

# **PUBLIC DISCLOSURE**

January 16, 2024

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Fieldpoint Private Bank & Trust  
RSSD No. 3664588

One Greenwich Plaza  
Greenwich, Connecticut 06830

Federal Reserve Bank of New York  
33 Liberty Street  
New York, NY 10045

**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 this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## INSTITUTION'S CRA RATING

**INSTITUTION'S CRA RATING: This institution is rated Needs to Improve.**

**The Lending Test is rated: Needs to Improve.**

**The Community Development Test is rated: Satisfactory.**

### SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS

The major factors supporting the “Needs to Improve” performance rating for Fieldpoint Private Bank & Trust (Fieldpoint or the bank) with regard to the Community Reinvestment Act (CRA) include the following:

- The loan-to-deposit ratio was more than reasonable given the bank’s size, financial condition, and assessment area credit needs.
- A majority of loans and other lending related activities were outside the assessment areas.
- The distribution of borrowers reflected, given the demographics of the assessment areas, poor penetration among individuals of different income levels (including low- and moderate-income) and business of different sizes.
- The geographic distribution of loans reflected poor dispersion throughout the assessment areas.
- There were no CRA-related complaints filed against the bank since the previous CRA evaluation.
- The bank’s community development performance demonstrated adequate responsiveness to community development needs of its assessment areas, through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s assessment area.

## DESCRIPTION OF INSTITUTION

Fieldpoint is a state member bank headquartered in Greenwich, Connecticut, and is wholly owned by Fieldpoint Private Holdings. Fieldpoint is primarily engaged in wealth management and investment advisory services for high-net-worth clients with products and services designed primarily for high-net-worth individuals.

The bank offers consumer products and services including personal savings and time deposits, as well as residential consumer loans, multifamily loans, commercial and industrial loans, real estate, and private equity financing loans.

Fieldpoint operates four branches with in-person teller services located in each of the following states: Connecticut (CT), New York (NY), Atlanta (GA), and Florida (FL). Since the prior evaluation, Fieldpoint opened three branches – one in Atlanta, GA, one in Winter Park, FL and one in Coral Gables, FL. However, the bank decided to close the Coral Gables branch eight months after establishment. The bank does not operate any automatic teller machines (ATMs) and branch hours are the same for each location.

Based on the September 30, 2023, Federal Financial Institutions Examination Council (FFIEC) Consolidated Report of Condition and Income (Call Report), the bank had total assets of \$1.7 billion, total loans of \$1.0 billion, and total deposits of \$1.9 billion. Loans represented the bank’s primary asset, with 1-4 residential real estate, nonfarm nonresidential, and commercial & industrial loans representing 36.3%, 34.1%, and 12.9%, of the loan portfolio, respectively. Fieldpoint’s loan portfolio by dollar volume is summarized in the following table:

<b>Loan Portfolio September 30, 2023</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>Percent of Total Loans</b>
1-4 Residential Real Estate Secured	\$372,661	36.3%
Construction	\$32,899	3.2%
Multifamily Dwelling	\$78,220	7.6%
HELOCs	\$28,702	2.8%
Consumer	\$31,781	3.1%
Agriculture	\$0	0.0%
Commercial & Industrial	\$132,818	12.9%
Nonfarm Nonresidential Secured	\$349,838	34.1%
Other	\$0	0.0%
<b>Total</b>	<b>\$1,026,919</b>	<b>100.0%</b>
<i>Source: Call Report September 30, 2023</i>		

Based on the September 30, 2023, Uniform Bank Performance Report (UBPR), Fieldpoint’s deposit portfolio by dollar volume was comprised primarily of brokered deposit accounts, time deposit accounts, and demand deposit accounts as summarized in the following table.

<b>Deposit Portfolio September 30, 2023</b>		
<b>Deposit Type</b>	<b>\$(000)</b>	<b>Percent of Total Deposits</b>
Demand Deposits	\$459,560	23.8%
All NOW and ATS Accounts	\$12,709	0.7%
Money Market Deposit Accounts	\$140,580	7.3%
Other Savings Deposits	\$1,399	0.1%
Time Deposits at or below Insurance Limit	\$506,502	26.3%
Time Deposits Above Insurance Limit	\$33,271	1.7%
Brokered Deposits	\$775,436	40.2%
<b>Total</b>	<b>\$1,929,457</b>	<b>100.0%</b>
<i>Source: UBPR as of September 30, 2023</i>		
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The Federal Reserve Bank of New York (FRBNY) assigned a rating of “Satisfactory” at the prior CRA Performance Evaluation dated February 12, 2018, using FFIEC Interagency Intermediate Small Institution Examination Procedures.

## DESCRIPTION OF ASSESSMENT AREA

At the prior evaluation, Fieldpoint maintained two assessment areas, which included Metropolitan Division (MD) 35614 (New York-Jersey City-White Plains, NY-NJ) and Metropolitan Statistical Area (MSA) 14860 (Bridgeport-Stamford-Norwalk, CT). During the current evaluation period, management expanded the CRA assessment areas with its branch openings in Atlanta, Winter Park, and Coral Gables. As noted previously, management closed the Coral Gables branch on June 30, 2023, after eight months of operation. Therefore, examiners did not consider the bank's performance or activities in the MD 33124 (Miami-Miami Beach-Kendall, FL) assessment area for this review due to the limited timeframe of operations.

The CRA performance evaluation included the following four bank delineated assessment areas:

- MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area, consisting of NY County in its entirety. The assessment area has not changed since the prior evaluation.
- MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area, consisting of Fairfield County in its entirety. At the prior evaluation, this assessment area included a portion of Fairfield County. In 2021, the bank expanded the assessment area and delineated the entire Fairfield County as part of the assessment area.
- MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA) assessment area, consisting of Fulton County in its entirety. The bank delineated the entire Fulton County as part of its assessment area, following the opening of the Atlanta, GA branch in August 2021.
- MSA 36740 (Orlando-Kissimmee-Sanford, FL) assessment area, consisting of Orange County in its entirety. The bank delineated the entire Orange County as part of its assessment area, following the opening of the Winter Park, FL branch in November 2022.

Fieldpoint's assessment areas were in compliance with the requirements of Section 228.41 of Regulation BB. Refer to Appendix A for an illustration of the bank's assessment areas.

## **SCOPE OF EVALUATION**

### **Procedures**

Fieldpoint's CRA performance was evaluated using the FFIEC Interagency Intermediate Small Institution Examination Procedures. These procedures include two tests: the Lending Test and the Community Development Test. Institutions must achieve at least a "Satisfactory" rating under each test to obtain an overall "Satisfactory" rating. The evaluation considered the CRA performance context, including the bank's asset size, financial condition, market competition, assessment area demographics and credit and community development needs. Examiners used full-scope examination procedures to evaluate the bank's performance for all included assessment areas. Most of the bank's deposit and lending activities occurred in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) and the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment areas and examiners assigned greater weight to these assessment areas when deriving overall conclusions.

### **Evaluation Period**

Examiners reviewed the bank's home mortgage loans and small business loans from January 1, 2017, to December 31, 2022. The Community Development Test included community development loans, qualified investments and grants, and community development services from April 1, 2017, through December 31, 2023.

### **Products**

During this evaluation, loans reportable under the Home Mortgage Disclosure Act (HMDA) as well as small business loans were analyzed, as these loan types represented the major product lines based on a review of bank records, business strategy, and loan portfolio composition. When evaluating the bank's performance under the Lending Test, examiners placed more weight on home mortgage loans when compared to small business loans based on the number of loans originated. Construction, consumer, and small farm loans were excluded from the evaluation as they did not represent a major product line.

Fieldpoint was a HMDA reporter for the majority of the evaluation period and examiners analyzed home mortgage data accordingly. Since Fieldpoint was not required to collect and report home loan data pursuant to the HMDA for 2020 and 2021, examiners utilized data that the bank voluntarily collected and provided. Home mortgage loans included home purchase, home refinance, home improvement, and multifamily housing loans. For the Lending Test, examiners combined and analyzed home purchase, home improvement, home refinance and multifamily loans, as individually, the loan volumes were insufficient to provide a meaningful analysis.

Examiners analyzed small business loan data from 2017 to 2022. Since, Fieldpoint was not required to collect and report small business loan data pursuant to the CRA, examiners utilized and verified the integrity of data that the bank voluntarily collected and provided.

Examiners also reviewed community development loans, qualified investments, grants and donations, and community development services. Peer comparisons were conducted using annualized metrics to gauge the relative performance of the bank. Local peer banks were selected based on asset size, deposits, branching structure, and presence within Fieldpoint's assessment area. As referenced in the CRA Q&A § .12(h)—6, given that Fieldpoint was responsive in meeting the community development needs and opportunities of its assessment area, particularly MD 35614 (New York-Jersey City-White Plains, NY-NJ) and MSA 14860



(Bridgeport-Stamford-Norwalk, CT) assessment areas, examiners considered community development activities that were conducted in the broader statewide or regional area (BSRA) that included the assessment area.

In accordance with CA Letter 21-5 CRA Consideration for Activities in Response to the Coronavirus, and its attachments, Small Business Administration (SBA) Paycheck Protection Program (PPP) loans and qualified community development activities supporting community needs related to the COVID-19 pandemic located outside of the assessment area or the broader statewide or regional area were also given consideration. Since the prior evaluation, Fieldpoint originated 88 PPP loans totaling approximately \$19.7 million. These loans provided a direct benefit to small businesses adversely affected by the COVID-19 pandemic and were considered particularly responsive to acute credit needs during that time. The substantial majority of PPP loans were made in amounts under \$1 million.

### **Lending Analysis**

The analyses of borrower and geographic distribution were based on loans made in Fieldpoint's assessment area. To evaluate the geographic distribution, the proportion of home mortgage loan originations in low- and moderate-income (LMI) geographies was compared with the proportion of owner-occupied housing units in LMI geographies. For small business loans, the analysis compared the proportion of loan originations in LMI geographies with the proportion of small businesses located in LMI geographies as reported, based on Dun and Bradstreet (D&B) data. The geographic distribution performance in LMI geographies were analyzed separately.

To analyze the borrower characteristics of home mortgage loans, originations to LMI borrowers was compared with the proportion of LMI families in the assessment area. Median family income (MFI) estimates from the FFIEC were used to categorize borrower income. For small business lending, the analysis compared the proportion of loans to businesses with gross annual revenues (GAR) of \$1 million or less, based on D&B data to the proportion of all such businesses located in the assessment area. The size of the small business loans was also used as a proxy to identify lending to businesses with GAR of \$1 million or less.

For the years where Fieldpoint was required to report HMDA data, Fieldpoint's HMDA lending performance was also compared to the respective year's performance of the aggregate of all lenders in the assessment area subject to HMDA reporting. The bank's small business data was not compared to aggregate as Fieldpoint is not required to report small business loans. Peer data was used for the loan-to-deposit analysis. Local peer banks were selected based on the volume of deposits and number of branches similarly sized to Fieldpoint located within the assessment area. Fieldpoint's performance in making community development loans and qualified investments was also compared with peer banks in the bank's assessment area.

### **Community Contacts**

Examiners interviewed community representatives from five organizations to gain insight on local economic and demographic conditions and the financial and credit needs of the communities served by the organization. The community contacts provided information on affordable housing, community services, and economic development needs within the bank's assessment areas. The contacts stressed the need for more affordable housing, funding for new and struggling small businesses, flexible loan products with less fees, financial education, more products and services to help build credit, and identify ways to combat appraisal discrimination.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

### **LENDING TEST**

Fieldpoint's loan-to-deposit (LTD) ratio was more than reasonable given the bank's size, financial condition, and the assessment areas' credit needs. A majority of loans and other lending-related activities were originated outside the assessment areas. The borrower distribution reflected poor penetration among individuals of different income (including LMI) levels and businesses of different sizes. The geographic distribution of loans reflected poor dispersion throughout the assessment areas. Fieldpoint received no CRA-related complaints since the previous evaluation, therefore this criterion did not affect the Lending Test rating. The bank's overall lending performance was consistent with the conclusions for each assessment area. Refer to the separate assessment area sections for detailed discussions regarding the bank's performance under the Lending Test.

#### **Loan-to-Deposit Ratio**

Fieldpoint's LTD ratio was more than reasonable given the bank's size, financial condition, and the opportunities and the credit needs of its assessment area. Fieldpoint's average LTD ratio for the 24-quarters from January 1, 2017, to December 31, 2022, was 91.1%, which was comparable to the previous evaluation's 12-quarter average of 87.6% and indicated the bank's consistent willingness to lend. The bank's average LTD ratio over the evaluation period was higher than three similarly situated banks in the assessment areas.

#### **Assessment Area Concentration**

Fieldpoint made a majority of its loans outside the assessment area. During the evaluation period, lending inside the assessment area was 40.8% by number and 43.6% by dollar volume. Compared to the prior evaluation, this performance represented a decrease in number and dollar volume, which was 51.7% by number and 50.8% by dollar volume. The table below illustrates the bank's lending inside and outside of the assessment areas.

<b>Lending Inside and Outside the Assessment Areas January 1, 2017 to December 31, 2022</b>								
<b>Loan Types</b>	<b>Inside</b>				<b>Outside</b>			
	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Home Improvement	1	100.0%	\$1,370	100.0%	0	0.0%	\$0	0.0%
Home Purchase - Conventional	47	43.1%	\$109,412	51.3%	62	56.9%	\$104,016	48.7%
Loan Purpose Not Applicable	8	44.4%	\$19,186	53.2%	10	55.6%	\$16,907	46.8%
Multi-Family Housing	3	42.9%	\$4,505	25.0%	4	57.1%	\$13,525	75.0%
Refinancing	49	38.6%	\$94,989	39.8%	78	61.4%	\$143,423	60.2%
<b>Total HMDA</b>	<b>108</b>	<b>41.2%</b>	<b>\$229,462</b>	<b>45.2%</b>	<b>154</b>	<b>58.8%</b>	<b>\$277,871</b>	<b>54.8%</b>
Small Business	63	40.1%	\$17,311	29.8%	94	59.9%	\$40,856	70.2%
<b>Total Small Business</b>	<b>63</b>	<b>40.1%</b>	<b>\$17,311</b>	<b>29.8%</b>	<b>94</b>	<b>59.9%</b>	<b>\$40,856</b>	<b>70.2%</b>
<b>Total Loans</b>	<b>171</b>	<b>40.8%</b>	<b>\$246,773</b>	<b>43.6%</b>	<b>248</b>	<b>59.2%</b>	<b>\$318,727</b>	<b>56.4%</b>

*Source: Bank records*

### **Borrower Distribution of Loans**

The distribution of borrowers reflected, given the demographics of the assessment area(s), poor penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.

### **Geographic Distribution of Loans**

The geographic distribution of loans reflected poor dispersion throughout the assessment areas.

### **Response to Complaints**

Neither the bank nor the FRBNY received any CRA-related complaints since the previous evaluation.

## **COMMUNITY DEVELOPMENT TEST**

Fieldpoint demonstrated an overall adequate responsiveness to community development needs through community development loans, qualified investments, and community development services. This was considered appropriate considering the bank's capacity and the need and availability of community development activities in the bank's assessment areas. As previously mentioned, the substantial majority of activities benefited MD 35614 (New York-Jersey City-White Plains, NY-NJ) and MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment areas and examiners assigned greater weight to these assessment areas when deriving the overall conclusion of community development test. The Community Development Test also considered the performance of local competitors and their responsiveness to community development needs.

