



SEACOAST COMMERCE BANK

COMMUNITY REINVESTMENT ACT

2014 –2018

STRATEGIC PLAN

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Letter from the CEO

The Community Reinvestment Act of 1977 (“CRA”), was created to encourage depository institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods. Our community, also known as our assessment area, encompasses the markets around our full-services branches, or San Diego County.

Neither the CRA, nor its implementing regulations, give specific criteria required of depository institutions toward meeting the credit needs of their assessment area. Rather, the law indicates that the process for meeting CRA obligations should accommodate an institution's individual circumstances.

The CRA regulation contains an option for banks called the "strategic plan". This option allows an institution to develop a plan, with community input, detailing how the institution proposes to meet its CRA obligations. The plan is tailored to the needs of the community using direct community input at the development stage. The institution informally seeks suggestions from the public while developing the plan and once developed it must publish notice of the plan and solicit written public comment for at least 30 days. After the comment period, the institution submits the plan to its regulator for review and approval.

Seacoast Commerce Bank is a leading lender to small businesses throughout the Western United States and currently has eleven loan production offices outside its assessment area and one loan production office inside its assessment area. As such, the amount of lending inside our assessment area, as opposed to outside our assessment area, is limited.

Although lending inside our assessment area is limited (less than 50% of our overall lending), Seacoast Commerce Bank is one of the top lenders to small businesses within our assessment area, compared to other banks headquartered in San Diego.

In order to ensure the Bank meets its responsibilities under the CRA, the Bank is implementing this Strategic Plan (the “Plan”).

The Plan covers the five years from March 1, 2014 through February 28, 2018, and sets specific benchmarks for the bank to achieve to help meet the needs of our community through lending, investment, and activity goals.

The Plan will include working in partnerships with community organizations to ensure the needs of small businesses are being met, along with the revitalization of low- and moderate-income areas within our assessment area. We will achieve this by promoting the availability of small business loans, financial education and affordable housing.

To develop the Plan, management took the following steps:

- We evaluated the Bank, including the current business model, relevant financial information, business strategy, products, performance context and competitive environment.
- We considered assessment area demographic information and economic conditions.
- We then assessed the community development and credit needs of the San Diego community. During this phase of development we evaluated various resource material and interviews with, or presentations from, representatives of community development agencies.
- Finally, we developed the strategic goals for the Bank's lending, investment, and service activities. The goals are responsive to the needs of the community and appropriate within the Bank's performance context.

The plan was amended in 2016 following the closure of the Bank's Glendale Branch. The demographics, data and goals in this version plan reflect that update. A copy of the original plan is available upon request.

We also believe the Bank's assessment area is appropriately delineated. The assessment area consists of the entire county of San Diego. The assessment area includes the census tracts where our branch offices are located and does not arbitrarily exclude low- and moderate-income areas.

We invite your comments relating to our plan. Individuals with questions or comments may contact us at:

Seacoast Commerce Bank
11939 Rancho Bernardo Road, Suite 200
San Diego, CA 92128
Attention: Richard Sanborn, President & CEO
Phone: 858-432-7000
Email: rsanborn@sccombank.com

A. About Us

a. Main Office Information

Seacoast Commerce Bank's (the "Bank") corporate headquarters is located at 11939 Rancho Bernardo Road, Suite 200, San Diego, California, 92128. The Bank has a full-service retail branch located at 678 3rd Avenue, Suite 101, Chula Vista, CA, 91910. All branches are open from 9:00 a.m. until 5:00 p.m., Monday through Friday.

b. Background

The Bank opened for operation in June of 2003 in Chula Vista, California, as a single branch bank, and now operates full-service branches in San Diego and Chula Vista, California. As of March 2016, the Bank had twelve loan production offices located in the following metropolitan areas: San Diego, Orange County, Los Angeles, Sacramento and San Francisco Bay Area, in California; Denver, Colorado; Dallas/Ft. Worth and Houston, Texas; Phoenix, Arizona; Las Vegas and Reno, Nevada; and Seattle, Washington, all of which are serviced by our SBA Operations Department in San Diego, California.

The Bank is a California State Chartered bank, and is regulated by the California Department of Business Oversight (the "DBO"), and by the Federal Reserve. The Federal Deposit Insurance Corp. (the "FDIC"), insures our deposits up to the amount allowable by law.

The Bank is wholly owned by Seacoast Commerce Banc Holdings, a bank holding company, publically owned and trades under the symbol SCBH. QB. There are approximately 550 shareholders with approximately 5.8 million shares outstanding as of February 29, 2016. Directors and Officers own approximately 41% of the outstanding shares.

The Bank focuses on providing loans to small businesses to buy, construct, and/or refinance commercial real estate that houses their business (owner-occupied properties), through the U.S. Government's Small Business Administration ("SBA") lending programs.

To fund loans, the Bank focuses on obtaining deposits from local businesses and individuals in the markets around our branches, and through a specialty deposit division that focuses on the banking needs of property management companies and homeowners' associations ("HOA").

For the year ended December, 31, 2015, the Bank's Report of Condition and Income ("Call Report") filed with the FDIC, reported total assets of \$514.7 million, total loans of \$396.4 million, total deposits of \$464.0 million, and total shareholders equity of \$44.0 million. The Bank has always been designated as "well-capitalized", the highest designation for capital levels given by the FDIC. As of December 31, 2012, the Bank's Tier 1 Capital Ratio was 8.23%, and its total risk-based capital ratio was 20.54%, substantially above the well-capitalized benchmarks of 5.0% and 10.5% respectively.

c. Our Vision and Mission

Our short-term strategic vision for the next three-years is to grow the Bank by retaining SBA loans, which will provide financial stability, in a safe and sound manner. In the past, we sold our SBA loans for a nice premium. While this generated strong income, holding loans, over time, provides more predictable and stable interest income, which provides more stability.

Our Bank is in the business of originating SBA loans and servicing the banking needs of Homeowners' Associations and Property Management firms. We will be one of the top SBA loan originators in the Nation.

We will build a strong balance sheet with low-risk earning assets, funded with low-cost deposits. We will satisfy our regulators while generating a strong return for our shareholders.

Our Mission is to provide our clients with exemplary service; we will offer our clients the profitable products and services they need, in a manner, structure, and cost that is appropriate for both the client and the bank. We will do it faster and better than anyone else.

We will provide our employees with an environment in which they can excel; we will provide them with the tools necessary to compete and win. We will be supportive; we will give them authority, with accountability; we will be one team, working together to achieve our Vision.

We will provide an exceptional return for our shareholders, while operating in a safe and sound manner.

Our Mission will only be accomplished through a solid commitment by our Board of Directors, management and employees to concentrate our business activities toward high-caliber profitable client relationships, with a thorough understanding of banking needs.

d. Products

Seacoast Commerce Bank offers two types of SBA-affiliated loans, and various non-SBA commercial loans. The Bank is currently focused on SBA lending. As the Bank continues to grow, it is estimated that approximately 80%-90% of the Bank's loan portfolio will consist of SBA-affiliated loans. The remaining 10%-20% will be commercial Loans.

Credit Products

SBA Loans

The Bank is a Preferred Lender (PLP status) for the U.S. Small Business Administration. This PLP status provides a lender with delegated credit approval authority on behalf of the SBA, which allows the Bank to better respond to and serve its borrowers.

The following are descriptions of the SBA loan types made at the Bank:

SBA 7(a) Loan

The SBA 7(a) Guaranty Loan program has a maximum loan amount of \$5,000,000, of which a maximum of \$3.75 million will be guaranteed. The guaranty percentage varies, with 85% of the loan amount being guaranteed for loans up to and including \$150,000, and 75% being guaranteed on loans over \$150,000. The Bank utilizes the SBA 7(a) Program for small business borrowers for acquisition, construction, permanent financing, and in some cases, refinancing. The Bank will also make unsecured 7a working capital loans in a maximum amount of \$25,000 each. These small loans will be referred to as Micro SBA 7a Loans.

