



PUBLIC DISCLOSURE

July 6, 2020

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Eastern National Bank
Charter Number 15748

9700 South Dixie Highway, Suite 710
Miami, FL 33156

Office of the Comptroller of the Currency
9800 NW 41st Street, Suite 120
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.

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on Eastern National Bank's (ENB or bank) excellent distribution of loans in low- and moderate-income (LMI) geographies, a reasonable distribution of lending among businesses of different sizes, a substantial majority of loans originated in the assessment area (AA), and a more than reasonable loan to-deposit (LTD) ratio.
- The Community Development (CD) Test rating is based on the excellent responsiveness to CD needs in the AA through CD lending, qualified investments, and CD services.

Loan-to-Deposit Ratio

Considering ENB's size, financial condition, and credit needs of the AA, its LTD ratio is more than reasonable.

ENB's LTD ratio is more than reasonable given the performance context of the AA, including location, local competition, and the credit needs of the AA. This determination is based on the average LTD ratio of 96.0 percent from first quarter 2017 through fourth quarter 2019. The average LTD ratio for three banks in Miami-Dade County was 92.3 percent ranging from a high of 97.0 percent to a low of 88.2 percent. Peer banks used in the analysis reported total assets less than \$400 million and had a strategic focus on business lending.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its AA.

The bank originated all of the 20 loans sampled (100.0 percent) inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. The following table depicts ENB's lending activity in the AA during the evaluation period.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	20	100.0	0	0.0	20	6,264	100.0	0	0.0	6,264
Total	20	100.0	0	0.0	20	6,264	100.0	0	0.0	6,264

Description of Institution

ENB is an intrastate community bank headquartered in Miami, Florida. The bank is owned by Mercorp, N.V. (Mercorp), a Netherlands Antilles corporation. Mercorp is owned by Corpofin, C.A., a Venezuelan corporation that is under receivership by the Venezuelan government. ENB has three operating subsidiaries, formed for real estate holdings, and no affiliates. The subsidiary activity is not relevant to this evaluation and such activity does not affect the bank's ability to lend or invest in its community. ENB did not have any merger or acquisition activity during this evaluation period, nor did it open or close any branches since the last Community Reinvestment Act (CRA) evaluation completed on May 15, 2017.

The bank offers traditional loan and deposit products to consumers and businesses. Online banking and bill pay are available through the bank's website. During the evaluation period, ENB operated five branches in Miami-Dade County and all locations provide lobby services and automated teller machines (ATMs) with reasonable hours of operation. The main office is in a moderate-income geography. The branches are in upper income geographies, with one branch adjacent to two moderate-income geographies.

As of December 31, 2019, ENB reported total assets of \$341.6 million and tier 1 capital of \$30.3 million. The loan portfolio consisted of commercial loans at 61.4 percent, residential real estate loans at 33.7 percent, and consumer loans at less than one percent. Loans to foreign borrowers represent 4.1 percent of the total loan portfolio. ENB's primary business strategy focuses on commercial lending that includes trade finance. Total deposits were \$303.8 million of which approximately 23.3 percent (\$70.7 million) were from foreign depositors (primarily Venezuelan customers), which indicates that, in part, domestic loans are being funded by foreign deposits.

The bank faced challenges to its ability to help meet the credit needs of its AA as the bank was operating under a Consent Order (Order) and Individual Minimum Capital Requirements (IMCR) dated October 25, 2018 and November 1, 2018, respectively. The areas of concern outlined in the Order include requirements to reduce credit risk and maintain a system of internal controls to assure ongoing compliance with the Bank Secrecy Act (BSA). Despite efforts to achieve compliance with the Order and IMCR, ENB has managed to address the community credit needs in its AA. We considered these challenges when evaluating the bank's CRA performance. At its last CRA evaluation dated May 15, 2017, the bank was rated "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated the bank's CRA performance using Intermediate Small Bank performance criteria. Our evaluation covered the period from January 1, 2017 through December 31, 2019 focusing on business lending, which is ENB's primary business focus. Consistent with the ENB's primary lending focus, we sampled 20 loans made to small businesses during the evaluation period. The bank originates residential loans; however, residential lending is not a primary business line for ENB. The residential lending volumes during the evaluation period did not produce a meaningful analysis of home purchase, home refinance, and home improvement loans.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are not addressed in this evaluation. Bank qualifying activities will be considered in the subsequent evaluation.

Selection of Areas for Full-Scope Review

The bank has one AA which was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA) or combined statistical area (CSA) are combined and evaluated as a single AA. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based on the state ratings. The multistate metropolitan statistical area (MMSA) rating is based on performance of the bank's AA. Refer to the "Scope" section for details regarding how the area was weighted in arriving at the respective ratings.