### Community Development Loans

Since the prior evaluation, Fieldpoint originated a total of 8 community development loans totaling approximately \$16.5 million. The annualized performance over 72 months represented 1.3 by number and \$2.8 million by dollar amount. At the prior evaluation, Fieldpoint originated 5 community development loans totaling \$6.1 million. The annualized performance over 45 months represented 1.3 by number and \$1.6 million by dollar amount. This represented a 75.0% increase by dollar volume since the prior CRA evaluation.

When compared to three other institutions operating within the assessment area, Fieldpoint’s annualized community development loans ranked fourth based on Tier 1 Capital, average assets, and deposits. The table below details the bank’s community development lending by assessment area.

<b>Community Development Lending by Assessment Area January 1, 2017 to December 31, 2023</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
MD 35614 (New York-Jersey City-White Plains, NY-NJ) Assessment Area	0	0	3	7,400	0	0	0	0	3	7,400
MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Assessment Area	0	0	0	0	0	0	1	1,200	1	1,200
MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA) Assessment Area	1	500	0	0	0	0	0	0	1	500
MSA 36740 (Orlando-Kissimmee-Sanford, FL) Assessment Area	0	0	0	0	0	0	0	0	0	0
Broader Statewide or Regional Area	0	0	1	250	1	1,319	1	5,800	3	7,369
<b>Total</b>	<b>1</b>	<b>500</b>	<b>4</b>	<b>7,650</b>	<b>1</b>	<b>1,319</b>	<b>2</b>	<b>7,000</b>	<b>8</b>	<b>16,469</b>

*Source: Bank Data from 1/1/2017– 12/31/2023*

### Community Development Investments

During the evaluation period, the bank reported 44 qualified investments totaling approximately \$2.1 million. This included 1 new qualified investment totaling \$1 million, 42 grants totaling \$181,000, and 1 prior period investment with an outstanding balance of \$960,000, which directly benefited MD 35614 (New York-Jersey City-White Plains, NY-NJ) and MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment areas. Fieldpoint’s annualized qualified investments ranked third based on Tier 1 capital, average assets, and deposits.

The new investment and prior period investment level represents annualized performance over 72 months of 0.33 by number and \$326,700 by dollar volume. Compared to the previous evaluation, where the bank’s annualized performance over 45 months of 2 investments totaled \$960,000, which represented a decrease of 37.5% by number and increase of 27.6% by dollar volume.

Additionally, the total level of grants represents an annualized performance over 72 months of 7 grants by number and \$30,000 by dollar volume. Approximately 90.5% (38 of 42) grants benefited community development organizations that offered services for LMI individuals. Compared to the previous evaluation, where the bank’s annualized performance over 45 months represented a decrease of 37.5% by number and increase of 24.2% by dollar volume. The table below details the bank’s community development investments and grants.

<b>Community Development Investments and Grants by Assessment Area January 1, 2017 to December 31, 2023</b>										
<b>Assessment Area</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
MD 35614 (New York-Jersey City-White Plains, NY-NJ) Assessment Area	1	1,000	6	15	0	0	0	0	7	1,015
MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Assessment Area	2	3	26	113	2	28	0	0	30	144
MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA) Assessment Area	0	0	1	3	0	0	0	0	1	3
MSA 36740 (Orlando-Kissimmee-Sanford, FL) Assessment Area	0	0	0	0	0	0	0	0	0	0
Broader Statewide or Regional Area	0	0	5	21	1	960	0	0	6	981
<b>Total</b>	<b>3</b>	<b>1,003</b>	<b>38</b>	<b>152</b>	<b>3</b>	<b>988</b>	<b>0</b>	<b>0</b>	<b>44</b>	<b>2,143</b>

Source: Bank Data from 1/1/2017 – 12/31/2023

### Community Development Services

During the evaluation period, Fieldpoint provided 84 community development services, which annualized over 72 months represented 14 services by count. Approximately 97.6% of the community services were due to Fieldpoint’s officers, directors, and staff serving as board members and providing technical expertise or financial literacy. At the prior evaluation, Fieldpoint provided 28 community development services, which annualized over 45 months represented 7.5 services by count. This represented an 87.4% increase in the number of community development services since the prior evaluation. The table below details the bank’s community development services.

<b>Community Development Services By Assessment Area January 1, 2017 to December 31, 2023</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
MD 35614 (New York-Jersey City-White Plains, NY-NJ) Assessment Area	0	19	0	0	<b>19</b>
MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Assessment Area	0	48	2	0	<b>50</b>
MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA) Assessment Area	0	4	0	0	<b>4</b>
MSA 36740 (Orlando-Kissimmee-Sanford, FL) Assessment Area	0	1	0	0	<b>1</b>
Broader Statewide or Regional Area	0	10	0	0	<b>10</b>
<b>Total</b>	<b>0</b>	<b>82</b>	<b>2</b>	<b>0</b>	<b>84</b>

*Source: Bank Data from 1/1/2017 – 12/31/2023*

## **FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

Fieldpoint was in compliance with the substantive provisions of the anti-discrimination laws and regulations. No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet the community credit needs of the assessment area was identified.

## STATE OF NEW YORK

### **CRA RATING FOR NEW YORK: NEEDS TO IMPROVE.**

**The Lending Test is rated: Needs to Improve.**

**The Community Development Test is rated: Satisfactory.**

The major factors supporting the rating include:

- The distribution of borrowers reflected, given the demographics of the assessment area, poor penetration among individuals of different income (including low- and moderate-income) levels.
- The geographic distribution of loans reflected poor dispersion throughout the assessment area.
- The bank's community development performance demonstrated adequate responsiveness to community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

### **SCOPE OF EVALUATION**

The evaluation of Fieldpoint's activities in the State of NY consisted of a full-scope review of MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. This assessment area is the only assessment area in NY.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN NEW YORK**

Fieldpoint's operations in the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area were entirely in NY County. Specific comments regarding the bank's operations are discussed under the MD 35614 (New York-Jersey City-White Plains, NY-NJ) evaluation.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK**

Conclusions regarding Fieldpoint's performance in NY were solely based on the performance in the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. Specific comments regarding the Lending and Community Development Tests are discussed under the MD 35614 (New York-Jersey City-White Plains, NY-NJ) Full Scope Review section.

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**METROPOLITAN AREA  
MD 35614 (NEW YORK-JERSEY CITY-WHITE PLAINS, NY-NJ)  
FULL SCOPE REVIEW**

**SCOPE OF EVALUATION**

Examiners conducted a full-scope review of MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area, which consisted of the entire NY County. The products, weighting, and evaluation described in the institution level Scope of Evaluation section were applicable to this assessment area analysis.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN MD 35614 (NEW YORK JERSEY CITY-WHITE PLAINS, NY-NJ)**

Fieldpoint operated 1 branch located in an unknown census tract in NY County, which represented 25.0% of the bank's total branches.

The assessment area reflected a highly competitive market for financial services. According to the Federal Deposit Insurance Company (FDIC) Deposit Market Share Report, as of June 30, 2023, 88 institutions operated 557 offices in the assessment area. Of these institutions, Fieldpoint ranked 43<sup>rd</sup> by total amount of deposits with less than 0.1% deposit market share. The top five institutions, which are all national banks, captured 81.1% of the deposit market share. Fieldpoint's operations in this assessment area accounted for 49.2% of the bank's total deposits. Home mortgage lending accounted for 25.0% of Fieldpoint's total HMDA lending.

**PERFORMANCE CONTEXT**

*Demographic Characteristics*

According to the 2020 U.S. Department of Commerce Bureau of the Census (U.S. Census), the population of this assessment area was 1,694,251. The assessment area consisted of 310 census tracts, of which 36 or 11.6% were low-income, 44 or 14.2% were moderate-income, 32 or 10.3% were middle-income, 175 or 56.5% were upper-income, and 23 or 7.4%, showed the income was unknown.

*Income Characteristics*

Based on the 2020 U.S. Census data, the assessment area had 325,483 families, of which 24.3% were low-income (approximately half or 12.0% were below the poverty level), 11.0% were moderate-income, 11.0% were middle-income, and 53.6% were upper-income. The table below depicts the MFIs for the assessment area for 2015 and 2020.



<b>MD 35614 (New York-Jersey City-White Plains, NY-NJ) Median Family Income Change</b>			
<b>Area</b>	<b>2015 MFI</b>	<b>2020 MFI</b>	<b>Percent Change</b>
Assessment Area	\$97,557	\$114,659	17.5
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	\$73,814	\$85,483	15.8
NY State	\$78,570	\$87,270	11.1
<i>Source: 2011 - 2015 and 2016-2020 U.S. Census American Community Survey (ACS) MFIs have been inflation-adjusted and are expressed in 2020 dollars.</i>			

### ***Housing Characteristics***

Based on the 2020 U.S. Census data, the assessment area had 884,828 housing units, of which 20.6% were owner-occupied, 65.1% were rental, and 14.3% were vacant. Of the total housing units, 11.3% were located in low-income census tracts, 14.0% in moderate-income census tracts, 9.4% in middle-income census tracts, 62.8% in upper-income census tracts, and 2.6% in census tracts where the income was unknown. In low-income census tracts, 4.9% of housing units were owner-occupied, 87.4% were rental units, and 7.7% were vacant. In moderate-income census tracts, 9.2% of housing units were owner-occupied, 83.4% were rental units, and 7.4% were vacant.

The median age of housing stock in this assessment area in both low- and moderate-income census tracts was 61 years old, with 49.5% of the stock built before 1950. According to the 2020 U.S. Census data, the median housing value in this assessment area was \$1,033,012, with an affordability ratio of 8.7. The median gross rent in the assessment area was \$1,786 per month. The table below details the housing characteristics in the assessment area.

<b>MD 35614 (New York-Jersey City-White Plains, NY-NJ) Housing Characteristics</b>			
<b>Geographic Area</b>	<b>2020 Median Housing Value</b>	<b>2020 Affordability Ratio</b>	<b>2020 Median Gross Rent</b>
Assessment Area	\$1,033,012	8.7	\$1,786
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	\$553,158	13.3	\$1,486
NY State	\$325,000	21.9	\$1,315
<i>Source: 2020 U.S. Census</i>			

### ***Housing Cost Burden***

Housing costs were relatively expensive in this assessment area, which indicated that affordable housing for LMI individuals and families continued to be a challenge. According to U.S. Department of Housing and Urban Development (HUD) 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 41.1% of all rental households had rental costs that exceeded 30.0% of their incomes, 70.6% of low-income rental households had rental costs that exceeded 30.0% of their income, and 50.0% of moderate-income rental households had rental costs that exceeded 30.0% of their income.

According to HUD's data, within this assessment area, 20.2% of homeowners had housing costs that exceeded 30% of their incomes, 59.9% of low-income homeowners had housing costs that exceeded 30.0%

of their income, and 41.0% of moderate-income homeowners had housing costs that exceeded 30.0% of their income. The table below details the housing cost burden in the assessment area.

<b>MD 35614 (New York-Jersey City-White Plains, NY-NJ) Housing Cost Burden</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	70.6%	50.0%	41.1%	59.9%	41.0%	20.2%
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	76.2%	42.6%	47.5%	75.9%	52.2%	32.8%
NY State	75.8%	39.3%	47.2%	70.9%	40.9%	26.4%

*\*Cost Burden is housing cost that equals 30 percent or more of household income  
Source: HUD, 2015-2019 Comprehensive Housing Affordability Strategy*

### ***Labor, Employment and Economic Characteristics***

According to D&B data, there were 144,404 businesses operating in this assessment area in 2022, of which 4.0% were located in low-income census tracts and 5.8% were located in moderate-income tracts. Of the total businesses operating in the assessment area, 85.2% were small businesses with a GAR of \$1 million or less, of which 4.0% were located in low-income census tracts and 8.1% were located in moderate-income census tracts.

According to the U.S. Bureau of Labor Statistics (BLS), from 2017 to 2019, unemployment rates in the assessment area, as well as NY State, steadily declined. However, the unemployment rate increased significantly in 2020, due to the COVID-19 pandemic that began in March 2020. In 2021, unemployment rates recovered slightly. The table below details the unemployment rates for 2017 to 2021.

<b>MD 35614 (New York-Jersey City-White Plains, NY-NJ) Unemployment Rates</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	4.0%	3.6%	3.4%	9.6%	7.6%
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	4.5%	4.0%	3.7%	11.5%	8.7%
NY State	4.6%	4.1%	3.8%	9.9%	6.9%

*Source: BLS Local Area Unemployment Statistics*

Additional demographic data for this assessment area is provided in the table below.

MD 35614 (New York-Jersey City-White Plains, NY-NJ)								
Assessment Area Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	36	11.6	48,143	14.8	16,018	33.3	79,178	24.3
Moderate-income	44	14.2	56,991	17.5	11,342	19.9	35,935	11.0
Middle-income	32	10.3	32,267	9.9	3,997	12.4	35,775	11.0
Upper-income	175	56.5	181,528	55.8	6,880	3.8	174,595	53.6
Unknown-income	23	7.4	6,554	2.0	762	11.6	0	0.0
<b>Total</b>	<b>310</b>	<b>100.0</b>	<b>325,483</b>	<b>100.0</b>	<b>38,999</b>	<b>12.0</b>	<b>325,483</b>	<b>100.0</b>
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	100,138	4,860	2.7	4.9	87,538	87.4	7,740	7.7
Moderate-income	123,528	11,414	6.3	9.2	103,030	83.4	9,084	7.4
Middle-income	82,844	13,458	7.4	16.2	61,304	74.0	8,082	9.8
Upper-income	555,246	150,057	82.2	27.0	307,218	55.3	97,971	17.6
Unknown-income	23,072	2,718	1.5	11.8	17,123	74.2	3,231	14.0
<b>Total</b>	<b>884,828</b>	<b>182,507</b>	<b>100.0</b>	<b>20.6</b>	<b>576,213</b>	<b>65.1</b>	<b>126,108</b>	<b>14.3</b>
	Total Businesses by		Businesses by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	5,783	4.0	5,388	4.4	364	1.8	31	2.3
Moderate-income	8,311	5.8	7,802	6.3	467	2.3	42	3.1
Middle-income	6,572	4.6	6,186	5.0	348	1.7	38	2.8
Upper-income	108,447	75.1	91,771	74.6	15,591	78.2	1,085	78.9
Unknown-income	15,291	10.6	11,935	9.7	3,177	15.9	179	13.0
<b>Total</b>	<b>144,404</b>	<b>100.0</b>	<b>123,082</b>	<b>100.0</b>	<b>19,947</b>	<b>100.0</b>	<b>1,375</b>	<b>100.0</b>
	Percentage of Total Businesses:			85.2		13.8		1.0
	Total Farms by		Farms by Tract & Revenue Size					
	Tract		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%

Low-income	15	5.1	15	5.2	0	0.0	0	0.0
Moderate-income	19	6.4	19	6.6	0	0.0	0	0.0
Middle-income	16	5.4	16	5.6	0	0.0	0	0.0
Upper-income	227	76.9	220	76.9	7	77.8	0	0.0
Unknown-income	18	6.1	16	5.6	2	22.2	0	0.0
<b>Total</b>	<b>295</b>	<b>100.0</b>	<b>286</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>96.9</b>		<b>3.1</b>		<b>.0</b>
<i>Source: 2022 FFIEC Census Data and 2022 D&amp;B Data</i>								

## Community Contacts

Examiners contacted two representatives to assist in identifying the credit and community development needs of the assessment area. Examiners interviewed a representative from an affordable housing nonprofit organization that offers programs and services to LMI individuals. The contact cited affordable housing as an urgent credit need, particularly for LMI families. Examiners also interviewed a representative from an economic development organization that provides small dollar loans under \$250,000 to women and minority owned small businesses. The contact indicated that there continues to be a need for small dollar loans for these types of businesses. Lastly, the contact indicated that there is also a need to provide training to small businesses that cover areas such as developing a business plan and retaining capital.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MD 35614 (NEW YORK-JERSEY CITY-WHITE PLAINS, NY-NJ)

### LENDING TEST

Fieldpoint's performance relative to the Lending Test is rated Needs to Improve. Lending performance in the assessment area was considered poor based on poor penetration among individuals of different income levels and businesses of different sizes and poor geographic distribution of lending. Please refer to Appendix B Aggregate Comparison Loan Distribution tables for more details.

