PUBLIC DISCLOSURE

July 8, 1996

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

SunTrust Bank, North Central Florida

Ocala, Florida

Federal Reserve Bank of Atlanta
104 Marietta Street, N.W.
Atlanta, Georgia 30303

NOTE: This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

GENERAL INFORMATION

This document is an evaluation of the Community Reinvestment Act (CRA) performance of SunTrust Bank, North Central Florida, Ocala, Florida, by the Federal Reserve Bank of Atlanta, the institution's supervisory agency.

This evaluation represents the agency's current assessment and rating of the institution's CRA performance based on an examination conducted as of July 8, 1996. It does not reflect any CRA-related activities that may have been initiated or discontinued by the institution after the completion of the examination.

The purpose of the Community Reinvestment Act of 1977, (12 U.S.C. 2901), as amended, is to encourage each financial institution to help meet the credit needs of the communities in which it operates. The Act requires that in connection with its examination of a financial institution, each federal financial supervisory agency shall (1) assess the institution's record of helping to meet the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operations of the institution, and (2) take the record of performance into account when deciding whether to approve an application of the institution for a deposit facility.

The Financial Institutions Reform, Recovery and Enforcement Act of 1989, Pub. L. No. 101-73, amended the CRA to require the agencies to make public certain portions of their CRA performance assessments of financial institutions.

Basis for the Rating

The assessment of the institution's record takes into account its financial capacity and size, legal impediments and local economic conditions and demographics, including the competitive environment in which it operates. Assessing the CRA performance is a process that does not rely on absolute standards. Institutions are not required to adopt specific activities, nor to offer specific types or amounts of credit. Each institution has considerable flexibility in determining how it can best help to meet the credit needs of its entire community. In that light, evaluations are based on a review of 12 assessment factors, which are grouped together under 5 performance categories, as detailed in the following section of this evaluation.

ASSIGNMENT OF RATING

Identification of Ratings

In connection with the assessment of each insured depository institution's CRA performance, a rating is assigned from the following groups:

Outstanding record of meeting community credit needs.

An institution in this group has an outstanding record of, and is a leader in, ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Satisfactory record of meeting community credit needs.

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

Needs to improve record of meeting community credit needs.

An institution in this group needs to improve its overall record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Substantial noncompliance in meeting community credit needs.

An institution in this group has a substantially deficient record of ascertaining and helping to meet the credit needs of its entire delineated community, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

Institution's Rating:

This institution is rated Outstanding, based on the findings presented in the following discussion of the institution's performance.

DISCUSSION OF INSTITUTION'S PERFORMANCE

I. ASCERTAINMENT OF COMMUNITY CREDIT NEEDS

Activities conducted by the institution to ascertain the credit needs of its community, including the extent of the institution's efforts to communicate with members of its community regarding the credit services being provided by the institution.

SunTrust Bank, North Central Florida's management remains committed to ascertaining the credit needs of the bank's community and informing all segments of the community about credit services offered by the bank. The board of directors, senior management, and other bank personnel have developed meaningful contacts with local government officials, individuals and groups representing civic, religious, economic development, and housing organizations. Management also has ongoing contact with the Ocala/Marion County Chamber of Commerce, the Gainesville/Alachua County Chamber of Commerce, Marion County Low Income Housing Coalition, the Downtown Redevelopment Agency of Gainesville, Greater Ocala Community Development Corporation (GOCDC), Alachua County/City of Gainesville State Housing Initiative Partnership (SHIP) Advisory Group, and the United Gainesville Community Development Corporation. Directors and officers of the bank hold leadership positions in some of these organizations.

Community outreach initiatives are formulated and carried out through the bank's CRA management process. Special outreach to low- and moderate-income areas and individuals include business development calls on small businesses, real estate professionals, and other key residents in traditionally under served areas of Ocala and Gainesville. The bank also conducts outreach in Spanish through its "Newcomer" program. Marketing- oriented outreach is discussed further in the marketing section of this evaluation.

The extent of participation by the institution's board of directors in formulating the institution's policies and reviewing its performance with respect to the purposes of the Community Reinvestment Act (CRA).

The board of directors has delegated oversight of the bank's CRA activities to a 17 member CRA management committee that meets quarterly. The CRA management committee is staffed by the chairman and chief executive officer, five additional directors, and 10 officers, including the CRA officer. The officers represent lending, marketing, retail service delivery, and legal functions of the bank. The CRA officer is the bank's senior lender and coordinator of the committee's activities. The examination review of CRA management committee minutes revealed that leading agenda topics include findings from ascertainment efforts, technical compliance with the regulation, marketing strategies, product development, and monitoring performance. These minutes show that the committee is authorized to act on marketing issues, credit policy, community development projects, and CRA-related operational and administrative matters, which constitutes active and direct policy oversight of CRA matters. Minutes of the CRA management committee are submitted and discussed at regular board of directors' meetings. The committee is also responsible for completing the bank's self-assessment, which includes the bank's geoanalysis.

