

PUBLIC DISCLOSURE

June 11, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**First Florida Integrity Bank
3560 Kraft Road
Naples, Florida 34105**

RSSD ID NUMBER: 3591282

**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.

TABLE OF CONTENTS

| | PAGE |
|---|-------------|
| INSTITUTION’S CRA RATING | |
| Institution’s Community Reinvestment Act (CRA) Rating..... | 1 |
| Summary of Major Factors Supporting Rating..... | 1 |
| INSTITUTION | |
| Scope of Examination..... | 2 |
| Description of Institution..... | 3 |
| Conclusions with Respect to Performance Tests..... | 5 |
| RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS..... | 7 |
| FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW..... | 7 |
| METROPOLITAN AREA – NAPLES MSA – FULL-SCOPE REVIEW | |
| Description of Institution’s Operations..... | 8 |
| Conclusions with Respect to Performance Tests..... | 14 |
| METROPOLITAN AREA – FORT MYERS – LIMITED-SCOPE REVIEW | |
| Description of Institution’s Operations..... | 24 |
| Conclusions with Respect to Performance Tests..... | 24 |
| METROPOLITAN AREA – TAMPA – LIMITED-SCOPE REVIEW | |
| Description of Institution’s Operations..... | 26 |
| Conclusions with Respect to Performance Tests..... | 26 |
| APPENDICES | |
| Appendix A – Scope of Examination..... | 27 |
| Appendix B – Definitions and General Information..... | 28 |
| Appendix C – Glossary..... | 29 |
| Appendix D – Limited-Scope Charts..... | 32 |

INSTITUTION'S CRA RATING

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

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The following table indicates the performance level of First Florida Integrity Bank with respect to the lending and community development tests.

| PERFORMANCE LEVELS | First Florida Integrity Bank | |
|---------------------------|-------------------------------------|-----------------------------------|
| | PERFORMANCE TESTS | |
| | Lending Test | Community Development Test |
| Outstanding | | |
| Satisfactory | X | X |
| Needs to Improve | | |
| Substantial Noncompliance | | |

**Note: The lending test and the community development test are weighted equally when arriving at an overall rating.

Major factors supporting the institution's rating include:

- The bank's loan-to-deposit ratio was more than reasonable.
- A majority of loans were made in the assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of loans reflects reasonable penetration among borrowers of different income levels and businesses of different sizes.
- The bank's community development performance demonstrates adequate responsiveness to community development needs in its assessment area through community development loans, qualified investments, and community development services.
- 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, as well as the economic and demographic characteristics of its defined assessment areas. First Florida Integrity Bank's (FFIB) CRA performance evaluation was based on CRA activities within its assessment area using the Interagency Intermediate Small Institution Examination Procedures. Under these procedures, institutions meeting the threshold size are evaluated using two separately rated tests: a lending test and a community development test, which includes an evaluation of community development loans, investments, and services in light of community needs within the bank's assessment areas and the bank's capacity.

A full-scope review was conducted on the bank's Naples, Florida assessment area. The other two assessment areas, Tampa and Fort Myers, Florida, were evaluated using limited-scope procedures. When determining the overall rating, the greatest weight was placed on the bank's performance in the Naples assessment area because a majority of the bank's branches, deposits, and loans are in this area.

The evaluation included an analysis of HMDA-reportable and small business loans originated from January 1, 2015, through December 31, 2017. Given the bank's asset size and offices located in a metropolitan statistical area (MSA), it submits annual reports about its residential real estate loan originations and applications, pursuant to the Home Mortgage Disclosure Act (HMDA). These loans are referred to as "HMDA-reportable" loans in this evaluation. A small business loan is defined as a business loan with an original amount of \$1 million or less and typically is either secured by nonfarm or nonresidential real estate or classified as a commercial loan. FFIB reported a greater volume of small business loans than HMDA-reportable loans by number of loans; therefore, small business lending was given more weight than HMDA-reportable lending in evaluating the bank's lending performance.

For the community development test, the examination covered community development loans, qualified investments, and community development services from January 1, 2015 through March 31, 2018. The CRA defines a community development activity as one that has a primary purpose of providing: affordable housing for, or community services targeted to, low- or moderate-income persons; promoting economic development by financing small businesses or farms; or revitalizing or stabilizing low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies. Community development activities must benefit the assessment area or a larger statewide or regional area that includes the assessment area.

As part of this evaluation, several community contacts were made with local community and economic development representatives who are familiar with the economic and demographic characteristics as well as community development opportunities in the full-scope assessment area. Information obtained from these contacts 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 contacts is included in the applicable section of the evaluation.

DESCRIPTION OF INSTITUTION

FFIB is a community bank headquartered in Naples, Florida. The bank has one wholly-owned subsidiary, First National Title and Closing Services, and its parent company is TGR Financial, Inc. FFIB consummated membership in the Federal Reserve System as a State of Florida chartered financial institution on June 28, 2014. The bank’s primary focus is commercial-related lending. FFIB offers an array of traditional personal and business deposit and credit products.

Branch Offices

FFIB operates six branches in the Naples assessment area, which includes four branches in Naples, one on Marco Island, and one in the Ave Maria/Immokalee area. In 2015 and 2016, two branches were in middle- income tracts and four in upper-income tracts. The branch distribution changed slightly in 2017 due to the census change, and one branch is in a middle income tract and five branches are in upper-income tracts. In the Tampa assessment area, the bank has one branch in an upper-income tract; there was no change in 2017.

All branches have ATMs, which includes four stand-alone ATMs in the Naples assessment area and one in the Fort Myers assessment area. Since the previous evaluation, the bank has not opened or closed any branches. However, the bank opened one stand-alone ATM in Naples in a moderate-income tract in 2015 and closed one stand-alone ATM in Naples in a low-income tract in 2017. A stand-alone, deposit-taking ATM was added in 2016 in Lee County in the Fort Myers assessment area, which is located in a tract that was classified as middle-income in 2016 and reclassified as moderate-income in 2017. However, this ATM was modified to cash-only in 2017, and the bank operates no other branches in this assessment area.

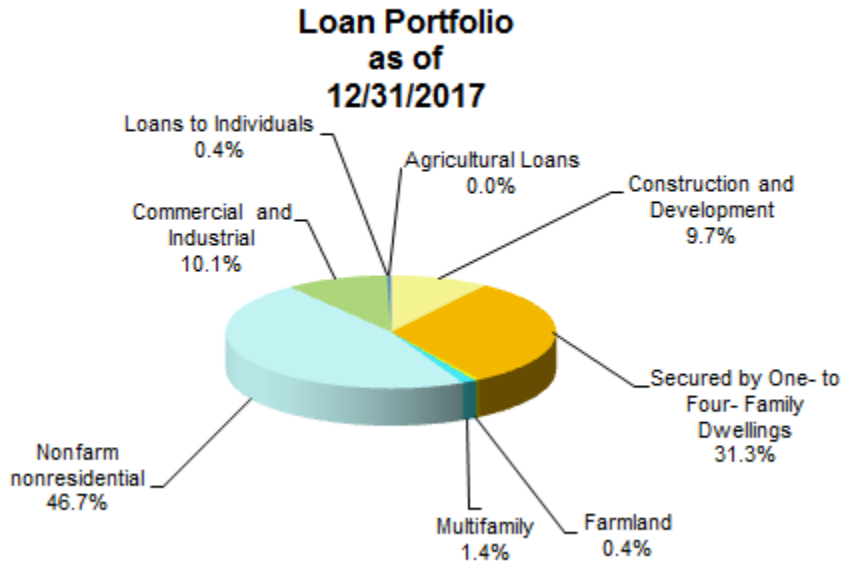
Loan Portfolio

According to the March 31, 2018 Report of Condition (ROC), the bank’s assets totaled \$1.4 billion, an increase of approximately \$433.7 million since the bank’s previous CRA evaluation conducted by the Federal Reserve Bank of Atlanta on June 1, 2015.

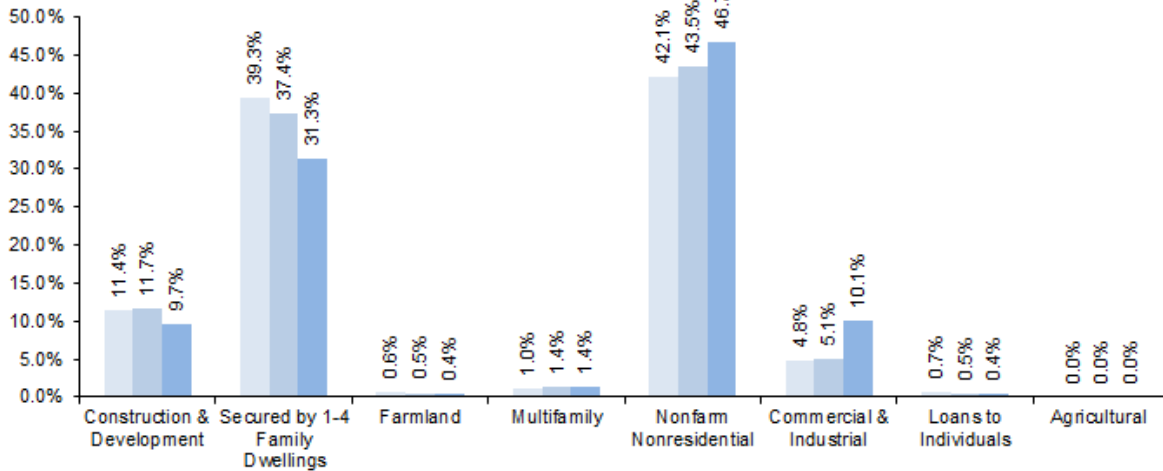
The following table and graphs show the composition of the loan portfolio according to the Consolidated Report of Condition and Income (Call Report).

| COMPOSITION OF LOAN PORTFOLIO | | | | | | |
|---|------------------|----------------|------------------|----------------|------------------|----------------|
| Loan Type | 12/31/2017 | | 12/31/2016 | | 12/31/2015 | |
| | \$ (000s) | Percent | \$ (000s) | Percent | \$ (000s) | Percent |
| Construction and Development | 92,164 | 9.7% | 105,148 | 11.7% | 91,638 | 11.4% |
| Secured by One- to Four- Family Dwellings | 298,896 | 31.3% | 337,038 | 37.4% | 314,854 | 39.3% |
| Other Real Estate: Farmland | 4,052 | 0.4% | 4,756 | 0.5% | 4,940 | 0.6% |
| Multifamily | 13,568 | 1.4% | 12,358 | 1.4% | 8,228 | 1.0% |
| Nonfarm nonresidential | 445,132 | 46.7% | 392,164 | 43.5% | 337,316 | 42.1% |
| Commercial and Industrial | 96,131 | 10.1% | 46,010 | 5.1% | 38,786 | 4.8% |
| Loans to Individuals | 3,567 | 0.4% | 4,584 | 0.5% | 5,619 | 0.7% |
| Agricultural Loans | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| Total | \$953,510 | 100.00% | \$902,058 | 100.00% | \$801,381 | 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.



Loan Portfolio Trend



As illustrated above, the bank’s loan portfolio as of December 31, 2017, consisted primarily of loans secured by nonfarm nonresidential properties (46.7 percent), followed by loans secured by one-to four-family dwellings (31.3 percent) and commercial and industrial loans (10.1 percent). One-to four-family lending experienced a decrease while nonfarm nonresidential lending increased during the period shown.

Credit Products

FFIB offers a variety of consumer and business loan products. Real estate products include construction and permanent loans, home improvement loans, home equity loans, and residential first and second mortgage loans. The bank offers fixed-rate and adjustable rate options and a first time home buyers program. FFIB business loan products include term loans, lines of credit, commercial real estate loans, and construction loans. As of March 2017, the bank stopped offering portfolio residential mortgage products and now offers residential mortgage products as a correspondent lender through a brokering agreement.

Assessment Areas

For purposes of the CRA, First Florida Integrity Bank has defined three assessment areas, which are listed below.

- Naples – all of Collier County, which comprises the Naples-Immokalee-Marco Island, Florida MSA
- Tampa – a portion of Hillsborough County, which is part of the Tampa-St. Petersburg-Clearwater, Florida MSA
- Fort Myers – all of Lee County, which comprises the Cape Coral–Fort Myers, Florida MSA

It should be noted that the bank has no branches in the Fort Myers assessment area; however, because the bank had a deposit-taking ATM in this assessment area during this review period, performance in this assessment area is considered for this evaluation.

CRA Compliance

First Florida Integrity 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 June 1, 2015, under the Intermediate Small Institution Examination Procedures.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TEST

LENDING TEST

Overview

FFIB’s overall performance rating for the lending test is satisfactory. The bank’s lending performance was evaluated using an analysis of HMDA loans and small business loans originated between January 1, 2015, and December 31, 2017. The loan-to-deposit (LTD) ratio is more than reasonable given the institution’s size, financial condition, and assessment area credit needs. A majority of the loans were originated in the assessment area. The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. The distribution of loans reflects reasonable penetration among customers of different income levels and businesses of different sizes. Performance context information, such as competition, the bank’s capacity, and demographic and economic conditions, was also considered in the evaluation of the bank’s lending performance. The bank’s lending performance in the limited-scope assessment areas varied. One limited-scope assessment area was consistent with the overall performance of the full-scope assessment area, while performance in the other limited-scope assessment area was weaker than the overall performance of the full-scope assessment area.

Loan-to-Deposit (LTD) Ratio

The bank’s net LTD ratio reflects its level of lending activity, and its lending levels show a more than reasonable responsiveness to meeting the overall assessment area’s credit needs. FFIB’s net average LTD ratio for the twelve quarters ending December 31, 2017, was 87.9 percent. The bank’s average LTD ratio was compared to the average LTD ratios of two other financial institutions of similar asset size with branch offices in the assessment areas. The average LTD ratios for these two financial institutions were 66.7 percent and 88.2 percent.

Assessment Area Concentration

The bank originated a majority of total loans to borrowers and businesses residing in or located within the bank’s assessment areas. The table below shows, by product type, the number and percentage of loans reviewed that were located inside and outside of the bank’s assessment areas.

Lending Inside and Outside the Assessment Area

| Loan Types | Inside | | | | Outside | | | |
|---------------------------------|------------|-------------|------------------|-------------|------------|-------------|-----------------|-------------|
| | # | % | \$(000s) | % | # | % | \$(000s) | % |
| Home Purchase - Conventional | 159 | 72.3 | \$96,204 | 78.7 | 61 | 27.7 | \$26,095 | 21.3 |
| Multi-Family Housing | 1 | 100.0 | \$500 | 100.0 | 0 | 0.0 | \$0 | 0.0 |
| Refinancing | 33 | 86.8 | \$17,870 | 89.2 | 5 | 13.2 | \$2,169 | 10.8 |
| Total HMDA related | 193 | 74.5 | \$114,574 | 80.2 | 66 | 25.5 | \$28,264 | 19.8 |
| Small Business | 342 | 83.6 | \$98,472 | 77.4 | 67 | 16.4 | \$28,779 | 22.6 |
| Total Small Bus. related | 342 | 83.6 | \$98,472 | 77.4 | 67 | 16.4 | \$28,779 | 22.6 |
| TOTAL LOANS | 535 | 80.1 | \$213,046 | 78.9 | 133 | 19.9 | \$57,043 | 21.1 |

Note: Affiliate loans not included

As indicated in the table above, 74.5 percent of the HMDA-reportable loans (by number) and 83.6 percent of small business loans (by number) were to borrowers or businesses in the bank’s assessment areas. This level of lending indicates the bank’s willingness to originate loans that meet the credit needs of its assessment areas.

Distribution of Lending by Geography, Borrower Income, and Business Size

The geographic and borrower distribution of HMDA-reportable and small business lending was compared with available demographic and aggregate information. Performance context issues including the bank’s business strategy and information from community contacts were also taken into consideration. Considering these factors, FFIB’s geographic distribution of HMDA-reportable and small business loans reflects reasonable dispersion throughout the assessment areas. Additionally, the overall distribution of lending to borrowers of different income levels and to businesses of different sizes reflects reasonable penetration.

