



**COMMUNITY
REINVESTMENT ACT
(CRA)**

PUBLIC FILE



Written Comments from the Public

During calendar years 2003 through 2024, there have been no written comments received from the public that specifically relate to the Community Reinvestment Act (CRA) or to the Bank's performance in helping meet the needs of its communities.

Year-to-date 2025, there has been no written comments received from the public that specifically relate to the Community Reinvestment Act (CRA) or to the Bank's performance in helping meet the needs of its communities.



CRA Performance Evaluation

The Bank is periodically evaluated by its regulatory agency, the Federal Deposit Insurance Corporation (FDIC). Since the time the Bank opened for business on January 21, 2003, the Bank has had a CRA Performance Evaluation on the following dates:

- January 31, 2005
- January 19, 2010
- August 11, 2015
- August 20, 2018
- June 28, 2021
- June 10, 2024

See attached for the most recent report.

PUBLIC DISCLOSURE

June 10, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Sanibel Captiva Community Bank
Certificate Number: 57425

2406 Periwinkle Way
Sanibel, Florida 33957

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Atlanta Regional Office

10 10th Street NE, Suite 900
Atlanta, Georgia 30309-3849

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.

TABLE OF CONTENTS

INSTITUTION RATING	1
DESCRIPTION OF INSTITUTION	1
DESCRIPTION OF ASSESSMENT AREA	3
SCOPE OF EVALUATION	7
CONCLUSIONS ON PERFORMANCE CRITERIA.....	8
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW.....	17
APPENDICES	18
INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA.....	18
GLOSSARY	19

INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-deposit ratio is more than reasonable given the institution's size, financial condition, and assessment area's credit needs.
- The bank originated a majority of its home mortgage and small business loans within the assessment area.
- The geographic distribution of the loans reflects a reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects a poor penetration among individuals of different income levels and reasonable penetration among businesses of different sizes.
- The institution has not received any CRA-related complaints since the previous evaluation. Therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory.

- The bank's Community Development Test performance demonstrates an adequate responsiveness to the community development needs of the assessment area. The bank met these needs through community development loans, qualified investment and donations, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment area.

DESCRIPTION OF INSTITUTION

Background

Established in 2003, Sanibel Captiva Community Bank (SCCB) is a state-chartered, locally owned community bank headquartered in Sanibel, Florida. The institution does not have any subsidiaries or affiliates, and no acquisition or merger activities have occurred since the previous evaluation. SCCB received a "Satisfactory" rating at the previous FDIC Performance Evaluation, dated June 28, 2021, based on the Intermediate Small Institution Examination Procedures.

Operations

SCCB operates its main full-service office and seven full-service branch offices located throughout the southwestern portion of Florida in Lee County. The bank's main and one branch office are located in Sanibel, Florida, and six branch offices are located in Ft. Myers, Florida. Since the previous evaluation, and as a result of the damages sustained by Hurricane Ian in September 2022, SCCB temporarily closed two branches. The McGregor Branch is located in Fort Myers, Florida, and is in a middle-income census tract. This branch is currently operating in a temporary facility pending construction which is expected to be completed in the first quarter of 2025. The Periwinkle Branch is located in Sanibel, Florida, and is in an upper-income census tract. This branch has remained closed since the hurricane but is expected to reopen in the third quarter of 2024 pending construction completion. No other offices have closed or opened since the previous evaluation. The bank's offices have reasonable lobby hours from Monday through Friday. Additionally, all banking offices, except the two aforementioned branches due to damages from Hurricane Ian, operate with automated teller machines (ATMs).

The institution offers a full range of banking products and financial services to meet the needs of its community. Consumer credit products offered include residential mortgage loans, home equity loans and lines of credit, automobile loans, boat loans, personal lines of credit, credit cards, and various other personal secured and unsecured loans. In addition, SCCB uses secondary market lenders to originate long-term, fixed-rate residential mortgage loans. Since the previous evaluation, the bank sold 366 loans, totaling \$139.1 million, in the secondary market.

Business credit products offered include commercial real estate loans, construction loans, commercial term loans, business lines of credit, equipment financing, credit cards, and letters of credit. The institution also offers Small Business Administration (SBA) term loans and lines of credit, such as 7(a) and 504 small business credit programs. As a continuation since the previous evaluation, SCCB assisted the community with the SBA's 7(a) Paycheck Protection Program (PPP) in 2021 originating 332 loans totaling \$20.7 million. The SBA guaranteed these loans under the Coronavirus Aid, Relief, and Economic Security Act, also known as the CARES Act. These loans served to retain jobs that would otherwise be lost due to business closures because of the COVID-19 pandemic.

Deposit products offered include personal and business checking and savings accounts, money market accounts, certificates of deposit, and individual retirement accounts. The bank also offers cashier's checks, direct deposit, visa debit cards, night depository, safe deposit boxes, wire transfers, treasury management and merchant services. Alternative banking services include online banking (www.sancapbank.com), bill payment, mobile banking, and person-to-person payments. SCCB offers low-fee checking accounts that do not have a monthly service fee or a minimum daily balance requirement, and offers free welcome checks, online and mobile banking, bill pay, and card alert services. In addition to having ATMs at its offices, the bank is a member of the Allpoint and Presto! ATM networks that provide its customers access to fee-free ATMs.

Ability and Capacity

According to the March 31, 2024, Consolidated Reports of Condition and Income (Call Report), SCCB had total assets of \$886.7 million, total loans of \$764.2 million (or 86.2 percent of total assets), and total deposits of \$799.4 million. Since the previous evaluation, the loan portfolio composition has grown, increasing by 57.1 percent. The bank’s primary lending focus continues to be residential lending followed by commercial lending. As shown in the following table, one-to-four family residential loans comprise 53.3 percent of total loans, while commercial real estate loans (nonfarm, nonresidential properties) and commercial and industrial loans comprise 31.6 percent of total loans.

Loan Portfolio Distribution as of 3/31/2024		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	102,585	13.4
Secured by Farmland	0	0.0
Secured by 1-4 Family Residential Properties	407,635	53.3
Secured by Multifamily (5 or more) Residential Properties	3,548	0.5
Secured by Nonfarm Nonresidential Properties	183,296	24.0
Total Real Estate Loans	697,064	91.2
Commercial and Industrial Loans	58,031	7.6
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	9,554	1.3
Other Loans	0	0.0
Less: Unearned Income	444	<0.1
Total Loans	764,205	100.0
<i>Source: Call Report 3/31/2024</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank’s ability to meet the assessment area’s credit needs. However, during the evaluation period, there has been one national and one FEMA major declared disaster within the assessment area, which may have been a temporary lending impediment. The first was the nationally declared disaster of the COVID-19 Pandemic, DR-4486-FL, declared on March 25, 2020, which continued into the evaluation period. The second was DR-4673-FL, Hurricane Ian, declared on September 29, 2022.