SBA 504 Loans

This SBA 504 loan program is used only for acquisition, expansion, and construction of owner-occupied commercial real estate. This program is structured where the bank provides a conventional 1st mortgage loan, and the SBA a 2nd mortgage loan, fully funded by the SBA and fully subordinate in both payment and liquidation to the 1st mortgage. The typical structure is 50% loan-to-value financing by the lender, 40%

loan-to-value 2nd financing by the SBA, and the remaining 10% in the form of equity from the small business owner.

Non-SBA-Affiliated Loan

The Bank will offer limited conventional commercial loans to borrowers based on the soundness of the borrower's historical financial information and business model. Examples of conventional financing would include business lines of credit, business term loans, and commercial real estate financing.

The Bank does not offer any consumer loan products.

Deposit Products

The Bank offers a full suite of traditional deposit products including checking accounts, savings accounts, money-market accounts, and certificates of deposits, all of which provide FDIC insurance protection up to the fullest amount allowable by law.

In addition, the Bank offers a full suite of cash management products and services needed to meet the banking needs of its clients, including on-line banking, remote deposit capture, and lockbox payment processing.

e. Banking Markets

The Bank focuses its deposit generation business in two areas; 1) soliciting commercial deposits from business clients within the markets surrounding the branches; and 2) soliciting property management and HOA clients throughout the Western United States.

The Bank focuses its lending business throughout the Western United States through loan production offices ("LPO's") located in California, Arizona, Nevada, Texas, Colorado and Washington.

f. Competition

The Bank faces strong competition from numerous existing banks, credit unions and finance companies. According to the FDIC State profile, 3rd quarter 2012, there were 59 financial institutions in the San Diego-Carlsbad-San Marcos, CA market, with a combined \$60.9 billion in deposits.

The eight (8) largest depository institutions with a main office located in San Diego County as of December 31, 2015 are as follows:

Name	City	Assets (000)
SILVERGATE BANK	LA JOLLA	\$948,570
SEACOAST COMMERCE BANK	SAN DIEGO	\$514,790
SAN DIEGO PRIVATE BANK	LA JOLLA	\$454,955
BANK OF SOUTHERN CALIFORNIA	SAN DIEGO	\$344,322
BALBOA THRIFT AND LOAN	SAN DIEGO	\$215,434
HOME BANK OF CALIFORNIA	SAN DIEGO	\$136,090
RANCHO SANTA FE THRIFT & LOAN	SAN DIEGO	\$66,492
NEIGHBORHOOD NATIONAL BANK	SAN DIEGO	\$61,123

San Diego Business Journal

This listing above does not include the major National banks that have numerous competing branches in San Diego County. Many of our competitors have large advertising budgets, offer a large number of consumer and commercial banking products, and also strive to meet the needs of the local communities.

In spite of strong competition, the Bank has successfully granted a substantial amount of small business loans to small businesses. The Bank ranked 10th in the Nation for all SBA 7(a) lenders, according to the U.S. Small Business Administration, for the twelve months ended September 30, 2015 (SBA.gov 09/30/2015).

The top 10 SBA lenders nationwide are listed below:

Financial Institution	Approved Gross Loans (000)
WELLS FARGO & COMPANY	\$1,918,439
LIVE OAK BANKING COMPANY	\$1,148,420
U.S. BANK NATIONAL ASSOCIATION	\$776,361
JPMORGAN CHASE BANK, NA	\$753,770
THE HUNTINGTON NATIONAL BANK	\$672,841
CELTIC BANK CORPORATION	\$499,432
RIDGESTONE BANK	\$474,329
SUNTRUST BANK	\$364,656
NEWTEK SMALL BUSINESS FINANCE, Inc.	\$355,661
SEACOAST COMMERCE BANK	\$293,551

Within the SBA's San Diego District Office, for San Diego headquartered banks, Seacoast Commerce Bank has been a top lender to small businesses over the past year as follows:

FY E 2015 – 7(a) Lenders List as of 09/30/2015 – San Diego, CA

Bank Name	#Loans	Dollars Approved
Wells Fargo Bank	206	\$67,653,400
U.S. Bank	159	34,349,900
Pacific Commerce Bank	49	34,163,500
Live Oak Banking Company	16	24,274,500
Seacoast Commerce Bank	28	18,633,200
JP Morgan Chase Bank	83	14,859,100
Plaza Bank	11	12,008,200
Bank of Southern California	21	10,932,000
San Diego Private Bank	32	9,583,000
Celtic Bank Corporation	32	8,941,800

Seacoast Commerce Bank has made a concerted effort to be a top lender to small businesses in its market area so that the needs of the community can be supported.

As evidenced, Seacoast has been one of, if not the top lender in the San Diego area helping to meet the needs of the local community.

B. Historical CRA Performance

The Board of Directors has designated a CRA Officer and established a CRA Committee. The Committee meets as needed to monitor and discuss activities relating to the Bank's performance relating to its obligations under the CRA. The Compliance Officer provides reports to the Board of CRA activities and performance.

The Bank's CRA Program is governed by the CRA Policy that is reviewed and approved annually by the CRA Committee and by the Board of Directors. The Bank's CRA Officer is responsible for the administration of the program, and reports progress to the CRA Committee, as well and to the Board of Directors.

Over the last five years (2010-2015) the Bank has been examined for CRA compliance twice, in June 2010, and received a satisfactory rating, and most recently in April 2015, and received an outstanding rating. According to the Federal Reserve, an institution in this category has an outstanding record of helping to meet the credit needs of its assessment area. As outlined in its approved CRA Strategic Plan for 2014, SCB met or exceeded the goals in all performance categories in order to achieve an outstanding rating.

During this examination the Federal Reserve commented:

- An outstanding level of community development loans supporting the revitalization and stabilization of low- and moderate-income geographies and affordable housing.
- An outstanding level of community development investments and services were provided to organizations that helped address social service needs of low and moderate-income individuals.
- A more than reasonable distribution of small business loans in low- and moderate-income geographies of different income levels and percentage of lending to small businesses with gross annual revenues of less than or equal to one million dollars.
- SCB did not receive any complaints relating to its CRA performance.

Lastly, there was no evidence of violations of the substantive provisions of anti-discrimination and fair lending laws and regulations, or of other credit practice rules, laws or regulations identified during the consumer compliance examination conducted concurrently with this CRA performance evaluation.