### Borrower Distribution of Loans

The distribution of borrowers reflected, given the demographics of the assessment area, poor penetration among individuals of different income levels (including low- and moderate- income) and businesses of different sizes. Overall, home mortgage lending to LMI borrowers and lending to businesses with GARs of \$1 million or less was poor.

#### *Home Mortgage Loans*

The distribution of home mortgage loans reflected poor penetration among borrowers of different income levels.

In 2022, the bank did not originate any home mortgage loans to low or moderate-income borrowers, which reflected poor performance. The bank's lending to low-income borrowers was significantly below the 24.3% of low-income families and slightly less than aggregate, which made 0.5% by number and 0.3% by

dollar of home mortgage loans to low-income borrowers. The bank's lending to moderate-income borrowers was significantly below the 11.0% of moderate-income families and less than aggregate, which made 2.2% by number and 0.5% by dollar amount of home mortgage loans to moderate-income borrowers. Performance for all other years of the evaluation period was consistent with 2022 performance.

#### *Small Business Loans*

The distribution of small business loans reflected poor penetration of loans to businesses with GARs of \$1 million or less.

In 2022, Fieldpoint did not originate any loans to businesses with GARs of \$1 million or less, which reflected poor performance. This performance was significantly below the 85.2% of businesses with GARs of \$1 million or less. Performance in the other years of the evaluation period was the same as 2022, except for 2017. In 2017, the bank originated one loan, which represented 20.0% of loans by number, and 56.9% by dollar to businesses with GARs of \$1 million or less. The bank's lending to small businesses in 2017 was significantly below the 84.9% of businesses in the assessment area with GARs of \$1 million or less. The bank originated 40.0% of loans to assessment area businesses in amounts of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses.

### **Geographic Distribution of Loans**

The geographic distribution of loans reflected poor dispersion throughout the assessment area. Lending penetration in low-and moderate-income census tracts was poor for home mortgage and small business lending.

#### *Home Mortgage Loans*

The geographic distribution of home mortgage loans reflected poor dispersion throughout the assessment area.

In 2022, the bank did not make any home mortgage loans in low-or moderate-income census tracts, which reflected poor performance. The bank's home mortgage lending in low-income census tracts was below the 2.7% of owner-occupied housing units located in low-income census tracts and below the aggregate, which made 3.3% by number and 2.4% by dollar of home mortgage loans in low-income census tracts. The bank's performance in moderate-income census tracts was below the 6.3% of owner-occupied housing units located in moderate-income census tracts and below the aggregate, which made 4.9% by number and 3.5% by dollar of home mortgage loans in moderate-income census tracts. Performance in other years in the evaluation period was the same as the 2022 performance, except for 2019. In 2019, the bank did not make any home mortgage loans in low-income census tracts; however, the bank originated 2 loans in moderate-income census tract, which represented 40.0% by number and 62.8% by dollar. The bank's home lending performance was significantly above the 6.8% of owner-occupied housing units located in moderate-income census tracts and was above the aggregate, which made 7.9% by number and 8.9% by dollar of home purchase loans in moderate-income census tracts.

#### *Small Business Loans*

The geographic distribution of small business loans reflected poor dispersion throughout the assessment area.

In 2022, the bank did not make any small business loans in low-income or moderate-income census tracts, which reflected poor performance. The bank's small business lending performance in low-and moderate-income census tracts was below the percentage of businesses located in those geographies, which were

4.0% and 5.8%, respectively. Performance in other years in the evaluation period were the same as the 2022 performance, except for 2021. In 2021, the bank made no small business loans in low-income census tracts; however, it made 1 loan in a moderate-income census tract, which represented 11.1% by number and 43.6% by dollar of small business loans in moderate-income census tracts. Fieldpoint’s small business lending performance in moderate-income census tracts was above the 5.8% of businesses located in moderate-income census tracts.

***Analysis of Lending Gaps***

Fieldpoint did not originate home mortgage loans in a substantial majority of census tracts within this assessment area and gaps in penetration were evident in low- and moderate-income census tracts. During the evaluation period, the bank did not originate any loans in low-income census tracts. Other than 2019 and 2021, the bank did not originate any loans in moderate-income census tracts. In 2019, the bank originated 2 loans (3.5%), in moderate-income census tracts and in 2021, the bank originated 1 loan (1.8%), in a moderate-income census tract.

According to the 2022 U.S. Census, 14.8% of families resided in low-income census tracts and 11.3% of housing units were in low-income census tracts. Approximately, 17.5% of families resided in moderate-income census tracts and 14.0% of housing units were in moderate-income census tracts. The owner occupancy rate for low-income census tracts was 4.9%, and 9.2% for moderate-income census tracts. The table below provides more detail.

<b>MD 35614 (New York-Jersey City-White Plains, NY-NJ)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2017 - December 31, 2022</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2017</b>			
Low	44	44	0%
Moderate	51	51	0%
Middle	20	20	0%
Upper	158	153	3%
Income Unknown	15	15	0%
<b>2018</b>			
Low	44	44	0%
Moderate	51	51	0%
Middle	20	20	0%
Upper	158	154	3%
Income Unknown	15	15	0%
<b>2019</b>			
Low	34	34	0%
Moderate	57	55	4%
Middle	21	20	5%
Upper	161	158	2%

Income Unknown	15	15	0%
<b>2020</b>			
Low	34	34	0%
Moderate	57	57	0%
Middle	21	21	0%
Upper	161	153	5%
Income Unknown	15	15	0%
<b>2021</b>			
Low	34	34	0%
Moderate	57	56	2%
Middle	21	21	0%
Upper	161	150	7%
Income Unknown	15	15	0%
<b>2022</b>			
Low	36	36	0%
Moderate	44	44	0%
Middle	32	32	0%
Upper	175	169	3%
Income Unknown	23	23	0%

## COMMUNITY DEVELOPMENT TEST

Fieldpoint's performance under the Community Development Test is rated Satisfactory. Fieldpoint's performance under the Community Development Test in the assessment area demonstrated adequate responsiveness to community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

### Community Development Loans

Fieldpoint made an adequate level of loans in this assessment area. During the evaluation period, Fieldpoint made 3 community development loans totaling \$7.4 million inside the assessment area and 3 community development loans totaling \$7.4 million that benefited the broader statewide regional area. By number, this represents 75.0% of total community development loans, and 89.7% by dollar amount originated by the bank during the evaluation period. The table below provides more details.

<b>MD 35614 Assessment Area Community Development Lending January 1, 2017 to December 31, 2023</b>										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2017	0	0	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	0	0	0	0
2019	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	1	5,500	0	0	0	0	1	5,500
2022	0	0	1	650	0	0	0	0	1	650
2023	0	0	1	1,250	0	0	0	0	1	1,250
Broader Statewide or Regional Area	0	0	1	250	1	1,319	1	5,800	3	7,369
<b>Total</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>7,650</b>	<b>1</b>	<b>1,319</b>	<b>1</b>	<b>5,800</b>	<b>6</b>	<b>14,769</b>

*Source: Bank Data 1/1/2017 – 12/31/2023*

Examples of community development lending that benefited the assessment area include the following:

- In 2021, the bank participated in an \$11.0 million loan. The loan provided funds to renovate a nonprofit, special educational school located in a low-income census tract. The school receives tuition reimbursements from NY State and a majority of the students are from LMI families. The bank’s share of the participation was \$5.5 million, which helped provide community services to LMI residents.
- In 2023, the bank provided a revolving line of credit of \$650,000 to bridge tuition reimbursement from NY State for a school located in a low-income census tract. A significant majority of the students attending the school were LMI individuals that receive tuition reimbursement. The proceeds helped provide community services to LMI residents.
- In 2022, the bank originated a \$5.8 million loan to refinance and improve a warehouse located in a moderate-income census tract. The proceeds helped revitalize and stabilize the area by improving a business in a moderate-income geography.

### Community Development Investments

During the evaluation period, Fieldpoint made 7 qualified investments and grants totaling approximately \$1 million. This included 1 new investment totaling \$1 million and 6 qualified grants totaling \$15,000. Of the total six grants, four were made inside the assessment area and two were made in the broader statewide regional area. The table below provides more details.



MD 35614 Assessment Area Qualified Investments and Grants January 1, 2017 to December 31, 2023										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
<b>Prior Period</b>	0	0	0	0	0	0	0	0	0	0
<b>Total Investments</b>	1	1,000	0	0	0	0	0	0	1	1,000
<b>Total Grants</b>	0	0	6	15	0	0	0	0	6	15
<b>Grand Total</b>	1	1,000	6	15	0	0	0	0	7	1,015

*Source: Bank Data from 1/1/2017 – 12/31/2023*

- Fieldpoint invested \$1 million in a Community Development Fund (Fund) that invested in government agency securities. The Fund focuses exclusively on providing affordable housing for LMI borrowers and benefited the assessment area.
- The bank donated \$5,000 to a community organization that provided services for immigrants, including workforce development, adult education, and free legal services.

### Community Development Services

During the evaluation period, Fieldpoint provided 19 community development services in this assessment area. The provision of these services included Fieldpoint officers, directors, and employees who served on boards or committees of nonprofit organizations and provided technical assistance. Of the total services, 1 (5.3%) service provided technical expertise to an organization that supported affordable housing, and 18 (94.7%) were to organizations that provided community services, including financial literacy training and technical assistance to LMI individuals. Examples of community development services include:

- One senior director served as a board member of a fund that provided financial aid and scholarship support to the students at a school where majority of the students are from LMI areas.
- One senior director provided 300 hours of pro bono legal services at a nonprofit legal aid organization that helped immigrants who are pursued by debt collectors.

## STATE OF CONNECTICUT

### **CRA RATING FOR CONNECTICUT: NEEDS TO IMPROVE.**

**The Lending Test is rated: Needs to Improve.**

**The Community Development Test is rated: Satisfactory.**

The major factors supporting the rating include:

- The distribution of borrowers reflected, given the demographics of the assessment area, poor penetration among individuals of different income levels (including low- and moderate-income) and business of different sizes.
- The geographic distribution of loans reflected poor dispersion throughout the assessment area.
- The bank's community development performance demonstrated adequate responsiveness to community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

### **SCOPE OF EVALUATION**

The evaluation of Fieldpoint's activities in the State of CT consisted of a full scope review of MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area. This assessment area is the only assessment area in CT.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF CONNECTICUT**

Fieldpoint's operations in MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area were entirely in Fairfield County. Specific comments regarding the bank's operations are discussed under the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) evaluation.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF CONNECTICUT**

Conclusions regarding Fieldpoint's performance in the State of CT were solely based on the performance in the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area. Specific comments regarding the Lending Test and Community Development Test are discussed under the MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Full Scope Review section.

**METROPOLITAN AREA  
MSA 14860 (BRIDGEPORT-STAMFORD-NORWALK, CT)  
FULL SCOPE REVIEW**

**SCOPE OF EVALUATION**

Examiners conducted a full-scope review of MSA 14860 (Bridgeport-Stamford-Norwalk, CT) assessment area, which consisted of the entire Fairfield County. The products, weighting, and evaluation described in the institution level Scope of Evaluation section were applicable to this assessment area analysis.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN MSA 14860 (BRIDGEPORT-STAMFORD-NORWALK, CT)**

Fieldpoint operated one branch in an upper-income census tract in Fairfield County, which represented 25.0% of the bank’s total branches.

The assessment area reflected a highly competitive market for financial services. According to the FDIC Deposit Market Share Report, as of June 30, 2023, 26 institutions operated 295 offices in the assessment area. Of these institutions, Fieldpoint ranked 17<sup>th</sup> by total deposits with a 0.7% deposit market share. The top five institutions, all large national and regional banks captured 74.7% of the deposit market share. Fieldpoint’s operations in Fairfield County accounted for 47.5% of the bank’s total deposits.

**PERFORMANCE CONTEXT**

*Demographic Characteristics*

According to the 2020 U.S. Census, the population of this assessment area was 957,419. The assessment area consisted of 227 census tracts, of which 35 or 15.4% were low-income, 46 or 20.3% were moderate-income, 59 or 26.0% were middle-income, 85 or 37.4% were upper-income, and 2 or 0.9% where the income was unknown.

*Income Characteristics*

Based on the 2020 U.S. Census, the assessment area had 239,503 families, of which 25.1% were low-income (6.3% of which were below the poverty level), 15.1% were moderate-income, 17.7% were middle-income, and 42.0% were upper-income. The table below depicts the MFIs for the assessment area for 2015 and 2020.

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Median Family Income Change</b>			
<b>Area</b>	<b>2015 MFI</b>	<b>2020 MFI</b>	<b>Percent Change</b>
Assessment Area	\$115,407	\$120,156	4.1
MSA 14860 (Bridgeport-Stamford-Norwalk, CT)	\$115,407	\$120,156	4.1
State of CT	\$97,273	\$102,061	4.9
<i>Source: 2011 – 2015 and 2016-2020 U.S. Census, ACS MFIs have been inflation-adjusted and are expressed in 2020 dollars.</i>			

***Housing Characteristics***

Based on the 2020 U.S. Census data, the assessment area had 374,329 housing units, of which 61.5% were owner-occupied, 30.7% were rental, and 7.8% were vacant. Of the total housing units, 13.4% were located in low-income census tracts, 22.7% in moderate-income census tracts, 29.1% in middle-income census tracts, 34.6% in upper-income census tracts, and 0.2% in census tracts where the income was unknown. In low-income census tracts, 25.8% of housing units were owner-occupied, 64.1% were rental units, and 10.1% were vacant. In moderate-income census tracts, 46.2% of housing units were owner-occupied, 45.4% were rental units, and 8.4% were vacant.

The median age of housing stock in this assessment area was 60 years old, with 27.6% of the stock built before 1950. The median age of housing stock was 61 years in low-income census tracts and also in moderate-income census tracts. According to the 2020 U.S Census, the median housing value in this assessment area was \$432,961 with an affordability ratio of 22.4. The median gross rent in the assessment area was \$1,512 per month. The table below details the housing characteristics in the assessment area.

