



## **PUBLIC DISCLOSURE**

June 3, 2019

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

Amerant Bank, National Association  
Charter Number: 16804

220 Alhambra Circle, Suite 212  
Coral Gables, FL 33134

Office of the Comptroller of the Currency

Miami Field Office  
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

**Institution’s CRA Rating:** This institution is rated Outstanding

The following table indicates the performance level of Amerant Bank, National Association (Amerant) with respect to the Lending, Investment, and Service Tests:

Performance Levels	Amerant Bank, NA Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the excellent level of community development (CD) lending with Amerant being a leader in CD lending, the good geographic and borrower distribution of lending and a substantial majority of the Bank’s loans being in the assessment areas (AA).
- The Investment Test rating is based on the excellent level of investments and good responsiveness to credit and community economic development needs.
- The Service Test rating is based on the reasonable accessibility of branch offices and the Bank being a leader in providing CD services.

### Lending in Assessment Area

A substantial majority of the Bank’s loans are in its AA.

The Bank originated and purchased 96.8 percent of its total loans inside the Bank’s AAs during the evaluation period. This analysis is performed at the Bank level rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	872	96.0	36	4.0	908	797,728	77.1	237,005	22.9	1,034,733
Small Business	616	97.9	13	2.1	629	212,236	96.5	7,590	3.5	219,826
Total	1,488	96.8	49	3.2	1,537	1,009,964	80.5	244,595	19.5	1,254,559

## Description of Institution

Amerant Bank, N.A. (Amerant), previously known as Mercantil Bank, N.A. until the fourth quarter of 2018, is a multistate bank headquartered in Coral Gables, Florida. Amerant Bank is a wholly-owned indirect subsidiary of Amerant Bancorp Inc., a Florida corporation also headquartered in Coral Gables, Florida, which was formerly known as Mercantil Bank Holding Corporation (MBHC). The Bank has two principal subsidiaries, Amerant Investments, Inc., a securities broker-dealer, and Amerant Trust, N.A, a non-depository trust company. There were no CRA related activities from bank subsidiaries to consider.

Amerant has two AAs, MSA 33100 in Florida (FL) and MSA 26420 in Texas (TX). The Bank operates 15 banking offices in the state of FL and 8 banking offices in the state of TX with ATMs located at each branch. As of December 31, 2018, Amerant reported \$8.1 billion in total assets and \$5.9 billion in total loans. Total loans represent 73.0 percent of total assets and consisted of 9.0 percent residential, 64.6 percent commercial real estate loans, 24.5 percent commercial, and 1.92 percent consumer loans. Included in the loan categories were loans secured by multi-family residential properties that represented 15.4 percent of the loan portfolio. Deposits totaled \$6.1 billion and tier one capital was \$826 million, or 9.96 percent of average assets.

The majority of the Bank's deposit accounts are owned by customers living in Venezuela as a result of the Bank's strategy to seek referrals of customers who desire dollar denominated accounts and the safety of Federal Deposit Insurance Corporation (FDIC) insurance. The Bank continues to increase its domestic deposit base and is focused on serving its retail consumers and small businesses. As of December 31, 2018, approximately 49.8 percent of the Bank's deposits were domestic and 50.2 percent were international customers. Approximately 89.2 percent of the deposits are in Florida and 10.8 percent were in Texas.

During the evaluation period, Amerant faced significant challenges in its efforts to meet the credit needs in its AAs. There is significant competition in the Bank's AAs with many large national and regional financial institutions. The limited supply of available housing for LMI people as well as high housing costs makes it challenging to make residential home loans. Purchasing these types of loans from other financial institutions has diminished during the evaluation period. Amerant's performance was rated "Outstanding" at its last CRA evaluation dated April 11, 2016.

The Bank provides a full range of banking and investment services to businesses and consumers, including personal and business deposit products, Internet and mobile banking, personal, commercial and mortgage loans, and treasury management solutions. The Bank had the following branch network during the evaluation period:

**MSA 33100 FL**

- Five branches with ATMs at separate locations in Broward County,
- Nine branches with ATMs at separate locations in Miami-Dade County, and
- One branch with ATM in Palm Beach County.

**MSA 26420 TX**

- Six branches with ATMs at separate locations in Harris County,
- One branch in Fort Bend County, and
- One branch with ATM in Montgomery County.

**Scope of the Evaluation****Evaluation Period/Products Evaluated**

This Performance Evaluation assesses the Bank's performance under the Lending, Investment, and Service Tests. In evaluating the Bank's lending performance, we reviewed residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA), small loans to businesses, and CD loans, as reported under the CRA. We also evaluated CRA qualified investments and CD services. The Bank reported no small loans to farms; therefore, tables for this product are not included in the Core Tables of this report (Appendix D).

The evaluation period for the Lending Test and CD loans is January 1, 2016 through December 31, 2018. For the Investment Test and Service Test, the evaluation period is April 11, 2016 through December 31, 2018. Our conclusions related to CD loans, qualified investments including donations, and CD services were based on the number and dollar amounts made during the evaluation period. In addition, we considered the level of innovation, complexity, responsiveness to community credit needs and the degree to which these instruments are not routinely provided by private investors.

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

In each state where the Bank has an office, one or more AA(s) 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. Refer to the "Scope" section under each State Rating section 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.

Amerant's two AAs are comprised of MSA 33100 Miami-Ft Lauderdale-West Palm Beach FL that includes the counties of Miami-Dade, Broward, and Palm Beach and the partial MSA 26420 Houston-The Woodlands-Sugar Land, TX that includes the counties of Harris, Montgomery, and Fort Bend. Both AAs received a full scope review. The Bank has no limited-scope AAs.

## **Ratings**

The Bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. The MMSA and state ratings are based on performance in all Bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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

Pursuant to 12 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 Bureau of Consumer Financial Protection, as applicable.

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

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

## State Rating

### State of Florida

**CRA rating for the State of Florida:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to meeting the credit needs of the Bank's assessment area, given performance context,
- A good geographic distribution of loans, given performance context and considering the substantial majority of lending inside the Bank's assessment area,
- A good distribution of loans by the income level of the borrower, given performance context,
- The Bank is a leader in making CD loans,
- CD lending that had a significantly positive impact on the overall Lending Test conclusion,
- An excellent level of qualified investments including donations,
- Retail delivery systems reasonably accessible to low- and moderate-income (LMI) geographies, and
- The Bank is a leader in providing CD services.

### Description of Institution's Operations in Florida

Amerant Bank operates 15 branches and 15 ATMs in the state of Florida. There are nine full service branches in Miami-Dade County, five full service branches in Broward County and one full service branch in Palm Beach County. A substantial majority of the Bank's deposits are from the Florida branches representing 89.2 percent of the Bank's total deposits. Based on the FDIC's Deposit Market Share Report as of June 30, 2018, Amerant's deposit market share in the MSA is approximately 2.4 percent and it ranked tenth out of 93 banks in the AA. Major competitors include the National Associations of Bank of America, Wells Fargo, JP Morgan Chase, and Citibank that all together hold approximately 49.4 percent of the AA deposits.

