



**PUBLIC DISCLOSURE**

July 9, 2018

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

City National Bank of Florida  
Charter Number 15977

25 West Flagler Street  
Miami, FL 33130

Office of the Comptroller of the Currency

9850 NW 41st Street  
Suite 260  
Miami, FL 33178

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low-and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

## Table of Contents

<b>OVERALL CRA RATING .....</b>	<b>2</b>
<b>DEFINITIONS AND COMMON ABBREVIATIONS .....</b>	<b>3</b>
<b>DESCRIPTION OF INSTITUTION .....</b>	<b>7</b>
<b>SCOPE OF THE EVALUATION.....</b>	<b>8</b>
<b>DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....</b>	<b>10</b>
<b>CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....</b>	<b>11</b>
LENDING TEST .....	11
INVESTMENT TEST.....	17
SERVICE TEST .....	18
<b>APPENDIX A: SCOPE OF EXAMINATION.....</b>	<b>A-1</b>
<b>APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS.....</b>	<b>B-1</b>
<b>APPENDIX C: TABLES OF PERFORMANCE DATA .....</b>	<b>C-1</b>

## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated **Outstanding**.

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

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

\* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- An excellent level of community development (CD) lending that is responsive to CD credit needs and is a significant positive impact on the overall Lending Test rating.
- Lending activity that reflects good responsiveness to the credit needs of the Bank’s assessment area (AA), given performance context.
- Good geographic distribution of loans with a substantial majority of loans within the Bank’s AA.
- Good distribution of loans among borrowers of different income levels and businesses of different sizes, as well as the extensive use of innovative lending practices in order to serve AA credit needs.
- A good level of qualified investments responsive to AA needs.
- Retail service delivery systems that are accessible to essentially all portions of the AA and an excellent level of community development services.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the Bank and is, therefore, an affiliate.

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

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the Bank's assessment area(s) or outside the assessment area(s) provided the Bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the Bank, and to take this record into account when evaluating certain corporate applications filed by the Bank.

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is

further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5

million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

**Multifamily:** Refers to a residential structure that contains five or more units.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

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

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

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

**Tier One Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Description of Institution

City National Bank of Florida (CNB) is an intrastate commercial bank headquartered in Miami, Florida. The Bank is wholly owned by Banco de Credito e Inversiones (Bci), a Chilean Bank. The U.S. bank holding company, Bci Financial Group Incorporated, has total assets of \$10.1 billion as of December 31, 2017. CNB has no operating subsidiaries.

As of December 31, 2017, CNB had total assets of \$10.1 billion. Deposits totaled \$7.8 billion; and the total loan portfolio (net of unearned income), which represents 69.7 percent of total assets, was \$7.1 billion. The loan to deposit ratio was 90.7 percent. Components of the Bank's loan portfolio include commercial real estate loans (49.5 percent), residential real estate loans (18.4 percent), commercial and industrial loans (26.4 percent), and consumer loans (5.8 percent). Tier one capital totaled \$988.6 million.

The Bank strategically focuses on commercial real estate lending, corporate cash management, and private banking. Two other lines of business are personal and business banking and corporate banking, providing existing clients with comprehensive banking services. CNB originates small loans to businesses and uses its real estate lending expertise to originate community development loans. The Bank has a residential mortgage loan department that specializes in loans to low-and moderate-income (LMI) borrowers. In addition to loan originations, CNB purchased home mortgage loans during the evaluation period to support lending goals for LMI borrowers.

CNB offers a full range of financial products and services through a 26-branch network in Miami-Dade (16), Broward (5), and Palm Beach (3) Counties as well as in Orange County (2). Miami-Dade County represents the Bank's core business.

There are no legal or financial factors impeding the Bank's ability to help meet the credit needs of its assessment area. During the evaluation period, the Bank faced various competitive and economic challenges as discussed throughout the Performance Evaluation. These factors were considered when determining the CRA performance. The Bank's rating at the last CRA examination, dated May 4, 2015, was "Outstanding."



## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This Performance Evaluation assesses the Bank's performance under the Lending, Investment, and Service Tests. In evaluating the Bank's lending performance, we reviewed home mortgage loans subject to reporting under HMDA (home purchase, home improvement, and home refinance loans), small loans to businesses subject to reporting under the CRA, and community development loans. We also evaluated community development investments and community development services.

The Bank did not report any small loans to farms during the evaluation period. Therefore, tables for this product are not included in the Core Tables of this Report in Appendix C.

The evaluation period for all products is January 1, 2015 through December 31, 2017. For the Lending Test, separate analyses were conducted with the years of 2015 and 2016 combined. The year 2017 was analyzed separately due to the 2015 American Community Survey (ACS) US Census that applies to 2017. The 2010 US Census applies to the years 2015 and 2016. Comparative data was different for each year due to the Census change and the change of the income level of some CTs also referred to as geographies.

### Data Integrity

This evaluation is based on accurate data. In February 2018, we completed a data integrity examination that included sampling records from the HMDA Loan Application Register and sampling business loans from the CRA Data Collection for 2015, 2016, and 2017. The HMDA data sampled had no errors and the CRA data had isolated errors that had no effect on the CRA performance evaluation. We also reviewed the community development loans, investments, and services submitted by the Bank to ensure the loans, investments, and services met the regulatory definition for community development. We excluded some items submitted for consideration because the activities did not meet the definition or purpose of community development.

Our conclusions related to community development loans and qualified investments are based on the number and dollar amounts made during the evaluation period. In addition, we considered the level of innovation, complexity, responsiveness to community credit needs, and the degree to which investment instruments are not routinely provided by private investors.