DESCRIPTION OF ASSESSMENT AREA

SCCB continues to maintain one assessment area, which includes all census tracts of Lee County, Florida. Lee County, Florida comprises the entire Cape Coral-Fort Myers, Florida Metropolitan Statistical Area (Ft. Myers MSA AA). The Ft. Myers MSA AA is delineated in accordance with the technical requirements of the CRA regulation. While the bank’s assessment area has not changed since the previous evaluation, the U.S. Census Bureau data was updated from 2010 to 2020 census information. The 2020 update in census information covers lending analyzed for 2022 and 2023; whereas the 2010 census information, with the 2015 American Community Survey (ACS) update, covers lending analyzed for 2021. Demographic information, including population and housing

characteristics, were also updated. When compared to the previous evaluation, the 2020 census update resulted in a change of census tract designations in the bank's assessment area. Specifically, the number of census tracts increased from 167 to 223. Additionally, the number of low-income census tracts decreased from 7 to 5; moderate-income census tracts increased from 42 to 48; middle-income census tracts increased from 60 to 99; upper-income census tracts increased from 56 to 66; and census tracts without an income designation increased from 2 to 5.

Economic and Demographic Data

Based on 2020 U.S. Census data and 2023 Dun and Bradstreet (D&B) data, the following table illustrates select demographic characteristics of the Ft. Myers MSA AA.

Demographic Information of the Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	223	2.2	21.5	44.4	29.6	2.2
Population by Geography	760,822	2.3	23.7	46.7	26.4	0.8
Housing Units by Geography	401,252	1.7	20.3	44.9	32.2	0.9
Owner-Occupied Units by Geography	209,905	1.0	17.1	49.6	32.1	0.2
Occupied Rental Units by Geography	79,011	4.7	36.5	40.3	18.1	0.4
Vacant Units by Geography	112,336	1.1	14.9	39.4	42.3	2.4
Businesses by Geography	177,348	2.2	22.4	46.2	28.6	0.7
Farms by Geography	4,911	2.1	22.5	48.7	26.5	0.2
Family Distribution by Income Level	187,877	19.3	19.0	20.8	40.9	0.0
Household Distribution by Income	288,916	22.3	17.0	19.2	41.4	0.0
Median Family Income MSA - 15980 Cape Coral-Fort Myers, FL MSA	\$71,043	Median Housing Value				\$264,556
		Median Gross Rent				\$1,253
		Families Below Poverty Level				7.9%

*Source: 2020 U.S. Census Data and 2023 D&B Data. Due to rounding, totals may not equal 100.0 percent.
The NA category consists of geographies (census tracts) that have not been assigned an income classification.

Examiners used the Federal Financial Institutions Examination Council (FFIEC) updated median family income (MFI) for the Ft. Myers MSA AA to analyze the bank’s home mortgage lending under the *Borrower Profile* criterion. The following table reflects the low-, moderate-, middle-, and upper-income MFI categories in the assessment area. During the evaluation timeframe, the maximum MFIs for low- and moderate-income families was low considering the median housing value of \$264,556. Also, during the evaluation timeframe, 7.9 percent of families had incomes below the federal poverty level. These families will likely face difficulty in qualifying for home mortgage loans.

Cape Coral-Fort Myers, FL MSA Median Family Income (15980)				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2021 (\$71,900)	<\$35,950	\$35,950 to <\$57,520	\$57,520 to <\$86,280	≥\$86,280
2022 (\$83,200)	<\$41,600	\$41,600 to <\$66,560	\$66,560 to <\$99,840	≥\$99,840
2023 (\$85,900)	<\$42,950	\$42,950 to <\$68,720	\$68,720 to <\$103,080	≥\$103,080

Source: FFIEC

As shown in the following table, the annual unemployment rates for Lee County declined from 2021 to 2023. Lee County’s unemployment rate was slightly below the state’s unemployment rate in 2021 but slightly above the state’s unemployment rates in 2022 and 2023. Lee County’s unemployment rates were below the national averages for all three years.

Unemployment Rates			
Area	2021	2022	2023
	%	%	%
Lee County	4.3	3.3	3.2
State of Florida	4.7	3.0	2.9
Nation	5.3	3.6	3.6

Source: Bureau of Labor Statistics

In terms of businesses and the economy, the *Florida Department of Economic Opportunity* reflects the top three industries in the Ft. Myers MSA AA are retail trade; health care and social assistance; and accommodation and food services. According to *Moody’s Analytics, Inc.*, the largest employers in the Ft. Myers MSA AA are Chico’s FAS, Inc.; Florida Gulf Coast University; Garnter; Hertz Rentals; Hope Hospice; Lee County Local Government; Lee County Public Schools; Lee Memorial Health System; McDonald’s; Publix Super Markets, Inc.; and Walmart, Inc.

According to *Moody’s Analytics, Inc.*, dated April 2024, the Ft. Myers MSA AA’s economy is struggling to move forward as the labor market has lost momentum coming into 2024, with jobs in most industries sliding backwards or idling in the first three months of the year. Frequent extreme weather and an expensive stock of housing, inclusive of a swift rise in house prices over the past three years, has resulted in the area’s homeowners facing some of the highest premiums in the nation. Skyrocketing insurance costs in the wake of Hurricane Ian has threatened the area’s housing market. The leisure and hospitality sector remains a cornerstone of the economy as the area is a tourism hub and consumer industries’ share of employment ranks in the top five among the nation’s 100 largest metropolitan areas. Leisure and hospitality suffered a significant hit in the aftermath of Hurricane Ian and the industry’s recovery has stalled for the past year. Yet, continued recovery from Hurricane Ian will keep growth above the state pace. An older-than-average population strengthens the healthcare industry in the area as the net migration of middle-aged and older workers to the area has supported medical services spending.

Competition

There is a moderate level of competition for deposits in the Ft. Myers MSA AA. In addition to competing with large national and regional banks, the bank competes with local banks, credit unions, and finance companies. As of June 30, 2023, 34 FDIC insured institutions operated 164 offices within the Ft. Myers MSA AA. The top institutions by deposit market share were Wells Fargo Bank, N.A. (15.3 percent); Bank of America, N.A. (14.7 percent); and Truist Bank (13.8 percent). SCCB ranked eighth in deposit market share with 3.4 percent.

The bank is required to collect and report its Home Mortgage Disclosure Act (HMDA) data. Therefore, the analysis of home mortgage loans under the Lending Test includes a comparison against aggregate data. There is a high level of competition for home mortgage loans.