For the Florida operation, 50.1 percent or approximately \$3.0 billion were from international customers as of December 31, 2018. Domestic loans were \$4.4 billion, and domestic deposits totaled approximately \$2.4 billion. International deposits provide significant support in the funding of domestic loans.

The following tables depict the demographic information for the AA.

### Miami-Fort Lauderdale-West Palm Beach, FL MSA 33100

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Miami-Broward-Palm Beach MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,216	6.3	28.3	29.5	33.6	2.3
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	788,527	4.3	21.9	28.2	44.4	1.2
Farms by Geography	12,259	4.8	23.9	29.6	41.4	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
FFIEC Updated MSA Median Family Income MSA - 33100 Miami-Fort Lauderdale-West Palm Beach, FL		\$62,379	Median Housing Value			\$227,861
			Median Gross Rent			\$1,194
			Families Below Poverty Level			13.5%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Community contacts indicate that the need for affordable housing is a critical need in the AA as well as capital for small businesses. Miami-Dade County was severely impacted by the housing crisis that began in 2006 and 2007 leading to the national recession that ended in 2009. Recovery was slow, but for the past ten years, employment has improved, as well as home sales. The poverty level for the AA is high with 13.5 percent of the families living below the poverty level. Given the economic improvements, housing and rental prices have increased. The 2015 ACS Census estimates the median



value of owner-occupied housing units in the AA is \$227,861. The rents are also high for rental properties in the AA.

The Federal Financial Institutions Examination Council (FFIEC) estimated a median family income for MSA 33100 of \$62,379 based on the American Community Survey (ACS) for the 2015 Census update. Considering the median family income and the high poverty level in the AA, LMI families have difficulty with affording mortgage payments without subsidies given the high housing costs and added costs of insurance and taxes. Based on the median family income at the MSA level, low-income is considered less than 50 percent of the median family income which would be an income of less than \$31,189 per year. Moderate income is less than 80 percent of the median income but not less than 50 percent of the median family income or \$49,903. LMI renters, particularly low-income, also need rental subsidies to assist with rental payments. According to the 2015 ACS Census, 19.1 percent of households spend more than 30 percent of their income for mortgage payments, and 19.1 percent of households spend more than 30 percent of their income for rental payments.

According to Dunn and Bradstreet, there were 788,527 non-farm businesses in the AA for 2018, of which approximately 90.6 percent are considered small business. Small businesses are defined as having revenues of \$1 million or less.

The banking industry in the AA is very competitive for loans, deposits, and investments, as well as CRA CD opportunities. There are several branches of nationwide and regional banks, local community banks, mortgage companies, credit unions, and other nonbank financial service providers.

Investment opportunities are highly competitive with banks purchasing investments to support affordable housing for LMI individuals/geographies and small business lending. Many community banks tend to purchase mortgage backed securities with home mortgages to LMI people or loans in LMI geographies, affordable housing multifamily properties, or Small Business Administration loan pools in their AAs. The opportunity to make donations/grants to qualifying organizations that have missions that support the CRA CD purpose are available. CD lending opportunities are available in the AA including opportunities to partner with nonprofit organizations that have a CD mission or purpose. There are numerous nonprofit organizations located in the AA that provide various services to LMI people or small businesses, such as affordable housing opportunities, financial literacy training, support for economic development activities, and more.

## **Scope of Evaluation in Florida**

The evaluation period for the Lending Test and CD loans is January 1, 2016 through December 31, 2018. For the Investment Test and Service Test, the evaluation period is April 11, 2016, through December 31, 2018. Our conclusions related to CD loans, qualified investments including donations, and CD services were based on the number and dollar amounts made during the evaluation period. In addition, we considered the level of innovation, complexity, responsiveness to community credit needs and the degree to which these instruments are not routinely provided by private investors.

Amerant had one assessment area in Florida that includes all of MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL). This MSA consists of three Metropolitan Divisions (MD) including MD 33124 (Miami-Miami Beach-Kendall, FL) which is equivalent to Miami-Dade County, MD 22744 (Ft. Lauderdale-Pompano-Deerfield Beach, FL) which is equivalent to Broward County, and MD 48424 (West Palm Beach, FL) which is equivalent to Palm Beach County.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

### LENDING TEST

The Bank's performance under the Lending Test in Florida is rated Outstanding. Based on full-scope review in MSA 33100, the Bank's lending distribution performance was good and its level of CD loan activity had a significantly positive impact on the overall lending test for Florida.

The major factors that support this rating include:

- Excellent geographic distribution of loans in the Bank's assessment area.
- Good distribution of loans by income level of the borrower in the Bank's assessment area.
- Excellent CD lending with a significantly positive impact on the Lending Test.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank's performance in the MSA 33100 is excellent.

### Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
MSA 33100	672	502	0	115	1,289	100	100

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
MSA 33100	561,492	172,275	0	340,568	1,074,335	100	100

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Lending levels reflect good responsiveness to AA credit needs.

Based on the data in Lending Volume Tables O, P, Q, and R and the following performance context considerations, we concluded that lending activity is good. The Bank originated a good volume of loans in the AA relative to its capacity based on deposits, competition, market presence, and business strategy.

### ***Mortgage Loans***

Amerant's proportion of home mortgage loans by the number of loans is significantly lower than its deposit market share. Based on the June 30, 2018 FDIC Deposit Market Share data, Amerant's deposit market share ranked 10th out of 93 financial institutions with a deposit market share of 2.4 percent. The Bank is ranked 152 out of 1,081 mortgage lenders and had approximately a 0.1 percent lender market share of home loans. Given the highly competitive home mortgage market in the AA from specialized home mortgage companies, state and nationwide banks, as well as considering the Bank's lending strategy focused on commercial lending, the lending activity for home mortgages is considered adequate. The top five mortgage lenders hold approximately 23.9 percent of the total lender market share. The top five lenders are Wells Fargo Bank National Association (NA), Quicken Loans, Caliber Home Loans, J. P. Morgan Chase Bank NA and Paramount Residential Mortgage.

### ***Business Loans***

The Bank has approximately a 0.1 percent market share of small loans to businesses by the number of loans and is ranked 49<sup>th</sup> out of 228 reporting lenders. The Bank's lending to businesses is significantly lower than its deposit market share. The market share by dollar volume is larger and moves the rank to 23<sup>rd</sup> but remains significantly lower than the deposit market share and rank. The market share and rank would normally be considered poor but is adequate considering the market competition and the small average dollar amount of the loans originated by the top five lenders who are credit card banks with small average sized loans from \$6,000 to \$23,000 dollars compared to Amerant's average loan size of \$358,000. The top five lenders are American Express, Federal Savings Bank (FSB); Bank of America NA; Chase Bank USA NA; CitiBank NA; and Capital One Bank NA. Their total lender share is 67.44 percent.