### Selection of Areas for Full-Scope Review

The Bank has two AAs in Florida. The MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) AA will receive a full-scope review. It represents 97.1 percent of the Bank's deposits as of June 30, 2017 and 95.1 percent of the total number of loans analyzed at this examination.

MSA 33100 is comprised of three Metropolitan Divisions (MDs), including MD 33124 (Miami-Miami Beach-Kendall, FL) which consists of Miami-Dade County, MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL) which consists of Broward County, and MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) which consists of Palm Beach County.

The remaining AA, a portion of MSA 36740 (Orlando-Kissimmee-Sanford, FL) including only Orange and Osceola Counties received a limited-scope review. This AA represents 2.9 percent of the Bank's total deposits as of June 30, 2017 and 4.9 percent of the total number of loans analyzed at this examination. Refer to Appendix A for additional information regarding the AA receiving a full-scope review.

## **Ratings**

The Bank's overall rating is based primarily on the AA that received a full-scope review. Business lending received the most weight considering the Bank's strategic focus. The lending test received the most weight when arriving at an overall rating. We based our evaluation of lending performance on home mortgage loans and small businesses loans reportable under the HMDA and CRA requirements during the evaluation period. The level and responsiveness of the Bank's community development lending to the community credit needs was also factored into the Lending Test.

For the Investment Test, the level of current period investments was more heavily weighted as well as the responsiveness to the community needs. For the Community Development Test, the Retail Banking Services is more heavily weighted than the Community Development Services.

In determining conclusions related to lending activity, aggregate data, home mortgage, and small business data, we used peer mortgage data for 2016 and 2017. For peer business data we used the 2016 peer business data, as it was the most recent peer business data available at the time of our evaluation.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the Bank, or in any assessment area by an affiliate whose loans have been considered as part of the Bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Conclusions with Respect to Performance Tests

### LENDING TEST

#### Conclusions for Areas Receiving Full-Scope Reviews

The Bank's performance under the Lending Test in Florida is rated "Outstanding," when considering the Bank's excellent level of community development lending that enhanced the good level of lending in the full-scope MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL).

#### Lending Activity

*Overall, the Bank's lending activity reflects good responsiveness to AA credit needs for home mortgages and small business loans given the performance context in MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL). Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the Bank's lending activity. Lending activity for both home mortgages and business lending activity was good considering performance context.*

Multiple performance context factors had an impact on CNB's lending activity. The Bank continues to increase organic growth during the evaluation period but was challenged with strong competition in its AAs with a large number of lenders reporting home mortgage and business lending activity. These lenders include non-bank lenders that do not take deposits in the AA as well as large banks with a nationwide presence that offer a wide variety of home mortgage loan products and credit card banks with a large count of business loans that have small dollar average loan sizes.

During the evaluation period, economic recovery from the recession continued with the reduction of high unemployment rates, increase in business activity, and improvement in home values from negative equity positions. Home sales prices remain high in the Bank's AAs. More stringent underwriting practices also factored into loan production among banks as well as investors purchasing residential properties with cash that has further reduced the stock of affordable housing for LMI people. Obtaining subsidized residential lending for LMI people poses difficulty due to a sometimes lengthy loan process not timely enough to obtain an available property. The limited availability of funding for subsidies also poses challenges. All the mentioned factors impacted overall lending activity during the evaluation period for lenders in the Bank's AA. For further discussion of performance context factors, please see the Market Profile in Appendix B.

FDIC data, as of June 30, 2017, shows that CNB had a deposit market share of approximately 2.8 percent ranking 9th out of 99 financial institutions reporting deposits in MSA 33100. Bank of America National Association (NA), Wells Fargo NA, and JP Morgan Chase Bank rank 1st, 2nd, and 3rd, respectively, with market shares of approximately 17.0, 15.7, and 8.6 percent. These three banks dominate the deposit market share at approximately 41.3 percent.

For home mortgage loans, CNB's market share and rank is lower than its deposit market share. CNB's lender market share (by number of loans), based on aggregate data from 2017 is approximately 0.2 percent, and the Bank is ranked 92nd out of 976 mortgage lenders reporting home mortgage loans in the MSA 33100. This level would normally be considered poor. However, when considering that

there are 976 mortgage lenders in the market with many of them much larger in size or more specialized than CNB and offering a broader range of mortgage lending options, the Bank's level of lending is considered good. The home mortgage market in the AA is dominated by Wells Fargo National Association (NA), Quicken Loans, and Caliber Home Loans, Incorporated respectively ranking 1st at approximately 10.2 percent, 2nd at 5.1 percent, and 3rd at 4.3 percent with a combined market share of approximately 19.6 percent.

Lending activity for reportable businesses loans is good based on the market share by dollar amount. The Bank's market share of small loans to businesses of approximately 2.0 percent is somewhat lower than its deposit market share and its lender share rank of 12<sup>th</sup> out of 239 lenders is near its deposit market share rank. The dollar market share is a better indicator given that the banks with the higher market share by count of loans are all credit card banks that originate smaller average sized business loans that are less than \$40,000. CNB, unlike the credit card banks, has an average loan size of \$341,000. Based on the number of loans, the Bank's market share of small loans to businesses is approximately 0.2 percent and ranks 38th out of 239 lenders. American Express FSB (Federal Savings Bank) ranks first at approximately 25.6 percent, Citibank NA ranks 2<sup>nd</sup> at approximately 19.2 percent, and Bank of America NA ranks 3<sup>rd</sup> at approximately 13.0 percent. These banks dominate the market with a total lender market share by count of loans of approximately 57.8 percent. The total lender share shrinks to approximately 34.5 percent when considering the total lender share by dollar.