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 has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The CRA performance rating was not lowered as a result of these findings. We considered the nature, extent, and strength of the evidence of the practices; the extent to which institution had policies and procedures in place to prevent the practices; and the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

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.

State Rating

State of Florida

CRA rating for the State of Florida¹: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans exhibits an excellent distribution of loans in both LMI geographies.
- The distribution of loans among businesses of different sizes is reasonable.
- A substantial majority of loan originations are within the bank's AA.
- The bank's LTD ratio was more than reasonable over the evaluation period.
- The responsiveness to CD needs is excellent considering the mix of CD lending, qualified investments, and services in the AA.

Description of Institution's Operations in Florida

Miami-Dade County was severely impacted by the housing crisis that began in 2006 and 2007 leading to the national recession that ended in 2009. Economic recovery has been sluggish through the evaluation period but improving in the past 10 years when considering the increased employment, the decrease in foreclosure filings, the increase in home sales, and other financial market indicators such as increased business profits. According to the Bureau of Labor Statistics, the MSA 33100 unemployment rate has decreased and is lower than the state of Florida and the national rate during the evaluation period.

Unemployment Rates			
	December 2017	December 2018	December 2019
United States	4.1	3.9	3.5
State of Florida	4.0	3.4	2.9
Miami-Fort Lauderdale-West Palm Beach, FL MSA 33100 (partial)	3.8	3.1	2.2

Given the economic improvements, the lack of affordable housing inventory and high housing costs are key challenges for LMI families to purchase homes. Many lower priced homes are quickly purchased for cash by investors, further limiting the number of affordable homes available to LMI buyers. The 2015

¹ [This rating reflects performance within the MMSA. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.]

American Community Survey (ACS) Census estimates the median value of owner-occupied housing units for MSA 33100 to be \$227,861, while the poverty level was 16.3 percent.

Based on the median family income at the MSA level, low-income, which is considered less than 50 percent of the median family income, would be an income of less than \$28,803 per year. Moderate income is less than 80 percent of the median income, or \$46,085, but not less than 50 percent of the median family income. According to the 2015 ACS Census, 19.1 percent of households spend more than 30 percent of their income for mortgage payments. Rents are also high in the AA with a median monthly gross rent of \$1,194. LMI renters, particularly low-income, also need rental subsidies to assist with rental payments. 19.1 percent of households spend more than 30 percent of their income for rental payments.

Competition for financial services within the AA is intense and includes several branches of national and regional banks, local community banks, credit unions, mortgage companies, and other nonbank financial service providers. As of June 30, 2019, the Federal Deposit Insurance Corporation (FDIC) reports that ENB is ranked 54th out of 88 financial institutions in the AA with \$327.9 million in total deposits, which represent less than one percent in deposit market share.

On September 10, 2017, the Federal Emergency Management Agency (FEMA) declared the State of Florida a designated major disaster area due to damages caused by Hurricane Irma. As a result of this designation, assistance is available for the residents and small businesses in the AA. The business sectors most impacted were food services, auto, retail, and travel industries. Food services and retail sectors were in the top five industries in 2017.

According to Dunn and Bradstreet, as of June 2019, there were 962,932 non-farm businesses in the AA, of which approximately 91.8 percent are considered small businesses. Major industries include healthcare, real estate development, trade business with Latin America, and tourism. The five largest employers in the AA include Publix Super Markets (39,240 employees), Baptist Health South Florida (23,000 employees), University of Miami (16,188 employees), Memorial Healthcare System (13,841 employees), and American Airlines (13,500 employees).

Investment opportunities are highly competitive with banks purchasing investments to support affordable housing for LMI individuals/geographies and small business lending. Many community banks tend to purchase mortgage backed securities with home mortgages to LMI borrowers or loans in LMI geographies, affordable housing multifamily properties, or SBA loan pools in their AAs. The opportunity to make donations/grants to qualifying organizations that have missions that support the CRA CD purpose are available. CD lending opportunities are available in the AA, including opportunities to partner with nonprofit organizations that have a CD mission or purpose. There are numerous nonprofit organizations located in the AA that provide various services to LMI people or small businesses, such as affordable housing opportunities, financial literacy training, and support for economic development activities.

Contacts with community organizations indicated affordable housing and small dollar loans to new business owners represent the largest credit needs in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: MSA 33100 Miami-Ft Lauderdale-West Palm Beach, FL (Partial)						
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	962,932	4.2	21.9	28.3	44.4	1.2
Farms by Geography	14,056	4.6	24.1	29.7	41.2	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 Miami-Ft Lauderdale-West Palm Beach FL		\$57,606	Median Housing Value			\$227,861
			Median Gross Rent			\$1,194
			Families Below Poverty Level			16.3%
<i>Source: 2015 ACS Census and 2019 D&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>						

Scope of Evaluation in Florida

The bank has one AA that is MD 33124 Miami-Miami Beach-Kendall, FL or Miami-Dade County. The AA is also part of MSA 33100 Miami-Fort Lauderdale-Palm Beach, FL. The AA received a full scope review. The geographic and borrower analyses are conducted at the MSA level rather than the MD level. Refer to the table in appendix A for a list of all AAs under review. ENB's strategic focus is business lending. Consistent with the bank's primary lending focus, small loans to businesses were sampled and analyzed.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

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

Based on a full-scope review, the bank's performance in the state of Florida is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state of Florida.

