



PUBLIC DISCLOSURE

March 5, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Interamerican Bank, A FSB
Charter Number 707506

9190 Coral Way
Miami, FL 33165-2049

Office of the Comptroller of the Currency

9850 N.W. 41 Street
Suite 260
Miami, FL 33178

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

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Overall CRA Rating

The Lending Test is rated: Satisfactory

Major factors that support this rating include:

- The Bank's level of lending, as it reflects in the quarterly average net loan-to-deposit ratio, is reasonable given its size and performance context factors.
- A substantial majority of the Bank's loans originated during the evaluation period were within its assessment area.
- The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable throughout the Bank's assessment area.
- The geographic distribution of loans within low- and moderate-income census tracts is reasonable.
- The Bank did not receive any CRA-related complaints during the evaluation period.

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 metropolitan area/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 the U.S. Department of Housing and Urban Development (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 CT delineated by the U.S. Census Bureau 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, or 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 metropolitan area/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 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.

Description of Institution

Interamerican Bank, a FSB (Bank) is a \$202 million federal savings association headquartered in Miami, Florida. The Bank was chartered in 1976 and currently has five branches. Four branches are located in Miami-Dade County, with two offices in Miami, one in Kendall, and one in Hialeah. One branch is located in Palm Beach County in the city of West Palm Beach. Three branches are located in moderate-income CTs, and one is located in a middle-income CT. The Bank has no operating subsidiaries or affiliates. The Bank did not have any merger or acquisition activity during this evaluation period nor opened or closed any branches since the last CRA evaluation.

The Bank is a full-service bank offering traditional loan and deposit products and services to individuals and businesses, as well as internet banking services and automated teller machines (ATMs). The Bank's primary products include one-to-four family residential loans and commercial loans. As of December 31, 2018, the Bank reported total equity capital of \$26.3 million and tier 1 capital of \$26.2 million. During the same time period, commercial loans represented 53.8 percent of gross loans, and residential real estate loans represented 44.7 percent. For this evaluation, we concluded that small business and residential real estate loans were the primary loan products. Consumer loans represented 1 percent of the Bank's gross loans.

The Bank operates in a highly competitive market. Based on the June 30, 2018 Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits-Market Share Report, Interamerican Bank's presence in the assessment area (AA) is low, as it has less than 1 percent of the deposit market share in the Miami-Fort Lauderdale-West Palm Beach, FL Metropolitan Statistical Area (MSA 33100)

The Bank faced challenges to its ability to help meet the credit needs of its AA as the Bank was operating under a Consent Order dated September 19, 2012 (Order) that includes requirements for the Bank to reduce credit risk and problem assets among other areas of focus. Despite the effort to maintain compliance with the Order, the Bank has managed to address the community credit needs in its AA. We considered these challenges when evaluating the Bank's CRA performance. At its last CRA evaluation dated August 16, 2014, the Bank was rated "Satisfactory."

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a review of Interamerican Bank's CRA performance within its AA under the small bank examination procedures, which is solely based on the Lending Test. The evaluation period for the Lending Test is from January 1, 2016 through September 30, 2018. Primary products reviewed include one-to-four family residential loans and small business loans. The evaluation included a review of demographic and economic data about the Bank's AA and information about local economic conditions, the Bank's major business products and strategies, financial condition, capacity, and ability to lend in its community. The review also included gathering information from examinations of other institutions serving the same or similar AAs, reviewing information from other recent community contacts, and reviewing information about the AA developed cooperatively by the different agencies. Specific data included in the evaluation includes data reported by the Bank on its HMDA Loan Application Register (LAR) regarding one-to-four family residential loans and a total of 60 small business loans originated during the evaluation period.

Data Integrity

In December 2018, we completed a comprehensive HMDA data integrity review for residential real estate loans reported in 2016, 2017, and 2018. We found data for all years to be reliable. As a result, we relied on filed HMDA data for this CRA examination to assess Interamerican Bank's lending performance.

Selection of Areas for Full-Scope Review

The MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) AA received a full-scope review.

Ratings

The Bank's overall rating is based on the Bank's AA, which received a full-scope review. The rating is a combination of the borrower distribution, lending in the AA, and the loan-to-deposit ratio tests.

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

The OCC will consider any information that this Bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the Bank'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

The Bank demonstrated satisfactory performance under the Lending Test.

Interamerican Bank demonstrated satisfactory performance in each area of the Lending Test, and no CRA related complaints have been received since the prior CRA performance evaluation was issued. The Bank's loan-to-deposit (LTD) ratio is reasonable and meets the standard for satisfactory performance given the performance context. The Bank's lending within its AA is outstanding as the majority of loans were made inside the AA. Interamerican Bank's lending to borrowers with different incomes and small businesses of different sizes meets the standard for satisfactory performance with reasonable distribution to low- and moderate-income individuals and small businesses with gross revenues less than \$1 million. The Bank's lending across areas with different incomes meets the standard for satisfactory performance with reasonable distribution of lending in low- and moderate-income geographies.