COMMUNITY DEVELOPMENT TEST

The bank’s community development performance is satisfactory. Considering the bank’s capacity and the need for and availability of opportunities in its assessment areas, the bank demonstrates adequate responsiveness to community development needs through a combination of community development loans, qualified investments, and community development services. During the review period, the bank provided community development loans totaling \$18.0 million; new investments of \$2.0 million; contributions of approximately \$93,000; and 913 hours of community development services. The bank also maintained a balance of approximately \$1.0 million in prior period investments.

The majority of community development activities benefited the Naples assessment area, although the bank provided \$328,000 in community development loans, \$3,500 in contributions, and 186 hours of services that benefited a broader region that includes the bank’s assessment areas. The loans benefiting a broader region were participation loans through a community development financial institution (CDFI) that serves the state of

Florida. The loans were for the construction and permanent financing of affordable multifamily housing. The majority of the services that benefited a broader region were related to the community development purpose of economic development and involved bank employees serving on the boards or committees of organizations that provide consulting services, workshops, or financing to help small businesses grow and succeed. Of note is one employee's participation on the Emergency Bridge Loan Committee of the Florida Small Business Development Center, which reviewed applications for bridge loans from small businesses that suffered physical damage or economic injury as a result of Hurricane Irma in 2017. This participation shows timely responsiveness to an important community development issue affecting the bank's market area.

More detail on the bank's community development performance in each assessment area is included in subsequent sections of 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 examination. The bank is in compliance with the substantive provisions of antidiscrimination laws and regulations.

METROPOLITAN AREA
FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NAPLES, FLORIDA ASSESSMENT AREA

Overview

The Naples assessment area includes all of Collier County, which is the only county in the Naples-Immokalee-Marco Island MSA. Naples, Immokalee, and Marco Island are the principal cities of the MSA. According to the 2017 census data, the assessment area consists of 74 census tracts, which include 6 low-income tracts; 15 moderate-income tracts; 26 middle-income tracts; 26 upper-income tracts; and one unknown income tract. FFIB had six branches in the assessment area as of December 31, 2017. Of the six branches, two are located in middle-income tracts and four are in upper-income tracts. Deposits in the assessment area totaled \$933 million as of June 30, 2017.

Population Information

The Naples MSA continues to experience significant growth. Population in the bank’s assessment area was estimated at 372,880 in 2017¹, representing an increase of 16.0 percent from the 2010 census. This growth rate was slightly greater than Florida’s statewide growth rate of 11.6 percent.² There are three municipalities in Collier County that represent approximately 8.9 percent of the population: Naples, Everglades City, and Marco Island. The remaining population resides in 12 unincorporated communities.³

Income Characteristics

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the relevant area. The following table sets forth the estimated median family income for 2015, 2016, and 2017 for the Naples MSA. It also provides a breakdown of the ranges of the estimated annual income based on income level.

Borrower Income Levels
Naples-Immokalee-Marco Island, FL MSA

| FFIEC Estimated Median Family Income | | Low | Moderate | Middle | Upper |
|--------------------------------------|-----------------|--------------|---------------------|---------------------|--------------------|
| | | 0 - 49.99% | 50% - 79.99% | 80% - 119.99% | 120% - & above |
| 2015 | \$66,500 | 0 - \$33,249 | \$33,250 - \$53,199 | \$53,200 - \$79,799 | \$79,800 - & above |
| 2016 | \$65,700 | 0 - \$32,849 | \$32,850 - \$52,559 | \$52,560 - \$78,839 | \$78,840 - & above |
| 2017 | \$68,300 | 0 - \$34,149 | \$34,150 - \$54,639 | \$54,640 - \$81,959 | \$81,960 - & above |

¹ US Census Bureau. Accessed June 27, 2018; available from <https://www.census.gov/quickfacts/fact/table/fl.colliercountyflorida/PST045217>

² US Census Bureau. Accessed June 27, 2018; available from <https://www.census.gov/quickfacts/fact/table/fl.colliercountyflorida/PST120217#viewtop>

³ Collier County Government; available at: <http://www.colliergov.net/Modules/ShowDocument.aspx?documentid=43859>

The estimated median family income for the Naples MSA was \$66,500 for 2015, \$65,700 for 2016, and \$68,300 for 2017. According to the 2017 FFIEC census data, there were 87,665 families in the assessment area. Of those families, 20.8 percent were low-income, 17.7 percent were moderate-income, 19.3 percent were middle-income, and 42.2 percent were upper-income. Of the total families, 9.1 percent had incomes below the poverty level.

Data from the Bureau of Economic Analysis (BEA) indicates that in 2016, the Naples MSA had a per capita personal income (PCPI) of \$84,101. This PCPI ranked 5th in the United States and was 137 percent of the state average of \$61,472 and 171 percent of the national average of \$49,246. The median household income for Naples is currently \$84,830, which is 73 percent higher than the Florida average and 53 percent higher than the national average.⁴ This data indicates this is a very high income market, and there may be challenges with housing affordability and HMDA lending opportunities for low- and moderate-income households.

Housing Characteristics

The 2017 FFIEC census data shows 201,582 housing units in the assessment area. Of the total units, 46.5 percent were owner occupied, 17.9 percent were rental units, and 35.6 percent were vacant. Only 29.2 percent of the housing units in low-income tracts and 41.4 percent of the units in moderate-income tracts were owner occupied, indicating that there could be challenges in making mortgage loans in these tracts. The median age of the housing stock in the assessment area was 29 years, and the median housing value was \$272,818, compared with \$159,000 statewide. The high median housing value makes it difficult for low- and moderate-income individuals to afford homes.

The Board of County Commissioners of Collier County is trying to address the housing affordability issue and the number of cost burdened households in the county. In Collier County, two out of five households are cost burdened (which is defined as paying more than 30 percent of household income for housing) and one out of five households is severely cost-burdened (meaning they spend more than 50 percent of household income on housing). Public safety, health care, education and service workers as well as entry/middle level professionals are most likely to be cost-burdened in Collier County, and these sectors make up over 50 percent of all jobs in the county. Additionally, these workers are responsible for the high quality lifestyle that makes the county appealing. In addition to workers in the job sectors mentioned above, there is a significant concern for the residents that fall into the following categories: low- and moderate-income seniors, mental health and support services, and the very low-income. There is virtually no housing available to these residents. Many have to be housed outside of the county, if available. As a result, many experience a lack of services, especially relative to other Florida counties.⁵

Employment Statistics

Naples is heavily populated with retirees who comprise 49.3 percent of the population. According to SmartAsset, a New York financial services company, Naples is ranked third nationally for the best place in Florida to retire. As a result, health care and personal services have become major factors in the economy. There are 27 doctor's offices per 1,000 people.⁶ Naples Community Hospital, Publix Supermarket, Wal-Mart, and Collier County School District are Naples' major employers.⁷

⁴ BEA: Accessed on June 27, 2018.

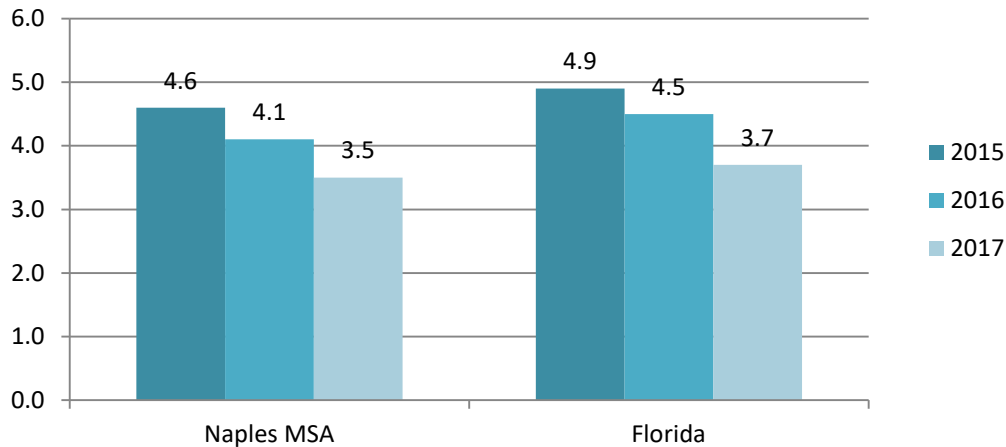
⁵ Collier County Government; available at: <https://www.colliercountyfl.gov/home/showdocument?id=71125>

⁶ Naples Daily News, "Naples ranked No. 1 city in state for retirees" Accessed June 27, 2018; available from: <http://archive.naplesnews.com/business/local/naples-ranked-no-1-city-in-state-for-retirees-2da69728-0422-0a44-e053-0100007f05f1-371583041.html/>

⁷ SW Florida Economic Development Alliance; Accessed on June 28, 2018; available from: <https://swfleda.com/top-100-employers/>

The following table shows the unemployment rates percentages for the bank’s assessment area and the State of Florida. Unemployment rates are slightly lower in the Naples MSA compared to the state of Florida.

Unemployment Rates - Naples



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

Competition

The bank operates in a highly competitive banking market that includes regional and national financial institutions. According to the June 30, 2017 FDIC Summary of Deposits report, 38 financial institutions operated 152 branches in the assessment area with \$17.3 billion in total deposits. FFIB ranked 5th in deposit market share with 5.4 percent of total deposits and six branches in the market area. Key Bank held the highest deposit market share with 18.9 percent of total deposits and one branch in the market.

The 2017 market peer report showing the number of originations and purchases of HMDA-reportable loans indicates that FFIB ranked 65th out of 626 reporters in the assessment area with market share of 0.2 percent. Wells Fargo Bank, Lend US, Quicken, JPMorgan Chase, and Pennymac Loan Services were the largest HMDA reporters in the area. As for small business lending, market share data reports for 2017 indicate that FFIB ranked 5th with a market share of 5.4 percent. American Express Bank FSB, a large national issuer of business-purpose credit cards, had the largest market share at 28.8 percent. Bank of America, Citibank and Chase Bank were the other major CRA reporters in the assessment area.

Community Contacts and Community Development Opportunities

As part of the CRA examination, information was obtained from a local economic development organization and from small business organizations. As mentioned previously, the largest economic challenge in Collier County is workforce housing. Working and living in Naples is cost prohibitive due to the lack of affordable housing. The economy in Naples is slowly improving. The region has experienced a growth of entrepreneurship due partially to the impact of the economic downturn, which led people to work for themselves due to decreased employment opportunities. Some development is occurring in the Immokalee area; however, the area is still challenged by transportation and other infrastructure deficiencies. Those who live in Immokalee and commute have about a 30 minute drive to job centers in Naples. Transportation is also a barrier in Collier County, which is evidenced by limited public transportation hours and service that is not available in areas where it is most needed.

Assessment Area Demographics

The following tables provide demographic characteristics of the Naples' assessment area used to analyze the bank's CRA performance. The first table is based on 2016 FFIEC census data along with 2016 Dun & Bradstreet (D&B) information and is used for the analysis of 2015 and 2016 CRA performance. The second table is based on 2017 FFIEC census data and 2016 D&B information and is used for analysis of 2017 CRA performance. The release of the 2017 FFIEC census data resulted in some changes in income level classifications.

Combined Demographics Report

Assessment Area: Naples 2016

| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
|--|----------------------------------|---|--------------------------|-------------------------|--|-----------------------------|---------------------------|--------------|
| | # | % | # | % | # | % | # | % |
| Low-income | 6 | 8.1 | 4,181 | 5.2 | 1,603 | 38.3 | 17,150 | 21.1 |
| Moderate-income | 15 | 20.3 | 15,305 | 18.9 | 1,780 | 11.6 | 14,862 | 18.3 |
| Middle-income | 28 | 37.8 | 35,999 | 44.4 | 1,934 | 5.4 | 15,449 | 19 |
| Upper-income | 24 | 32.4 | 25,650 | 31.6 | 1,070 | 4.2 | 33,674 | 41.5 |
| Unknown-income | 1 | 1.4 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 74 | 100.0 | 81,135 | 100.0 | 6,387 | 7.9 | 81,135 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 8,154 | 2,191 | 2.4 | 26.9 | 3,532 | 43.3 | 2,431 | 29.8 |
| Moderate-income | 33,145 | 15,007 | 16.4 | 45.3 | 7,875 | 23.8 | 10,263 | 31 |
| Middle-income | 84,139 | 42,071 | 46 | 50 | 10,889 | 12.9 | 31,179 | 37.1 |
| Upper-income | 69,091 | 32,128 | 35.2 | 46.5 | 5,824 | 8.4 | 31,139 | 45.1 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 194,529 | 91,397 | 100.0 | 47.0 | 28,120 | 14.5 | 75,012 | 38.6 |
| | Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | # |
| Low-income | 800 | 2.9 | 754 | 2.9 | 38 | 2.5 | 8 | 2.9 |
| Moderate-income | 3,552 | 12.9 | 3,379 | 13.1 | 141 | 9.2 | 32 | 11.6 |
| Middle-income | 11,931 | 43.2 | 11,248 | 43.6 | 586 | 38.2 | 97 | 35.3 |
| Upper-income | 11,311 | 41 | 10,405 | 40.4 | 768 | 50.1 | 138 | 50.2 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 27,594 | 100.0 | 25,786 | 100.0 | 1,533 | 100.0 | 275 | 100.0 |
| Percentage of Total Businesses: | | | | 93.4 | | 5.6 | | 1.0 |
| | Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | # |
| Low-income | 22 | 10.5 | 16 | 8.4 | 6 | 31.6 | 0 | 0 |
| Moderate-income | 35 | 16.7 | 30 | 15.7 | 5 | 26.3 | 0 | 0 |
| Middle-income | 96 | 45.7 | 91 | 47.6 | 5 | 26.3 | 0 | 0 |
| Upper-income | 57 | 27.1 | 54 | 28.3 | 3 | 15.8 | 0 | 0 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 210 | 100.0 | 191 | 100.0 | 19 | 100.0 | 0 | .0 |
| Percentage of Total Farms: | | | | 91.0 | | 9.0 | | .0 |

2016 FFIEC Census Data and 2016 D&B Information

Combined Demographics Report

Assessment Area: Naples 2017

| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
|--|----------------------------------|---|--------------------------|-------------------------|--|-----------------------------|---------------------------|--------------|
| | # | % | # | % | # | % | # | % |
| Low-income | 6 | 8.1 | 4,106 | 4.7 | 1,627 | 39.6 | 18,278 | 20.8 |
| Moderate-income | 15 | 20.3 | 17,381 | 19.8 | 3,098 | 17.8 | 15,489 | 17.7 |
| Middle-income | 26 | 35.1 | 35,130 | 40.1 | 2,147 | 6.1 | 16,908 | 19.3 |
| Upper-income | 26 | 35.1 | 31,048 | 35.4 | 1,147 | 3.7 | 36,990 | 42.2 |
| Unknown-income | 1 | 1.4 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 74 | 100.0 | 87,665 | 100.0 | 8,019 | 9.1 | 87,665 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 7,284 | 2,124 | 2.3 | 29.2 | 3,424 | 47 | 1,736 | 23.8 |
| Moderate-income | 36,919 | 15,285 | 16.3 | 41.4 | 10,215 | 27.7 | 11,419 | 30.9 |
| Middle-income | 76,674 | 38,746 | 41.3 | 50.5 | 13,667 | 17.8 | 24,261 | 31.6 |
| Upper-income | 80,705 | 37,578 | 40.1 | 46.6 | 8,849 | 11 | 34,278 | 42.5 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 201,582 | 93,733 | 100.0 | 46.5 | 36,155 | 17.9 | 71,694 | 35.6 |
| | Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | # |
| Low-income | 860 | 3.1 | 795 | 3.1 | 53 | 3.5 | 12 | 4.4 |
| Moderate-income | 3,486 | 12.6 | 3,350 | 13 | 111 | 7.2 | 25 | 9.1 |
| Middle-income | 11,168 | 40.5 | 10,516 | 40.8 | 555 | 36.2 | 97 | 35.3 |
| Upper-income | 12,080 | 43.8 | 11,125 | 43.1 | 814 | 53.1 | 141 | 51.3 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 27,594 | 100.0 | 25,786 | 100.0 | 1,533 | 100.0 | 275 | 100.0 |
| Percentage of Total Businesses: | | | | 93.4 | | 5.6 | | 1.0 |
| | Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | # |
| Low-income | 24 | 11.4 | 18 | 9.4 | 6 | 31.6 | 0 | 0 |
| Moderate-income | 34 | 16.2 | 29 | 15.2 | 5 | 26.3 | 0 | 0 |
| Middle-income | 82 | 39 | 78 | 40.8 | 4 | 21.1 | 0 | 0 |
| Upper-income | 70 | 33.3 | 66 | 34.6 | 4 | 21.1 | 0 | 0 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 210 | 100.0 | 191 | 100.0 | 19 | 100.0 | 0 | .0 |
| Percentage of Total Farms: | | | | 91.0 | | 9.0 | | .0 |

2017 FFIEC Census Data and 2016 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

FFIB's overall performance rating for the lending test is satisfactory. The geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Additionally, the bank's distribution of loans among customers of different income levels and businesses of different sizes reflects reasonable penetration. The bank's lending performance was evaluated using an analysis of HMDA-reportable and small business loans originated between January 1, 2015 and December 31, 2017. FFIB originated more small business loans than HMDA-reportable loans during the review period; therefore, small business lending was given greater consideration in evaluating the bank's lending performance.

