



PUBLIC DISCLOSURE

June 5, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Terrabank, National Association
Charter Number: 20157

3191 Coral Way
Miami, FL 33145

Office of the Comptroller of the Currency

Miami 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.

Table of Contents

Overall CRA Rating..... 1
Description of Institution..... 2
Scope of the Evaluation..... 3
Discriminatory or Other Illegal Credit Practices Review..... 3
State Rating..... 4
 State of Florida..... 4
Appendix A: Scope of Examination..... A-1
Appendix B: Summary of State Rating..... B-1
Appendix C: Definitions and Common Abbreviations..... C-1
Appendix D: Tables of Performance Data..... D-1

Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**.

The lending 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) census tracts and the excellent distribution among businesses of different sizes throughout the Bank's assessment area (AA), given the Bank's size and performance context factors;
- A substantial majority of the Bank's loan originations are within its AA;
- The Bank's level of lending, based on the average quarterly loan-to-deposit (LTD) ratio is reasonable for the evaluation period;
- The Bank did not receive any CRA-related complaints during the evaluation period; and
- An adequate responsiveness to community development needs.

Loan-to-Deposit Ratio

Considering the Bank's size, financial condition, and credit needs of the AA, the Bank's LTD ratio is reasonable considering performance context. The quarterly average LTD ratio for the Bank during the evaluation period was 58.19 percent. The quarterly average LTD ratio for three peer Banks was 77.03 percent, ranging from a high of 97.14 percent to a low of 58.61 percent. The peer banks used in the analysis were located in Miami-Dade County and had similar lending strategies, with a focus on business lending. These institutions all report total assets less than \$1 billion.

The Bank's average LTD ratio declined from 73.2 percent at the prior evaluation period as the Bank experienced a significant influx of local and foreign deposits due to the economic uncertainty caused by the coronavirus disease (COVID-19) pandemic. The influx of deposits associated with government stimulus checks and the Paycheck Protection Program (PPP) coupled with Bank's strategy to diversify its loan portfolio also contributed to the decrease in the average LTD ratio. However, the Bank was actively engaged in lending and was responsive in meeting community needs through small business lending. The Bank made 194 PPP loans totaling \$21 million during the evaluation period.

Lending in Assessment Area

A substantial majority of the Bank's loans are inside its AA. The Bank originated and purchased 84.6 percent of its total loans by number inside the Bank's AA. This conclusion is based on a random sample of 26 business loans that were originated during the evaluation period. This analysis is performed at the Bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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	22	84.6%	4	15.4%	26	4,607,222	95.2%	232,559	4.8%	4,839,781
Total	22	84.6%	4	15.4%	26	4,607,222	95.2%	232,559	4.8%	4,839,781

Source: Bank Data

Description of Institution

Terrabank, N.A. is a single-state institution community bank, which was founded in 1985 and headquartered in Miami, Florida. Terrabank has no holding company or affiliates and is part of a parallel banking organization (PBO) owned by the Promerica Group. The Bank's four branches are all located in Miami-Dade County and each location has an automated teller machine (ATM). The branches are located in the cities of Miami, South Miami, Hialeah, and one is located in unincorporated Miami-Dade County. The Hialeah branch is located in a moderate-income census tract (CT). The Bank has designated one AA, which is Miami-Dade County as its AA. This AA is represented by Metropolitan Division (MD) 33124 and is part of the MSA 33100 Miami-Fort Lauderdale-West Palm Beach which includes Miami-Dade, Broward, and Palm Beach counties.

As of December 31, 2021, Terrabank reported total assets of \$625.0 million and tier 1 capital of \$44.1 million. Net loans totaled represented \$322.4 million or 51.6 percent of total assets and total deposits totaled \$579.7 million at year end 2021. Commercial loans, including loans secured by commercial real estate, represented 53.86 percent of gross loans. 1-4 family residential loans and multifamily loans represented 31.0 and 14.7 percent respectively while consumer loans represented less than 1 percent of the Bank's gross loans.