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>			
<b>Housing Characteristics</b>			
<b>Geographic Area</b>	<b>2020 Median Housing Value</b>	<b>2020 Affordability Ratio</b>	<b>2020 Median Gross Rent</b>
Assessment Area	\$432,961	22.4	\$1,512
MSA 14860 (Bridgeport-Stamford-Norwalk, CT)	\$432,961	22.4	\$1,512
State of CT	\$279,700	28.6	\$1,201
<i>Source: 2020 U.S. Census Bureau ACS</i>			

***Housing Cost Burden***

Housing costs were relatively expensive in this assessment area, which indicated that affordable housing for LMI individuals and families continued to be a challenge. According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 49.4% of all rental households had rental costs that exceeded 30% of their incomes, 77.2% of low-income rental households had rental costs that exceeded 30% of their income, and 42.1% of moderate-income rental households had rental costs that exceeded 30% of their income. According to HUD's data, within this assessment area, 30.7% of homeowners had housing costs that exceeded 30% of their incomes, 81.5% of low-income homeowners had housing costs that exceeded 30% of their income, and 57.5% of moderate-income homeowners had housing costs that exceeded 30% of their income. The table below details the housing cost burden in the assessment area.

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>						
<b>Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden – Renters</b>			<b>Cost Burden – Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	77.2%	42.1%	49.4%	81.5%	57.5%	30.7%
MSA 14860 (Bridgeport-Stamford-Norwalk, CT)	77.2%	42.1%	49.4%	81.5%	57.5%	30.7%
State of CT	74.6%	33.5%	46.4%	78.9%	46.4%	26.3%

*\*Cost Burden is housing cost that equals 30 percent or more of household income  
Source: HUD, 2015-2019 Comprehensive Housing Affordability Strategy*

***Labor, Employment and Economic Characteristics***

According to D&B data, there were 67,476 businesses operating in this assessment area in 2022, of which 8.7% were located in low-income census tracts and 19.0% were located in moderate-income census tracts. Of the total businesses operating in the assessment area, 91.7% were small businesses with GARs of \$1 million or less, of which 8.6% were located in low-income census tracts and 18.8% were located in moderate-income census tracts.

According to the BLS, from 2017 to 2019, unemployment rates in the assessment area, as well as overall in the State of CT, steadily declined. However, the unemployment rate increased significantly in 2020, due to the COVID-19 pandemic that began in March 2020. In 2021, unemployment rates started to decrease slightly. Please refer to the table below for more details.

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>					
<b>Unemployment Rates</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	4.3%	3.8%	3.4%	7.8%	6.1%
MSA 14860 (Bridgeport-Stamford-Norwalk, CT)	4.3%	3.8%	3.4%	7.8%	6.1%
State of CT	4.4%	3.9%	3.5%	7.8%	6.3%

*Source: BLS Local Area Unemployment Statistics*

The table below provides additional demographic data for this assessment area.

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>								
<b>Assessment Area Demographics</b>								
<b>Income Categories</b>	<b>Tract Distribution</b>		<b>Families by Tract Income</b>		<b>Families &lt; Poverty Level as % of Families by Tract</b>		<b>Families by Family Income</b>	
	#	%	#	%	#	%	#	%
Low-income	35	15.4	28,299	11.8	5,886	20.8	60,151	25.1
Moderate-income	46	20.3	48,393	20.2	4,828	10.0	36,208	15.1
Middle-income	59	26.0	70,417	29.4	2,151	3.1	42,479	17.7
Upper-income	85	37.4	92,065	38.4	2,022	2.2	100,665	42.0
Unknown-income	2	0.9	329	0.1	172	52.3	0	0.0
<b>Total Assessment Area</b>	<b>227</b>	<b>100.0</b>	<b>239,503</b>	<b>100.0</b>	<b>15,059</b>	<b>6.3</b>	<b>239,503</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	50,243	12,957	5.6	25.8	32,197	64.1	5,089	10.1
Moderate-income	85,021	39,310	17.1	46.2	38,576	45.4	7,135	8.4
Middle-income	108,939	77,848	33.8	71.5	23,567	21.6	7,524	6.9
Upper-income	129,363	99,911	43.4	77.2	20,046	15.5	9,406	7.3
Unknown-income	763	97	0.0	12.7	561	73.5	105	13.8
<b>Total Assessment Area</b>	<b>374,329</b>	<b>230,123</b>	<b>100.0</b>	<b>61.5</b>	<b>114,947</b>	<b>30.7</b>	<b>29,259</b>	<b>7.8</b>
	<b>Total Businesses by Tract</b>		<b>Businesses by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%
Low-income	5,881	8.7	5,303	8.6	530	11.1	48	5.9
Moderate-income	12,852	19.0	11,647	18.8	1,113	23.2	92	11.3
Middle-income	18,018	26.7	16,675	27.0	1,182	24.7	161	19.8
Upper-income	30,682	45.5	28,209	45.6	1,963	41.0	510	62.8
Unknown-income	43	0.1	38	0.1	4	0.1	1	0.1
<b>Total Assessment Area</b>	<b>67,476</b>	<b>100.0</b>	<b>61,872</b>	<b>100.0</b>	<b>4,792</b>	<b>100.0</b>	<b>812</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>91.7</b>		<b>7.1</b>		<b>1.2</b>
	<b>Total Farms by Tract</b>		<b>Farms by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	

	#	%	#	%	#	%	#	%
Low-income	22	6.4	22	6.5	0	0.0	0	0.0
Moderate-income	27	7.8	26	7.6	1	20.0	0	0.0
Middle-income	103	29.9	103	30.3	0	0.0	0	0.0
Upper-income	193	55.9	189	55.6	4	80.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total Assessment Area</b>	<b>345</b>	<b>100.0</b>	<b>340</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>98.6</b>		<b>1.4</b>		<b>.0</b>
<i>2022 FFIEC Census Data and 2022 D&amp;B Data</i>								

## Community Contacts

Examiners conducted a community contact interview with a foundation that provides grants to community development organizations, nonprofits, and businesses. The contact noted that the area is a very poor community with a large concentration of LMI families. The contact stated that the financial challenges that existed prior to the COVID-19 pandemic have worsened for many LMI individuals and families. The representative also indicated that access to homeownership is a major challenge for many individuals and there is a need for more affordable housing. Lastly, the representative indicated that programs that support financial education are also a community development need.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 14860 (BRIDGEPORT-STAMFORD-NORWALK, CT)

### LENDING TEST

Fieldpoint's performance relative to the Lending Test is rated Needs to Improve. Lending performance in the assessment area was considered poor based on poor penetration among individuals of different income levels and businesses of different sizes and poor geographic distribution of lending. Please refer to Appendix B Aggregate Comparison Loan Distribution tables for more details.

### Borrower Distribution of Loans

The distribution of borrowers reflected, given the demographics of this assessment area, poor penetration among individuals of different income levels (including low- and moderate-income levels) and businesses of different sizes. Overall, home mortgage lending to LMI borrowers and lending to businesses with GARs of \$1 million or less was poor.

#### *Home Mortgage Loans*

The distribution of borrowers reflected, given the demographics of the assessment area, poor penetration among low- and moderate-income borrowers for home mortgage loans.

In 2022, the bank did not originate any home mortgage loans to low or moderate-income borrowers, which reflected poor performance. The bank's lending to low-income borrowers was significantly below the

25.1% of low-income families and less than aggregate, which made 8.4% by number and 3.3% by dollar of home mortgage loans to low-income borrowers. The bank's lending to moderate-income borrowers was significantly below the 15.1% of moderate-income families and well below aggregate, which made 18.6% by number and 10.1% by dollar amount of home mortgage loans to moderate-income borrowers. Performance for all other years of the evaluation period was the same as 2022, except for 2021. In 2021 the bank made one loan to moderate-income borrowers. For this year, the bank originated 5.0% of loans by number and 17.3% by dollar amount to moderate-income borrowers, which was significantly below the 15.1% of moderate-income families in the assessment area.

#### *Small Business Loans*

The distribution of borrowers reflected, given the demographics of the assessment area, poor penetration among borrowers for small business lending.

In 2022, the bank originated only one loan to a business with GARs of \$1 million or less. The bank's lending to small businesses was similar to the 91.7% percentage of businesses in the assessment area with GARs of \$1 million or less. The bank also originated its sole loan to a business in the amount of \$100,000 or less, which are typically considered more responsive to the credit needs of very small businesses. In all other years of the review period, the bank's performance was below 2022.

#### **Geographic Distribution of Loans**

The geographic distribution of loans reflected poor dispersion throughout the assessment area. Lending penetration in LMI census tracts was poor for home mortgage and poor for small business loans.

#### *Home Mortgage Loans*

The geographic distribution of home mortgage loans reflected poor dispersion throughout the assessment area.

In 2022, the bank did not originate any home mortgage loans in low- or moderate-income census tracts, which reflected poor performance. The bank's performance in low-income census tracts was below the 5.6% of owner-occupied housing units located in those geographies and below the aggregate, which made 5.8% by number and 3.9% by dollar of home mortgage loans in low-income census tracts. The bank's performance in moderate-income census tracts was significantly below the 17.1% of owner-occupied housing units located in those geographies and significantly below the aggregate, which made 17.3% by number and 12.1% by dollar of home mortgage loans in moderate-income census tracts. The bank's performance in LMI tracts in 2020, 2019, and 2017 was comparable to 2022 performance, while the lending performance in 2021 and 2018, was minimally better than the 2022 performance.

#### *Small Business Loans*

The geographic distribution of small business loans reflected poor penetration throughout the assessment area.

In 2022, the bank did not make any small business loans in low- or moderate-income census tracts, which reflected poor performance. The bank's small business lending performance in low- and moderate-income census tracts was significantly below the percentage of businesses located in those geographies, which were 8.7% and 19.0%, respectively. Performance in other years in the evaluation period were the same as 2022, except for 2021. In 2021, the bank made 10.0% by number and 19.0% by dollar of small business loans in low-income census tracts. The bank's small business lending performance in low-income census tracts was slightly above the 8.7% of businesses located in low-income census tracts. In 2021, the bank made 10.0%



by number and 20.7% by dollar of small business loans in moderate-income census tracts. Fieldpoint’s small business lending performance in moderate-income census tracts was well below the 19.0% of businesses located in moderate-income census tracts.

***Analysis of Lending Gaps***

Fieldpoint did not originate home mortgage loans in a substantial majority of the census tracts within the assessment area and gaps in penetration were evident in low-and moderate- income tracts. The bank did not originate any loans in low-income census tract in 2022 and 2019. In 2020, 2018, and 2017, the bank originated loans in 1 of 6 (16.7%) low-income census tracts, and in 2021, in 2 of 31 (6.5%) low-income census tracts. The bank did not originate any loans in moderate-income census tracts in 2022, 2020, 2019, and 2017. In 2018, Fieldpoint originated loans in 2 of 12 (16.7%) moderate-income census tracts, and in 2021, 2 of 38 (5.3%) moderate-income census tracts.

According to the 2022 U.S. Census data, 11.8% of families resided in low-income census tracts and 13.4% of housing units were in low-income census tracts. According to the 2022 U.S. Census data, 20.2% of families resided in moderate-income census tracts and 22.7% of housing units were in moderate income census tracts. The owner occupancy rate for low-income census tracts was 25.8%, and 46.2%, for moderate-income census tracts. The below table details the bank’s penetration in low-, moderate-, middle-, and upper-income census tracts.

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2017 - December 31, 2022</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2017</b>			
Low	6	5	17%
Moderate	12	12	0%
Middle	20	20	0%
Upper	46	37	20%
Income Unknown	0	0	0%
<b>2018</b>			
Low	6	5	17%
Moderate	12	10	17%
Middle	20	17	15%
Upper	46	41	11%
Income Unknown	0	0	0%
<b>2019</b>			
Low	6	6	0%
Moderate	12	12	0%
Middle	20	20	0%
Upper	46	39	15%
Income Unknown	0	0	0%

<b>2020</b>			
Low	6	5	17%
Moderate	12	12	0%
Middle	20	17	15%
Upper	46	37	20%
Income Unknown	0	0	0%
<b>2021</b>			
Low	31	29	6%
Moderate	40	38	5%
Middle	57	53	7%
Upper	81	68	16%
Income Unknown	2	2	0%
<b>2022</b>			
Low	35	35	0%
Moderate	46	46	0%
Middle	59	57	3%
Upper	85	78	8%
Income Unknown	2	2	0%

## **COMMUNITY DEVELOPMENT TEST**

Fieldpoint’s performance under the Community Development Test in the assessment area demonstrated adequate responsiveness to community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s assessment area.

### **Community Development Loans**

During the evaluation period, Fieldpoint originated 1 community development loan totaling \$1.2 million. By number, this represented 13.0% of total community development loans and by dollar amount, it represented 7.3% of total community development loans. The purpose of the community development loan was to acquire and improve an industrial building located in a moderate-income census tract, which was also a Connecticut Opportunity Zone.

### **Community Development Investments**

During the evaluation period, Fieldpoint made 30 grants totaling approximately \$144,000. The table below provides more detail.

<b>MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Assessment Area Qualified Grants</b>										
<b>Year</b>	<b>Affordable Housing</b>		<b>Community Services</b>		<b>Economic Development</b>		<b>Revitalize or Stabilize</b>		<b>Totals</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
<b>Total Grants</b>	<b>2</b>	<b>3</b>	<b>26</b>	<b>113</b>	<b>2</b>	<b>28</b>	<b>0</b>	<b>0</b>	<b>30</b>	<b>144</b>
<b>Grand Total</b>	<b>2</b>	<b>3</b>	<b>26</b>	<b>113</b>	<b>2</b>	<b>28</b>	<b>0</b>	<b>0</b>	<b>30</b>	<b>144</b>

*Source: Bank Data from 1/1/2017 – 12/31/2023*

Examples of qualified grants include:

- The bank extended 3 grants totaling \$57,500 to a nonprofit organization in Fairfield County. The organization provides temporary housing and shelter programs for the homeless, assists with food shortage needs, and provides financial education seminars and loan programs to LMI families.
- The bank provided 1 grant totaling \$4,000 to a community organization that fights childhood hunger by providing children in need with meals on the weekends.

### **Community Development Services**

During the evaluation period, Fieldpoint provided 50 community development services. Of these services, ten were attributable to board memberships at community service and economic development organizations. In 38 instances, employees provided financial literacy training to LMI students. Sessions included education on stock markets, investments, and basic banking. Examples of community development services include:

- From 2019 through 2023, one director served as a board member of a nonprofit community organization that provides a summer youth employment program for low-income youth.
- During the evaluation period, 34 employees provided four financial literacy training events to LMI students. Topics covered during the trainings included career paths, budgeting, and basic banking.

## STATE OF GEORGIA

### **CRA RATING FOR THE STATE OF GEORGIA: NEEDS TO IMPROVE.**

**The Lending Test is rated: Needs to Improve.**

**The Community Development Test is rated: Needs to Improve.**

The major factors supporting the rating include:

- The distribution of borrowers reflected, given the demographics of the assessment area, poor penetration among individuals of different income (including low- and moderate-income) levels and poor among businesses of different sizes.
- The geographic distribution of loans reflected poor dispersion throughout the assessment area.
- The bank's community development performance demonstrated poor responsiveness to community development needs of its assessment area through qualified investments and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

### **SCOPE OF EVALUATION**

The evaluation of Fieldpoint's activities in the State of GA consisted of a full scope review of the partial MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA) assessment area. This is the only assessment area in GA.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF GEORGIA**

Fieldpoint's operations in the MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA) assessment area were entirely in Fulton County. Specific comments regarding the bank's operations are discussed under the MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA) evaluation.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF GEORGIA**

Conclusions regarding Fieldpoint's performance in GA were solely based on the performance in MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA) assessment area. Specific comments regarding the Lending and Community Development Tests are discussed under the MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA) Full Scope Review section.