Loans originated in 2015 and 2016 were analyzed using 2016 FFIEC census data, while loans originated in 2017 were analyzed using 2017 FFIEC census data. Therefore, in the discussions of the geographic distribution of loans and lending to borrowers of different incomes and businesses of different sizes, separate tables are presented depicting lending in 2015 and 2016 and lending in 2017.

Geographic Distribution of Loans

The geographic distribution of HMDA-reportable and small business lending was compared to available demographic information. Performance context issues, including the performance of other lenders in the market, were also taken into consideration. Considering these factors, the bank's geographic distribution of loans reflects reasonable dispersion throughout the bank's assessment area and does not reveal any unexplained gaps in lending patterns.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA-reportable loans reflects reasonable dispersion throughout the assessment area. The following table shows the geographic distribution of FFIB's HMDA-reportable loans for 2015 and 2016 within the Naples assessment area and includes a comparison to the aggregate HMDA-reportable lending for 2015 and 2016. Aggregate lending data is the combined total of lending activity reported by all lenders subject to HMDA in the MSA.

Geographic Distribution of HMDA Loans

Assessment Area: Naples

| PRODUCT TYPE | Tract Income Levels | Bank Lending & Demographic Data Comparison | | | | | Bank & Aggregate Lending Comparison | | | | | | | | | | | |
|------------------|---------------------|--|---------------|-----------------|---------------|----------------------|-------------------------------------|---------------|---------------|-----------------|---------------|---------------|-----------|---------------|---------------|-----------------|---------------|---------------|
| | | 2016, 2015 | | | | | 2015 | | | | | | 2016 | | | | | |
| | | Bank | | | | Owner Occupied Units | Count | | Dollar | | | | Count | | Dollar | | | |
| | | Count | Dollar | | | | Bank | Agg | Bank | Agg | | | Bank | Agg | Bank | Agg | | |
| # | % | \$ (000s) | % | % | # | % | % | \$ (000s) | % | % | # | % | % | \$ (000s) | % | % | | |
| HOME PURCHASE | Low | 1 | 0.8% | \$148 | 0.2% | 2.4% | 0 | 0.0% | 2.2% | \$0 | 0.0% | 1.1% | 1 | 1.7% | 2.1% | \$148 | 0.5% | 1.5% |
| | Moderate | 7 | 5.5% | \$1,335 | 1.7% | 16.4% | 4 | 5.7% | 15.0% | \$794 | 1.7% | 10.8% | 3 | 5.2% | 14.1% | \$541 | 1.7% | 10.4% |
| | Middle | 66 | 51.6% | \$29,363 | 37.2% | 46.0% | 35 | 50.0% | 51.8% | \$20,058 | 42.0% | 41.2% | 31 | 53.4% | 56.3% | \$9,305 | 29.9% | 47.6% |
| | Upper | 54 | 42.2% | \$48,035 | 60.9% | 35.2% | 31 | 44.3% | 31.1% | \$26,871 | 56.3% | 46.9% | 23 | 39.7% | 27.5% | \$21,164 | 67.9% | 40.5% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>128</i> | <i>100.0%</i> | <i>\$78,881</i> | <i>100.0%</i> | <i>100.0%</i> | <i>70</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$47,723</i> | <i>100.0%</i> | <i>100.0%</i> | <i>58</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$31,158</i> | <i>100.0%</i> | <i>100.0%</i> |
| REFINANCE | Low | 0 | 0.0% | \$0 | 0.0% | 2.4% | 0 | 0.0% | 1.3% | \$0 | 0.0% | 0.6% | 0 | 0.0% | 1.4% | \$0 | 0.0% | 0.6% |
| | Moderate | 3 | 11.1% | \$1,060 | 8.3% | 16.4% | 1 | 11.1% | 13.0% | \$349 | 8.8% | 8.2% | 2 | 11.1% | 12.1% | \$711 | 8.1% | 7.7% |
| | Middle | 11 | 40.7% | \$3,257 | 25.6% | 46.0% | 4 | 44.4% | 51.7% | \$1,070 | 27.0% | 40.3% | 7 | 38.9% | 52.3% | \$2,187 | 25.0% | 40.6% |
| | Upper | 13 | 48.1% | \$8,403 | 66.1% | 35.2% | 4 | 44.4% | 34.0% | \$2,545 | 64.2% | 50.9% | 9 | 50.0% | 34.2% | \$5,858 | 66.9% | 51.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>27</i> | <i>100.0%</i> | <i>\$12,720</i> | <i>100.0%</i> | <i>100.0%</i> | <i>9</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$3,964</i> | <i>100.0%</i> | <i>100.0%</i> | <i>18</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$8,756</i> | <i>100.0%</i> | <i>100.0%</i> |
| HOME IMPROVEMENT | Low | 0 | 0.0% | \$0 | 0.0% | 2.4% | 0 | 0.0% | 0.9% | \$0 | 0.0% | 0.3% | 0 | 0.0% | 1.5% | \$0 | 0.0% | 0.6% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 16.4% | 0 | 0.0% | 15.4% | \$0 | 0.0% | 8.2% | 0 | 0.0% | 12.1% | \$0 | 0.0% | 6.9% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 46.0% | 0 | 0.0% | 59.3% | \$0 | 0.0% | 35.5% | 0 | 0.0% | 58.7% | \$0 | 0.0% | 48.9% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 35.2% | 0 | 0.0% | 24.5% | \$0 | 0.0% | 56.1% | 0 | 0.0% | 27.7% | \$0 | 0.0% | 43.5% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| MULTIFAMILY | Low | 0 | 0.0% | \$0 | 0.0% | 3.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 11.1% | \$0 | 0.0% | 8.0% |
| | Moderate | 1 | 100.0% | \$500 | 100.0% | 13.8% | 1 | 100.0% | 45.8% | \$500 | 100.0% | 47.1% | 0 | 0.0% | 22.2% | \$0 | 0.0% | 41.7% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 39.5% | 0 | 0.0% | 20.8% | \$0 | 0.0% | 42.3% | 0 | 0.0% | 33.3% | \$0 | 0.0% | 37.5% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 43.7% | 0 | 0.0% | 33.3% | \$0 | 0.0% | 10.6% | 0 | 0.0% | 33.3% | \$0 | 0.0% | 12.8% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>1</i> | <i>100.0%</i> | <i>\$500</i> | <i>100.0%</i> | <i>100.0%</i> | <i>1</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$500</i> | <i>100.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| HMDA TOTALS | Low | 1 | 0.6% | \$148 | 0.2% | 2.4% | 0 | 0.0% | 1.9% | \$0 | 0.0% | 0.9% | 1 | 1.3% | 1.8% | \$148 | 0.4% | 1.4% |
| | Moderate | 11 | 7.1% | \$2,895 | 3.1% | 16.4% | 6 | 7.5% | 14.4% | \$1,643 | 3.1% | 11.2% | 5 | 6.6% | 13.4% | \$1,252 | 3.1% | 10.4% |
| | Middle | 77 | 49.4% | \$32,620 | 35.4% | 46.0% | 39 | 48.8% | 51.9% | \$21,128 | 40.5% | 40.9% | 38 | 50.0% | 55.0% | \$11,492 | 28.8% | 45.1% |
| | Upper | 67 | 42.9% | \$56,438 | 61.3% | 35.2% | 35 | 43.8% | 31.8% | \$29,416 | 56.4% | 47.1% | 32 | 42.1% | 29.8% | \$27,022 | 67.7% | 43.2% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>156</i> | <i>100.0%</i> | <i>\$92,101</i> | <i>100.0%</i> | <i>100.0%</i> | <i>80</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$52,187</i> | <i>100.0%</i> | <i>100.0%</i> | <i>76</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$39,914</i> | <i>100.0%</i> | <i>100.0%</i> |

Originations & Purchases
 2016 FFIEC Census Data and 2010 ACS Data

The bank originated 156 HMDA-reportable loans in 2015 and 2016, including one loan in low-income tracts (0.6 percent) and 11 loans (7.1 percent) in moderate-income tracts. By comparison, 2.4 percent of owner-occupied units were located in low-income tracts and 16.4 percent of owner-occupied units were located in moderate-income tracts within the assessment area. The bank’s percentage of loans in both low- and moderate-income tracts was considerably lower than the percentage of owner-occupied units in both geographies. In addition, the bank’s lending was below aggregate in both low- and moderate-income tracts in 2015 and 2016.

Performance context factors such as a lack of affordable housing options help explain the bank’s geographic lending performance, but most importantly there are not very many mortgage lending opportunities in low- and moderate-income tracts. As noted above, there are only 2.4 percent and 16.4 percent owner-occupied housing units located in the low- and moderate-income level tracts, respectively. Furthermore, rental and vacant housing units are more prevalent in the low-income tracts than owner-occupied.

The following table shows the geographic distribution of HMDA-reportable loans in the Naples assessment area for 2017. Aggregate lending data for 2017 was not available.

Geographic Distribution of HMDA Loans

Assessment Area: Naples

| PRODUCT TYPE | Tract Income Levels | Bank Lending & Demographic Data Comparison | | | | |
|------------------|---------------------|--|---------------|-----------------|---------------|------------------------|
| | | 2017 | | | | |
| | | Bank | | Dollar | | Owner Occupied Units % |
| # | % | \$ (000s) | \$ % | | | |
| HOME PURCHASE | Low | 0 | 0.0% | \$0 | 0.0% | 2.3% |
| | Moderate | 4 | 18.2% | \$822 | 8.2% | 16.3% |
| | Middle | 10 | 45.5% | \$3,082 | 30.8% | 41.3% |
| | Upper | 8 | 36.4% | \$6,112 | 61.0% | 40.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>22</i> | <i>100.0%</i> | <i>\$10,016</i> | <i>100.0%</i> | <i>100.0%</i> |
| REFINANCE | Low | 0 | 0.0% | \$0 | 0.0% | 2.3% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 16.3% |
| | Middle | 1 | 50.0% | \$96 | 4.7% | 41.3% |
| | Upper | 1 | 50.0% | \$1,960 | 95.3% | 40.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>2</i> | <i>100.0%</i> | <i>\$2,056</i> | <i>100.0%</i> | <i>100.0%</i> |
| HOME IMPROVEMENT | Low | 0 | 0.0% | \$0 | 0.0% | 2.3% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 16.3% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 41.3% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 40.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| MULTI FAMILY | Low | 0 | 0.0% | \$0 | 0.0% | 2.0% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 16.3% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 33.6% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 48.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| HMDA TOTALS | Low | 0 | 0.0% | \$0 | 0.0% | 2.3% |
| | Moderate | 4 | 16.7% | \$822 | 6.8% | 16.3% |
| | Middle | 11 | 45.8% | \$3,178 | 26.3% | 41.3% |
| | Upper | 9 | 37.5% | \$8,072 | 66.9% | 40.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>24</i> | <i>100.0%</i> | <i>\$12,072</i> | <i>100.0%</i> | <i>100.0%</i> |

Originations & Purchases

As mentioned previously, the bank discontinued offering portfolio residential mortgage products in March 2017, which resulted in a lower HMDA volume than in previous years. The bank originated 24 HMDA-reportable loans in 2017, with no loans in low-income tracts and four loans (16.7 percent) in moderate-income tracts. By comparison, 2.3 percent of owner-occupied units are located in low-income tracts and 16.3 percent of owner-occupied units are located in moderate-income tracts within the assessment area. The bank's percentage

of loans in moderate-income tracts was similar than the percentage of owner-occupied units in these geographies. Home purchase loans was the bank’s primary residential lending product in 2017, and the geographic distribution of lending for this product was fairly consistent with the overall HMDA-reportable loan distribution.

Similar to 2015 and 2016, in 2017 there are a very low percentage of owner-occupied housing units located within the low- and moderate-income level tracts at 2.3 percent and 16.3 percent, respectively. Given the limited owner-occupied housing in the low- and moderate-income tracts and the bank’s decreased loan production, overall geographic distribution for HMDA lending is considered reasonable.

Small Business Lending

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. The following table shows the geographic distribution of small business loans by tract income level within the assessment area in 2015 and 2016 and includes a comparison to aggregate lending data for reference purposes. The CRA aggregate lenders’ data are the combined total of lending activity reported by all lenders subject to CRA loan data reporting requirements in the assessment area.

Geographic Distribution of Small Business Loans

Assessment Area: Naples

| Tract Income Levels | Bank Lending & Demographic Data Comparison | | | | | Bank & Aggregate Lending Comparison | | | | | | | | | | | |
|---------------------------|--|---------------|-----------------|---------------|---------------------|-------------------------------------|---------------|---------------|-----------------|---------------|---------------|-----------|---------------|---------------|-----------------|---------------|---------------|
| | 2016, 2015 | | | | | 2015 | | | | | 2016 | | | | | | |
| | Count | | Bank | | Small Businesses | Count | | Dollar | | | Count | | Dollar | | | | |
| | # | % | \$ (000s) | \$ % | | # | % | Agg % | \$ 000s | \$ % | Agg % | # | % | Agg % | \$ 000s | \$ % | Agg % |
| Low | 3 | 2.2% | \$250 | 0.7% | 2.9% | 1 | 2.0% | 2.1% | \$100 | 0.7% | 2.2% | 2 | 2.4% | 1.7% | \$150 | 0.7% | 1.9% |
| Moderate | 11 | 8.1% | \$3,405 | 8.9% | 13.1% | 5 | 9.8% | 10.6% | \$1,484 | 9.7% | 8.7% | 6 | 7.1% | 10.9% | \$1,921 | 8.4% | 8.6% |
| Middle | 53 | 39.3% | \$16,021 | 41.8% | 43.6% | 19 | 37.3% | 41.5% | \$6,494 | 42.3% | 41.0% | 34 | 40.5% | 41.7% | \$9,527 | 41.6% | 38.0% |
| Upper | 68 | 50.4% | \$18,610 | 48.6% | 40.4% | 26 | 51.0% | 45.1% | \$7,285 | 47.4% | 47.7% | 42 | 50.0% | 44.4% | \$11,325 | 49.4% | 50.7% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| Tr Unknown | 0 | 0.0% | \$0 | 0.0% | | 0 | 0.0% | 0.8% | \$0 | 0.0% | 0.5% | 0 | 0.0% | 1.4% | \$0 | 0.0% | 0.9% |
| <i>Total</i> | <i>135</i> | <i>100.0%</i> | <i>\$38,286</i> | <i>100.0%</i> | <i>100.0%</i> | <i>51</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$15,363</i> | <i>100.0%</i> | <i>100.0%</i> | <i>84</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$22,923</i> | <i>100.0%</i> | <i>100.0%</i> |

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

FFIB originated 135 small business loans inside the assessment area in 2015 and 2016. Three loans (2.2 percent) were made to small businesses in low-income tracts, which was slightly less than the small businesses located in these tracts at 2.9 percent. The bank’s lending in low-income tracts was comparable to aggregate in 2015 and greater than aggregate in 2016. The bank originated 11 loans (8.1 percent) of its reported small business loans in moderate-income tracts, compared to 13.1 percent of small businesses located in these geographies. The bank’s lending in moderate-income tracts was slightly below aggregate in 2015 and was below aggregate in 2016.

