



**PUBLIC DISCLOSURE**

September 30, 2019

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

Intercredit Bank, National Association  
Charter Number 18283

4725 Southwest 8th Street  
Miami, FL 33134

Office of the Comptroller of the Currency

Miami Field Office  
9850 NW 41st Street, Suite 260  
Miami, FL 33178

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

## Table of Contents

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
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 reasonable distribution of loans in low- and moderate-income (LMI) geographies, reasonable distribution of lending among businesses of different sizes, substantial majority of loans purchased or originated in the assessment area (AA), and 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 the Bank's size, financial condition, and credit needs of the AA, the Bank's LTD ratio is more than reasonable. The LTD ratio is calculated on a bank-wide basis. The average quarterly LTD ratio for the Bank during the evaluation period was 96.87 percent. The quarterly average LTD ratio for four banks similar in size was 84.10 percent ranging from a high of 98.14 percent to a low of 73.50 percent. Peer banks used in the analysis reported total assets less than \$500 million and had a strategic focus on business lending. The banks included four banks in Miami-Dade County: Executive National Bank, Continental National Bank, Eastern National Bank, and Terrabank National Association.

### Lending in Assessment Area

A substantial majority of the Bank's loans are inside its AA. The Bank originated or purchased 91.2 percent of loans sampled 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 34 business loans that were originated during the evaluation period. The following table depicts the Bank's lending in the AA during the evaluation period.

<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	31	91.2	3	8.8	34	34,838	82.6	7,326	17.4	42,164
Total	31	91.2	3	8.8	34	34,838	82.6	7,326	17.4	42,164

## Description of Institution

Intercredit Bank, N.A. (ICBNA) is an intrastate community bank chartered in 1984. The Bank is privately owned by Intercredit Bank Trust. As of December 31, 2018, the Bank had total assets of \$363.8 million, total loans of \$288.9 million, total deposits of \$283.5 million, and tier one capital of \$38.6 million. Total loans represent approximately 79.4 percent of assets. The Bank's loan portfolio is comprised of commercial real estate loans (48.2 percent), commercial and industrial loans (11.4 percent), residential mortgage loans (36.7 percent), and consumer loans (3.6 percent). Multifamily housing represents 6.8 percent of total loans. The Bank offers a wide variety of deposit and loan products to foreign and domestic businesses and individuals as described in the Bank's CRA Public File. The Bank's primary business strategy focuses on commercial lending, and the Bank continues to be a certified Small Business Administration (SBA) lender.

During the evaluation period, Intercredit operated four banking offices within Miami-Dade County that include automated teller machines (ATMs). Three branches were in upper-income geographies and one was in a middle-income geography. Three of the branches are adjacent to moderate-income geographies.

There are no legal or other factors that impede the Bank's ability to help meet the credit needs in its AA. The Bank's rating at its preceding CRA evaluation, dated October 17, 2016, was "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 Metropolitan Statistical Area (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 ICBNA using Intermediate Small Bank performance criteria. Our evaluation covered the period from May 2, 2016 through December 31, 2018. We focused on lending activity from July 1, 2016, through December 31, 2018, for analysis purposes. 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 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. ICBNA 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 geographic distribution of loans exhibits a reasonable distribution of loans in 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 loan-to-deposit ratio was more than reasonable over the evaluation period, and
- The responsiveness to CD needs is excellent considering the mix of CD lending, qualified investments, and CD services in the AA.

### Description of Institution's Operations in Florida

The Bank operates in one AA in the state of Florida as described in the Description of the Institution section of this performance evaluation. ICBNA operates four branches in Miami-Dade County in the cities of Coral Gables (South Miami Branch) and Miami (Main Office, Bird Road Branch, and Doral Branch).

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 a certified SBA lender. 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 and some of the largest banks that have a nationwide footprint as well as 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 AAs. 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. Two of the contacts were nonprofit organizations, and the third was from a local bank forum that involved nine local community groups.

The following tables depict the demographic information for the 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.