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**METROPOLITAN AREA  
MSA 12060 (ATLANTA-SANDY SPRINGS-ALPHARETTA, GA)  
FULL SCOPE REVIEW**

**SCOPE OF EVALUATION**

Examiners conducted a full-scope review of MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA) assessment area, which consisted of the entire Fulton County. The products, weighting, and evaluation described in the institution level Scope of Evaluation section were applicable to this assessment area analysis. Fieldpoint's operations in Fulton County were limited as this assessment area was delineated in August 2021, when management opened the branch located in Atlanta.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 12060 ATLANTA-SANDY SPRINGS-ALPHARETTA, GA**

Fieldpoint operated one branch in an upper-income census tract in Fulton County, which represented 25.0% of the bank's total branches.

The assessment area reflected a highly competitive market for financial services. According to the FDIC Deposit Market Share Report, as of June 30, 2023, 48 institutions operated 254 offices in the assessment area. Of these institutions, Fieldpoint ranked 42<sup>nd</sup> by total amount of deposits with less than 0.1% deposit market share. The top five institutions, all regional and national banks, captured 81.6% of the deposit market share. Fieldpoint's deposit operations in Fulton County accounted for 1.7% of the bank's total deposits. HMDA lending in this assessment area, represented 7.8% of Fieldpoint's total HMDA lending. Given the bank's limited operations in this assessment area, the bank's performance less weight when deriving overall conclusions.

**PERFORMANCE CONTEXT**

*Demographic Characteristics*

According to the 2020 U.S. Census data, the population of this assessment area was 1,066,710. The assessment area consisted of 327 census tracts, of which 44 or 13.5% were low-income, 51 or 15.6% were moderate-income, 42 or 12.8% were middle-income, 156 or 47.7% were upper-income, and 34 or 10.4% where the income was unknown.

*Income Characteristics*

Based on the 2020 U.S. Census data, the assessment area had 229,604 families, of which 22.0% were low-income (9.6% of which were below the poverty level), 13.3% were moderate-income, 15.5% were middle-income, and 49.2% were upper-income. The table below depicts the MFIs for the assessment area for 2015 and 2020.

<b>MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA)</b>			
<b>Median Family Income Change</b>			
<b>Area</b>	<b>2015 MFI</b>	<b>2020 MFI</b>	<b>Percent Change</b>
Assessment Area	\$84,631	\$99,490	17.6
MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA)	\$73,554	\$84,791	15.3
State of GA	\$64,910	\$74,127	14.2
<i>Source: 2011 - 2015 and 2016-2020 U.S. Census Bureau ACS</i>			
<i>MFI's have been inflation-adjusted and are expressed in 2020 dollars.</i>			

### ***Housing Characteristics***

Based on the 2020 U.S. Census data, the assessment area had 479,696 housing units, of which 47.1% were owner-occupied, 42.0% were rental, and 10.9% were vacant. Of the total housing units, 12.6% were located in low-income census tracts, 16.6% in moderate-income census tracts, 13.8% in middle-income census tracts, 49.0% in upper-income census tracts, and 8.0% in an unknown-income census tract. In low-income census tracts, 21.9% of housing units were owner-occupied, 59.6% were rental units, and 18.5% were vacant. In moderate-income census tracts, 39.8% of housing units were owner-occupied, 45.6% were rental units, and 14.6% were vacant.

The median age of housing stock in this assessment area was 38 years old, with 9.7% of the stock built before 1950. The median age of housing stock was 53 years in low-income census tracts and 47 years in moderate-income census tracts. According to the 2020 U.S. Census data, the median housing value in this assessment area was \$326,708 with an affordability ratio of 22.2. The median gross rent in the assessment area was \$1,264 per month. Please refer to the table below for more details.

<b>MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA)</b>			
<b>Housing Characteristics</b>			
<b>Geographic Area</b>	<b>2020 Median Housing Value</b>	<b>2020 Affordability Ratio</b>	<b>2020 Median Gross Rent</b>
Assessment Area	\$326,708	22.2	\$1,264
MSA 12060 (Atlanta- Sandy Springs- Alpharetta, GA)	\$233,739	30.5	\$1,204
State of GA	\$190,200	32.2	\$1,042
<i>Source: 2020 U.S. Census Bureau ACS</i>			

### ***Housing Cost Burden***

Housing costs were relatively expensive in this assessment area, which indicated that affordable housing for LMI individuals and families continued to be a challenge. According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 44.5% of all rental households had rental costs that exceeded 30% of their incomes, 77.1% of low-income rental households had rental costs that exceeded 30% of their income, and 54.0% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 20.4% of homeowners had housing costs that exceeded 30% of their incomes, 65.8% of low-income homeowners had housing costs that exceeded 30%

of their income, and 41.3% of moderate-income homeowners had housing costs that exceeded 30% of their income. Please refer to the table below for more details.

<b>MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA) Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	77.1%	54.0%	44.5%	65.8%	41.3%	20.4%
MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA)	80.4%	46.1%	44.7%	62.9%	34.1%	19.6%
State of GA	76.6%	43.5%	43.4%	59.4%	32.0%	19.3%

*\*Cost Burden is housing cost that equals 30 percent or more of household income  
Source: (HUD, 2015-2019 Comprehensive Housing Affordability Strategy)*

### ***Labor, Employment and Economic Characteristics***

According to D&B data, there were 89,544 businesses operating in this assessment area in 2022, of which 6.6% were located in low-income census tracts and 13.3% were located in moderate-income census tracts. Of the total businesses operating in the assessment area, 91.9% were small businesses with a GAR of \$1 million or less, of which 6.8% were located in low-income census tracts and 13.5% were located in moderate-income census tracts.

According to the BLS, for the period 2017 to 2019, unemployment rates in the assessment area, as well as in GA, steadily declined. However, the unemployment rate increased significantly in 2020, due to the COVID-19 pandemic that began in March 2020. In 2021, unemployment rates recovered significantly. Please refer to the table below for more details.

<b>MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA) Unemployment Rates</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	4.9%	4.1%	3.7%	7.9%	4.7%
MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA)	4.6%	3.8%	3.4%	6.8%	3.9%
State of Georgia	4.8%	4.0%	3.6%	6.5%	3.9%

*Source: BLS, Local Area Unemployment Statistics*

The table below provides additional performance context data for this assessment area:

<b>MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA)</b>								
<b>Assessment Area Demographics</b>								
<b>Income Categories</b>	<b>Tract Distribution</b>		<b>Families by Tract Income</b>		<b>Families &lt; Poverty Level as % of Families by Tract</b>		<b>Families by Family Income</b>	
	#	%	#	%	#	%	#	%
Low-income	44	13.5	25,129	10.9	7,675	30.5	50,623	22.0
Moderate-income	51	15.6	36,924	16.1	5,812	15.7	30,425	13.3
Middle-income	42	12.8	33,029	14.4	2,151	6.5	35,638	15.5
Upper-income	156	47.7	124,380	54.2	4,056	3.3	112,918	49.2
Unknown-income	34	10.4	10,142	4.4	2,303	22.7	0	0.0
<b>Total Assessment Area</b>	<b>327</b>	<b>100.0</b>	<b>229,604</b>	<b>100.0</b>	<b>21,997</b>	<b>9.6</b>	<b>229,604</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
		#	%	%	#	%	#	%
Low-income	60,241	13,204	5.8	21.9	35,873	59.5	11,164	18.5
Moderate-income	79,799	31,773	14.1	39.8	36,417	45.6	11,609	14.5
Middle-income	66,286	30,948	13.7	46.7	29,887	45.1	5,451	8.2
Upper-income	234,912	138,804	61.4	59.1	76,805	32.7	19,303	8.2
Unknown-income	38,458	11,174	4.9	29.1	22,494	58.5	4,790	12.5
<b>Total Assessment Area</b>	<b>479,696</b>	<b>225,903</b>	<b>100.0</b>	<b>47.1</b>	<b>201,476</b>	<b>42.0</b>	<b>52,317</b>	<b>10.9</b>
	<b>Total Businesses by Tract</b>		<b>Businesses by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%
Low-income	5,912	6.6	5,603	6.8	262	4.2	47	4.4
Moderate-income	11,928	13.3	11,066	13.5	745	12.0	117	11.0
Middle-income	10,386	11.6	9,809	11.9	461	7.4	116	10.9
Upper-income	53,518	59.8	48,690	59.2	4,134	66.5	694	65.0
Unknown-income	7,800	8.7	7,090	8.6	616	9.9	94	8.8
<b>Total Assessment Area</b>	<b>89,544</b>	<b>100.0</b>	<b>82,258</b>	<b>100.0</b>	<b>6,218</b>	<b>100.0</b>	<b>1,068</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>91.9</b>		<b>6.9</b>		<b>1.2</b>
	<b>Total Farms by Tract</b>	<b>Farms by Tract &amp; Revenue Size</b>						
		<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>



	#	%	#	%	#	%	#	%
Low-income	15	4.8	15	4.9	0	0.0	0	0.0
Moderate-income	47	15.0	45	14.7	2	28.6	0	0.0
Middle-income	32	10.2	32	10.4	0	0.0	0	0.0
Upper-income	199	63.4	195	63.5	4	57.1	0	0.0
Unknown-income	21	6.7	20	6.5	1	14.3	0	0.0
<b>Total Assessment Area</b>	<b>314</b>	<b>100.0</b>	<b>307</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>97.8</b>		<b>2.2</b>		<b>.0</b>
<i>2022 FFIEC Census Data and 2022 D&amp;B Information</i>								

## Community Contacts

Examiners conducted an interview with a representative from a nonprofit affordable housing organization that develops, finances, and advocates for affordable housing. The contact noted that opportunities for LMI borrowers is strained by the rise in home mortgage rates and increasing housing development costs. The contact stressed the need for affordable housing, particularly for LMI families. The contact suggested that banks could provide affordable mortgages and buyer's assistance programs to generate home ownership. The contact stated that, in addition to programs such as Low-Income Housing Tax Credit, banks should offer additional philanthropic programs that support affordable housing.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 12060 (ATLANTA-SANDY SPRINGS-ALPHARETTA, GA)

### LENDING TEST

Lending performance in the assessment area was considered poor based on poor penetration among individuals of different income levels and among businesses of different sizes and poor geographic distribution of lending. Refer to Appendix B Aggregate Comparison Loan Distribution tables for more details.

### Borrower Distribution of Loans

The distribution of borrowers reflected, given the given the demographics of the assessment area, poor penetration among individuals of different income levels and businesses of different sizes. Overall, home mortgage lending to low- and moderate-income borrowers was poor and lending to businesses with GARs of \$1 million or less was considered reasonable.

#### *Home Mortgage Loans*

The distribution of borrowers reflected, given the demographics, poor penetration among low- and moderate-income borrowers for home mortgage loans.

In 2022, Fieldpoint did not originate any home mortgage loans to low- or moderate-income borrowers, reflecting poor performance. The bank's lending to low-income borrowers was significantly below the

22.0% of low-income families in the assessment area and below the aggregate, which made 4.2% by number and 1.8 % by dollar of home mortgage loans to low-income borrowers. The bank's lending to moderate-income borrowers was significantly below the 13.3% of moderate-income families in the assessment area and significantly below the aggregate, which made 13.1% by number and 7.5% by dollar of home mortgage loans to moderate-income borrowers. The bank's performance to low or moderate-income borrowers in 2021 was similar to 2022 performance.

#### *Small Business Loans*

The distribution of borrowers reflected, given the demographics, poor penetration among small businesses.

In 2022, the bank did not originate any small business loans to businesses with GARs of \$1 million or less. This performance was significantly below the 91.9% of businesses in the assessment with GARs of \$1 million or less. In 2021, the bank originated 2 loans, which represented 100.0% of loans by number and 100.0% by dollar to businesses with GARs of \$1 million or less. The bank's lending to small businesses was above the 91.9% percentage of businesses in the assessment area with GARs of \$1 million or less. The bank did not originate any loans to assessment area businesses in amounts of \$100,000 or less.

### **Geographic Distribution of Loans**

The geographic distribution of loans reflected poor dispersion throughout the assessment area. Lending penetration in LMI census tracts was poor for both home mortgage and small business loans.

#### *Home Mortgage Loans*

The geographic distribution of home mortgage loans reflected poor dispersion throughout the assessment area.

In 2022, Fieldpoint did not originate any home mortgage loans in low- or moderate-income census tracts, which reflected poor performance. The bank's performance in low-income census tracts was below the 5.8% of owner-occupied housing units located in those geographies and below the aggregate, which made 9.1% by number and 5.9 % by dollar of home mortgage loans in low-income census tracts. The bank's performance in moderate-income census tracts was significantly below the 14.1% of owner-occupied housing units located in those geographies and significantly below the aggregate, which made 14.9% by number and 11.0% by dollar of home mortgage loans in moderate-income census tracts. In 2021, the bank's performance in low-and moderate-income census tracts was similar to its 2022 performance.

#### *Small Business Loans*

The geographic distribution of small business loans reflected poor dispersion throughout the assessment area.

In 2022, the bank did not make any small business loans in low- or moderate-income census tracts. The bank's small business lending performance in low-and moderate-income census tracts was below the percentage of business located in those geographies, which were 6.6% and 13.3%, respectively. 2021 performance was better than 2022, as the bank made 50.0% by number and 56.3% by dollar of small business loans in moderate-income census tracts. Fieldpoint's small business lending performance in moderate-income census tracts was significantly above the 13.3% of businesses located in moderate-income census tracts.

***Analysis of Lending Gaps***

Fieldpoint did not originate home mortgage loans in a substantial majority of the census tracts within the assessment area and gaps in penetration were evident in low-and moderate--income census tracts. During the evaluation period, the bank did not originate any loans in low-income census tracts. Other than 2021, the bank did not originate any loans in moderate-income census tracts. In 2021, the bank originated one loan in (2.6%) moderate-income census tracts.

According to the 2022 U.S. Census data, 10.9% of families resided in low-income census tracts and 12.6% of housing units were in low-income census tracts. Notably, 16.1% of families resided in moderate-income census tracts and 16.6% of housing units were in moderate income census tracts. The owner occupancy rate for low-income census tracts was 21.9% and 39.8%, for moderate-income census tracts. The table below details the bank’s penetration of low-, moderate-, middle-, and upper-income census tracts.

<b>MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2021 - December 31, 2022</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2021</b>			
Low	50	50	0%
Moderate	38	37	3%
Middle	22	22	0%
Upper	89	85	4%
Income Unknown	5	5	0%
<b>2022</b>			
Low	44	44	0%
Moderate	51	51	0%
Middle	42	42	0%
Upper	156	152	3%
Income Unknown	34	34	0%

**COMMUNITY DEVELOPMENT TEST**

Fieldpoint’s performance under the Community Development Test in the assessment area demonstrated poor responsiveness to community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s assessment area.

**Community Development Loans**

During the evaluation period, Fieldpoint originated one community development loan in the assessment area. In 2020, the bank provided \$500,000 facility for the construction of a 255-unit residential apartment building located in a low-income tract where units are subsidized by Section 8 housing.

### **Community Development Investments**

During the evaluation period, Fieldpoint extended one qualified grant, but no other investments, that totaled \$2,500 to a nonprofit 501(C) organization located in a low-income census tract. The organization is a shelter and a soup kitchen that provides transitional housing for homeless men.