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

I. ASCERTAINMENT OF COMMUNITY CREDIT NEEDS (CONTINUED)

The board of directors has adopted the SunTrust CRA Program from the bank's holding company, SunTrust Banks, Inc., Atlanta, Georgia. The program provides a recommended administrative structure for managing CRA activities. The board has expanded the CRA Statement to summarize the bank's policies, programs, and performance. Special lending programs, credit-related marketing efforts, specific community development projects, and other activities involving the bank with its community are listed in this document. At the time of this examination, the CRA Statement in effect had been adopted October 10, 1995. The board helps ensure technical compliance with CRA by reviewing the CRA Statement at least annually and by approving any material changes.

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED

The extent of the institution's marketing and special credit-related programs to make members of the community aware of the credit services offered by the institution.

SunTrust Bank, North Central Florida has developed sound marketing and advertising programs that are reviewed, approved, and monitored by senior management. Advertising in mass media reaches all segments of the bank's delineated community. The most frequently used media are radio and newspaper. Some promotional campaigns have been placed on television, other printed media, and outdoor advertising. Generally, mass media advertising purchases are coordinated by the holding company in Atlanta. Resources for locally targeted marketing are budgeted for special promotions and outreach activities.

The following media have been used for advertising the bank's products and services:

RADIO		TELEVISION	NEWSPAPER
WRUF-AM/FM	WMOP-FM,	WCJB -TV	Ocala Star Banner
WOCA- AM	WMFQ-FM	WOGX -TV	Gainesville Sun
	WMMZ-FM		

The "Short Cut Mortgage" program was the most frequently featured credit-related, mass media advertisement. The messages emphasized the benefits of convenience and applicant support during the application process. The radio script encouraged inquiries and stated that the bank's loan officers were prepared to be helpful in the application process.

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED (CONTINUED)

The bank's marketing budget allows for business development and advertising in less widely distributed media, including local community newspapers, trade magazines, and local directories for real estate, businesses, and farms. "Image" or "goodwill" advertisements were noted in the following publications:

- Riverland News
- Visitor's Guide
- Mahogany Review
- Homes and Land
- Florida Cattleman's Magazine
- Who's Who Directory
- Real Estate Book
- Shores Bulletin
- Florida Thoroughbred Farm Directory
- Voice of South Marion
- Marion County Farm Bureau Directory

The most notable aspect of the bank's marketing program is the formal officer call program, which focuses on business development. The call program includes efforts to market to minority-owned businesses and small farm owners. The number of calls placed annually by bank officers is a factor in their performance evaluation. Business development calls are particularly important for promoting special credit programs with flexible standards and features. Because specific qualification criteria for some of the special credit programs promoted are necessary, media advertising is less effective for this segment of the community.

Each call is tracked by a computer program that generates a monthly report of all calls made. The calls are further documented using an officer call report form submitted to the CRA Officer who compiles and summarizes the information for the CRA management committee. Finally, the officer in charge of identifying and reaching new residents and businesses relocating to the community for the bank's "Newcomers Program" is bilingual. Through this officer, the bank can reach Spanish speaking segments of the community with information about its products and services.

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED (CONTINUED)

The institution's origination of residential mortgage loans, housing rehabilitation loans, home improvement loans, and small business or small farm loans within its community, or the purchase of such loans originated in its community.

The bank has affirmatively addressed identified credit needs by originating residential mortgage loans, housing rehabilitation loans, home improvement loans, and small business and farm loans within its community. The types of credit products offered by the bank, as listed on the bank's CRA Statement, include:

Loans to Consumers:

Personal Loans
Personal Property Loans (automobiles, etc.)
Home Improvement Loans
Home Equity Loans
Personal Lines of Credit
Home Equity Lines of Credit
Credit Cards
Second Mortgage Loans

Loans to Businesses:

Small Business Loans
Small Business Administration (SBA) Loans
Lines of Credit
Loans for Working Capital, Inventory and Receivables
Loans for Nonprofit Institutions including churches/synagogues
Loans for Agricultural Purposes
Letters of Credit

Real Estate Financing:

1-4 Family (owner-occupied) Residential Property
Farmers Home Administration (FmHA) Loans
Multifamily Apartments
Commercial and Industrial Property
Acquisition and Development Loans
Special Purpose Construction (for churches and community facilities)

Loans to Government Entities:

Industrial Revenue Bonds
State Municipal Bonds
Federal Government and Agency Notes and Bonds
Short-term Loans

Special Programs:

SBA Loans
SunCares Program
Special first mortgage loans in local public/private development programs, including SHIP and United Gainesville Community Development Corporation (UGCDC) loans

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED (CONTINUED)

Reports of application and loan activity, discussions with management, and the review of recent loan originations for compliance with the consumer and civil rights laws and regulations determined that the bank originated all of the types of loans listed in the CRA Statement.

