

PUBLIC DISCLOSURE

11/17/2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Mount Dora
Charter Number 13102

714 North Donnelly Street
Mount Dora, FL 32757

Office of the Comptroller of the Currency

4042 Park Oaks Boulevard, Suite 240
Tampa, FL 33610

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

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Overall CRA Rating

Institution's CRA Rating: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, and performance context factors.
- A substantial majority of the bank's loans are originated inside its assessment area (AA).
- The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- The distribution of home mortgage and business loans originations across geographies of different income levels is reasonable.

Description of Institution

The First National Bank of Mount Dora (FNBMD) was established in 1925 and is headquartered in Mount Dora, Lake County, Florida. The bank is a wholly owned subsidiary of FNBMD Bancshares, Inc., a one bank holding company which operates from the bank's main office. The bank did not open or close any offices since the last CRA evaluation.

The bank has four full-service offices in Lake County Florida. The bank offers traditional deposit and loan products for individuals and businesses. Deposit products include checking accounts, consumer savings and investment accounts. Lending products include residential real estate mortgages, commercial real estate, commercial & industrial, and consumer loans.

All offices have automated teller machines (ATMs) and drive-up facilities with reasonable hours of operations. In addition, the bank operates a stand-alone ATM located at the Mount Dora Chamber building in Lake County. FNBMD also allows its customers to access the ATM network owned by the Florida based Publix grocery store chain (Presto). This arrangement gives the bank's customers access to a network of 1,200 ATMs located at Publix stores throughout Florida, Georgia, Alabama, Tennessee, North Carolina, South Carolina, and Virginia. Other services provided to its customers include online banking, mobile banking, trust, and investment services.

As of December 31, 2021, the bank had total assets of \$373.9 million with total loans accounting for \$97.3 million, or 26 percent of total assets. The bank's lending strategy continues to be focused on the business and residential real estate needs of the community, representing 46.9 percent and 39.8 percent, respectively, of the total loan portfolio. The remaining loans in the portfolio consist of farmland and consumer, representing 7.8 percent and 5.8 percent, respectively.

FNBMD's assessment area is comprised of fifty-seven (57) whole census tracts; forty-four (44) census tracts are located in Lake County, Florida and thirteen (13) adjacent census tracts are located in northwest Orange County, Florida. The assessment area reflects FNBMD's primary footprint which extends to a radius of ten miles from each branch office. The assessment area is in the central region of the state and is part of the Orlando-Kissimmee-Sanford, Florida Metropolitan Statistical Area (Orlando MSA), which consists of Lake, Orange, Osceola, and Seminole Counties. Based on the 2021 American Community Survey (ACS) census data, there were no low-income tracts, seventeen (17) moderate-income tracts, thirty-one (31) middle-income tracts and nine (9) upper-income tracts in the assessment area. The assessment area meets the requirements of CRA and does not arbitrarily exclude low- or moderate-income census tracts.

There were no legal, financial, or other factors impeding the bank's ability in helping meet the credit needs in its assessment area. The bank was rated "Satisfactory" at the prior CRA evaluation dated September 4, 2018.

COVID-19 Pandemic

The COVID-19 health pandemic (COVID-19) impacted the bank's operations and customers starting in March 2020. Lockdowns were imposed on certain types of businesses and on April 1, 2020, a stay-at-home order was issued for the entire state. On April 29, 2021, the State of Florida suspended all COVID-19 public health restrictions and businesses were allowed to open at full capacity. The lockdowns led to many businesses and organizations being closed for varied periods of time, which limited the bank's ability to provide in-person services to its customers.

The bank participated in the Small Business Administration (SBA)'s Payroll Protection Plan (PPP) to address the needs of businesses during the pandemic. Although not an SBA Lender, the bank's participation in the first round of PPP starting in 2020 as well as the second round in 2021 resulted in originating a total of 334 PPP loans totaling \$25.6 million which provided much needed funds to support struggling business during the pandemic. Considerable resources were deployed to ensure much needed relief was provided to struggling businesses during this time. In addition, the bank served its customers during the lockdowns by opening accounts, closing loans, and providing notary services through one of the four drive-up facilities. For those loan customers facing financial hardships, loan payment deferrals or extensions were offered.

