

PUBLIC DISCLOSURE

May 14, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Pilot Bank
12471 West Linebaugh Avenue
Tampa, Florida 33626**

RSSD ID NUMBER: 318835

**FEDERAL RESERVE BANK OF ATLANTA
1000 Peachtree Street, N.E.
Atlanta, Georgia 30309-4470**

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the 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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INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

Major factors supporting the institution's rating include:

- The bank's loan-to-deposit ratio is reasonable given the bank's asset size, financial condition, and assessment area credit needs.
- The bank originated a majority of its small business loans outside of its assessment area, which is reasonable considering the bank's specialization in the niche market of aviation-secured loans.
- The geographic distribution of loans reflects reasonable distribution throughout the assessment areas.
- The distribution of lending reflects more than reasonable penetration among businesses of different revenue sizes.
- The bank has not received any CRA-related complaints since the previous evaluation.

INSTITUTION

SCOPE OF EXAMINATION

The CRA performance evaluation assesses the bank's record of meeting the credit needs of its community, including low- and moderate-income neighborhoods, within the context of information such as asset size and financial condition of the institution, competitive factors, and the economic and demographic characteristics of its defined assessment area. This CRA performance review was based on the bank's lending performance in its assessment area using the Interagency Small Institution Examination Procedures. The rating was assessed using the following core criteria developed for evaluating CRA lending performance for small banks:

- Net Loan-to-Deposit (LTD) Ratio
- Lending Inside the Assessment Area
- Lending to Businesses of Different Sizes
- Geographic Distribution of Loans
- The bank's responsiveness to complaints it has received regarding its CRA activities, if applicable

A full-scope review was conducted for the Tampa assessment area, while the Lakeland assessment area was reviewed using limited-scope procedures. When determining the overall rating, greater weight was placed on the bank's performance in the Tampa assessment area because the majority of the bank's branches and lending is in this assessment area.

The bank is primarily a commercial lender; therefore, the evaluation included an analysis of small business loans originated from January 1, 2014, through December 31, 2017. During the review period, the bank ceased residential lending, and as of 2017, the bank was no longer a HMDA reporter. Therefore, HMDA-reportable loans will not be evaluated.

As part of this evaluation, examiners obtained information from one community contact that is familiar with the economic and demographic characteristics as well as community development opportunities in the assessment areas. Information obtained from this contact was used to establish a context for the communities in which the bank operates and to gather information on the bank's performance. Specific information obtained from the

community contact is included in the applicable section of the evaluation for the full-scope assessment area. The contact identified areas for participation of local financial institutions regarding small business development.

DESCRIPTION OF INSTITUTION

Pilot Bank is a full service bank providing retail, commercial, and investment services to individuals, businesses, and institutions in the greater Tampa Bay and Lakeland, Florida areas. Pilot Bank’s primary focus is in personal and business aircraft lending, which provides the bank with a unique niche and lending opportunity nationwide. Its parent company, Pilot Bancshares, Inc. (PBI), is a domestic financial holding company that was created in October 1995 and owns 100 percent of Pilot Bank. Both entities are located in Tampa, Florida. In addition to the bank, PBI has two non-bank subsidiaries: National Aircraft Finance Company (NAFCO) and Pilot Bancshares Statutory Trust II.

Branch Offices

Pilot Bank operates five branch offices within its assessment areas. Four of these branches are in the Tampa MSA, and one branch is located in the Lakeland MSA. Both assessment areas are comprised of a diverse population as well as low- and moderate-income census tracts. As of December 31, 2017, three of the bank’s branch locations in Tampa are located in upper-income tracts and one is located in an unknown income tract. The Lakeland branch is located in a moderate-income census tract. No branches were opened or closed since the previous examination.

Loan Portfolio

According to the December 31, 2017 Report of Condition, the bank’s assets totaled \$305.1 million, which represents an increase of \$106.3 million since the bank’s previous CRA evaluation conducted in April 2014.

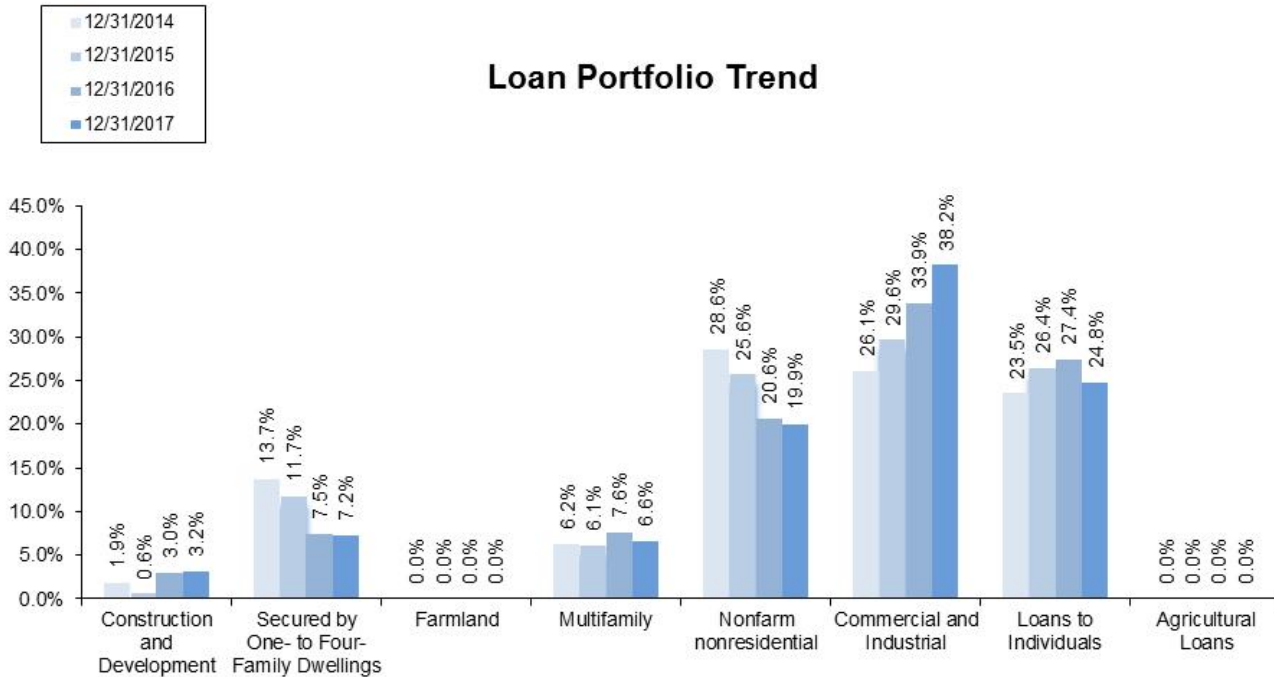
The following table and graphs show the composition of the loan portfolio according to the Consolidated Report of Condition and Income (Call Report).