CNB also has a good level of small business loans (revenues of \$1 million or less) with an approximate 2.0 percent lender market share and ranked 10th out of 239 lenders. The Bank's lender rank is near its deposit market share rank, and its lender share is somewhat lower than its deposit market share. American Express FSB, Bank of America NA, and Citibank dominate the market with a total loan count market share of approximately 69.7 percent and dollar market share of approximately 43.2 percent.

## **Distribution of Loans by Income Level of the Geography**

Refer to Table O in appendix C for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

*Overall, the geographic distribution of loans is good in MSA 33100, given performance context. The geographic distribution of home mortgage loans and small loans to businesses is good, given performance context. For a further discussion of these and other performance context factors, please see the Market Profile in Appendix B.*

### **Home Mortgage Loans**

*Overall, the geographic distribution of home mortgage loans is good given performance context in MSA 33100. For the years 2015-2016, the Bank's mortgage lending in low-income geographies exceeded the percentage of owner-occupied housing units and exceeded the aggregate lending in low-income geographies. For moderate-income geographies, the lending was somewhat lower than the percentage of owner occupied units but exceeded the aggregate lending.*

For 2017, CNB's lending in low-income geographies is near the percentage of owner-occupied housing units and exceeded the aggregate lending in low-income geographies. For moderate-income

geographies, the lending was somewhat lower than the percentage of owner occupied units and the aggregate lending.

### ***Small Loans to Businesses***

Refer to Table Q in appendix C for the facts and data used to evaluate the geographic distribution of the Bank's origination/purchase of small loans to businesses.

*The geographic distribution of small loans to businesses is good.* For the years 2015-2016, the percentage of small loans to businesses in low-income geographies exceeded both the percentage of businesses in low-income geographies and the aggregate lending. The percentage of small loans to businesses in moderate-income geographies exceeded both the percentage of businesses in moderate-income geographies and the aggregate lending.

In 2017, the percentage of small loans to businesses in low-income geographies is lower than both the percentage of businesses in low-income geographies and the aggregate lending. The percentage of small loans to businesses in moderate-income geographies is near to both the percentage of businesses in moderate-income geographies and the aggregate lending.

### ***Lending Gap Analysis***

*There were no unexplained conspicuous lending gaps.* The geographic distribution of loans indicated no unexplained conspicuous gaps when considering branch office locations and performance context.

### ***Inside/Outside Ratio***

*A substantial majority of the Bank's loans are in the AA.* This analysis is performed at the bank level rather than AA levels. A substantial majority of home mortgage and small loans to businesses originated or purchased by CNB during the evaluation period are within the Bank's AA. By number, 94.3 percent of loans and 89.1 percent of the dollar amount are inside the Bank's overall AA. This level of performance was positively factored into the overall analysis of the distribution of loans by income level of the geography.

By product, 90.9 percent of home mortgage loans by number and 85.9 percent by dollar amount are inside the overall AA. For small loans to businesses, 96.3 percent of loans by number and 95.2 percent by dollar amount are inside the Bank's AA.

### **Distribution of Loans by Income Level of the Borrower**

Refer to Table P in appendix C for the facts and data used to evaluate the borrower distribution of the Bank's home mortgage loan originations and purchases.

*Overall, the Bank's distribution of loans by income level of the borrower is good, given performance context.* Both the distribution of home mortgage loans and the distribution of small loans to businesses are good.

## ***Home Mortgage Loans***

During the evaluation period, performance context issues made it difficult to provide home mortgage loans to low-income borrowers in the overall MSA AA. For this reason, more weight was given to lending to moderate-income borrowers in reaching our conclusions.

The lack of affordable housing inventory is a contributor to the Bank's limited origination of loans to low-income borrowers. The median housing value in MSA 33100 during 2015-16 was \$284,593 and \$227,861 in 2017, while poverty levels were high for those periods at 14.0 percent and 16.0 percent, respectively. Loan subsidies are needed to assist low-income and moderate-income borrowers. High property taxes and homeowner's insurance costs also contribute to the inability of low-income and many moderate-income borrowers to become homeowners. Many lower priced homes are quickly purchased for cash by investors, further limiting the number of affordable homes available to LMI buyers. The lower rates offered on the Federal Housing Administration (FHA) product offered by larger lenders is also a competitive factor that challenges CNB's ability to originate to moderate-income buyers that meet FHA guidelines. In addition, it should be noted that the demand for refinance loans by low-income families is generally very limited. Many times low-income families have taken advantage of various subsidy programs and special mortgage products that have very low interest rates that would not make it necessary for them to refinance for a lower interest rate. Furthermore, some special programs do not allow for refinancing. For further discussion on performance context factors, please see the Market Profiles in Appendix B.

*The distribution of home mortgage loans by the income level of the borrower in the MSA 33100 is good considering performance context.* For the years 2015 to 2016, the percentage of home mortgage loans to low-income borrowers is lower than the percentage of low-income families and exceeds the aggregate lending. The percentage of home mortgage loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families and is near the home mortgage aggregate lending in the AA.

For 2017, the percentage of home mortgage loans to low-income borrowers is lower than the percentage of low-income families and exceeds the aggregate lending in the MSA. The percentage of home mortgage loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families and exceeds the home mortgage aggregate lending in the AA.

## ***Small Loans to Businesses***

Refer to Table R in appendix C for the facts and data used to evaluate the borrower distribution of the Bank's origination/purchase of small loans to businesses.

*Overall, the borrower distribution of loans to businesses is good in MSA 33100.* For the years 2015 to 2016, the Bank's percentage of loans to small businesses (businesses with annual revenues of \$1 million or less) is somewhat lower than the percentage of small businesses located in the AA and near the aggregate business lending.

