performance under the Investment Test in Alachua County was weaker than the bank's overall Investment Test performance. However, it did not change the overall Investment Test rating. The bank made no qualified Investments in Alachua County during the evaluation period.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated **Low Satisfactory**. Based on the full scope review, the bank's performance in the 5 non-MSA county AA was adequate.

Retail Banking Services

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch and ATM delivery system.

The bank's delivery systems are accessible to different geographies and persons of different income levels within its AA. There are no low income geographies in the bank's AA. The percent of bank offices in moderate income tracts exceeded the percent of the population in moderate income geographies. The bank has 11% of its branches and ATMs in moderate income geographies compared to 7% of the population being in moderate income geographies.

The bank's record of opening and closing branches has not negatively impacted the delivery of retail services to the AA, particularly to moderate income areas. The bank did not close any offices during this evaluation period. One office opened in an upper income geography in Lake City (Columbia County), Florida during August 1997.

The bank offers a full range of services at each branch. Specific hours for each branch are tailored to the needs of the particular location. Some office lobbies are open on Saturdays until noon. All drive-in facilities, except one, are open on Saturdays. A list of hours and services is available in the public file.

Alternative delivery systems, which consist solely of ATMs, do not increase the effectiveness of delivering retail banking services to moderate income areas and to low and moderate income people.

Community Development Services

Given available opportunities, CNB has provided an adequate level of community development services. The organization to which the bank provided CD services are shown below:

Workshops for First Time Home Buyers. Under the SHIP program, prospective applicants for affordable housing must attend seminars. In conjunction with the SHIP program, loan officers of CNB conducted two seminars during this evaluation period. Each session contained about 50 participants.

Conclusions for Areas Receiving Limited Scope Reviews

CNB's performance under the Service Test in Alachua County is consistent with its overall Service Test performance.

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 nonmetropolitan areas that received comprehensive examination review (designated by the term “Full-Scope”) and those that received a less comprehensive review (designated by the term “Limited-Scope”).

Time Period Reviewed	Lending Test: (January 1 1997 to December 31, 1998) Investment Test: (January 1, 1997 to December 31, 1998) Service Test: (January 1, 1997 to December 31, 1998)	
Financial Institution		Products Reviewed
CNB National Bank Lake City, Florida		HMDA loans Small Business Loans Small Farm Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
5 counties (Baker, Bradford, Columbia, Suwannee, Union)	Full-Scope	
Alachua County	Limited Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

5 non-MSA Counties (Baker, Bradford, Columbia, Suwannee, Union) [01]

[01] 5 non-MSA Counties

Demographic Information for Full-Scope Area: 5 non-MSA Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA % of #
Geographies (Census Tracts/BNAs)	24	0	8%	83%	9%	0
Population by Geography	120,646	0	7%	85%	8%	0
Owner-Occupied Housing by Geography	31,264	0	8%	85%	7%	0
Businesses by Geography	2,688	0	8%	70%	22%	0
Farms by Geography	118	0	9%	81%	10%	0
Family Distribution by Income Level	31,293	20%	18%	22%	40%	0
Distribution of Low- and Moderate-Income Families throughout AA Geographies	31,293	0	8%	84%	8%	0
Median Family Income HUD Adjusted Median Family Income for 1998 Households Below the Poverty Level	= \$26,472 = \$33,300 = 19%	Median Housing Value Unemployment Rate:				= \$47,422 4.05%

Source: 1990 U.S. Census and 1998 HUD updated MFI.

Description of Assessment Area

The local economy is supported by agriculture, small retail business, light industry and government entities. The unemployment rate approximates that of the national unemployment rate. Major employers in Columbia County include Columbia County School System, the Veteran’s Administration Hospital and Aero Corporation. Major employers in Bradford County include the Florida State Prison System, the New River Institute and the Bradford County School Board. The major industries in Suwannee County are Gold Kist, Suwannee County School Board. Major employers in Union County include North Florida Reception Center, Union Correctional Institution, Pritchitt Trucking and Union County School Board.

Appendix C: Tables of Performance Data

Content of Standardized Tables

The tables cover the entire CRA evaluation period. 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; market rank is based on the number of loans made by the bank as compared to all other lenders in the MSA/assessment area; and market share is the number of loans originated by the bank as a percentage of the aggregate number of reportable loans originated by all lenders in the MSA/assessment area. The following is a listing and brief description of the tables included in each set:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated 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 rank and market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of HMDA Home Improvement Loan Originations** - See Table 2.
- Table 4. Geographic Distribution of HMDA Refinance Loan Originations** - See Table 2.
- Table 5. Geographic Distribution of Small Business Loan Originations** - The percentage distribution of the number of small loans (<\$1 million) to businesses originated 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 rank and market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Farm Loan Originations** - The percentage distribution of the number of small loans (<\$500,000) to farms originated 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 rank and market share information based on the most recent aggregate market data available.