COMPOSITION OF LOAN PORTFOLIO								
Loan Type	12/31/2017		12/31/2016		12/31/2015		12/31/2014	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	7,274	3.2%	5,602	3.0%	919	0.6%	2,740	1.9%
Secured by One- to Four- Family Dwellings	16,442	7.2%	13,763	7.5%	18,677	11.7%	20,250	13.7%
Other Real Estate: Farmland	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multifamily	15,150	6.6%	13,928	7.6%	9,655	6.1%	9,146	6.2%
Nonfarm nonresidential	45,435	19.9%	37,872	20.6%	40,811	25.6%	42,233	28.6%
Commercial and Industrial	87,059	38.2%	62,355	33.9%	47,124	29.6%	38,481	26.1%
Loans to Individuals	56,521	24.8%	50,426	27.4%	42,006	26.4%	34,752	23.5%
Agricultural Loans	0	0.0%	0	0.0%	40	0.0%	55	0.0%
Total	\$227,881	100.00%	\$183,946	100.00%	\$159,232	100.00%	\$147,657	100.00%

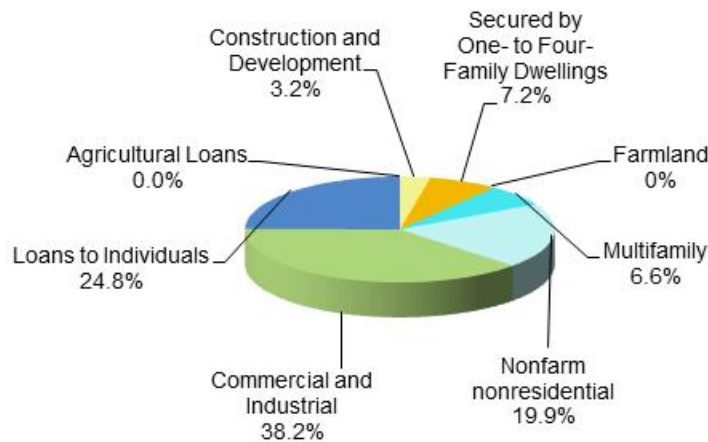
* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.

As illustrated by the table, the bank’s loan portfolio as of December 31, 2017, consisted primarily of commercial and industrial loans (38.2 percent), followed by loans to individuals (24.8 percent) and nonfarm, nonresidential loans (19.9 percent). Included in the categories of commercial and industrial and loans to individuals are loans to borrowers located throughout the United States to purchase small aircrafts. Significant growth by dollar amount in the loan portfolio occurred in commercial and industrial loans, which increased by 126.2 percent from December 31, 2014, to December 31, 2017. Additionally, sizeable growth by dollar amount occurred in loans to individuals, which increased by 62.6 percent. The majority of other loan types increased as

well; however, there was a decrease by dollar amount in loans secured by one- to four- family dwellings by 18.8 percent. The charts below further illustrate that commercial and industrial loans and loans to individuals are the primary types of loans originated by the bank.



**Loan Portfolio
as of
12/31/17**



Credit Products

The bank is primarily a commercial lender, with a specialty in providing aviation/personal aircraft loans through its affiliate, NAFCO. The bank also offers traditional credit products including consumer loans, home equity lines of credit, small business loans, and business real estate loans. The bank has not introduced any new loan products since the previous evaluation, and discontinued residential real estate lending in 2017.

Pilot Bank has two assessment areas for CRA purposes. The assessment areas include portions of the Tampa-St. Petersburg-Clearwater MSA and the Lakeland-Winter Haven MSA. For 2014 through 2016, the bank’s Tampa assessment area consisted of all of Hillsborough County and certain census tracts in Pasco and Pinellas counties; the Lakeland assessment area consisted of all of Polk County. For 2017, the Tampa assessment area was adjusted to consist of a portion of Hillsborough County, along with portions of Pasco and Pinellas counties. The Lakeland assessment area was also adjusted to consist of a portion of Polk County.

Pilot Bank complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its assessment areas. The bank received a “Satisfactory” rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta dated April 21, 2014 under the Small Institution Examination Procedures.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Overview

The bank’s lending test performance is rated satisfactory. Performance context factors such as economic conditions, competition, and demographics were considered when evaluating the bank’s lending performance. The bank’s loan-to-deposit ratio is reasonable. Based on an analysis of small business loans originated from January 1, 2014, through December 31, 2017, the geographic distribution of loans reflects reasonable penetration throughout the assessment areas. The distribution of borrowers reflects more than reasonable penetration among individuals of different income levels and businesses of different revenue sizes.