The Bank's primary lending strategy is to originate loans to businesses, primarily for real estate purposes. The Bank also offers a variety of deposit and loan products to foreign and domestic businesses and individuals. Foreign deposits to total deposits at year-end 2021 represented 45.0 percent of total deposits and contributed to the Bank's lower average LTD ratio when compared to the prior evaluation period. Products offered include demand deposit accounts, money market accounts, commercial and residential real estate secured loans, commercial lines of credit, Small Business Administration (SBA) loans, and credit cards. Residential loans, which represents a growing segment of the loan portfolio are originated primarily to foreign nationals that seek to purchase secondary homes and investment properties. The Bank is an SBA Preferred Lender, the highest level of approval and status that a lender can hold in the SBA loan program, which allows the Bank to approve and fund SBA loans without direct loan approval by the SBA. The Bank's customers also have free access to the Presto-Publix network of ATMs that are available throughout Florida.

The AA meets the requirements of the CRA regulation and does not arbitrarily exclude LMI geographies. There are no legal, financial, or other factors that impede the Bank's ability to meet the credit needs in its AA. During the last CRA evaluation dated June 1, 2020, the Bank was rated "Satisfactory".

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated Terrabank's CRA performance within its AA using small bank performance criteria and examination procedures. Our evaluation period for the lending test is from January 1, 2020 through December 31, 2021. The bank elected to have community development investments and services considered in the CRA performance evaluation. The Bank's strategic focus is business lending. Consistent with the Bank's primary lending focus, loans to businesses were sampled. Examiners reviewed 22 small loans to businesses in the AA to determine the distribution of loans by borrower income and geography. We did not include home mortgage lending in our analysis as it is not a primary product for the Bank and is mostly investor-owned properties.

Selection of Areas for Full-Scope Review

In each state where the Bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, Bank delineated assessment areas located within the same metropolitan statistical area (MSA) are combined and evaluated as a single AA. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The Bank's overall rating is based on its lending performance in the state of Florida. Refer to the "Scope" section under each State Rating section for details regarding how the area was weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) 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 Consumer Financial Protection Bureau, 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 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) census tracts and the excellent distribution of lending among businesses of different sizes throughout the Bank's AA;
- A substantial majority of the Bank's loan originations are within its AA;
- The Bank's average quarterly LTD ratio is reasonable for the evaluation period;
- The Bank did not receive any CRA-related complaints during the evaluation period; and
- An adequate responsiveness to community development needs.

Description of Institution's Operations in Florida

Terrabank has traditionally been a commercial lender. Although management has made efforts to diversify their loan portfolio in the last few years by increasing their level of residential lending, business lending remains the Bank's core business and the Bank's primary lending product. The Bank has four branches in the AA and a total of four ATMs, or one at each branch. One branch is located in a moderate-income CT and the other three are located in middle-income CTs.

On March 20, 2020, the State of Florida declared a statewide stay-at-home order, which mandated the closure of all non-essential businesses in an effort to prevent the spread of COVID-19. The economic effects of these closures were detrimental to families and businesses in Miami-Dade County. On May 14, 2020, non-essential businesses throughout Florida were permitted to reopen with occupancy restrictions. On April 29, 2021, the State of Florida suspended all COVID-19 public health restrictions and businesses were allowed to open at full capacity.

During the evaluation period, Miami-Dade County experienced a high level of unemployment due to the COVID-19 pandemic, driven by its heavy reliance on the tourism and hospitality industry. Miami-Dade County's unemployment rate peaked at 12.0 percent in May 2020, compared to the state of Florida's peak unemployment rate of 14.1 percent in May 2020. Despite the high unemployment rate, the SBA's PPP had a positive impact by providing funding to help small businesses retain employees.

