



PUBLIC DISCLOSURE

May 20, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Continental National Bank
Charter Number 16325

1801 SW First Street
Miami, FL 33135

Office of the Comptroller of the Currency

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

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated Outstanding

The lending test is rated: Outstanding

The community development test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on the excellent distribution of loans in low- and moderate-income (LMI) geographies, a reasonable distribution of lending among businesses of different sizes, a substantial majority of loans purchased or originated are in the assessment area (AA), and a reasonable loan-to-deposit (LTD) ratio.
- The Community Development (CD) Test rating is based on the excellent responsiveness to CD needs in the AA through CD lending, qualified investments, and CD services in the AA.

Loan-to-Deposit Ratio

Considering the Bank's size, financial condition, and credit needs of the AA, the Bank's LTD ratio is reasonable. The LTD ratio is calculated on a bank-wide basis. The average quarterly LTD ratio for the Bank during the evaluation period was 69.8 percent. The quarterly average LTD ratio for three banks similar in size was 97.7 percent with the LTD ratio ranging from a high of 105.4 percent to a low of 88.8 percent. The Bank's LTD ratio has been historically lower due to a strong deposit base. Peer banks used in the analysis reported total assets less than \$500 million and had a strategic focus on small business lending. The banks included two banks in Miami-Dade County (Executive National Bank and Eastern National Bank), and one bank in Palm Beach County (Legacy Bank of Florida).

Lending in Assessment Area

A substantial majority of the Bank's loans are inside its AA. The Bank originated and purchased 97.5 percent of its total loans inside the Bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This conclusion is based on a random sample of 40 business loans that were originated in 2016, 2017 and 2018. The following table depicts the Bank's lending in the AA during the evaluation period.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	39	97.5	1	2.5	40	14,101	97.0	443	3.0	14,544
Total	39	97.5	1	2.5	40	14,101	97.0	443	3.0	14,544

Description of Institution

Continental National Bank (CNB) is a minority-owned intrastate commercial bank established in 1974 and headquartered in Miami, Florida in the Little Havana neighborhood. The Bank was the first Cuban-American community bank established in the United States. CNB is owned by Continental Bancorporation, a one-bank holding company also headquartered in Miami with consolidated assets of \$464.5 million.

As of December 31, 2018, the Bank had total assets of \$464.5 million, total loans of \$342.3 million, total deposits of \$390.6 million, and tier one capital of \$37.8 million. Total loans represent approximately 73.7 percent of assets. CNB's loan portfolio is comprised of commercial real estate loans (61.5 percent), commercial and industrial loans (3.2 percent), residential mortgage loans (29.0 percent), and consumer loans (6.3 percent). Multifamily housing represents 12.2 percent of total loans. CNB offers a wide variety of deposit and loan products, as detailed in the Bank's Public File. The Bank's primary business strategy includes commercial lending, with a focus on real estate development.

During the evaluation period, CNB operated six banking offices within Miami-Dade County that include automated teller machines (ATMs). The Bank closed one branch in an upper income geography in 2016 leaving two branches in moderate-income geographies and three branches in middle-income geographies.

There are no legal or other factors that impede the Bank's ability to meet the credit needs in its AA. The Bank's rating at its preceding CRA examination, dated May 2, 2016, was "Outstanding".

CNB has designated Miami-Dade County as its AA. This AA, which is equivalent to Metropolitan Division (MD) 33124, meets the requirements of the CRA regulation and does not arbitrarily exclude LMI geographies. MD 33124 is part of the Metropolitan Statistical Area (MSA) 33100 Miami-Fort Lauderdale-West Palm Beach that includes Miami-Dade, Broward, and Palm Beach Counties.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated the CRA performance of CNB using Intermediate Small Bank performance criteria. Our evaluation covered the period from May 2, 2016, through December 31, 2018. We focused on lending activity from January 1, 2016, through December 31, 2018, for analysis purposes. The Bank's strategic focus is business lending. Consistent with the Bank's primary lending focus, small loans to businesses were sampled. Home mortgage lending is not a primary product for the Bank and is mostly investor properties or accommodation loans, and these loans were not included in our analysis.