Loan-to-Deposit Ratio

The bank’s net loan-to-deposit (LTD) ratio is reasonable given the bank’s asset size, financial condition, and assessment area credit needs. The bank’s average LTD ratio for the sixteen quarters ending December 31, 2017, was 83.9 percent. The bank’s average LTD ratio compares favorably with those of similarly sized banks operating in the bank’s local area, which range from 58.8 percent to 119.0 percent, and with the LTD ratios of all banks operating in the local area that are considered “small banks” for CRA purposes, which range from 58.8 percent to 90.0 percent.

Assessment Area Concentration

The bank originated less than a majority of the total loans analyzed to businesses located within the bank’s assessment areas. A number of performance context factors were considered to properly evaluate the bank’s lending inside and outside its assessment areas. The table below shows the number and percentage of loans reviewed that were located inside and outside the bank’s assessment areas.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Total Small Business	82	16.7	\$21,846	23.7	410	83.3	\$70,454	76.3
TOTAL LOANS	82	16.7	\$21,846	23.7	410	83.3	\$70,454	76.3

Note: Affiliate loans not included

The bank originated only 16.7 percent of small business loans within the bank's assessment areas. While the percentage of the bank's small business loans originated inside the assessment area is low, the bank's lending is reasonable, given that a majority of the bank's commercial loans are aircraft loans originated to businesses located throughout the United States. Aviation lending continues to be the bank's primary lending focus.

Distribution of Lending by Geography and Business Size

The geographic distribution of small business loans reflects reasonable penetration throughout the assessment areas given the opportunity, the bank's financial condition, and competition in these markets. The distribution of lending reflects more than reasonable penetration among businesses of different revenue sizes. The analyses of small business lending within the full-scope assessment area are discussed in detail later in this report.

RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS

The bank has not received any CRA-related complaints since the previous evaluation.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of prohibited discrimination or the use of other illegal credit practices was noted during the review. The bank is in compliance with the substantive provisions of antidiscrimination laws and regulations (Regulation B—Equal Credit Opportunity and the Fair Housing Act).

**METROPOLITAN AREA
FULL-SCOPE REVIEW**

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TAMPA ASSESSMENT AREA

Overview

For 2014 to 2016, the bank designated the entire Hillsborough County and portions of Pasco and Pinellas counties as its Tampa assessment area. For 2017, the bank changed its Tampa assessment area to include only a portion of Hillsborough County, along with portions of Pasco and Pinellas counties. Pilot Bank operates four branches with ATMs in the Tampa assessment area. As of December 31, 2017, three of the branches are located in upper-income census tracts, and one branch is located in an unknown census tract.

Population Information

According to U.S. census data as of July 1, 2017, the population of the Tampa-St. Petersburg-Clearwater MSA was 3.1 million, an increase of 7.7 percent since July 1, 2013. Tampa represents the largest city in the MSA, while the Tampa-St. Petersburg-Clearwater MSA is the second largest MSA in Florida, behind the Miami-Fort Lauderdale-West Palm Beach MSA.

Income Characteristics

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the area. The following tables set forth the estimated median family income in 2014, 2015, 2016, and 2017 for the Tampa–St. Petersburg–Clearwater, Florida MSA. It also provides a breakdown of the estimated annual income based on income level.

**Borrower Income Levels
Tampa-St. Petersburg-Clearwater, FL MSA**

FFIEC Estimated Median Family Income		Low	Moderate	Middle	Upper
		0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2014	\$57,400	0 - \$28,699	\$28,700 - \$45,919	\$45,920 - \$68,879	\$68,880 - & above
2015	\$59,000	0 - \$29,499	\$29,500 - \$47,199	\$47,200 - \$70,799	\$70,800 - & above
2016	\$59,200	0 - \$29,599	\$29,600 - \$47,359	\$47,360 - \$71,039	\$71,040 - & above
2017	\$59,800	0 - \$29,899	\$29,900 - \$47,839	\$47,840 - \$71,759	\$71,760 - & above

The FFIEC estimated median family income for the Tampa MSA increased by \$2,400 from 2014 to 2017. According to 2017 FFIEC census data, there were 267,451 families in the assessment area. Of those families, 23.0 percent were low-income; 16.6 percent were moderate-income; 17.6 percent were middle-income; and 42.8 percent were upper-income. Of the total families, 13.3 percent had incomes below the poverty level.

Demographic Data by Census Tracts

The 2017 FFIEC census data and 2016 Dunn and Bradstreet (D&B) was used to define the bank's assessment area and conduct the lending analysis of 2017 data while 2016 FFIEC census data and 2016 Dunn and Bradstreet (D&B) was used to define the bank's assessment area and to conduct the lending analysis for 2014-2016.

According to 2017 FFIEC census data, the Tampa assessment area consists of 274 census tracts, 30 of which are low-income tracts (10.9 percent); 62 are moderate-income tracts (22.6 percent); 81 are middle-income tracts (29.6 percent); 94 are upper-income tracts (34.3 percent); and 7 have unknown income levels (2.6 percent). Based on the bank's Tampa assessment area for 2017, the 2016 D&B data shows that 6.6 percent of businesses in the Tampa assessment area are located in low-income tracts; 18.8 percent are in moderate-income tracts; 28.8 percent are in middle-income tracts; 45.2 percent are in upper-income tracts; and 0.6 percent are in tracts with unknown income levels.

Housing Characteristics

According to the 2017 FFIEC census data, there were 482,697 housing units in the Tampa assessment area. Of that number, 49.4 percent were owner-occupied units, 39.4 percent were rental units, and 11.2 percent were vacant units. According to data from the Florida Association of Realtors, the median single family home sales price in the Tampa MSA for 2017 was \$220,000.¹ This is an increase of 39.7 percent over the 2014 median price. The median age of housing in the assessment area is 35 years compared to 30 for the state of Florida. The affordability ratio is 31.3 in the assessment area and is higher than the affordability ratio for the state of Florida at 29.9. The affordability ratio is defined as the median household income divided by the median housing value. A higher ratio means that the housing is considered more affordable while a lower ratio means the housing is considered less affordable.