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 of loans to small businesses.

The distribution of loans to small businesses in both LMI geographies exceeds the aggregate lending distribution and the percentage of businesses in those geographies.

Lending Gap Analysis

The bank's small business loan originations in LMI geographies during the evaluation period did not reflect any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to businesses and farms 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 of loans to small businesses.

The distribution of loans to small businesses reflects reasonable distribution. The bank's loan originations to small businesses with revenues less than \$1 million is higher than the aggregate lending distribution, but lower than the percentage of small businesses.

Responses to Complaints

The bank did not receive any CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Florida is rated Outstanding.

Based on a full-scope review, the bank exhibits excellent responsiveness to community development needs in the state of Florida 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 AA.

Number and Amount of Community Development Loans

The Community Development Loan Table below sets forth 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.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
MSA 33100 (partial)	8	100.0	4,351	100.0

ENB originated an excellent level of community development loans. During the evaluation period, the bank originated eight loans totaling \$4.4 million that represented 14.4 percent of tier 1 capital. The level of qualified community development loans supported the biggest needs in the AA, which were affordable housing and supporting small business needs. Both affordable housing and small business needs are critical needs in the AA. In 2017, the bank originated a \$2.0 million loan to a small business that operates in a moderate-income geography and provides jobs to LMI individuals. Also, the bank originated a \$650 thousand loan to purchase a multi-family property in a moderate-income area.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
MSA 33100 (partial)	3	1,981	16	1,250	19	100.0	\$3,231	100.0	0.0	0.0

* Prior Period Investments means investments made in a previous evaluation 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.

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

During the evaluation period, the bank made 16 qualifying investments and donations totaling \$1.3 million. Investments included five certificates of deposit in minority owned depository institutions and 11 donations were made to six different organizations that support community services for LMI individuals. Three prior period investments, or \$1.9 million, are in Community Development Financial Institutions (CDFIs) that have invested in affordable housing projects in the AA.

Extent to Which the Bank Provides Community Development Services

Community Reinvestment Group, L.C.: The organization supports the development of affordable housing by providing financing to qualified Community Development Corporations and nonprofit groups. A bank employee provided technical expertise in the role as a director of the organization.

Learning for Success, Inc.: The organization manages the Kids and the Power of Work (KAPOW). The program introduces LMI elementary students to career awareness through professionally designed lessons taught by business volunteers in the classroom and visits to work sites. Sixty percent of the students are minorities who qualify for free or reduced lunch. Through a partnership with the Bank, students at a middle school in Miami-Dade County were exposed to career opportunities that helped them to connect what they are learning in school to their futures in the work place and life.

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 MSA(s) and non-MSA(s) 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:	01/01/2017 to 12/31/2019	
Bank Products Reviewed:	Small business Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Florida		
MSA 33100 Miami-Ft Lauderdale- West Palm Beach, FL (Partial)	Full-scope	Palm Beach County

Appendix B: Summary of MMSA and State Ratings

RATINGS Eastern National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Eastern National Bank	Outstanding	Outstanding	Outstanding
Florida	Outstanding	Outstanding	Outstanding

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

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 (MMSA), 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 30th 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 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 MMSA/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 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.
- Table R. 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.
- 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. The table also presents aggregate peer data for the years the data is available. Because aggregate 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 (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm 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 in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																2017 - 2019		
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	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
33100 Miami-Ft. Lauderdale-West Palm Beach, FL (Partial)	20	6,264	100.0	4.2	10.0	4.4	21.9	25.0	21.5	28.3	20.0	27.4	44.4	45.0	45.5	1.2	0.0	1.3
Total	20	6,264	100.0	4.2	10.0	4.4	21.9	25.0	21.5	28.3	20.0	27.4	44.4	45.0	45.5	1.2	0.0	1.3

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank 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 - 2019	
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		
33100 Miami-Ft. Lauderdale-West Palm Beach, FL	20	6,264	100.0	256,879	92.0	60.0	46.3	3.3	35.0	4.7	6.7		
Total	20	6,264	100.0	256,879	92.0	60.0	46.3	3.3	35.0	4.7	6.7		

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 Aggregate Data "--" data not available. Due to rounding, totals may not equal 100.0