For small business loans (businesses with revenues of \$1 million or less), Amerant ranks 30<sup>th</sup> out of 228 banks with a market share of approximately 1.0 percent. The rank and lender market share is significantly lower than the deposit market share rank. By dollar volume the Bank rank moves to 20<sup>th</sup> but remains significantly lower than its deposit market share rank. This performance is adequate considering the competition from credit card banks. The top five lenders in the market are American Express, FSB; Wells Fargo NA; Bank of America NA; Chase Bank USA NA; and Citibank NA with total market share of approximately 76.22 percent.

### **Distribution of Loans by Income Level of the Geography**

The Bank exhibits an excellent geographic distribution of loans in its AA.

### ***Home Mortgage Loans***

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans in the full-scope assessment area is good.

For 2016, the Bank's mortgage lending in low-income geographies exceeded the owner-occupied housing units and also exceeded the aggregate lending in low-income geographies. For moderate-income geographies, the Bank's lending was somewhat lower than the owner-occupied geographies but exceeded the aggregate lending in moderate-income geographies.

In 2017-2018, the Bank's mortgage lending in low-income geographies was somewhat lower than the owner-occupied housing units and also somewhat lower than the aggregate lending in low-income geographies. For moderate-income geographies, the Bank's lending was again somewhat lower than the owner-occupied geographies and somewhat lower than the aggregate lending in moderate-income geographies.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent.

For 2016, the Bank's small business lending in low-income geographies was near to the percentage of businesses located in low-income geographies and exceeded the aggregate lending to small businesses in low-income geographies. For moderate income geographies, the Bank's lending exceeded the percentage of small businesses located in moderate-income geographies and also exceeded the aggregate lending in moderate-income geographies.

For 2017-2018, the Bank's small business lending in low-income geographies exceeded the percentage of businesses located in low-income geographies and exceeded the aggregate lending to small businesses in low-income geographies. For moderate income geographies, the Bank's lending exceeded the percentage of small businesses located in moderate-income geographies and also exceeded the aggregate lending to small businesses in moderate-income geographies.

### ***Lending Gap Analysis***

We evaluated the lending distribution of the Bank's AA to determine if any unexplained conspicuous gaps existed. There were no unexplained conspicuous gaps identified after reviewing performance context.

### **Distribution of Loans by Income Level of the Borrower**

The Bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

### ***Home Mortgage Loans***

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the Bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans reflects good distribution among low-and moderate-income individuals in MSA 33100.

For 2016, the Bank's lending to low-income borrowers was significantly lower than the percent of families identified as low-income but was near to the aggregate lending to low-income borrowers. For moderate-income individuals, the Bank's lending was somewhat lower than the percent of families identified as moderate-income but exceeded the aggregate lending to moderate-income individuals.

For 2017-2018, the Bank's lending to low-income borrowers was lower than the percent of families identified as low-income but exceeded the aggregate lending to low-income borrowers. For moderate-income individuals, the Bank's lending was somewhat lower than the percent of families identified as moderate-income and near to the aggregate lending to moderate-income individuals.

### ***Small Loans to Businesses***

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the Bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good in MSA 33100.

For 2016, the Bank's lending to businesses with revenues of \$1 million or less was lower than the percent of businesses identified as having revenues of \$1 million or less and was near to the aggregate lending for these businesses.

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

## **Community Development Lending**

The institution is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

For MSA 33100, the Bank originated a total of 115 CD loans totaling \$340.6 million within the Bank's AA. Included in these loans were 46 affordable housing loans totaling \$85.2 million, 43 loans totaling \$209.4 million to revitalize and stabilize LMI areas, 24 economic development loans totaling \$40.8 million, and two community service loans totaling \$5.2 million. A noteworthy fact and examples were the following:

- All of the qualified affordable housing loans were loans to multi-family apartment complexes that offered rents below the area's Housing and Urban Development (HUD) fair market rents.
- There was a \$22.8 million loan made with the purpose of revitalizing and stabilizing an industrial property located in an enterprise zone and in a moderate-income census tract. The property consists of 41 multi-tenant warehouse buildings housing several small businesses in the community.

- There was also a \$12.1 million affordable housing loan to refinance a multi-family apartment complex with 166 units, all offering rents below the HUD fair market rents for the area. The property is also located in a moderate-income census tract.

## **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Amerant offers more flexible underwriting for loans that have a CRA CD purpose and this had a positive effect on the Lending Test. The Bank is a United States Small Business Administration (SBA) approved lender. The SBA provides guarantees for small business loans and larger commercial loans. This status allows the Bank to increase its SBA loan production while reducing costs through expedited loan processing and self-managing of the Bank's SBA loan portfolio. As an example, the Bank closed a total of 21 SBA loans for a total of approximately \$11 million during 2017. The Bank also offers SBA 504 and SBA 7A programs.

Amerant invests in the Community Reinvestment Group, LC (CRG). This nonprofit is a consortium of financial institutions who have invested in the organization by funding the loan program to benefit other not-for-profits who develop affordable housing. CRG offers a "zero-interest" loan program that provides gap funding until the respective CDC's subsidy funding is in place. CRG has made three loans in 2017 for a total of \$635,000 and four loans in 2018 for a total of \$680,000.

The Bank partnered with the Florida Export Finance Corporation (FEFC). The FEFC was created in 1993 as a not-for-profit corporation with a mandate to expand employment and income opportunities for Florida residents. Financial assistance is the primary service offered by the FEFC. FEFC financial assistance is available to small and medium sized companies registered to do business in the State of Florida; with less than 250 employees and less than a \$6 million net worth; only for direct export transactions; only for goods and services being shipped from Florida. With the assistance of FEFC the Bank renewed two loans in 2018 each for \$500,000.

The Bank also works to extend loans to organizations whose programs provide government subsidized, low-cost mortgages to LMI individuals. Such programs include the Habitat for Humanity in Miami-Dade and Broward counties, Senior Housing Prevention and Florida Community Loan Fund. During the evaluation period the Bank had over \$3 million in loans on the books for these organizations.

## **INVESTMENT TEST**

The Bank's performance under the Investment Test in Florida is rated Outstanding.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the Bank's performance in the MSA 33100 is excellent

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
MSA 33100	121	18,411	156	45,150	277	92.3	63,561	99.0	0	0
Statewide with no P/M/F	5	563	9	72	14	7.7	635	1.0	0	0

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

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Performance in MSA 33100 is excellent when considering the impact of the investments. During the evaluation period, investments and donations totaled \$63.6 million which consisted of 121 prior period investments totaling \$18.4 million, 47 current period investments totaling \$44.2 million, and 109 donations totaling \$963,000. In addition, there were five statewide investments with no purpose, mandate, or function (P/M/F) to serve the AA from the prior period totaling \$563,000, and nine donations in the current period totaling \$72,000.

The Bank's current period qualified investments include mortgage-backed securities that support affordable housing needs for low- and moderate-income residents and Small Business Administration loan pools. Many of the mortgage-backed securities purchased were backed by multifamily projects in low- and moderate-income areas within Miami Dade, Broward, and Palm Beach counties. These provided approximately 2,500 affordable housing units.

