



**PUBLIC DISCLOSURE**

June 1, 2020

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Terrabank, National Association  
Charter Number 20157

3191 Coral Way  
Miami, FL 33145

Office of the Comptroller of the Currency

Miami Field Office  
9850 N.W. 41 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**

Overall CRA Rating..... 1  
Description of Institution.....2  
Scope of the Evaluation.....2  
Discriminatory or Other Illegal Credit Practices Review.....3  
State Rating.....4  
    State of Florida.....4  
Community Development Test .....8  
Appendix A: Scope of Examination.....A-1  
Appendix B: Summary of MMSA and State Ratings.....B-1  
Appendix C: Definitions and Common Abbreviations.....C-1  
Appendix D: Tables of Performance Data.....D-1

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The lending test is rated: Satisfactory**

**The community development test is rated: Outstanding**

The major factors that support this rating include:

- The Lending Test rating is based on the excellent distribution of loans in low- and moderate-income (LMI) geographies, the reasonable distribution of lending among businesses of different sizes, a majority of loans purchased or originated in the assessment area (AA), and a 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 the Bank's size, financial condition, and credit needs of the AA, the Bank's loan-to-deposit ratio is reasonable.

The quarterly average LTD ratio for the Bank during the evaluation period was 73.2 percent. The LTD ratio is calculated on a bank-wide basis. The quarterly average LTD ratio for four banks similar in size was 88.9 percent ranging from a high of 97.0 percent to a low of 71.0 percent. Peer banks used in the analysis that operated during the evaluation period were located in Miami-Dade County and reported total assets less than \$500 million. The four peer banks and their quarterly average LTD ratios were as follows: Executive National Bank (91.5 percent), Sunstate Bank (71.0 percent), Eastern National Bank (96.0 percent), and Intercredit Bank, National Association (97.0 percent).

### Lending in Assessment Area

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

The Bank originated and purchased 56.7 percent of its total loans by number inside the Bank's AA during the evaluation period. This analysis is performed at the Bank, rather than the AA level. This conclusion is based on a random sample of 30 business loans that were originated during the evaluation period. The following table depicts the Bank's lending in the AA during the evaluation period. The 17 loans inside the AA were used in the geographic distribution analysis of the Bank's business loans. The level of lending in the AA depicts the increased competition the Bank has experienced in its AA with an increasing level of lending in the neighboring Broward County that is also in Metropolitan Statistical Area (MSA) 33100. Four additional business loans were added to the 17 loans, for a total of 21 loans in the sample, to produce a meaningful analysis for the geographic and borrower distributions of lending in the AA.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	17	56.7	13	43.3	30	8,447	66.0	4,355	34.0	12,802
Total	17	57.0	13	8.8	30	8,447	66.0	4,355	34.0	12,802

## Description of Institution

Terrabank is an intrastate community bank headquartered in Miami, Florida. The Bank has no holding company, operating subsidiaries, or affiliates. It operates three branches in Miami-Dade County. Two branches are located in the City of Miami and one is in the City of Hialeah. The Hialeah office is in a moderate-income geography and the Miami offices are in middle-income geographies. All branch locations have automated teller machines (ATMs).

The Bank offers a variety of deposit and loan products for businesses and individuals, as described in the CRA Public File. However, the Bank's primary lending strategy is originating loans to businesses, primarily for real estate purposes. The Bank is a Small Business Administration (SBA) Preferred Lender, the highest level of approval and status that a lender can hold in the SBA loan program, which allows the Bank to approve and fund SBA loans without direct loan approval by SBA.

As of December 31, 2019, total outstanding loans totaled \$449.8 million, or 66.3 percent of total assets. Approximately 66.0 percent were commercial real estate loans, 25.7 percent were residential real estate loans, 7.4 percent were commercial and industrial loans, and approximately 0.9 percent were other loans (including consumer loans). Tier 1 capital was \$39.3 million, and net income was \$2.9 million.

There are no legal, financial, or other factors that impede the Bank's ability to meet the credit needs in its AA. At its last CRA evaluation, dated April 24, 2017, the Bank was rated "Satisfactory".

The Bank has designated Miami-Dade County as its AA. This AA, which is the Metropolitan Division (MD) 33124, meets the requirements of the CRA regulation and does not arbitrarily exclude LMI geographies. MD 33124 is part of the MSA 33100 Miami-Fort Lauderdale-West Palm Beach that includes Miami-Dade, Broward, and Palm Beach counties.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated the CRA performance of Terrabank using Intermediate Small Bank performance criteria. Our evaluation covered the period from January 1, 2017 through December 31, 2019 for business loans, investments, and services. Because of the evaluation period for this evaluation, the significant economic impacts of the coronavirus pandemic are not addressed in the analysis. The Bank's strategic focus is

business lending. Consistent with the Bank's primary lending focus, loans to businesses were sampled. We did not include home mortgage lending in our analysis as it is not a primary product for the Bank and is mostly investor-owned properties.