Selection of Areas for Full-Scope Review

In each state where the Bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, Bank delineated AAs located within the same 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 for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The Bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings. CNB has one AA and one primary product that received consideration.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Florida

CRA rating for the State of Florida¹: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The geographic distribution of loans exhibits an excellent distribution of loans in LMI geographies,
- The distribution of loans among businesses of different sizes is reasonable,
- A substantial majority of loan originations are within the Bank's AA,
- The Bank's loan-to-deposit ratio was reasonable over the evaluation period, and
- The responsiveness to CD needs in the AA through CD lending, qualified investments, and CD services in the AA is excellent.

Description of Institution's Operations in Florida

The Bank operates in one AA in the State of Florida as described in the Description of the Institution and the Scope of Evaluation sections of this Performance Evaluation. The Bank's primary business focus is business lending. The Bank's competitors include other local community banks in its markets and some of the largest banks that have a nationwide footprint as well as credit unions and nonbank financial entities that compete for residential and business loans.

Community credit needs in the full-scope AAs were determined by reviewing recent housing and demographic information, as well as CRA performance evaluations from other banks operating in the Bank's AAs. Three community contacts in Miami made during the evaluation period indicated that the most critical needs were affordable housing, small business lending, and financial literacy. Two of the contacts were nonprofit organizations, and the third was from a local bank forum that involved nine local community groups.

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

The following tables depict the demographic information for the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: MD 33124- Miami-Dade County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	518	5.8	27.8	29.0	34.2	3.3
Population by Geography	2,639,042	5.5	29.7	30.9	33.2	0.7
Housing Units by Geography	998,833	5.3	27.5	29.3	37.2	0.6
Owner-Occupied Units by Geography	452,826	2.0	21.4	31.9	44.4	0.2
Occupied Rental Units by Geography	389,327	9.6	37.8	28.2	23.5	0.8
Vacant Units by Geography	156,680	4.3	19.4	24.6	50.4	1.3
Businesses by Geography	346,484	3.1	21.3	25.8	47.5	2.4
Farms by Geography	4,202	3.4	21.9	26.6	47.3	0.8
Family Distribution by Income Level	572,388	24.0	16.6	16.9	42.5	0.0
Household Distribution by Income Level	842,153	26.1	15.1	15.9	42.9	0.0
Median Family Income MD - 33124 Miami-Miami Beach-Kendall, FL MD		\$49,264	Median Housing Value			\$244,010
			Median Gross Rent			\$1,155
			Families Below Poverty Level			16.9%
<i>Source: 2015 ACS Census and 2018 D&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 16.9 percent of the families living below the poverty level. According to the Bureau of Labor Statistics, the State of Florida and Miami-Dade County unemployment rates during the evaluation period have decreased as illustrated in the table below. Miami-Dade County's unemployment rate continues to be higher than the state of Florida's rate and generally higher than the national rate with the exception of December 2018.

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

United States Bureau of Labor Statistics

Given the economic improvements, housing and rental prices have increased. The 2015 ACS Census estimates the median value of owner-occupied housing units in Miami-Dade County to be \$244,010. The rents are also high for rental properties in the AA. The median monthly gross rent is \$1,155.

The Federal Financial Institutions Examination Council (FFIEC) estimated a median family income for MSA 33100 of \$52,300 based on the American Community Survey (ACS) for the 2015 Census update. At the MD level the median family income is less at \$49,264. Considering the median family income and the high poverty level in the AA, LMI families have difficulty 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 \$26,150 per year. Moderate income is less than 80 percent of the median income but not less than 50 percent of the median family income or \$41,840. LMI renters, particularly low-income, also need rental subsidies to assist with rental payments. According to the 2015 ACS Census, 18.39 percent of households spend more than 30 percent of their income for mortgage payments, and 24.09 percent of households spend more than 30 percent of their income for rental payments.

According to Dunn and Bradstreet, as of June 2018, there were 346,484 non-farm businesses in the AA 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 majority (73.3 percent) of all non-farm businesses are concentrated in the County's middle- and upper-income geographies. Major industries include healthcare, real estate development, trade business with Latin America, and tourism. The five largest employers in the AA include Publix Super Markets (38,241 employees), Baptist Health South Florida (16,191 employees), University of Miami (14,664 employees), Tenet Health Corporation (12,170 employees), and Jackson Health System of Miami (11,410 employees).