### **Community Development Services**

During the evaluation period, Fieldpoint provided four instances of community development services. Examples of community development services include the following:

- From 2021 through 2023, one director served as a board member of community service nonprofit that was primarily funded by Medicaid. The organization provided employment counseling, services for disabled people, and job training to LMI individuals.
- In 2023, a vice president served as a business coach at a financial literacy event where the majority of attendees were students from LMI families. Topics covered included basic banking, budgeting, and career counselling.

## STATE OF FLORIDA

### **CRA RATING FOR THE STATE OF FLORIDA: NEEDS TO IMPROVE.**

**The Lending Test is rated: Needs to Improve.**

**The Community Development Test is rated: Needs to Improve.**

The major factors supporting the rating include:

- The distribution of borrowers reflected, given the demographics of the assessment area, poor penetration among individuals of different income levels (including low- and moderate-income) and reasonable among businesses of different sizes.
- The geographic distribution of loans reflected poor dispersion throughout the assessment area.
- The bank's community development performance demonstrated poor responsiveness to community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

### **SCOPE OF EVALUATION**

The evaluation of Fieldpoint's activities in the State of FL consisted of a full scope review of MSA 36740 (Orlando-Kissimmee-Sanford, FL). This assessment area is the only assessment area in FL.

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF FLORIDA**

Fieldpoint's operations in the MSA 36740 (Orlando-Kissimmee-Sanford, FL) assessment area were entirely in Orange County. Specific comments regarding the bank's operations are discussed under the MSA 36740 (Orlando-Kissimmee-Sanford, FL) evaluation.

### **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF FLORIDA**

Conclusions regarding Fieldpoint's performance in FL were solely based on the performance in the MSA 36740 (Orlando-Kissimmee-Sanford, FL) assessment area. Specific comments regarding the Lending and Community Development Tests were discussed under the MSA 36740 (Orlando-Kissimmee-Sanford, FL) Full Scope Review section.

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**METROPOLITAN AREA**  
**MSA 36740 (ORLANDO-KISSIMMEE-SANFORD, FL)**  
**FULL SCOPE REVIEW**

**SCOPE OF EVALUATION**

Examiners conducted a full-scope review of MSA 36740 (Orlando-Kissimmee-Sanford, FL) assessment area, which consisted of the entire Orange County in FL. The products, weighting, and evaluation described in the institution level Scope of Evaluation section are applicable to this assessment area analysis. Fieldpoint's operations in Orange County were limited as this assessment area was effective in November 2022, when the bank opened the Winter Park branch.

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN MSA 36740 (ORLANDO-KISSIMMEE-SANFORD, FL)**

Fieldpoint operated one branch in middle-income census tract in Orange County, which represented 25.0% of the bank's total branches.

The assessment area reflected a highly competitive market for financial services. According to the FDIC Deposit Market Share Report, as of June 30, 2023, 40 institutions operated 261 offices in the assessment area. Of these institutions, Fieldpoint ranked 36<sup>th</sup> by total deposits with less than 0.1% deposit market share. The top five institutions, all large national and regional banks, captured 72.4% of the deposit market share in the assessment area. Fieldpoint's deposit in this assessment area accounted for 1.6% of total deposits. The bank originated one small business loan and did not originate any home mortgage loans in this assessment area. Given the bank's limited operations in this assessment area, the bank's performance received minimal weight when deriving overall conclusions.

**PERFORMANCE CONTEXT**

*Demographic Characteristics*

According to the 2020 U.S. Census data, the population of this assessment area was 1,429,908. The assessment area consisted of 267 census tracts, of which 13 or 4.9% were low-income, 81 or 30.3% were moderate-income, 75 or 28.1% were middle-income, 92 or 34.5% were upper-income, and 6 or 2.3% where the income was unknown.

*Income Characteristics*

Based on the 2020 U.S. Census data, the assessment area had 309,344 families, of which 22.0% were low-income (10.7% of which were below the poverty level), 17.9% were moderate-income, 18.4% were middle-income, and 41.7% were upper-income. The table below depicts the MFIs for the assessment area for 2015 and 2020.

<b>MSA 36740 (Orlando-Kissimmee-Sanford, FL)</b>			
<b>Median Family Income Change</b>			
<b>Area</b>	<b>2015 MFI</b>	<b>2020 MFI</b>	<b>Percent Change</b>
Assessment Area	\$61,673	\$70,209	13.8
MSA 36740 (Orlando-Kissimmee-Sanford, FL)	\$62,609	\$70,774	13.0
State of FL	\$62,828	\$69,670	10.9
<i>Source: 2011 - 2015 U.S. Census ACS 2016 - 2020 U.S. Census ACS MFIs have been inflation-adjusted and are expressed in 2020 dollars.</i>			

### ***Housing Characteristics***

Based on the 2020 U.S. Census data, the assessment area had 545,974 housing units, of which 48.0% were owner-occupied, 37.7% were rental, and 14.3% were vacant. Of the total housing units, 4.6% were located in low-income census tracts, 30.8% in moderate-income census tracts, 26.9% in middle-income census tracts, 36.0% in upper-income census tracts, and 1.7% in census tracts where the income was unknown. In low-income census tracts, 20.2% of housing units were owner-occupied, 56.1% were rental units, and 23.7% were vacant. In moderate-income census tracts, 37.2% of housing units were owner-occupied, 48.1% were rental units, and 14.7% were vacant.

The median age of housing stock in this assessment area was 37 years old, with 3.0% of the stock built before 1950. The median age of housing stock was 43 years in low-income census tracts and 42 years in moderate-income census tracts. According to the 2020 U.S. Census data, the median housing value in this assessment area was \$257,809 with an affordability ratio of 23.8. The median gross rent in the assessment area was \$1,284 per month. Please refer to the table below for more details.

<b>MSA 36740 (Orlando-Kissimmee-Sanford, FL)</b>			
<b>Housing Characteristics</b>			
<b>Geographic Area</b>	<b>2020 Median Housing Value</b>	<b>2020 Affordability Ratio</b>	<b>2020 Median Gross Rent</b>
Assessment Area	\$257,809	23.8	\$1,284
MSA 36740 (Orlando-Kissimmee-Sanford, FL)	\$242,086	25.3	\$1,273
State of FL	\$232,000	24.9	\$1,218
<i>Source: 2020 U.S. Census Bureau ACS.</i>			

### ***Housing Cost Burden***

Housing costs were relatively expensive in this assessment area, which indicated that affordable housing for LMI individuals and families continued to be a challenge. According to HUD's 2015-2019 Comprehensive Housing Affordability Strategy data, within the assessment area, 51.4% of all rental households had rental costs that exceeded 30% of their incomes, 84.5% of low-income rental households had rental costs that exceeded 30% of their income, and 68.9% of moderate-income rental households had rental costs that exceeded 30% of their income.

According to HUD's data, within this assessment area, 24.4% of homeowners had housing costs that exceeded 30% of their incomes, 67.2% of low-income homeowners had housing costs that exceeded 30%

of their income, and 45.4% of moderate-income homeowners had housing costs that exceeded 30% of their income. Please refer to the table below for more details.

<b>MSA 36740 (Orlando-Kissimmee-Sanford, FL)</b>						
<b>Housing Cost Burden*</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
Assessment Area	84.5%	68.9%	51.4%	67.2%	45.4%	24.4%
MSA 36740 (Orlando-Kissimmee-Sanford, FL)	84.0%	67.8%	50.7%	64.2%	41.5%	23.6%
State of FL	80.5%	60.2%	50.5%	61.8%	36.3%	24.1%

*\*Cost Burden is housing cost that equals 30 percent or more of household income  
Source: HUD, 2015-2019 Comprehensive Housing Affordability Strategy*

### ***Labor, Employment and Economic Characteristics***

According to D&B data, there were 103,504 businesses operating in this assessment area in 2022, of which 2.4% were located in low-income census tracts and 28.7% were located in moderate-income census tracts. Of the total businesses operating in the assessment area, 94.0% were small businesses with a GAR of \$1 million or less, of which 2.5% were located in low-income census tracts and 28.4% were located in moderate-income census tracts.

According to the BLS, for the period 2017 to 2019, unemployment rates in the assessment area, and in FL, steadily declined. However, the unemployment rate increased significantly in 2020, due to the COVID-19 pandemic that began in March 2020. In 2021, unemployment rates recovered significantly. Please refer to the table below for more details.

<b>MSA 36740 (Orlando-Kissimmee-Sanford, FL)</b>					
<b>Unemployment Rates</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Assessment Area	3.8%	3.3%	3.0%	11.5%	5.2%
MSA (36740-Orlando-Kissimmee-Sanford, FL)	3.9%	3.4%	3.1%	11.0%	5.1%
State of FL	4.3%	3.7%	3.2%	8.2%	4.6%

*Source: BLS, Local Area Unemployment Statistics*

The table below provides additional performance context information.



<b>MSA 36740 (Orlando-Kissimmee-Sanford, FL)</b>								
<b>Assessment Area Demographics</b>								
<b>Income Categories</b>	<b>Tract Distribution</b>		<b>Families by Tract Income</b>		<b>Families &lt; Poverty Level as % of Families by Tract</b>		<b>Families by Family Income</b>	
	#	%	#	%	#	%	#	%
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<b>Total Assessment Area</b>	<b>327</b>	<b>100.0</b>	<b>229,604</b>	<b>100.0</b>	<b>21,997</b>	<b>9.6</b>	<b>229,604</b>	<b>100.0</b>
	<b>Housing Units by Tract</b>	<b>Housing Types by Tract</b>						
		<b>Owner-Occupied</b>			<b>Rental</b>		<b>Vacant</b>	
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Unknown-income	38,458	11,174	4.9	29.1	22,494	58.5	4,790	12.5
<b>Total Assessment Area</b>	<b>479,696</b>	<b>225,903</b>	<b>100.0</b>	<b>47.1</b>	<b>201,476</b>	<b>42.0</b>	<b>52,317</b>	<b>10.9</b>
	<b>Total Businesses by Tract</b>		<b>Businesses by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	
	#	%	#	%	#	%	#	%
Low-income	5,912	6.6	5,603	6.8	262	4.2	47	4.4
Moderate-income	11,928	13.3	11,066	13.5	745	12.0	117	11.0
Middle-income	10,386	11.6	9,809	11.9	461	7.4	116	10.9
Upper-income	53,518	59.8	48,690	59.2	4,134	66.5	694	65.0
Unknown-income	7,800	8.7	7,090	8.6	616	9.9	94	8.8
<b>Total Assessment Area</b>	<b>89,544</b>	<b>100.0</b>	<b>82,258</b>	<b>100.0</b>	<b>6,218</b>	<b>100.0</b>	<b>1,068</b>	<b>100.0</b>
	<b>Percentage of Total Businesses:</b>			<b>91.9</b>		<b>6.9</b>		<b>1.2</b>
	<b>Total Farms by Tract</b>		<b>Farms by Tract &amp; Revenue Size</b>					
	<b>Tract</b>		<b>Less Than or = \$1 Million</b>		<b>Over \$1 Million</b>		<b>Revenue Not Reported</b>	

	#	%	#	%	#	%	#	%
Low-income	15	4.8	15	4.9	0	0.0	0	0.0
Moderate-income	47	15.0	45	14.7	2	28.6	0	0.0
Middle-income	32	10.2	32	10.4	0	0.0	0	0.0
Upper-income	199	63.4	195	63.5	4	57.1	0	0.0
Unknown-income	21	6.7	20	6.5	1	14.3	0	0.0
<b>Total Assessment Area</b>	<b>314</b>	<b>100.0</b>	<b>307</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>0</b>	<b>.0</b>
	<b>Percentage of Total Farms:</b>			<b>97.8</b>		<b>2.2</b>		<b>.0</b>
<i>2022 FFIEC Census Data and 2022 D&amp;B Data</i>								

## Community Contacts

Examiners conducted an interview with a representative from an affordable housing organization that provides training and technical assistance to individuals in the assessment area. The nonprofit organization supports other community-based partnerships and advocates for policies and programs to improve the quality of affordable housing in Florida. The contact indicated that the housing cost burden is high in the area and current funding provided by the government is not sufficient. The contact stressed the need for affordable housing, particularly for LMI families. The representative indicated that banks have been responsive to the community and there continues to be a need for financial education and financial literacy outreach, particularly in applying for home mortgage loans.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MSA 36740 ORLANDO-KISSIMMEE-SANDFORD, FL

### LENDING TEST

Lending performance in this assessment area was considered poor based on poor penetration among individuals of different income levels and reasonable among businesses of different sizes and poor geographic distribution of lending. Refer to Appendix B Aggregate Comparison Loan Distribution tables for more details.

### Borrower Distribution of Loans

The distribution of borrowers reflected, given the demographics of the assessment area, poor penetration among individuals of different income levels (including low- and moderate income) and reasonable for businesses of different sizes.

#### *Home Mortgage Loans*

The distribution of borrowers reflected, given the demographics of the assessment area, poor penetration among individuals of different income levels, including LMI borrowers.

In 2022, Fieldpoint did not originate any home mortgage loans to low- or moderate-income borrowers, reflecting poor performance. The bank's lending to low-income borrowers was significantly below the

22.0% of low-income families in the assessment area and below the aggregate, which made 4.0% by number and 1.7 % by dollar of home mortgage loans to low-income borrowers. The bank's lending to moderate-income borrowers was significantly below the 17.9 % of moderate-income families in the assessment area and significantly below the aggregate, which made 12.9 % by number and 7.9 % by dollar of home mortgage loans to moderate-income borrowers.

#### *Small Business Lending*

The distribution of borrowers reflected, given the demographics of the assessment area, reasonable penetration among businesses of different sizes.

In 2022, the bank originated one small business loan, which represented 100.0% of loans by number and 100.0% by dollar to businesses with GARs of \$1 million or less. The bank's lending to small businesses was slightly above the 94.0% percentage of businesses in the assessment area with GARs of \$1 million or less.

### **Geographic Distribution of Loans**

The geographic distribution of loans reflected poor dispersion throughout the assessment area. Lending penetration in LMI tracts was poor for home mortgage and for small business.

#### *Home Mortgage Loans*

The geographic distribution of home mortgage loans reflected poor dispersion throughout the assessment area.

In 2022, the bank did not originate any home mortgage or loans in low- or moderate-income census tracts. The bank's performance in low-income census tracts was below the 1.9% of owner-occupied housing units located in those geographies and below the aggregate, which made 1.6 % by number and 2.1 % by dollar of home mortgage loans in those geographies. The bank's performance in moderate-income census tracts was significantly below the 23.8% of owner-occupied housing units located in those geographies and significantly below the aggregate, which made 18.9% by number and 16.9% by dollar of home mortgage loans in those geographies.

#### *Small Business Lending*

The geographic distribution of small business loans reflected poor dispersion throughout the assessment area.

In 2022, the bank did not make any small business loans in low-income or moderate-income census tracts. The bank's small business lending performance in low-and moderate-income census tracts was below the percentage of business located in those geographies, which were 2.4 % and 28.7 %, respectively.

### ***Analysis of Lending Gaps***

Fieldpoint did not originate home mortgage loans in a substantial majority of the census tracts within this assessment area and gaps were reflected in low- and moderate--income census tracts. The bank did not originate any loans in low-income or moderate-income census tracts in 2022.

According to the 2022 U.S. Census data, 3.5% of families resided in low-income census tracts and 4.6% of housing units were in low-income census tracts. In addition, 29.7% of families resided in moderate-income census tracts and 30.8% of housing units were in moderate-income census tracts. The owner occupancy

rate for low-income census tracts was 20.2% and 37.2% for moderate-income census tracts. Please refer to the table below for more details.

