

## **PUBLIC DISCLOSURE**

May 22, 2023

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Pasco Charter 20976 13315 US Highway 301 South Dade City, FL 33525

Office of the Comptroller of the Currency Tampa Office 4042 Parks Oaks Blvd., Suite 240 Tampa, FL 33610

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.

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## **Overall CRA Rating**

Institution's CRA Rating: Outstanding.

The lending test is rated: Outstanding.

The major factors that support this rating include:

- Given the bank's size, capacity and other performance context factors, the lending test rating is based on a more than reasonable loan-to-deposit ratio, a majority of loans originated in the bank's assessment area and, excellent distribution of loans in low- and moderate-income geographies and among businesses of different sizes.
- Performance related to community development activities has a positive effect on the bank's overall lending rating.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment area, the bank's loan-to-deposit ratio is more than reasonable.

The bank's level of lending, as reflected in the quarterly average loan-to-deposit (LTD) ratio depicted in the table below, is more than reasonable given the bank's size and performance context factors. The bank's LTD ratio since the preceding CRA evaluation (12 quarters starting on March 31, 2019, through December 31, 2021), was 75.1 percent, ranging from a high of 85.3 percent in the third quarter of 2019 to a low of 59.3 percent in the 4Q2021. For the same period, FNBP's ratio was higher than the 65.6 percent LTD ratio of nine similarly situated community banks identified by bank management offering similar lending and deposit products with branch locations in or near the bank's assessment area.

| BANK NAME                             | Total Assets<br>(\$000s)* | Quarterly<br>Average<br>LTD Ratio<br>(%) |
|---------------------------------------|---------------------------|--|
| First National Bank of Pasco          | 279,800                   | 75.1                                     |
| Commerce Bank & Trust                 | 159,803                   | 78.3                                     |
| First Colony Bank of Florida          | 314,151                   | 71.9                                     |
| Surety Bank                           | 199,684                   | 56.0                                     |
| The First National Bank of Mount Dora | 373,897                   | 42.7                                     |
| Community State Bank                  | 203,730                   | 52.3                                     |
| Crews Bank & Trust                    | 224,249                   | 49.6                                     |
| Gulfside Bank                         | 217,297                   | 56.1                                     |
| Central Bank                          | 265,134                   | 103.7                                    |
| Bankflorida                           | 271,634                   | 79.6                                     |

<sup>\*</sup>As of 12/31/2021

## **Lending in Assessment Area**

A majority of the bank's loans are inside its assessment area (AA).

The bank originated and purchased 68.3 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. The 41 loans made inside the AA were factored into the geographic and revenue distribution analysis of the bank's business loans.

| Lending Inside and Out | Lending Inside and Outside of the Assessment Area |          |          |      |                                 |       |      |        |      |          |  |  |  |
|------------------------|---|----------|----------|------|---------------------------------|-------|------|--------|------|----------|--|--|--|
|                        | N   | lumber o | of Loans |      | Dollar Amount of Loans \$(000s) |       |      |        |      |          |  |  |  |
| Loan Category          | Inside Outside                                    |          |          |      | Total                           | Insid | e    | Outsio | de   | Total    |  |  |  |
|                        | #   | %        | #        | %    | #                               | \$    | %    | \$     | %    | \$(000s) |  |  |  |
| Small Business         | 41  | 68.3     | 19       | 31.7 | 60                              | 6,125 | 65.7 | 3,198  | 34.3 | 9,323    |  |  |  |

## **Description of Institution**

First National Bank of Pasco (FNBP) is an intrastate community bank wholly owned by Florida Bancshares, Inc. a one-bank holding company. Both the bank and the holding company are headquartered in Dade City, Florida. The bank was chartered on November 3<sup>rd</sup>, 1986 and is the oldest locally owned community bank in Pasco County. The bank operates out of five locations, four in Pasco County and one in Hillsborough County which opened since the CRA evaluation on January 13, 2020.

As of December 31, 2022, the bank reported total assets of \$285 million and tier one capital of \$27.6 million. For the same period, net loans of \$174 million accounted for 61.0 percent of total assets. During the evaluation period, business loans were the primary loan product representing 83.4 percent of the total loan portfolio with the remaining 16.6 percent secured by 1-4 residential real estate (12.5 percent) and other consumer loans (4.1 percent).