### Grants and Donations

The Bank also funded qualified investments in the form of donations and grants to organizations that support LMI individuals and geographic areas. Donations to organizations in the MSA 33100 totaled \$1.0 million through 118 individual donations. The following is a summary of a few organizations that benefited from the Bank's donations:

- \$258,000 to an organization that has been working within the community to build decent, affordable homes in partnership with families in need, volunteers and donors.
- \$60,000 to a CD organization that is dedicated to eliminating housing discrimination and promoting fair housing. Its programs are designed to ensure that people are offered the right to select housing of their choice without discrimination based on race, religion, color, national origin, sex, disability, marital or familial status, or such other protected classes as may be conferred by federal, states, or local laws.
- \$27,500 to a non-profit organization which advocates, develops, and provides affordable housing for the mentally handicapped in Broward county. They acquire old structures that are ready for condemnation, or properties that the county deeds to them, and rehab the houses for living facilities. They provide homeownership training and teach financial skills to increase their clients' knowledge to move them towards self-sufficiency and independence.

## SERVICE TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank's performance in the MSA 33100 is good. The rating is based on the geographic distribution of full-service banking offices and ATMs and the strong commitment to CD services.

### Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
MSA 33110	90.03	15	65.22	0	13.33	26.67	60.00	5.79	28.91	31.47	33.40

Source: 2015 ACS Census & Bank Data; Due to rounding, totals may not equal 100.0; 0.04 percent of the population were not applicable

The Bank's delivery systems are reasonably accessible to all portions of the AA. The Bank has 15 full service branches in the AA. The Bank has no branches in low-income geographies but has two branches in moderate-income areas. No branches in low-income geographies is poor when compared to the population living in low-income geographies. Lending patterns indicate some servicing of low-income geographies. The percentage of the Bank's branch offices located in moderate-income geographies is significantly lower than the percentage of the population within the moderate-income geographies. While the Bank does not have any branches in low-income areas and only has two branches in moderate-income areas, several of the branches are located near to low- or moderate-income areas or are located along major roadways making them accessible to the adjacent low- and moderate-income areas. The Bank offers Internet and mobile banking services, which are available to individuals regardless of geography or income level.



<b>Distribution of Branch Openings/Closings</b>					
Branch Openings/Closings					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp
4	6	0	-1	+2	+1

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

The Bank relocated four branches and closed two branches during the evaluation period. The net effect in the AA was that one branch in a moderate-income tract was closed while two were opened in middle-income tracts and one was opened in an upper-income tract. These changes do not adversely affect the accessibility of delivery systems in low- and moderate-income geographies or to low- and moderate-income individuals because the resulting branch openings are reasonably accessible to the adjacent low- and moderate-income areas. The Bank's CRA Officer reviews any proposed LMI-tract closings to ensure that business rationale supports the necessity of the closure to achieve compelling institutional objectives and any impact on LMI customers is mitigated to the extent possible.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals.

Management complements its traditional service delivery methods with alternative delivery processes, including online banking, mobile banking, and telephone banking. The delivery methods provide increased access to banking services throughout all areas in the AA. The Bank has a network of branded deposit-taking ATMs at all branch locations. The Bank is also a member of local and international ATM networks PRESTO and Allpoint. Allpoint ATMs are available at several retail locations such as Walgreen's, Target, CVS, and Costco.

## **Community Development Services**

The institution is a leader in providing CD services in MSA 33100.

Amerant provides an excellent level of CD services and is a leader in providing CD services in their AAs that are responsive to the needs of the AAs. The Bank's responsiveness is demonstrated by the number of contributed hours, the number of employees actively involved, and the number and diversity of the types of organizations served.

Amerant provides an excellent level of CD services that are responsive to the needs of the community in the AA. Bank officers and employees devoted approximately 3,742 community service hours to 31 different qualifying organizations in the AA. More than 2,100 hours of these services were spent in leadership positions with various organizations throughout the AA. They shared their financial expertise by serving as board members, officers, and on committees, as well as assisting with fundraising efforts.

These activities help provide affordable housing, economic development, revitalization and stabilization of designated areas, and community services to LMI individuals and families. Amerant officers and employees also participated in approximately 731 financial literacy events as leaders, teachers, or facilitators and reached 4,120 participants.

Examples of organizations for which the Bank frequently provides CD services include:

- **Habitat for Humanity for Greater Miami:** This group focuses on providing LMI families with affordable home ownership opportunities in Miami-Dade County area. One of Amerant's senior officers serves on the board of directors for this organization.
- **Haitian American CDC:** This non-profit organization is committed to providing affordable housing for the residence of Little Haiti and in North Miami regions of Miami-Dade counties. Since being formed, this CDC has constructed over 500 single-family homes for low-income families, 130 affordable rental units, and several other similar projects benefiting LMI families. An employee of the Bank serves on the board of directors and the Fund Development Committee where he uses his loan experience and management skills.
- **Miami Beach CDC:** This non-profit housing organization conducts Homebuyer Education workshops for first-time homebuyers and LMI individuals. These classes are provided in English and Spanish. Bank employees conducted 45 workshops, which are 8 hours in length. This workshop had 513 participants.
- **Centro Campesino Farm Worker Center, Inc.:** This non-profit housing organization conducts Homebuyer Education workshops for first time, LMI individuals on behalf of the Bank as part of their grant program. Bank employees conducted 42 workshops, which are eight hours in length. This workshop had 1,194 participants.

## State Rating

### State of Texas

**CRA rating for the State of Texas:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels that reflect good responsiveness to meeting the credit needs of the Bank's assessment area, given performance context,
- A good geographic distribution of loans, given performance context and considering the substantial majority of lending inside the Bank's assessment area,
- An excellent distribution of loans by the income level of the borrower, given performance context,
- The Bank is a leader in making CD loans,
- CD lending that had a significantly positive impact on the overall Lending Test conclusion,
- An excellent level of qualified investments including donations,
- Retail delivery systems accessible to LMI geographies, and
- The Bank is a leader in providing CD services.

### Description of Institution's Operations in Texas

Amerant Bank operates eight full service branches and eight ATMs in the state of Texas. All branches are located in the Houston area. As of December 31, 2018, total deposits in the Bank's TX AA totaled \$655 million or approximately 11.0 percent of the Bank's total deposits. The Bank's market share in MSA 26420 is 0.26 percent and is ranked 27<sup>th</sup> of 83 banks in the AA. JP Morgan Chase, Wells Fargo, Bank of America, Compass Bank, and ZB NA dominate the market with approximately 73.5 percent of the deposits.

The Bank's primary customer base is international, particularly from Venezuela and Mexico. For the TX operations only 2.0 percent or \$12 million of the deposits are from international customers. Domestic deposits totaled approximately \$643 million and represented approximately 98 percent of the TX deposit base.