In 2022, the most recent year for which aggregate data is available, 1,010 lenders reported the origination and purchase of 34,940 home mortgage loans. The top five institutions (by number of loans) were Rocket Mortgage (6.0 percent); Suncoast Credit Union (5.7 percent); United Wholesale Mortgage (5.6 percent); Wells Fargo Bank N.A. (3.3 percent); and Pennymac Loan Services, LLC (2.9 percent). Collectively, these leading institutions accounted for 23.5 percent of the total market share. SCCB ranked 37th in home mortgage originations with a market share of 0.6 percent.

The bank is not required to collect or report its small business loan data, and it has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. The aggregate data for small business lending, however, reflects the level of demand and competition for small business loans. There is a moderate level of competition for small business loans in the assessment area. In 2022, the most recent year for which aggregate data is available, 159 lenders reported 28,866 small business loans. The top five institutions (by number of loans) were American Express National Bank (6.3 percent); JPMorgan Chase Bank, N.A. (14.3 percent); Bank of America, N.A. (11.0 percent); Capital One, N.A. (7.3 percent); and Citibank, N.A. (5.7 percent). Collectively, these leading institutions accounted for 44.6 percent of the total market share.

Community Contact

Examiners rely on contacts with community organizations to gain insight regarding the credit and community development needs and economic conditions of a bank's assessment area. This information helps determine whether local financial institutions are responsive to these needs. It also reflects what credit and community development opportunities are available. During this evaluation, examiners conducted a new community contact with a housing organization that serves the Ft. Myers MSA AA.

The community contact stated affordable housing is a significant need in the area and added that the top three housing issues in the area include: rent increases, homelessness, and housing quality. The contact noted that housing costs have risen, making it difficult for low- and moderate-income families to afford rent. The contact said this is especially problematic in areas hit by natural disasters, such as Hurricane Ian, where housing stock may be reduced. The contact added that the risk of homelessness has increased due to job losses and insufficient affordable housing options. Post-Hurricane Ian, the contact noted that many low- and moderate-income families may live in damaged homes or substandard housing due to inability to afford repairs. There are many areas of Southwest Florida where affordable housing is in need. Those areas include Cape Coral, Fort Myers, Dunbar, Fort Myers Beach, Lehigh Acres, and San Carlos Park.

The contact noted affordable housing for both rental and for sale remains the number one issue in the area. The contact said that there is high demand for affordable housing, leading to waiting lists for the few affordable housing developments that are being built. Finally, the contact noted that there are positive strides being made by financial institutions to support the housing credit needs of low- and moderate-income communities. Yet, the contact stated significant challenges and opportunities remain and that continued efforts to improve access, enhance transparency and build trust within the community are crucial for better meeting the community's housing needs.

Credit and Community Development Needs and Opportunities

Examiners reviewed demographic data, economic data and information obtained from a recent community contact to identify the credit and community development needs of the Ft. Myers MSA AA. First, based on information from a recent community contact and demographic data, affordable housing loans are needed in the community. Data reflects a relatively high percentage of low- and moderate-income families, at 38.3 percent, and a poverty rate at 7.9 percent. Many of these families would find it difficult to qualify for conventional home mortgage loans. Thus, government-guaranteed home loan programs, with more flexible underwriting criteria, are also needed. Second, home repair and home improvement loans are needed. This need is supported by information from a community contact and demographic data that reflects the average median age of housing stock is 52 years for low-income areas and 35 years for moderate-income areas. Third, based on D&B data, 93.6 percent of businesses have gross annual revenues of \$1.0 million or less, indicating a need for small business loans or lines of credit.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated June 28, 2021, to the current evaluation dated June 10, 2024. Examiners used the Interagency Intermediate Small Institution CRA Examination Procedures to evaluate SCCB's CRA performance. As described in the Appendices, these procedures include two tests: the Lending Test and the Community Development Test. A bank must achieve at least a satisfactory rating for each test to obtain an overall satisfactory rating. The Ft. Myers MSA AA, the sole assessment area, received a full-scope review.

Activities Reviewed

For the Lending Test, the CRA regulation requires a review of the lending performance of a bank in its defined assessment area(s) with respect to home mortgage, small business, and small farm loans, if significant. SCCB's major product line is home mortgage loans followed by small business loans. This conclusion considered the bank's business strategy, as well as the number and dollar volume of loans originated or purchased during the evaluation period. Consequently, for this evaluation, home mortgage loans received more weight than small business loans. Small farm loans were not evaluated because this is not a significant loan product for the institution and there are no farm loans in the bank's loan portfolio.

For the Lending Test, examiners reviewed all loans reported pursuant to the HMDA from 2021 through 2023. In total, the bank originated 765 home mortgage loans totaling \$484.6 million. Examiners compared the bank's performance to the respective HMDA aggregate data for 2021 and 2022. Aggregate data for 2023 was not available at the time of the evaluation. Examiners also compared the bank's 2021 home mortgage lending performance to applicable demographic data based on the 2015 ACS data. For 2022 and 2023 home mortgage lending performance, 2020

Census data was used for comparison purposes. All three years were analyzed and presented given lending deviation from year to year. Based on the bank’s residential lending focus and the number of loans in the universe for each loan product reviewed, home mortgage loans received the most weight in the Lending Test conclusions.

In addition, examiners reviewed all 200 small business loans from 2021 through 2023 to draw conclusions about the bank’s performance. Examiners compared small business lending performance to applicable 2021, 2022, and 2023 Dun & Bradstreet (D&B) business demographic data. All three years were analyzed and presented given lending deviation from year to year. Based on the bank’s business lending focus and the number of loans in the universe for each loan product reviewed, small business loans received less weight in the Lending Test conclusions.

For the Community Development Test, examiners reviewed the bank’s qualified community development loans, investments, and services since the prior evaluation to the current evaluation.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

SCCB demonstrated overall satisfactory performance under the Lending Test. This rating is primarily supported by a reasonable loan-to-deposit ratio; a majority of the loans originated within the assessment area; and a reasonable geographic distribution of loans.

Loan-to-Deposit Ratio

The bank’s average loan-to-deposit (LTD) ratio is reasonable given the institution’s size, financial condition, and assessment areas’ credit needs. The LTD ratio for the previous 12 quarters averaged 79.7 percent. Since the previous evaluation, the bank’s LTD ratio ranged from a high of 94.6 percent on March 31, 2024, to a low of 60.3 percent on March 31, 2022. The LTD ratio has fluctuated quarter-to-quarter, with no distinctive trend.

The following table presents the average LTD ratio for SCCB as well as for three similarly situated institutions based on asset size, lending focus, and geographic location. As shown below, SCCB maintained an average LTD ratio that exceeded the comparable banks.