For 2017, the Bank's percentage of loans to small businesses is somewhat lower than the percentage of small businesses located in the MSA and exceeds the aggregate business lending.

## Community Development Lending

Refer to Table 1 Lending Volume in appendix C for the facts and data used to evaluate the Bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans.

*Overall, the Bank's community development lending activity in MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) is excellent and it had a significant positive impact on the overall Lending Test rating. During the community development evaluation period, the Bank made 24 community development loans in MSA 33100 totaling \$192 million. CNB originated a mix of community development loans representing affordable housing (six loans totaling \$34 million), community services (five loans totaling \$26.5 million), revitalization and stabilization of LMI geographies (seven loans totaling \$73 million), and economic development (five totaling \$58 million). The revitalization and stabilization loans provide working capital and purchase funding (real estate and equipment) to businesses for operations and permanent job opportunities. Two loans totaling \$46 million supported economic development by financing the construction of a retail shopping center and a large box retailer that provides jobs for over 360 LMI persons. The retention of jobs is responsive to AA needs as evidenced by the high poverty rates throughout the evaluation period. CNB originated five loans that helped meet critical affordable rental housing needs in the AA, including one apartment complex that includes 208 units with rents that are below market rates.*

The Bank received positive consideration for five community development loans that are located in the broader statewide or regional area in Florida (Daytona, Jacksonville, Tampa, and Tallahassee), because the Bank has been responsive to the needs and opportunities in its AAs. Two of the loans were for economic development that created jobs for LMI people, two revitalized and stabilized moderate-income geographies, and one was for affordable housing.

## Product Innovation and Flexibility

*The Bank makes extensive use of flexible mortgage programs to help meet credit needs in its AA. CNB's use of these flexible programs had a positive impact on conclusions under the Lending Test. The various programs included the following:*

### **CitySmart Community Mortgage Program**

This program is available to low- and moderate-income borrowers in all of the Bank's AA for home purchase or refinance purposes. The mortgage features flexible underwriting criteria including low credit score requirements, high loan-to-value (LTV) ratios without private mortgage insurance requirements, and closing cost and down payment assistance. During the evaluation period, the Bank originated 80 CitySmart mortgages in its AAs. In 2016, the Bank offered a special low rate of 3.99 percent and extended the promotion to 2017.

As long as a borrower is within CNB's AAs and qualifies for the CitySmart Mortgage they will also qualify for both the CitySmart Down Payment and Closing Cost Assistance Programs. A qualified CitySmart borrower can be approved for up to \$4,000.00 in combined assistance. The closing cost assistance is 2.0 percent of the loan amount up to a maximum of \$2,000.00, and the down payment



assistance is also 2.0 percent of the loan amount up to a maximum of \$2,000.00. CNB set the assistance limit based on an average loan amount obtained by low- and moderate-income borrowers of \$100,000.

### **CitySmart Refinance Program**

The Bank is aware of the difficulties faced by LMI borrowers when attempting to refinance. The majority have additional liens due to subsidies received to obtain the original loan, challenging property values depending on the time of the purchase, credit qualification requirements, etc. Taking these factors into consideration, CNB designed a refinance program in which existing CitySmart Mortgage borrowers can qualify to refinance their mortgage without any costs to take advantage of low interest rates resulting in a reduction of their monthly payment. This program demands additional resources versus a standard refinance offered for a secondary market loan. CNB's CitySmart Refinance Program assists the borrower with the subordination of any second or third lien which is time consuming and requires expertise and knowledge of all governmental and down payment assistance programs from all parties involved in the transaction. The Bank assists borrowers with obtaining their initial down payment assistance liens subordinated and in many cases exceptions were required due to the subsidies and program limitations. Five loans totaling \$481,613 resulted during the evaluation period.

### **Financial Hardship Payment Deferment and Loan Modification Program**

This program provides a payment deferment option for existing CNB customers meeting certain criteria afflicted by a financial hardship. Payments can be deferred for a maximum of 90 days, and the Bank will not charge interest on the deferred payment. The Bank also has a Loan Modification Program which, if qualified, the borrower can be approved for a reduced interest rate for the term of their loan reducing their monthly mortgage payment. In addition, all customers are provided information regarding government assistance funds for foreclosure prevention. During the evaluation period, CNB provided assistance resulting in 20 loans totaling \$1.9 million.

### **Community Advantage City Line**

This program caters to Small Businesses to assist with working capital. It provides up to \$10,000 in a revolving line of credit. The program has flexible guidelines for new businesses (operating less than 2 years), reduced closing costs (\$150 application fee) and access to checks. During 2017, a promotion was offered with no application fee charged. This initiative resulted in 79 business owners taking advantage of this financial option with total loans of \$790,000.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on the limited-scope review, the Bank's performance under the Lending Test in MSA 36740 (Orlando-Kissimmee-Sanford, FL) is adequate but weaker than the Bank's overall "Outstanding" performance under the Lending Test. The performance is weaker considering only two branches servicing a large and competitive AA. The deposit market share is small at 2.9 percent. Performance in the limited-scope AA had a neutral impact on the overall Lending Test conclusion. Refer to Tables in appendix C for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The Bank's performance under the investment test in Florida is rated "High Satisfactory." Based on a full-scope review, the Bank's performance in MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) is good. Refer to Table 14 in Appendix C for the facts and data used to evaluate the Bank's level of qualified investments.