Loan-to-Deposit Ratio

The Bank's LTD ratio is reasonable and meets the standard for satisfactory performance. The LTD ratio measures the extent to which the Bank has returned the deposits it has received to the community in the form of loans. The average of such ratios for each quarter-end of the evaluation period was used to determine the performance in this area. The average quarterly LTD for Interamerican Bank during the evaluation period was 86.2 percent. The quarterly average net LTD ratio for three banks similar in size was 95.8 percent, and the low was 85.2 percent. Peer banks used in the analysis reported total assets less than \$215 million and offered similar lending and deposit products.

Lending in Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	115	97.5	3	2.5	118	31,508	97.9	674	2.1	32,181
Small Business	63	92.6	5	7.4	68	34,410	98.5	514	1.5	34,924
Total	178	95.7	8	4.3	186	65,918	98.2	1,188	1.8	67,105

*Source: 01/01/2016-09/30/2018 Bank Data
Due to rounding, totals may not equal 100.0*

A substantial majority of home mortgage and small loans to businesses originated during the evaluation period are within the Bank's AA. By number, 95.7 percent of loans, and by dollar, 98.2 percent of loans are inside the Bank's overall AA. For home mortgage loans, 97.5 percent by number and 97.9 percent by dollar are inside the overall AA. For small loans to businesses, 92.6 percent of loans by number and 98.2 percent by dollar are inside the Bank's AA.

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

Please refer to Tables P and R in Appendix C for the facts and data used to evaluate the borrower distribution of the Bank's loan originations.

The Bank's lending to borrowers of different income levels and businesses of different sizes reflects reasonable distribution. The volume of consumer loans were not sufficient to test consumer lending performance in the AA.

Home Mortgage Loans

During the evaluation period, performance context issues made it difficult to provide home mortgage loans lending to low- and moderate-income borrowers in the AA. For this reason, more weight was given to lending to small businesses in reaching our conclusions.

The lack of affordable housing inventory and high housing costs contribute to the Bank's limited origination of loans to low-income borrowers. The median housing value in MSA 33100 during 2016 was \$284,593, and during 2017-2018 was \$227,861, while poverty levels were high for those periods at 14.1 percent and 16.3 percent, respectively. Loan subsidies are needed to assist low-income and moderate-income borrowers. Increasing home values, high property taxes, and homeowner's insurance costs also contribute to the inability of low-income and many moderate-income borrowers to become homeowners. Many lower priced homes are quickly purchased for cash by investors, further limiting the number of affordable homes available to low- and moderate-income buyers. The lower rates offered on the Federal Housing Administration (FHA) product offered by larger lenders is also a competitive factor that challenges the Bank's ability to originate to moderate-income buyers that meet FHA guidelines. In addition, it should be noted that the demand for refinance loans by low-income families is generally very limited. Many times low-income families have taken advantage of various subsidy programs and special mortgage products that have very low interest rates that would not make it necessary for them to refinance for a lower interest rate. Furthermore, some special programs do not allow for refinancing. For further discussion on performance context factors, please see the Market Profiles in Appendix B.

The distribution of home mortgage loans by the income level of the borrower in the MSA 33100 is poor considering performance context. The Bank did not make loans to low-income borrowers during 2016; however, aggregate lending to low-income borrowers was limited due to aforementioned performance context. The 2016 distribution of home

mortgage loans to moderate-income borrowers, although lower than the percentage of moderate-income families, was slightly above the proportion of loans to moderate-income borrowers. The 2017-2018 distribution of home mortgage loans to moderate-income borrowers was substantially lower than both the aggregate distribution of loans and the percentage of moderate-income families.

Small Business Loans

The distribution of loans to small businesses reflects reasonable distribution. The majority of the loans we tested within the Bank's AA were made to small businesses with revenues less than \$1 million. For the evaluation period, the distribution of loans to small businesses is higher than the aggregate, but lower than the percent of small businesses.

Geographic Distribution of Loans

Please refer to Tables O and Q in Appendix C for the facts and data used to evaluate the geographic distribution of the Bank's loan originations and purchases.

The Bank's lending to borrowers and businesses of different sizes in low- and moderate-income geographies reflect reasonable distribution.

Home Mortgage Loans

The distribution of home mortgage loans in low- and moderate-income geographies in the AA is reasonable considering performance context.

For 2016, the distribution of home mortgage loans in both low-income and moderate-income geographies exceeds the aggregate lending distribution and the percentage of owner-occupied housing units in those geographies.