Average Net LTD Ratio Comparison		
Bank Name and Location	Total Assets as of March 31, 2024 (\$000s)	Average Net LTD Ratio (%)
Sanibel Captive Community Bank, Sanibel, FL	886,730	79.7
First Bank, Clewiston, FL	721,527	61.5
Brannen Bank, Inverness, FL	901,847	41.2
Bank of Central Florida Bank, Lakeland, FL	1,087,312	60.6
<i>Source: Call Report 6/30/2021 to 3/31/2024</i>		

Assessment Area Concentration

Overall, the bank originated a majority of loans in the assessment area. SCCB originated a majority of the home mortgage and small business loans, by both number and dollar volume, within the bank’s assessment area. Refer to the following table for details.

Lending Inside and Outside of the Assessment Areas										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business										
2021	198	87.2	29	12.8	227	105,283	78.9	28,132	21.1	133,415
2022	225	79.8	57	20.2	282	133,005	70.0	56,889	30.0	189,894
2023	217	84.8	39	15.2	256	124,465	77.2	36,776	22.8	161,241
Subtotal	640	83.7	125	16.3	765	362,753	74.9	121,797	25.1	484,550
Home Mortgage										
2021	58	87.9	8	12.1	66	14,673	89.8	1,659	10.2	16,332
2022	65	89.0	8	11.0	73	19,763	88.7	2,529	11.3	22,292
2023	55	90.2	6	9.8	61	17,014	88.9	2,128	11.1	19,142
Subtotal	178	89.0	22	11.0	200	51,450	89.1	6,316	10.9	57,766
Total	818	84.8	147	15.2	965	414,203	76.4	128,113	23.6	542,316
<i>Source: 2021, 2022, and 2023 HMDA LARs and Bank Records. Due to rounding, totals may not equal 100.0%</i>										

Geographic Distribution

The geographic distribution of home mortgage and small business loans reflect reasonable dispersion throughout the assessment area. The bank’s reasonable performance in home mortgage and small business lending support this conclusion.

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. The following table shows that the bank did not make any home mortgage loans in low-income census tracts in 2022 and 2023 and only 0.5 percent in 2021. There is limited opportunity to make home mortgage loans in low-income geographies, with owner-occupied housing units comprising only 2.1 percent in 2021, and 1.0 percent in 2022 and 2023.

The bank’s lending performance of home mortgage loans in moderate-income census tracts is below demographic data and aggregate lending data. Yet, the bank’s performance improved from year to year and is considered reasonable given the high level of competition for home mortgage loans within the assessment area and the impact of natural disasters that occurred during the evaluation period.

Geographic Distribution of Home Mortgage Loans in the Ft. Myers MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	2.1	1.4	1	0.5	273	0.3
2022	1.0	0.9	0	0.0	0	0.0
2023	1.0	--	0	0.0	0	0.0
Moderate						
2021	18.6	19.6	11	5.6	2,190	2.1
2022	17.1	18.2	22	9.8	6,500	4.9
2023	17.1	--	22	10.1	7,590	6.1
Middle						
2021	44.2	44.7	76	38.4	30,922	29.3
2022	49.6	50.1	81	36.0	36,544	27.5
2023	49.6	--	67	30.9	30,627	24.6
Upper						
2021	35.1	34.3	110	55.5	71,898	68.3
2022	32.1	30.2	119	52.9	85,415	64.2
2023	32.1	--	126	58.1	77,248	62.1
Not Available						
2021	0.0	0.0	0	0.0	0	0.0
2022	0.2	0.6	3	1.3	4,546	3.4
2023	0.2	--	2	0.9	9,000	7.2
Totals						
2021	100.0	100.0	198	100.0	105,283	100.0
2022	100.0	100.0	225	100.0	133,005	100.0
2023	100.0	--	217	100.0	124,465	100.0

Source: 2015 ACS for 2021; 2020 U.S. Census for 2022 & 2023; 2021 & 2022 Aggregate HMDA Data; 2021, 2022 & 2023 HMDA LARs; "--" data not available. Due to rounding, totals may not equal 100.0%

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. The bank's small business lending performance in low-income tracts exceeded demographics for two of the three years. The bank's performance in moderate-income census tracts was comparable to demographic data for all three years.

Geographic Distribution of Small Business Loans in the Ft. Myers MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low					
2021	2.9	3	5.2	1,148	7.8
2022	2.1	2	3.1	113	0.6
2023	2.2	--	--	--	--
Moderate					
2021	22.8	12	20.7	2,897	19.7
2022	21.9	12	18.5	3,907	19.8
2023	22.3	8	14.6	2,493	14.7
Middle					
2021	41.0	18	31.0	4,003	27.3
2022	46.1	29	44.6	10,097	51.1
2023	46.2	21	38.2	7,134	41.9
Upper					
2021	33.0	25	43.1	6,625	45.2
2022	29.2	22	33.8	5,646	28.5
2023	28.6	24	43.6	6,567	38.6
Not Available					
2021	0.1	--	--	--	--
2022	0.7	--	--	--	--
2023	0.7	2	3.6	820	4.8
Totals					
2021	100.0	58	100.0	14,673	100.0
2022	100.0	65	100.0	19,763	100.0
2023	100.0	55	100.0	17,014	100.0
<i>Source: 2021, 2022 & 2023 D&B Data; Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>					

Borrower Profile

The distribution of loans reflects, given the demographics of the assessment area, poor penetration among borrowers of different income levels and businesses of different sizes. The bank's poor performance in home mortgage and small business lending support this conclusion.

Home Mortgage Loans

The distribution of home mortgage loans to individuals reflects poor penetration among borrowers of different income levels.

As shown in the following table, the bank’s origination of home mortgage loans to low-income borrowers is reasonable. While the performance was below demographic data for the three years, the level of lending exceeded aggregate performance in 2021 and is comparable for 2022. However, the bank’s home mortgage lending to moderate-income borrowers was poor because it was below the percentage of moderate-income families for all three years and below the level of aggregate lending in both years for which it was available.

Distribution of Home Mortgage Loans by Borrower Income Level in the Ft. Myers MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low						
2021	20.7	3.8	11	5.6	2,219	2.1
2022	19.3	4.6	5	2.2	1,637	1.2
2023	19.3	--	7	3.2	1,699	1.4
Moderate						
2021	18.5	15.4	12	6.1	2,871	2.7
2022	19.0	16.1	17	7.6	6,108	4.6
2023	19.0	--	11	5.1	3,989	3.2
Middle						
2021	19.7	19.9	17	8.6	4,888	4.7
2022	20.8	21.7	23	10.2	6,409	4.8
2023	20.8	--	21	9.7	6,204	5.0
Upper						
2021	41.1	44.3	124	62.6	69,616	66.1
2022	40.9	42.7	125	55.6	80,495	60.5
2023	40.9	--	119	54.8	72,809	58.5
Not Available						
2021	0.0	16.6	34	17.1	25,689	24.4
2022	0.0	14.9	55	24.4	38,356	28.9
2023	0.0	--	59	27.2	39,764	31.9
Totals						
2021	100.0	100.0	198	100.0	105,283	100.0
2022	100.0	100.0	225	100.0	133,005	100.0
2023	100.0	--	217	100.0	124,465	100.0

Source: 2015 ACS for 2021; 2020 U.S. Census for 2022 & 2023; 2021 & 2022 Aggregate HMDA Data; 2021, 2022 & 2023 HMDA LARs; "--" data not available. Due to rounding, totals may not equal 100.0%

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes.