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

In each state where the Bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. 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 a blend of the state ratings, and where applicable, multistate ratings. Terrabank has one AA and one primary product that received consideration. The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were 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 Bureau of Consumer Financial Protection, 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 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 Florida<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Outstanding

The major factors that support this rating include:

- The Bank's average quarterly loan-to-deposit ratio is reasonable for the evaluation period;
- A majority of the Bank's loan originations are within its AA;
- A reasonable distribution of loans to businesses of different sizes;
- An excellent geographic distribution of loans in the AA; and
- An excellent responsiveness to community development needs.

### Description of Institution's Operations in Florida

As discussed earlier, 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 that is comprised of Miami-Dade, Broward, and Palm Beach Counties. 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. The Bank's strategic focus is business lending. Consistent with the Bank's primary lending focus, small loans to businesses were sampled and analyzed. We did not include home mortgage lending in our analysis as it is not a primary product for the Bank and is mostly investor-owned properties.

There were Office of Management and Budget (OMB) boundary changes in 2017 that affected the 2019 year; however, these changes did not cause any boundary changes in MSA 33100. With no boundary changes, the three years of data were combined.

The Bank offers a variety of deposit and loan products to foreign and domestic businesses and individuals, as described in its CRA Public File. The Bank's primary business focus is commercial lending and the Bank is an SBA Preferred Lender as noted above. There are no affiliate or subsidiary activities that are relevant to this evaluation and such activity does not affect the Bank's ability to lend or invest in its community. The Bank's competitors include other local community banks in its AA,

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

some of the largest banks that have a nationwide footprint, credit unions, and nonbank financial entities that compete for residential and business loans.

We determined community credit needs in the full-scope AA by reviewing recent housing and demographic information, as well as CRA performance evaluations from other banks operating in the Bank's AA. Three community contacts in Miami made during the evaluation period indicated that the most critical needs were affordable housing, small business lending, and financial literacy. One organization supports affordable housing and helps LMI people achieve homeownership. Two of the the organizations help LMI entrepreneurs establish businesses. Community credit needs identified were affordable housing and loans for small businesses.

The following tables depict the demographic information for the AA.

### Description of Institution's Operations in Miami-Ft. Lauderdale-West Palm Beach Assessment Area (MSA 33100)

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: MSA 33100 Miami-Ft Lauderdale-West Palm Beach, FL</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census	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	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		\$64,653	Median Housing Value			\$227,861
			Median Gross Rent			\$1,194
			Families Below Poverty			16.3%

Source: 2015 ACS Census and 2019 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.

MSA 33100 was severely impacted by the housing crisis that began with declining housing prices in 2006 and 2007 leading to the national recession that ended in 2009. Recovery was slow, but for the

past 10 years, employment has improved, as well as home sales and business development. The poverty level for the AA is high with 16.3 percent of families living below the poverty level. Economic recovery has been sluggish during the evaluation period but improving 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	3.8	3.1	2.2

Despite the economic improvements, the high poverty level of 16.3 percent, the lack of affordable housing inventory, and high housing costs are key challenges for LMI families to purchase homes without additional support from loans subsidies. The additional costs of insurance and taxes further increase the cost of owning a home. Many lower priced homes are quickly purchased for cash by investors, further limiting the number of affordable homes available to LMI buyers. The 2015 American Community Survey (ACS) Census estimates the median value of owner-occupied housing units for MSA 33100 to be \$227,861.

Based on the median family income at the MSA level, low-income is considered less than 50 percent of the median family income, which would be an income of less than \$32,326 per year. Moderate income is less than 80 percent of the median income, or \$51,722, but not less than 50 percent of the median family income. 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.

Competition for financial services within the AA 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, 2019, the Federal Deposit Insurance Corporation (FDIC) reports that there are 60 banks in the AA operating 628 offices. Terrabank ranked 43rd with \$375.0 million in total deposits and a deposit market share of approximately 0.3 percent.

According to Dunn and Bradstreet, as of June 2019, there were 962,932 non-farm businesses in the AA, of which approximately 91.9 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).