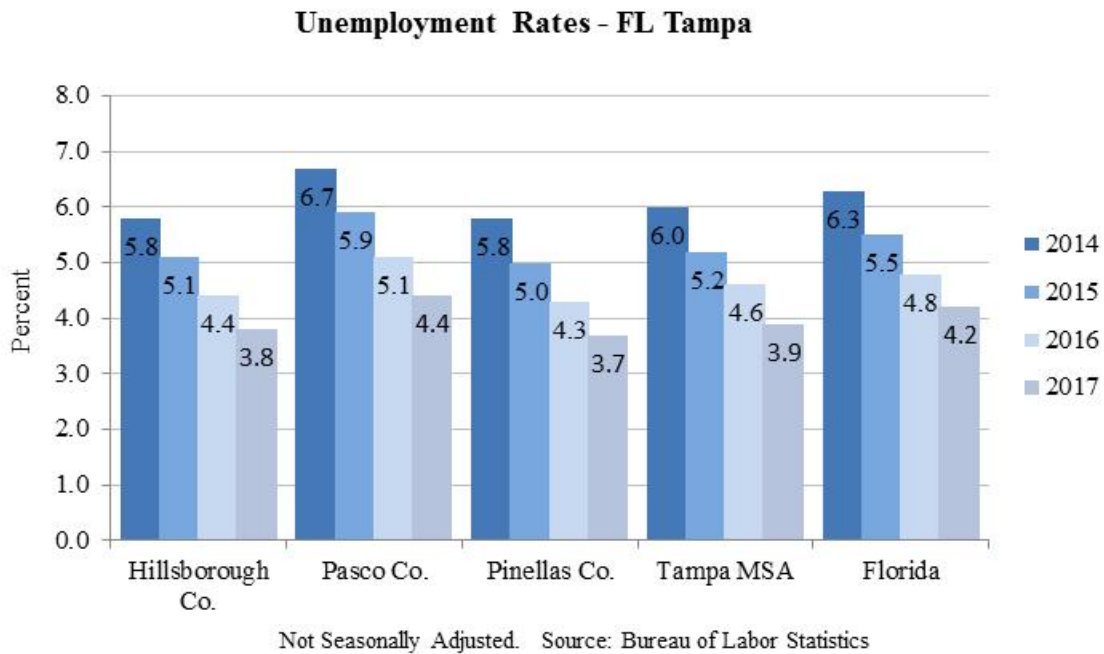
Employment Statistics

According to the Tampa Hillsborough Economic Development Corporation, the number of employed persons in the Tampa MSA totaled 1,455,306 as of December 2017. The largest employers in the Tampa area are Publix Super Markets, Inc., BayCare Health Care Systems, HCA Holdings, MacDill Air Force Base, Verizon Communications, Inc., and Tampa International Airport.

The following table shows the unemployment rates for the counties included in the bank's assessment area and for the state of Florida. According to the Bureau of Labor Statistics, the 2017 annualized unemployment rate (not seasonally adjusted) for the Tampa MSA was 3.9 percent which was slightly lower than the rate for the state of Florida at 4.2 percent.

¹ Florida Market Reports. Florida Association of Realtors. Web. 24 May 2018. <http://www.floridarealtors.org/ResearchAndStatistics/Florida-Market-Reports/Index.cfm>

The following table shows the unemployment rate percentages for the bank’s assessment area and the State of Florida.



Competition

According to the June 30, 2017 FDIC Summary of Deposits Report for Hillsborough, Pasco, and Pinellas counties, Pilot Bank ranked 33rd in deposit market share with \$204.6 million or 0.26 percent of total deposits. During the same time period, there were 59 other institutions operating 683 branches in the three-county area. The assessment area is a highly competitive banking market because of the significant presence of banks operating in the area. The bank’s competition comes mainly from statewide, regional, and national banks; however, competition does not appear to have adversely affected the bank’s ability to serve the credit needs of its assessment area.

Community Contact and Credit Needs

To better understand the community development and economic landscape, an expert in small business development was contacted. This individual discussed the various opportunities and challenges across the region in terms of small businesses, as well as how financial institutions can be responsive to this sector. Bank management also provided input on the performance context issues impacting the assessment area. This information is reflected in the appropriate sections below.

Small businesses play an important role in the Tampa economy. Based on the bank’s Tampa assessment area for 2017 and the 2016 D&B information, there were 72,825 businesses within the assessment area, of which 92.0 percent had total annual revenues less than or equal to \$1 million. Additionally, 18.6 percent of small businesses with revenues less than or equal to \$1 million are located in moderate-income tracts and 6.2 percent are in low-income tracts. Throughout the assessment area, lending to small businesses increased during the review period. According to an analysis of CRA loan data, the number of small business loans increased by 20.9 percent between 2014 and 2016, with nearly 64,000 loans made in 2016. Loans made to firms with revenues of \$1.0 million represented 53.1 percent share of total small business loans in 2016. Although the percentage share has remained relatively stable, the number of small business loans made to firms with revenues of \$1.0 million or less have steadily increased since 2014. This may be an indication that there are

fewer obstacles for smaller firms trying to access credit in the market. It should also be noted that on average in 2016, 95.1 percent of small business loans originated in Hillsborough, Pasco and Pinellas counties, Florida, were less than \$100,000, which indicates that banks are providing the types of loans more small businesses require.