Community Contacts

As part of this evaluation, the OCC consulted two nonprofit organizations working in the assessment area, a nonprofit affordable housing organization and the other an economic development organization whose mission is to attract new and diversified businesses and retain those existing businesses with assistance and support. The contacts identified several credit needs to include start-up working capital funding, financial counseling and affordable housing. Many of households live in older mobile homes, or overpriced units. The real estate market is rising and continuing to create a housing problem for those who can't afford the entry level units at market rate. The contacts identified numerous programs those financial institutions could benefit including the Community Contribution Tax Credit Program and Corporate Team Build events.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated the bank's CRA performance using Small Bank performance criteria which evaluates the bank's record of meeting the credit needs of its assessment area through its lending activities.

The evaluation period is from January 1, 2019, through December 31, 2021.

The bank provided a report with data of all loans made during the evaluation period. There was a total of 859 loans totaling \$118 million of which 49 percent of the dollar volume of loans was centered in business loans and 42 percent in home mortgages. We determined the primary loan products during the evaluation period were home mortgages and business lending.

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 assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

FNBMD has one AA which was evaluated as a full-scope AA. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

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

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The CRA performance rating was not lowered as a result of these findings. We considered the nature, extent, and strength of the evidence of the practices; the extent to which institution had policies and procedures in place to prevent the practices; and the extent to which the institution has taken or has committed to take corrective action, including voluntary corrective action resulting from self-assessment; and other relevant information.

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.

LENDING TEST

The bank's performance under the Lending Test in the Orlando-Kissimmee-Sanford Metropolitan Statistical Area is rated Satisfactory.

Loan-to-Deposit Ratio

The bank's loan-to-deposit ratio (LTD) is reasonable considering the bank's size, financial condition, economic climate, and credit needs of the AA.

This determination is based on the quarterly average LTD ratio (16 quarters from the first quarter of 2019 to the fourth quarter of 2021) was 42.73 percent. For the same period, FNBMD's ratio was lower than the one similarly situated bank operating in the bank's assessment area (Lake and Orange Counties) which ranged averaged 56.03 percent.

BANK NAME	CITY	STATE	COUNTY	TOTAL ASSETS (000s)	AVERAGE LTD
The First National Bank of Mount Dora	Mount Dora	FL	Lake	\$413,915	42.73
United Southern Bank	Umatilla	FL	Lake	\$858,678	56.03

The bank's LTD ratio steadily declined during the evaluation period from 53 percent in the first quarter of 2019 to 29 percent in the fourth quarter of 2021. The bank reported excess liquidity on its balance sheet due to the strong deposit growth associated with PPP, which negatively impacted the LTD ratio in 2020 and 2021. Additionally, FNBMD also saw an increase in the number of new deposit customers who are seeking a personal banking relationship with a local community bank.

Lending in Assessment Area

A substantial majority of the bank's loans were originated inside the assessment area.

The bank originated 94 percent of its total loans inside the AA during the evaluation period. Our conclusion was based on a random sample of 69 business loans and 91 home mortgages made during January 1, 2019 through December 31, 2021.

Lending to businesses that were significantly impacted by COVID-19 was a major factor when evaluating the bank's overall lending performance. Of the 69 business loans sampled, 8 were PPP loans made to local businesses impacted by the pandemic. These loans were included in the analysis of the bank's performance of distribution of lending to small businesses by income level of the geography and distribution of lending to businesses by revenue level.

Loans made inside the assessment area are factored into the overall lending gap analysis of the geographic distribution of lending by income level of geography. Our review of the geographies that comprise the bank's assessment area and distribution of lending for small business loans did not reveal any unexplained conspicuous gaps.

Lending Inside and Outside of the Assessment Area 2019-2021										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	88	97%	3	3%	91	15,211	97%	440	3%	15,651
Small Business	62	90%	7	10%	69	9,205	88%	1,253	12%	10,458
Total	150	94%	10	6%	160	24,416	94%	1,693	6%	26,109

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of home mortgage and business loan originations across different income levels.

Home Mortgage Loans

Based on Table O and performance context considerations described in appendix B, we concluded the geographic distribution of the bank's home mortgage originations made during the evaluation period is reasonable.