**MD 33124- Miami-Dade County**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: MD 33124- Miami-Dade County 2015 Census</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 Tracts)	519	5.8	27.8	29.0	34.1	3.5
Population by Geography	2,639,042	5.5	29.7	30.9	33.2	0.7
Housing Units by Geography	998,833	5.3	27.5	29.3	37.2	0.6
Owner-Occupied Units by Geography	452,826	2.0	21.4	31.9	44.4	0.2
Occupied Rental Units by Geography	389,327	9.6	37.8	28.2	23.5	0.8
Vacant Units by Geography	156,680	4.3	19.4	24.6	50.4	1.3
Businesses by Geography	346,484	3.1	21.3	25.8	47.5	2.4
Farms by Geography	4,202	3.4	21.9	26.6	47.3	0.8
Family Distribution by Income Level	572,388	24.0	16.6	16.9	42.5	0.0
Household Distribution by Income Level	842,153	26.1	15.1	15.9	42.9	0.0
Median Family Income MD - 33124 Miami-Miami Beach-Kendall, FL MD		\$49,264	Median Housing Value			\$244,010
			Median Gross Rent			\$1,155
			Families Below Poverty Level			16.9%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

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. Recovery was slow, but for the past 10 years, employment has improved, as well as home sales. The poverty level for the AA is high with 16.9 percent of families living below the poverty level. According to the Bureau of Labor Statistics, the State of Florida and Miami-Dade County unemployment rates during the evaluation period have decreased as illustrated in the table below. Miami-Dade County's unemployment rate continued to be higher than the state of Florida's rate and generally higher than the national rate except for December 2018.

<b>Unemployment Rates</b>			
	<b>December 2016</b>	<b>December 2017</b>	<b>December 2018</b>
<b>United States</b>	4.5	3.9	3.7
<b>State of Florida</b>	4.5	3.8	3.3
<b>Miami-Dade County</b>	4.9	4.3	3.5

United States Bureau of Labor Statistics

Given the economic improvements, housing and rental prices have increased. The 2015 American Community Survey (ACS) Census estimates the median value of owner-occupied housing units in Miami-Dade County to be \$244,010. Rents are also high in the AA with a median monthly gross rent of \$1,155.

The Federal Financial Institutions Examination Council (FFIEC) estimated a median family income for MSA 33100 of \$52,300 based on the ACS for the 2015 Census update. At the MD level, the median family income is less at \$49,264. Considering the median family income and the high poverty level in the AA, LMI families have difficulty affording mortgage payments without subsidies given the high housing costs and added costs of insurance and taxes. 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 \$26,150 per year. Moderate income is less than 80 percent of the median income, or \$41,840, but not less than 50 percent of the median family income. LMI renters, particularly low-income, also need rental subsidies to assist with rental payments. According to the 2015 ACS Census, 18.39 percent of households spend more than 30 percent of their income for mortgage payments, and 24.09 percent of households spend more than 30 percent of their income for rental payments.

According to Dunn and Bradstreet, as of June 2018, there were 346,484 non-farm businesses in the AA, of which approximately 90.6 percent are considered small business. Small businesses are defined as having revenues of \$1 million or less. The majority (73.3 percent) of all non-farm businesses are concentrated in the county's middle- and upper-income geographies. 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 (38,241 employees), Baptist Health South Florida (16,191 employees), University of Miami (14,664 employees), Tenet Health Corporation (12,170 employees), and Jackson Health System of Miami (11,410 employees).

The banking industry in the AA is very competitive for loans, deposits, and investment, as well as CRA CD opportunities. There are several branches of nationwide and regional banks, local community banks, credit unions, and other nonbank financial service providers. There was heightened competition for loans since numerous mortgage companies operate in the AA and national credit card lenders compete for small business loans. According to Dun and Bradstreet Reports for 2017 (the latest data available), the top five small business lenders in the AA hold a large lender market share of 78.6 percent and are credit card banks with a nationwide presence and an average loan size of \$12,000. These lenders are American Express, Citibank, National Association (NA); Bank of America, NA; Chase Bank, NA; and Wells Fargo Bank, NA.

A review of June 30, 2018 Deposit Market Share data from the Federal Deposit Insurance Corporation (FDIC) that is relevant to the evaluation period indicates the five largest deposit market share institutions (Bank of America, NA; Wells Fargo, NA; Citibank, NA; J.P. Morgan Chase, NA; and City National Bank of Florida) operating in the AA held approximately 52.5 percent of the AA deposits.

Four of the top five banks have a nationwide presence and one is a local community bank. These five institutions had 268 offices within the AA. There was a total of 60 banks in the AA operating through 628 offices. ICBNA ranks 47th in deposit market share at approximately 0.2 percent.

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 people 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.