The following table shows the geographic distribution of small business loans by tract income level within the assessment area for 2017. Aggregate lending data was not available.

Geographic Distribution of Small Business Loans

Assessment Area: Naples

| Tract Income Levels | Bank Lending & Demographic Data Comparison | | | | |
|---------------------------|--|---------------|-----------------|---------------|---------------------|
| | 2017 | | | | |
| | Count | | Bank Dollar | | Small Businesses |
| | # | % | \$ (000s) | \$ % | % |
| Low | 6 | 5.3% | \$2,832 | 9.2% | 3.1% |
| Moderate | 4 | 3.5% | \$346 | 1.1% | 13.0% |
| Middle | 46 | 40.7% | \$11,976 | 38.9% | 40.8% |
| Upper | 57 | 50.4% | \$15,624 | 50.8% | 43.1% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| Tr Unknown | 0 | 0.0% | \$0 | 0.0% | |
| <i>Total</i> | <i>113</i> | <i>100.0%</i> | <i>\$30,778</i> | <i>100.0%</i> | <i>100.0%</i> |

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

In 2017, FFIB originated 113 small business loans inside the assessment area. Six loans (5.3 percent) were made to small businesses in low-income tracts, which was greater than the percentage of small businesses located in these tracts at 3.1 percent. The bank originated four loans or 3.5 percent of its reported small business loans in moderate-income tracts, compared to 13.0 percent of small businesses located in these geographies.

As mentioned previously, the bank operates in a highly competitive banking market that includes regional and national financial institutions; larger regional banks have obtained the majority of the small business lending opportunities in the assessment area via highly competitive loan pricing and terms. Given the high level of competition, the geographic distribution of small business loans is reasonable.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The overall distribution of loans by borrower income and business revenue size reflects reasonable penetration among individuals of different income levels and businesses of different sizes. For this analysis, the distribution of HMDA-reportable lending to borrowers of different income levels and small business lending to businesses of revenue sizes was compared to available demographic information. Performance context factors were also considered.

Residential Real Estate (HMDA) Lending

The distribution of HMDA-reportable lending by borrower income is considered reasonable when compared to the demographic characteristics of the community as well as to the performance of the aggregate lenders within the assessment area. The following table shows the distribution of the bank’s HMDA-reportable loans by the income level of borrowers for 2015 and 2016.

Borrower Distribution of HMDA Loans

Assessment Area: Naples

| PRODUCT TYPE | Borrower Income Levels | Bank Lending & Demographic Data | | | | | Bank & Aggregate Lending Comparison | | | | | | | | | | | |
|------------------|------------------------|---------------------------------|---------------|---------------------------|---------------|---------------|-------------------------------------|---------------|---------------|-----------------|---------------|---------------|-----------|---------------|---------------|-----------------|---------------|---------------|
| | | 2016, 2015 | | | | | 2015 | | | | | 2016 | | | | | | |
| | | Bank | | Families by Family Income | Count | | Dollar | | | Count | | Dollar | | | | | | |
| | | Count | Dollar | | Bank | Agg | Bank | Agg | Bank | Agg | Bank | Agg | | | | | | |
| # | % | \$(000s) | % | % | # | % | % | \$(000s) | % | % | # | % | % | \$(000s) | % | % | | |
| HOME PURCHASE | Low | 0 | 0.0% | \$0 | 0.0% | 21.1% | 0 | 0.0% | 2.4% | \$0 | 0.0% | 0.9% | 0 | 0.0% | 1.4% | \$0 | 0.0% | 0.5% |
| | Moderate | 6 | 4.7% | \$754 | 1.0% | 18.3% | 2 | 2.9% | 11.4% | \$260 | 0.5% | 5.6% | 4 | 6.9% | 10.3% | \$494 | 1.6% | 5.7% |
| | Middle | 9 | 7.0% | \$1,381 | 1.8% | 19.0% | 1 | 1.4% | 13.5% | \$208 | 0.4% | 8.5% | 8 | 13.8% | 16.4% | \$1,173 | 3.8% | 11.0% |
| | Upper | 102 | 79.7% | \$65,267 | 82.7% | 41.5% | 60 | 85.7% | 57.8% | \$38,173 | 80.0% | 72.9% | 42 | 72.4% | 58.2% | \$27,094 | 87.0% | 69.3% |
| | Unknown | 11 | 8.6% | \$11,479 | 14.6% | 0.0% | 7 | 10.0% | 15.0% | \$9,082 | 19.0% | 12.2% | 4 | 6.9% | 13.7% | \$2,397 | 7.7% | 13.5% |
| | <i>Total</i> | <i>128</i> | <i>100.0%</i> | <i>\$78,881</i> | <i>100.0%</i> | <i>100.0%</i> | <i>70</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$47,723</i> | <i>100.0%</i> | <i>100.0%</i> | <i>58</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$31,158</i> | <i>100.0%</i> | <i>100.0%</i> |
| REFINANCE | Low | 1 | 3.7% | \$188 | 1.5% | 21.1% | 0 | 0.0% | 4.3% | \$0 | 0.0% | 1.7% | 1 | 5.6% | 2.8% | \$188 | 2.1% | 1.1% |
| | Moderate | 2 | 7.4% | \$177 | 1.4% | 18.3% | 1 | 11.1% | 11.3% | \$107 | 2.7% | 5.5% | 1 | 5.6% | 10.4% | \$70 | 0.8% | 5.1% |
| | Middle | 1 | 3.7% | \$126 | 1.0% | 19.0% | 0 | 0.0% | 16.2% | \$0 | 0.0% | 10.1% | 1 | 5.6% | 15.9% | \$126 | 1.4% | 9.7% |
| | Upper | 19 | 70.4% | \$10,457 | 82.2% | 41.5% | 5 | 55.6% | 51.5% | \$2,670 | 67.4% | 66.9% | 14 | 77.8% | 54.8% | \$7,787 | 88.9% | 68.5% |
| | Unknown | 4 | 14.8% | \$1,772 | 13.9% | 0.0% | 3 | 33.3% | 16.7% | \$1,187 | 29.9% | 15.8% | 1 | 5.6% | 16.0% | \$585 | 6.7% | 15.5% |
| | <i>Total</i> | <i>27</i> | <i>100.0%</i> | <i>\$12,720</i> | <i>100.0%</i> | <i>100.0%</i> | <i>9</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$3,964</i> | <i>100.0%</i> | <i>100.0%</i> | <i>18</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$8,756</i> | <i>100.0%</i> | <i>100.0%</i> |
| HOME IMPROVEMENT | Low | 0 | 0.0% | \$0 | 0.0% | 21.1% | 0 | 0.0% | 5.1% | \$0 | 0.0% | 0.9% | 0 | 0.0% | 2.2% | \$0 | 0.0% | 0.8% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.3% | 0 | 0.0% | 16.2% | \$0 | 0.0% | 6.8% | 0 | 0.0% | 14.1% | \$0 | 0.0% | 6.2% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 19.0% | 0 | 0.0% | 23.4% | \$0 | 0.0% | 10.8% | 0 | 0.0% | 22.1% | \$0 | 0.0% | 13.5% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 41.5% | 0 | 0.0% | 48.7% | \$0 | 0.0% | 47.8% | 0 | 0.0% | 57.3% | \$0 | 0.0% | 73.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 6.6% | \$0 | 0.0% | 33.7% | 0 | 0.0% | 4.4% | \$0 | 0.0% | 6.4% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| MULTI FAMILY | Low | 0 | 0.0% | \$0 | 0.0% | 21.1% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.3% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 19.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 41.5% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | Unknown | 1 | 100.0% | \$500 | 100.0% | 0.0% | 1 | 100.0% | 100.0% | \$500 | 100.0% | 100.0% | 0 | 0.0% | 100.0% | \$0 | 0.0% | 100.0% |
| | <i>Total</i> | <i>1</i> | <i>100.0%</i> | <i>\$500</i> | <i>100.0%</i> | <i>100.0%</i> | <i>1</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$500</i> | <i>100.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| HMDA TOTALS | Low | 1 | 0.6% | \$188 | 0.2% | 21.1% | 0 | 0.0% | 3.0% | \$0 | 0.0% | 1.1% | 1 | 1.3% | 1.9% | \$188 | 0.5% | 0.7% |
| | Moderate | 8 | 5.1% | \$931 | 1.0% | 18.3% | 3 | 3.8% | 11.4% | \$367 | 0.7% | 5.4% | 5 | 6.6% | 10.4% | \$564 | 1.4% | 5.4% |
| | Middle | 10 | 6.4% | \$1,507 | 1.6% | 19.0% | 1 | 1.3% | 14.6% | \$208 | 0.4% | 8.7% | 9 | 11.8% | 16.4% | \$1,299 | 3.3% | 10.3% |
| | Upper | 121 | 77.6% | \$75,724 | 82.2% | 41.5% | 65 | 81.3% | 55.5% | \$40,843 | 78.3% | 68.5% | 56 | 73.7% | 57.0% | \$34,881 | 87.4% | 67.1% |
| | Unknown | 16 | 10.3% | \$13,751 | 14.9% | 0.0% | 11 | 13.8% | 15.4% | \$10,769 | 20.6% | 16.3% | 5 | 6.6% | 14.4% | \$2,982 | 7.5% | 16.6% |
| | <i>Total</i> | <i>156</i> | <i>100.0%</i> | <i>\$92,101</i> | <i>100.0%</i> | <i>100.0%</i> | <i>80</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$52,187</i> | <i>100.0%</i> | <i>100.0%</i> | <i>76</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$39,914</i> | <i>100.0%</i> | <i>100.0%</i> |

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Of the bank’s 156 HMDA-reportable loans, 0.6 percent were originated to low-income borrowers, which was significantly below the 21.1 percent of low-income families in the assessment area. The bank made no HMDA loans to low-income borrowers in 2015 and one loan in 2016. However, aggregate lenders were also very challenged in making loans to these borrowers. The percentage of HMDA-reportable lending to moderate-income borrowers was 5.1 percent, which was also significantly below the 18.3 percent of moderate-income families in the assessment area. The bank’s performance was below aggregate lenders in both 2015 and 2016.

The following table shows the distribution of the bank’s HMDA-reportable loans by the income level of the borrowers for 2017. Aggregate lending data for 2017 was not available.

Borrower Distribution of HMDA Loans

Assessment Area: Naples

| PRODUCT TYPE | Borrower Income Levels | Bank Lending & Demographic Data Comparison | | | | |
|------------------|------------------------|--|---------------|---------------------------|---------------|---------------|
| | | 2017 | | | | |
| | | Bank | | Families by Family Income | | % |
| | | Count | Dollar | | | |
| # | % | \$ (000s) | \$ % | | % | |
| HOME PURCHASE | Low | 0 | 0.0% | \$0 | 0.0% | 20.8% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 17.7% |
| | Middle | 3 | 13.6% | \$659 | 6.6% | 19.3% |
| | Upper | 13 | 59.1% | \$5,325 | 53.2% | 42.2% |
| | Unknown | 6 | 27.3% | \$4,032 | 40.3% | 0.0% |
| | <i>Total</i> | <i>22</i> | <i>100.0%</i> | <i>\$10,016</i> | <i>100.0%</i> | <i>100.0%</i> |
| REFINANCE | Low | 0 | 0.0% | \$0 | 0.0% | 20.8% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 17.7% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 19.3% |
| | Upper | 2 | 100.0% | \$2,056 | 100.0% | 42.2% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>2</i> | <i>100.0%</i> | <i>\$2,056</i> | <i>100.0%</i> | <i>100.0%</i> |
| HOME IMPROVEMENT | Low | 0 | 0.0% | \$0 | 0.0% | 20.8% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 17.7% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 19.3% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 42.2% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| MULTI FAMILY | Low | 0 | 0.0% | \$0 | 0.0% | 20.8% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 17.7% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 19.3% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 42.2% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| HMDA TOTALS | Low | 0 | 0.0% | \$0 | 0.0% | 20.8% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 17.7% |
| | Middle | 3 | 12.5% | \$659 | 5.5% | 19.3% |
| | Upper | 15 | 62.5% | \$7,381 | 61.1% | 42.2% |
| | Unknown | 6 | 25.0% | \$4,032 | 33.4% | 0.0% |
| | <i>Total</i> | <i>24</i> | <i>100.0%</i> | <i>\$12,072</i> | <i>100.0%</i> | <i>100.0%</i> |

Originations & Purchases
2017 FFIEC Census Data and 2010 ACS Data

Of the bank’s 24 HMDA-reportable loans in 2017, no loans were originated to low-income borrowers, which is significantly below the 20.8 percent of low-income families in the assessment area. Also, the bank made no loans to moderate-income borrowers, while 17.7 percent of families in the assessment area are moderate-income.

There are several factors that may contribute to the bank’s weaker performance with HMDA lending to low- and moderate-income borrowers. First, the bank is not a significant HMDA lender in a very competitive banking market. Additionally, rising housing prices and the lack of affordable housing in the assessment area is making it very difficult for low- and moderate-income borrowers to purchase homes. Also, as discussed earlier, many households in the assessment area are considered cost burdened, meaning they pay more than 30 percent of their income on housing, and likely do not have the ability to save for a down payment needed for purchasing a home. The housing data supports the statements of community contacts that the lack of affordable and workforce housing is the biggest community development issue in the assessment area. As a result of these factors, overall, the bank’s performance is reasonable.