The banking industry in the AA is very competitive for loans, deposits, and investments, as well as CRA CD opportunities. There are several branches of nationwide and regional banks, local community banks, credit unions, and other nonbank financial service providers. The top five small business lenders in the AA hold a large lender market share of 78.6 percent and are credit card banks with a nationwide presence and an average loan size of \$12,000. These lenders are American Express, Citibank, National Association (NA); Bank of America, NA; Chase Bank, NA; and Wells Fargo Bank, NA.

A review of June 30, 2018 Deposit Market Share data from the Federal Deposit Insurance Corporation (FDIC) indicates that the five largest deposit market share institutions (Bank of America, NA; Wells Fargo, NA; Citibank, NA; J.P. Morgan Chase, NA; and City National Bank of Florida) operating in the AA hold approximately 52.0 percent of the AA deposits. Four of the top five banks have a nationwide presence and one is a local community bank. These five institutions have 286 offices within the AA.

For all the banks in the AA, there are 63 banks with 649 offices. CNB ranks thirty-fourth in deposit market share at approximately 0.3 percent. Competition for loans is even more intense since numerous mortgage companies also operate in the AA and national credit card lenders compete for small business loans.

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

As discussed earlier, the Bank has one AA that is MD 33124 Miami-Miami Beach-Kendall, FL or Miami-Dade County. The AA is also part of MSA 33100 Miami-Fort Lauderdale-Palm Beach, FL that is comprised of Miami-Dade, Broward, and Palm Beach Counties. The AA received a full scope review. The geographic and borrower analyses are conducted at the MSA level rather than the MD level. Refer to the table in appendix A for a list of all AAs under review. The Bank's strategic focus is business lending. Consistent with the Bank's primary lending focus, small loans to businesses were sampled and analyzed. Home mortgage lending is not a primary product for the Bank and is mostly investor properties or accommodation loans, and these loans were not included in our analysis.

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN Florida

LENDING TEST

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

Based on a full-scope review, the Bank's lending performance in the state of Florida is excellent.

Distribution of Loans by Income Level of the Geography

The Bank exhibits an excellent geographic distribution of loans in the state.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses reflects excellent distribution throughout the AA.

For 2016, the Bank's small business lending for both LMI geographies exceeded the percent of businesses located in LMI geographies. For both LMI geographies, the Bank's lending exceeded both the aggregate lending in LMI geographies.

For 2017-2018, the Bank's small business lending for both LMI geographies exceeded the percent of businesses located in LMI geographies. For both LMI geographies, the Bank's lending exceeded both the aggregate lending in LMI geographies.

Lending Gap Analysis

The Bank's small business loan originations in low- and moderate-income geographies during the evaluation period did not reflect any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

The Bank exhibits a reasonable distribution of loans to businesses of different sizes, given the product lines offered by the Bank.

Small Loans to Businesses

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

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

For 2016, 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.

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 was near to the aggregate lending for these businesses.

Responses to Complaints

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

COMMUNITY DEVELOPMENT TEST

The Bank's performance under the Community Development Test in the state of Florida is rated Outstanding.

Based on a full-scope review, the Bank exhibits excellent responsiveness to community development needs in the Miami-Dade AA through community development loans, qualified investments, and community development services, as appropriate, considering the Bank's capacity and the need and availability of such opportunities for community development in the Bank's AA.

Number and Amount of Community Development Loans

Refer to the Lending Activity tables below for the facts and data used to evaluate the Bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
MSA 33100 (partial)	8	100	14,800	100
Regional With No Purpose/Mandate/Function To Serve The AA	1	100	1,050	100

CNB originated an excellent level of community development loans. During the evaluation period, CNB originated 8 loans totaling \$14.8 million. Qualified community development loans included loans providing affordable housing as well as Small Business Administration loans supporting small business needs. Both affordable housing and small business needs are critical needs in the Miami-Dade AA. In addition, CNB made 1 loan in the broader statewide and regional area that provides affordable housing in the amount of approximately \$1.1 million. Affordable housing is also a critical need in the neighboring Broward County.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
MSA 33100 (partial)	3	\$1,928	22	\$1,464	25	100%	\$3,392	100%	0	0-

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

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

The Qualified Investment Table, shown above, set forth the information and data used to evaluate the Bank's level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