In 2018, with the change in Home Mortgage Disclosure Act (HMDA), management began reporting Home Equity Lines of Credit (HELOC) that increased the number of HMDA Reportable loans reported in 2018. The reporting of HELOCs affected the Bank's penetration of loans to low-income individuals and loans in low-income geographies. During 2018, 91.13 percent of mortgage loans were HELOCs and only ten percent of these customers were low-or moderate-income individuals. Particularly, low- and some moderate-income individuals do not typically obtain HELOC loans.

Amerant's current objective is to better serve its retail consumers and small businesses through branch expansion. During the first two years of this evaluation period, the Bank purchased loans to support lending in LMI geographies and to LMI people. However, in 2018, the Bank was unable to find loans to purchase.

A community contact was conducted to determine the credit and CD needs. The discussion focused on disaster recovery lessons learned before and after Hurricane Harvey. Critical needs identified were financial literacy programs to help people be better financially prepared for further disasters, make the institution accessible to low-to moderate-income communities when helping to revitalize and stabilize disaster impacted communities, and funding of grants and small dollar loans.

The following table depicts the demographic information for the full scope AA:

### Houston-The Woodlands-Sugar Land, TX MSA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: MSA 26420 Harris-Montgomery-Ft Bend TX</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	921	16.4	29.5	23.0	30.3	0.8
Population by Geography	5,517,279	12.9	27.1	26.0	33.8	0.3
Housing Units by Geography	2,067,422	13.6	26.0	25.1	35.0	0.3
Owner-Occupied Units by Geography	1,110,317	5.8	22.1	27.4	44.6	0.1
Occupied Rental Units by Geography	768,637	22.6	30.8	23.0	23.0	0.6
Vacant Units by Geography	188,468	22.9	29.3	20.3	27.2	0.3
Businesses by Geography	428,232	10.6	19.3	22.3	47.6	0.2
Farms by Geography	6,471	6.3	17.2	26.5	49.8	0.1
Family Distribution by Income Level	1,323,623	25.1	16.2	16.9	41.9	0.0
Household Distribution by Income Level	1,878,954	25.1	16.1	16.8	42.0	0.0
FFIEC Updated MSA Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		\$75,600	Median Housing Value			\$177,463
			Median Gross Rent			\$979
			Families Below Poverty Level			13.3%

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.

Community contacts conducted during the evaluation period with affordable housing organizations in the AA indicate that some of the critical needs include affordable housing, financial literacy classes, disaster recovery assistance, and Internet access for LMI people. Through a banking regulator sponsored listening session attended by grassroots community groups, community development financial institutions (CDFI), national housing groups, local, county and state governments, the United States Department of Housing and Urban Development (HUD), Small Business Administration (SBA), real estate agents, legal aid, area foundations, and sixty-two bankers from thirty-six financial institutions, discussions focused on disaster recover lessons learned before and after Hurricane Harvey. Critical needs identified were financial literacy programs to help people be better financially prepared for further disasters, make the institution accessible to low-to moderate-income communities when helping to revitalize and stabilize disaster impacted communities, and funding of grants and small dollar loans.

The AA has a high poverty level at 13.3 percent and high housing costs, and community contacts also emphasized the need for higher wages. The Federal Financial Institutions Examination Council (FFIEC) estimated a median family income for MSA 26420 of \$75,600 based on the American Community Survey (ACS) for the 2015 Census update. Considering the median family income and the high poverty level in the AA, LMI families have difficulty affording mortgage payments without subsidies given the high housing costs and added costs of insurance and taxes. Based on the median family income, low-income is considered less than 50 percent of the median family income which would be an income of less than \$37,800 per year. Moderate income is less than 80 percent of the median income but not less than 50 percent of the median family income or \$60,480. LMI renters, particularly low-income, also need rental subsidies to assist with rental payments. According to the 2015 ACS Census, approximately 12.6 percent of households spend more than 30 percent of their income for mortgage payments, and approximately 17.0 percent of households spend more than 30 percent of their income for rental payments.

According to Dunn and Bradstreet, there were 428,232 non-farm businesses in the AA for 2018, of which approximately 85.4 percent are considered small business. Small businesses are defined as having revenues of \$1 million or less.

The banking industry in the AA is very competitive for loans, deposits, and investments, as well as CRA CD opportunities. There are branches of nationwide and regional banks, local community banks, mortgage companies, credit unions, and other nonbank financial service providers.

Investment opportunities are highly competitive in this AA with banks purchasing investments to support affordable housing for LMI individuals/geographies and small business lending. Many community banks tend to purchase mortgage backed securities with home mortgages to LMI people or loans in LMI geographies, affordable housing multifamily properties, or Small Business Administration loan pools in their AAs. The opportunity to make donations/grants to qualifying organizations that have missions that support the CRA CD purpose are available. CD lending opportunities are available in the AA including opportunities to partner with nonprofit organizations that have a CD mission or purpose. There are numerous nonprofit organizations located in the AA that provide various services to LMI people or small businesses, such as affordable housing opportunities, financial literacy training, support for economic development activities, and more.

## Scope of Evaluation in Texas

Amerant’s assessment area in the state of Texas includes a portion of Metropolitan Statistical Area (MSA) 26420 defined as Houston-The Woodlands-Sugarland, TX. The Bank’s partial MSA consists of Harris, Montgomery, and Fort Bend counties. This MSA received a full-scope review.

Loan products evaluated include home mortgage and multi-family loans reported under the HMDA and small loans to businesses reported under the CRA. Small loans to farms are not a major product for the Bank and the Bank reported no small loans to farms. Of the total Bank loan originations for home mortgage and small business loans, originations in MSA 26420 by number represent approximately 23.0 percent and 18.5 percent, respectively. By dollar amount, originations in MSA 26420 for home mortgage and small business loans compared to total Bank originations totaled 29.7 percent and 18.8 percent, respectively.

Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

### LENDING TEST

The Bank’s performance under the Lending Test in Texas is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank’s performance in the Houston-The Woodlands-Sugar Land, TX MSA is excellent.

### Lending Activity

Lending levels reflects good responsiveness to AA credit needs.

Based on the data in Lending Volume Tables O, P, Q, and R and the following performance context considerations, we concluded that lending activity is adequate. The Bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, market presence, and business strategy.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
MSA 26420	201	114	0	32	347	100%	100%
Broader/Statewide no P/M/F	0	0	0	4	4	0	0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
MSA 26420	236,501	39,961	0	158,784	435,246	100%	100%
Broader/Statewide no P/M/F	0	0	0	5,773	5,773	0	0

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Local competition is strong and consists of numerous national and state community banks, mortgage lenders, credit unions, non-banking financial entities, and branches of large, nationwide banks that offer a wide variety of home mortgage loan products and small business loans.

Amerant's lending activity in MSA 26420 is adequate when considering the Bank's business strategy and loan competition. Home mortgage lending activity and small business activities are adequate.