Small Business Lending

FFIB’s small business lending by business revenue size reflects reasonable penetration among businesses of different sizes. The following table shows, by business revenue and loan size, the number and dollar volume of small business loans originated in 2015 and 2016 and includes a comparison to available aggregate lending data.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Naples

| Business Revenue & Loan Size | | Bank Lending & Demographic Data Comparison 2016, 2015 | | | | | Bank & Aggregate Lending Comparison | | | | | | | | | | | |
|-----------------------------------|-------------------------|--|--------|----------|--------|---------------------|-------------------------------------|--------|--------|----------|--------|--------|----|--------|--------|----------|--------|--------|
| | | Bank | | | | Total Businesses | 2015 | | | 2016 | | | | | | | | |
| | | Count | | Dollar | | | # | % | % | Dollar | | Count | | | Dollar | | | |
| | | # | % | \$(000s) | % | Bank | | | | Agg | Bank | Agg | # | % | % | Bank | Agg | Bank |
| | | | | | | | | | | | | | | | | | | |
| BUSINESS REVENUE | \$1million or Less | 58 | 43.0% | \$16,434 | 42.9% | 93.4% | 27 | 52.9% | 54.2% | \$7,361 | 47.9% | 41.0% | 31 | 36.9% | 42.1% | \$9,073 | 39.6% | 34.7% |
| | Over \$1 Million | 66 | 48.9% | \$19,485 | 50.9% | 5.6% | 22 | 43.1% | | | | | 44 | 52.4% | | | | |
| | Total Rev. available | 124 | 91.9% | \$35,919 | 93.8% | 99.0% | 49 | 96.0% | | | | | 75 | 89.3% | | | | |
| | Rev. Not Known | 11 | 8.1% | \$2,367 | 6.2% | 1.0% | 2 | 3.9% | | | | | 9 | 10.7% | | | | |
| | Total | 135 | 100.0% | \$38,286 | 100.0% | 100.0% | 51 | 100.0% | | | | | 84 | 100.0% | | | | |
| LOAN SIZE | \$100,000 or Less | 42 | 31.1% | \$3,023 | 7.9% | | 13 | 25.5% | 95.5% | \$980 | 6.4% | 43.4% | 29 | 34.5% | 96.4% | \$2,043 | 8.9% | 53.4% |
| | \$100,001 - \$250,000 | 44 | 32.6% | \$8,887 | 23.2% | | 16 | 31.4% | 2.1% | \$3,412 | 22.2% | 13.5% | 28 | 33.3% | 1.6% | \$5,475 | 23.9% | 10.4% |
| | \$250,001 - \$1 Million | 49 | 36.3% | \$26,376 | 68.9% | | 22 | 43.1% | 2.4% | \$10,971 | 71.4% | 43.1% | 27 | 32.1% | 1.9% | \$15,405 | 67.2% | 36.1% |
| | Total | 135 | 100.0% | \$38,286 | 100.0% | | 51 | 100.0% | 100.0% | \$15,363 | 100.0% | 100.0% | 84 | 100.0% | 100.0% | \$22,923 | 100.0% | 100.0% |
| LOAN SIZE Rev \$1 Mill or Less | \$100,000 or Less | 16 | 27.6% | \$1,002 | 6.1% | | | | | | | | | | | | | |
| | \$100,001 - \$250,000 | 21 | 36.2% | \$4,314 | 26.3% | | | | | | | | | | | | | |
| | \$250,001 - \$1 Million | 21 | 36.2% | \$11,118 | 67.7% | | | | | | | | | | | | | |
| | Total | 58 | 100.0% | \$16,434 | 100.0% | | | | | | | | | | | | | |

Originations & Purchases
 Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
 2016 FFIEC Census Data and 2016 D&B Information

Of the 135 small business loans originated by the bank in 2015 and 2016, 58 loans (43.0 percent) were to businesses with annual gross revenues of \$1 million or less, as compared to the 93.4 percent of total businesses in the assessment area considered to be small businesses. However, the bank’s lending to small businesses in 2015 (52.9 percent) was similar to aggregate; lending to small businesses in 2016 (36.9 percent) was slightly below aggregate. The bank originated 37 loans (63.8 percent) to small businesses in amounts of \$250,000 or less, showing the bank’s willingness to lend to small businesses in smaller loan amounts, an important credit need in the community.

The following table shows the number and dollar volume of small business loans originated in 2017. Aggregate lending data for 2017 was not available.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Naples

| Business Revenue & Loan Size | | Bank Lending & Demographic Data Comparison | | | | |
|----------------------------------|-----------------------------|--|---------------|-----------------|---------------|------------------|
| | | 2017 | | | | Total Businesses |
| | | Bank | | \$ (000s) | | |
| | | Count | | | | |
| | | # | % | \$ | % | % |
| BUSINESS REVENUE | \$1million or Less | 39 | 34.5% | \$9,737 | 31.6% | 93.4% |
| | Over \$1 Million | 58 | 51.3% | \$17,198 | 55.9% | 5.6% |
| | <i>Total Rev. available</i> | 97 | 85.8% | \$26,935 | 87.5% | 99.0% |
| | Rev. Not Known | 16 | 14.2% | \$3,843 | 12.5% | 1.0% |
| | <i>Total</i> | <i>113</i> | <i>100.0%</i> | <i>\$30,778</i> | <i>100.0%</i> | <i>100.0%</i> |
| LOAN SIZE | \$100,000 or Less | 48 | 42.5% | \$2,896 | 9.4% | |
| | \$100,001 - \$250,000 | 23 | 20.4% | \$4,364 | 14.2% | |
| | \$250,001 - \$1 Million | 42 | 37.2% | \$23,518 | 76.4% | |
| | Over \$1 Million | 0 | 0.0% | \$0 | 0.0% | |
| | <i>Total</i> | <i>113</i> | <i>100.0%</i> | <i>\$30,778</i> | <i>100.0%</i> | |
| LOAN SIZE & Rev \$1 Mill or Less | \$100,000 or Less | 17 | 43.6% | \$933 | 9.6% | |
| | \$100,001 - \$250,000 | 9 | 23.1% | \$1,645 | 16.9% | |
| | \$250,001 - \$1 Million | 13 | 33.3% | \$7,159 | 73.5% | |
| | Over \$1 Million | 0 | 0.0% | \$0 | 0.0% | |
| | <i>Total</i> | <i>39</i> | <i>100.0%</i> | <i>\$9,737</i> | <i>100.0%</i> | |

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

Of the 113 small business loans originated by the bank in 2017, 9 loans (34.5 percent) were to businesses with annual gross revenues of \$1 million or less, as compared to the 93.4 percent of total businesses in the assessment area considered to be small businesses. However, the bank originated 26 loans (66.7 percent) to small businesses in amounts of \$250,000 or less, which shows the bank’s willingness to lend to small businesses in smaller loan amounts, an important credit need in the community.

COMMUNITY DEVELOPMENT TEST

The bank’s community development performance is satisfactory. Considering the bank’s capacity and the need for and availability of opportunities in the assessment area, the bank demonstrates adequate responsiveness to community development needs through a combination of community development loans, qualified investments, and community development services. During the review period, the bank provided community development loans totaling \$17.6 million, new investments of \$2.0 million, contributions of approximately \$69,800, and 623 hours of community development services in the Naples assessment area. The bank also maintained a balance of approximately \$651,000 in prior period investments that benefited this assessment area.

The largest of the three community development loans benefiting the Naples assessment area was a \$17.1 million loan that provided interim construction financing for water facility improvements to replace undersized and outdated water main infrastructure, improve water quality, and improve system reliability in a primarily low-income area of the county. The other community development loans were for the purchase of a child care center that serves primarily lower-income families and for the purchase of medical equipment for a clinic that serves primarily low-income and uninsured individuals.

During the review period, the bank made a \$2.0 million investment in a mortgage-backed security involving an affordable multifamily property. The bank made prior period investments in mortgage-backed securities involving single-family housing for low- or moderate-income individuals or in low- or moderate-income census tracts; these investments have a current balance of approximately \$651,000. In addition, the bank made approximately \$69,800 in contributions with a community development purpose. The majority of the contributions were related to community services benefiting primarily low- and moderate-income individuals and underprivileged youth. Bank support included sponsorship of financial literacy and fraud awareness classes, first-time homebuyer workshops, and financial management education for small businesses.

Bank representatives used their financial and technical expertise to provide financial services that benefit low- and moderate-income residents and small businesses in the assessment area. During the review period, bank staff contributed 623 hours of qualified community development services to community organizations serving the assessment area. Employees provided financial expertise primarily by teaching classes in financial literacy, budgeting, fraud awareness, and business financial management to low- and moderate-income individuals, youth, and senior citizens and small business entrepreneurs. Several classes were conducted in Spanish. Bank staff provided income tax preparation assistance to low- and moderate-income individuals and also served as board or committee members primarily of organizations engaged in providing community services targeted to low- and moderate-income individuals.

**METROPOLITAN AREA – FORT MYERS, FLORIDA
LIMITED-SCOPE REVIEW**

The Fort Myers 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. Please refer to the tables in Appendix D for additional information regarding this area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FORT MYERS ASSESSMENT AREA

The Fort Myers assessment area consists of all of Lee County, which makes up the Cape Coral-Fort Myers, Florida MSA. Based on 2017 FFIEC census data, the assessment area consists of 167 census tracts, seven (4.2 percent) low-income tracts and 42 (25.1 percent) moderate-income tracts. Of the total families in the assessment area, 20.8 percent are low-income, 18.5 percent are moderate-income, 19.7 percent are middle-income, and 41.1 percent are upper-income. The 2017 population of the assessment area was estimated to be 739,224.

As mentioned previously, FFIB opened a stand-alone, deposit-taking ATM in Lee County in September 2016. In April 2017, the ATM was modified to be cash-only. The ATM is in a tract currently classified as moderate-income. The FDIC Deposit Market Share Report from June 30, 2017, shows 35 banks operating 211 branches in the assessment area. As a result of not having any physical branches in the assessment area, FFIB does not have a deposit market share percentage.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FORT MYERS ASSESSMENT AREA

The bank originated ten HMDA-reportable loans during 2016 and one HMDA-reportable loan in 2017 in the assessment area. FFIB originated 40 small business loans during 2016 and 42 small business loans in 2017 in the assessment area. The bank's geographic distribution of loans reflects reasonable dispersion throughout the assessment area. The bank's distribution of loans reflects reasonable dispersion among customers of different income levels and to businesses of different sizes. Lending performance is consistent with the bank's overall performance.

Regarding community development activities, the bank made prior period investments in mortgage-backed securities involving single-family housing for low- or moderate-income individuals in the Fort Myers assessment area; these investments have a current balance of approximately \$352,000. During the review period, the bank made contributions totaling \$6,775 in support of financial education, affordable housing, and community services for low- and moderate-income individuals. In addition, bank staff provided 50 hours of community development services in the Fort Myers assessment area. The bank did not make any community development loans in this assessment area. Community development performance in the Fort Myers assessment area was below the bank's overall performance.

The following table compares conclusions regarding the bank’s performance in the Fort Myers, Florida limited-scope assessment area to the bank’s overall performance. Performance in this assessment area did not affect the overall rating.

| Performance in the Limited-Scope Review Metropolitan Assessment Area | | |
|---|---------------------|-----------------------------------|
| Assessment Area | Lending Test | Community Development Test |
| Fort Myers | Consistent | Not Consistent - Below |

**METROPOLITAN AREA – TAMPA, FLORIDA
LIMITED-SCOPE REVIEW**

The Tampa 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. Please refer to the tables in Appendix D for additional information regarding this area.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TAMPA ASSESSMENT AREA

The Tampa assessment area consists solely of the incorporated City of Tampa, which is part of the Tampa-St. Petersburg-Clearwater, Florida MSA. Based on 2017 FFIEC census data, the assessment area consists of 170 census tracts, including 28 (16.5 percent) low-income tracts and 47 (27.6 percent) moderate-income tracts. Of the total families in the assessment area, 27.6 percent are low-income, 17.6 percent are moderate-income, 16.1 percent are middle-income, and 38.6 percent are upper-income. The 2015 population of the assessment area was estimated to be 626,090.

FFIB operates one branch (including one ATM) in an upper-income tract in the Tampa assessment area. The FDIC Deposit Market Share Report from June 30, 2017 shows 51 banks operating 296 branches in the assessment area. FFIB ranked 36th with a 0.2 percent market share in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TAMPA ASSESSMENT AREA

The bank originated two HMDA-reportable loans in 2015 and 2016. The bank did not originate any HMDA-reportable loans during 2017. FFIB originated four small business loans during 2015 and 2016. In 2017, FFIB originated eight small business loans. The lending performance in this area is not consistent with the bank’s overall performance. The geographic distribution of loans for the review period is less than reasonable, while lending to businesses of different sizes is reasonable.

Regarding community development activities, the bank made contributions totaling \$12,875 and provided 54 hours of community development services in the assessment area. Contributions supported financial education classes for low- and moderate-income individuals and a loan guaranty program for small business entrepreneurs. Services included teaching financial education and first-time homebuyer classes to low- and moderate-income individuals and providing technical expertise to start-up businesses. The bank did not make any community development loans or investments in this assessment area. Community development performance in the Tampa assessment area was below the bank’s overall performance.

The following table compares conclusions regarding the bank’s performance in the Tampa, Florida limited-scope assessment area to the bank’s overall performance. Performance in this assessment area did not affect the overall rating.

| Performance in the Limited-Scope Review Metropolitan Assessment Area | | |
|---|------------------------|-----------------------------------|
| Assessment Area | Lending Test | Community Development Test |
| Tampa | Not Consistent - Below | Not Consistent - Below |

APPENDIX A

| SCOPE OF EXAMINATION | | | |
|--|-------------------------------|--------------------------|--------------------------|
| TIME PERIOD REVIEWED | | | |
| Lending Test: January 1, 2015, to December 31, 2017 | | | |
| Community Development Test: January 1, 2015, to March 31, 2018 | | | |
| First Florida Integrity Bank | | PRODUCTS REVIEWED | |
| Naples, Florida | | HMDA Loans | |
| | | Small Business Loans | |
| AFFILIATE(S) | AFFILIATE RELATIONSHIP | PRODUCTS REVIEWED | |
| N/A | N/A | N/A | |
| LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION | | | |
| ASSESSMENT AREA | TYPE OF EXAMINATION | BRANCHES VISITED | OTHER INFORMATION |
| Naples, Florida | Full-Scope Review | N/A | N/A |
| Ft. Myers, Florida | Limited-scope Review | N/A | N/A |
| Tampa, Florida | Limited-scope Review | N/A | N/A |

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 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 **First Florida Integrity Bank** prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of **June 11, 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.

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).

APPENDIX C – GLOSSARY (Continued)

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.

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.

APPENDIX C – GLOSSARY (Continued)

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 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 – LIMITED-SCOPE CHARTS

Combined Demographics Report

Assessment Area: Ft Myers 2016

| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
|--|----------------------------------|---|--------------------------|-------------------------|--|-----------------------------|---------------------------|--------------|
| | # | % | # | % | # | % | # | % |
| Low-income | 5 | 3 | 4,411 | 2.7 | 1,344 | 30.5 | 30,892 | 19 |
| Moderate-income | 32 | 19.2 | 27,458 | 16.9 | 4,214 | 15.3 | 30,886 | 19 |
| Middle-income | 80 | 47.9 | 86,515 | 53.1 | 5,796 | 6.7 | 34,898 | 21.4 |
| Upper-income | 48 | 28.7 | 44,541 | 27.3 | 1,390 | 3.1 | 66,249 | 40.7 |
| Unknown-income | 2 | 1.2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 167 | 100.0 | 162,925 | 100.0 | 12,744 | 7.8 | 162,925 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | | Rental | | Vacant | |
| | | # | % | % | # | % | # | % |
| Low-income | 10,760 | 2,430 | 1.3 | 22.6 | 5,440 | 50.6 | 2,890 | 26.9 |
| Moderate-income | 61,029 | 26,066 | 14.2 | 42.7 | 16,593 | 27.2 | 18,370 | 30.1 |
| Middle-income | 185,990 | 102,292 | 55.6 | 55 | 29,224 | 15.7 | 54,474 | 29.3 |
| Upper-income | 106,113 | 53,140 | 28.9 | 50.1 | 10,566 | 10 | 42,407 | 40 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 363,892 | 183,928 | 100.0 | 50.5 | 61,823 | 17.0 | 118,141 | 32.5 |
| | Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | # |
| Low-income | 1,473 | 3.3 | 1,293 | 3.1 | 166 | 7 | 14 | 4.3 |
| Moderate-income | 6,540 | 14.5 | 6,127 | 14.5 | 381 | 16 | 32 | 9.9 |
| Middle-income | 23,532 | 52.2 | 22,322 | 52.7 | 1,062 | 44.7 | 148 | 45.7 |
| Upper-income | 13,470 | 29.9 | 12,580 | 29.7 | 761 | 32 | 129 | 39.8 |
| Unknown-income | 47 | 0.1 | 40 | 0.1 | 6 | 0.3 | 1 | 0.3 |
| Total Assessment Area | 45,062 | 100.0 | 42,362 | 100.0 | 2,376 | 100.0 | 324 | 100.0 |
| Percentage of Total Businesses: | | | | 94.0 | | 5.3 | | .7 |
| | Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | # |
| Low-income | 5 | 1.7 | 4 | 1.4 | 1 | 8.3 | 0 | 0 |
| Moderate-income | 45 | 15.4 | 44 | 15.8 | 1 | 8.3 | 0 | 0 |
| Middle-income | 121 | 41.4 | 117 | 41.9 | 4 | 33.3 | 0 | 0 |
| Upper-income | 121 | 41.4 | 114 | 40.9 | 6 | 50 | 1 | 100 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 292 | 100.0 | 279 | 100.0 | 12 | 100.0 | 1 | 100.0 |
| Percentage of Total Farms: | | | | 95.5 | | 4.1 | | .3 |