- Table 7. Borrower Distribution of HMDA Home Purchase Loan Originations** - Compares the percentage distribution of the number of loans originated by the bank to low-, moderate-, middle- and upper-income borrowers to the percentage distribution of families by income level in each MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of HMDA Home Improvement Loan Originations** - See Table 7.
- Table 9. Borrower Distribution of HMDA Refinance Loan Originations** - See Table 7.
- Table 10. Borrower Distribution of Small Business Loan Originations** - Compares the percentage distribution of the number of small loans (<\$1 million) originated 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. The table also presents the percentage distribution of the number of loans originated 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 11. Borrower Distribution of Small Farm Loan Originations** - Compares the percentage distribution of the number of small loans (<\$500 thousand) originated 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. The table also presents the percentage distribution of the number of loans originated 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/assessment area.
- Table 13. Distribution of Branch and ATM Delivery System** - Compares the percentage distribution of the number of the bank's retail branches and ATMs in low-, moderate-, middle- and upper-income geographies to the percentage of the population within each geography.

Table 14. Geographic and Borrower Distribution of Consumer Loan Originations - 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 the population 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 MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME													State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998	
MSA/Assessment Area:	% of Total Bank Deposits in Rated Area	Home Mortgage		Small Business		Small Farm		Community Development		Total Reported Loans		% of Total Reported Bank Loans in Rated Area				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)					
Full-Scope:																
5 non-MSA Counties	92%	962	\$37,254	335	\$18,653	50	\$1,892	2	\$121	1,349	\$57,920	95%				
Limited-Scope:																
Alachua County	8%	39	\$2,489	30	\$3,720	4	\$37	0	\$0	73	\$6,246	5%				

Table 2. Geographic Distribution of Home Purchase Loan Originations

Geographic Distribution: HOME PURCHASE													State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans	
	% 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	#	% of Total
Full-Scope:																
5 non-MSA Counties	NA	NA	8%	3%	85%	86%	7%	11%	NA	NA	NA	NA	NA	NA	301	97%
Limited-Scope:																
Alachua County	3%	0%	22%	20%	47%	50%	28%	30%	84	< 1	0	0	< 1	0	10	3%

(*) Based on 1997 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loan Originations

Geographic Distribution: HOME IMPROVEMENT																State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998					
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans								
	% 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	#	% of Total							
Full-Scope:																							
5 non-MSA Counties	NA	NA	8%	6%	85%	92%	7%	2%	NA	NA	NA	NA	NA	NA	256	98%							
Limited-Scope:																							
Alachua County	3%	0%	22%	0%	47%	100%	28%	0%	42	< 1	0	0	< 1	0	5	2%							

(*) Based on 1997 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loan Originations

Geographic Distribution: HOME MORTGAGE REFINANCE																State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998					
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans								
	% 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	#	% of Total							
Full-Scope:																							
5 non-MSA Counties	NA	NA	8%	5%	85%	81%	7%	14%	NA	NA	NA	NA	NA	NA	405	94%							
Limited-Scope:																							
Alachua County e	3%	0%	22%	4%	47%	88%	28%	8%	30	1	0	< 1	1	0	24	6%							

(*) Based on 1997 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Business Loan Originations

Geographic Distribution: SMALL BUSINESS																	State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998				
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans								
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full-Scope:																							
5 non-MSA Counties	NA	NA	8%	9%	70%	83%	22%	8%	NA	NA	NA	NA	NA	NA	335	92%							
Limited-Scope:																							
Alachua County	7%	3%	35%	3%	35%	57%	23%	37%	NA	NA	NA	NA	NA	NA	30	8%							

(*) Based on 1997 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Farm Loan Originations

Geographic Distribution: SMALL FARM																	State: Florida		Evaluation Period: January 1, 1997 TO January 31, 1998				
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans								
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full-Scope:																							
5 non-MSA Counties	NA	NA	9%	4%	81%	96%	10%	0%	NA	NA	NA	NA	NA	NA	50	93%							
Limited-Scope:																							
Alachua County	3%	0%	18%	0%	60%	75%	19%	25%	NA	NA	NA	NA	NA	NA	4	7%							

(*) Based on 1997 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loan Originations

Borrower Distribution: HMDA HOME PURCHASE																	State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998				
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans								
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full-Scope:																							
5 non-MSA Counties	20%	7%	18%	19%	22%	25%	40%	49%	3	10	10	8	9	12	301	97%							
Limited-Scope:																							
Alachua County	23%	20%	17%	0%	19%	20%	41%	60%	84	< 1	0	0	0	< 1	10	3%							

(*) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated by CNB.

