



## **PUBLIC DISCLOSURE**

April 15, 2019

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First National Bank of Pasco  
Charter Number 20976

13315 US Highway 301 South  
Dade City, FL 33525

Office of the Comptroller of the Currency

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

**This institution is rated: Satisfactory.**  
**The Lending Test is rated: Satisfactory.**

Our conclusions are based on the following:

- The bank's level of lending, as reflected in the quarterly average net loan-to-deposit ratio is reasonable given the bank's size and performance context factors.
- A majority of the bank's primary loan product, business loans, originated over the evaluation period is within its assessment area.
- Lending to businesses of different sizes reflects reasonable distribution.
- Geographic distribution of the bank's business loan originations and purchases across geographies of different income levels reflects excellent distribution.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**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 MA/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. 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 it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**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.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

**Rated Area:** A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

## Description of Institution

First National Bank of Pasco (FNB of Pasco) was chartered in 1986 and is headquartered in Dade City, Florida, and operates only in the state of Florida. The bank is wholly owned by Florida Bancshares, Inc., a one-bank holding company also headquartered in Dade City, FL. The bank operates four full-service branches; the main office in Dade City, FL, two in Zephyrhills, FL, and one in Lutz, FL. All offices are located in Pasco County. The newest branch is the office in Lutz, FL, which opened in 2018. Additionally, the bank has four business lenders working remotely throughout the assessment area.

As of December 31, 2018, FNB of Pasco had total assets of \$174.4 million, with total loans of \$106.5 million. Total loans represent 61.1 percent of total assets. In 2016, the bank shifted its strategy away from retail lending and instead focused on growing its commercial loan portfolio. As of December 31, 2018, commercial loans totaled \$70.7 million, or 66.4 percent of the loan portfolio. Residential real estate and other consumer loans make up the majority of the remaining portion of the loan portfolio at \$35.3 million, or 33.1 percent of the loan portfolio.

While the bank maintains a conservative lending strategy with a primary focus on establishing long lasting customer relationships and community engagement, consumer lending has diminished in terms of percentage of the total portfolio. While all types of consumer products continue to be made available to the public, growth has been in business lending. The bank does provide consumers access to home mortgage financing through a third-party relationship with a large national home mortgage lender.

FNB of Pasco offers full service banking, including automated teller machine (ATM) access at each office location, Pasco Regional Medical Center and Saint Leo University. The bank also offers drive-up facilities and online banking. Deposit services include a variety of personal and business checking and savings accounts, certificates of deposit, and individual retirement accounts. The bank's alternative delivery systems include online banking with bill-pay, 24-hour telephone banking, and mobile banking, which provide real-time access to accounts using a smart phone or other similar devices.

There are no financial or legal obstacles affecting FNB of Pasco's ability to meet its community credit needs. The last Community Reinvestment Act (CRA) evaluation of FNB of Pasco was completed in January 2014 when the bank received a "Satisfactory" rating. The focus of that evaluation was on residential real estate loans, the primary lending product for the bank at that time.

FNB of Pasco's assessment area is comprised of three counties – Hillsborough, Pinellas and Pasco Counties. These counties are in the Tampa-St. Petersburg-Clearwater MSA #45300 (Tampa MSA). The bank has delineated all census tracts within the three counties as its assessment area. The assessment area meets the

requirements of CRA and does not arbitrarily exclude low- and moderate-income geographies.

Banking is competitive in the assessment area. Based on FDIC's December 31, 2018 deposit market share report for the three counties, FNB of Pasco ranks 34th out of 53 financial institutions with 0.18 percent market share.

## **Scope of the Evaluation**

This Performance Evaluation (PE) assesses FNB of Pasco's record of meeting the credit needs of the community in which it operates. We evaluated the bank using the Community Reinvestment Act Small Bank examination procedures, which includes a lending test. The lending test evaluates the bank's record of meeting the credit needs of its assessment area through its lending activities.

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

The evaluation period is January 1, 2016, through December 31, 2018. Due to the 2015 census changes effective 2017, the bank's lending performance for 2016 was evaluated separately, and 2017 and 2018 was evaluated on a combined basis.