C. Seacoast Commerce Bank's Strategic Plan: Overall Goals, Effective Date and Term

Seacoast Commerce Bank is an FDIC-insured financial institution subject to the rules and regulations of that agency, including regulations under the Community Reinvestment Act ("CRA"). Congress passed the CRA in 1977. In 1995, current interagency regulations implementing the CRA became effective. For small banks, such as Seacoast Commerce Bank, these regulations utilize a lending test that measures and evaluates a bank's lending activity within its designated assessment area. The lending test does not, however, adequately consider the situation of a banking operation such as Seacoast Commerce Bank, who serves customers throughout a broad region and who does not have significant concentrations of its loan and deposit portfolios within its designated assessment area. As an alternative to this standard evaluation method, regulations permit an insured institution to comply with CRA by electing to implement an approved strategic plan. Accordingly, the Bank has elected to operate under this strategic plan in order to satisfactorily fulfill its CRA obligations.

a. Goals

The management of the Bank has set a goal of meeting or exceeding the metrics outlined below for satisfactory lending, investment, grants, and service levels, in each of the years covered by this Plan. It is the Bank's intention that through meeting these goals we will also help to meet the needs of the community within our assessment area. The Bank has identified the following areas within which to concentrate its CRA efforts:

- Small business lending;
- Affordable housing;
- Community Services for Low Income Families;
- Protection of women and children.

b. Effective Date

The Bank received approval for the strategic plan from the FDIC on April 14, 2014. The Bank's Board of Directors and management team will oversee the Bank's progress in meeting the Plan's objectives. The Bank submitted a revised plan to the FRB in July 2016 based on the closing of our only branch in Los Angeles County and the need to revise our Assessment Area. The goals for the revised plan will be in effect for 2017-2018. The Bank will request FRB approval to modify or amend the Plan again only if there is a material change in its underlying assumptions or in Seacoast Commerce Bank's mission, objectives, or operations, and such changes would make the Plan no longer

appropriate or viable. In such event, Seacoast Commerce Bank would administer the modified or amended Plan in accordance with the FRB regulatory requirements, timeframes, and guidelines for approval of a CRA strategic plan.

c. Term

The Bank plans to operate under this strategic plan and amendments for the years of 2014-2018. Any proposed changes to the plan will follow the appropriate procedures for approval and notification. A new strategic plan may be developed for the Bank when this term has expired.

D. Seacoast Commerce Bank Assessment Area

Seacoast Commerce Bank has one CRA assessment area, San Diego County. San Diego County in California (MSA 41470), is served by our Main office and Chula Vista branch office. We believe that the assessment area is appropriately delineated, in compliance with CRA requirements, and consistent within the Bank’s performance context.

San Diego County Assessment Area

Based on 2010 census figures, and 2012 Dunn & Bradstreet information for same data, the total population of San Diego County is 3,095,313 and the number of households is 1,061,789¹. The estimated median family income is \$63,069.

The number and percentage of households that fall into these income classifications are:

Tract Income	% of Households
Low Income	8.3%
Moderate Income	20.1%
Middle Income	35.9%
Upper Income	35.7%
Total	100%

San Diego County contains 628 census tracts or geographic areas. The income levels are classified as follows:

Assessment Area by Census Tract Income Level		
Income Level	Total # of Tracts	% of Total Tracts
Unclassified	6	1.0%
Low	63	10.0%
Moderate	134	21.0%
Middle	227	36.2%
Upper	198	31.5%
Total Tracts	628	100%

As to businesses, the percentage of businesses by Census Tract is listed below. Of all the businesses in San Diego County, 21.5% are located in low or moderate income census tracts. This was considered when developing the sub-goals for this plan, to ensure that we adequately addressed the needs of those businesses in low and moderate income areas.

¹ www.quickfacts.census.gov

Businesses by Census Tract Income in Assessment Area	
Census Tract Income Level	2012 D&B
Low	5.8%
Moderate	15.9%
Middle	35.5%
Upper	42.8%
N/A	.01%
Total	100.0

Below is the breakdown of business by Gross Annual Revenue within the Assessment Area.

Businesses by Gross Annual Revenue in Assessment Area	
Gross Annual Revenues	2012 D&B
< \$1 Million	73.1%
> \$1 Million	3.6%
Not Applicable	23.3%
Total	100.0%

There are no legal constraints or non-standard limitations that affect the types of loans, investments, or services to be offered by the Bank. However; the internal business plan for the Bank, which was considered in the goals that are set forth under this plan, does limit the types of businesses, locations, and property types that we will lend to.

E. A Strategic Plan Performance Goals and Standards for 2014-2018

a. Targeted Need

The Bank's CRA Strategic Plan goals were established to make an appropriate and meaningful contribution to meeting the needs of the families and communities within the assessment area. Because of the Bank's Western U.S. deposit gathering and loan origination strategies, the Bank has chosen to focus its efforts on community development services, investments, and lending.

Our goals are weighted higher in the lending and investment areas. This is based upon the needs expressed by the community groups during our community development assessment.

Identified targeted needs are:

- **Promote Economic Development** — several enterprises have been identified that promote economic development by aiding small businesses within the assessment area.
- **Support Affordable Housing** - The Bank will participate in and support activities that provide revitalization to targeted zones within the Bank's assessment areas by providing affordable housing and shelter for people in need.
- **Contribute to Community Development Enterprises** — The Bank has identified community development organizations that are in need of grants to support their office services and administrative functions.
- **Seek Small Business Lending** — The Bank will continue to seek out opportunities to lend to small business, within its assessment areas, that have gross annual revenues of less than \$1,000,000, and who would not be able to obtain financing through a traditional financing institution.

b. Lending Goals and Standards

Based on our projected asset size and financial situation, we have established the following measurable lending goals. The goals have been stated as a percentage of our average assets in terms of a combined CRA qualified lending goal. Rather than choose a progressive goal (as was observed in other agency approved plans), we have chosen to tie our goal to our asset size so it will grow as the bank does. These goals include all new loans within our assessment area that are CRA qualified, including, but not limited to, small business loans and Community Development Loans originated or renewed within our assessment area in the given year. Our overall CRA Qualified Lending Goal will be split

with 60% of our lending goal being Community Development Loans and 40% Small Business Lending.

Satisfactory	Loans as a % of Average Assets				
	2014	2015	2016	2017	2018
Overall CRA Qualified Lending Goals	1.250%	1.250%	1.250%	1.250%	1.250%
<ul style="list-style-type: none"> Community Development Loan Goals for San Diego Assessment Area 	0.375%	0.375%	0.375%	0.750%	0.750%
<ul style="list-style-type: none"> Small Business Lending Goals for San Diego Assessment Area 	0.250%	0.250%	0.250%	0.500%	0.500%
<ul style="list-style-type: none"> Community Development Loan Goals for Los Angeles Assessment Area 	0.375%	0.375%	0.375%	0.0%	0.0%
<ul style="list-style-type: none"> Small Business Lending Goals for Los Angeles Assessment Area 	0.250%	0.250%	0.250%	0.0%	0.0%

Outstanding	Loans as a % of Average Assets				
	2014	2015	2016	2017	2018
Overall CRA Qualified Lending Goals	1.500%	1.500%	1.500%	1.500%	1.500%
<ul style="list-style-type: none"> Community Development Loan Goals for San Diego Assessment Area 	0.450%	0.450%	0.450%	0.900%	0.900%
<ul style="list-style-type: none"> Small Business Lending Goals for San Diego Assessment Area 	0.300%	0.300%	0.300%	0.600%	0.600%
<ul style="list-style-type: none"> Community Development Loan Goals for Los Angeles Assessment Area 	0.450%	0.450%	0.450%	0.0%	0.0%
<ul style="list-style-type: none"> Small Business Lending Goals for Los Angeles Assessment Area 	0.300%	0.300%	0.300%	0.0%	0.0%

Sub-lending Small Business Goals

To ensure that we are reaching out to all Businesses within our Assessment Area we are establishing the following sub-lending goals. These sub-lending goals will apply to our Small Business Lending Loans within our Assessment Area. We commit at a minimum to making 30% of our small business loans within our assessment area to businesses with annual revenues below \$1 Million. We also commit to make 25% of our Small Business Loans within our assessment area to businesses located in low or moderate income census tracts. Recognizing that a loan to a business with revenue below \$1MM may

also be located in a low or moderate income census tract, in Query case it will count in both categories.

Loans to Small Businesses	2014	2015	2016	2017	2018
Loans to Businesses with Gross Annual Revenue <= \$1 Million	30%	30%	30%	30%	30%
Loans with LMI tracts	2014	2015	2016	2017	2018
Loans to Businesses located within low or moderate income census tracts.	25%	25%	25%	25%	25%

In order to develop the goal for loans to businesses with gross annual income below or equal to \$1 million, we examined the lending percentages of large banks within our assessment area. The banks reviewed were Bank of America, and US Bank. The percentages are listed in the chart below.