### ***Home Mortgage Loans***

Based upon FDIC Deposit Market Share data as of June 30, 2018, Amerant achieved a 0.28 percent share of deposits, ranking 27<sup>th</sup> among 83 financial institutions in the MSA. Based upon 2017 Peer Mortgage Data which is the most recent available information, Amerant achieved a 0.04 percent lender market share of home loans, ranking 254 among 931 reporting lenders. Amerant's lender share of home mortgage loans is significantly lower than its deposit market share. This performance would normally be considered poor but is considered adequate given the Bank competes with some of the largest mortgage companies, non-deposit taking financial entities, credit unions, and banks with a nationwide presence and a wide selection of mortgage products. The top five mortgage lenders had 23.29 percent of the total lender market share. The top five lenders were Wells Fargo Bank NA, JPMorgan Chase Bank NA, Quicken Loans, Nationstar Mortgage, and Cornerstone Home Lending, Inc.

### ***Small Loans to Businesses***

Amerant achieved a 0.02 percent market share of small loans to businesses, ranking 80<sup>th</sup> among 214 reporting lenders. The Bank's small business lending is significantly lower than its deposit market share and rank. This performance would normally be considered very poor but is considered adequate given the Bank competes with some of the largest lenders and the average loan size. The five largest lenders dominate the market with 61.04 percent of the lender share with average loan sizes range from \$8,000 to \$49,000 compared to Amerant's average loan size of \$434,000. The top five lenders are American Express FSB, Chase Bank USA NA, Bank of America NA, Wells Fargo Bank NA and Capital One Bank NA.

For small business loans (businesses with revenues of \$1 million or less), Amerant ranks 47<sup>th</sup> out of 214 banks with a market share of approximately .02 percent by count of loans. The rank is somewhat lower than the deposit rank and the lender market share is significantly lower than the deposit market share. By dollar volume the Bank rank moves to 38<sup>th</sup> and is near the deposit market share rank. This performance is adequate considering the competition from credit card banks. The top five lenders in the market are American Express FSB, Chase Bank USA NA, Bank of America NA, Wells Fargo NA, and Citibank NA with a total market share of approximately 73.6 percent.

## **Distribution of Loans by Income Level of the Geography**

The Bank exhibits good geographic distribution of loans in MSA 26420.

### ***Home Mortgage Loans***

Refer to Table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the Bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans in the full-scope assessment area is adequate.

For 2016, the Bank had no loans in in low-income geographies and this performance is significantly lower for both the owner-occupied housing units and the aggregate lending in low-income geographies. For moderate-income geographies, the Bank's lending was near to the owner-occupied geographies and exceeded aggregate lending in moderate-income geographies.

In 2017-2018, the Bank's mortgage lending in low-income geographies was lower than the owner-occupied housing units and somewhat lower than the aggregate lending in low-income geographies. For moderate-income geographies, the Bank's lending was somewhat lower than the owner-occupied geographies and near to the aggregate lending in moderate-income geographies.

### ***Small Loans to Businesses***

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the Bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is excellent.

For 2016, the Bank's small business lending in low-income geographies exceeded the percentage of businesses located in low-income geographies and exceeded the aggregate lending to small businesses in low-income geographies. For moderate income geographies, the Bank's lending was somewhat lower than the percentage of small businesses located in moderate-income geographies and also somewhat lower than aggregate lending in moderate-income geographies.

For 2017-2018, the Bank's small business lending in low-income geographies exceeded the percentage of businesses located in low-income geographies and exceeded the aggregate lending to small businesses in low-income geographies. For moderate income geographies, the Bank's lending exceeded the percentage of small businesses located in moderate-income geographies and also exceeded the aggregate lending to small businesses in moderate-income geographies.

### ***Lending Gap Analysis***

We evaluated the lending distribution of the Bank's AA to determine if any unexplained conspicuous gaps existed. There were no unexplained conspicuous gaps identified after reviewing performance context.



## **Distribution of Loans by Income Level of the Borrower**

The Bank exhibits an excellent distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

### ***Home Mortgage Loans***

Refer to Table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the Bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans reflects excellent distribution among low-and moderate-income individuals in MSA 26420.

For 2016, the Bank's lending to low-income borrowers was somewhat lower than the percent of families identified as low-income but exceeded the aggregate lending to low-income borrowers. For moderate-income individuals, the Bank's lending exceeded the percent of families identified as moderate-income and the aggregate lending to moderate-income individuals.

For 2017-2018, the Bank's lending to low-income borrowers was lower than the percent of families identified as low-income but exceeded the aggregate lending to low-income borrowers. For moderate-income individuals, the Bank's lending was near to the percent of families identified as moderate-income and exceeded the aggregate lending to moderate-income individuals.

### ***Small Loans to Businesses***

Refer to Table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the Bank's origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good in MSA 26420.

For 2016, the Bank's loans to businesses with revenue less than or equal to \$1 million was somewhat lower than the percent of businesses identified as having revenues less than or equal to \$1 million but exceeded the aggregate lending for these businesses.

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

## **Community Development Lending**

The institution is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the CD evaluation period, the Bank originated 36 CD loans totaling \$164.6 million which includes four Broader Statewide loans totaling \$5.8 million with no purpose, mandate, or function to serve the MSA 2620 AA.

During the CD evaluation period, the Bank originated 32 CD loans totaling \$158.8 million within the Bank's AA consisting of 10 affordable housing loans totaling \$57.9 million, 12 economic development loans totaling \$16.9 million, and 10 loans totaling \$84 million to revitalize and stabilize LMI areas. A noteworthy fact and examples were the following:

- All of the qualified affordable housing loans were loans to multi-family apartments complexes where rents were below Housing and Urban Development's (HUD) fair market rents.
- There was a \$42.6 million loan located in an enterprise zone to revitalize and stabilize a property located in a moderate-income census tract.
- There was also a \$1.2 million economic development loan to a daycare center that receives subsidies from the state through the Texas Workforce Commission for providing childcare services to LMI families.

### **Broader Statewide – Texas**

In addition to qualified CD loans originated within the Bank's AA, Amerant originated four loans totaling \$5.8 million in the broader statewide with no purpose, mandate, or function to serve the AA. The loans consisted of three affordable housing loans totaling \$3.5 million and one loan totaling \$2.3 million to revitalize and stabilize an LMI area. All affordable housing loans were loans to apartment complexes where rents were below HUD's fair market rents. There was a \$2.3 million loan located in a moderate-income census tract and is within an Enterprise Zone. The Bank received positive consideration for these CD loans since it met the needs of its delineated AA.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

Amerant offers more flexible underwriting for loans that have a CRA CD purpose and this had a positive effect on the Lending Test. The Bank is a United States Small Business Administration (SBA) approved lender. The SBA provides guarantees for small business loans and larger commercial loans. This status allows the Bank to increase its SBA loan production while reducing costs through expedited loan processing and self-managing of the Bank's SBA loan portfolio. These processes had a positive impact on the Lending Test rating. The Bank also offers SBA 504 and SBA 7A programs. During the evaluation period, Amerant reported three Community Development SBA loans: one 7A loan totaling \$1.5 million and two SBA 504 loans totaling approximately \$2.6 million.