*CNB had a significant level of qualified CD investments and grants with good responsiveness.* The Bank had 24 current period qualified investments that totaled \$21.1 million with one prior period investment totaling \$23.7 million. There were also 41 donations totaling \$127,000 to organizations whose primary purpose meets the definition of community development. The Bank invests in the following funds that include various additional investment purchases:

- An investment of \$14.0 million in the CRA Qualified Investment Fund from Community Capital Management. The investments in this fund are primarily Fannie Mae MBS on properties that are helping to provide rental housing affordable to LMI residents. The fund also has a portion of Freddie Mac, Small Business Administration (SBA) Loans, and Florida Housing Finance Corporation Homeownership Mortgage Revenue Bonds. This portion of the fund assists LMI individuals with affordable housing and provides loans to small businesses that employ LMI individuals.
- An investment in a Community Development Fund for \$8.5 million with Community Development Fund Advisors, of which \$7.7 million was invested in MSA 33100. The Fund provides monies for single-family and multi-family affordable housing.

The prior period investment in a local stadium bond continues to provide jobs for primarily LMI workers. There were 41 donations totaling \$127,000 that were to organizations whose primary purpose meets the definition of community development. There were an additional 11 donations totaling \$92,000 with a purpose, function, and mandate that includes the bank's AA.

The Bank's community development investments are responsive to AA needs, primarily addressing the need for affordable housing and permanent jobs for low- and moderate-income individuals. Affordable housing needs are considered critical throughout the overall MSA AA. Investments are not considered innovative or complex, and private investors routinely provide these types of qualified investments.

### Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the Bank's performance under the Investment Test in the MSA 36740 (Orlando-Kissimmee-Sanford, FL) area was not inconsistent with the "High Satisfactory" performance under the Investment Test.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

CNB's performance in Florida under the service test is rated "High Satisfactory." Based on a full-scope review, the Bank's performance in MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) is good considering good retail banking services and excellent community development services. Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the Bank's branch delivery system and branch openings and closings.

### Retail Banking Services

*The Bank's delivery systems are accessible to essentially all portions of the AA.* The Bank had 24 full-service branches in MSA 33100 during the evaluation period. The branch distribution includes one geography with no income designation, two low-, two moderate-, five middle-, and 14 upper-income geographies. The percentage of the Bank's branch offices in low-income geographies exceeds the percentage of population within the low-income geographies. The percentage of the Bank's branch offices in moderate-income geographies is lower than the percentage of population within the moderate income geographies. However, all the branches are adjacent to some low- or moderate-income geographies. Home mortgage and business lending patterns during the evaluation period indicate the Bank is serving essentially all adjacent LMI geographies.

*During the evaluation period, the opening and closing of branches did not adversely affect the accessibility of the Bank's delivery systems, particularly LMI geographies or individuals.* One branch in an upper-income geography relocated to another site in the same upper-income geography.

*Business hours are tailored to the convenience and needs of their respective area, regardless of the income level of the geography.* Branch offices are augmented by a variety of alternative retail delivery channels, including ATM, telephone banking, and online banking. There is no data on the effectiveness of these alternative retail delivery systems; therefore, no significant weight was given to these systems. Additionally, the Bank offers 36 automated teller machine (ATM) facilities located primarily at all the branch locations as well as nearby areas.

CNB offers one low-cost economy deposit product to assist in meeting the needs of the South Florida business community. CNB@Work is available to the employees of the Bank's business clients, and benefits include no maintenance charges on a CNB@Work checking account, complimentary use of the online banking platform with bill pay, and discounted pricing on consumer loan rates (excluding equity lines of credit and CD loans), subject to credit approval and program requirements. During the evaluation period, 892 new accounts were opened. In addition, the Bank remains engaged with third-party service providers to expand their services and outreach efforts.

## Community Development Services

*The Bank is a leader in providing community development services throughout MSA 33100 that are responsive to AA needs, particularly those related to affordable housing. Considering the level of participation and the number of organizations and individuals benefiting, the level of community development services is excellent.*

During the evaluation period, at least 35 different officers and employees performed approximately 3,543 community development service hours to at least 70 different qualifying organizations in the AA, frequently in positions of leadership. They shared their financial expertise by serving as board members, officers, and loan or finance committee members to organizations that help provide affordable housing opportunities, as well as economic development opportunities, small business lending, and community services to LMI individuals and families.

CNB employees, through the Bank's initiatives or various organizations, participated in numerous homebuyers or financial literacy workshop events as leaders, teachers or facilitators. The most successful workshop was a partnership with the Miami-Dade County Commissioner and Global Empowerment Development Inc., drawing over 200 participants. In addition, employees spent 174 service hours assisting LMI individuals navigate through the Section 8 Self Sufficiency program to move from Section 8 rental to Section 8 homeownership. The Family Self-Sufficiency (FSS) program is a United States Department of Housing and Urban Development (HUD) employment and savings incentive program for low-income families who have a Housing Choice Voucher (HCV), a.k.a. Section 8, or live in public housing. CNB is one of two banks participating in the program. Furthermore, employees aided LMI individuals and families navigating through subsidy down payment assistance applications, resulting in \$3.2 million in grants throughout the AA.

Examples of other organizations that CNB frequently provides community development services include:

**Housing Foundation of America:** Established in October 2005, Housing Foundation of America, Inc. provides services for first-time home buyers, distressed homeowners, and any other needs as it pertains to workforce housing. Housing Foundation of America, Inc. and its affiliates strive every day to provide quality assistance to those in need.