Large Bank Small Business Lending In Assessment Area		
	Loans to Businesses with Gross Annual Revenue below \$1 Million	
	Percentage of Loans by Number	Percentage of Loans by Amount
US Bank	68.4%	36.7%
Bank of America	16.2%	20.6%

Seacoast Commerce Bank based the sub-lending goals for loans to businesses located within low to moderate income census tracts upon the percentage of businesses by census tract income data as shown on page 15.

Large Bank Small Business Lending In Assessment Area		
	Loans in Low-Moderate Income Tracts	
	Percentage of Loans by Number	Percentage of Loans by Amount
US Bank	18.1%	23.9%
Bank of America	22.8%	17.11%

Seacoast Commerce Bank examined other strategic plans to gauge the reasonableness of these goals. We were unable to locate another bank within our market area with a strategic plan, so we looked for banks with a similar business model. The bank with the most similar business model to Seacoast is Live Oak Banking Company, headquartered in North Carolina. Live

Oak also specializes in small business lending, primarily through the SBA program, and lends nationwide. Another strategic plan considered was that of EnerBank, USA. We chose to match the commitments of these institutions despite the fact that they are much larger institutions.

Live Oak Banking Company	2012	2013	2014
Loans as a % of Average Assets – Satisfactory	1.00%	1.10%	1.20%
Loans as a % of Average Assets – Outstanding	1.25%	1.35%	1.45%

EnerBank USA	2011	2012	2013
Loans as a % of Average Assets – Satisfactory	1.25%	1.25%	1.25%
Loans as a % of Average Assets – Outstanding	1.50%	1.50%	1.50%

Crestmark Bank also had a plan similar to SCB, and had a "Satisfactory" Rating goal of 0.60% of assets in 2010 for lending/investment, and .85% of average assets for an "Outstanding" rating goal.

Lending Channels

Seacoast Commerce Bank intends to utilize the following channels for meeting its lending goals. It is important to note that the Bank is not limiting itself to the specific channels described below, nor is it committing to utilize all of the specific channels described below. Thorough research has led us to believe that the following avenues meet the criteria established under the CRA Community Development definitions and restrictions, and are quality organizations dedicated to worthwhile missions.

1) CDC Small Business Finance (CDCSBF)

There are multiple ways Seacoast Commerce Bank can partner with CDC Small Business Finance (CDCSBF). As you may be aware, CDCSBF is more than just the nation's largest SBA 504 lender. For nearly 35 years CDCSBF has provided access to capital to small businesses via a number of other small business lending programs. The primary goal of CDCSBF is working with start-up businesses and businesses located in low-moderate communities. This includes the development of three Community Development Financial Institutions

(CDFI's), 7(a) packaging, the SBA Microloan program and most recently, the SBA 7(a) Community Advantage Program.

There are three programs that SCB Commerce can participate in with CDC Small Business Finance (or its affiliate). An overview of each is below.

SBA 7(a) Community Advantage – in May 2011 CDCSBF was approved as one of the first SBA Community Advantage lenders. This program allows CDFI's, SBA micro lenders and Certified Development Companies to participate in the SBA 7(a) program. The maximum loan size is \$250,000. The target market includes start-ups and businesses located in low-moderate income communities.

To date CDCSBF has had 18 loans approved and 9 funded. It is our understanding that CDCSBF is the leading Community Advantage lender in the country. To fund the loans CDCSBF has secured a line of credit from a national bank. The LOC is just for the guaranteed portion. Funds are currently being solicited for the un-guaranteed portion of the 7(a) loan.

SBA Microloan – CDCSBF has been a participant in this program since 2001. Over the years CDCSBF has financed 139 small businesses for \$4.4 million. Under this program CDCSBF borrows funds from the SBA at a low interest rate and re-lends the funds to small businesses who otherwise cannot obtain a loan from a traditional financial institution. The maximum loan amount is \$50,000.

To borrow funds from the SBA, CDCSBF must establish a 15% Loan Loss Reserve (LLR). Therefore, to borrow and establish a \$600,000 loan pool, CDCSBF must provide a \$90,000 Loan Loss Reserve. CDCSBF is currently in the process of soliciting funds for the LLR. Funds from financial institutions for the LLR are generally in the form of a grant. However, banks can provide a 5 year investment using the COIN Tax Credit Program and receive up to a 20% tax credit on their investment.

Bankers Small Business CDC of San Diego County (Bankers CDC) - Bankers CDC was established in 1992 and is a consortium of nearly thirty banks with deposits in San Diego that joined forces to create loan pools. These loan pools were an effort to give back to the local community by helping small business that do not meet eligibility

criteria for other loan programs. Initially loans from \$7,500 to \$50,000 were made to business owners with good character but that may have had minimal collateral, marginal credit histories or other significant issues standing in the way of traditional or government guaranteed financing.

Banks are participants in the program by investing toward capitalization and loan pools. This provides both lending and investment credit opportunities under CRA regulations. Capital investments (i.e. stock ownership), which cover some of the overhead costs of the operation, are required to be eligible for contributions to the loan pool. In the program's history, seven loan pools have been formed and over \$7.1 million in capital has funded 149 businesses.

Bankers CDC is owned by the member banks and is administered by CDC Small Business Finance. The shareholders elect a board of directors and they provide policy and guidance to the organizations. The daily activities are managed by CDCSBF staff via an administrative agreement. Investment into the pool is open and is for a minimum of 5 years. The investor must first be a shareholder with a minimum of 5 shares. Shares are \$500/share. Investors into the loan pool receive quarterly interest only payments.

2) Small Business Lending

SCB also understands that some of its usual lending activities can be counted for CRA credit. Loans approved for customers within our assessment area which have a commitment amount under \$1,000,000 may qualify as a "small business loan" and those with a commitment amount greater than \$1,000,000 may qualify as a "community development loan" for CRA evaluation purposes.

3) Non-Profit Lending

SCB will explore the possibility of low interest loans to other non-profit organizations serving the housing needs of low-to-moderate income individuals in its assessment area.

c. Qualified Community Investment (Grants) Goals and Standards

SCB intends to meet its investment goals through a combination of grants and donations as it sees appropriate in a given year according to the current

financial position of the Bank. Based on research completed to develop this strategic plan, the following goals have been deemed appropriate for SCB. The investment goals are set as follows:

Satisfactory Goal - SCB	2014	2015	2016	2017	2018
New Grants / Year	\$22,000	\$30,000	\$38,000	\$46,000	\$54,000
Total over 5-years: \$190,000					
Outstanding Goal - SCB	2014	2015	2016	2017	2018
New Grants / Year	\$27,000	\$35,000	\$43,000	\$51,000	\$59,000
Total over 5-years: \$215,000					

In order to measure the reasonableness of these goals, SCB examined the goals of Live Oak Bank and EnerBank, USA. The goals established for these institutions are detailed below.

Satisfactory – Live Oak Bank	2012	2013	2014
Aggregate Dollar Amount of Grants	\$25,000	\$35,000	\$45,000
Satisfactory – EnerBank USA	2011	2012	2013
Aggregate Dollar Amount of Grants	\$13,500	\$13,500	\$13,500

SCB intends to meet its community investment goals by utilizing the channels discussed below. It is important to note that the Bank will not limit itself to the specific channels described below, nor will be committed to utilize all of these avenues.