The bank offers a variety of credit products to meet the community's credit needs as listed on the bank's CRA Statement. The bank also offers mortgage loans with more flexible underwriting guidelines such as the SunCares Program. The SunCares Program allows down payment and closing costs assistance from SHIP subsidy funds. Private mortgage insurance (PMI) can be waived, and nontraditional sources of credit are accepted. Higher housing expense and total debt-to-income ratios are other flexible features of the SunCares Program. The bank has originated 18 SunCares loans for a total of $750,450 since the previous examination. The bank is also an active originator of mobile home loans, which has proven to be an affordable housing option in this community for low- and moderate-income families and retirees. Since the previous examination, the bank has originated 136 mobile home loans for a total of $2.7 million.

The review of the loan portfolio revealed that the bank offers and extends the types of credit listed in its CRA Statement. The March 31, 1996 Consolidated Reports of Condition and Income revealed a loan portfolio that consisted of the following:

LOAN TYPE	PERCENTAGE
Construction and development	2.4%
Secured by one- to four-family dwellings	45.7%
Other real estate:	
Farmland	4.1%
Multifamily	1.1%
Nonfarm nonresidential	17.6%
Agricultural and production	2.9%
Commercial and industrial	7.2%
Loans to individuals	14.8%
All other	4.2%
Total	100.0%

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED (CONTINUED)

The table illustrates that the bank's outstanding loans are significantly concentrated in residential loans. The bank primarily originates variable-rate mortgage loans and retains them in its loan portfolio; however, the bank has been originating higher volumes of commercial loans, consistent with management's recognition of the need for small business credit. According to the March 31, 1996 Consolidated Reports of Condition and Income, the bank's asset size was $794 million with a loan-to-deposit ratio of 81 percent. The bank's loan-to-deposit ratio is consistent with that of its major competitors.

The following tables summarize the bank's market share of applications and originations reportable under the Home Mortgage Disclosure Act (HMDA) for 1994 and 1995. Origination rates for both the bank and the market are included in the second table. The market is defined as portions of Marion and Alachua Counties.

APPLICATIONS

LOAN TYPE	BANK		MARKET		BANK'S MARKET SHARE (%)	
	1994	1995	1994	1995	1994	1995
Home Purchase (Includes FHA/VA)*	736	513	7,705	9,743	9.5	5.3
Refinance	422	227	3,867	3,018	11.0	7.5
Home Improvement	124	213	1,632	2,007	7.6	10.6
Multifamily	0	0	38	22	0	0
Total	1282	953	13,242	14,790	9.7	6.4

*Home Purchase includes FHA/VA for the market. The bank had no applications in these programs.

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED (CONTINUED)

ORIGINATIONS

LOAN TYPE	BANK				MARKET				BANK'S MARKET SHARE (%)	
	1994		1995		1994		1995			
	#	Orig. Rate	#	Orig. Rate	#	Orig. Rate	#	Orig. Rate	1994	1995
Home Purchase (Includes FHA/VA)*	577	78.4%	393	76.6%	5,143	66.7%	5,961	61.2%	11.2	6.6
Refinance	273	64.7%	153	67.4%	2,366	61.2%	1,652	54.7%	11.5	9.3
Home Improvement	72	58.1%	133	62.4%	972	59.6%	1,152	57.4%	7.4	11.6
Multifamily	0	N/A	0	N/A	26	68.4%	19	86.4%	0	0
Total	922	71.9%	679	71.2%	8,507	64.2%	8,784	59.4%	10.8	7.7

*Home Purchase includes FHA/VA for the market. The bank had no applications in these programs.

The tables show SunTrust Bank, North Central Florida losing volume and market share from 1994 to 1995 in applications and originations of first mortgages, while gaining market share for home improvement loans. According to 1994 HMDA aggregate statistics, the bank was the second largest producer of applications in its market. From 1994 to 1995, the bank's three largest depository institution competitors also suffered significant declines in volume and market share. Total applications in the market showed a net gain of 1,548 from 1994 to 1995. SunTrust Bank, North Central Florida's rank dropped from second to third in the market for applications received. In terms of originating loans from applications received, however, the bank was more productive than its competitors. The bank originated a greater percentage of applications than the market in all categories of HMDA reportable lending, excluding multifamily, for 1995. In 1994, the bank originated a slightly lower percentage of home improvement applications than the market. The most significant difference in origination rates was noted for home purchase applications for both years. The bank is considered a leading mortgage lender in its market.

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED (CONTINUED)

The table below shows the number, dollar volume, and size of business purpose loans originated between July 1, 1994, and January 1, 1996.