As illustrated in the following table, the bank’s small business lending performance to businesses with gross annual revenues of \$1 million or less was below demographic data for all three years; however, has improved over the evaluation period. This performance is considered reasonable, when considering the level of competition in the assessment area.

Distribution of Small Business Loans by Gross Annual Revenue Category in the Ft. Myers MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<=\$1,000,000					
2021	93.2	28	48.3	6,071	41.4
2022	93.9	41	63.1	14,929	75.5
2023	93.6	46	83.6	13,927	81.9
>\$1,000,000					
2021	2.0	14	24.1	2,917	19.9
2022	1.7	19	29.2	4,310	21.8
2023	1.5	9	16.4	3,087	18.1
Revenue Not Available					
2021	4.8	16	27.6	5,685	38.7
2022	4.4	5	7.7	524	2.7
2023	4.9	--	--	--	--
Totals					
2021	100.0	58	100.0	14,673	100.0
2022	100.0	65	100.0	19,763	100.0
2023	100.0	55	100.0	17,014	100.0
<i>Source: 2021, 2022 & 2023 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%</i>					

Response to Complaints

The bank has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

The bank’s community development performance demonstrates adequate responsiveness to the community development needs of the assessment area. The bank met these needs through community development loans, qualified investments, and community development services. When evaluating this test, examiners consider the bank’s capacity and the need and availability of such opportunities for community development in the bank’s assessment area.

Community Development Loans

SCCB originated 43 community development loans totaling approximately \$60.1 million during the evaluation period. This dollar volume of activity represents 7.6 percent of the average of total assets and 10.1 percent of the average of total loans during the evaluation timeframe, which exceeds performance at the last evaluation. The level of the bank’s community development loans was comparable to two, and exceeded one, of the three similarly situated institutions.

The bank’s community development loans, by number and dollar volume, primarily supported revitalization or stabilization efforts in the assessment area and demonstrates adequate responsiveness to the opportunities for community development lending during the evaluation timeframe. The following table details the bank’s community development lending by activity year and purpose.

Community Development Lending by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2021 (Partial)	-	--	-	--	-	--	-	--	-	--
2022	1	231	-	--	1	1,405	8	8,605	10	10,241
2023	-	--	-	--	-	--	26	45,499	26	45,499
2024 (YTD)	-	--	-	--	1	147	6	4,240	7	4,387
Total	1	231	-	--	2	1,552	40	58,344	43	60,127
<i>Source: Bank Records</i>										

The following are notable examples of the bank’s community development lending:

- In 2023, SCCB was responsive to community needs and financed a \$5.5 million dollar revitalization/stabilization loan post-Hurricane Ian. The loan helped a hotel and restaurant on Ft. Myers Beach, a designated disaster area, which supported the retention of businesses and residents by restoring business operations.
- In 2022, the institution refinanced a \$231.0 thousand loan for an 11 unit-multifamily housing building. The loan provides low-income individuals with affordable housing and the property is located in downtown Ft. Myers in a low-income census tract.
- In 2024, the bank financed a \$146.8 thousand economic development loan which refinanced a line of credit to a local chamber of commerce in the assessment area. The organization was adversely impacted by Hurricane Ian and the line of credit helped with normal business support for small businesses and some repairs needed. The loan was not counted in the Lending Test and was responsive to the needs of the community.
- In 2022, the bank financed a \$1.5 million dollar revitalization/stabilization loan to a roofing business to aid in the repair of roofs in a declared disaster area in Ft. Myers MSA AA from damage done by Hurricane Ian. The loan supports jobs of moderate-income employees in the assessment area.

Qualified Investments

SCCB made 68 qualified investments and donations totaling \$1.3 million during the evaluation period. This total includes one qualified equity investment of \$1.0 million and 67 donations totaling \$261.0 thousand. The dollar volume of the equity investments and donations equates to 0.2 percent of the average of total assets and 3.3 percent of the average of total securities during the evaluation timeframe, which exceeded the bank’s level of investments at the last evaluation. The level of the bank’s qualified investments and donations was comparable to two, and exceeded one, of the three similarly situated institutions. The bank demonstrated adequate responsiveness to the opportunities for qualified investments during the evaluation period.

The bank’s qualified investments and donations primarily supported community services by number and affordable housing by dollar volume. The following table shows the bank’s qualified investments by year and purpose.

Qualified Investments and Donations by Year										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	-	--	-	--	-	--	-	--	-	--
2021 (Partial)	-	--	17	44	-	--	-	--	17	44
2022	3	1,048	24	40	-	--	-	--	27	1,088
2023	1	20	14	29	2	100	-	--	17	149
2024 (YTD)	-	--	7	32	-	--	-	--	7	32
Total	4	1,068	62	145	2	100	-	--	68	1,313

Source: Bank Records

The following are notable examples of qualified investments and donations:

- In 2022, the bank invested approximately \$1.0 million in an affordable housing bond which is a need in the assessment area. The bond helped finance low-interest mortgages for low- and moderate-income individuals and families within the Ft. Myers MSA AA.
- In 2023, SCCB was responsive to the needs of the community and donated \$50,000 each to two different local chamber of commerce organizations that were adversely impacted by Hurricane Ian. The funds allowed the organizations to support its ongoing work assisting small businesses in the assessment area recover and rebuild in the aftermath of the hurricane.
- In 2021, the institution donated \$25,000 to a community service organization in the Ft. Myers MSA AA. The organization helps children and families work through the loss of a loved one. Over 60 percent of the children and families served by this organization are considered low- to moderate-income households.
- In 2022 and 2023, SCCB was responsive to the needs of the community and provided \$20,000 each year to a housing organization in the assessment area. The organization provides homes for low- and moderate-income individuals and families who may not otherwise be able to find affordable housing. The organization is located in a moderate-

income census tract in the Ft. Myers MSA AA.

Community Development Services

During the evaluation period, bank employees participated in 21 community development services by providing financial expertise or technical assistance to a variety of organizations in the assessment area. The number of services provided by the bank was below those provided at the previous evaluation. The bank’s performance is consistent with one, and below two, of the similarly situated institutions. The bank demonstrated adequate responsiveness to the opportunities for community development services during the evaluation period.