SCB will explore opportunities to give grants to local organizations that support our CRA goals of 1) affordable housing, 2) community services for low-income families, and 3) the protection of women and children. Organizations must target or predominantly serve low or moderate income individuals. These could include but are not limited to organizations such as shelters/soup kitchens; programs for financial education, literacy or other educational ends; holiday or beginning-of-school drives for children and support for economic revitalization of depressed and underserved areas within the Bank's assessment area. Seacoast Commerce Bank management has already met with several local groups to discuss specific opportunities for grants, including but not limited to:

Senior Housing Crime Prevention Foundation (SHCPF)

<http://www.shcpfoundation.org/>

SHCPF is a national organization which was established to provide a vehicle for banks to earn CRA consideration. It has been used by financial institutions in an

effort to address Lending, Investments, and/or Service credit. This program allows banks to serve an underserved segment of society, low and moderate income senior housing residents.

The sole objective of the SHCPF is to reduce crime in the nation's senior housing facilities and to provide on-going, effective crime prevention programs that promote safe, secure and high quality of life environments for senior housing residents. In part, this objective is accomplished by installing the highly successful Senior Crime Stoppers program in facilities sponsored through CRA investments or loans to the SHCPF. Nationally, the Senior Crime Stoppers program has reduced all incidents of crime in participating senior housing facilities by approximately 94 percent as of June 30, 2015.

The SHCPF is structured to provide the Bank with qualified CRA consideration to address Lending, Investments, and/or Servicing test credit.

Working through SHCPF, Seacoast would focus on Senior Housing Residences who serve low to moderate individuals. Only funds for Community Development would count toward our goal, funds for general operations will not be included for the goal.

South Bay Community Services (SBCS)

<http://southbaycommunityservices.org/>

SBCS has been a part of the San Diego community since 1971, by providing the most comprehensive range of services and programs for families, children and individuals in South San Diego County. SBCS programs are for everyone at any time in their lives when they need it the most. The organization helps at risk Families with transitional housing and also operates the only Emergency Domestic Violence Shelter in South County. SBCS also offers transitional services to youth maturing out of foster care.

SBCS began as "Our House", opened by the City of Chula Vista in an effort to combat the groups of "long-hair" teens who were using and dealing drugs in Memorial Park. Our House was a drop-in center where teen drug users could go for counseling and drug rehabilitation. Its success brought about the need for growth and a board of directors. And grow they did. Soon, Our House came to be called South Bay Community Services and has been growing with the needs of the community ever since. Today, they have a staff of more than 200 with many stationed throughout South San Diego County at shelters, clinics, police departments, schools, affordable housing facilities and family resource centers.

SBCS is a non-profit 501 (c)(3) with a main office located at 1124 Bay Blvd. SBCS Programs include:

- Mi Escuelita Therapeutic Preschool
- 24/7 Emergency Response Unit for Domestic Violence Calls
- Individual, Child, Teen and Family Counseling
- Parenting Classes
- Child Abuse Prevention and Intervention
- After School Programs
- Housing and Support for youth aging out of foster care system
- Shelter and support for homeless families
- Shelter, housing and support for victims of family violence
- Affordable housing
- First-time home buyer assistance
- Fair Housing Assistance
- Economic Development
- Child Developmental Screenings
- Innovative Art Therapy
- Housing for families living with AIDS/HIV

Seacoast will contribute to programs within SBCS which primarily benefit low or moderate individuals.

EverFi

<http://www.everfi.com/>

EverFi provides partnerships with schools to provide online financial literacy education programs to targeted low income students. The program is currently expanding into San Diego County.

EverFi is the leading education technology company focused on teaching, assessing, badging, and certifying students across the country in critical skills. They combine cutting-edge personalized technology, deep education research and data, and a dedicated implementation team that allows each teacher to feel as though they have a blended learning assistant in their classroom. Most importantly, EverFi partners with the private sector and foundations that sponsor this innovation across the country. The Bank can partner with EverFi through corporate sponsorship.

EverFi is headquartered in Washington, D.C. with offices in Boston, San Francisco, and Chicago. They also have team members in Florida, Iowa,

Louisiana, Kentucky, Mississippi, Nebraska, New York, North Carolina, Ohio, Pennsylvania, and Texas.

Through our partnership with EverFi we would target schools that have over 50% of their students who qualify for free or reduced price lunch.

San Ysidro Health Center

<http://www.syhc.org>

SYHC provides comprehensive primary care services and family support programs to over 82,000 registered patients residing in the South and Central/Southeastern Regions of San Diego County annually. In 2012, over 300,000+ patient visits were completed by SYHC's patient population which is highlighted by the following demographics:

- 96% of patients lived below 200% of Federal Poverty Level
- 53% of patients were uninsured
- 45% of patients were ages birth to 19 years of age
- 7% of patients were age 65 and over

d. Service Goals and Standards

Seacoast Commerce Bank, as of January 1, 2016, has 58 employees residing within its San Diego Assessment Area. Seacoast intends to structure its service goal based upon two (2) hours of service per employee per year within our current assessment area. Seacoast Commerce Bank will support the volunteer services of its employees and members of the Board of Directors to various community-based groups that are involved in economic development or other community revitalization efforts. While these services will be focused inside the assessment area, the Bank will also support and acknowledge the efforts of employees who volunteer outside the Assessment Area as well. We understand that to qualify for the goals outlined below the service must:

- Be completed as a representative of the Bank.
- Have Community Development as their Primary Purpose.
- Be related to the provision of Financial Services.

Organizations that Seacoast Commerce Banking is considering as primary conduits for community service for economic development and other community revitalization efforts include, but are not limited to the entities below (see Section E. c. above for further detail on entities):

- San Diego CDC Loans - <http://cdcloans.com/>
 - South Bay Community Services - <http://southbaycommunityservices.org/>
 - EverFi - <http://www.everfi.com/>
 - Senior Housing Crime Prevention Foundation <http://shcpfoundation.org/>
 - San Ysidro Health Center <http://www.syhc.org>
- The goals for service and volunteerism for directors, officers, and employees of the Bank are as follows:

Satisfactory	2014	2015	2016	2017	2018
Hours of Service	2.0 per FTE				
Outstanding	2014	2015	2016	2017	2018
Hours of Service	3.0 per FTE				

The goals for service and volunteerism each year is based on the FTE of employees residing within each of the bank’s Assessment Areas on January 1 and will be allocated based upon the number of employees in each Assessment Area..

The goals established by Live Oak Bank and EnerBank are detailed below for comparison purposes.

Satisfactory – Live Oak	2012	2013	2014
Hours of Service	90	110	130
Outstanding – Live Oak	2012	2013	2014
Hours of Service	140	160	180

Satisfactory – EnerBank	2011	2012	2013
Hours of Service	110	110	110
Outstanding - EnerBank	2011	2012	2013
Hours of Service	145	145	145

F. Public Participation in Development of the Plan

Seacoast Commerce Bank has solicited input from the community through discussions with community development organizations, financial intermediaries and government agencies while developing this strategic plan. The Bank solicited input from entities within the assessment area.

San Diego CDC Loans - <http://cdcloans.com/>

Contact: Robert Villarreal (619) 291-3594

rvillarreal@cdcloans.com

Date of Contact 3/15/12

South Bay Community Services - <http://southbaycommunityservices.org/>

Contact: Erica Johnson

Phone Number: (619)420-3620

Date of Contact: 1/11/12

EverFi - <http://www.everfi.com/>

Contact: Mike Fee (510) 282-7041

mike@everfi.com

Date of Contact: 6/14/12

Senior Housing Crime Prevention Foundation

<http://www.shcpfoundation.org/>

Contact: Sue Shaffer (901) 529-4787

Sue.Shaffer@SHCPFoundation.org

Date of Contact: 6/29/12

San Ysidro Health Center

<http://www.syhc.org/>

Contact: Jacqueline A. Silverman 858-395-7733

Jacqueline.silverman@syhc.org

Date of Contact: 3/7/2013

G. Notice Regarding Public Inspection of the Plan

Seacoast Commerce Bank solicited comments from the community prior to submitting the plan for FDIC approval by posting a notice in the *San Diego Union Tribune* on June 28, 2013, in the *Los Angeles Times* on January 18, 2014 and on the Bank's web-site, www.sccombank.com. Each alerted the community to the creation of the plan and solicited feedback for a 30 day period. The Bank received two comments during the public comment period

I've reviewed Seacoast's strategic plan, and it looks great; the description of EverFi and our work in San Diego and around the country is accurate. EverFi is delighted to partner with Seacoast to bring financial education to underserved communities in the San Diego area.