There is still a critical need, however, for technical assistance and alternative financing for small business owners who are unable to qualify for bank financing. Interviews revealed that banks are aggressively competing for small business loans for financially stable businesses; for those businesses that are still struggling, credit access is limited. There is a need for additional credit sources to assist these business owners considered to be unbankable. Banks can engage with small business focused Community Development Financial Institutions (CDFIs) and loan funds to help meet this important community credit need.

In terms of small business resources in the area, the University of South Florida (USF) operates a small business development center (SBDC) in the assessment area. As an SBA-funded entity, the SBDC specializes in providing technical assistance and training to small businesses. As such, the SBDC affords an opportunity for financial institutions to work directly with small businesses in the local area by providing technical assistance and access to credit.

Assessment Area Demographics

The bank's Tampa assessment area changed in 2017; consequently, the following tables provide demographic characteristics of the bank's assessment area for the period 2014 – 2016 and for 2017, respectively. The data reflects the 2016 and 2017 FFIEC census data and 2016 D&B data used to analyze the bank's CRA performance. Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis.

Combined Demographics Report

Assessment Area: FL Tampa

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	25	7.2	16,171	5.0	6,397	39.6	64,344	19.9
Moderate-income	74	21.4	68,018	21.1	11,634	17.1	54,935	17.0
Middle-income	120	34.7	107,951	33.5	9,429	8.7	59,552	18.5
Upper-income	118	34.1	130,552	40.5	5,216	4.0	143,871	44.6
Unknown-income	9	2.6	10	0.0	0	0.0	0	0.0
Total Assessment Area	346	100.0	322,702	100.0	32,676	10.1	322,702	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	31,313	9,456	2.9	30.2	16,966	54.2	4,891	15.6
Moderate-income	132,863	56,900	17.6	42.8	56,487	42.5	19,476	14.7
Middle-income	197,625	112,675	34.9	57.0	62,308	31.5	22,642	11.5
Upper-income	207,209	144,219	44.6	69.6	41,592	20.1	21,398	10.3
Unknown-income	53	0	0.0	0.0	53	100.0	0	0.0
Total Assessment Area	569,063	323,250	100.0	56.8	177,406	31.2	68,407	12.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3,522	4.1	3,075	3.8	423	7.6	24	3.5
Moderate-income	16,084	18.5	14,434	17.9	1,551	27.7	99	14.5
Middle-income	27,947	32.2	25,801	32.0	1,988	35.6	158	23.2
Upper-income	39,156	45.1	37,166	46.1	1,590	28.4	400	58.7
Unknown-income	189	0.2	151	0.2	38	0.7	0	0.0
Total Assessment Area	86,898	100.0	80,627	100.0	5,590	100.0	681	100.0
Percentage of Total Businesses:			92.8		6.4		.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	20	2.7	19	2.8	1	1.9	0	0.0
Moderate-income	114	15.5	103	15.1	11	20.4	0	0.0
Middle-income	309	42.0	285	41.9	23	42.6	1	100.0
Upper-income	292	39.7	273	40.1	19	35.2	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	735	100.0	680	100.0	54	100.0	1	100.0
Percentage of Total Farms:			92.5		7.3		.1	

2016 FFIEC Census Data and 2016 D&B Information

Combined Demographics Report

Assessment Area: FL Tampa

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	30	10.9	18,906	7.1	7,569	40.0	61,545	23.0
Moderate-income	62	22.6	57,774	21.6	12,610	21.8	44,452	16.6
Middle-income	81	29.6	84,685	31.7	9,836	11.6	46,941	17.6
Upper-income	94	34.3	105,281	39.4	5,299	5.0	114,513	42.8
Unknown-income	7	2.6	805	0.3	202	25.1	0	0.0
Total Assessment Area	274	100.0	267,451	100.0	35,516	13.3	267,451	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	43,019	9,008	3.8	20.9	26,922	62.6	7,089	16.5
Moderate-income	108,890	43,805	18.4	40.2	51,566	47.4	13,519	12.4
Middle-income	154,513	75,873	31.8	49.1	61,510	39.8	17,130	11.1
Upper-income	174,044	109,153	45.8	62.7	48,702	28.0	16,189	9.3
Unknown-income	2,231	419	0.2	18.8	1,525	68.4	287	12.9
Total Assessment Area	482,697	238,258	100.0	49.4	190,225	39.4	54,214	11.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4,816	6.6	4,144	6.2	641	12.3	31	5.2
Moderate-income	13,699	18.8	12,471	18.6	1,157	22.1	71	11.9
Middle-income	20,958	28.8	19,098	28.5	1,725	33.0	135	22.5
Upper-income	32,895	45.2	30,898	46.1	1,638	31.4	359	59.9
Unknown-income	457	0.6	391	0.6	63	1.2	3	0.5
Total Assessment Area	72,825	100.0	67,002	100.0	5,224	100.0	599	100.0
Percentage of Total Businesses:			92.0		7.2		.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	8	2.0	7	1.8	1	4.0	0	0.0
Moderate-income	76	18.7	67	17.5	9	36.0	0	0.0
Middle-income	148	36.4	139	36.4	9	36.0	0	0.0
Upper-income	175	43.0	169	44.2	6	24.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	407	100.0	382	100.0	25	100.0	0	.0
Percentage of Total Farms:			93.9		6.1		.0	

2017 FFIEC Census Data and 2016 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Overview

The review analyzed 71 small business loans made in the Tampa assessment area. The bank’s lending performance is reasonable. The geographic distribution of loans reflects reasonable penetration throughout the assessment area. Also, the distribution of borrowers reflects more than reasonable penetration among businesses of different revenue sizes.