<b>MSA 36740 (Orlando-Kissimmee-Sanford, FL)</b>			
<b>Lending Gap Analysis</b>			
<b>January 1, 2022 - December 31, 2022</b>			
<b>Tract Income Levels</b>	<b>Number of Tracts</b>	<b>Tracts with no Loans</b>	<b>Penetration</b>
<b>2022</b>			
Low	13	13	0%
Moderate	81	81	0%
Middle	75	75	0%
Upper	92	91	1%
Income Unknown	6	6	0%

### **COMMUNITY DEVELOPMENT TEST**

Fieldpoint’s performance under the Community Development Test in the assessment area demonstrated poor responsiveness to community development needs of its assessment area through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s assessment area.

#### **Community Development Loans**

The bank did not originate any community development loans in the assessment area.

#### **Community Development Investments**

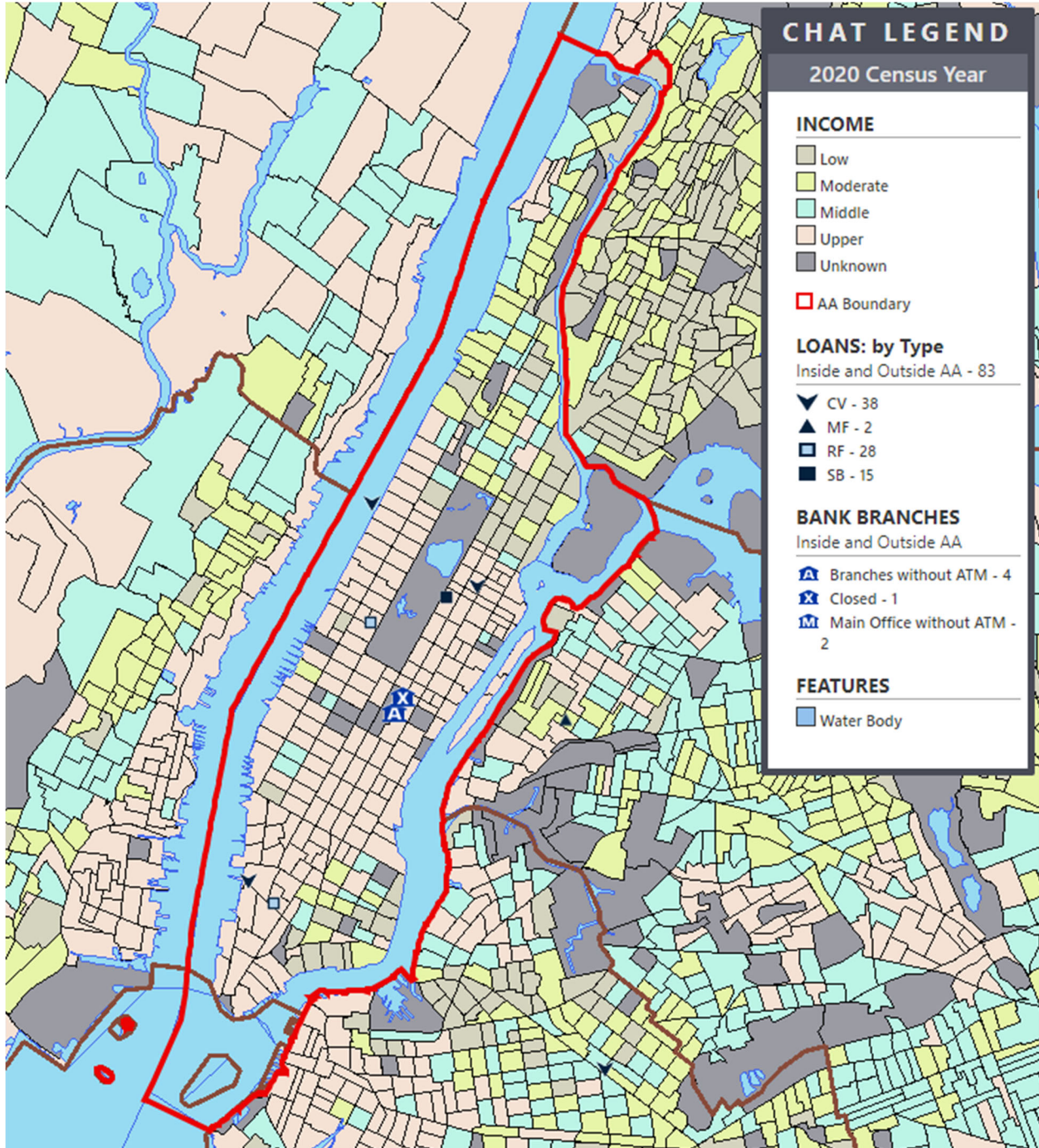
The bank did not make any qualified investments and grants in this assessment area.

#### **Community Development Services**

During the evaluation period, Fieldpoint provided one instance of a community development service. A bank director served as a board member of community service nonprofit organization that provides free services to LMI youths. Services include career counseling and assisting with schoolwork.

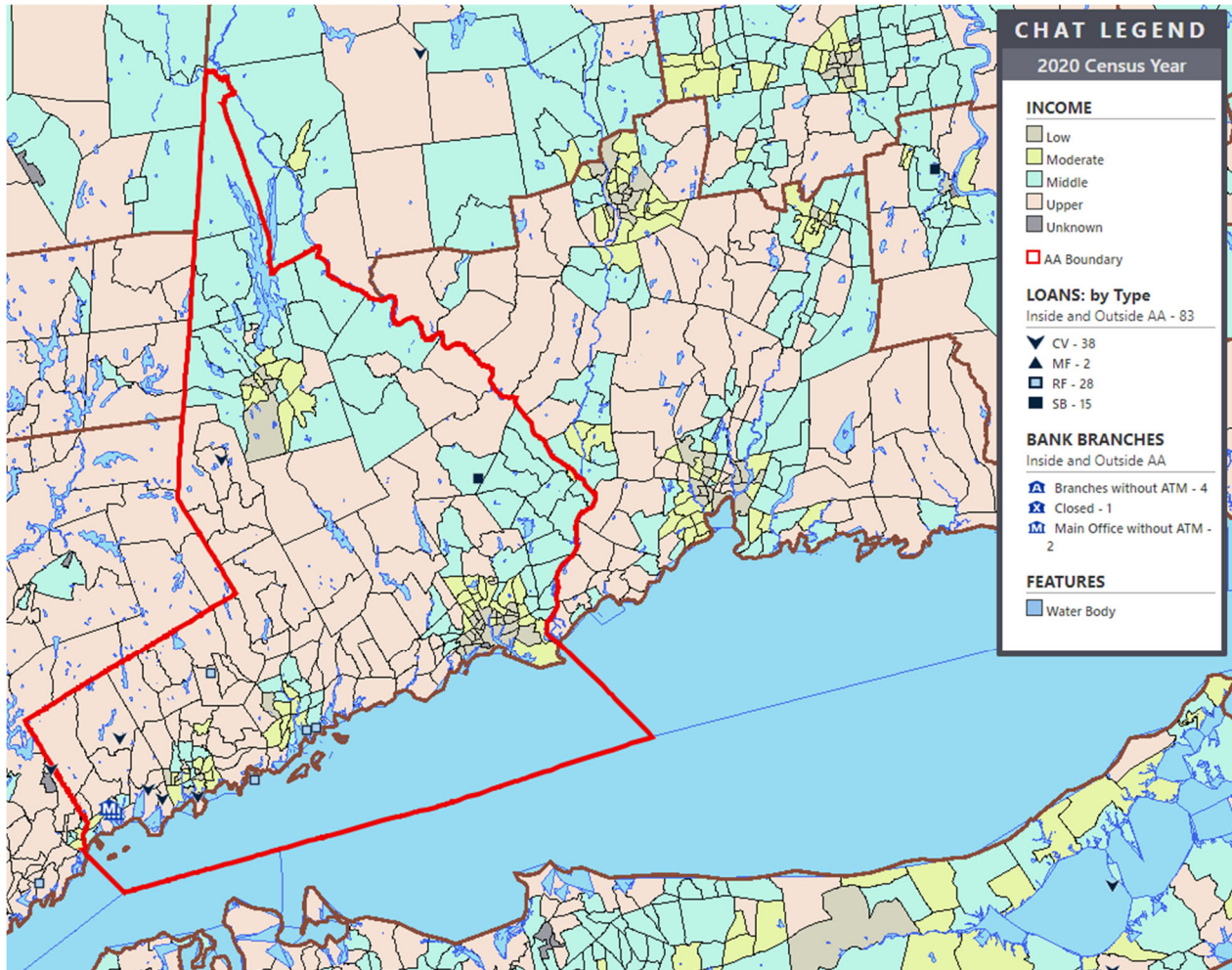
### APPENDIX A –MAPS OF THE ASESSEMENT AREA