During the evaluation period the Bank made 25 qualifying investments and donations totaling \$3.4 million. Investments included Federal National Mortgage Association (FNMA) mortgage backed securities and certificates of deposit in minority owned depository institutions. Investments in the mortgage backed securities provides funds to LMI families to purchase homes in the AA. Fifteen donations were made to six different organizations including organizations that support financial literacy and community services for LMI individuals. There were 3 prior period investments included in the 25 investments. Those were 2 mortgage backed securities pools and one certificate of deposit in a minority owned institution. Additionally, 3 certificates of deposits in a minority owned institution totaling \$240,000 were purchased during the analysis period. However, they were sold in 2018 for liquidity purposes.

Extent to Which the Bank Provides Community Development Services

Grow Entrepreneurship Program- This program is designed to provide members of the community with instruction on how to grow their small business. The ultimate goal of the program is to have participants create an action plan for their existing business that identifies ways in which their business can expand. The program also serves as an introduction to the services available from the Small Business Administration loan programs and which of these services can be applied for at CNB.

Center for Financial Training (Future Banker's Camp)- This program works with Miami-Dade College Center for Financial Training and numerous banks in the community. It is designed to mentor or provide financial literacy for high school students from LMI geographies. Students are sponsored by local area banks for free. The students are provided instruction at each bank according to the internal procedures at those banks. At CNB, interns are instructed by bank personnel in all areas of the Bank. During the evaluation period the Bank sponsored six interns.

Small Business Development Division - Small Business Bonding and Financial Assistance Program (SBBFAP)- A financing program administered under a cooperative agreement by Miami-Dade County. The SBBFAP offers eligible Small Business Enterprise (SBE) firms, including SBDE goods, services, construction and architecture and engineering firms a line of credit financing up to \$250,000. The borrower amounts will be used to fund invoices to requisitions for work completed under a Miami-Dade County contract or subcontract. The Bank also participates in workshops to provide information on the SBBFAP works.

Hurricane Irma Relief Assistance- CNB reached out to their customers to help those customers affected by Hurricane Irma. The Bank offered payment deferments to those in need and those who requested the help. Approximately 30-40 customers were provided relief.

Appendix A: Scope of Examination

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

Time Period Reviewed:	05/02/2016 to 12/31/2018	
Bank Products Reviewed:	Small Business Community Development Loans, Qualified Investments, Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Florida		
MSA 33100 Miami-Ft Lauderdale- West Palm Beach, FL (partial)	Full-scope	Miami-Dade County

Appendix B: Summary of MMSA and State Ratings

RATINGS Continental National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Continental National Bank	Outstanding	Outstanding	Outstanding
MMSA or State:			
Florida	Outstanding	Outstanding	Outstanding

(*) The Lending Test and Community Development Test carry equal weight 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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full Review																				
MSA 33100-FL (partial)	20	7,998	100.0	242,848	3.4	10.0	3.2	21.8	55.0	20.5	30.3	10.0	28.5	43.7	25.0	46.8	0.9	0.0	0.9	
Total	20	7,998	100.0	242,848	3.4	10.0	3.2	21.8	55.0	20.5	30.3	10.0	28.5	43.7	25.0	46.8	0.9	0.0	0.9	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-2018
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Full Review																				
MSA 33100-FL (partial)	20	6,545	100.0	226,331	4.3	10.0	4.6	21.9	55.0	21.4	28.2	10.0	27.35	44.4	25.0	45.5	1.2	0.0	1.2	
Total	20	6,545	100.0	226,331	4.3	10.0	4.6	21.9	55.0	21.4	28.2	10.0	27.3	44.4	25.0	45.5	1.2	0.0	1.2	

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Full Review												
MSA 33100-FL (partial)	20	7,998	100.0	242,848	90.7	65.0	48.5	3.8	30.0	5.5	5.0	
Total	20	7,998	100.0	242,848	90.7	65.0	48.5	3.8	30.0	5.5	5.0	
<i>Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-2018
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Full Review												
MSA 33100-FL (partial)	20	6,545	100.0	226,331	90.6	50.0	52.9	4.0	45.0	5.3	5.0	
Total	20	6,545	100.0	226,331	90.6	50.0	52.9	4.0	45.0	5.3	5.0	
<i>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</i>												