As of December 31, 2021, the unemployment rate in Miami-Dade County was 3.0 percent, which was lower than Florida's rate of 3.6 percent and the national average of 3.9 percent, and an indication that the assessment area's economy was recovering from the effects of COVID-19. However, employment

had not returned to pre-pandemic levels when compared to the unemployment rate of 2.4 percent at the end of 2019.

According to Dunn and Bradstreet, as of June 2020, there were 533,780 non-farm businesses in Miami-Dade County, of which approximately 98.96 percent are considered small businesses. The top industries were services (32.9 percent), finance, insurance and real estate (10.5 percent) and retail trade (8.4 percent). According to Moody's Analytics, the tourism industry was gradually recovering from the impact of COVID-19. Miami-Dade County had been adding jobs in a broad range of industries, with particularly strong growth in leisure/hospitality and logistics. Hotel occupancy rates were nearly back to their pre-pandemic level, and robust demand for lodging as tourism picked up, allowing hotels to raise their room rates substantially. Cruise traffic also ramped up as operations normalized. However, worker shortages adversely impacted job recovery despite the high number of tourists.

A lack of affordable housing inventory and slow economic recovery created by the COVID-19 pandemic represents key challenges for LMI families to purchase homes. According to the Federal Reserve Bank of St. Louis, housing inventory in Miami-Dade County decreased by 55.7 percent from January 2020 to December 2021. High home prices are attributed to a low supply of homes for sale and a steady arrival of new residents moving to Miami-Dade County. The average home value in Miami-Dade County is overpriced by 19.2 percent according to a 2021 report from Florida Atlantic University. Despite the ripple effects of the pandemic across the country, Miami remained the number one US destination for foreign home buyers, an attractive location for investors to purchase residential real estate. Based on data from Miami Realtors, Miami-Dade County accounted for the largest share of South Florida's foreign buyers representing 70 percent in 2020 and 65 percent in 2021. This demand coupled with the high level of competition from cash buyers further drives up prices and limits the ability of LMI families to reach their goal of homeownership.

The 2015 American Community Survey (ACS) Census estimates the median value of owner-occupied housing units for Miami-Dade County to be \$244,010, while the poverty level was 16.9 percent. According to the 2015 ACS Census, 18.4 percent of households spent more than 30 percent of their income on mortgage payments. Rents are also high given the median monthly gross rent of \$1,155. Approximately 24.1 percent of households spend more than 30 percent of their income on rental payments. LMI renters, particularly low-income, utilize rental subsidies to assist with rent payments. The economic impact of COVID-19 created an adverse housing situation for both LMI renters and homeowners as many lost jobs or had hours cut and faced challenges meeting their monthly rents and mortgage obligations. The Coronavirus Aid, Relief, and Economic Security (CARES) Act and various government programs prohibited evictions for LMI renters and homeowners requiring assistance.

The Bank operates in a highly competitive market given the wide variety of options available for financial services within Miami-Dade County. Competitors include other local community banks and larger financial institutions, credit unions and nonbank financial institutions such as mortgage lenders. Based on the June 30, 2021 Federal Deposit Insurance Corporation's (FDIC) Summary of Deposits-Market Share Report, Terrabank's share of the market is low. The Bank's deposits totaled \$557.9 million, representing less than 1 percent of the deposit market share and ranking 35 out of 55 institutions. The top competitors in the AA include large banks such as Bank of America, N.A, Wells Fargo Bank, JPMorgan Chase Bank, N.A, Citibank N.A., and City National Bank of Florida. Combined, their deposits represent 55.45 percent of the total deposit market share in Miami-Dade County.

To assess community needs, we considered recent housing and demographic data as well as recent interviews with two community organizations based in Miami Dade County. Community contacts

indicated that affordable housing, financial literacy, and loans to small businesses were the greatest needs in the AA. Rising demand and home prices cause affordable housing to be a primary concern. One organization promotes affordable housing by providing homeownership services in English and other foreign languages, the other provides services to small businesses and supports economic development.