As previously noted, the bank's primary loan product during the evaluation period was business lending which reflects the lending strategy for the past three years. During the evaluation, the bank provided a report with data of all loan originations and purchases for the period of January 1, 2016, to December 31, 2018. Based on this report, there were a total of 274 loans made or purchased with the majority comprised of business loans (74.1 percent or 203 in number). Due to the volume of business lending, our evaluation of the bank's lending performance focused on business lending rather than home mortgage and consumer lending. Further, due to the volume of business loans originated and purchased in 2017 and 2018, our evaluation will be weighted more on this time period rather than 2016. It is noted the aggregate lending as shown in the tables for small business lending is skewed as the data is run on those banks subject to Large Bank CRA Reporting Requirements. Due to the bank's asset size, the bank is not required to complete and file this report, and therefore, is not included in the aggregate reports for the bank's assessment area.

Refer to appendix B for information on the community credit needs in the bank's assessment area.

### **Data Integrity**

Loan data detailed on the business loan origination report was tested for accuracy by sampling 118 out of the 203 business loans originated and purchased during the evaluation period. For 2016, we sampled 42 business loans, and for the combined years of 2017 and 2018, we sampled 76 business loans. Based on the results of our

sample, we identified the gross annual revenue was not consistently captured and reported accurately. As a result of our finding, staff will be trained on capturing gross annual revenue going forward. As such, we used the data collected from our sample for our analysis and overall evaluation of the bank's lending performance.

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

The Tampa-St. Petersburg-Clearwater MSA (Hillsborough, Pasco, and Pinellas Counties Assessment Area) received the full-scope review.

### **Ratings**

The bank's overall rating is based on the MSA that received the full-scope review.

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

Pursuant to 12 C.F.R. §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 assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

# Conclusions with Respect to Performance Tests

## LENDING TEST

Based on the data in the Tables, the bank’s size and performance context considerations, the bank meets the standard for satisfactory performance under the lending test.

### Loan-to-Deposit Ratio

The bank’s level of lending, as reflected in the quarterly average net LTD ratio, is reasonable given the bank’s size and performance context factors. The bank’s quarterly average net LTD ratio since the preceding CRA evaluation (22 quarters starting September 30, 2013 and ending December 31, 2018) is 59.77 percent, ranging from a low of 51.91 percent in the first quarter of 2014 to a high 69.11 percent in the fourth quarter of 2018. FNB of Pasco’s quarterly average LTD ratio is below the 82.59 percent quarterly average LTD ratio of five similarly situated banks operating within the same assessment area. The quarterly LTD ratio for the five community banks ranged from a low of 54.7 percent to a high of 99.4 percent. The community banks selected have total assets ranging from \$143 million to \$402 million. All community banks in the peer group offer similar lending and deposit products. As discussed in the Description of the Institution section, FNB Pasco operates within a MSA where banking is competitive. Throughout the MSA, many national and regional banks maintain branch offices. Also, during this evaluation time period, FNB Pasco’s loan portfolio contracted while it changed its business strategy from retail lending to business lending. In total, FNB Pasco grew its loan portfolio \$26,686 thousand during this time period. This demonstrates the change in net LTD ratio over the time period.

### Lending in Assessment Area

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		
	#	%	#	%	\$	%	\$	%		
<b>Business Loans</b>	<b>94</b>	<b>79.66</b>	<b>24</b>	<b>20.34</b>	<b>118</b>	<b>43,354</b>	<b>82.69</b>	<b>9,076</b>	<b>17.31</b>	<b>52,430</b>

*Source: Evaluation Period: 1/1/2016 - 12/31/2018 sample from the bank’s loan origination report.*

A majority of the bank’s primary loan product, business loans, originated and purchased over the evaluation period was within its assessment area. This conclusion is based on an analysis of a sample of business loans originated and purchased during the period of January 1, 2016, through December 31, 2018. As detailed in the table above, 79.66

percent by number, and 82.69 percent by dollar amount, of originated and purchased loans were within FNB of Pasco's assessment area.

### **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

Based on the data in Table R, and performance context considerations discussed in Appendix B, the bank's lending to businesses of different sizes reflects reasonable distribution. As part of our analysis, we used a sample of 94 business loans originated and purchased in the assessment area during the evaluation period. Based on Table R and the performance context considerations described in appendix B, we concluded the distribution of the bank's originations and purchases to small businesses reflects reasonable distribution.

- For 2016, the distribution of bank's loans to small businesses was lower than the proportion of small businesses (gross annual revenues of \$1 million or less) in the assessment area and exceeds the aggregate distribution of loans to those businesses for those lenders that report small business loans.
- For 2017-2018 combined, the distribution of bank loans to small businesses was lower than the proportion of small businesses (gross annual revenues of \$1 million or less) in the assessment area and exceeds the aggregate distribution of loans to those businesses for those lenders that report small business loans.