For the years 2017 to 2018, the distribution of home mortgage loans in low-income geographies exceeds the aggregate distribution of loans and the percentage of owner-occupied housing units in low-income geographies. The distribution of home mortgage loans in moderate-income geographies is lower than the aggregate distribution of loans and the percentage of owner-occupied housing unit in moderate-income geographies.

Small Business Loans

The distribution of loans small businesses in low and moderate-income geographies in the AA is excellent.

For 2016, the distribution of small businesses loans in both low-income and moderate-income geographies exceeds the aggregate lending distribution and the percentage of businesses in those geographies.

For 2017 to 2018, the distribution of small businesses loans in both low-income and moderate-income geographies exceeds the aggregate lending distribution and the percentage of businesses in those geographies.

Responses to Complaints

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

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 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”).

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/16 to 09/30/18)	
Financial Institution		Products Reviewed
Interamerican Bank, A FSB Miami, FL		Small Business and Residential Real Estate Loans
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
33100 Miami-Fort Lauderdale- West Palm Beach MSA	Full-Scope	

Appendix B: Community Profiles for Full-Scope Areas

MIAMI-FT. LAUDERDALE-WEST PALM BEACH ASSESSMENT AREA (MSA 33100)

The full-scope AA consists of all of the Miami-Ft. Lauderdale-Palm Beach MSA, which includes all of the contiguous counties of Miami-Dade, Broward, and Palm Beach. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low- and moderate-income geographies. The accompanying table and discussion focuses on all three counties collectively.

Table A – Demographic Information of the Assessment Area Assessment Area: MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA*
Geographies (Census Tracts)	1,219	6.2	28.2	29.5	33.6	2.5
Population by Geography	5,861,000	5.8	28.9	31.5	33.4	0.4
Housing Units by Geography	2,484,604	5.5	27.9	30.9	35.3	0.3
Owner-Occupied Units by Geography	1,248,038	2.6	23.2	32.9	41.2	0.2
Occupied Rental Units by Geography	799,004	10.1	36.4	30.1	22.9	0.5
Vacant Units by Geography	437,562	5.6	25.9	26.7	41.2	0.6
Businesses by Geography	797,472	4.2	21.8	28.2	44.6	1.2
Farms by Geography	12,328	4.6	24.0	29.5	41.5	0.4
Family Distribution by Income Level	1,330,793	23.1	17.0	17.7	42.2	0.0
Household Distribution by Income Level	2,047,042	25.1	15.7	16.6	42.6	0.0
Median Family Income MSA - 33100		\$57,606	Median Housing Value			\$227,861
FFIEC Adjusted Median Family Income for 2018		\$ 52,300	Median Gross Rent			\$1,194
Households Below Poverty Level		16.3%	Families Below Poverty Level			13.5%
<i>Source: 2015 ACS Census, June 2018 D&B Data, 2018 FFIEC Median Family Income (MFI) Report</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>						

MSA 33100 had a total population of approximately 6 million people, with the largest concentration of population in the Miami-Dade County. According to the 2015 Census, MSA 33100 consisted of 1,219 geographies distributed as follows: 76 (6.2 percent) low-income, 344 (28.2 percent) moderate-income, 359 (29.5 percent) middle-income, 409 (33.6 percent) upper-income, and 31 (2.5 percent) no income designation.

The poverty level is high at 16.3 percent of the households and 13.5 percent of the families. Low- and moderate-income people have difficulty purchasing homes given the high housing costs and the added costs of insurance and taxes. Rents are also high for rental properties. The median monthly gross rent is \$1,194. Low- and moderate-income people and particularly low-income people would need assistance through subsidy programs for purchasing a home as well as for rental housing. Based on the adjusted median family income, 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 but not less than 50 percent of the median family income, which would be incomes of \$26,150 to less than \$41,840. The median home value in 2018 was \$227,861.

Community contacts indicate that the need for affordable housing is a critical need in the AA, as well as capital for small businesses and entrepreneurs, and financial literacy. MSA 33100 was severely impacted by the housing crisis that had its beginnings in 2006 and 2007 leading to the national recession that ended in 2009. Recovery has been sluggish during the evaluation but improving when considering the increased employment, decrease in foreclosure filings, increase in home sales, and other conditions. According to the Bureau of Labor Statistics, the unemployment rate in MSA 33100 during the evaluation period as of 2016, 2017, and September 2018 was 4.7 percent, 4.1 percent, and 3.7 percent, respectively, and represents a declining trend in unemployment.

Competition for financial services within MSA 33100 is intense and includes several branches of nationwide and regional banks, local community banks, credit unions, mortgage companies, and other nonbank financial service providers. As of June 30, 2018, the FDIC reports that Interamerican Bank's deposits in MSA 33100 total \$175 million, which is less than 1 percent of total deposits. The Bank ranked 62nd out of 93 financial institutions with a 0.07 percent market share. Competition for home mortgage and business lending, including small business, is also intense.