Original Loan Amount	Number	Dollar Volume (000s)
$100,000 or less	1,342	$36,678
$100,000 - $250,000	186	$29,762
$250,000 - $1 million	83	$33,275
Over $1 million	9	$22,727

The bank originates a significant volume of business loans, and a substantial proportion of these loans were for relatively small amounts. Loan amount was used to approximate the size of businesses because revenue data was not available. The most significant proportion of the bank's loan originations was for amounts of $100,000 or less.

The institution's participation in governmentally insured, guaranteed, or subsidized loan programs for housing, small businesses, or small farms.

The bank offers loans guaranteed by the SBA and FmHA. The bank also originates mortgage loans subsidized through the Marion and Alachua County SHIP program and the Federal National Mortgage Association (FNMA) 3/2 conventional mortgage program that can be used in conjunction with government subsidies such as SHIP for down payment or closing cost assistance.

The table below shows the number and dollar amount of the bank's government-insured and guaranteed loans originated since the previous examination.

	ORIGINATIONS	
PROGRAM	Number	Amount
Small Business Administration (SBA)	6	$1,251,311
Farmers Home Administration (FmHA)	3	$486,372
SHIP Loans (Alachua and Marion County combined)	20	$871,525

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

II. MARKETING AND TYPES OF CREDIT OFFERED AND EXTENDED (CONTINUED)

To assist small businesses in the community, SunTrust Bank, North Central Florida has been approved as a lender under the SBA's Low-Doc program. The low-doc program is one of SBA's newest programs and focuses on loans up to a maximum of $100,000. It is a guarantee program for which the SBA has notably lessened the application documentation requirements, thus reducing the paper burden for both the applicant and financial institutions. The bank has also sponsored small business seminars and is active in the City of Gainesville's SBA 504 program as well as the Small Business Committee of the Ocala/Marion County Chamber of Commerce. SunTrust Bank, North Central Florida is also an approved lender under the SBA's Green Line Program. This is a two-year pilot program working in conjunction with approved lenders to provide revolving lines of credit to small businesses to help meet their short-term financing needs.

III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES

Reasonableness of Delineated Community

The bank's delineated community meets the purpose of CRA and does not arbitrarily exclude any low- to moderate-income neighborhoods. The bank's delineated community consists of parts of Marion and Alachua Counties. The delineation for Marion County consists of those portions of the county west of the Ochlawaha River. The bank has defined the city of Gainesville and its immediate surrounding areas as part of its delineated community. There are 70 census tracts in the delineated community, one of which has zero population and no housing units. SunTrust, North Central Florida has 14 offices. Ten are located in Marion County and four are located in Alachua County.

The geographic distribution of the institution's credit extensions, credit applications, and credit denials.

SunTrust Bank, North Central Florida geocodes every loan application, approved, denied, or withdrawn, that is accepted at each of the 14 offices. The bank performs a geocoding analysis that determines market penetration for all applications received and loans approved, commercial lending activity within low- to moderate-income tracts, prevalent denial reasons in the low- to moderate-income census tracts, and a review of specific low- to moderate-income census tracts with application penetration below 5.01 percent and an approval ratio below 63 percent. The most recent geocoding analysis performed was for 1993 and 1994. The data collected for 1994 and 1995 will be analyzed as part of management's ongoing commitment to determine the geographic distribution of the bank's credit extensions, applications and denials for consumer direct and indirect installment loans, HMDA reportable loans, and small business loans.

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES (CONTINUED)

The origination of consumer direct and installment loans, HMDA reportable loans, and small business loans inside versus outside the bank's delineated community is as follows.

	NUMBER INSIDE	NUMBER OUTSIDE	PERCENTAGE INSIDE
1994	4,970	866	85.2%
1995	4,629	984	82.5%

The table shows that the bank originates a substantial majority of its loans within the delineated community.

The review of the bank's lending activities by census tract income and applicant income is summarized in the following tables.

1994 DISTRIBUTION BY CENSUS TRACT INCOME

CENSUS TRACT TYPE	APPLICATIONS	% OF TOTAL APPLICATIONS	ORIGINATIONS	% OF TOTAL ORIGINATIONS
LOW/MODERATE-INCOME	1,109	12.7	529	10.6
MIDDLE-INCOME	5,879	67.6	3,307	66.5
UPPER-INCOME	1,701	19.6	1,130	22.8
UNKNOWN[1]	7	.1	4	.1
TOTAL	8,696	100.0	4,970	100.0

1995 DISTRIBUTION BY CENSUS TRACT INCOME

CENSUS TRACT TYPE	APPLICATIONS	% OF TOTAL APPLICATIONS	ORIGINATIONS	% OF TOTAL ORIGINATIONS
LOW/MODERATE-INCOME	967	11.9	467	10.1
MIDDLE-INCOME	5,606	68.7	3,080	66.5
UPPER-INCOME	1,584	19.4	1,083	23.4
TOTAL	8,157	100.0	4,630	100.0

There are 69 populated census tracts within the bank's delineated community. The percentages of the bank's applications and originations based on census tract income meet or exceed the percentage of the population living in the tracts in all types of census tracts except low- and moderate-income. 23.2 percent of the population of the

[1] Seven applications were not geocoded in 1994 (6 consumer and 1 small business). Four of the applications were originated.