- For 2019-2021 combined, the bank did not make any home mortgage loans in low-income geographies as there were no low-income geographies in the assessment area. The bank's distribution and aggregate home mortgage lending in moderate-income geographies was higher than the proportion of owner-occupied housing units in moderate-income geographies and aggregate lending in those geographies.
- Based on demographic data, there were limited lending opportunities in low- and moderate-income geographies in the assessment area due to a limited supply of affordable housing units mainly due to the high housing costs. Out of the 128,114 housing units, 24.9 percent are located in moderate-income geographies of which 19.5 are owner-occupied units, 36.7 percent rentals, and 30.4 percent are vacant units. Home mortgage lending is very competitive in Lake and Orange Counties all competing for the same home mortgage loans.

Small Loans to Businesses

Based on Table Q, the bank's size and performance context considerations, we concluded the geographic distribution of small business loans made during the evaluation period is reasonable.

- For 2019-2021 combined, the bank did not make any small business loans in low-income geographies as there were no low-income geographies in the assessment area. The overall distribution of the bank's small business loans operating in moderate-income geographies exceeds the percentage of small businesses operating in moderate-income geographies in the assessment area and exceeds the aggregate distribution of small businesses operating in moderate-income geographies. Small business lending is very competitive in Lake and Orange Counties with lenders all vying for the same small business loans.

Distribution of Loans by Income Level of the Borrower

Based on data in Tables P and R, and performance context considerations, the bank's lending to borrowers of different income levels and businesses of different sizes is reasonable.

Home Mortgage Loans

Based on Table P and performance context consideration, we concluded the distribution of lending to low-and moderate-income borrowers is reasonable.

- For 2019, the bank's distribution of loans to low-income borrowers was somewhat lower than the proportion of low-income families residing in the assessment area but stronger than the aggregate distribution of loans to those borrowers. The distribution of loans to moderate-income borrowers is stronger than the moderate-income families residing in the assessment area. The bank's proportion of loans to moderate-income families in the assessment area is significantly stronger than the aggregate distribution of loans to those borrowers.
- For 2020 and 2021 combined, the bank's distribution of loans to low-income borrowers was lower than the proportion of low-income families residing in the assessment area but compares favorably to the aggregate distribution of loans to those borrowers. The distribution of loans to moderate-income borrowers is near to the distribution of moderate-income families residing in the assessment area. The bank's proportion of loans to moderate-income families in the assessment area is stronger than the aggregate distribution of loans to those borrowers.

Small Loans to Businesses

Based on Table R and the performance context, we concluded the distribution of lending to small business is reasonable.

- For 2019, the distribution of bank's loans to small businesses in the assessment area was less than the proportion of small businesses (gross annual revenues of \$1 million or less) and significantly stronger than the aggregate distribution of loans to those businesses in the assessment area.
- For 2020 and 2021 combined, the distribution of bank's loans to small businesses (gross annual revenues of \$1 million or less) was less than the proportion of small businesses and significantly stronger than the aggregate distribution of loans to those businesses in the assessment area.

Responses to Complaints

The bank received no complaints related to its CAA performance during the evaluation period.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	01/01/2019 to 12/31/2021	
Bank Products Reviewed:	Home Mortgage and Small Business Loans (excludes CD loans)	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
FNB of Mount Dora Assessment Area – Portions of Lake and Orange Counties	Full Scope	

Appendix B: Community Profiles for Full Scope Areas

Table A – Demographic Information of the Assessment Area						
Assessment Area: Mount Dora AA 2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	0.0	29.8	54.4	15.8	0.0
Population by Geography	276,351	0.0	24.6	55.5	19.9	0.0
Housing Units by Geography	128,114	0.0	24.9	58.0	17.0	0.0
Owner-Occupied Units by Geography	79,679	0.0	19.5	59.0	21.5	0.0
Occupied Rental Units by Geography	26,347	0.0	36.7	53.9	9.4	0.0
Vacant Units by Geography	22,088	0.0	30.4	59.5	10.1	0.0
Businesses by Geography	29,119	0.0	28.0	50.5	21.5	0.0
Farms by Geography	1,405	0.0	23.3	53.7	22.9	0.0
Family Distribution by Income Level	72,769	21.0	20.9	20.4	37.6	0.0
Household Distribution by Income Level	106,026	24.4	18.2	19.2	38.2	0.0
Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA		\$57,304	Median Housing Value			\$127,814
			Median Gross Rent			\$964
			Families Below Poverty Level			10.9%