(**) Based on 1997 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loan Originations

Borrower Distribution: HOME IMPROVEMENT																	State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998				
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans								
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full-Scope:																							
5 non-MSA Counties	20%	10%	18%	24%	22%	23%	40%	43%	1	40	45	51	37	35	256	98%							
Limited-Scope:																							
Alachua County	23%	0%	17%	0%	19%	60%	41%	40%	42	< 1	0	0	0	< 1	5	2%							

(*) As a percentage of loans with borrower income information available. No information was available for 3% of loans originated by CNB.

(**) Based on 1997 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loan Originations

Borrower Distribution: HOME MORTGAGE REFINANCE																	State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998				
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans								
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total							
Full-Scope:																							
5 non-MSA Counties	20%	7%	18%	17%	22%	24%	40%	52%	1	25	34	26	22	25	405	94%							
Limited-Scope:																							
Alachua County	23%	0%	17%	25%	19%	25%	41%	50%	30	1	0	< 1	1	1	24	6%							

(*) As a percentage of loans with borrower income information available. No information was available on 1% of loans originated by CNB.

(**) Based on 1997 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Business Loan Originations

Borrower Distribution: SMALL BUSINESS										State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998		
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less			Loans by Original Amount Regardless of Business Size			Market Share****		Total Small Business Loans					
	% of Businesses*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size			
Full-Scope:														
5 non-MSA Counties	93%	93%	NA	86%	10%	4%	NA	NA	335	92%	\$58,666			
Limited-Scope:														
Alachua County	100%	100%	NA	73%	10%	17%	NA	NA	30	8%	\$124,000			

(*) As a percentage of businesses with known revenues.

(**) As a percentage of loans with revenue information available. No information was available for 0% of loans originated by CNB.

(***) The market consists of all other Small Business reporters in CNB's assessment area and is based on 1997 Aggregate Small Business Data only.

(****) Based on 1997 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Farm Loan Originations

Borrower Distribution: SMALL FARM												State: Florida			Evaluation Period: January 1, 1997 TO December 31, 1998		
MSA/Assessment Area:	Farms with Revenues of \$1 million or less			Loans by Original Amount Regardless of Farm Size			Market Share****		Total Small Farm Loans								
	% of Farms*	% BANK Loans**	% Market Loans***	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total	Avg Loan Size						
Full-Scope:																	
5 non-MSA Counties	100%	100%	NA	90%	8%	2%	NA	NA	50	93%	\$37,840						
Limited-Scope:																	
Alachua County	100%	100%	NA	100%	0%	0%	NA	NA	4	7%	\$9,250						

(*) As a percentage of farms with known revenues.

(**) As a percentage of loans with revenue information available. No information was available for 0% of loans originated by CNB.

(***) The market consists of all other Small Farm reporters in CNB's assessment area and is based on 1997 Aggregate Small Farm Data only.

(****) Based on 1997 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS										State: Florida			Evaluation Period: January 1, 1997 TO December 31 1998		
MSA/Assessment Areas:	Prior Period Investments*			Current Period Investments			Total Investments								
	#	\$ (000's)	%**	#	\$ (000's)	%**	#	\$ (000's)	% of Total \$'s						
Full-Scope:															
5 non-MSA Counties (Baker, Bradford, Columbia, Suwannee, Union)	0	0	0%	5	\$5	100%	5	\$5	100%						
Limited-Scope:															
Alachua County	0	0	\$0	0	0	\$0	0	\$0	0%						

(*) "Prior Period Investments" means investments made in a previous evaluation period that remain outstanding.

(**) Percentage of the dollars invested in that MSA/Assessment Area that are prior period investments or current period investments.

Table 13. Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																State: Florida		Evaluation Period: January 1, 1997 TO December 31, 1998			
MSA/Assessment Area:	Deposits	Branches						ATMs				Population									
	% of Total BANK Deposits	# of BANK Branches	% of Total BANK Branches	Location of Branches by Income of Geographies				# of BANK ATMs	% of Total BANK ATMs	Location of ATMs by Income of Geographies				% of the Population within Each Geography							
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp				
Full-Scope:																					
5 non-MSA Counties	92%	9	82%	0%	11%	67%	22%	9	90%	0%	11%	67%	22%	0%	7%	85%	8%				
Limited-Scope:																					
Alachua County	8%	2	18%	0%	0%	100%	0%	1	10%	0%	0%	100%	0%	11%	29%	36%	24%				