Mike Fee

*Executive Vice President
EverFi*

This is an excellent document, and I am honored that we are included in the bank's plan. My only recommendation for a change is in paragraph 1, third sentence. I would change the wording to simply read "This program allows banks to serve an underserved segment of society, low and moderate income senior housing residents."

Peter Gwaltney

*Chairman & CEO
Senior Housing Crime Prevention Foundation*

Based upon Mr. Gwaltney's recommendation we slightly altered the paragraph in the plan which provided a description of his organization. This was the only change made to the Strategic Plan following the public comment periods.

H. Notice Regarding Public Inspection of the Plan Revision

Seacoast Commerce Bank solicited comments from the community prior to submitting the plan for Federal Reserve approval by posting a notice in the *San Diego Union Tribune* on April 1, 2016 and on the Bank's web-site, www.sccombank.com. Each alerted the community to the amendment of the plan and solicited feedback for a 30 day period. The Bank received three comments during the public comment period. Below are excerpts, the full letters are available for review.

Please consider this letter as input towards Seacoast Commerce Bank's Community Reinvestment Act Strategic Plan...The Southwestern College Foundation's work to ensure that student from low-income homes and communities have resources and support to pursue their college degree has been benefited greatly because of the investment in these students and their communities by Seacoast Commerce Bank.

Zaneta Salde Encarnacion, MPA
Foundation Executive Director
Southwestern College

San Ysidro Health Center greatly appreciates its historical partnership with Seacoast Commerce Bank and looks forward to its current and future implementation of Seacoast's Community Reinvestment Act Strategic Plan...Most of our patients live at 200% below the Federal poverty level... We value and appreciate the support we receive, both financial and in terms of volunteer hours, from Seacoast Commerce Bank.

Kevin Mattson
President and CEO
San Ysidro Health Center

I met with Melyn Acasio late last week and she shared the Seacoast Commerce Bank's Community Reinvestment Act and Strategic Plan and I do appreciate the opportunity to review it. I feel that the bank is working in a most positive direction for our communities here in Southern California.

Trisha Brereton
Executive Director
Interfaith Shelter Network of San Diego

I. Satisfactory and Outstanding Goals

Seacoast Commerce Bank believes the measurable goals for lending, investment, and service, as specified above, adequately consider the realities of the Bank's current business model and operating environment and meeting these goals constitutes a "Satisfactory" or "Outstanding" performance, as appropriate, under CRA requirements.

J. Ongoing Review of Performance Goals and Standards

Seacoast Commerce Bank recognizes that the lending, investment, and service goals outlined in this strategic plan are based on general assumptions about the Bank's business model and industry as well as general economic conditions. These assumptions and conditions may change. As a result, the Board of Directors, or a committee thereof, will monitor the Bank's performance vis-à-vis these goals on a quarterly basis. Any changes to the plan that are deemed necessary as a result of these quarterly reviews will be made in accordance with the Federal Reserve's requirements, guidelines and approval process. Such changes are only expected to be made if there are significant changes to the underlying assumptions which render the goals contained in this strategic plan no longer viable or appropriate.

K. Election of Alternative Performance Evaluations

Given the significant percentage of loans that are booked outside of the assessment area, Seacoast Commerce Bank would not elect to be evaluated under an alternative assessment method if it fails to achieve a Satisfactory rating under this strategic plan. It is the intent and expectation of management that Seacoast Commerce Bank will meet or exceed all goals established in this plan.

