



PUBLIC DISCLOSURE

June 8, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Winter Park National Bank
Charter Number 25142

201 N. New York Avenue, Suite 100
Winter Park, FL

Office of the Comptroller of the Currency

Tampa Field Office
4042 Park 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: This institution is rated **Satisfactory**.

The lending test is rated Satisfactory.

The Lending Test rating is based on Winter Park National Bank's (WPNB or "the bank") performance in the assessment area in the State of Florida.

The major factors that support this rating include:

- The bank's loan-to-deposit ratio is reasonable.
- The substantial majority of loans are made in the assessment area.
- The geographic distribution of loans demonstrates excellent distribution in the assessment area.
- Lending to businesses of different sizes demonstrates reasonable distribution in the assessment area.
- The bank exhibits adequate responsiveness to community development needs in the assessment area.

Loan-to-Deposit Ratio

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

The bank's average loan-to-deposit (LTD) ratio is reasonable, compared to peer group averages. WPNB's average LTD ratio for the evaluation period was 61.2 percent, which is lower than the peer banks' average LTD ratio of 78.0 percent for the same time period. The ratios were calculated and averaged for each calendar quarter from September 30, 2017 through September 30, 2019. While the bank's average ratio is lower than the peer average, it is noted that the bank has been in operation for 2.5 years, compared to some of the peer banks that have been in operation over 10 years. LTD ratios for a de novo bank are generally lower at inception as the bank begins to deploy deposits into lending. In addition, the bank's average ratio is within the range of peer ratios over the evaluation period, which ranged from 94.1 percent to 49.8 percent. The peer group used for this analysis included banks with total assets below \$500 million located in the Orlando-Kissimmee-Sanford, FL MSA and neighboring MSAs; there are 9 banks in this peer group.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its assessment area (AA). WPNB originated 100 percent of sampled loans inside the bank's 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		
	#	%	#	%		\$	%	\$	%	
Business Loans	30	100.0	0	0.0	30	26,492	100.0	0	100.0	26,492
Total	30	100.0	0	0.0	30	26,492	100.0	0	100.0	26,492

Our Lending Test analysis was based on a sample of the bank's primary loan product, as discussed in the Scope of the Evaluation section. Our conclusion is consistent with WPNB's data analysis of the full

business loan portfolio which shows similar performance for the number of loans and dollar volume of loans originated inside the AA during the evaluation period.

Description of Institution

Winter Park National Bank (WPNB) is a single-state bank headquartered in Winter Park, Florida. The bank was established on August 1, 2017. WPNB has one branch location in Winter Park, FL. The branch does not have an automated teller machine, but does have night depository services and a drive-up teller facility. Deposits are primarily sourced from the local community. The bank has one assessment area and one rating area for this evaluation.

WPNB has grown from \$92.1 million in total assets at year-end 2017, with five months of operation, to total assets of \$351.9 million as of December 31, 2019. Net loans comprise 56 percent of total assets, or \$197.6 million. Tier one capital totals \$43.3 million. There are no financial or legal impediments that would prevent the bank from meeting the credit needs of the community it serves. This is WPNB's first CRA evaluation.

WPNB offers a variety of lending products, but the primary product is loans to businesses. During the evaluation period, business loans comprised 58.2 percent of the total number and 55.7 percent of the total dollar volume of the bank's loan originations or purchases.

Loan Type	Number	% of Number	Dollar Volume (000)	% of Dollar Volume
Business Loans	224	58.2	174,062	55.7
Construction & Development Loans	32	8.3	61,893	19.8
Residential Loans	114	29.6	73,021	23.4
Consumer Loans	14	3.6	1,396	0.5
Other Loans	<u>1</u>	<u>0.3</u>	<u>2,000</u>	<u>0.6</u>
Total Loans	385	100.0	312,372	100.0

Source: Bank Data

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period includes all reported activity from August 1, 2017 to December 31, 2019. The evaluation considered small business lending activity during this period. We also considered the bank's community development loans, investments and services during the evaluation period.

Selection of Areas for Full-Scope Review

WPNB has one assessment area (AA), which was evaluated as a full-scope 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

WPNB has one AA; therefore, the overall rating is based on the lending performance in this AA. Business loans represented the greater portion of the bank's lending during the evaluation period. Therefore, business loan performance is the basis for the overall rating conclusions.

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 Florida¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of loans demonstrates excellent distribution in the assessment area.
- Lending to businesses of different sizes demonstrates reasonable distribution in the assessment area.

Description of Institution's Operations in Florida

WPNB has one branch, located in Winter Park, FL. The branch does not have an automated teller machine, but does have night depository services and a drive-up teller facility. The bank offers a variety of lending products, but the primary focus is lending to businesses.

WPNB's AA is a portion of the Orlando-Kissimmee-Sanford Metropolitan Statistical Area ("Orlando MSA"). The AA is comprised of Osceola, Orange and Seminole counties. The bank's AA is reasonable given the size of the bank and its lending capacity. The AA meets the legal requirements of the CRA and does not arbitrarily exclude any LMI geographies. Demographic data on WPNB's AA is presented in Table A below.