The bank offers an array of loan products and services typical for a small community bank. Although the primary lending focus during the evaluation period was small business loans, the bank acts as a broker with a large home mortgage company that operates within the bank's assessment area in order to accommodate its customers for residential real estate financing needs. Banking services include alternative banking to include debit cards, remote deposit capture and online and mobile banking at no cost. In addition, the bank offers personal and business checking accounts with no monthly maintenance fees when opt out of receiving paper account statements. The bank offers automated teller machines (ATMs) at bank locations and two remote non-deposit taking ATMs located in Pasco County. All branches except for the Tampa office, have a drive-thru teller facility.

In response to COVID-19, Small Business Administration (SBA) Payment Protection Program (PPP) loans under the CARES Act were offered to small businesses throughout the country. SBA's PPP was designed to maintain and stabilize small businesses during the pandemic. Although not an SBA lender, FNBP's participation in the 1<sup>st</sup> round (2020) and the 2<sup>nd</sup> round (2021) resulted in originating 322 PPP loans totaling \$20.1 million which provided much needed funds to support struggling businesses during the pandemic. Positive consideration for response to the pandemic is reflected in respective lending analysis and community development performance.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AA. The bank received a Satisfactory rating in its previous CRA evaluation dated April 15, 2019.

## **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

This Performance Evaluation (PE) assesses the bank's record of meeting the credit needs of the community it which it operates. We evaluated the bank's performance under the Small Bank Community Reinvestment Act (CRA) procedures, which includes a lending test and at the bank's option, a community development (CD) test. The lending test evaluates the bank's record of meeting the credit needs of the assessment area through its lending activities. In addition, management provided us with a list of CD activities for consideration to enhance the overall lending performance rating, if applicable. The CD test evaluates the bank's responsiveness to community credit needs in its assessment area with CD loans, qualified investments, and CD services.

The evaluation period for the Lending Test is January 1, 2019, through December 31, 2021, and for the CD test, January 1, 2019, through December 31, 2022. The bank provided a report with data of all loans made during the evaluation period. A total of 668 loans totaling \$232.2 million were made in 2019 through 2021 of which 91.5 percent was centered in business loans. Based on the loan origination report and FNBP's lending strategy, we determined the primary loan product and focus for the evaluation period is business lending. Our conclusions are based on an analysis of a random sample of business loans originated during the evaluation period. We used this same random sample for all lending performance tests.

## **Selection of Areas for Full-Scope Review**

The bank operates five offices within one assessment area located in the State of Florida. The State of Florida was selected for a full-scope review.

## **Ratings**

The bank's overall rating is based on the lending performance in the Tampa MSA AA which is comprised of Hillsborough, Pasco, and Pinellas Counties.

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

Pursuant to 12 CFR 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 AA 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.

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## **State Rating**

#### State of Florida

**CRA** rating for the State of Florida<sup>1</sup>: Outstanding.

The Lending Test is rated: Outstanding.

The major factors that support this rating include:

- Given the bank's size, capacity and other performance context factors, the lending test rating in the State of Florida is based on a more than reasonable loan-to-deposit ratio, a majority of loans originated in the bank's assessment area and, excellent distribution of loans in low-and moderate-income geographies and among businesses of different sizes.
- Performance related to community development activities in the state has a positive effect on the bank's overall lending rating.

## **Description of Institution's Operations in Florida**

FNBP operates four full-service branches in Pasco County which includes one location in Dade City, two in Zephyrhills and one in Lutz. The Tampa office located in Hillsborough County is open by appointment only. All offices have ATM access and drive-up teller facilities except for the Tampa office which does not have a drive-thru. The bank also has two remote non-deposit taking ATMs located in Pasco County. The bank offers an array of loan and deposit products typical for a small community bank. Banking services include alternative banking such as debit card services, remote deposit capture and online and mobile banking at no cost. Although the bank provides a variety of lending programs, its primary focus has been commercial loans.

FNBP's AA consists of all census tracts that comprise Hillsborough, Pasco and Pinellas Counties which is part of the Tampa-St. Petersburg-Clearwater, FL MSA. The AA meets the legal requirements of the CRA and does not arbitrarily exclude any low-and moderate-income geographies.