The bank’s community development services supported community services and economic development. The following table shows the bank’s community development services by year and purpose.

Community Development Services by Year					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Total
	#	#	#	#	#
2021 (Partial)	-	3	2	-	5
2022	-	3	3	-	6
2023	-	3	2	-	5
2024 (YTD)	-	3	2	-	5
Total	-	12	9	-	21

Source: Bank Records

Below are notable examples of the bank’s community development services:

- Since 2021, an executive officer of the bank served on the Board of a non-profit, educational foundation of a college in the Ft. Myers MSA AA. The organization provides educational support for underprivileged students. The executive officer is currently the Chairman of the Board, and has previously served on the Finance Committee, for the organization.
- Since 2021, two bank employees have served on various committees of a local chamber of commerce using their financial expertise to provide technical assistance. The chamber is located in the assessment area and activities support economic development in the community.
- Since 2021, a bank officer serves on the Executive Committee as a Resource Development Chair. The officer uses her financial expertise in marketing and planning to assist a non-profit organization with fundraising activities. The organization helps low- and moderate-income, at-risk girls through education, counseling, training, and advocacy and is located within the Ft. Myers MSA AA in a low-income census tract.

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

GLOSSARY

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

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose institution:
 - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the institution's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the institution's retail banking services under § 345.24(d).

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

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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

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

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

Small Business Loan: A loan included in "loans to small businesses" as defined in the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$1 million or less and are either secured by nonfarm nonresidential properties or are classified as commercial and industrial loans.

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

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.



List of Branches

Location:	Office:	Geography: (Census Tract)
2406 Periwinkle Way Sanibel, Florida 33957 Tel: (239) 472-6100 Fax: (239) 472-5678	Main Office	802.04
1019 Periwinkle Way Sanibel, Florida 33957 Tel: (239) 472-6150 Fax: (239) 472-1324	Branch	802.02
15975 McGregor Blvd. Fort Myers, Florida 33908 Tel: (239) 210-7100 Fax: (239) 415-3386	Branch	19.13
7040 Winkler Road Fort Myers, Florida 33919 Tel: (239) 274-7400 Fax: (239) 437-5824	Branch	17.11
7500 College Parkway Fort Myers, Florida 33907 Tel: (239) 274-6200 Fax: (239) 274-6201	Branch	17.08
1533 Hendry Street Suite 101 Fort Myers, FL 33901 Tel: (239) 274-6205 Fax: N/A	Branch	803.00



List of Branches (continued)

Location:	Office:	Geography: (Census Tract)
11691 Gateway Boulevard Suite 101 Fort Myers, Florida 33913 Tel: (239) 274-6210 Fax: (239) 336-5454	Branch	401.36
9311 College Parkway Fort Myers, Florida 33919 Tel: (239) 274-6250 Fax: (239) 336-5484	Branch	17.01



Opened Branches

Location:	Office:	Geography: (Census Tract)	Date Opened:
2406 Periwinkle Way Sanibel, Florida 33957 Tel: (239) 472-6100 Fax: (239) 472-5678	Main Office	802.04	01/21/03 06/02/03 (relocation to new site) 02/01/21 (relocation to new site)
1019 Periwinkle Way Sanibel, Florida 33957 Tel: (239) 472-6150 Fax: (239) 472-1324	Branch	802.02	11/08/04 09/17/24 (relocation to new site)
15975 McGregor Blvd. Fort Myers, Florida 33908 Tel: (239) 210-7100 Fax: (239) 415-3386	Branch	19.13	10/20/06 07/23/07 (relocation to new site)
7040 Winkler Road Fort Myers, Florida 33919 Tel: (239) 274-7400 Fax: (239) 437-5824	Branch	17.11	01/06/15
7500 College Parkway Fort Myers, Florida 33907 Tel: (239) 274-6200 Fax: (239) 274-6201	Branch	17.08	02/17/16
1533 Hendry Street Suite 101 Fort Myers, Florida 33901 Tel: (239) 274-6205 Fax: (239) NA	Branch	803.00	01/05/17



Opened Branches (continued)

Location:	Office:	Geography: (Census Tract)	Date Opened:
11691 Gateway Boulevard Suite 101 Fort Myers, Florida 33913 Tel: (239) 274-6210 Fax: (239) 336-5454	Branch	401.36	02/21/17
9311 College Parkway Fort Myers, Florida 33919 Tel: (239) 274-6250 Fax: (239) 336-5484	Branch	17.01	07/01/20



Closed Branches

LOCATION:	OFFICE:	GEOGRAPHY: (CENSUS TRACT)	DATE CLOSED:
2495 Palm Ridge Road Sanibel, Florida 33957 Tel: (239) 472-6100 Fax: (239) 472-5678	Main Office	802.01	05/30/03 Note: This office was not officially closed, but a temporary location until the permanent building site was completed.
16681 McGregor Blvd., #305 Fort Myers, Florida 33908 Tel: (239) 210-7100 Fax: (239) 415-3386	Branch Office	19.05	07/20/07 Note: This office was not officially closed, but a temporary location until the permanent building site was completed.
2475 Library Way Sanibel, Florida 33957 Tel: (239) 472-6100 Fax: (239) 472-5678	Main Office	802.01	01/29/21 Note: Main office relocated to 2406 Periwinkle Way



Closed Branches (continued)

LOCATION:	OFFICE:	GEOGRAPHY: <small>(CENSUS TRACT)</small>	DATE CLOSED:
1037 Periwinkle Way Sanibel, Florida 3357 Tel: (239) 472-6150 Fax: (239) 472-1324	Branch Office	802.02	09/30/22 Note: This office was closed due to damages sustained from Hurricane Ian. Branch was relocated in Sept 2024.



Services Provided (Deposits & Loans)

Personal:

Free Personal Checking

A non-interest earning basic checking account.

- ▶ No monthly service charge
- ▶ No required daily balance
- ▶ Free pack of Welcome Checks
- ▶ Free online and mobile banking
- ▶ Free Bill Pay
- ▶ Free CardValet
- ▶ Minimum Opening Deposit: \$50

Hometown Checking

An interest-bearing account.

- ▶ No monthly service charge with average daily balance of \$1,500
- ▶ Interest paid on all collected balances (rates will vary)
- ▶ 50% discount on safe deposit boxes
- ▶ Free pack of Welcome Checks
- ▶ Free online and mobile banking
- ▶ Free Bill Pay
- ▶ Free CardValet
- ▶ Minimum opening deposit: \$100

Platinum Checking – Senior Account

A checking account for customers ages 50+.

- ▶ No monthly service charge
- ▶ No required daily balance
- ▶ Interest paid on all collected balances (rates will vary)
- ▶ 50% discount on safe deposit boxes
- ▶ Free, unlimited checks
- ▶ Free online and mobile banking
- ▶ Free bill pay
- ▶ Free CardValet
- ▶ Minimum Opening Deposit: \$100
- ▶ Direct deposit required



Business:

Business Checking

A checking account designed for businesses.