## **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 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.

For the Lending Test, separate analyses were conducted for the year 2016. The years 2017 and 2018 were combined and analyzed separately due to the 2015 ACS US Census that applies to 2017 and 2018. The 2010 US Census applies to 2016. Comparative data was different for each census change, as well as income levels for some census tracts (CTs) also referred to as geographies.

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

### **LENDING TEST**

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

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 an 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.

For 2016, the analysis was not meaningful given only 11 originated business loans for the partial year during the evaluation period. However, the Bank did originate one business loan in a low-income geography and three business loans in moderate-income geographies. Performance is weighted to lending activity in 2017 and 2018.

For 2017-2018, 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.

#### ***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.

For 2016, the analysis was not meaningful given only 11 originated business loans for the partial year during the evaluation period. However, the Bank did originate 10 loans made to businesses with revenues less than or equal to \$1 million. Performance is weighted to lending activity in 2017 and 2018.

For 2017-2018, the Bank's loans to businesses with revenues less than or equal to \$1 million was lower than the percent of businesses identified as having revenues less than or equal to \$1 million but was near to the aggregate lending for these 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 Miami-Dade 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.

### Number and Amount of Community Development Loans

Refer to the Lending Activity table below for the facts and data used to evaluate the Bank's level of CD lending. This 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)	6	100	6,606	100

During the evaluation period, the Bank originated six loans totaling \$6.6 million. Qualified community development loans provide affordable housing and 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.

### 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	15	251	15	100	251	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 made 15 qualifying investments and donations totaling \$251,000. Investments included a certificate of deposit placed in a local minority-owned financial institution totaling \$241,000.

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

**Florida Export Finance Corporation (FEFC)** - A not-for-profit organization established by the state of Florida that offers financial, technical, and consulting assistance to small businesses involved in the export of goods and services to foreign markets. A Bank officer serves on the board of directors of this organization.

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

**Dade Partners Program** - The program sponsored by the Miami-Dade County School System seeks businesses and not-for-profit organizations to provide schools a multitude of resources. Partnership activities include sponsoring free or reduced lunch savings programs to LMI individuals. A Bank officer serves on the advisory board of this organization.

**Florida International University's Steven J. Green School of International & Public Affairs** - The school supports a variety of community development programs such as offering scholarships to students who demonstrate financial need. A Bank officer serves on the advisory board of this organization.

**“My Money Program”** - The Bank participates in this program created by the state of Florida under the Department of Financial Services. It provides educational lessons for individuals with developmental disabilities and resources for their family members and caregivers. The program allows individuals to learn and practice financial skills at their own pace, using interactive games, activities and educational videos. Lessons focus on money basics, banks and credit unions, accounts, budgeting, government benefit programs, and ways to find and keep employment.

## 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>	05/02/2016 to 12/31/2018	
<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      Intercredit Bank, National Association			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Intercredit 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 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.

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2016</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)	11	15,244	100.0	242,848	3.4	9.1	3.2	21.8	27.3	20.5	30.3	9.1	28.5	43.7	54.5	46.8	0.9	0.0	0.9	
<b>Total</b>	11	15,244	100.0	242,848	3.4	9.1	<b>3.2</b>	21.8	27.3	20.5	30.3	9.1	28.5	43.7	54.5	46.8	0.9	0.0	0.9	

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2017-2018</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)	20	19,594	100.0	226,331	4.3	10.0	4.6	21.9	35.0	21.4	28.2	25.0	27.35	44.4	30.0	45.5	1.2	0.0	1.2	
<b>Total</b>	20	19,594	100.0	226,331	4.3	10.0	4.6	21.9	55.0	21.4	28.2	10.0	27.3	44.4	25.0	45.5	1.2	0.0	1.2	

*Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 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>2016</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)	11	15,244	100.0	242,848	90.7	90.9	48.5	3.8	9.1	5.5	5.0	
<b>Total</b>	11	15,244	100.0	242,848	90.7	90.9	48.5	3.8	9.1	5.5	5.0	
<i>Source: 2016 D&amp;B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2017-2018</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)	20	19,594	100.0	226,331	90.6	45.0	52.9	4.3	40.0	5.1	15.0	
<b>Total</b>	20	19,594	100.0	226,331	90.6	45.0	52.9	4.3	40.0	5.1	15.0	
<i>Source: 2018 D&amp;B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0</i>												