### **INVESTMENT TEST**

The Bank's performance under the Investment Test in Texas is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank's performance in the MSA 26420 is excellent.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
MSA 26420	10	5,186	62	30,968	39	100.0	36,154	100.0	0	0

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

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Performance in MSA 26420 is excellent when considering the impact of the investments. During the evaluation period, investments and donations totaled \$36.2 million which consisted of 10 prior period investments totaling \$5.2 million, 29 current period investments totaling \$30.6 million, and 33 donations totaling \$405,000.

The Bank purchased 26 pools of mortgage-backed securities and small business pools totaling more than \$26.3 million, for a total of 873 units of affordable housing.

## Grants and Donations

The Bank also funded qualified investments in the form of donations and grants to organizations that support LMI individuals and geographic areas. Donations to organizations in the MSA 26420 totaled \$405,065 through 33 individual donations. The following is a summary of a few organizations that benefited from the Bank's donations:

- \$186,315 to non-profit business organizations consisting of entrepreneurs of Latin American origin. Members vary from small local businesses to larger corporations making 95 percent of its members, business owners. Their platform is based on education, unity, motivation, and information.
- \$27,500 to an organization that helps women and girls make choices toward becoming independent, productive and financially stable. In their programs, women acquire the essential financial knowledge, skills and confidence they need to make sound decisions and improve their lives, for themselves and for generations to come.
- \$25,000 to an organization that provides Financial and Homebuyer Counseling and Education, Foreclosure Intervention Counseling, Reverse Mortgage Counseling, Financial Coaching and outreach services to all segments of our community, especially the LMI income, who seek information and assistance in entering or re-entering the credit mainstream.

**SERVICE TEST**

The Bank’s performance under the Service Test in Texas is rated High Satisfactory.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the Bank’s performance in the MSA 26420 is good.

**Retail Banking Services**

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
MSA 26420	9.97	8	34.78	0	0	4	4	12.87	27.07	25.95	33.76

The Bank’s delivery systems are reasonably accessible to all portions of the AA. The Bank has eight full service branches in the AA. The Bank has no branches in low- or moderate-income geographies. The percentage of the Bank’s branch offices located in low- and moderate-income geographies is lower than the percentage of population within those geographies. While the Bank does not have any branches in low- or moderate-income areas, several of the branches are located near to low- or moderate-income areas or are located along major roadways making them accessible to the adjacent low- and moderate-income areas. Additionally, the Bank offers Internet and mobile banking services, which are available to individuals regardless of geography or income level.

Distribution of Branch Openings/Closings					
Branch Openings/Closings					
# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
		Low	Mod	Mid	Upp
3	0	0	0	+2	+1

To the extent changes have been made, the institution’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

The Bank continues to open branches in the Texas market. It opened three branches during the evaluation period and did not close any branches. These changes do not adversely affect the accessibility of delivery systems in low- and moderate-income geographies or to low- and moderate-income individuals. While the branches are not located in low- or moderate-income areas, they are reasonably accessible to the adjacent low- and moderate-income areas. The Bank's CRA Officer reviews any proposed LMI-tract closings to ensure that business rationale supports the necessity of the closure to achieve compelling institutional objectives and any impact on LMI customers is mitigated to the extent possible.

Services, including where appropriate business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals.

Management complements its traditional service delivery methods with alternative delivery processes, including online, mobile, and telephone banking. The delivery methods provide increased access to banking services throughout all areas in the AA. The Bank has a network of branded deposit-taking ATMs at all branch locations. The Bank is also a member of local and international ATM networks PRESTO and Allpoint. Allpoint ATMs are available at several retail locations such as Walgreen's, Target, CVS, and Costco.

## **Community Development Services**

The institution is a leader in providing CD services.

Amerant provides an excellent level of CD services and is a leader in providing CD services in their AAs that are responsive to the needs of the AAs. The Bank's responsiveness is demonstrated by the number of contributed hours, the number of employees actively involved, and the number and diversity of the types of organizations served.

MSA 26420 Harris, Montgomery, Fort Bend

Amerant provides an excellent level of CD services that are responsive to the needs of the community in the AA. Bank officers and employees devoted approximately 1,454 community service hours to seven different qualifying organizations in the AA. More than 237 hours of these services were spent in leadership positions with various organizations throughout the AA. They shared their financial expertise by serving as board members, officers, and on committees, as well as assisting with fundraising efforts. These activities help provide affordable housing, economic development, revitalization and stabilization of designated areas, and community services to LMI individuals and families. Amerant officers and employees also participated in approximately 335 financial literacy events as leaders, teachers, or facilitators and reached 6,273 participants.

Examples of organizations for which the Bank frequently provides CD services include:

**Credit Coalition:** The Credit Coalition is a nonprofit organization whose membership includes financial institutions, community organizations, and other related businesses. The Bank has several volunteers teach the FREE 6-week, 15-hour comprehensive educational series, "Fundamentals of Good Credit". The Credit Coalition is a Reverse Mortgage Education Project Participating Agency, counseling seniors interested in reverse mortgages. The Credit Coalition has partnered with the "Bank on Houston" program which is designed to help consumers without a primary banking relationship gain

access to basic financial services. An officer of the Bank attends the quarterly member meetings and provides her banking expertise to this group. Bank employees conducted 51 workshops, which are 2.5 hours in length. In our review period, this workshop had 1,460 participants.

**Camara de Empresario Latinos de Houston:** An officer of the Bank's Houston AA serves in a leadership position for this organization by serving as a director. This non-profit's mission is to educate and support small business owners by helping them develop and promote their companies to create a mark in the small business community and noticeable growth in their business.

**The Women's Resource of Greater Houston:** The mission of this non-profit is to help women and girls make choices toward becoming independent, productive, and financially stable. They assist the women and girls of the community become financially literate, productive, and self-sufficient. Bank employees conducted 194 workshops, which are one hour in length. In our review period, this workshop had 3,245 participants.

## 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 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”.

<b>Time Period Reviewed:</b>	01/01/16 to 12/31/18 for loans and Community Development loans 4/11/16 to 12/31/18 for Qualified Investments and CD Services	
<b>Bank Products Reviewed:</b>	Residential Mortgage Loans Small Loans to Businesses Community Development Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Florida</b>		
MSA 33100 Miami-Fort Lauderdale-West Palm Beach, FL MSA	Full-scope	Miami-Dade, Broward, and Palm Beach Counties
<b>Texas</b>		
MSA 26420 Houston-The Woodlands-Sugar Land, TX	Full-scope	Harris, Montgomery, and Fort Bend Counties

## Appendix B: Summary of MMSA and State Ratings

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RATINGS Amerant Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Amerant Bank, National Association	Outstanding	Outstanding	High Satisfactory	Outstanding
State:				
Florida	Outstanding	Outstanding	High Satisfactory	Outstanding
State:				
Texas	Outstanding	Outstanding	High Satisfactory	Outstanding

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.



## 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 §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**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.

**MMSA (state):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table 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.