Geographic Distribution of Loans

For this analysis, the bank’s geographic distribution of small business lending was compared to demographic information. Considering the demographic data and area competition, Pilot Bank’s overall geographic distribution of small business loans reflects reasonable dispersion throughout the bank’s assessment area.

The following table shows the geographic distribution of small business loans originated from January 1, 2014 through December 31, 2017, in the Tampa assessment area and also includes a comparison of the bank’s small business lending to the demographic data.

Geographic Distribution of Small Business Loans

Assessment Area: FL Tampa

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2014, 2015, 2016				
	Bank				Small Businesses
	Count		Dollar		
#	%	\$ (000s)	\$ %	%	
Low	4	7.0%	\$1,121	6.7%	3.8%
Moderate	15	26.3%	\$5,701	34.3%	17.9%
Middle	10	17.5%	\$1,759	10.6%	32.0%
Upper	28	49.1%	\$8,046	48.4%	46.1%
Unknown	0	0.0%	\$0	0.0%	0.2%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>57</i>	<i>100.0%</i>	<i>\$16,626</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

The following table shows the geographic distribution of small business loans originated by Pilot Bank from January 1, 2017 through December 31, 2017, within the assessment area.

Geographic Distribution of Small Business Loans

Assessment Area: FL Tampa

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				
	Bank		Small Businesses		
	Count		Dollar		%
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	6.2%
Moderate	3	21.4%	\$747	18.1%	18.6%
Middle	4	28.6%	\$967	23.4%	28.5%
Upper	7	50.0%	\$2,426	58.6%	46.1%
Unknown	0	0.0%	\$0	0.0%	0.6%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>\$4,139</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2017 FFIEC Census Data and 2016 D&B Information

For 2014, 2015 and 2016, Pilot Bank’s small business lending in low-income tracts was 7.0 percent, which was more than the percentage of small businesses in these tracts at 3.8 percent. There was no small business lending in low-income tracts for 2017, which was significantly lower than 6.2 percent of the small businesses in these tracts. In 2014, 2015 and 2016, the bank originated 26.3 percent of its small business loans in the moderate-income tracts, which was higher than the percentage of small businesses in these tracts at 17.9 percent. In 2017, the bank originated 21.4 percent of its small business loans in the moderate-income tracts, which was higher than the percentage of small businesses in these tracts at 18.6 percent.

Lending to Businesses of Different Sizes

The bank’s lending to businesses of different revenue sizes is more than reasonable. The bank’s distribution of small business lending was compared to available demographic information. Performance context issues were also considered.

The following table shows, by loan size, the number and dollar volume of small business loans originated by Pilot Bank from January 1, 2014 through December 31, 2016, within the assessment area.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: FL Tampa

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2014, 2015, 2016				
		Bank				Total Businesses
Count		\$ (000s)		%		
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	57	100.0%	\$16,626	100.0%	92.8%
	Over \$1 Million	0	0.0%	\$0	0.0%	6.4%
	<i>Total Rev. available</i>	57	100.0%	\$16,626	100.0%	99.2%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.8%
	<i>Total</i>	57	100.0%	\$16,626	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	18	31.6%	\$900	5.4%	
	\$100,001 - \$250,000	15	26.3%	\$2,909	17.5%	
	\$250,001 - \$1 Million	24	42.1%	\$12,817	77.1%	
	<i>Total</i>	57	100.0%	\$16,626	100.0%	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	18	31.6%	\$900	5.4%	
	\$100,001 - \$250,000	15	26.3%	\$2,909	17.5%	
	\$250,001 - \$1 Million	24	42.1%	\$12,817	77.1%	
	<i>Total</i>	57	100.0%	\$16,626	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

According to 2016 FFIEC census data and 2016 D&B data, 92.8 percent of businesses in the assessment area have revenues of \$1 million or less. As the table indicates, the bank originated 100 percent of small business loans to entities with gross annual revenues of \$1 million or less, which was higher than the percentage of small businesses in the assessment area. Additionally, of the loans made to businesses with revenues of \$1 million or less, 31.6 percent were in amounts of \$100,000 or less and 57.9 percent were in amounts of \$250,000 or less, indicating the bank’s willingness to make small dollar loans to businesses.

The following table shows, by loan size, the number and dollar volume of small business loans originated by Pilot Bank from January 1, 2017 through December 31, 2017, within the assessment area.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: FL Tampa

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2017				
		Bank		\$ (000s)		Total Businesses
		Count				
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	14	100.0%	\$4,139	100.0%	92.0%
	Over \$1 Million	0	0.0%	\$0	0.0%	7.2%
	<i>Total Rev. available</i>	14	100.0%	\$4,139	100.0%	99.2%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.8%
	<i>Total</i>	14	100.0%	\$4,139	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	4	28.6%	\$335	8.1%	
	\$100,001 - \$250,000	3	21.4%	\$467	11.3%	
	\$250,001 - \$1 Million	7	50.0%	\$3,338	80.6%	
	<i>Total</i>	14	100.0%	\$4,139	100.0%	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	4	28.6%	\$335	8.1%	
	\$100,001 - \$250,000	3	21.4%	\$467	11.3%	
	\$250,001 - \$1 Million	7	50.0%	\$3,338	80.6%	
	<i>Total</i>	14	100.0%	\$4,139	100.0%	

Originations & Purchases
2017 FFIEC Census Data and 2016 D&B Information

According to 2017 FFIEC census data and 2016 D&B data, 92 percent of businesses in the assessment area have revenues of \$1 million or less. As the table indicates, the bank originated 100 percent of small business loans to entities with gross annual revenues of \$1 million or less, which was higher than the percentage of small businesses in the assessment area. Additionally, of the loans made to businesses with revenues of \$1 million or less, 28.6 percent were in amounts of \$100,000 or less and 50 percent were in amounts of \$250,000 or less, indicating the bank's willingness to make small dollar loans to businesses.