III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES (CONTINUED)

bank's delineated community lives in low- and moderate-income census tracts. On average in 1994 and 1995, 12.3 percent of the bank's applications were from low- and moderate-income census tracts, and 10.4 percent of the originations were in these tracts. 56.5 percent of the population lives in middle-income tracts, and 20.3 percent lives in upper-income tracts.

1994 DISTRIBUTION BY APPLICANT INCOME

APPLICANT INCOME TYPE	APPLICATIONS	% OF TOTAL APPLICATIONS	ORIGINATIONS	% OF TOTAL ORIGINATIONS
LOW/MODERATE	2,708	36.5	975	25.5
MIDDLE	1,574	21.2	789	20.6
UPPER	2,511	33.8	1,673	43.7
INCOME NOT AVAILABLE	634	8.5	388	10.2
TOTAL*	7,427	100.0	3,825	100.0

*Total excludes commercial loan activity.

1995 DISTRIBUTION BY APPLICANT INCOME

APPLICANT INCOME TYPE	APPLICATIONS	% OF TOTAL APPLICATIONS	ORIGINATIONS	% OF TOTAL ORIGINATIONS
LOW/MODERATE	2,606	37.3	916	25.7
MIDDLE	1,658	23.7	847	23.7
UPPER	2,696	38.5	1,781	49.9
INCOME NOT AVAILABLE	36	.5	24	.7
TOTAL*	6,996	100.0	3,568	100.0

*Total excludes commercial loan activity.

According to the 1990 census, low- and moderate-income families represented 38.0 percent of the market, middle-income families represented 21.7 percent of the market, and upper-income families represented 40.3 percent of the market.

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES (CONTINUED)

The tables illustrate that the bank's distribution of originations by applicant income was in proportion to the demographic make-up of the delineated community for all income types except low- and moderate-income. The percentage of applications from low- and moderate-income applicants either met or exceeded the percentage of low- and moderate-income population; however, the percentage of the number of loans originated by the bank is lower.

The tables below summarize the bank's HMDA lending is units and dollars originated, by census tract and borrower income characteristics for 1994 and 1995 combined.

TABLE A

INCOME LEVELS OF CENSUS TRACTS	CONVENTIONAL HOME PURCHASE		REFINANCE		HOME IMPROVEMENT	
	#	$(000s)	#	$(000s)	#	$(000s)
LOW/MODERATE	48	2,617	27	981	20	182
MIDDLE	615	43,967	297	12,851	146	1,463
UPPER	307	39,832	102	9,196	39	595
TOTAL	970	86,416	426	23,028	205	2,240

TABLE B

INCOME LEVELS OF BORROWERS	CONVENTIONAL HOME PURCHASE		REFINANCE		HOME IMPROVEMENT	
	#	$(000s)	#	$(000s)	#	$(000s)
LOW/MODERATE	248	11,495	143	4,062	88	337
MIDDLE	118	6,362	58	2,380	16	158
UPPER	602	67,086	222	16,372	100	1,393
TOTAL	968	84,943	423	22,814	204	1,888

Table A shows that the substantial majority of all types of HMDA lending is concentrated in upper-income census tracts. The bank's active origination of special mortgage loans tailored to the needs of low- and moderate-income families such as SunCares and SHIP subsidized transactions has not resulted in improved penetration of these geographies and presents special challenges to management. However, Table B

III. GEOGRAPHIC DISTRIBUTION AND RECORD OF OPENING AND CLOSING OFFICES (CONTINUED)

illustrates that SunTrust Bank, North Central Florida lends to all income groups within its delineated community when applicant characteristics are considered. Increasing the bank's penetration of low- and moderate-income census tracts has remained on the agenda of the CRA management committee since the previous examination and is management's primary concern in relation to CRA performance.

The institution's record of opening and closing offices and providing services at offices.

SunTrust Bank, North Central Florida has 14 offices in Marion and Alachua Counties. The October 1994 merger of Sun Bank of Ocala with 10 branches and Sun Bank of Gainesville with 4 branches resulted in SunTrust Bank, North Central Florida. The main office is located at 203 East Silver Springs Boulevard, Ocala, Florida. The locations of the bank's facilities are considered accessible to all segments of the community, including low- and moderate-income areas.

The bank's Golden Hills office was moved to a newly constructed branch in December 1995. The purpose for relocating the branch facility was to enable SunTrust Bank, North Central Florida to enlarge the size of the branch to better serve the residents of this market.