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, partner with the nonprofit organizations with a community development mission or purpose in loan relationships to LMI individuals or small businesses, conduct literacy workshops, and more. Opportunities to purchase CRA qualified investments are highly competitive among the AA banks. These types of investments are created from affordable housing lending for LMI individuals, small business lending, as well as lending in low- and moderate-income geographies.

## **Scope of Evaluation in Florida**

As discussed earlier, 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 that is comprised of Miami-Dade, Broward, and Palm Beach counties. The analysis is conducted at the MSA level. 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. The Bank's strategic focus is business lending. Consistent with the Bank's primary lending focus, small loans to businesses were sampled and analyzed. We did not include home mortgage lending in our analysis as it is not a primary product for the Bank and is mostly investor-owned properties. There were no boundary changes in the MSA due to boundary changes effective in 2019, therefore, we combined the years 2017 through 2019.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA**

### **LENDING TEST**

The Bank's performance under the Lending Test in Florida is rated Satisfactory.

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

Based on a full-scope review, the Bank's lending performance in the state of Florida is reasonable.

### **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 geographic distribution of small loans to businesses reflects excellent distribution throughout the AA.

The Bank's small business lending for both LMI geographies exceeded the percent of businesses located in LMI geographies. For both LMI geographies, the Bank's lending exceeded the aggregate lending in LMI 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 of different sizes, given the product lines offered by the Bank. Distribution to individuals of different income levels was not applicable given home mortgages is not a primary product of the Bank and not its strategic focus.

### ***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 borrower distribution of small loans to businesses is reasonable in the AA.

The Bank's loans to businesses with revenues less than or equal to \$1 million was somewhat lower than the percent of businesses identified as having revenues less than or equal to \$1 million, but exceeded the aggregate lending for these businesses.

### **Responses to Complaints**

The Bank had no 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.

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

Based on a full scope review, the Bank exhibits excellent 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 AA.

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

The Community Development Loans Table, shown below, sets forth the information 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 Development Loans				
	Total			
Assessment Area	#	% of Total #	\$(000's)	% of Total \$
MSA 33100 (partial)	8	100	4,970	100

During the evaluation period, the Bank originated eight CD loans totaling \$5 million. These loans represented 12.7 percent of tier one capital. Qualified community development loans provide affordable housing, economic development, and include SBA loans supporting small business needs. Both affordable housing and small business needs are critical needs in the Bank's AA. Noteworthy examples include three loans to small businesses totaling \$1.9 million that provide employment to LMI individuals. Individuals employed by these borrowers include, cashiers, servers, bussers, cooks, dishwashers, and clerks. In addition, one of the borrowers offers office and mail support services to LMI individuals who do not have access to copiers, fax machines, etc.

### 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)	0	0	12	521	12	100	521	100	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. This table includes all CD investments, including prior period investments that remain outstanding as of the examination date.

During the evaluation period, the Bank had a total of 12 investments and grants totaling \$521,125 that qualified for CRA consideration, which represented 1.3 percent of tier one capital. The investments were part of a Fannie Mae Pool that financed apartments that were a Low-Income Housing Tax Credit (LIHTC) property for families located in Miami-Dade County. The grants were made to qualifying organizations that provided affordable housing for LMI people and an organization that provides services to LMI people.

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

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

The Bank participated in two community service activities during the evaluation period that involved three hours of service to organizations providing services to LMI people.

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	01/01/2017 to 12/31/2019	
<b>Bank Products Reviewed:</b>	Small Business Community Development Loans, Qualified Investments, Community Development 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>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Florida</b>		
MSA 33100 Miami-Ft Lauderdale- West Palm Beach, FL (partial)	Full-scope	Miami-Dade County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS      Terrabank Bank, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Terrabank Bank, NA.	Satisfactory	Outstanding	Satisfactory
MMSA or State:			
Florida	Satisfactory	Outstanding	Satisfactory

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

## Appendix C: Definitions and Common Abbreviations

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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

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### 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 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.

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2017-2019</b>		
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 Review</b>																					
MSA 33100-FL (partial)	21	8,726	100.0	256,879	4.2	14.3	4.4	21.9	33.3	21.5	28.3	14.3	27.4	44.4	38.1	45.5	1.2	0.0	1.3		
<b>Total</b>	21	8,726	100.0	256,879	4.2	14.3	4.4	21.9	33.3	21.5	28.3	14.3	27.4	44.4	38.1	45.5	1.2	0.0	1.3		

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

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2017-2019</b>	
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-FL (partial)	21	8,726	100.0	256,879	92.0	90.5	46.3	3.3	0.0	4.7	9.5		
<b>Total</b>	21	8,726	100.0	256,879	92.0	90.5	46.3	3.3	0.0	4.7	9.5		

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