The five largest employers in the AA include: Publix Super Markets (39,100 employees), Baptist Health South Florida (19,989 employees), University of Miami (15,630 employees), Memorial Healthcare System (13,364 employees), and American Airlines (13,000 employees).

There are numerous nonprofit organizations located in the AA. These organizations provide various services to low- and moderate-income people or small businesses, such as affordable housing opportunities, financial literacy training, support for economic development activities, etc. Opportunities exist for banks to make donations, to originate or purchase loans, to partner with the nonprofit organizations with a CD mission or purpose in loan relationships to low- and moderate-income people or small businesses, to conduct literacy workshops, and more. Investment opportunities are highly competitive with banks purchasing investments to support the markets of affordable housing for low- and moderate-income individuals and small business lending.

Appendix C: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate MAs are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (please 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/AA. Deposit data is compiled by the FDIC and is available as of June 30th of each year. Tables without data are not included in this performance evaluation. 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 O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the Bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** – Compares the percentage distribution of the number of loans originated and purchased by the Bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/AA. 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 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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
33100 Miami-Fort Lauderdale-West Palm Beach	46	9,886	100.0	145,423	2.1	4.3	1.2	23.1	28.3	16.8	36.3	23.9	36.9	38.6	43.5	45.0	0.0	0.0	0.1
Total	46	9,886	100.0	145,423	2.1	4.3	1.2	23.1	28.3	16.8	36.3	23.9	36.9	38.6	43.5	45.0	0.0	0.0	0.1

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2018
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
33100 Miami-Fort Lauderdale-West Palm Beach	69	21,622	100.00	140,541	2.6	2.9	2.3	23.2	14.5	20.5	32.9	40.6	34.1	41.2	42.0	42.8	0.2	0.0	0.4
Total	69	21,622	100.00	140,541	2.6	2.9	2.3	23.2	14.5	20.5	32.9	40.6	34.1	41.2	42.0	42.8	0.2	0.0	0.4

Source: 2015 ACS Census; 01/01/2017 - 09/30/2018 Bank Data, 2017-2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
33100 Miami-Fort Lauderdale-West Palm Beach	46	9,886	100.0	145,423	22.4	0.0	2.2	17.3	10.9	9.6	18.6	15.2	17.6	18.9	15.2	53.7	0.0	8.7	16.8
Total	46	9,886	100.0	145,423	22.4	0.0	2.2	17.3	10.9	9.6	18.6	15.2	17.6	18.9	15.2	53.7	0.0	8.7	16.8

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2017-2018**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
33100 Miami-Fort Lauderdale-West Palm Beach	69	21,622	100.0	140,541	23.1	0.0	2.6	17.0	2.9	10.6	17.7	17.4	18.9	42.2	56.5	50.9	0.0	23.2	17.0
Total	69	21,622	100.0	140,541	23.1	0.0	2.6	17.0	2.9	10.6	17.7	17.4	18.9	42.2	56.5	50.9	0.0	23.2	17.0

Source: 2015 ACS Census; 01/01/2017 - 09/30/2018 Bank Data, 2017-2018 HMDA Aggregate Data, "--" data not available.
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 **2016**

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
33100 Miami-Fort Lauderdale-West Palm Beach	28	18,345	100	242,848	3.4	7.1	3.2	21.8	39.3	20.5	30.3	10.7	28.5	43.7	35.7	46.8	0.9	7.1	0.9
Total	28	18,345	100	242,848	3.4	7.1	3.2	21.8	39.3	20.5	30.3	10.7	28.5	43.7	35.7	46.8	0.9	7.1	0.9

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
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		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
33100 Miami-Fort Lauderdale-West Palm Beach	38	23,688	100	226,331	4.2	10.5	4.6	21.9	39.5	21.4	28.2	28.9	27.3	44.5	21.1	44.5	1.2	--	1.2
Total	38	23,688	100	226,331	4.2	10.5	4.6	21.9	39.5	21.4	28.2	28.9	27.3	44.5	21.1	44.5	1.2	--	1.2

Source: 2018 D&B Data; 01/01/2017 - 09/30/2018 Bank Data; 2017-2018 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 **2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
33100 Miami-Fort Lauderdale-West Palm Beach	28	18,345	100	242,848	90.7	82.1	48.5	3.8	10.7	5.5	7.1
Total	28	18,345	100	242,848	90.7	82.1	48.5	3.8	10.7	5.5	7.1

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 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 **2017-2018**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= IMM			Businesses with Revenues > IMM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
33100 Miami-Fort Lauderdale-West Palm Beach	38	23,688	100	226,331	90.6	78.9	52.9	4.0	15.8	5.3	5.3
Total	38	23,688	100	226,331	90.6	78.9	52.9	4.0	15.8	5.3	5.3

Source: 2018 D&B Data; 01/01/2017 - 09/30/2018 Bank Data; 2017-2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0