SunTrust Bank, North Central Florida follows the guidelines established by SunTrust Banks, Inc., for closing branches. The branch closing procedures are in compliance with section 42 of the Federal Deposit Insurance Act. The procedures provide ways to determine whether a branch should be closed, restoring the viability of locations considered for closing, and requiring customer and regulatory notifications. In considering ways to restore viability of a branch and explore other alternatives for closing, procedures require management to solicit ideas from community leaders and evaluate the community effect of the proposed action.

IV. DISCRIMINATION AND OTHER ILLEGAL CREDIT PRACTICES

Any practices intended to discourage applications for types of credit set forth in the institution's CRA Statement.

SunTrust Bank, North Central Florida solicits applications from all segments of its local community, including low- and moderate-income communities. The bank's policies and internal control procedures are adequate to ensure that the evaluation of credit applications is based solely on financial and economic considerations. The bank is in compliance with the substantive provisions of antidiscrimination laws and regulations. No practices in place have the intent or effect of discouraging applications.

DISCUSSION OF INSTITUTION'S PERFORMANCE (CONTINUED)

IV. DISCRIMINATION AND OTHER ILLEGAL CREDIT PRACTICES (CONTINUED)

Credit policies and procedures are reviewed periodically by management to ensure that they are not discriminatory toward any protected class. In addition, all of the bank's employees receive at least annual training on the requirements of Regulation B - Equal Opportunity Act and the other fair housing and fair lending regulations.

Evidence of prohibited discriminatory or other illegal credit practices.

No credit practices inconsistent with the substantive provisions for fair housing and fair lending laws and regulations were identified; however, limited violations of technical aspects of HMDA were noted.

V. COMMUNITY DEVELOPMENT

The institution's participation, including investments, in local community development and redevelopment projects or programs.

SunTrust Bank, North Central Florida continues to make investments in community development through direct investments and public/private partnerships. The bank continues to make direct loans unilaterally or on a participation basis for projects promoting economic development or for the creation, restoration, or improvement of affordable housing. The following activities have resulted in investments for these purposes.

Marion County Low-Income Housing Coalition

SunTrust Bank, North Central Florida is actively involved with this coalition. The bank's mortgage manager serves as president of the organization. The coalition is dedicated to providing opportunities for housing to the low- and moderate-income residents of Marion County. The coalition facilitates access to housing through information and referral services, dissemination of information, and public awareness of community needs.

On April 13, 1996, the coalition sponsored an affordable housing workshop. The bank had a loan officer available to meet with various individuals to discuss information on applications, credit reports, and to answer questions. The banking subcommittee of the Marion County agency was also instrumental in assisting the county with the development of their SHIP program. In conjunction with the coalition, the bank's mortgage manager served on the coalition's education committee whose purpose was to develop educational seminars to assist with the "kick-off" of the city's and county's SHIP programs. The bank's mortgage manager also assisted Marion County with its SHIP educational classes by serving as an instructor.

V. COMMUNITY DEVELOPMENT (CONTINUED)

Greater Ocala Certified Development Corporation (GOCDC)

The primary mission of the GOCDC is to stimulate small business growth by providing “micro-loans” to minority business owners and entrepreneurs. The GOCDC works in partnership with local financial institutions who assist with the funding of the loans. A consortium of five banks has made over $150,000 in loans to local minority and low- to moderate-income borrowers. The constitution receives a portion of its funding from the City of Ocala’s Economic Improvement Funds. SunTrust Bank, North Central Florida provided a $3,500 grant in 1995 to the program and committed to fund the same amount for 1996. The bank has also provided the GOCDC with furnishings for its office. The bank’s corporate lending manager serves as a director to the board of the agency. Subsequent to the $3,500 commitment, the bank has made two loans totaling $25,000.

United Gainesville Community Development Corporation (UGCDC)

The primary focus of the UGCDC agency is the development and redevelopment of small and minority-owned businesses as well as low-income and minority neighborhoods through public/private cooperative financing and a revolving loan fund. One of the bank’s community lenders is a director of the agency and also serves on the small business approval committee.

Neighborhood Housing Development Corporation (NHDC)

NHDC is a nonprofit organization publicly supported by partnerships with residents, business leaders, and local governments. NHDC is a proud local NeighborWorks organization. In Gainesville, the accomplishments include assisting more than 200 families with home improvement loans for repair services as well as building new affordable homes for low-income families in the Pleasant Street and Porter neighborhoods. To date, the bank has closed 2 loans totaling $82,150.

SunTrust Bank, North Central Florida also offers the Shalom Savings Program. The program was developed for the purpose of assisting individuals with establishing a pattern of savings and budgeting. The program offers a wide variety of services including budget and financial planning. Members are required to attend three seminars per year and are encouraged to attend the financial support group meetings when possible. SunTrust Bank, North Central Florida provides participants with a savings account that has a reduced minimum daily balance or monthly maintenance fee and free deposit slips. Since the implementation of this program in May 1995, 36 accounts have been opened.