2016 FFIEC Census Data and 2016 D&B Information

Combined Demographics Report

Assessment Area: Ft Myers 2017

| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
|--|----------------------------------|---|--------------------------|-------------------------|--|-----------------------------|---------------------------|--------------|
| | # | % | # | % | # | % | # | % |
| Low-income | 7 | 4.2 | 5,910 | 3.6 | 1,945 | 32.9 | 34,371 | 20.8 |
| Moderate-income | 42 | 25.1 | 37,663 | 22.7 | 7,613 | 20.2 | 30,610 | 18.5 |
| Middle-income | 60 | 35.9 | 71,586 | 43.2 | 6,820 | 9.5 | 32,556 | 19.7 |
| Upper-income | 56 | 33.5 | 50,476 | 30.5 | 2,045 | 4.1 | 68,098 | 41.1 |
| Unknown-income | 2 | 1.2 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 167 | 100.0 | 165,635 | 100.0 | 18,423 | 11.1 | 165,635 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | Rental | | Vacant | | |
| | | # | % | # | % | # | % | |
| Low-income | 13,065 | 3,624 | 2.1 | 27.7 | 6,678 | 51.1 | 2,763 | 21.1 |
| Moderate-income | 79,613 | 32,377 | 18.6 | 40.7 | 25,723 | 32.3 | 21,513 | 27 |
| Middle-income | 153,042 | 76,990 | 44.2 | 50.3 | 29,699 | 19.4 | 46,353 | 30.3 |
| Upper-income | 128,613 | 61,171 | 35.1 | 47.6 | 16,025 | 12.5 | 51,417 | 40 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 374,333 | 174,162 | 100.0 | 46.5 | 78,125 | 20.9 | 122,046 | 32.6 |
| | Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | |
| Low-income | 1,195 | 2.7 | 1,111 | 2.6 | 76 | 3.2 | 8 | 2.5 |
| Moderate-income | 9,524 | 21.1 | 8,849 | 20.9 | 621 | 26.1 | 54 | 16.7 |
| Middle-income | 18,653 | 41.4 | 17,776 | 42 | 761 | 32 | 116 | 35.8 |
| Upper-income | 15,643 | 34.7 | 14,586 | 34.4 | 912 | 38.4 | 145 | 44.8 |
| Unknown-income | 47 | 0.1 | 40 | 0.1 | 6 | 0.3 | 1 | 0.3 |
| Total Assessment Area | 45,062 | 100.0 | 42,362 | 100.0 | 2,376 | 100.0 | 324 | 100.0 |
| Percentage of Total Businesses: | | | 94.0 | | 5.3 | | .7 | |
| | Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | |
| Low-income | 4 | 1.4 | 4 | 1.4 | 0 | 0 | 0 | 0 |
| Moderate-income | 57 | 19.5 | 52 | 18.6 | 5 | 41.7 | 0 | 0 |
| Middle-income | 139 | 47.6 | 136 | 48.7 | 3 | 25 | 0 | 0 |
| Upper-income | 92 | 31.5 | 87 | 31.2 | 4 | 33.3 | 1 | 100 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 292 | 100.0 | 279 | 100.0 | 12 | 100.0 | 1 | 100.0 |
| Percentage of Total Farms: | | | 95.5 | | 4.1 | | .3 | |

2017 FFIEC Census Data and 2016 D&B Information

Borrower Distribution of HMDA Loans

Assessment Area: Ft Myers

| PRODUCT TYPE | Borrower Income Levels | Bank Lending & Demographic Data Comparison | | | | | Bank & Aggregate Lending Comparison | | | | | |
|------------------|------------------------|--|---------------|----------------|---------------|-----------------------------|-------------------------------------|---------------|---------------|----------------|---------------|---------------|
| | | 2016 | | | | | 2016 | | | | | |
| | | Bank | | | | Families by Family Income % | Count | | | Dollar | | |
| | | Count | | Dollar | | | Bank | Agg | Bank | Agg | | |
| # | % | \$ (000s) | \$ % | % | # | % | % | \$ (000s) | \$ % | \$ % | | |
| HOME PURCHASE | Low | 0 | 0.0% | \$0 | 0.0% | 19.0% | 0 | 0.0% | 2.8% | \$0 | 0.0% | 1.4% |
| | Moderate | 1 | 12.5% | \$150 | 2.1% | 19.0% | 1 | 12.5% | 14.7% | \$150 | 2.1% | 9.5% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 21.4% | 0 | 0.0% | 19.5% | \$0 | 0.0% | 15.4% |
| | Upper | 6 | 75.0% | \$6,815 | 96.5% | 40.7% | 6 | 75.0% | 49.7% | \$6,815 | 96.5% | 61.7% |
| | Unknown | 1 | 12.5% | \$97 | 1.4% | 0.0% | 1 | 12.5% | 13.3% | \$97 | 1.4% | 12.1% |
| | <i>Total</i> | <i>8</i> | <i>100.0%</i> | <i>\$7,062</i> | <i>100.0%</i> | <i>100.0%</i> | <i>8</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$7,062</i> | <i>100.0%</i> | <i>100.0%</i> |
| REFINANCE | Low | 0 | 0.0% | \$0 | 0.0% | 19.0% | 0 | 0.0% | 4.0% | \$0 | 0.0% | 2.0% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 19.0% | 0 | 0.0% | 11.8% | \$0 | 0.0% | 7.1% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 21.4% | 0 | 0.0% | 18.0% | \$0 | 0.0% | 13.3% |
| | Upper | 2 | 100.0% | \$2,336 | 100.0% | 40.7% | 2 | 100.0% | 46.8% | \$2,336 | 100.0% | 58.0% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 19.4% | \$0 | 0.0% | 19.7% |
| | <i>Total</i> | <i>2</i> | <i>100.0%</i> | <i>\$2,336</i> | <i>100.0%</i> | <i>100.0%</i> | <i>2</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$2,336</i> | <i>100.0%</i> | <i>100.0%</i> |
| HOME IMPROVEMENT | Low | 0 | 0.0% | \$0 | 0.0% | 19.0% | 0 | 0.0% | 5.6% | \$0 | 0.0% | 2.3% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 19.0% | 0 | 0.0% | 13.5% | \$0 | 0.0% | 8.2% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 21.4% | 0 | 0.0% | 23.4% | \$0 | 0.0% | 19.9% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 40.7% | 0 | 0.0% | 54.0% | \$0 | 0.0% | 64.6% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 3.4% | \$0 | 0.0% | 5.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| MULTI FAMILY | Low | 0 | 0.0% | \$0 | 0.0% | 19.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 19.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 21.4% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 40.7% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 100.0% | \$0 | 0.0% | 100.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| HMDA TOTALS | Low | 0 | 0.0% | \$0 | 0.0% | 19.0% | 0 | 0.0% | 3.3% | \$0 | 0.0% | 1.5% |
| | Moderate | 1 | 10.0% | \$150 | 1.6% | 19.0% | 1 | 10.0% | 13.8% | \$150 | 1.6% | 8.5% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 21.4% | 0 | 0.0% | 19.1% | \$0 | 0.0% | 14.5% |
| | Upper | 8 | 80.0% | \$9,151 | 97.4% | 40.7% | 8 | 80.0% | 48.9% | \$9,151 | 97.4% | 59.2% |
| | Unknown | 1 | 10.0% | \$97 | 1.0% | 0.0% | 1 | 10.0% | 15.0% | \$97 | 1.0% | 16.2% |
| | <i>Total</i> | <i>10</i> | <i>100.0%</i> | <i>\$9,398</i> | <i>100.0%</i> | <i>100.0%</i> | <i>10</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$9,398</i> | <i>100.0%</i> | <i>100.0%</i> |

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

APPENDIX D – LIMITED-SCOPE CHARTS (Continued)

Geographic Distribution of HMDA Loans

Assessment Area: Ft Myers

| PRODUCT TYPE | Tract Income Levels | Bank Lending & Demographic Data Comparison 2016 | | | | | Bank & Aggregate Lending Comparison 2016 | | | | | |
|------------------|---------------------------|---|---------------|----------------------------|---------------|---------------|---|---------------|---------------|----------------|---------------|---------------|
| | | Bank | | Owner Occupied Units | Count | | Dollar | | | | | |
| | | Count | Dollar | | Bank | Agg | Bank | Agg | Bank | Agg | | |
| # | % | \$ (000s) | \$ % | % | # | % | % | \$ (000s) | \$ % | \$ % | | |
| HOME PURCHASE | Low | 0 | 0.0% | \$0 | 0.0% | 1.3% | 0 | 0.0% | 1.7% | \$0 | 0.0% | 1.4% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 14.2% | 0 | 0.0% | 13.1% | \$0 | 0.0% | 9.8% |
| | Middle | 5 | 62.5% | \$6,469 | 91.6% | 55.6% | 5 | 62.5% | 55.2% | \$6,469 | 91.6% | 48.8% |
| | Upper | 3 | 37.5% | \$593 | 8.4% | 28.9% | 3 | 37.5% | 30.0% | \$593 | 8.4% | 40.0% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>8</i> | <i>100.0%</i> | <i>\$7,062</i> | <i>100.0%</i> | <i>100.0%</i> | <i>8</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$7,062</i> | <i>100.0%</i> | <i>100.0%</i> |
| REFINANCE | Low | 0 | 0.0% | \$0 | 0.0% | 1.3% | 0 | 0.0% | 0.6% | \$0 | 0.0% | 0.4% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 14.2% | 0 | 0.0% | 10.4% | \$0 | 0.0% | 7.5% |
| | Middle | 2 | 100.0% | \$2,336 | 100.0% | 55.6% | 2 | 100.0% | 56.0% | \$2,336 | 100.0% | 48.2% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 28.9% | 0 | 0.0% | 33.1% | \$0 | 0.0% | 43.9% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>2</i> | <i>100.0%</i> | <i>\$2,336</i> | <i>100.0%</i> | <i>100.0%</i> | <i>2</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$2,336</i> | <i>100.0%</i> | <i>100.0%</i> |
| HOME IMPROVEMENT | Low | 0 | 0.0% | \$0 | 0.0% | 1.3% | 0 | 0.0% | 0.4% | \$0 | 0.0% | 0.1% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 14.2% | 0 | 0.0% | 11.9% | \$0 | 0.0% | 8.0% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 55.6% | 0 | 0.0% | 58.8% | \$0 | 0.0% | 49.9% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 28.9% | 0 | 0.0% | 28.9% | \$0 | 0.0% | 41.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.1% | \$0 | 0.0% | 1.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| MULTI FAMILY | Low | 0 | 0.0% | \$0 | 0.0% | 7.8% | 0 | 0.0% | 5.2% | \$0 | 0.0% | 2.7% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 15.0% | 0 | 0.0% | 31.0% | \$0 | 0.0% | 37.6% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 39.7% | 0 | 0.0% | 46.6% | \$0 | 0.0% | 27.8% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 37.4% | 0 | 0.0% | 17.2% | \$0 | 0.0% | 31.9% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| HMDA TOTALS | Low | 0 | 0.0% | \$0 | 0.0% | 1.3% | 0 | 0.0% | 1.3% | \$0 | 0.0% | 1.1% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 14.2% | 0 | 0.0% | 12.3% | \$0 | 0.0% | 9.8% |
| | Middle | 7 | 70.0% | \$8,805 | 93.7% | 55.6% | 7 | 70.0% | 55.5% | \$8,805 | 93.7% | 48.1% |
| | Upper | 3 | 30.0% | \$593 | 6.3% | 28.9% | 3 | 30.0% | 30.9% | \$593 | 6.3% | 40.9% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>10</i> | <i>100.0%</i> | <i>\$9,398</i> | <i>100.0%</i> | <i>100.0%</i> | <i>10</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$9,398</i> | <i>100.0%</i> | <i>100.0%</i> |

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business Loans

Assessment Area: Ft Myers

| Tract Income Levels | Bank Lending & Demographic Data Comparison | | | | | Bank & Aggregate Lending Comparison | | | | | |
|---------------------------|--|---------------|-----------------|---------------|---------------------|-------------------------------------|---------------|-----------------|-----------------|---------------|---------------|
| | 2016 | | | | | 2016 | | | | | |
| | Count | | Bank Dollar | | Small Businesses | Count | | | Dollar | | |
| | # | % | \$ (000s) | \$ % | | Bank # | Agg % | Bank \$ 000s | Agg \$ % | Agg \$ % | |
| Low | 3 | 7.5% | \$801 | 7.1% | 3.1% | 3 | 7.5% | 3.0% | \$801 | 7.1% | 5.3% |
| Moderate | 6 | 15.0% | \$2,503 | 22.2% | 14.5% | 6 | 15.0% | 12.1% | \$2,503 | 22.2% | 12.5% |
| Middle | 19 | 47.5% | \$4,490 | 39.8% | 52.7% | 19 | 47.5% | 47.2% | \$4,490 | 39.8% | 43.3% |
| Upper | 12 | 30.0% | \$3,480 | 30.9% | 29.7% | 12 | 30.0% | 36.5% | \$3,480 | 30.9% | 38.0% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.1% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.2% |
| Tr Unknown | 0 | 0.0% | \$0 | 0.0% | | 0 | 0.0% | 1.1% | \$0 | 0.0% | 0.7% |
| <i>Total</i> | <i>40</i> | <i>100.0%</i> | <i>\$11,274</i> | <i>100.0%</i> | <i>100.0%</i> | <i>40</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$11,274</i> | <i>100.0%</i> | <i>100.0%</i> |

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

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Ft Myers

| Business Revenue & Loan Size | | Bank Lending & Demographic Data Comparison | | | | Bank & Aggregate Lending Comparison | | | | | | |
|--------------------------------------|-----------------------------|---|---------------|---------------------|---------------|-------------------------------------|-----------|---------------|---------------|-----------------|---------------|---------------|
| | | 2016 | | | | 2016 | | | | | | |
| | | Bank | | Total Businesses | Count | | | Dollar | | | | |
| | | Count | \$ (000s) | | Bank | Agg | Bank | Agg | | | | |
| # | % | \$ % | % | # | % | % | \$ (000s) | \$ % | \$ % | | | |
| BUSINESS REVENUE | \$1million or Less | 16 | 40.0% | \$6,195 | 54.9% | 94.0% | 16 | 40.0% | 44.1% | \$6,195 | 54.9% | 34.2% |
| | Over \$1 Million | 24 | 60.0% | \$5,079 | 45.1% | 5.3% | 24 | 60.0% | | | | |
| | <i>Total Rev. available</i> | <i>40</i> | <i>100.0%</i> | <i>\$11,274</i> | <i>100.0%</i> | <i>99.3%</i> | <i>40</i> | <i>100.0%</i> | | | | |
| | Rev. Not Known | 0 | 0.0% | \$0 | 0.0% | 0.7% | 0 | 0.0% | | | | |
| | <i>Total</i> | <i>40</i> | <i>100.0%</i> | <i>\$11,274</i> | <i>100.0%</i> | <i>100.0%</i> | <i>40</i> | <i>100.0%</i> | | | | |
| LOAN SIZE | \$100,000 or Less | 12 | 30.0% | \$722 | 6.4% | | 12 | 30.0% | 96.3% | \$722 | 6.4% | 52.2% |
| | \$100,001 - \$250,000 | 14 | 35.0% | \$2,339 | 20.7% | | 14 | 35.0% | 2.0% | \$2,339 | 20.7% | 13.3% |
| | \$250,001 - \$1 Million | 14 | 35.0% | \$8,213 | 72.8% | | 14 | 35.0% | 1.8% | \$8,213 | 72.8% | 34.5% |
| | <i>Total</i> | <i>40</i> | <i>100.0%</i> | <i>\$11,274</i> | <i>100.0%</i> | | <i>40</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$11,274</i> | <i>100.0%</i> | <i>100.0%</i> |
| LOAN SIZE Rev \$1 Mill or Less | \$100,000 or Less | 2 | 12.5% | \$130 | 2.1% | | | | | | | |
| | \$100,001 - \$250,000 | 6 | 37.5% | \$1,016 | 16.4% | | | | | | | |
| | \$250,001 - \$1 Million | 8 | 50.0% | \$5,049 | 81.5% | | | | | | | |
| | <i>Total</i> | <i>16</i> | <i>100.0%</i> | <i>\$6,195</i> | <i>100.0%</i> | | | | | | | |