There is strong competition in the bank's AA for financial services from other local community banks as well as regional and larger institutions that have a nationwide footprint. Based on FDIC's June 30, 2021, deposit market share report for the assessment area, FNBP ranks 32<sup>nd</sup> out of 53 financial institutions operating out of 606 offices with a 0.2 percent deposit market share.

As part of this evaluation, the OCC consulted two nonprofit organizations working in the assessment area, one an economic development organization whose mission is to attract new and diversified businesses and retain those existing businesses with assistance and support and the other an affordable housing organization whose mission is to serve low- and moderate-income individuals and families

This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

affordable housing needs by providing personal financial and homebuyer education assistance. Critical credit needs identified for this evaluation period include assisting small businesses in obtaining small business loans as well as providing financial expertise and to support affordable housing initiatives with loans and grants to nonprofit organizations for operating costs.

Tampa MSA

| Table A – Demographic Information of the Assessment Area                |           |               |                    |                  |                 |               |  |  |  |  |  |  |
|---|-----------|---------------|--------------------|------------------|-----------------|---------------|--|--|--|--|--|--|
| Assessment Area: Tampa MSA 2021   |           |               |                    |                  |                 |               |  |  |  |  |  |  |
| Demographic Characteristics   | #         | Low<br>% of # | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |  |  |  |  |  |  |
| Geographies (Census Tracts)   | 701       | 5.8           | 24.8               | 35.4             | 31.7            | 2.3           |  |  |  |  |  |  |
| Population by Geography   | 2,713,649 | 4.8           | 23.1               | 36.9             | 34.8            | 0.4           |  |  |  |  |  |  |
| Housing Units by Geography  | 1,284,294 | 4.6           | 24.1               | 38.2             | 32.9            | 0.2           |  |  |  |  |  |  |
| Owner-Occupied Units by Geography                                       | 682,598   | 2.1           | 20.2               | 38.2             | 39.4            | 0.1           |  |  |  |  |  |  |
| Occupied Rental Units by Geography                                      | 392,451   | 8.8           | 28.4               | 38.2             | 24.1            | 0.4           |  |  |  |  |  |  |
| Vacant Units by Geography   | 209,245   | 5.1           | 28.7               | 38.0             | 28.1            | 0.1           |  |  |  |  |  |  |
| Businesses by Geography   | 369,910   | 4.2           | 19.5               | 33.5             | 42.5            | 0.3           |  |  |  |  |  |  |
| Farms by Geography  | 8,491     | 3.3           | 22.4               | 38.0             | 36.1            | 0.1           |  |  |  |  |  |  |
| Family Distribution by Income Level                                     | 654,604   | 21.3          | 17.6               | 18.8             | 42.3            | 0.0           |  |  |  |  |  |  |
| Household Distribution by Income Level                                  | 1,075,049 | 23.8          | 16.1               | 17.3             | 42.8            | 0.0           |  |  |  |  |  |  |
| Median Family Income MSA – 45300<br>Tampa-St. Petersburg-Clearwater, FL |           | \$58,916      | Median Housi       | ing Value        |                 | \$158,005     |  |  |  |  |  |  |
|   |           |               | Median Gross       | Rent             |                 | \$983         |  |  |  |  |  |  |
|   |           |               | Families Belo      | w Poverty Le     | evel            | 11.2%         |  |  |  |  |  |  |

Source: 2015 ACS Census and 2020 D&B Data Due to rounding, totals may not equal 100.0

(\*) The NA category consists of geographies that have not been assigned an income classification.

According to the 2015 ACS Census data, the AA consists of 701 census tracts, of which 41 (5.8 percent) are low-income, 174 (24.8 percent) are moderate-income, 248 (35.4 percent) are middle-income, 222 (31.7 percent) are upper-income and 16 (2.3 percent) have not been assigned an income classification. The percentage of households living below the poverty level was 14.4 percent. Based on 2020 Dunn & Bradstreet Data (D&B), there were 336,938 small businesses (those with gross annual revenues of \$1 million or less).