- ▶ Free Online and Mobile Banking
- ▶ Free Bill Pay
- ▶ Free Positive Pay to prevent check fraud
- ▶ Free Mobile Deposit
- ▶ Minimum opening deposit: \$100

Business Checking - with interest

An interest-bearing account available to businesses.

- ▶ Free Online and Mobile Banking
- ▶ Free Bill Pay
- ▶ Minimum opening deposit: \$100



Savings:

Savings Account

An interest-bearing account.

- ▶ No monthly service charge with an average daily balance maintained of \$300
- ▶ Interest paid on all collected balances (rates will vary)
- ▶ Minimum Opening Deposit: \$100

Money Market:

Personal Money Market Account

Competitive interest rates set weekly. Accounts with daily balances of \$25,000+ will earn a higher rate than those with less than \$25,000.

- ▶ No monthly service charge (with a balance of at least \$2,500)
- ▶ Interest paid on all collected balances (rates will vary)
- ▶ \$2,500 minimum opening deposit
- ▶ Terms and rates will vary



Certificates of Deposit:

With Certificates of Deposit, money is insured and earning interest. The longer the term, the more money earned.

- ◆ \$1,000 minimum balance and opening deposit*
- ◆ *Penalty for early withdrawal equals the amount of 60 days interest for CD's of one year or less in duration and 90 days interest for CD's of more than one year.
- ◆ *Terms and rates will vary

Individual Retirement Accounts (IRAs):

IRAs are a valuable resource in helping reach retirement savings goals. IRAs are offered using Certificates of Deposit with very competitive yields.

- ◆ \$500 minimum balance/opening deposit*
- ◆ *Penalty for early withdrawal equals the amount of 60 days interest for CD's of one year or less in duration and 90 days interest for CDs of more than one year.



Safe Deposit Boxes:

Sanibel Captiva Community Bank offers safe deposit rentals to protect a customer's valuable documents and personal property.

BOX SIZE	ANNUAL RENTAL FEE:
3" x 5"	\$25.00
5" x 5"	\$30.00
3" x 10"	\$35.00
5" x 10"	\$50.00
10" x 10"	\$100.00

OTHER RELATED CHARGES:	FEE:
Lost key replacement	\$25.00
Drill box charge	\$150.00



Cost of Other Services:

Service:	Fee / Comments:
Account balancing (per hour)	\$20.00
Account closed with 90 days of opening	\$20.00
ATM transactions at other banks	\$1.00
ATM transactions at Presto and AllPoint	No charge
Bond coupon processing (per envelope)	\$5.00
Bond coupons returned	(Correspondent charges)
Cashier's checks:	
Customer	\$5.00
Non-customer (exchange of check only)	\$10.00
Check printing charges	Varies with style
Collection Fees:	
Outgoing	\$10.00
Incoming	\$10.00
Dormant account (per month)	\$5.00
Accounts considered dormant after:	
Checking	1 year
Savings & Money Markets	2 years
Fax (per page)	\$2.00
Legal services (plus attorney fees)	\$100.00
Medallion Stamp (signature guarantee)	\$20.00
Night drop key deposit	\$5.00
Notary fee (non-customer)	\$10.00
NSF*	\$32.00
Online Banking monthly fee:	
Personal Online Banking with Bill Pay	No charge
Business Online Banking with Bill Pay	No charge
Business Online Banking w/ Treasury Mgmt. Service	\$20.00
Photocopies (per page)	\$0.50
Replacement of lost Debit / ATM cards	\$5.00
Research (per hour)	\$30.00
Per copy	\$2.00
Returned deposited item	\$10.00
Rolled coin	No charge
Snapshot statement	\$2.00
Stop payment	\$32.00
Telephone transfers	\$1.00
Wire Transfer (customers only):	
Outgoing	\$20.00
Incoming	\$8.00
Foreign outgoing	Correspondent charges

* This non-sufficient funds (NSF) fee applies to paid overdrafts created by check, in-person withdrawal, or other electronic means, as applicable.



Loan Products:

Sanibel Captiva Community Bank offers a full line of loan products for all lending needs. With both fixed and variable interest rates available, loan services include:

- Consumer Loans to Individuals
- Personal Lines of Credit

- Residential Mortgage – Purchase Money
- Residential Mortgage – Refinance
- Residential Bridge Loans
- Residential Real Estate Mortgages on a pass-through, secondary-market basis
- Construction only financing
- Construction/Permanent financing
- Lot Loans

- Home Equity Lines of Credit

- Overdraft Protection Line of Credit

- Commercial Term Loans to Individuals and/or their Business Interests
- Business Lines of Credit
- Commercial Real Estate Loans
- Commercial Real Estate – Construction
- Letters of Credit



Other Products:

Automatic Teller Machine (ATM)

Sanibel Captiva Community Bank is a member of the STAR, CIRRUS and PLUS ATM networks. ATM cards can be used at over 350,000 ATM machines worldwide and at any store with a point-of-sale (POS) STAR terminal. At present, the Bank has an ATM machine located at seven of its eight branch offices. One ATM (located at the McGregor branch) is temporarily closed due from damages sustained from Hurricane Ian. The Bank also has two offsite ATMs located at Gartner (near Gateway branch) and a new ATM at Amavida retirement community since the end of September 2023. Visa debit cards can also be used without charge at any Publix 'Presto' ATMs and AllPoint machines.

Bank by Mail

The Bank processes transactions sent by mail and receipts are returned by mail.

Internet Banking

The Bank's website, www.sancapbank.com provides customers with 24-hour access to all their accounts. Customers can review account balances and check activity, initiate transfers between accounts, pay bills, download information to Quicken/Quickbooks or Microsoft Money. Also available - Zelle, Mobility Banking, Wire Manager, ACH Manager, Remote Deposit Capture (RDC), and Business Mobility. The Bank also offers e-statements to its customers. The Bank has also expanded its social media communication to its customers and the public via Facebook, X (f/k/a Twitter), and LinkedIn.

Night Depository System

A night depository drop is provided on the premises of each branch location for convenience to make deposits after banking hours. At the present time, the night depository drop at the McGregor branch is unavailable due to damages incurred from Hurricane Ian.

Cashier's Checks

The Bank provides cashier's checks available for purchase for customers only.

U.S. Savings Bonds

Sanibel Captiva Community Bank can assist customers to purchase U.S. Savings Bonds from the U.S. Treasury. U.S. Savings Bonds can be redeemed at any branch location.