### **Geographic Distribution of Loans**

Based on Table Q and the performance context considerations described in Appendix B, we concluded that the geographic distribution of the bank's business loan originations and purchases across geographies of different income levels reflects excellent distribution. We used the same sample for our analysis of the geographic distribution of loans as we did for our analysis of lending to businesses of different sizes.

- For 2016, the distribution of the bank's business loans made in low- and moderate-income geographies significantly exceeds the distribution of small businesses located in low- and moderate-income geographies in the assessment area. It also significantly exceeds the aggregate distribution of small business loans located in these geographies for those lenders that report small business loans.
- For 2017-2018 combined, the distribution of the bank's business loans made in low- and moderate-income geographies significantly exceeds the distribution of small businesses located in low- and moderate-income geographies in the assessment area. It also significantly exceeds the aggregate distribution of small business loans located in these geographies for those lenders that report small business loans.

## **Responses to Complaints**

No complaints were received during the evaluation period.

## 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 metropolitan and nonmetropolitan areas 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>	Lending Test: 01/01/2016 to 12/31/2018	
<b>Financial Institution</b>		<b>Products Reviewed</b>
First National Bank of Pasco Dade City, FL		Business Loans
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Tampa -St. Petersburg- Clearwater MSA #45300	Full Scope	Refer to Appendix B

## Appendix B: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNB of Pasco 2016						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	698	4.7	25.4	39.8	28.8	1.3
Population by Geography	2,610,465	3.9	24.6	40.0	31.4	0.2
Housing Units by Geography	1,253,526	3.6	25.6	40.8	30.0	0.0
Owner-Occupied Units by Geography	723,829	1.9	21.4	42.1	34.6	0.0
Occupied Rental Units by Geography	329,080	7.0	32.6	39.5	20.9	0.0
Vacant Units by Geography	200,617	3.9	29.1	38.3	28.7	0.0
Businesses by Geography	271,354	3.0	20.6	37.5	38.7	0.1
Farms by Geography	6,645	2.4	22.1	41.8	33.6	0.0
Family Distribution by Income Level	649,472	20.6	18.2	19.6	41.6	0.0
Household Distribution by Income Level	1,052,909	22.7	16.7	18.5	42.1	0.0
Median Family Income MSA - 45300 Tampa-St. Petersburg-Clearwater, FL MSA		\$57,333	Median Housing Value			\$200,913
			Median Gross Rent			\$920
			Families Below Poverty Level			9.5%

Source: 2010 U.S. Census and 2016 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.

Table A – Demographic Information of the Assessment Area						
Assessment Area: FNB of Pasco 2018						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	698	5.9	24.9	35.5	31.8	1.9
Population by Geography	2,713,649	4.8	23.1	36.9	34.8	0.4
Housing Units by Geography	1,284,294	4.6	24.1	38.2	32.9	0.2
Owner-Occupied Units by Geography	682,598	2.1	20.2	38.2	39.4	0.1
Occupied Rental Units by Geography	392,451	8.8	28.4	38.2	24.1	0.4
Vacant Units by Geography	209,245	5.1	28.7	38.0	28.1	0.1
Businesses by Geography	285,445	4.2	19.6	34.2	41.7	0.3
Farms by Geography	7,199	2.7	22.6	38.3	36.3	0.1
Family Distribution by Income Level	654,604	21.3	17.6	18.8	42.3	0.0
Household Distribution by Income Level	1,075,049	23.8	16.1	17.3	42.8	0.0
Median Family Income MSA - 45300 Tampa-St. Petersburg-Clearwater, FL MSA		\$58,916	Median Housing Value			\$158,005
			Median Gross Rent			\$983
			Families Below Poverty Level			11.2%

Source: 2015 ACS Census and 2018 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.

FNB of Pasco's assessment area is comprised of three counties – Hillsborough, Pinellas and Pasco counties. These counties are in the Tampa-St. Petersburg-Clearwater MSA #45300. The bank has delineated all census tracts within the three counties as its assessment area. The assessment area meets the requirements of CRA and does not arbitrarily exclude low- and moderate-income geographies.