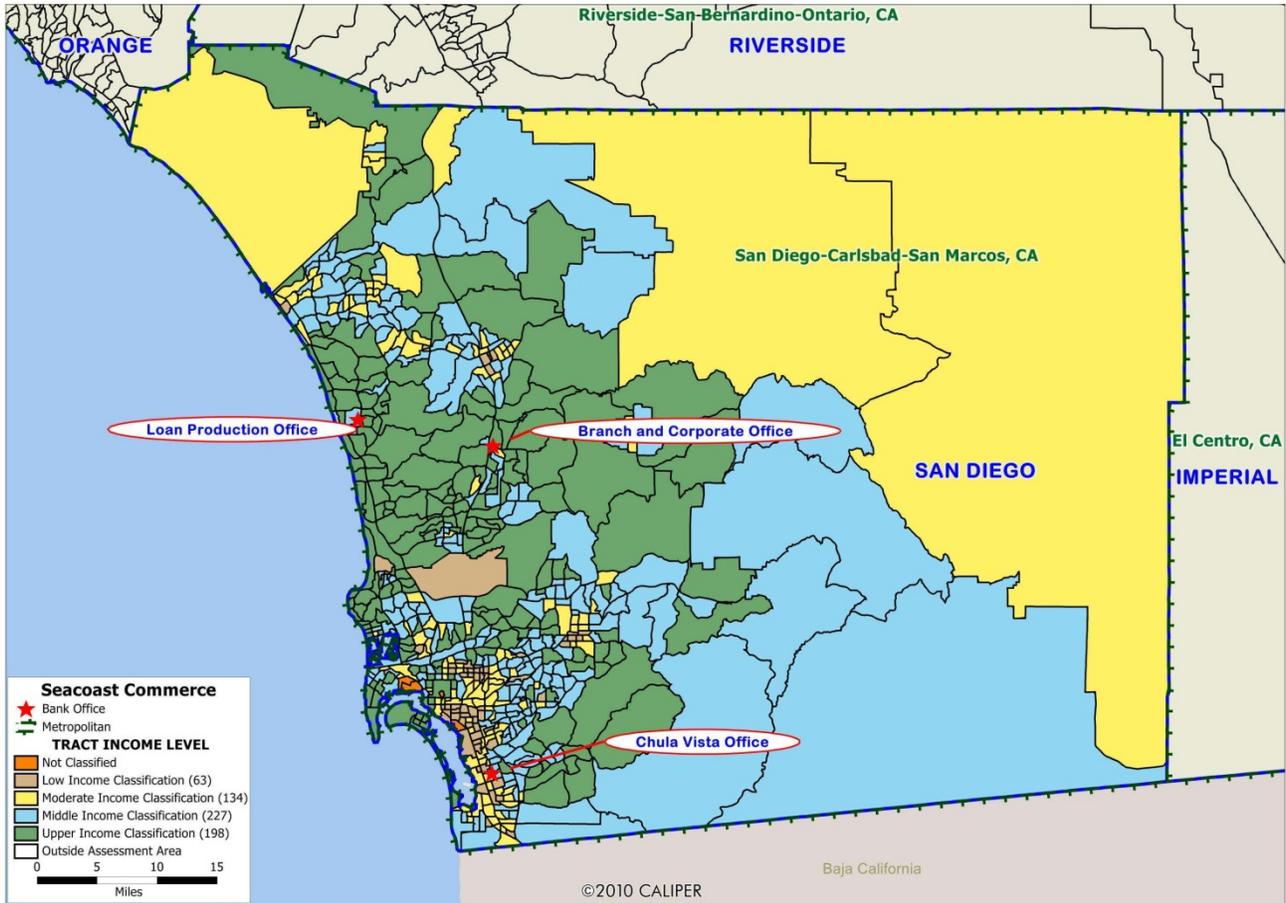
L. Assessment Area Map

SAN DIEGO COUNTY, CALIFORNIA

Seacoast Commerce Bank

CRA Assessment Area

MSA 41740

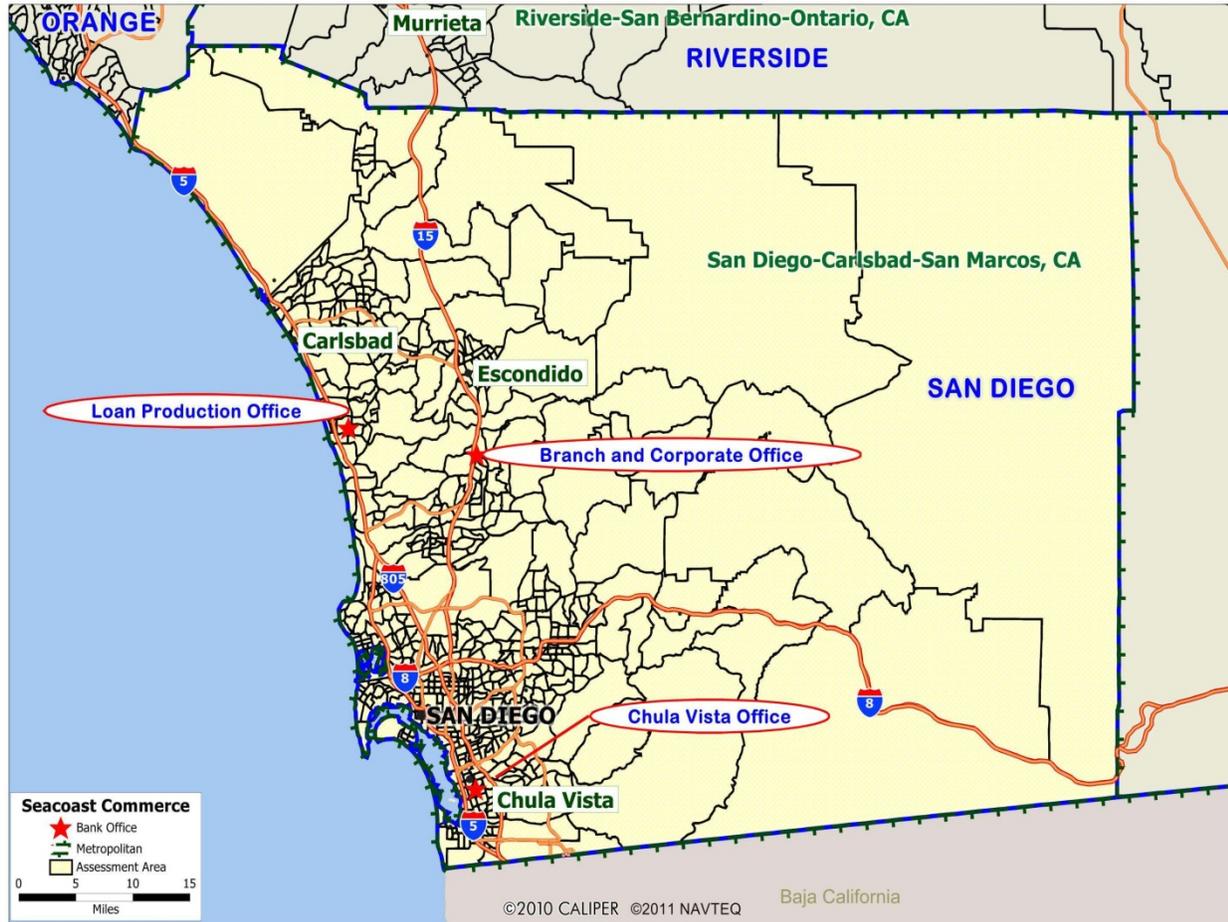


SAN DIEGO COUNTY, CALIFORNIA

Seacoast Commerce Bank

CRA Assessment Area

MSA 41740



LOS ANGELES COUNTY, CALIFORNIA

LOS ANGELES COUNTY, CALIFORNIA

M. Proof of Publication – San Diego Union Tribune



P.O. Box 120191, San Diego, CA 92112-0191

AFFIDAVIT OF PUBLICATION

SEACOAST COMMERCE BANK
11939 RANCHO BERNARDO DR., STE. 200
ATTN: CHEREE PETERSON
SAN DIEGO, CA 92128

**Community
Reinvestment Act
Strategic Plan Public
Comments Invited**

STATE OF CALIFORNIA} ss.
County of San Diego}

Seacoast Commerce Bank intends to file a Community Reinvestment Act Strategic Plan with the FDIC Regional Director, San Francisco, California, not sooner than thirty (30) days from the date of this notice. The proposed plan is available for public inspection from 9 am to 5 pm Monday through Friday at 11939 Rancho Bernardo Road, Suite 200, San Diego, CA 92128. The proposed plan is also available for viewing at <http://sccombank.com/customerservice/communityreinvestmentact>. Upon verbal request the Bank will mail a copy of the proposed plan to any interested party. These requests should be directed to Rick Sanborn, President at (858) 432-7001. Written comments on the plan should be addressed to Seacoast Commerce Bank Attn.: Rick Sanborn 11939 Rancho Bernardo Road, Suite 200 San Diego, CA 92128, or by email to rsanborn@sccombank.com. All written comments will be considered in developing the final Community Reinvestment Act Strategic Plan. All written comments will also be submitted along with the plan to the FDIC Regional Director and become a permanent addition to the plan.

The Undersigned, declares under penalty of perjury under the laws of the State of California: That he is a resident of the County of San Diego. That he is and at all times herein mentioned was a citizen of the United States, over the age of twenty-one years, and that he is not a party to, nor interested in the above entitled matter; that he is Chief Clerk for the publisher of

The San Diego Union-Tribune

a newspaper of general circulation, printed and published daily in the City of San Diego, County of San Diego, and which newspaper is published for the dissemination of local news and intelligence of a general character, and which newspaper at all the times herein mentioned had and still has a bona fide subscription list of paying subscribers, and which newspaper has been established, printed and published at regular intervals in the said City of San Diego, County of San Diego, for a period exceeding one year next preceding the date of publication of the notice hereinafter referred to, and which newspaper is not devoted to nor published for the interests, entertainment or instruction of a particular class, profession, trade, calling, race, or denomination, or any number of same; that the notice of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

Jun 28, 2013


Chief Clerk for the Publisher

6/28/13

Date

Affidavit of Publication of

Legal Advertisement
Ad# 0010756773#
ORDERED BY: CHEREE

M. **Proof of Publication – Los Angeles Times**

RECORDING/FILING REQUESTED BY AND MAIL TO:
Seacoast Commerce Bank/ Doug Thompson
11939 Rancho Bernardo Rd
San Diego, CA 92128

PROOF OF PUBLICATION
(California Code of Civil Procedure 2010, 2015.5)

STATE OF CALIFORNIA
County of Los Angeles

I am a citizen of the United States and a resident of the aforesaid County. I am over the age of eighteen years (18) years, and not a party to or interested in the above-entitled matter. I am the Principal Clerk of the printer of the **LOS ANGELES TIMES**, a newspaper of general circulation, printed and published DAILY in the City of Los Angeles, County of Los Angeles and which newspaper was adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of April 28, 1952, Case Number 598599. The notice, a true and correct copy of which is annexed, has been published in each regular and entire issue of said newspaper on the following dates, to wit:

SATURDAY; JANUARY 18, 2014

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated at Los Angeles, California,

This 6th day of February, 2014


Signature

Jessica Winn

Community Reinvestment Act Strategic Plan Public Comments Invited Seacoast Commerce Bank intends to file a Community Reinvestment Act Strategic Plan with the FDIC Regional Director, San Francisco, California, not sooner than thirty (30) days from the date of this notice. The proposed plan is available for public inspection from 9 am to 5 pm Monday through Friday at 11839 Rancho Bernardo Road, Suite 200, San Diego, CA 92128 or 505 N. Brand Blvd, Suite 110 Glendale, CA 91203. The proposed plan is also available for viewing at <https://secoastbank.com/customer-services/cra>. Upon verbal request the Bank will mail a copy of the proposed plan to any interested party. These requests should be directed to Rick Sanborn, President at (858) 432-7001. Written comments on the plan should be addressed to Seacoast Commerce Bank, Attn: Rick Sanborn 11839 Rancho Bernardo Road, Suite 200 San Diego, CA 92128, or by email to rsanborn@secoastbank.com. All written comments will be considered in developing the final Community Reinvestment Act Strategic Plan. All written comments will also be submitted along with the plan to the FDIC Regional Director and become a permanent addition to the plan.

N. Proof of Publication for Plan Revision– San Diego Union

**The San Diego
Union-Tribune**

PROOF OF PUBLICATION

STATE OF ILLINOIS
COUNTY OF Cook

The Undersigned, declares under penalty of perjury under the laws of the State of California: That he/she is and at all times herein mentioned was a citizen of the United States, over the age of twenty-one years, and that he/she is not a party to, nor interested in the above entitled matter; that he/she is Chief Clerk for the publisher of

Proof of Publication of

See Attached

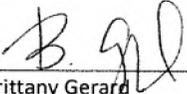
San Diego Union-Tribune

a newspaper of general circulation, printed and published daily in the City of San Diego, County of San Diego, and which newspaper is published for the dissemination of local news and intelligence of a general character, and which newspaper at all the times herein mentioned had and still has a bona fide subscription list of paying subscribers, and which newspaper has been established, printed and published at regular intervals in the said City of San Diego, County of San Diego, for a period exceeding one year next preceding the date of publication of the notice hereinafter referred to, and which newspaper is not devoted to nor published for the interests, entertainment or instruction of a particular class, profession, trade, calling, race, or denomination, or any number of same; that the notice of which the annexed is a printed copy, has been published in said newspaper in accordance with the instruction of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

April 1, 2016

I certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated in the City of Chicago, State of Illinois
on this 1st of April 2016.



Brittany Gerard
San Diego Union-Tribune
Legal Advertising

Order ID: 4084062

The San Diego Union-Tribune

Community Reinvestment Act Strategic Plan Public Comments Invited

Seacoast Commerce Bank intends to file an updated Community Reinvestment Act Strategic Plan with the Federal Reserve Bank Compliance and CRA Examinations, San Francisco, California, not sooner than thirty (30) days from the date of this notice. The updated plan is available for public inspection from 9 am to 5 pm Monday through Friday at 11939 Rancho Bernardo Road, Suite 200, San Diego, CA 92128. The updated plan is also available for viewing at <https://sccombank.com/customer-service/community-reinvestment-act>. Upon verbal request the Bank will mail a copy of the updated plan to any interested party. These requests should be directed to Rick Sanborn, President at (858) 432-7001. Written comments on the plan should be addressed to Seacoast Commerce Bank, Attn.: Rick Sanborn 11939 Rancho Bernardo Road, Suite 200 San Diego, CA 92128, or by email to rsanborn@sccombank.com. All written comments will be considered in developing the final Community Reinvestment Act Strategic Plan. All written comments will also be submitted along with the updated plan to the Federal Reserve Bank Compliance and CRA Examinations and become a permanent addition to the plan.

O. Website Notice

The screenshot shows the Seacoast Commerce Bank website. At the top left is the bank's logo. To the right is a search bar. Below the logo is a navigation menu with four items: General Banking, SBA Lending, Association Banking, and Customer Services. Underneath is a section for Online Account Access with a dropdown menu and a LOGIN button. To the right of this are three icons: a piggy bank for 'Open an Account', an envelope for 'Contact Us', and a map for 'Hours & Locations'. Below this is a breadcrumb trail: Home > Customer Services. The main heading is 'Community Reinvestment Act'. The content area contains the following text:

Community Reinvestment Act

Strategic Plan
Public Comments Invited

Seacoast Commerce Bank intends to file a Community Reinvestment Act Strategic Plan with FDIC Regional Director, San Francisco, California, during July 2013. We welcome written comments from the public on this plan and will consider all comments received in the development of the final plan. Written comments on the plan can be emailed to Rick Sanborn, President/CEO, at rsanborn@scombank.com, or mailed to the attention of Rick Sanborn at 11939 Rancho Bernardo Rd, Suite 200, San Diego, CA 92128. All written comments will be submitted with the plan to the FDIC Regional Director and become a permanent addition to the plan.

[Click here to view our CRA Strategic Plan - Draft](#)

At the bottom of the page, there is a footer with several links: Home, Contact Us, Rates, Careers, Terms of Use, Policies & Notices, Investor Relations, Press Releases, and Annual Reports. On the right side of the footer, there is a section titled 'Important Information Regarding Deposit Insurance Coverage' with logos for Equal Housing Lender, Member FDIC, and SBA Preferred Lender.

The screenshot displays the Seacoast Commerce Bank website. At the top left is the bank's logo. To the right is a search bar and the Seacoast Commerce Banc Holdings logo with a "Click here to access" link. Below this is a navigation menu with four items: "General Banking", "SBA Lending", "Specialty Banking", and "Customer Services".

The main content area is titled "Online Account Access" and features a dropdown menu labeled "I want to access..." and a "LOGIN" button. To the right are four icons: "Open an Account" (piggy bank), "Secure Email Portal" (envelope with lock), "Contact Us" (envelope), and "Hours & Locations" (map). Below these icons is a "Lost ATM/Debit Card Contact" section with the phone number "1-800-264-5578" and the text "24 Hours a Day / 7 Days a Week".

Below the account access section is a "Policies & Notices" section. It includes links for "Privacy Policy" (with a "Click here to view" link), "Foreclosure Relief Notice" (with a "Click here to view" link), and "CRA Strategic Plan". Under "CRA Strategic Plan", there are sub-links for "Community Reinvestment Act", "Strategic Plan", and "Public Comments Invited". A paragraph of text follows, stating: "Seacoast Commerce Bank intends to amend their Community Reinvestment Act Strategic Plan with the Federal Reserve Board. We welcome written comments from the public on this plan and will consider all comments received in the development of the final plan. Written comments on the plan can be emailed to Rick Sanborn, President/CEO, at rsanborn@sccombank.com, or mailed to the attention of Rick Sanborn at 11939 Rancho Bernardo Rd., Suite 200, San Diego, CA 92128. All written comments will be submitted with the plan to the Federal Reserve Board and become a permanent addition to the plan." Below this paragraph is a link: "Click here to view our CRA Strategic Plan SCB - Amend Mar. 2016".

At the bottom of the page, there is a footer with several columns of links: "Home", "Contact Us", "Rates"; "Careers", "Terms of Use", "Policies & Notices"; "Investor Relations", "Press Releases", "Annual Reports"; and "Important Information Regarding Deposit Insurance Coverage". To the right of these links are four logos: "EQUAL HOUSING LENDER", "Member FDIC", "SBA Preferred Lender", and "CEA FEDERATION PARTICIPATING MEMBER".