**Neighborhood Housing Services of South Florida:** Established in 1978, NHSSF is a 501(c)(3) chartered member of the NeighborWorks® network. They are amongst a nationwide network of 245 trained and certified community development organizations at work in more than 4,400 communities across America. NHSSF provides a full spectrum of homeownership services in English and Spanish to assist potential homebuyers in reaching their homeownership goals and assist current owners in preserving their homes

**IRS Volunteer Income Tax Assistance Program:** The Volunteer Income Tax Assistance (VITA) program offers free tax help to people who generally make \$54,000 or less, persons with disabilities and limited English-speaking taxpayers who need assistance in preparing their tax returns. IRS-certified volunteers provide free basic income tax return preparation with electronic filing to qualified individuals.

**Delray Beach Community Land Trust**: This organization provides housing opportunities for low and moderate-income individuals to secure housing that is decent, affordably priced and controlled by the residents on a long-term basis.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the Bank's performance under the Service Test in MSA 36740 (Orlando-Kissimmee-Sanford, FL) is not inconsistent with the Bank's "High Satisfactory" performance under the Service Test. Refer to Table 15 in appendix C for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

---

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): 01/01/2015 to 12/31/2017 Investment and Service Tests: 01/1/2015 to 12/31/2017 CD Loans: 01/01/2015-12/31/2017)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
City National Bank Miami, Florida	Home mortgage loans (home purchase, home improvement, and refinance), small loans to businesses, community development loans, investments, and services.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL)	Full-Scope	Miami-Dade, Broward, and Palm Beach Counties
MSA 36740 (Orlando-Kissimmee-Sanford, FL)	Limited Scope	Includes Orange and Osceola Counties only

## Appendix B: Community Profiles for Full-Scope Areas

### MIAMI-FT. LAUDERDALE-PALM BEACH ASSESSMENT AREA (MSA 33100)

The full-scope AA consists of all of the Miami-Ft. Lauderdale-Palm Beach MSA, which includes all of the contiguous counties of Miami-Dade, Broward, and Palm Beach. The Census Bureau has designated each of the three counties in the full-scope AA as a Metropolitan Division (“MD”). The AA meets the requirements of the CRA regulation and does not arbitrarily exclude LMI geographies. The accompanying table and discussion focuses on all three counties collectively.

Table A – Demographic Information of the Assessment Area						
Assessment Area: MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,219	6.2	28.2	29.5	33.6	2.5
Population by Geography	5,861,000	5.8	28.9	31.5	33.4	0.4
Housing Units by Geography	2,484,604	5.5	27.9	30.9	35.3	0.3
Owner-Occupied Units by Geography	1,248,038	2.6	23.2	32.9	41.2	0.2
Occupied Rental Units by Geography	799,004	10.1	36.4	30.1	22.9	0.5
Vacant Units by Geography	437,562	5.6	25.9	26.7	41.2	0.6
Businesses by Geography	797,472	4.2	21.8	28.2	44.6	1.2
Farms by Geography	12,328	4.6	24.0	29.5	41.5	0.4
Family Distribution by Income Level	1,330,793	23.1	17.0	17.7	42.2	0.0
Household Distribution by Income Level	2,047,042	25.1	15.7	16.6	42.6	0.0
Median Family Income MSA - 33100		\$57,606	Median Housing Value			\$227,861
FFIEC Adjusted Median Family Income for 2017		\$59,917	Median Gross Rent			\$1,194
Households Below Poverty Level		16%	Families Below Poverty Level			13.5%
<i>Source: 2015 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

MSA 33100 had a total population of approximately six million people, with the largest concentration of population in the Miami-Dade County. According to the 2015 Census, MSA 33100 consisted of 1,219 geographies distributed as follows: 76 (6.2 percent) low-income, 344 (28.2 percent) moderate-income, 360 (29.5 percent) middle-income, 410 (33.6 percent) upper-income and 37 (2.5 percent) no income designation.

The poverty level is high at 16.0 percent of the households and 13.5 percent of the families. LMI people have difficulty purchasing homes given the high housing costs and the added costs of insurance and taxes. Rents are also high for rental properties. The median monthly gross rent is \$1,194. LMI people and particularly low-income people would need assistance through subsidy programs for purchasing a home as well as for rental housing. Based on the adjusted median family income, low-income is

considered less than 50 percent of the median family income which would be an income of less than \$29,959 per year. Moderate income is less than 80 percent of the median income but not less than 50 percent of the median family income for incomes of \$29,959 to less than \$47,934. The median home value in 2017 was \$227,861 and is down from \$284,593 in 2016. Community contacts indicate that the need for affordable housing is a critical need in the AA as well as capital for small businesses and entrepreneurs, and financial literacy. CNB has been responsive to the community needs and has offered customized lending programs and CD services to address the needs of the AA.

MSA 33100 was severely impacted by the housing crisis that had its beginnings in 2006 and 2007 leading to the national recession that ended in 2009. Recovery has been sluggish during the evaluation but improving when considering the increased employment, decrease in foreclosure filings, increase in home sales, and other conditions. According to the Bureau of Labor Statistics, the State of Florida unemployment rate during the evaluation period as of December 2015, 2016, and 2017 was 5.1 percent, 4.7 percent, and 3.9 percent, respectively, and represents a declining trend in unemployment. As presented in the table below, the unemployment rates of the U.S. and the counties that make up the MSA are also on a declining trend.

	<b>December 2015</b>	<b>December 2016</b>	<b>December 2017</b>
<b>United States</b>	5.0	4.7	4.1
<b>State of Florida</b>	5.1	4.7	3.9
<b>Miami-Dade County</b>	5.5	4.9	4.5
<b>Broward County</b>	4.6	4.2	3.4
<b>Palm Beach County</b>	4.7	4.3	3.5

Competition for financial services within MSA is intense and includes several branches of nationwide and regional banks, local community banks, credit unions, mortgage companies, and other nonbank financial service providers. As of June 30, 2017, the FDIC reports CNB’s deposits in the MSA total \$6.4 billion or 97.1 percent of total deposits. CNB ranked 9<sup>th</sup> out of 99 financial institutions with a 2.8 percent market share. Competition for home mortgage and business lending including small business is also intense.