During the evaluation period, the U.S. Bureau of Labor Statistics reported the unemployment rate as of December 31, 2021, for the Tampa MSA was 3.0 percent, which compares favorably to the state and national rates of 3.6 percent and 3.9 percent, respectively. In contrast, due to the MSA being known as a favorable tourist designation with its nationally recognized pristine beaches, golfing and other attractions, the tourist industry was the most impacted sector to the economy during the COVID-19 pandemic. For the month of May 2020, the unemployment rate peaked at 13.1 percent with an average of 7.6 percent for the year.

According to Moody's Analytics, the Tampa MSA has rebounded quickly in comparison to other parts of the state in large part to the migration of new residents which has benefitted various industries in the AA, particularly those in consumer services, construction, and healthcare. Due to the increased trend in population, housing prices are reported as the strongest in over seven years. More relaxed COVID-19 restrictions have also benefitted the tourist industry in the MSA.

The Tampa MSA is home to several key and diverse industry sectors to include professional and business services, trade, transportation and utilities, education and health services and leisure and hospitality. Several of the major employers in the AA include BayCare Health Systems, MacDill Air Force Base, Hillsborough County School District, Publix Super Markets and HCA West Florida Division.

Affordable housing continues to be a challenge in the Tampa-St. Petersburg-Clearwater, FL MSA due to home prices and rents significantly increasing during the evaluation period driven by market trends, limited supply, and high demand. Based on a report by CoStar, within five years, median rents increased by nearly 40 percent in Tampa. Likewise, according to Realtor.com, during the evaluation period for Hillsborough County, median housing values in December 2020 was \$302 thousand, \$379,900 thousand in 2021 and \$419,900 in 2022 or increases in values by 25.8 percent and 39.0 percent, respectively.

## Scope of Evaluation in Florida

The bank operates five offices within one assessment area located in the State of Florida. The State of Florida was selected for a full-scope review.

#### LENDING TEST

The bank's performance under the Lending Test in Florida is rated Outstanding.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Tampa MSA is excellent.

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

The bank exhibits excellent geographic distribution of loans in the State.

#### Small Loans to Businesses

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The overall distribution of small business loans operating in low-income geographies is somewhat lower than the percentage of small businesses operating in low-income geographies in the AA and the overall aggregate distribution of small business loans reported by lenders required to report these types of loans (Large Bank CRA Data Collection and Reporting). However, the level of lending is reasonable as opportunities are limited with only 4.2 percent of all small businesses located in low-income census tracts in the AA. Further, as previously noted, competition is intense with 53 banks operating out of 606 offices in the AA all vying for these types of loans. The overall distribution of small business loans

operating in moderate-income geographies exceeds the percentage of small businesses operating in moderate-income geographies in the AA and exceeds the overall aggregate distribution of small business loans reported by lenders required to report these types of loans.

### Lending Gap Analysis

Loans made inside the AA are factored into the overall lending gap analysis of the geographic distribution of lending by income level of geography. Our review of the geographies that comprise the bank's AA, branch locations and distribution of lending for small business loans did not reveal any unexplained conspicuous gaps.

## Distribution of Loans by Income Level of the Borrower

The bank exhibits an excellent distribution of loans to businesses of different sizes, given the product lines offered by the bank.

#### Small Loans to Businesses

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The proportion of small business loans made in the assessment area was near to the proportion of small businesses operating in the assessment area (gross annual revenues of \$1 million or less) and exceeds the aggregate distribution of loans to small businesses operating in the AA reported by lenders subject to report these types of loans (Large Bank CRA Data Collection and Reporting).

Due to performance context factors discussed in the Description of Institution's Operations in Florida, the level of performance is excellent as small business lending is very competitive with the high volume of banks in the AA all vying for the same small business loans. We also considered FNBP's significant volume of small loans to businesses made through its participation in SBA CARES Act PPP program in 2020 and 2021. As previously noted, the bank made 322 PPP loans totaling \$20.1 million which provided much needed support for those local small businesses impacted by the pandemic.

#### **Responses to Complaints**

There were no CRA related performance complaints received by the OCC or the bank.

#### **COMMUNITY DEVELOPMENT**

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area. Performance related to community development activities had a positive effect on the bank's rating in the state.