Source: 2015 ACS and 2019 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Mount Dora AA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	57	0.0	29.8	54.4	15.8	0.0
Population by Geography	276,351	0.0	24.6	55.5	19.9	0.0
Housing Units by Geography	128,114	0.0	24.9	58.0	17.0	0.0
Owner-Occupied Units by Geography	79,679	0.0	19.5	59.0	21.5	0.0
Occupied Rental Units by Geography	26,347	0.0	36.7	53.9	9.4	0.0
Vacant Units by Geography	22,088	0.0	30.4	59.5	10.1	0.0
Businesses by Geography	31,267	0.0	27.5	51.1	21.5	0.0
Farms by Geography	1,486	0.0	24.4	53.4	22.3	0.0
Family Distribution by Income Level	72,769	21.0	20.9	20.4	37.6	0.0
Household Distribution by Income Level	106,026	24.4	18.2	19.2	38.2	0.0
Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA		\$57,304	Median Housing Value			\$127,814
			Median Gross Rent			\$964
			Families Below Poverty Level			10.9%

Source: 2015 ACS and 2020 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.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (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

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019
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	
Mount Dora RRE 2019	48	8,821	100.0	13,675	0.0	0.0	0.0	19.5	20.8	15.2	59.0	66.7	59.9	21.5	12.5	25.0	0.0	0.0	0.0	
Total	48	8,821	100.0	13,675	0.0	0.0	0.0	19.5	20.8	15.2	59.0	66.7	59.9	21.5	12.5	25.0	0.0	0.0	0.0	

Source: 2015 ACS; 01/01/2019 - 12/31/2019 Bank Data, 2019 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																				2020/2021
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	
Mount Dora RRE 2020/2021	40	6,390	100	17,936	0.0	0	0.0	19.5	12.5	13.9	59.0	80	59.5	21.5	7.5	26.6	0.0	0	0.0	
Total	40	6,390	100	17,936	0.0	0	0.0	19.5	12.5	13.9	59.0	80	59.5	21.5	7.5	26.6	0.0	0	0.0	

Source: 2015 ACS; 01/01/2020 - 12/31/2020 Bank Data, 2020 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																			2019
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
Mount Dora RRE 2019	48	8,821	100.0	13,675	21.0	6.3	4.3	20.9	25.0	16.9	20.4	18.8	24.7	37.6	39.6	36.0	0.0	10.4	18.1
Total	48	8,821	100.0	13,675	21.0	6.3	4.3	20.9	25.0	16.9	20.4	18.8	24.7	37.6	39.6	36.0	0.0	10.4	18.1

*Source: 2015 ACS ; 01/01/2019 - 12/31/2019 Bank Data, 2019 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																			2020/2021
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
Mount Dora RRE 2020/2021	40	6,390	100	17,936	21.0	5	3.8	20.9	20	15.9	20.4	27.5	22.3	37.6	47.5	35.3	0.0	0	22.8
Total	40	6,390	100	17,936	21.0	5	3.8	20.9	20	15.9	20.4	27.5	22.3	37.6	47.5	35.3	0.0	0	22.8

*Source: 2015 ACS ; 01/01/2020 - 12/31/2020 Bank Data, 2020 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																				2019
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
FNBMDAA	20	1,772	100	7,004	0.0	0.0	0.0	28.0	40.0	27.7	50.5	35.0	50.8	21.5	30.0	21.5	0.0	--	0.0	
Total	20	1,772	100	7,004	0.0	0.0	0.0	28.0	40.0	27.7	50.5	35.0	50.8	21.5	30.0	21.5	0.0	--	0.0	

*Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 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																				2020/2021
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	
FNBMDAA	48	8,373	100	7,404	0.0	0.0	0.0	27.5	37.5	28.6	51.1	43.8	50.2	21.5	6.3	21.2	0.0	12.4	0.0	
Total	48	8,373	--	7,404	0.0	0.0	0.0	27.5	37.5	28.6	51.1	43.8	50.2	21.5	6.3	21.2	0.0	12.4	0.0	

*Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 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												2019
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	
Mount Dora AA 2019	21	1,822	100.0	7,004	91.4	81	45.2	3.0	19	5.7	0.0	
Total	21	1,822	100.0	7,004	91.4	81	45.2	3.0	19	5.7	0.0	
<i>Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020/2021
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	
Mount Dora AA 2020/2021	48	8,634	100.0	7,404	91.8	72.9	38.4	2.8	20.8	5.5	6.3	
Total	48	8,634	100.	7,404	91.8	72.9	38.4	2.8	20.8	5.5	6.3	
<i>Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												