<b>Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2016</b>
<b>Assessment Area:</b>	<b>Total Home Mortgage Loans</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% of Owner-Occupied Housing Units</b>	<b>% Bank Loans</b>	<b>Aggregate</b>
MSA 26420 TX	36	98,306	20.3	161,271	4.4	0.0	1.8	21.6	19.4	10.8	29.0	36.1	29.2	45.0	44.4	58.2	0.0	0.0	0.0
MSA 33100 FL	141	122,150	79.7	145,423	2.1	4.3	1.2	23.1	17.0	16.8	36.3	26.2	36.9	38.6	51.8	45.0	0.0	0.7	0.1
<b>Total</b>	<b>177</b>	<b>220,456</b>	<b>100.0</b>	<b>306,694</b>	<b>3.1</b>	<b>3.4</b>	<b>1.5</b>	<b>22.5</b>	<b>17.5</b>	<b>13.6</b>	<b>33.1</b>	<b>28.2</b>	<b>32.9</b>	<b>41.4</b>	<b>50.3</b>	<b>51.9</b>	<b>0.0</b>	<b>0.6</b>	<b>0.1</b>

*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** **2017-18**

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
MSA 26420 TX	164	137,930	23.6	144,793	5.8	1.8	2.7	22.1	12.2	13.9	27.5	18.3	28.0	44.6	67.7	55.3	0.1	0.0	0.1
MSA 33100 FL	531	439,342	76.4	140,541	2.6	1.3	2.3	23.2	13.0	20.5	32.9	25.8	34.1	41.2	58.8	42.8	0.2	1.1	0.4
<b>Total</b>	<b>695</b>	<b>577,272</b>	<b>100.0</b>	<b>285,334</b>	<b>4.1</b>	<b>1.4</b>	<b>2.5</b>	<b>22.6</b>	<b>12.8</b>	<b>17.2</b>	<b>30.3</b>	<b>24.0</b>	<b>31.0</b>	<b>42.8</b>	<b>60.9</b>	<b>49.1</b>	<b>0.1</b>	<b>0.9</b>	<b>0.2</b>

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 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
MSA 26420 TX	36	98,306	20.3	161,271	24.3	16.7	2.5	16.6	38.9	11.0	17.4	11.1	17.3	41.7	22.2	50.5	0.0	11.1	18.7
MSA 33100 FL	141	122,150	79.7	145,423	22.4	2.1	2.2	17.3	12.1	9.6	18.9	3.5	17.6	41.3	32.6	53.7	0.0	49.6	16.8
<b>Total</b>	<b>177</b>	<b>220,456</b>	<b>100.0</b>	<b>306,694</b>	<b>23.3</b>	<b>5.1</b>	<b>2.4</b>	<b>17.0</b>	<b>17.5</b>	<b>10.3</b>	<b>18.2</b>	<b>5.1</b>	<b>17.5</b>	<b>41.5</b>	<b>30.5</b>	<b>52.0</b>	<b>0.0</b>	<b>41.8</b>	<b>17.8</b>

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



<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017-18</b>	
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	
MSA 26420 TX	164	137,930	23.6	144,793	25.1	9.8	3.6	16.2	15.2	12.6	16.9	7.3	19.0	41.9	61.0	46.3	0.0	6.7	18.5	
MSA 33100 FL	531	189,592	76.4	140,541	23.1	3.2	2.6	17.0	9.2	10.6	17.7	10.9	18.9	42.2	58.2	50.9	0.0	18.5	17.0	
<b>Total</b>	<b>695</b>	<b>327,522</b>	<b>100.0</b>	<b>285,334</b>	<b>24.1</b>	<b>4.7</b>	<b>3.1</b>	<b>16.6</b>	<b>10.6</b>	<b>11.6</b>	<b>17.3</b>	<b>10.1</b>	<b>18.9</b>	<b>42.0</b>	<b>58.8</b>	<b>48.6</b>	<b>0.0</b>	<b>15.7</b>	<b>17.8</b>	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2016</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
MSA 26420 TX	50	16,753	21.3	140,606	8.5	20.0	8.0	19.4	10.0	18.3	24.4	38.0	24.5	47.7	32.0	49.2	0.1	0.0	0.0	
MSA 33100 FL	185	58,592	78.7	242,848	3.4	3.2	3.2	21.8	32.4	20.5	30.3	16.2	28.5	43.7	47.0	46.8	0.9	1.1	0.9	
<b>Total</b>	<b>235</b>	<b>75,345</b>	<b>100.0</b>	<b>383,454</b>	<b>5.1</b>	<b>6.8</b>	<b>5.0</b>	<b>21.0</b>	<b>27.7</b>	<b>19.7</b>	<b>28.2</b>	<b>20.9</b>	<b>27.0</b>	<b>45.1</b>	<b>43.8</b>	<b>47.7</b>	<b>0.6</b>	<b>0.9</b>	<b>0.6</b>	
<i>Source: 2016 D&amp;B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0</i>																				

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017-18**

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
MSA 26420 TX	64	23,208	16.8	134,566	10.6	10.9	10.7	19.3	29.7	19.2	22.3	25.0	22.8	47.6	34.4	47.1	0.2	0.0	0.2
MSA 33100 FL	317	113,683	83.2	226,331	4.3	5.4	4.6	21.9	28.1	21.4	28.2	19.2	27.3	44.4	43.8	45.5	1.2	3.5	1.2
<b>Total</b>	<b>381</b>	<b>136,891</b>	<b>100.0</b>	<b>360,897</b>	<b>6.5</b>	<b>6.3</b>	<b>6.9</b>	<b>21.0</b>	<b>28.3</b>	<b>20.6</b>	<b>26.1</b>	<b>20.2</b>	<b>25.6</b>	<b>45.5</b>	<b>42.3</b>	<b>46.1</b>	<b>0.9</b>	<b>2.9</b>	<b>0.8</b>

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2016</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
MSA 26420 TX	50	16,753	21.3	140,606	85.3	52.0	40.6	6.0	48.0	8.8	0.0
MSA 33100 FL	185	58,592	78.7	242,848	90.7	44.3	48.5	3.8	55.7	5.5	0.0
<b>Total</b>	<b>235</b>	<b>75,345</b>	<b>100.0</b>	<b>383,454</b>	<b>88.8</b>	<b>46.0</b>	<b>45.6</b>	<b>4.6</b>	<b>54.0</b>	<b>6.6</b>	<b>0.0</b>
<i>Source: 2016 D&amp;B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0</i>											

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2017-18</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
MSA 26420 TX	64	23,208	16.8	134,566	85.4	51.6	45.7	6.0	48.4	8.7	0.0
MSA 33100 FL	317	113,683	83.2	226,331	90.6	52.4	52.9	4.0	47.6	5.3	0.0
<b>Total</b>	<b>381</b>	<b>136,891</b>	<b>100.0</b>	<b>360,897</b>	<b>88.8</b>	<b>52.2</b>	<b>50.2</b>	<b>4.7</b>	<b>47.8</b>	<b>6.5</b>	<b>0.0</b>
<i>Source: 2018 D&amp;B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0</i>											