V. COMMUNITY DEVELOPMENT (CONTINUED)

Other credit-related activities

The bank is a very active originator of church loans within its delineated community. During 1995, the bank made 26 loans totaling $3.9 million. In 1996, the bank has originated 20 church loans totaling $3.5 million.

The institution's ability to meet various community credit needs based on its financial condition and size, legal impediments, local economic conditions, and other factors.

SunTrust Bank, North Central Florida has the financial and human resources to play a leading role in community development and is actively involved to some extent in every community initiative considered by management to have a community development purpose. As a retail bank primarily engaged in residential and consumer lending, the bank's relationships with organizations sharing community development missions are necessary for effective community outreach and creating additional retail lending opportunities.

Community Profile

SunTrust Bank, North Central Florida serves a large and diverse geographic area which includes Marion County, Florida's fifth largest county that consists of 1,610 square miles. To serve the community of Gainesville, SunTrust Bank, North Central Florida has four offices located in the community of Gainesville. Gainesville is a university community of approximately 88,000 persons, located in a county of 902 square miles with a population of 180,000. As mentioned, the bank's delineated community has 70 census tracts, 1 of which has no population. The total population is 361,180 with a racial composition of 78.5 percent nonminority and 21.5 percent minority. Illustrated below are characteristics of each county in the bank's delineation.

V. COMMUNITY DEVELOPMENT (CONTINUED)

Community Profile (Continued)

MARION COUNTY	Tract Summary
Total number of tracts	42
Number of low-income tracts	2 (1 without population)
Number of moderate-income tracts	3
Number of middle-income tracts	30
Number of upper-income tracts	7
Population Summary	
1995 population[1]	179,784
1990 population	194,833
Percentage decrease	7.6%
Major communities in the county	Ocala
Income Summary	
Median family income	$26,089
Total number of families	57,770
Percentage of low-income families	17.9%
Percentage of moderate-income families	19.3%
Percentage of middle-income families	24.0%
Percentage of upper-income families	38.8%
Percentage of families below poverty level	10.8%

The 1992 U.S. Census employment data for county business patterns show that a total of 4,514 (96 percent) of small businesses in Marion County have fewer than 50 employees. The local economy in Marion County is predominately retail and service-oriented to meet the needs of growing numbers of permanent and seasonal residents and retirees.

[1]Source: University of Florida, Population Program Bureau of Economic and Business Research.

V. COMMUNITY DEVELOPMENT (CONTINUED)

Community Profile (Continued)

According to the 1990 Census data, 62.5 percent of the 94,567 housing units in Marion County were owner-occupied, and 20.2 percent were renter-occupied. 63.2 percent of the dwellings were one- to four-family dwellings, and 30 percent were mobile homes. The median housing age was 24 years. The median housing value was $61,752.

ALACHUA COUNTY	Tract Summary
Total number of tracts	28
Number of low-income tracts	4
Number of moderate-income tracts	8
Number of middle-income tracts	9
Number of upper-income tracts	7
Population Summary	
1995 Population [1]	181,596
1990 population	185,600
Percentage decrease	2.2%
Major communities in the county	Gainesville
Income Summary	
Median family income	$31,403
Total number of families	41,439
Percentage of low-income families	23.1%
Percentage of moderate-income families	16.7%
Percentage of middle-income families	19.0%
Percentage of upper-income families	41.2%
Percentage of families below poverty level	14.4%

The 1992 U.S. Census employment data for county business patterns show a total of 4,632 in Alachua County with a total of 4,434 (96 percent) of small businesses having fewer than 50 employees.

[1]Source: University of Florida, Population Program Bureau of Economic and Business Research.

V. COMMUNITY DEVELOPMENT (CONTINUED)

Community Profile (Continued)

According to the 1990 Census data, 48.9 percent of the 79,022 housing units in Alachua County were owner-occupied, and 41.3 percent were renter-occupied. 62.9 percent of the dwellings were one- to four-family dwellings, and 12.9 percent were mobile homes. The median housing age was 20 years. The median housing value was $65,507.

Bank Profile

SunTrust Bank, North Central Florida was formed in October 1994 from the merger of the Gainesville and Ocala predecessor institutions: Sun Bank of Ocala and Sun Bank of Gainesville. Sun Bank of Ocala changed its name to SunBank of North Central Florida and functioned as the lead bank during the transition. Sun Bank of North Central Florida is now called SunTrust Bank, North Central Florida and is a subsidiary of SunTrust Banks, Inc., Orlando, Florida, which is 100 percent owned by SunTrust Banks, Inc., Atlanta, Georgia.

Any other factors that, in the regulatory authority's judgment, reasonably bear upon the extent to which an institution is helping to meet the credit needs of its entire community.

No factors that would restrict the bank’s ability to serve local credit needs were noted.

DSBB No. 06-12-1112

TO THE INSTITUTION EXAMINED:

THIS COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION WAS PREPARED BY THE FEDERAL RESERVE BANK OF ATLANTA. THE FOLLOWING ACTIONS MUST BE TAKEN TO FULFILL THE CRA'S REQUIREMENTS.