#### **Number and Amount of Community Development Loans**

Refer to the Community Development Loans table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

| Community D        | Community Development Loans |              |           |                  |  |  |  |  |  |  |  |  |
|--------------------|-----------------------------|--------------|-----------|------------------|--|--|--|--|--|--|--|--|
|                    |                             | Total        |           |                  |  |  |  |  |  |  |  |  |
| Assessment<br>Area | #                           | % of Total # | \$(000's) | % of Total<br>\$ |  |  |  |  |  |  |  |  |
| Tampa              |                             |              |           |                  |  |  |  |  |  |  |  |  |
| MSA                | 1                           | 100,0        | 359       | 100.0            |  |  |  |  |  |  |  |  |

The Community Development Loans Table, shown above, sets forth the information and data used to evaluate the bank's level of CD lending.

During the evaluation period (January 1, 2019, through December 31, 2022), FNBP made one (1) CD loan totaling \$359 thousand to support a local nonprofit organization whose purpose is to provide affordable rental housing and assistance for low-income individuals residing in the assessment area. The loan proceeds were used to fund the acquisition of new corporate headquarters located in Dade City. Affordable housing has been identified as a crucial credit need in the AA. In addition, although not included in the table above, FNBP helped stabilize the local economy by making PPP loans to small businesses that allowed them to retain employees and maintain operations during COVID-19.

### **Number and Amount of Qualified Investments**

| Qualified Investr | Qualified Investments |           |        |                 |    |         |               |          |   |           |  |  |  |
|-------------------|-----------------------|-----------|--------|-----------------|----|---------|---------------|----------|---|-----------|--|--|--|
|                   | Pric                  | r Period* | (      | Current Total U |    |         |               |          |   |           |  |  |  |
| Assessment        | ment Period           |           | Period |                 |    |         | Commitments** |          |   |           |  |  |  |
| Area              | #                     | \$(000's) | #      | \$(000's)       | #  | % of    | \$(000's)     | % of     | # | \$(000's) |  |  |  |
|                   |                       |           |        |                 |    | Total # |               | Total \$ |   |           |  |  |  |
| Tampa MSA         | 0                     | 0.0       | 15     | 43              | 15 | 100.0   | 43            | 100.0    | 0 | 0.0       |  |  |  |

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

FNBP made 15 donations totaling \$43 thousand to seven nonprofit organizations within their AA. Three donations totaling \$30 thousand were made to a nonprofit community development organization whose

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

<sup>\* &#</sup>x27;Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

purpose is to provide affordable housing for purchase by low-and moderate-income individuals and families. The remaining 12 donations totaling \$13 thousand include support to a local nonprofit organization whose mission is to serve those low-income individuals with the most critical needs and supporting operating expenses of a battered women's shelter. During the evaluation period, double digit poverty levels were reported due to the high cost of living reported in the AA.

#### **Extent to Which the Bank Provides Community Development Services**

During the evaluation period, one member of senior management conducted an adequate number of CD services consistent with its capacity and expertise to conduct such activities. FNBP provided financial expertise for two events, totaling two (2) hours. The qualifying CD service activity performed during the pandemic involved partnering with a local business organization to provide much needed technical assistance to small businesses on SBA's PPP guidelines.

## 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 MSAs and non-MSAs that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

| Time Period Reviewed:                | 01/01/2019 to 12/31/2022   |   |  |  |  |  |  |  |  |
|--------------------------------------|----------------------------|---|--|--|--|--|--|--|--|
| Bank Products Reviewed:              | Small business.            |   |  |  |  |  |  |  |  |
|                                      | Community development loar | s, qualified investments, community development |  |  |  |  |  |  |  |
|                                      | services.                  |   |  |  |  |  |  |  |  |
| Affiliate(s)                         | Affiliate Relationship     | Products Reviewed                               |  |  |  |  |  |  |  |
| N/a                                  |                            |   |  |  |  |  |  |  |  |
|                                      |                            |   |  |  |  |  |  |  |  |
|                                      |                            |   |  |  |  |  |  |  |  |
|                                      |                            |   |  |  |  |  |  |  |  |
| List of Assessment Areas and Type of | of Examination             |   |  |  |  |  |  |  |  |
| Rating and Assessment Areas          | Type of Exam               | Other Information                               |  |  |  |  |  |  |  |
|                                      |                            |   |  |  |  |  |  |  |  |
| State:                               |                            |   |  |  |  |  |  |  |  |
| Florida-Tampa MSA                    | Full-Scope                 |   |  |  |  |  |  |  |  |
|                                      |                            |   |  |  |  |  |  |  |  |