Visa Debit Cards

Debit cards allow withdrawal of funds from a checking account without having to write a check, thereby enabling products and services to be purchased where debit cards are accepted. Since August 2016, the Bank offers Card Valet, providing card holders access to a variety of controls from their smartphones that can help determine when, where and how their cards are used as well as additional security to help prevent debit card fraud. Instant Issue debit cards are also available at all branch locations.

Wire Transfers - The Bank can wire funds in any amount in an easy and secure way for customers.



Hours of Operation

OFFICE:	HOURS:	
Main Office	Lobby: Monday through Thursday	9:00am – 4:00pm
	Friday	9:00am – 5:00pm
	Saturday	Closed
	Drive Thru: Same as lobby hours	
Branch Offices	Lobby: Monday through Thursday	9:00am – 4:00pm
	Friday	9:00am – 5:00pm
	Saturday	Closed
	Periwinkle Branch – Drive Thru:	None
	McGregor Branch – Drive Thru:	Same as lobby hours
	Winkler Branch – Drive Thru:	Same as lobby hours
	College Branch – Drive Thru:	None
	Downtown Branch – Drive Thru:	None
	Gateway Branch – Drive Thru:	Same as lobby hours
	Bridge Branch – Drive Thru:	Same as lobby hours
Operations Center	Monday through Friday	8:30am – 5:00pm



Assessment Area

The Bank's lending assessment area is represented of all Lee County, Florida:

LEE COUNTY GEOGRAPHIES <u>INCLUDED</u> IN ASSESSMENT AREA								
3.03	13.00	19.18	103.06	108.01	401.11	402.06	502.05	505.01
3.04	14.01	19.19	103.07	108.02	401.13	402.07	502.06	505.02
3.05	14.02	19.20	103.08	108.03	401.17	402.08	502.07	506.01
3.06	15.01	19.21	103.09	201.02	401.18	402.09	502.08	506.03
4.01	15.02	19.22	104.04	201.03	401.20	402.10	502.10	506.04
4.02	16.01	19.23	104.11	201.04	401.21	402.11	502.11	601.01
5.02	16.02	101.04	104.12	202.01	401.22	402.12	502.12	601.02
5.03	17.01	101.06	104.13	202.02	401.23	403.01	502.13	602.01
5.04	17.05	101.07	104.14	203.01	401.24	403.02	503.05	602.02
6.00	17.06	101.08	104.15	203.02	401.25	403.03	503.06	602.03
7.00	17.08	101.09	104.16	204.00	401.26	403.04	503.11	603.00
8.00	17.09	101.10	104.17	205.01	401.27	403.05	503.12	701.01
9.00	17.10	101.11	104.18	205.02	401.28	403.08	503.15	701.02
10.01	17.11	101.12	104.19	206.00	401.29	403.10	503.16	702.01
10.02	18.01	101.13	104.20	207.00	401.30	403.11	503.17	702.02
11.01	18.02	102.03	104.21	208.01	401.31	403.12	503.18	801.00
11.03	19.03	102.05	104.22	208.02	401.32	403.13	503.19	802.02
11.04	19.08	102.06	104.23	301.00	401.33	403.14	503.20	802.03
12.03	19.10	102.07	105.01	302.01	401.34	403.15	503.21	802.04
12.04	19.11	102.08	105.03	302.02	401.35	403.16	503.22	803.00
12.05	19.12	102.09	105.04	302.05	401.36	501.03	503.23	901.00
12.06	19.13	102.10	106.01	303.00	401.37	501.04	503.24	9800.00
12.07	19.15	103.02	106.02	401.08	401.38	501.05	503.25	9900.00
12.08	19.16	103.03	107.01	401.09	401.39	501.06	504.01	
12.09	19.17	103.05	107.02	401.10	402.05	502.04	504.02	



HMDA Disclosure Statement

Since 2006, the Bank's annual Home Mortgage Disclosure Act (HMDA) Statement is provided by the Federal Financial Institutions Examination Council (FFIEC).

The HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's Web site at www.consumerfinance.gov/hmda.



Loan-to-Deposit Ratio

Year	Quarter Ending	Loan-to-Deposit Ratio
2003	March 31	87.92%
	June 30	71.72%
	September 30	79.11%
	December 31	87.29%
2004	March 31	83.56%
	June 30	89.64%
	September 30	102.34%
	December 31	97.43%
2005	March 31	84.93%
	June 30	103.20%
	September 30	113.64%
	December 31	107.98%
2006	March 31	112.40%
	June 30	106.16%
	September 30	102.90%
	December 31	104.95%
2007	March 31	101.44%
	June 30	104.96%
	September 30	108.28%
	December 31	113.63%
2008	March 31	110.34%
	June 30	108.15%
	September 30	113.78%
	December 31	109.45%
2009	March 31	107.75%
	June 30	110.02%
	September 30	110.51%
	December 31	100.30%



Loan-to-Deposit Ratio

Year	Quarter Ending	Loan-to-Deposit Ratio
2010	March 31	99.26%
	June 30	100.47%
	September 30	105.38%
	December 31	103.26%
2011	March 31	96.16%
	June 30	94.52%
	September 30	98.67%
	December 31	101.32%
2012	March 31	86.52%
	June 30	89.44%
	September 30	97.72%
	December 31	99.34%
2013	March 31	98.32%
	June 30	99.88%
	September 30	98.21%
	December 31	100.27%
2014	March 31	93.68%
	June 30	98.00%
	September 30	100.50%
	December 31	101.50%
2015	March 31	94.67%
	June 30	93.06%
	September 30	103.03%
	December 31	109.79%
2016	March 31	100.32%
	June 30	93.97%
	September 30	100.36%
	December 31	107.10%



Loan-to-Deposit Ratio

Year	Quarter Ending	Loan-to-Deposit Ratio
2017	March 31	96.92%
	June 30	100.85%
	September 30	101.78%
	December 31	97.96%
2018	March 31	90.49%
	June 30	97.40%
	September 30	106.67%
	December 31	101.20%
2019	March 31	94.89%
	June 30	98.82%
	September 30	103.33%
	December 31	99.03%
2020	March 31	99.64%
	June 30	97.79%
	September 30	96.92%
	December 31	87.12%
2021	March 31	70.76%
	June 30	63.85%
	September 30	63.75%
	December 31	66.03%
2022	March 31	60.34%
	June 30	73.38%
	September 30	84.14%
	December 31	87.85%
2023	March 31	90.84%
	June 30	88.94%
	September 30	91.29%
	December 31	91.67%
2024	March 31	94.64%
	June 30	95.09%
	September 30	99.33%
	December 31	104.29%



Loan-to-Deposit Ratio

Year	Quarter Ending	Loan-to-Deposit Ratio
2025	March 31	99.18%
	June 30	
	September 30	
	December 31	

Note: The Bank's loan-to-deposit ratio is calculated by dividing the Bank's net loans and leases by its total deposits.