**METROPOLITAN AREA
LIMITED-SCOPE REVIEW**

The following assessment area was reviewed using limited-scope examination procedures. Through these procedures, conclusions regarding the institution's CRA performance are drawn from the review of available facts and data, including performance and demographic information. The limited-scope review revealed the bank's CRA performance in this assessment is consistent with the area that received a full-scope review. Please refer to the tables in Appendix D for additional information regarding this area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LAKELAND ASSESSMENT AREA

As previously stated, the bank's assessment areas have changed since the previous exam. For 2014-2016, the Lakeland assessment area consisted of all of Polk County, which makes up the Lakeland-Winter Haven, Florida MSA. For 2017, the Lakeland assessment area consists of a portion of Polk County. The bank has a very small presence in this assessment area. The bank operates one branch in a moderate-income census tract. According to the June 30, 2017 FDIC Summary of Deposits Report, Pilot Bank ranked 15th in deposit market share with \$18.2 million or 0.27 percent of total deposits in the assessment area. There are 17 other financial institutions with 111 branches in the Lakeland assessment area.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE LAKELAND
ASSESSMENT AREA**

The limited-scope review revealed the bank's CRA performance in this assessment area is consistent with the area that received a full-scope review. While the geographic performance in Lakeland was weaker than the bank's performance in Tampa, it did not impact the bank's overall rating.

Please refer to the tables in Appendix D for additional information regarding the assessment area.

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED January 1, 2014 through December 31 , 2017			
FINANCIAL INSTITUTION Pilot Bank, Tampa, Florida		PRODUCTS REVIEWED Small Business Loans	
AFFILIATE(S) National Aircraft Finance Co.	AFFILIATE RELATIONSHIP Finance Company; Wholly owned subsidiary	PRODUCTS REVIEWED None	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
<i>ASSESSMENT AREA</i>	<i>TYPE OF EXAMINATION</i>	<i>BRANCHES VISITED</i>	<i>OTHER INFORMATION</i>
Tampa-St. Petersburg-Clearwater, Florida MSA Portions of Hillsborough County Portions of Pasco County Portions of Pinellas County	Full Scope	None	None
Lakeland-Winter Haven, Florida MSA Portions of Polk County	Limited-scope	None	None

APPENDIX B – DEFINITIONS AND GENERAL INFORMATION

Definitions

ATM	Automated Teller Machine
CDC	Community Development Corporation
CDFI	Community Development Financial Institution
CRA	Community Reinvestment Act (Regulation BB)
FDIC	Federal Deposit Insurance Corporation
FFIEC	Federal Financial Institutions Examination Council
HMDA	Home Mortgage Disclosure Act (Regulation C)
HUD	Department of Housing and Urban Development
LMI	Low- and Moderate-Income
LTD	Loan-to-Deposit
LTV	Loan-to-Value Ratio
MD	Metropolitan Division
MSA	Metropolitan Statistical Area
OMB	Office of Management and Budget
REIS	Regional Economic Information System
SBA	Small Business Administration
USDA	United States Department of Agriculture

Rounding Convention

Because the percentages presented in tables were rounded to the nearest tenth in most cases, some columns may not total exactly 100 percent.

General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Pilot Bank prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of May 14, 2018. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX C – GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of MSAs. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language. Affordable housing (including multi-family 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System (Board), Office of the Comptroller of the Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC) have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- I. Low-or moderate-income geographies;
- II. Designated disaster areas; or
- III. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, FDIC, and OCC, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

Effective January 19, 2010, the Board, the OCC, and the FDIC revised the definition of community development to include loans, investments, and services by financial institutions that-

- I. Support, enable or facilitate projects or activities that meet the "eligible uses" criteria described in Section 2301(c) of the Housing and Economic Recovery Act of 2008 (HERA), Public Law 110-289, 122 Stat. 2654, as amended, and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development in accordance with the Neighborhood Stabilization Program (NSP);
- II. Are provided no later than two years after the last date funds appropriated for the NSP are required to be spent by grantees; and
- III. Benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or areas outside the bank's assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

APPENDIX C – GLOSSARY (Continued)

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives 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 (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do business or have banking offices in a MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multi-family (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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

APPENDIX C – GLOSSARY (Continued)

Metropolitan area (MA): A MSA or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Multi-family: Refers to a residential structure that contains five or more units.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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

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

Rated area: A rated area is a state or multistate MA. 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 multistate MA, the institution will receive a rating for the multistate MA.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Call Report and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

APPENDIX D

Combined Demographics Report

Assessment Area: FL Lakeland

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	5	3.2	2,767	1.8	904	32.7	31,848	20.3
Moderate-income	36	23.4	34,777	22.1	6,874	19.8	29,313	18.6
Middle-income	76	49.4	83,287	53.0	8,566	10.3	32,628	20.8
Upper-income	36	23.4	36,391	23.1	1,765	4.9	63,433	40.3
Unknown-income	1	0.6	0	0.0	0	0.0	0	0.0
Total Assessment Area	154	100.0	157,222	100.0	18,109	11.5	157,222	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,981	2,045	1.3	29.3	3,592	51.5	1,344	19.3
Moderate-income	62,254	30,950	19.2	49.7	19,029	30.6	12,275	19.7
Middle-income	153,613	88,103	54.7	57.4	32,057	20.9	33,453	21.8
Upper-income	54,699	40,110	24.9	73.3	7,803	14.3	6,786	12.4
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	277,547	161,208	100.0	58.1	62,481	22.5	53,858	19.4
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,203	4.3	1,069	4.1	124	7.8	10	5.3
Moderate-income	5,489	19.8	5,053	19.5	404	25.4	32	16.9
Middle-income	13,679	49.4	12,815	49.5	769	48.3	95	50.3
Upper-income	7,309	26.4	6,961	26.9	296	18.6	52	27.5
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	27,680	100.0	25,898	100.0	1,593	100.0	189	100.0
Percentage of Total Businesses:			93.6		5.8		.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	15	2.9	13	2.8	2	4.4	0	0.0
Moderate-income	117	22.9	104	22.4	12	26.7	1	100.0
Middle-income	255	49.9	232	49.9	23	51.1	0	0.0
Upper-income	124	24.3	116	24.9	8	17.8	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	511	100.0	465	100.0	45	100.0	1	100.0
Percentage of Total Farms:			91.0		8.8		.2	