The bank's total deposits are \$306 million as of year-end 2019. WPNB has 0.63 percent of the total market share of deposits in the AA and ranks 20 out of 41 banks. Banking competition is high and includes community banks, regional banks, large national banks and credit unions. The aforementioned 41 banks have 439 branches with \$47.2 billion in deposits in the AA. The top 5 banks in the AA hold 69 percent of total deposits in the AA—Bank of America, N.A., SunTrust Bank, Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A. and Regions Bank.²

Community Contacts

During this evaluation, we contacted a community organization in the AA and incorporated information from other community contacts conducted during the evaluation period. The community contacts provided an assessment of the community's needs, opportunities in which financial institutions may participate in meeting those needs, and information on the perception of financial institutions involvement in the community. Community credit needs noted by these organizations related to small business include flexible underwriting standards for small business owners and technical assistance to small business owners, including financial education—contacts noted that credit scores and lack of equity are the biggest impediments to small business owner's access to capital. In addition contacts identified support—through loans, investments and technical assistance—to community organizations

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

² FDIC Deposit Market Share Report; deposits as of: June 30, 2019

that assist small businesses and can work directly with small businesses to provide technical assistance and micro-loan resources.

WPNB Assessment Area

Table A (2) – Demographic Information of the Assessment Area						
Assessment Area: Winter Park NB AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	334	4.2	29.3	32.9	32.9	0.6
Population by Geography	1,967,255	2.9	29.0	34.3	33.7	0.0
Housing Units by Geography	818,072	3.1	28.6	35.6	32.6	0.0
Owner-Occupied Units by Geography	398,004	1.2	21.3	35.4	42.1	0.0
Occupied Rental Units by Geography	280,913	5.7	38.6	33.4	22.3	0.0
Vacant Units by Geography	139,155	3.5	29.7	40.3	26.5	0.0
Businesses by Geography	277,928	1.7	25.2	32.9	40.2	0.0
Farms by Geography	5,742	1.4	23.7	37.1	37.6	0.2
Family Distribution by Income Level	449,919	21.9	17.6	19.0	41.6	0.0
Household Distribution by Income Level	678,917	22.9	16.7	18.2	42.1	0.0
Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA		\$57,304	Median Housing Value			\$170,085
			Median Gross Rent			\$1,066
			Families Below Poverty Level			12.8%
<p><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></p>						

Scope of Evaluation in Florida

WPNB has a single branch and one AA. The scope of the evaluation in Florida is discussed on page 4 of this Evaluation.

LENDING TEST

The Lending Test in Florida is rated: Satisfactory.

Based on a full-scope and review, the bank's lending performance in the State of Florida reasonable.

In our evaluation of the bank's lending, consideration was given to context factors that impacted the bank's performance. WPNB is a small bank in total dollars of assets, loans and deposits, even when compared to peer banks in the AA and in the broader MSA. The level of banking competition in the AA also presented challenges to lend. There are also context factors related to small business lending that were noted by community contacts and discussed in the performance conclusions below.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent distribution of small business loans in the AA.

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.

Small 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.

WPNB had no small loans to businesses in in low-income census tracts. Small loans to businesses in moderate-income census tracts exceeded the business demographic comparator as well as exceeding the percent of small loans to businesses by other lenders. WPNB's data analysis of the full business loan portfolio shows performance that meets or exceeds the demographic comparator and aggregate lender level for small loans to businesses in LMI geographies during the evaluation period. In evaluating WPNB's small loans to businesses, consideration was given WPNB's size, lending capacity and competition in the AA from banks and other nonbank lenders for small loans to business. Furthermore, in the AA, businesses are geographically concentrated along major corridors; and low-income geographies represent less than 5 percent of all geographies in the three-county AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to businesses of different sizes.

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.

Small 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 businesses are those with annual *revenues* of \$1 million or less.

WPNB's small loans to small businesses was lower than the overall level of small businesses in the AA; however, the bank's percent of lending to small businesses was adequate compared to the level of small business loans made by other lenders in the AA. WPNB's data analysis of the full business loan portfolio shows performance that is consistent with our sample, for the distribution of loans to small businesses in the AA during the evaluation period. In evaluating WPNB's small loans to businesses, consideration was given WPNB's size, lending capacity and competition in the AA from banks and other nonbank lenders, particularly the number of large bank competitors in the AA.

Responses to Complaints

No complaints related to the bank's CRA performance were received during the evaluation period.

COMMUNITY DEVELOPMENT

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the AA 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. Performance related to community development activities had a neutral effect on the bank's rating in the AA.

Number and Amount of Community Development Loans

Refer to the Community Development Loan 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.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Winter Park NB AA	1	100.0	150	100.0

The bank originated a CD loan to an organization that provides transitional housing for LMI individuals who are leaving substance abuse treatment facilities.

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)
Winter Park NB AA	0	0	10	11	10	100	11	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 bank provided grants to organizations that support affordable housing residents, homeless services and LMI youth programs.

Extent to Which the Bank Provides Community Development Services

Two senior bank managers provided over 300 hours of CD services that supported LMI children's services and technical assistance for nonprofit fundraising activities.

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

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:	August 1, 2017 to December 31, 2019	
Bank Products Reviewed:	Business loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Florida		
portion of the Orlando-Kissimmee-Sanford, Florida, Metropolitan Statistical Area (MSA) #36740	Full-scope	Orange County Osceola County Seminole County <i>(excludes Lake County)</i>

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 (for HMDA and Small Business) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the 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 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 (*not applicable*)** - 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 (*not applicable*)** - 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 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	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Winter Park NB AA	30	26,492	100	59,287	1.7	0	1.5	25.2	46.7	24.1	32.9	20	32.4	40.2	33.3	41.9	0.0	0.0	0
Total	30	26,492	100	59,287	1.7	0	1.5	25.2	46.7	24.1	32.9	20	32.4	40.2	33.3	41.9	0.0	0.0	0

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

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
Winter Park NB AA	30	26,492	100.0	59,287	91.0	33.3	47.4	3.0	66.7	6.0	91.0
Total	30	26,492	100.0	59,287	91.0	33.3	47.4	3.0	66.7	6.0	91.0

*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%*