The five largest employers in the AA include Publix Super Markets (38,241 employees), Baptist Health South Florida (16,191 employees), University of Miami (14,664 employees), Tenet Health Corporation (12,170 employees), and Jackson Health System of Miami (11,410 employees).

There are numerous nonprofit organizations located in the AA. These organizations provide various services to LMI people or small businesses, such as affordable housing opportunities, financial literacy training, support for economic development activities, etc. Opportunities exist for banks to make donations, originate or purchase loans, to partner with the nonprofit organizations with a CD mission or purpose in loan relationships to LMI or small businesses, conduct literacy workshops, and more. Investment opportunities are highly competitive with banks purchasing investments to support the markets of affordable housing for LMI individuals and small business lending.



## Appendix C: Tables of Performance Data

---

### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “Bank” include activities of any affiliates that the Bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the Bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the Bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (j) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the Bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the Bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies compared to

the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data are not available for geographic areas smaller than counties, it may be necessary to compare Bank loan data to aggregate data from geographic areas larger than the Bank's assessment area.

- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the Bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the Bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the Bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the Bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the Bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households throughout those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the Bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MA/assessment area.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the Bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments

are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the Bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the Bank's assessment area. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings -** Compares the percentage distribution of the number of the Bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Table 1. Lending Volume**

LENDING VOLUME		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017				
Assessment Area):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL	95.1	639	604,051	1,190	364,967	0	0	24	192,570	1,853	1,161,588	97.1
<b>Limited Review:</b>												
MSA 36740 Orlando-Kissimmee-Sanford, FL	4.9	53	26,746	41	8,684	0	0	2	4,361	96	39,791	2.9
Statewide With No Purpose/Mandate/Function To Serve The AA	0	0	0	0	0	0	0	5	31,407	5	31,407	0

\* Loan Data from January 1, 2015 through December 31, 2017. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 1, 2015 to December 31, 2017.

\*\*\* Deposit Data as of June 30, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography**

**2015-2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
<b>Full Review</b>																			
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL	396	368,306	94.5	145,423	2.1	4.8	1.2	23.1	16.9	16.8	36.3	22.7	36.9	38.6	55.3	45.0	0.0	0.3	0.1
<b>Limited Review</b>																			
MSA 36740 Orlando-Kissimmee-Sanford, FL	23	11,616	5.5	52,289	0.6	0.0	0.3	25.2	13.0	19.2	40.5	52.2	43.0	33.6	34.8	37.4	0.0	0.0	0.0
<b>Total</b>	<b>419</b>	<b>379,922</b>	<b>100.0</b>	<b>197,712</b>	<b>1.8</b>	<b>4.5</b>	<b>1.0</b>	<b>23.5</b>	<b>16.7</b>	<b>17.4</b>	<b>37.1</b>	<b>24.3</b>	<b>38.5</b>	<b>37.6</b>	<b>54.2</b>	<b>43.0</b>	<b>0.0</b>	<b>0.2</b>	<b>0.1</b>

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2017**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
<b>Full Review</b>																				
MSA 33100 Miami-Ft Lauderdale- West Palm Beach FL	243	235,745	89.0	140,541	2.6	2.5	2.3	23.2	15.2	20.5	32.9	17.7	34.1	41.2	63.0	42.8	0.2	1.6	0.4	
<b>Limited Review</b>																				
MSA 36740 Orlando- Kissimmee- Sanford, FL	30	15,130	11.0	52,871	1.6	3.3	1.6	25.5	6.7	22.0	36.8	43.3	40.2	36.1	46.7	36.1	0.0	0.0	0.0	
<b>Total</b>	<b>273</b>	<b>250,875</b>	<b>100.0</b>	<b>193,412</b>	<b>2.4</b>	<b>2.6</b>	<b>2.1</b>	<b>23.6</b>	<b>14.3</b>	<b>20.9</b>	<b>33.6</b>	<b>20.5</b>	<b>35.7</b>	<b>40.2</b>	<b>61.2</b>	<b>41.0</b>	<b>0.1</b>	<b>1.5</b>	<b>0.3</b>	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2015-2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
<b>Full Review</b>																				
MSA 33100 Miami-Ft Lauderdale- West Palm Beach FL	396	368,306	94.5	145,423	22.4	5.1	2.2	17.3	8.8	9.6	18.9	1.5	17.6	41.3	54.3	53.7	0.0	30.3	16.8	
<b>Limited Review</b>																				
MSA 36740 Orlando- Kissimmee- Sanford, FL	23	11,616	5.5	52,289	21.7	0.0	3.4	19.2	0.0	13.4	20.8	0.0	19.5	38.3	69.6	45.7	0.0	30.4	18.0	
<b>Total</b>	<b>419</b>	<b>379,922</b>	<b>100.0</b>	<b>197,712</b>	<b>22.3</b>	<b>4.8</b>	<b>2.6</b>	<b>17.7</b>	<b>8.4</b>	<b>10.6</b>	<b>19.3</b>	<b>1.4</b>	<b>18.1</b>	<b>40.7</b>	<b>55.1</b>	<b>51.6</b>	<b>0.0</b>	<b>30.3</b>	<b>17.1</b>	