# **Appendix B: Summary of MMSA and State Ratings**

| RATINGS: First National Bank of Pasco |                      |  |  |  |  |  |  |
|---------------------------------------|----------------------|--|--|--|--|--|--|
| Overall Bank:                         | Lending Test Rating: |  |  |  |  |  |  |
| Outstanding                           | Outstanding          |  |  |  |  |  |  |
| Florida:                              |                      |  |  |  |  |  |  |
| Outstanding                           | Outstanding          |  |  |  |  |  |  |

## **Appendix C: Definitions and Common Abbreviations**

The following terms and abbreviations are used in 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. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): 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; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, 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, 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-Scope 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), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

**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 state/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. The median is the point at which half of the families have income above, and half below, a range of incomes. 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, and half below, a range of incomes.

**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.

**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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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 1 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.

## **Appendix D: Tables of Performance Data**

## **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, 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 are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/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.

The following is a listing and brief description of the tables included in each set:

- **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 that were 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) in those geographies. Because aggregate 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.
- Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

| _                   | Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography |      |                         |                 |         |           |                 |                     |           |                 |                    |           | 2019-2021       |                    |           |                 |                                 |           |  |
|---------------------|--|------|-------------------------|-----------------|---------|-----------|-----------------|---------------------|-----------|-----------------|--------------------|-----------|-----------------|--------------------|-----------|-----------------|---------------------------------|-----------|--|
|                     |  | to S | Loans<br>mall<br>nesses | Low-Inc         | ome Tra | cts       | Mod             | erate-Ind<br>Tracts | come      |                 | e-Income<br>acts   | :         | Upper           | -Income            | Tracts    | Not             | Not Available- Income<br>Tracts |           |  |
| Assessment<br>Area: | #  | \$   | % of<br>Total           | %<br>Businesses |         | Aggregate | %<br>Businesses | %<br>Bank<br>Loans  | Aggregate | %<br>Businesses | %<br>Bank<br>Loans | Aggregate | %<br>Businesses | %<br>Bank<br>Loans | Aggregate | %<br>Businesses | %<br>Bank<br>Loans              | Aggregate |  |
| Tampa MSA           | 41   | 6,12 | 5100.0                  | 4.2             | 2.5     | 4.7       | 19.5            | 24.4                | 19.6      | 33.5            | 46.3               | 33.6      | 42.5            | 26.8               | 41.9      | 0.3             | 0.0                             | 0.2       |  |
| Source: 2020        | ource: 2020 D&B Data; 01/01/2019 - 12/31/2021 Random Sample of Bank Loans; 2021 CRA Aggregate Data.    |      |                         |                 |         |           |                 |                     |           |                 |                    |           |                 |                    |           |                 |                                 |           |  |

| Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues |    |               |                |                   |                 |                    |           |                 |                    |                        | 2019-<br>2021   |  |  |
|---|----|---------------|----------------|-------------------|-----------------|--------------------|-----------|-----------------|--------------------|------------------------|-----------------|--|--|
|   | Т  | otal Loans to | Small Business | ses               | Businesses      | with Revenue       | es <= 1MM | Businesses w    |                    | Businesses w<br>Not Av | ailable         |  |  |
| Assessment Area:  | #  | \$            | % of Total     | Overall<br>Market | %<br>Businesses | %<br>Bank<br>Loans | Aggregate | %<br>Businesses | %<br>Bank<br>Loans | %<br>Businesses        | % Bank<br>Loans |  |  |
| Tampa MSA   | 41 | 6,125         | 100.0          | 107,176           | 91.1            | 85.4               | 46.5      | 3.0             | 14.6               | 5.9                    | 0.0             |  |  |

Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Random Sample of

Bank Loans; 2021 CRA Aggregate Data

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.