In 2018, based on the 2015 ACS Census, 41, (5.9 percent) of total census tracts were designated as low-income, 174 (24.8 percent) as moderate-income, 248 (35.4 percent) as middle-income, and 222 (31.7 percent) as upper-income. Sixteen census tracts are designated as not applicable. The population for the assessment area was 2,713,649, of which 1,075,049 are households and 654,604 are families. Of the total population, 757,714 (27.9 percent) are low- or moderate-income and 1,045,455 (38.5 percent) are middle- or high-income.

Based on 2018 Dunn & Bradstreet Data and 2015 ACS Census, there were 285,445 total businesses of which 254,618 (89.2 percent) reported having total revenue of less than \$1 million, 11,359 (4.0 percent) report having total revenue greater than \$1 million, and 19,468 (6.8 percent) did not report total revenue. For businesses with total revenue less than \$1 million, 9,588 (3.8 percent) are located in low-income tracts, 49,029 (19.3 percent) are located in moderate-income tracts, 86,243 (33.9 percent) are in middle-income tracts, and 109,065 (42.8 percent) are in upper-income tracts, with 693 (0.2 percent) not in a designated tract.

As of December 31, 2018, unemployment for the Tampa-St. Petersburg-Clearwater MSA is reported as 3.4 percent, lower than the Florida and national rates of 3.6 percent and 3.9 percent, respectively. Per the Tampa Bay Business Journal and the St. Pete Catalyst, the MSA experienced increased job growth at 2.8 percent across all industries, outpacing the nation. Combined with increased wages and low inflation, consumers experienced greater buying power.

As mentioned in the Description of the Institution, banking is competitive in the assessment area. FDIC deposit market share data dated June 30, 2018, shows FNB of Pasco with a 0.18 percent market share. Top competitors are Raymond James Bank, N.A., Bank of America, N.A., Wells Fargo Bank, N.A., and SunTrust Bank with a combined deposit market share of 63.04 percent. Individually, each has market share for deposits greater than 10.0 percent. Similarly, business lending market share reports for the assessment area and based on data taken from the Large Bank CRA banks for 2017 (2018 data was not available), there are 174 lenders within the assessment area. The top two market share competitors in the assessment area are American Express, F.S.B. and Bank of America, N.A., both predominantly small business credit card lenders with a combined market share of 33.0 percent by number of loans, with an average loan size of \$20,500.

According to DataUSA.io, the economy of Tampa-St. Petersburg-Clearwater MSA is fueled by three major industries: health care, retail trade, and hotel/motel and food services. The largest employers are BayCare Health Services, HCA Healthcare, Publix Super Markets, University of South Florida, and county school districts and local governments. Advances are also being made in the technology sector as the Tampa Bay area is now considered the “gateway to the Florida High Tech Corridor.”

Prior to our CRA evaluation, we obtained from another banking agency a recent interview of one local nonprofit community-based organization that serves small businesses throughout the bank's assessment area. The contact mentioned the credit needs in the community is access to smaller amount loans (less than \$150,000) by local lenders and low-cost business deposit accounts.

## Appendix C: 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 areas 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 Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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 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) throughout those geographies. Because small business data is 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 Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. 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** **2016**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Tampa MSA	38	14,133	100.0	71,301	3.0	5.3	3.5	20.6	26.3	19.9	37.6	42.1	37.5	38.7	26.3	39.0	0.1	0.0	0.1

Source: 2016 D&B Data; 01/01/2016-12/31/2016 sample from bank origination report; 2016 CRA Aggregate Data. Due to rounding, totals may not equal 100.0

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2017-2018**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Tampa MSA	56	29,221	100.0	71,126	4.2	8.9	4.8	19.5	23.2	19.5	34.2	32.1	33.9	41.8	35.7	39.0	0.1	0.0	0.1

Source: 2018 D&B Data; 01/01/2017-12/31/2018 sample from bank origination report; 2017 CRA Aggregate Data (2018 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
Tampa MSA	38	14,133	100.0	71,301	89.2	65.8	48.3	3.9	26.3	6.9	7.9
<i>2016 D&amp;B Data; 01/01/2016-12/31/2016 sample from bank loan origination report; 2016 CRA Aggregate Data.</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
Tampa MSA	56	29,221	100.0	71,126	89.2	71.4	52.0	4.0	26.8	6.8	1.8
<i>2018 D&amp;B Data; 01/01/2017-12/31/2018 sample from bank loan origination report; 2017 CRA Aggregate Data (2018 not available).</i>											