MSA 33124 – Miami-Miami Beach-Kendall, FL

Table A – Demographic Information of the Assessment Area						
Assessment Area: MSA - 33124 Miami-Miami Beach-Kendall, FL 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	519	5.8	27.7	28.9	34.1	3.5
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	533,780	3.1	20.8	25.9	47.8	2.4
Farms by Geography	5,633	3.5	22.8	27.1	45.8	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 MSA - 33124 Miami-Miami Beach-Kendall, FL		\$49,264	Median Housing Value			\$244,010
			Median Gross Rent			\$1,155
			Families Below Poverty Level			16.9%
<i>Source: 2015 ACS and 2020 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>						

Scope of Evaluation in Florida

The rating for the state of Florida is based on a full-scope review of the performance in the Miami-Dade AA. Refer to Appendix A for additional information on the AA under review.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank's performance in the Miami-Dade AA is good.

Distribution of Loans by Income Level of the Geography

The Bank exhibits 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 of small loans to businesses.

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

The distribution of loans to small businesses in low-income geographies exceeded both the percent of businesses and the aggregate lending data. The distribution of loans to small businesses in moderate-income geographies exceeded the percent of businesses and the aggregate lending data.

Lending Gap Analysis

There were no unexplained conspicuous gaps in lending to small businesses in LMI geographies during the evaluation period.

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 of small loans to businesses.

The distribution of loans to small businesses is excellent in the AA.

The Bank's loans to businesses with revenues of less than or equal to \$1 million was somewhat lower than the percentage of businesses but exceeded the aggregate lending data.

Responses to Complaints

The Bank had no CRA related complaints during the evaluation period.

COMMUNITY DEVELOPMENT

Based on a full scope review the Bank exhibits adequate responsiveness to community development needs in the state through 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. Performance related to community development activities had a positive effect on the Bank's rating in the state.

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)	0	0	4	503	4	100	503	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.

During the evaluation period, the Bank made a total of four investments and grants in the AA totaling \$502,700 that qualified for CRA consideration. Combined, they represented 1.1 percent of tier one capital. Two investments totaled \$500,000 and were part of a Fannie Mae pool that financed apartments that were a Low-Income Housing Tax Credit (LIHTC) property for seniors located in a low-income, and high-poverty census tract in Miami-Dade County and a Freddie Mac Pool that financed loans to LMI borrowers. Two grants totaled \$2,700 and were made to qualifying organizations in the AA that provided affordable housing for LMI individuals and an organization that provided community services to LMI people.

Extent to Which the Bank Provides Community Development Services

The Bank participated in nine community service activities during the evaluation period that provided a total of 12 hours of service to organizations serving LMI people in Miami Dade County.

Appendix A: Scope of Examination

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

Time Period Reviewed:	1/1/20 to 12/31/21	
Bank Products Reviewed:	Small business loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	NA	NA
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 State Ratings

RATINGS	TERRABANK, NATIONAL ASSOCIATION
Overall Bank:	Lending Test Rating
Terrabank, National Association	Outstanding
MMSA or State:	
Florida	Outstanding

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.

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.

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.

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.

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.

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.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the 2020-21 Geography

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 33100-FL (partial)	22	4,607	100	185,168	3.1	12.3	3.1	20.8	51.7	22.3	25.9	14.9	27.0	47.8	21.2	45.4	2.4	0.0	2.2
Total	22	4,607	100	185,168	3.1	12.3	3.1	20.8	51.7	22.3	25.9	14.9	27.0	47.8	21.2	45.4	2.4	0.0	2.2

*Source: 2020 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 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

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	2020-21 Businesses	% Bank Loans
MSA 33100-FL (partial)	22	4,607	100	185,168	93.3	63.2	42.2	2.7	36.8	4.0	0.0
Total	22	4,607	100	185,168	93.3	63.2	42.2	2.7	36.8	4.0	0.0

*Source: 2020 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.