2016 FFIEC Census Data and 2016 D&B Information

APPENDIX D (Continued)

Combined Demographics Report

Assessment Area: FL Lakeland

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	8.2	2,049	4.8	905	44.2	9,273	21.5
Moderate-income	13	26.5	10,892	25.3	2,909	26.7	8,224	19.1
Middle-income	22	44.9	21,238	49.3	1,778	8.4	8,960	20.8
Upper-income	10	20.4	8,932	20.7	382	4.3	16,654	38.6
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	49	100.0	43,111	100.0	5,974	13.9	43,111	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	4,294	1,204	2.9	28.0	2,387	55.6	703	16.4
Moderate-income	22,502	9,661	23.4	42.9	8,126	36.1	4,715	21.0
Middle-income	40,110	20,872	50.5	52.0	12,724	31.7	6,514	16.2
Upper-income	14,232	9,573	23.2	67.3	2,701	19.0	1,958	13.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	81,138	41,310	100.0	50.9	25,938	32.0	13,890	17.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	517	5.7	456	5.5	59	8.3	2	4.3
Moderate-income	2,167	23.8	1,958	23.4	199	28.1	10	21.3
Middle-income	3,984	43.7	3,681	44.0	282	39.8	21	44.7
Upper-income	2,447	26.8	2,265	27.1	168	23.7	14	29.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	9,115	100.0	8,360	100.0	708	100.0	47	100.0
Percentage of Total Businesses:			91.7		7.8		.5	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	2.6	1	1.4	1	16.7	0	0.0
Moderate-income	10	13.2	10	14.3	0	0.0	0	0.0
Middle-income	39	51.3	37	52.9	2	33.3	0	0.0
Upper-income	25	32.9	22	31.4	3	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	76	100.0	70	100.0	6	100.0	0	.0
Percentage of Total Farms:			92.1		7.9		.0	

2017 FFIEC Census Data and 2016 D&B Information

APPENDIX D (Continued)

Geographic Distribution of Small Business Loans

Assessment Area: FL Lakeland

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2014, 2015, 2016				
	Bank				Small Businesses
	Count		Dollar		
#	%	\$ (000s)	\$ %	%	
Low	0	0.0%	\$0	0.0%	4.1%
Moderate	0	0.0%	\$0	0.0%	19.5%
Middle	1	25.0%	\$20	4.9%	49.5%
Upper	3	75.0%	\$389	95.1%	26.9%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$409</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

Geographic Distribution of Small Business Loans

Assessment Area: FL Lakeland

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2017				
	Bank				Small Businesses
	Count		Dollar		
#	%	\$ (000s)	\$ %	%	
Low	0	0.0%	\$0	0.0%	5.5%
Moderate	1	14.3%	\$60	8.9%	23.4%
Middle	4	57.1%	\$127	18.9%	44.0%
Upper	2	28.6%	\$484	72.1%	27.1%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>\$671</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2017 FFIEC Census Data and 2016 D&B Information

APPENDIX D (Continued)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: FL Lakeland

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2014, 2015, 2016				
		Bank				Total Businesses
#	Count	\$ (000s)		%		
		%	\$		%	
BUSINESS REVENUE	\$1million or Less	4	100.0%	\$409	100.0%	93.6%
	Over \$1 Million	0	0.0%	\$0	0.0%	5.8%
	<i>Total Rev. available</i>	4	100.0%	\$409	100.0%	99.4%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.7%
	<i>Total</i>	4	100.0%	\$409	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	2	50.0%	\$30	7.3%	
	\$100,001 - \$250,000	2	50.0%	\$379	92.7%	
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	4	100.0%	\$409	100.0%	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	2	50.0%	\$30	7.3%	
	\$100,001 - \$250,000	2	50.0%	\$379	92.7%	
	\$250,001 - \$1 Million	0	0.0%	\$0	0.0%	
	<i>Total</i>	4	100.0%	\$409	100.0%	

Originations & Purchases
2016 FFIEC Census Data and 2016 D&B Information

APPENDIX D (Continued)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: FL Lakeland

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2017				
		Bank				Total Businesses
#	%	\$ (000s)		%		
BUSINESS REVENUE	\$1million or Less	7	100.0%	\$671	100.0%	91.7%
	Over \$1 Million	0	0.0%	\$0	0.0%	7.8%
	<i>Total Rev. available</i>	7	100.0%	\$671	100.0%	99.5%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.5%
	<i>Total</i>	7	100.0%	\$671	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	5	71.4%	\$187	27.9%	
	\$100,001 - \$250,000	1	14.3%	\$150	22.4%	
	\$250,001 - \$1 Million	1	14.3%	\$334	49.8%	
	<i>Total</i>	7	100.0%	\$671	100.0%	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	5	71.4%	\$187	27.9%	
	\$100,001 - \$250,000	1	14.3%	\$150	22.4%	
	\$250,001 - \$1 Million	1	14.3%	\$334	49.8%	
	<i>Total</i>	7	100.0%	\$671	100.0%	

Originations & Purchases
2017 FFIEC Census Data and 2016 D&B Information