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2016 FFIEC Census Data and 2016 D&B Information

Geographic Distribution of HMDA Loans

Assessment Area: Ft. Myers

| PRODUCT TYPE | Tract Income Levels | Bank Lending & Demographic Data Comparison | | | | |
|------------------|---------------------|--|----------|----------------------|--------------|---------------|
| | | 2017 | | | | |
| | | Bank | | Owner Occupied Units | | |
| | | Count | Dollar | | | |
| | | # | % | \$ (000s) | \$ % | % |
| HOME PURCHASE | Low | 0 | 0.0% | \$0 | 0.0% | 2.1% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.6% |
| | Middle | 1 | 100.0% | \$245 | 100.0% | 44.2% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 35.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | | <i>1</i> | <i>100.0%</i> | <i>\$245</i> | <i>100.0%</i> |
| REFINANCE | Low | 0 | 0.0% | \$0 | 0.0% | 2.1% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.6% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 44.2% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 35.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> |
| HOME IMPROVEMENT | Low | 0 | 0.0% | \$0 | 0.0% | 2.1% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.6% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 44.2% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 35.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> |
| MULTI FAMILY | Low | 0 | 0.0% | \$0 | 0.0% | 3.0% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.7% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 30.2% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 48.2% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> |
| HMDA TOTALS | Low | 0 | 0.0% | \$0 | 0.0% | 2.1% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.6% |
| | Middle | 1 | 100.0% | \$245 | 100.0% | 44.2% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 35.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | | <i>1</i> | <i>100.0%</i> | <i>\$245</i> | <i>100.0%</i> |

Originations & Purchases
2017 FFIEC Census Data and 2010 ACS Data

Borrower Distribution of HMDA Loans

Assessment Area: Ft. Myers

| PRODUCT TYPE | Borrower Income Levels | Bank Lending & Demographic Data Comparison | | | | |
|------------------|------------------------|--|---------------|--------------|---------------|---------------------------|
| | | 2017 | | | | |
| | | Count | | Dollar | | Families by Family Income |
| | | # | % | \$ (000s) | \$ % | % |
| HOME PURCHASE | Low | 0 | 0.0% | \$0 | 0.0% | 20.8% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.5% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 19.7% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 41.1% |
| | Unknown | 1 | 100.0% | \$245 | 100.0% | 0.0% |
| | <i>Total</i> | <i>1</i> | <i>100.0%</i> | <i>\$245</i> | <i>100.0%</i> | <i>100.0%</i> |
| REFINANCE | Low | 0 | 0.0% | \$0 | 0.0% | 20.8% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.5% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 19.7% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 41.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| HOME IMPROVEMENT | Low | 0 | 0.0% | \$0 | 0.0% | 20.8% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.5% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 19.7% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 41.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| MULTI FAMILY | Low | 0 | 0.0% | \$0 | 0.0% | 20.8% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.5% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 19.7% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 41.1% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| HMDA TOTALS | Low | 0 | 0.0% | \$0 | 0.0% | 20.8% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.5% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 19.7% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 41.1% |
| | Unknown | 1 | 100.0% | \$245 | 100.0% | 0.0% |
| | <i>Total</i> | <i>1</i> | <i>100.0%</i> | <i>\$245</i> | <i>100.0%</i> | <i>100.0%</i> |

Originations & Purchases
2017 FFIEC Census Data and 2010 ACS Data

APPENDIX D – LIMITED-SCOPE CHARTS (Continued)

Geographic Distribution of Small Business Loans

Assessment Area: Ft. Myers

| Tract Income Levels | Bank Lending & Demographic Data Comparison | | | | |
|---------------------------|--|---------------|---------------------|---------------|---------------|
| | 2017 | | | | |
| | Bank | | Small Businesses | | |
| | Count | | Dollar | | % |
| | # | % | \$ (000s) | \$ % | % |
| Low | 0 | 0.0% | \$0 | 0.0% | 2.6% |
| Moderate | 11 | 26.2% | \$3,400 | 24.5% | 20.9% |
| Middle | 20 | 47.6% | \$6,304 | 45.4% | 42.0% |
| Upper | 11 | 26.2% | \$4,182 | 30.1% | 34.4% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.1% |
| Tr Unknown | 0 | 0.0% | \$0 | 0.0% | |
| <i>Total</i> | <i>42</i> | <i>100.0%</i> | <i>\$13,886</i> | <i>100.0%</i> | <i>100.0%</i> |

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

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Ft. Myers

| Business Revenue & Loan Size | | Bank Lending & Demographic Data Comparison | | | | |
|--|-----------------------------|---|---------------|---------------------|---------------|---------------|
| | | 2017 | | | | |
| | | Bank | | Total Businesses | | |
| | | Count | | \$ (000s) | | % |
| | # | % | \$ | % | % | |
| BUSINESS REVENUE | \$1million or Less | 16 | 38.1% | \$4,496 | 32.4% | 94.0% |
| | Over \$1 Million | 25 | 59.5% | \$9,198 | 66.2% | 5.3% |
| | <i>Total Rev. available</i> | <i>41</i> | <i>97.6%</i> | <i>\$13,694</i> | <i>98.6%</i> | <i>99.3%</i> |
| | Rev. Not Known | 1 | 2.4% | \$192 | 1.4% | 0.7% |
| | <i>Total</i> | <i>42</i> | <i>100.0%</i> | <i>\$13,886</i> | <i>100.0%</i> | <i>100.0%</i> |
| LOAN SIZE | \$100,000 or Less | 8 | 19.0% | \$463 | 3.3% | |
| | \$100,001 - \$250,000 | 13 | 31.0% | \$2,315 | 16.7% | |
| | \$250,001 - \$1 Million | 21 | 50.0% | \$11,108 | 80.0% | |
| | Over \$1 Million | 0 | 0.0% | \$0 | 0.0% | |
| | <i>Total</i> | <i>42</i> | <i>100.0%</i> | <i>\$13,886</i> | <i>100.0%</i> | |
| LOAN SIZE & Rev \$1 Mill or Less | \$100,000 or Less | 5 | 31.3% | \$276 | 6.1% | |
| | \$100,001 - \$250,000 | 3 | 18.8% | \$613 | 13.6% | |
| | \$250,001 - \$1 Million | 8 | 50.0% | \$3,607 | 80.2% | |
| | Over \$1 Million | 0 | 0.0% | \$0 | 0.0% | |
| | <i>Total</i> | <i>16</i> | <i>100.0%</i> | <i>\$4,496</i> | <i>100.0%</i> | |

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

APPENDIX D – LIMITED-SCOPE CHARTS (Continued)

Combined Demographics Report

Assessment Area: Tampa 2017

| Income Categories | Tract Distribution | | Families by Tract Income | | Families < Poverty Level as % of Families by Tract | | Families by Family Income | |
|--|----------------------------------|---|--------------------------|-------------------------|--|-----------------------------|---------------------------|--------------|
| | # | % | # | % | # | % | # | % |
| Low-income | 28 | 16.5 | 18,212 | 12.4 | 7,331 | 40.3 | 40,653 | 27.6 |
| Moderate-income | 47 | 27.6 | 45,216 | 30.7 | 9,694 | 21.4 | 25,957 | 17.6 |
| Middle-income | 38 | 22.4 | 33,535 | 22.8 | 3,922 | 11.7 | 23,675 | 16.1 |
| Upper-income | 48 | 28.2 | 49,313 | 33.5 | 2,848 | 5.8 | 56,812 | 38.6 |
| Unknown-income | 9 | 5.3 | 821 | 0.6 | 202 | 24.6 | 0 | 0 |
| Total Assessment Area | 170 | 100.0 | 147,097 | 100.0 | 23,997 | 16.3 | 147,097 | 100.0 |
| | Housing Units by Tract | Housing Types by Tract | | | | | | |
| | | Owner-Occupied | | Rental | | Vacant | | |
| | | # | % | # | % | # | % | |
| Low-income | 41,277 | 8,810 | 6.9 | 21.3 | 25,638 | 62.1 | 6,829 | 16.5 |
| Moderate-income | 87,512 | 35,141 | 27.3 | 40.2 | 41,239 | 47.1 | 11,132 | 12.7 |
| Middle-income | 68,528 | 31,650 | 24.6 | 46.2 | 28,860 | 42.1 | 8,018 | 11.7 |
| Upper-income | 92,568 | 52,458 | 40.8 | 56.7 | 30,683 | 33.1 | 9,427 | 10.2 |
| Unknown-income | 2,253 | 437 | 0.3 | 19.4 | 1,529 | 67.9 | 287 | 12.7 |
| Total Assessment Area | 292,138 | 128,496 | 100.0 | 44.0 | 127,949 | 43.8 | 35,693 | 12.2 |
| | Total Businesses by Tract | Businesses by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | |
| Low-income | 4,531 | 10.3 | 3,896 | 9.7 | 608 | 17 | 27 | 7 |
| Moderate-income | 11,389 | 25.8 | 10,363 | 25.8 | 962 | 26.8 | 64 | 16.6 |
| Middle-income | 9,655 | 21.9 | 8,694 | 21.6 | 889 | 24.8 | 72 | 18.7 |
| Upper-income | 18,111 | 41 | 16,829 | 41.9 | 1,062 | 29.6 | 220 | 57 |
| Unknown-income | 463 | 1 | 396 | 1 | 64 | 1.8 | 3 | 0.8 |
| Total Assessment Area | 44,149 | 100.0 | 40,178 | 100.0 | 3,585 | 100.0 | 386 | 100.0 |
| Percentage of Total Businesses: | | | 91.0 | | 8.1 | | .9 | |
| | Total Farms by Tract | Farms by Tract & Revenue Size | | | | | | |
| | | Less Than or = \$1 Million | | Over \$1 Million | | Revenue Not Reported | | |
| | | # | % | # | % | # | % | |
| Low-income | 7 | 4.4 | 6 | 3.9 | 1 | 16.7 | 0 | 0 |
| Moderate-income | 25 | 15.6 | 24 | 15.6 | 1 | 16.7 | 0 | 0 |
| Middle-income | 34 | 21.3 | 34 | 22.1 | 0 | 0 | 0 | 0 |
| Upper-income | 94 | 58.8 | 90 | 58.4 | 4 | 66.7 | 0 | 0 |
| Unknown-income | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total Assessment Area | 160 | 100.0 | 154 | 100.0 | 6 | 100.0 | 0 | .0 |
| Percentage of Total Farms: | | | 96.3 | | 3.8 | | .0 | |

2017 FFIEC Census Data and 2016 D&B Information

Borrower Distribution of HMDA Loans

Assessment Area: Tampa

| PRODUCT TYPE | Borrower Income Levels | Bank Lending & Demographic Data | | | | | Bank & Aggregate Lending Comparison | | | | | | | | | | | |
|------------------|------------------------|---------------------------------|---------------|--------------|---------------|---------------------------|-------------------------------------|---------------|---------------|--------------|---------------|---------------|----------|---------------|---------------|-------------|---------------|---------------|
| | | 2015, 2016 | | | | | 2015 | | | | | | 2016 | | | | | |
| | | Count | | Bank | | Families by Family Income | Count | | | Dollar | | | Count | | | Dollar | | |
| | | # | % | \$(000s) | % | | Bank | Agg | % | \$(000s) | % | % | Bank | Agg | % | \$(000s) | % | % |
| HOME PURCHASE | Low | 0 | 0.0% | \$0 | 0.0% | 26.0% | 0 | 0.0% | 5.4% | \$0 | 0.0% | 2.1% | 0 | 0.0% | 4.1% | \$0 | 0.0% | 1.6% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.8% | 0 | 0.0% | 15.4% | \$0 | 0.0% | 8.0% | 0 | 0.0% | 14.9% | \$0 | 0.0% | 7.7% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 17.4% | 0 | 0.0% | 16.3% | \$0 | 0.0% | 11.5% | 0 | 0.0% | 16.8% | \$0 | 0.0% | 12.0% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 37.8% | 0 | 0.0% | 46.4% | \$0 | 0.0% | 64.2% | 0 | 0.0% | 46.3% | \$0 | 0.0% | 64.6% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 16.5% | \$0 | 0.0% | 14.1% | 0 | 0.0% | 17.9% | \$0 | 0.0% | 14.1% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| REFINANCE | Low | 0 | 0.0% | \$0 | 0.0% | 26.0% | 0 | 0.0% | 4.9% | \$0 | 0.0% | 2.0% | 0 | 0.0% | 4.4% | \$0 | 0.0% | 1.8% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.8% | 0 | 0.0% | 9.1% | \$0 | 0.0% | 4.7% | 0 | 0.0% | 9.5% | \$0 | 0.0% | 4.9% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 17.4% | 0 | 0.0% | 13.9% | \$0 | 0.0% | 9.5% | 0 | 0.0% | 14.6% | \$0 | 0.0% | 9.6% |
| | Upper | 1 | 50.0% | \$675 | 89.1% | 37.8% | 1 | 100.0% | 48.0% | \$675 | 100.0% | 60.3% | 0 | 0.0% | 50.1% | \$0 | 0.0% | 63.8% |
| | Unknown | 1 | 50.0% | \$83 | 10.9% | 0.0% | 0 | 0.0% | 24.1% | \$0 | 0.0% | 23.6% | 1 | 100.0% | 21.4% | \$83 | 100.0% | 19.9% |
| | <i>Total</i> | <i>2</i> | <i>100.0%</i> | <i>\$758</i> | <i>100.0%</i> | <i>100.0%</i> | <i>1</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$675</i> | <i>100.0%</i> | <i>100.0%</i> | <i>1</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$83</i> | <i>100.0%</i> | <i>100.0%</i> |
| HOME IMPROVEMENT | Low | 0 | 0.0% | \$0 | 0.0% | 26.0% | 0 | 0.0% | 8.6% | \$0 | 0.0% | 4.2% | 0 | 0.0% | 7.7% | \$0 | 0.0% | 3.2% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.8% | 0 | 0.0% | 18.1% | \$0 | 0.0% | 7.4% | 0 | 0.0% | 15.8% | \$0 | 0.0% | 8.1% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 17.4% | 0 | 0.0% | 15.4% | \$0 | 0.0% | 12.4% | 0 | 0.0% | 18.2% | \$0 | 0.0% | 11.0% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 37.8% | 0 | 0.0% | 52.9% | \$0 | 0.0% | 68.2% | 0 | 0.0% | 53.8% | \$0 | 0.0% | 71.2% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 5.1% | \$0 | 0.0% | 7.7% | 0 | 0.0% | 4.5% | \$0 | 0.0% | 6.4% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| MULTI FAMILY | Low | 0 | 0.0% | \$0 | 0.0% | 26.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.8% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 17.4% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 37.8% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 100.0% | \$0 | 0.0% | 100.0% | 0 | 0.0% | 100.0% | \$0 | 0.0% | 100.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| HMDA TOTALS | Low | 0 | 0.0% | \$0 | 0.0% | 26.0% | 0 | 0.0% | 5.4% | \$0 | 0.0% | 1.8% | 0 | 0.0% | 4.3% | \$0 | 0.0% | 1.5% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 18.8% | 0 | 0.0% | 13.4% | \$0 | 0.0% | 5.9% | 0 | 0.0% | 13.1% | \$0 | 0.0% | 5.9% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 17.4% | 0 | 0.0% | 15.4% | \$0 | 0.0% | 9.3% | 0 | 0.0% | 16.0% | \$0 | 0.0% | 9.7% |
| | Upper | 1 | 50.0% | \$675 | 89.1% | 37.8% | 1 | 100.0% | 47.0% | \$675 | 100.0% | 53.8% | 0 | 0.0% | 47.7% | \$0 | 0.0% | 55.9% |
| | Unknown | 1 | 50.0% | \$83 | 10.9% | 0.0% | 0 | 0.0% | 18.8% | \$0 | 0.0% | 29.2% | 1 | 100.0% | 18.8% | \$83 | 100.0% | 27.0% |
| | <i>Total</i> | <i>2</i> | <i>100.0%</i> | <i>\$758</i> | <i>100.0%</i> | <i>100.0%</i> | <i>1</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$675</i> | <i>100.0%</i> | <i>100.0%</i> | <i>1</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$83</i> | <i>100.0%</i> | <i>100.0%</i> |