- AT A MINIMUM, PLACE THE EVALUATION IN YOUR CRA PUBLIC FILE LOCATED AT YOUR HEAD OFFICE (AND A DESIGNATED OFFICE IN EACH OF YOUR LOCAL COMMUNITIES) NO LATER THAN 30 BUSINESS DAYS AFTER RECEIVING THE EVALUATION.

- PROVIDE A COPY OF THE EVALUATION TO THE PUBLIC UPON REQUEST (YOU ARE PERMITTED TO CHARGE A FEE NOT TO EXCEED THE COST OF REPRODUCTION AND MAILING IF APPLICABLE) NO LATER THAN 30 BUSINESS DAYS AFTER RECEIVING THIS LETTER.

FEDERAL RESERVE BANK OF ATLANTA

		ASSISTANT VICE PRESIDENT
(Date)	CYNTHIA C. GOODWIN	(Title)

. . . . . .

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

19

TO THE FEDERAL RESERVE BANK OF ATLANTA

A COPY OF THE COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION PREPARED AS OF THE CLOSE OF BUSINESS JULY 8, 1996, BY AN EXAMINER FOR THE FEDERAL RESERVE BANK OF ATLANTA HAS BEEN RECEIVED AND WILL BE MADE AVAILABLE TO THE PUBLIC IN THE MANNER STATED IN THE LETTER WHICH ACCOMPANIED THE EVALUATION.

(Signature of Authorized Officer)

(Title)

SUNTRUST BANK, NORTH CENTRAL FLORIDA

(Name of Bank)

OCALA, FLORIDA

(Location)

DSBB No. @

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FEDERAL RESERVE BANK OF ATLANTA

		VICE PRESIDENT
(Date)	RONALD N. ZIMMERMAN	(Title)

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- ADD THE FOLLOWING LANGUAGE TO YOUR CRA PUBLIC NOTICE THAT IS POSTED IN EACH OF YOUR OFFICES, NO LATER THAN 30 BUSINESS DAYS AFTER RECEIVING THE EVALUATION:

"YOU MAY OBTAIN THE PUBLIC SECTION OF OUR MOST RECENT CRA PERFORMANCE EVALUATION, WHICH WAS PREPARED BY THE FEDERAL RESERVE BANK OF ATLANTA, AT (YOUR MAIN OFFICE ADDRESS)."

FEDERAL RESERVE BANK OF ATLANTA

		ASSISTANT VICE PRESIDENT
(Date)	CYNTHIA C. GOODWIN	(Title)

. . . . . .

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FEDERAL RESERVE BANK OF ATLANTA

		VICE PRESIDENT
(Date)	RONALD N. ZIMMERMAN	(Title)

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

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(Signature of Authorized Officer)

(Title)

@

(Name of Bank)

@

(Location)

FEDERAL RESERVE BANK OF ATLANTA

Cynthia C. Goodwin
ASSISTANT VICE PRESIDENT

Board of Directors
SunTrust Bank, North Central Florida
Post Office Box 310
Ocala, Florida 32678

Dear Board Members:

Enclosed is the bank's Community Reinvestment Act Performance Evaluation prepared by Federal Reserve Examiner Jack Libbe using the guidelines established by the Federal Financial Institutions Examination Council. This evaluation was prepared in accordance with the Community Reinvestment Act (CRA), as amended by the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, and must be made available to the public. The following actions must be taken to fulfill the CRA's requirements.

- At a minimum, place the evaluation in your CRA public file located at your head office (and a designated office in each of your local communities) no later than 30 business days after receiving this letter.

- Provide a copy of the evaluation to the public upon request (you are permitted to charge a fee not to exceed the cost of reproduction and mailing if applicable) no later than 30 business days after receiving this letter.

Please acknowledge receipt of this evaluation by signing and returning the attached blue form. The format and content of the evaluation should not be altered or abridged in any manner. You may wish to comment on this information detailing actions the bank has taken since the examination to meet its obligations under the CRA. Any written comments concerning the evaluation placed in the public file should also be forwarded to this office. If you believe any of the information included in the public evaluation is proprietary, please contact this Reserve Bank so that the appropriate action can be taken.

Our Community Affairs staff is available to assist you in determining and responding to community credit needs. Please feel free to contact Mr. Courtney Dufries at (404) 589-7226. If you have any questions concerning this report or any other compliance matter, contact Ms. Gale Williams at (404) 589-7223.

Very truly yours,

Cynthia C. Goodwin

Enclosures

PUBLIC DISCLOSURE

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Name of Bank: SUNTRUST BANK, NORTH CENTRAL FLORIDA

City and State: OCALA, FLORIDA

Date of Examination: JULY 8, 1996

FEDERAL RESERVE BANK OF ATLANTA