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2017**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
<b>Full Review</b>																				
MSA 33100 Miami-Ft Lauderdale- West Palm Beach FL	243	235,745	89.0	140,541	23.1	3.7	2.6	17.0	12.3	10.6	17.7	3.7	18.9	42.2	60.5	50.9	0.0	19.8	17.0	
<b>Limited Review</b>																				
MSA 36740 Orlando- Kissimmee- Sanford, FL	30	15,130	11.0	52,871	23.7	3.3	3.4	18.3	13.3	12.3	19.1	10.0	21.3	38.9	50.0	44.8	0.0	23.3	18.1	
<b>Total</b>	<b>273</b>	<b>250,875</b>	<b>100.0</b>	<b>193,412</b>	<b>23.3</b>	<b>3.7</b>	<b>2.8</b>	<b>17.3</b>	<b>12.5</b>	<b>11.1</b>	<b>18.0</b>	<b>4.4</b>	<b>19.5</b>	<b>41.5</b>	<b>59.3</b>	<b>49.3</b>	<b>0.0</b>	<b>20.1</b>	<b>17.3</b>	

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0



<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2015-2016</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
<b>Full Review</b>																				
MSA 33100 Miami-Ft Lauderdale- West Palm Beach FL	794	248,773	96.5	242,848	3.4	3.5	3.2	21.8	23.9	20.5	30.3	23.6	28.5	43.7	46.7	46.8	0.8	2.3	0.9	
<b>Limited Review</b>																				
MSA 36740 Orlando- Kissimmee- Sanford, FL	29	6,149	3.5	41,405	0.7	0.0	0.6	29.7	51.7	26.8	35.7	24.1	34.2	33.9	24.1	38.4	0.0	0.0	0.0	
<b>Total</b>	<b>823</b>	<b>254,922</b>	<b>100.0</b>	<b>284,253</b>	<b>2.9</b>	<b>3.4</b>	<b>2.8</b>	<b>23.2</b>	<b>24.9</b>	<b>21.4</b>	<b>31.2</b>	<b>23.6</b>	<b>29.4</b>	<b>42.0</b>	<b>45.9</b>	<b>45.6</b>	<b>0.7</b>	<b>2.2</b>	<b>0.8</b>	
<i>Source: 2016 D&amp;B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0</i>																				

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2017**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
<b>Full Scope</b>																			
MSA 33100 Miami-Ft Lauderdale- West Palm Beach FL	396	116,194	97.1	--	4.2	1.0	3.2	21.8	17.2	20.5	28.2	22.5	28.5	44.6	53.18	46.8	1.2	2.5	0.9
<b>Limited Review</b>																			
MSA 36740 Orlando- Kissimmee- Sanford, FL	12	4,263	3.2	--	2.0	2.0	0.6	30.2	41.7	26.8	32.2	25.0	34.2	35.5	33.3	38.4	0.0	0.0	0.0
<b>Total</b>	<b>408</b>	<b>83,818</b>	<b>100.0</b>	<b>--</b>	<b>3.8</b>	<b>3.8</b>	<b>2.8</b>	<b>23.3</b>	<b>17.9</b>	<b>21.4</b>	<b>29.0</b>	<b>22.5</b>	<b>29.4</b>	<b>43.0</b>	<b>53.2</b>	<b>45.6</b>	<b>1.0</b>	<b>2.5</b>	<b>0.8</b>

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2015-2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
<b>Full Review</b>											
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL	794	248,773	96.5	242,848	85.7	44.0	48.5	3.4	51.3	10.8	1.2
<b>Limited Review</b>											
MSA 36740 Orlando-Kissimmee-Sanford, FL	29	6,149	3.5	41,405	85.0	1.6	47.7	3.3	1.9	11.7	0.0
<b>Total</b>	<b>823</b>	<b>254,922</b>	<b>100.0</b>	<b>284,253</b>	<b>85.6</b>	<b>85.6</b>	<b>48.3</b>	<b>3.4</b>	<b>53.2</b>	<b>11.0</b>	<b>1.2</b>

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2017**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
<b>Full Review</b>											
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL	396	116,099	97.1	--	91.0	49.0	48.5	3.9	47.8	5.1	0.3
<b>Limited Review</b>											
MSA 36740 Orlando-Kissimmee-Sanford, FL	12	2,535t	2.9	--	89.9	2.2	47.7	3.5	0.7	6.7	0.0
<b>Total</b>	<b>408</b>	<b>118,634</b>	<b>100.0</b>	<b>--</b>	<b>90.8</b>	<b>51.2</b>	<b>48.3</b>	<b>3.8</b>	<b>48.5</b>	<b>5.4</b>	<b>0.3</b>

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: FLORIDA				Evaluation Period: JULY 1, 2015 TO DECEMBER 31, 2017			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL	1	\$23,722	65	\$21,246	54	\$ 44,968	96.9	0	0
<b>Limited Review:</b>									
MSA 36740- Orlando-Kissimmee-Sanford, FL	0	0	5	\$1,329	5	\$1,329	2.9	0	0
Statewide With Purpose/Mandate/Function To Serve The AA	0	0	11	92	11	92	0.2	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: FLORIDA Evaluation Period: JULY 1, 2015 TO DECEMBER 31, 2017																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Up			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL	97.1	* 24	93.3	8.3	8.3	20.8	58.3	0	0	0	0	0	0	5.8	28.9	31.5	33.4
<b>Limited Review:</b>																	
MSA 36740 Orlando-Kissimmee-Sanford, FL	2.9	2	6.7	0.0	100.0	0.0	0.0	0	0	0	0	0	0	3.6	34.4	34.2	27.8

\*One branch Office or 4.3 percent is in a no income designated geography.