Originations & Purchases

2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of HMDA Loans

Assessment Area: Tampa

| PRODUCT TYPE | Tract Income Levels | Bank Lending & Demographic Data Comparison | | | | | Bank & Aggregate Lending Comparison | | | | | | | | | | | |
|------------------|---------------------|--|---------------|--------------|---------------|----------------------|-------------------------------------|---------------|---------------|--------------|---------------|---------------|----------|---------------|---------------|-------------|---------------|---------------|
| | | 2015, 2016 | | | | | 2015 | | | | | | 2016 | | | | | |
| | | Bank | | | | Owner Occupied Units | Count | | Dollar | | | | Count | | Dollar | | | |
| | | Count | Dollar | | | | Bank | Agg | Bank | Agg | | | Bank | Agg | Dollar | | | |
| # | % | \$ (000s) | % | % | # | % | % | \$ (000s) | % | % | # | % | % | \$ (000s) | % | % | | |
| HOME PURCHASE | Low | 0 | 0.0% | \$0 | 0.0% | 6.2% | 0 | 0.0% | 4.0% | \$0 | 0.0% | 2.4% | 0 | 0.0% | 4.3% | \$0 | 0.0% | 2.3% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 27.7% | 0 | 0.0% | 20.6% | \$0 | 0.0% | 11.9% | 0 | 0.0% | 21.9% | \$0 | 0.0% | 12.8% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 31.9% | 0 | 0.0% | 32.8% | \$0 | 0.0% | 26.8% | 0 | 0.0% | 34.3% | \$0 | 0.0% | 28.9% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 34.2% | 0 | 0.0% | 42.4% | \$0 | 0.0% | 58.9% | 0 | 0.0% | 39.5% | \$0 | 0.0% | 55.9% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.1% | \$0 | 0.0% | 0.1% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.1% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| REFINANCE | Low | 0 | 0.0% | \$0 | 0.0% | 6.2% | 0 | 0.0% | 4.0% | \$0 | 0.0% | 2.0% | 0 | 0.0% | 3.1% | \$0 | 0.0% | 1.5% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 27.7% | 0 | 0.0% | 17.7% | \$0 | 0.0% | 9.9% | 0 | 0.0% | 17.5% | \$0 | 0.0% | 9.7% |
| | Middle | 1 | 50.0% | \$83 | 10.9% | 31.9% | 0 | 0.0% | 30.3% | \$0 | 0.0% | 23.2% | 1 | 100.0% | 32.1% | \$83 | 100.0% | 25.9% |
| | Upper | 1 | 50.0% | \$675 | 89.1% | 34.2% | 1 | 100.0% | 48.0% | \$675 | 100.0% | 64.9% | 0 | 0.0% | 47.2% | \$0 | 0.0% | 62.9% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.1% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>2</i> | <i>100.0%</i> | <i>\$758</i> | <i>100.0%</i> | <i>100.0%</i> | <i>1</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$675</i> | <i>100.0%</i> | <i>100.0%</i> | <i>1</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$83</i> | <i>100.0%</i> | <i>100.0%</i> |
| HOME IMPROVEMENT | Low | 0 | 0.0% | \$0 | 0.0% | 6.2% | 0 | 0.0% | 6.2% | \$0 | 0.0% | 3.3% | 0 | 0.0% | 6.1% | \$0 | 0.0% | 2.1% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 27.7% | 0 | 0.0% | 22.3% | \$0 | 0.0% | 10.2% | 0 | 0.0% | 24.5% | \$0 | 0.0% | 12.9% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 31.9% | 0 | 0.0% | 30.6% | \$0 | 0.0% | 24.6% | 0 | 0.0% | 28.5% | \$0 | 0.0% | 20.2% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 34.2% | 0 | 0.0% | 40.9% | \$0 | 0.0% | 61.8% | 0 | 0.0% | 40.9% | \$0 | 0.0% | 64.8% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| MULTIFAMILY | Low | 0 | 0.0% | \$0 | 0.0% | 9.5% | 0 | 0.0% | 13.9% | \$0 | 0.0% | 5.4% | 0 | 0.0% | 18.3% | \$0 | 0.0% | 5.4% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 38.4% | 0 | 0.0% | 29.2% | \$0 | 0.0% | 20.0% | 0 | 0.0% | 35.2% | \$0 | 0.0% | 33.4% |
| | Middle | 0 | 0.0% | \$0 | 0.0% | 26.1% | 0 | 0.0% | 33.3% | \$0 | 0.0% | 28.3% | 0 | 0.0% | 22.5% | \$0 | 0.0% | 29.5% |
| | Upper | 0 | 0.0% | \$0 | 0.0% | 25.9% | 0 | 0.0% | 23.6% | \$0 | 0.0% | 46.3% | 0 | 0.0% | 23.9% | \$0 | 0.0% | 31.6% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>0</i> | <i>0.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>0</i> | <i>0.0%</i> | <i>100.0%</i> | <i>\$0</i> | <i>0.0%</i> | <i>100.0%</i> |
| HMDA TOTALS | Low | 0 | 0.0% | \$0 | 0.0% | 6.2% | 0 | 0.0% | 4.2% | \$0 | 0.0% | 2.7% | 0 | 0.0% | 4.0% | \$0 | 0.0% | 2.5% |
| | Moderate | 0 | 0.0% | \$0 | 0.0% | 27.7% | 0 | 0.0% | 19.8% | \$0 | 0.0% | 12.5% | 0 | 0.0% | 20.6% | \$0 | 0.0% | 14.7% |
| | Middle | 1 | 50.0% | \$83 | 10.9% | 31.9% | 0 | 0.0% | 31.9% | \$0 | 0.0% | 26.0% | 1 | 100.0% | 33.3% | \$83 | 100.0% | 28.0% |
| | Upper | 1 | 50.0% | \$675 | 89.1% | 34.2% | 1 | 100.0% | 44.0% | \$675 | 100.0% | 58.6% | 0 | 0.0% | 42.0% | \$0 | 0.0% | 54.8% |
| | Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.1% | \$0 | 0.0% | 0.1% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| | <i>Total</i> | <i>2</i> | <i>100.0%</i> | <i>\$758</i> | <i>100.0%</i> | <i>100.0%</i> | <i>1</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$675</i> | <i>100.0%</i> | <i>100.0%</i> | <i>1</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$83</i> | <i>100.0%</i> | <i>100.0%</i> |

Originations & Purchases
2016 FFIEC Census Data and 2010 ACS Data

Geographic Distribution of Small Business Loans

Assessment Area: Tampa

| Tract Income Levels | Bank Lending & Demographic Data Comparison | | | | | Bank & Aggregate Lending Comparison | | | | | | | | | | | |
|---------------------|--|---------------|----------------|---------------|--------------------|-------------------------------------|---------------|---------------|--------------|---------------|---------------|----------|---------------|---------------|----------------|---------------|---------------|
| | 2015, 2016 | | | | | 2015 | | | | | 2016 | | | | | | |
| | Count | | Bank Dollar | | Small Businesses % | Count | | Dollar | | | Count | | Dollar | | | | |
| | # | % | \$ (000s) | \$ % | | Bank # | Agg % | Bank \$ 000s | \$ % | Agg \$ % | Bank # | Agg % | Bank \$ 000s | \$ % | Agg \$ % | | |
| Low | 1 | 25.0% | \$882 | 53.7% | 7.1% | 0 | 0.0% | 8.3% | \$0 | 0.0% | 9.5% | 1 | 33.3% | 9.1% | \$882 | 71.6% | 11.1% |
| Moderate | 2 | 50.0% | \$459 | 28.0% | 26.6% | 1 | 100.0% | 25.0% | \$409 | 100.0% | 29.7% | 1 | 33.3% | 26.4% | \$50 | 4.1% | 28.5% |
| Middle | 0 | 0.0% | \$0 | 0.0% | 27.9% | 0 | 0.0% | 27.7% | \$0 | 0.0% | 25.2% | 0 | 0.0% | 27.6% | \$0 | 0.0% | 28.7% |
| Upper | 1 | 25.0% | \$300 | 18.3% | 38.1% | 0 | 0.0% | 38.7% | \$0 | 0.0% | 35.5% | 1 | 33.3% | 36.6% | \$300 | 24.4% | 31.6% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.4% | 0 | 0.0% | 0.3% | \$0 | 0.0% | 0.2% | 0 | 0.0% | 0.2% | \$0 | 0.0% | 0.2% |
| Tr Unknown | 0 | 0.0% | \$0 | 0.0% | | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% |
| <i>Total</i> | <i>4</i> | <i>100.0%</i> | <i>\$1,641</i> | <i>100.0%</i> | <i>100.0%</i> | <i>1</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$409</i> | <i>100.0%</i> | <i>100.0%</i> | <i>3</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$1,232</i> | <i>100.0%</i> | <i>100.0%</i> |

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

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Tampa

| Business Revenue & Loan Size | | Bank Lending & Demographic Data Comparison | | | | | Bank & Aggregate Lending Comparison | | | | | | | | | | | |
|-----------------------------------|-----------------------------|--|---------------|----------------|---------------|--------------------|-------------------------------------|---------------|----------------|--------------|---------------|---------------|---------------|----------------|---------------|----------------|---------------|---------------|
| | | 2015, 2016 | | | | | 2015 | | | | | 2016 | | | | | | |
| | | Count | | Bank Dollar | | Total Businesses % | Count | | Dollar | | | Count | | Dollar | | | | |
| | | # | % | \$ (000s) | \$ % | | Bank # | Agg % | Bank \$ (000s) | \$ % | Agg \$ % | Bank # | Agg % | Bank \$ (000s) | \$ % | Agg \$ % | | |
| BUSINESS REVENUE | \$1million or Less | 2 | 50.0% | \$1,182 | 72.0% | 91.0% | 0 | 0.0% | 52.5% | \$0 | 0.0% | 35.3% | 2 | 66.7% | 45.9% | \$1,182 | 95.9% | 31.8% |
| | Over \$1 Million | 2 | 50.0% | \$459 | 28.0% | 8.1% | 1 | 100.0% | | | | 1 | 33.3% | | | | | |
| | <i>Total Rev. available</i> | <i>4</i> | <i>100.0%</i> | <i>\$1,641</i> | <i>100.0%</i> | <i>99.1%</i> | <i>1</i> | <i>100.0%</i> | | | | <i>3</i> | <i>100.0%</i> | | | | | |
| | Rev. Not Known | 0 | 0.0% | \$0 | 0.0% | 0.9% | 0 | 0.0% | | | | 0 | 0.0% | | | | | |
| | <i>Total</i> | <i>4</i> | <i>100.0%</i> | <i>\$1,641</i> | <i>100.0%</i> | <i>100.0%</i> | <i>1</i> | <i>100.0%</i> | | | | <i>3</i> | <i>100.0%</i> | | | | | |
| LOAN SIZE | \$100,000 or Less | 1 | 25.0% | \$50 | 3.0% | | 0 | 0.0% | 92.9% | \$0 | 0.0% | 31.3% | 1 | 33.3% | 94.1% | \$50 | 4.1% | 38.0% |
| | \$100,001 - \$250,000 | 0 | 0.0% | \$0 | 0.0% | | 0 | 0.0% | 3.3% | \$0 | 0.0% | 15.3% | 0 | 0.0% | 3.1% | \$0 | 0.0% | 16.4% |
| | \$250,001 - \$1 Million | 3 | 75.0% | \$1,591 | 97.0% | | 1 | 100.0% | 3.8% | \$409 | 100.0% | 53.5% | 2 | 66.7% | 2.8% | \$1,182 | 95.9% | 45.6% |
| | <i>Total</i> | <i>4</i> | <i>100.0%</i> | <i>\$1,641</i> | <i>100.0%</i> | | <i>1</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$409</i> | <i>100.0%</i> | <i>100.0%</i> | <i>3</i> | <i>100.0%</i> | <i>100.0%</i> | <i>\$1,232</i> | <i>100.0%</i> | <i>100.0%</i> |
| LOAN SIZE Rev \$1 Mill or Less | \$100,000 or Less | 0 | 0.0% | \$0 | 0.0% | | | | | | | | | | | | | |
| | \$100,001 - \$250,000 | 0 | 0.0% | \$0 | 0.0% | | | | | | | | | | | | | |
| | \$250,001 - \$1 Million | 2 | 100.0% | \$1,182 | 100.0% | | | | | | | | | | | | | |
| | <i>Total</i> | <i>2</i> | <i>100.0%</i> | <i>\$1,182</i> | <i>100.0%</i> | | | | | | | | | | | | | |

Originations & Purchases
 Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
 2016 FFIEC Census Data and 2016 D&B Information

Geographic Distribution of Small Business Loans

Assessment Area: Tampa

| Tract Income Levels | Bank Lending & Demographic Data Comparison | | | | |
|---------------------------|--|---------------|----------------|---------------|---------------------|
| | 2017 | | | | |
| | Count | | Bank Dollar | | Small Businesses |
| | # | % | \$ (000s) | \$ % | % |
| Low | 2 | 25.0% | \$300 | 11.5% | 9.7% |
| Moderate | 2 | 25.0% | \$644 | 24.7% | 25.8% |
| Middle | 3 | 37.5% | \$1,113 | 42.7% | 21.6% |
| Upper | 1 | 12.5% | \$550 | 21.1% | 41.9% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 1.0% |
| Tr Unknown | 0 | 0.0% | \$0 | 0.0% | |
| <i>Total</i> | <i>8</i> | <i>100.0%</i> | <i>\$2,607</i> | <i>100.0%</i> | <i>100.0%</i> |

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

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Tampa

| Business Revenue & Loan Size | | Bank Lending & Demographic Data Comparison | | | | |
|--|-----------------------------|---|---------------|-------------------|---------------|---------------------|
| | | 2017 | | | | |
| | | Count | | Bank \$ (000s) | | Total Businesses |
| | | # | % | \$ | % | % |
| BUSINESS REVENUE | \$1million or Less | 2 | 25.0% | \$457 | 17.5% | 91.0% |
| | Over \$1 Million | 6 | 75.0% | \$2,150 | 82.5% | 8.1% |
| | <i>Total Rev. available</i> | <i>8</i> | <i>100.0%</i> | <i>\$2,607</i> | <i>100.0%</i> | <i>99.1%</i> |
| | Rev. Not Known | 0 | 0.0% | \$0 | 0.0% | 0.9% |
| | <i>Total</i> | <i>8</i> | <i>100.0%</i> | <i>\$2,607</i> | <i>100.0%</i> | <i>100.0%</i> |
| LOAN SIZE | \$100,000 or Less | 1 | 12.5% | \$100 | 3.8% | |
| | \$100,001 - \$250,000 | 2 | 25.0% | \$313 | 12.0% | |
| | \$250,001 - \$1 Million | 5 | 62.5% | \$2,194 | 84.2% | |
| | Over \$1 Million | 0 | 0.0% | \$0 | 0.0% | |
| | <i>Total</i> | <i>8</i> | <i>100.0%</i> | <i>\$2,607</i> | <i>100.0%</i> | |
| LOAN SIZE & Rev \$1 Mill or Less | \$100,000 or Less | 0 | 0.0% | \$0 | 0.0% | |
| | \$100,001 - \$250,000 | 1 | 50.0% | \$113 | 24.7% | |
| | \$250,001 - \$1 Million | 1 | 50.0% | \$344 | 75.3% | |
| | Over \$1 Million | 0 | 0.0% | \$0 | 0.0% | |
| | <i>Total</i> | <i>2</i> | <i>100.0%</i> | <i>\$457</i> | <i>100.0%</i> | |

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