MD 35614 (NYC-JC-White Plains, NY-NJ) Assessment Area

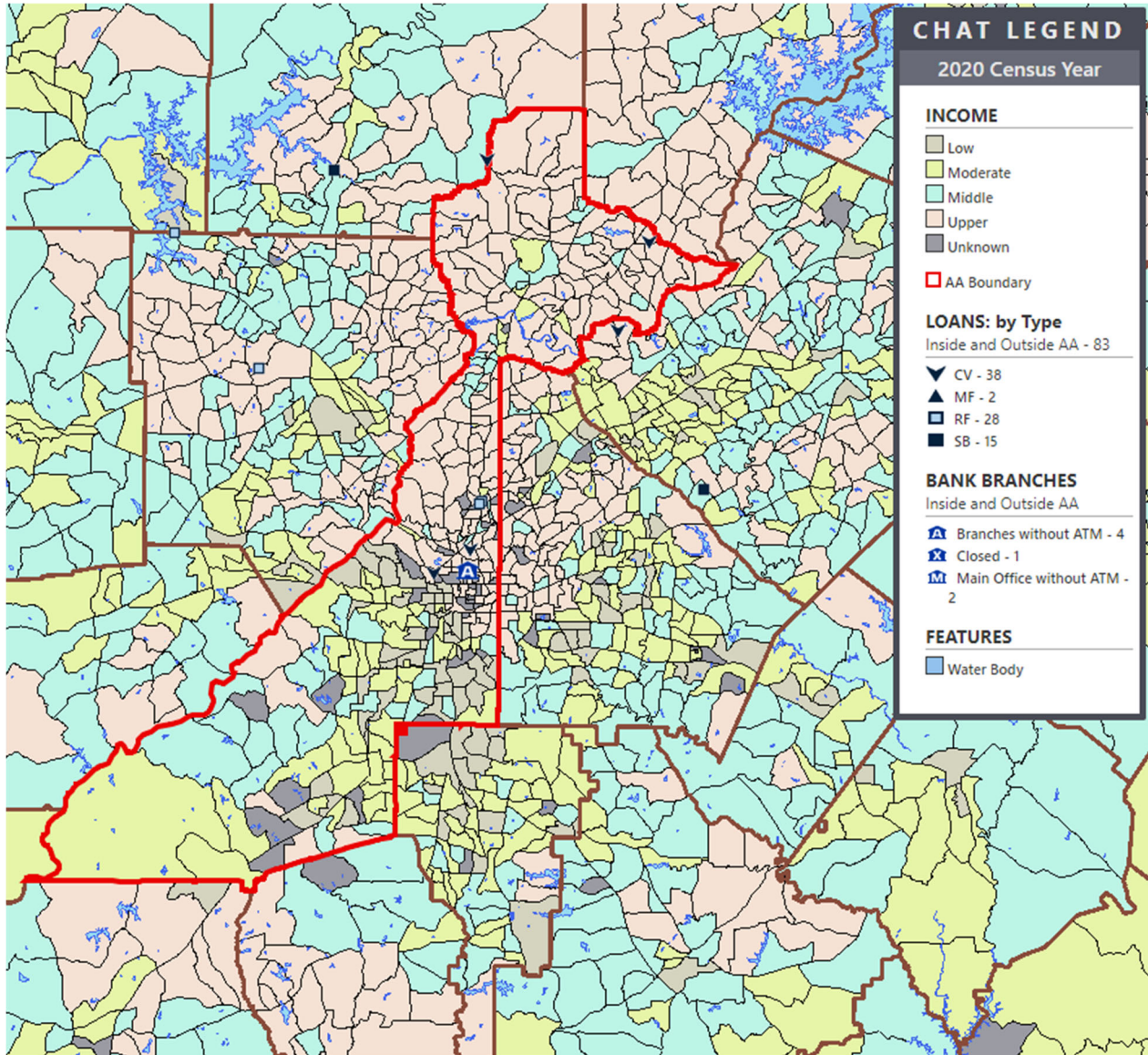




MSA 14860 (Bridgeport-Stamford-Norwalk, CT) Assessment Area

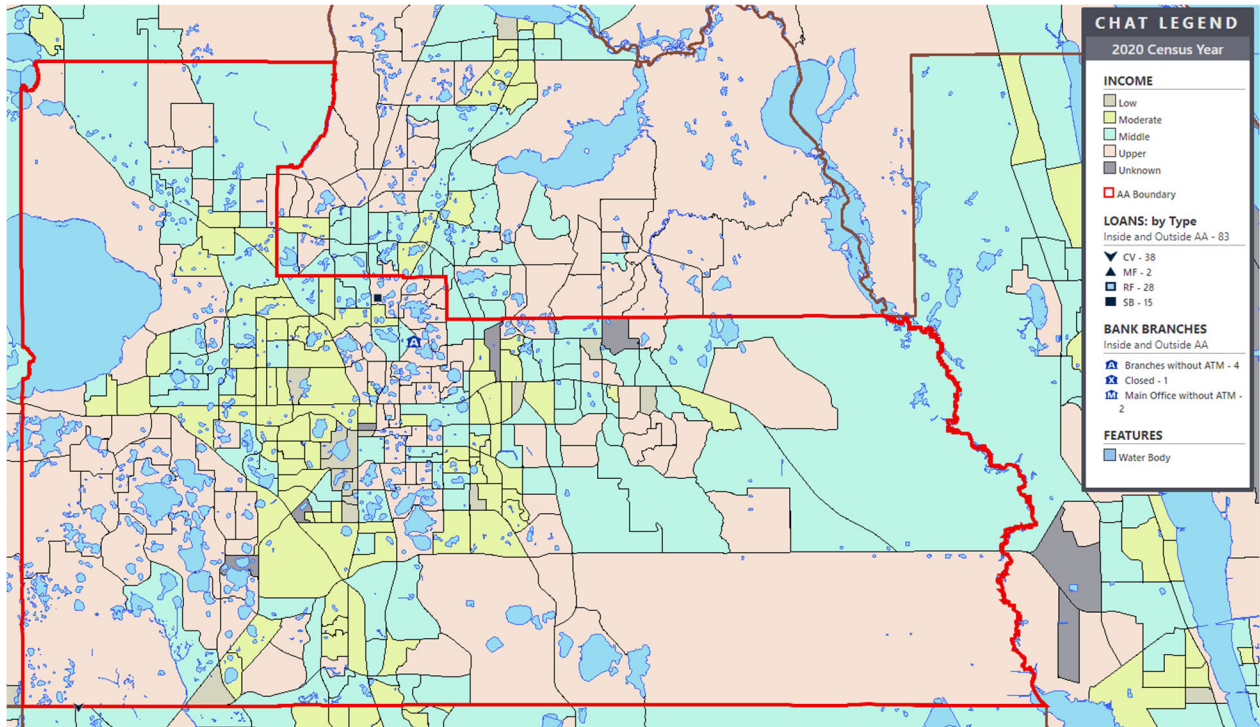


MSA 12060 (ATL-Sandy Springs-Alpharetta, GA) Assessment Area





MSA 36740 (Orlando-Kissimmee-Sanford, FL) Assessment Area





**APPENDIX B - AGGREGATE COMPARISON LOAN DISTRIBUTION TABLES Home Mortgage Lending by Borrower Income Level**

Distribution of 2017 Home Mortgage Lending By Borrower Income Level Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.2	0	0.0	0.0	26.7
Moderate	0	0.0	1.0	0	0.0	0.2	11.5
Middle	0	0.0	5.9	0	0.0	1.6	10.6
Upper	0	0.0	85.1	0	0.0	83.1	51.1
Unknown	0	0.0	7.8	0	0.0	15.1	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.5	0	0.0	0.1	26.7
Moderate	0	0.0	1.6	0	0.0	0.3	11.5
Middle	0	0.0	5.9	0	0.0	1.5	10.6
Upper	2	100.0	84.7	2,815	100.0	86.1	51.1
Unknown	0	0.0	7.3	0	0.0	12.0	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>2,815</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.5	0	0.0	0.3	26.7
Moderate	0	0.0	3.3	0	0.0	0.3	11.5
Middle	0	0.0	9.6	0	0.0	2.4	10.6
Upper	0	0.0	77.1	0	0.0	76.7	51.1
Unknown	0	0.0	8.5	0	0.0	20.3	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	0	0.0	0.3	0	0.0	0.1	26.7
Moderate	0	0.0	1.3	0	0.0	0.2	11.5
Middle	0	0.0	6.1	0	0.0	1.6	10.6
Upper	2	100.0	84.7	2,815	100.0	83.8	51.1
Unknown	0	0.0	7.7	0	0.0	14.4	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>2,815</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2017 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.2	0	0.0	0.1	26.7
Moderate	0	0.0	1.3	0	0.0	0.3	11.5
Middle	0	0.0	5.8	0	0.0	1.7	10.6
Upper	0	0.0	82.8	0	0.0	82.2	51.1
Unknown	0	0.0	9.9	0	0.0	15.7	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.5	0	0.0	0.6	26.7
Moderate	0	0.0	1.7	0	0.0	0.4	11.5
Middle	0	0.0	5.6	0	0.0	1.4	10.6
Upper	1	100.0	79.6	2,090	100.0	77.5	51.1
Unknown	0	0.0	12.5	0	0.0	20.1	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>2,090</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.9	0	0.0	0.5	26.7
Moderate	0	0.0	2.9	0	0.0	0.9	11.5
Middle	0	0.0	5.3	0	0.0	2.3	10.6
Upper	0	0.0	87.5	0	0.0	92.3	51.1
Unknown	0	0.0	3.4	0	0.0	4.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	0	0.0	0.3	0	0.0	0.3	26.7
Moderate	0	0.0	1.5	0	0.0	0.3	11.5
Middle	0	0.0	5.5	0	0.0	1.6	10.6
Upper	1	100.0	79.9	2,090	100.0	78.8	51.1
Unknown	0	0.0	12.7	0	0.0	19.0	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>2,090</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data							
-4-0 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.1	25.2
Moderate	0	0.0	1.1	0	0.0	0.2	0	0.0	1.9	0	0.0	0.5	11.4
Middle	0	0.0	5.8	0	0.0	1.6	0	0.0	6.5	0	0.0	2.0	10.6
Upper	1	100.0	83.8	750	100.0	81.5	0	0.0	83.6	0	0.0	82.5	52.8
Unknown	0	0.0	9.1	0	0.0	16.5	0	0.0	7.9	0	0.0	15.0	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>750</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.4	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	25.2
Moderate	0	0.0	1.1	0	0.0	0.2	0	0.0	0.9	0	0.0	0.3	11.4
Middle	0	0.0	3.3	0	0.0	0.7	0	0.0	4.3	0	0.0	1.2	10.6
Upper	0	0.0	82.8	0	0.0	82.0	0	0.0	87.2	0	0.0	81.4	52.8
Unknown	1	100.0	12.4	4,000	100.0	16.7	3	100.0	7.3	12,388	100.0	16.8	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>4,000</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>12,387</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.2	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	25.2
Moderate	0	0.0	2.6	0	0.0	1.0	0	0.0	0.4	0	0.0	0.1	11.4
Middle	0	0.0	8.3	0	0.0	3.2	0	0.0	9.7	0	0.0	3.0	10.6
Upper	0	0.0	82.0	0	0.0	82.0	0	0.0	86.3	0	0.0	66.4	52.8
Unknown	1	100.0	7.0	1,370	100.0	13.7	0	0.0	3.6	0	0.0	30.5	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>1,370</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0	0.0	0.2	25.2
Moderate	0	0.0	1.1	0	0.0	0.2	0	0.0	1.2	0	0.0	0.4	11.4
Middle	0	0.0	4.7	0	0.0	1.1	0	0.0	5.1	0	0.0	1.4	10.6
Upper	1	33.3	82.6	750	12.3	81.3	0	0.0	85.3	0	0.0	80.4	52.8
Unknown	2	66.7	11.3	5,370	87.7	17.0	3	100.0	8.2	12,388	100.0	17.5	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>6,120</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>12,387</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data													
-4-0 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.1	0	0.0	0.1	0	0.0	0.3	0	0.0	0.2	24.3
Moderate	0	0.0	1.5	0	0.0	0.3	0	0.0	2.1	0	0.0	0.5	11.0
Middle	0	0.0	6.9	0	0.0	2.2	0	0.0	7.0	0	0.0	2.1	11.0
Upper	6	100.0	84.8	10,892	100.0	84.9	3	100.0	82.0	11,651	100.0	81.7	53.6
Unknown	0	0.0	6.7	0	0.0	12.5	0	0.0	8.5	0	0.0	15.5	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>10,892</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>11,651</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.4	0	0.0	0.4	0	0.0	0.7	0	0.0	0.4	24.3
Moderate	0	0.0	1.6	0	0.0	0.5	0	0.0	2.4	0	0.0	0.6	11.0
Middle	0	0.0	6.1	0	0.0	2.0	0	0.0	6.4	0	0.0	1.6	11.0
Upper	3	100.0	85.6	2,600	100.0	84.1	2	100.0	79.5	4,768	100.0	76.1	53.6
Unknown	0	0.0	6.3	0	0.0	12.9	0	0.0	10.9	0	0.0	21.3	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>2,600</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>4,768</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.4	0	0.0	0.5	0	0.0	1.0	0	0.0	0.1	24.3
Moderate	0	0.0	2.9	0	0.0	0.6	0	0.0	3.8	0	0.0	1.2	11.0
Middle	0	0.0	9.1	0	0.0	2.8	0	0.0	8.6	0	0.0	3.8	11.0
Upper	0	0.0	82.2	0	0.0	71.9	0	0.0	79.4	0	0.0	76.4	53.6
Unknown	0	0.0	5.4	0	0.0	24.2	0	0.0	7.3	0	0.0	18.5	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	0.3	0	0.0	0.3	0	0.0	0.5	0	0.0	0.3	24.3
Moderate	0	0.0	1.5	0	0.0	0.4	0	0.0	2.2	0	0.0	0.5	11.0
Middle	0	0.0	6.5	0	0.0	2.0	0	0.0	6.6	0	0.0	1.8	11.0
Upper	9	100.0	84.9	13,492	100.0	83.1	5	100.0	80.9	16,419	100.0	78.1	53.6
Unknown	0	0.0	6.8	0	0.0	14.2	0	0.0	9.8	0	0.0	19.3	0.0
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>13,492</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>16,419</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2017 Home Mortgage Lending By Borrower Income Level Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	2.8	0	0.0	0.8	20.2
Moderate	0	0.0	13.1	0	0.0	5.4	13.5
Middle	0	0.0	16.5	0	0.0	8.9	15.4
Upper	4	57.1	60.4	6,550	38.6	77.0	50.9
Unknown	3	42.9	7.2	10,436	61.4	7.9	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>16,986</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	4.2	0	0.0	1.2	20.2
Moderate	0	0.0	9.8	0	0.0	3.7	13.5
Middle	0	0.0	13.6	0	0.0	6.8	15.4
Upper	4	66.7	63.2	4,965	67.4	77.9	50.9
Unknown	2	33.3	9.2	2,400	32.6	10.3	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>7,365</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	2.7	0	0.0	0.5	20.2
Moderate	0	0.0	10.9	0	0.0	2.9	13.5
Middle	0	0.0	17.1	0	0.0	8.1	15.4
Upper	0	0.0	65.3	0	0.0	81.6	50.9
Unknown	0	0.0	4.0	0	0.0	6.9	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	0	0.0	3.4	0	0.0	0.9	20.2
Moderate	0	0.0	11.7	0	0.0	4.6	13.5
Middle	0	0.0	15.4	0	0.0	8.0	15.4
Upper	8	61.5	61.7	11,515	47.3	77.5	50.9
Unknown	5	38.5	7.8	12,836	52.7	8.8	0.0
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>24,351</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<p>Source: 2017 FFIEC Census Data 2011-2015 U.S. Census Bureau: American Community Survey</p> <p>Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.</p>							

Distribution of 2018 Home Mortgage Lending By Borrower Income Level Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	2.9	0	0.0	1.0	20.2
Moderate	0	0.0	12.4	0	0.0	5.4	13.5
Middle	0	0.0	16.9	0	0.0	9.7	15.4
Upper	5	62.5	57.9	8,893	33.9	73.7	50.9
Unknown	3	37.5	9.9	17,358	66.1	10.2	0.0
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>26,251</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	4.3	0	0.0	1.6	20.2
Moderate	0	0.0	9.7	0	0.0	4.1	13.5
Middle	0	0.0	15.2	0	0.0	8.4	15.4
Upper	3	60.0	61.5	3,008	40.2	75.6	50.9
Unknown	2	40.0	9.3	4,480	59.8	10.3	0.0
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>7,488</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	2.3	0	0.0	1.1	20.2
Moderate	0	0.0	6.3	0	0.0	3.4	13.5
Middle	0	0.0	11.6	0	0.0	5.9	15.4
Upper	0	0.0	74.5	0	0.0	81.5	50.9
Unknown	0	0.0	5.3	0	0.0	8.2	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	0	0.0	3.3	0	0.0	1.2	20.2
Moderate	0	0.0	10.7	0	0.0	4.7	13.5
Middle	0	0.0	15.6	0	0.0	8.9	15.4
Upper	8	61.5	59.8	11,901	35.3	73.5	50.9
Unknown	5	38.5	10.6	21,838	64.7	11.6	0.0
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>33,739</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data -4-0 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding. Multifamily loans are not included in the borrower distribution analysis.							

Distribution of 2019 and 2020 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	4.0	0	0.0	1.4	0	0.0	3.2	0	0.0	0.9	20.2
Moderate	0	0.0	15.6	0	0.0	7.5	0	0.0	12.1	0	0.0	5.4	13.5
Middle	0	0.0	15.8	0	0.0	10.2	0	0.0	15.7	0	0.0	8.8	15.4
Upper	1	25.0	55.9	1,500	14.3	70.7	1	33.3	61.2	1,670	48.8	76.0	50.9
Unknown	3	75.0	8.8	9,015	85.7	10.3	2	66.7	7.8	1,750	51.2	8.9	0.0
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>10,515</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>3,420</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	3.5	0	0.0	1.3	0	0.0	2.2	0	0.0	0.9	20.2
Moderate	0	0.0	9.4	0	0.0	3.5	0	0.0	9.6	0	0.0	4.5	13.5
Middle	0	0.0	13.3	0	0.0	6.5	1	20.0	16.5	420	8.3	9.6	15.4
Upper	0	0.0	62.0	0	0.0	74.5	2	40.0	63.6	2,352	46.4	74.9	50.9
Unknown	1	100.0	11.9	6,500	100.0	14.2	2	40.0	8.2	2,303	45.4	10.0	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>6,500</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>5,074</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.4	0	0.0	1.5	0	0.0	2.4	0	0.0	1.9	20.2
Moderate	0	0.0	8.9	0	0.0	4.7	0	0.0	6.0	0	0.0	3.6	13.5
Middle	0	0.0	15.7	0	0.0	9.4	0	0.0	13.4	0	0.0	8.3	15.4
Upper	0	0.0	69.7	0	0.0	80.2	0	0.0	74.8	0	0.0	82.7	50.9
Unknown	0	0.0	3.3	0	0.0	4.1	0	0.0	3.3	0	0.0	3.5	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	3.6	0	0.0	1.3	0	0.0	2.5	0	0.0	0.9	20.2
Moderate	0	0.0	11.8	0	0.0	5.1	0	0.0	10.2	0	0.0	4.8	13.5
Middle	0	0.0	14.3	0	0.0	8.0	1	12.5	15.7	420	4.9	9.0	15.4
Upper	1	20.0	58.7	1,500	8.8	72.2	3	37.5	62.6	4,022	47.4	74.9	50.9
Unknown	4	80.0	11.5	15,515	91.2	13.4	4	50.0	9.0	4,053	47.7	10.4	0.0
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>17,015</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>8,494</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2020 FFIEC Census Data													
-4-0 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	7.4	0	0.0	2.8	0	0.0	8.3	0	0.0	2.9	25.1
Moderate	0	0.0	22.0	0	0.0	11.9	0	0.0	20.6	0	0.0	11.3	15.1
Middle	0	0.0	18.4	0	0.0	12.7	0	0.0	17.3	0	0.0	12.0	17.7
Upper	0	0.0	40.7	0	0.0	62.0	4	80.0	39.3	9,402	82.5	60.6	42.0
Unknown	3	100.0	11.4	4,377	100.0	10.7	1	20.0	14.5	2,000	17.5	13.1	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>4,377</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>11,402</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	5.4	0	0.0	2.3	0	0.0	10.4	0	0.0	4.3	25.1
Moderate	0	0.0	15.6	0	0.0	8.5	0	0.0	18.4	0	0.0	9.4	15.1
Middle	0	0.0	20.1	0	0.0	13.6	0	0.0	19.2	0	0.0	12.3	17.7
Upper	9	90.0	46.7	10,775	65.5	63.4	4	100.0	41.6	3,150	100.0	60.6	42.0
Unknown	1	10.0	12.1	5,680	34.5	12.1	0	0.0	10.5	0	0.0	13.3	0.0
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>16,455</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>3,150</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	3.5	0	0.0	1.6	0	0.0	4.8	0	0.0	2.3	25.1
Moderate	0	0.0	9.7	0	0.0	5.7	0	0.0	12.8	0	0.0	6.6	15.1
Middle	0	0.0	17.4	0	0.0	11.6	0	0.0	20.0	0	0.0	12.9	17.7
Upper	0	0.0	65.9	0	0.0	74.5	0	0.0	60.2	0	0.0	75.9	42.0
Unknown	0	0.0	3.5	0	0.0	6.7	0	0.0	2.2	0	0.0	2.3	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	6.0	0	0.0	2.4	0	0.0	8.4	0	0.0	3.3	25.1
Moderate	1	5.0	17.5	75	0.3	9.8	0	0.0	18.6	0	0.0	10.1	15.1
Middle	0	0.0	19.1	0	0.0	12.9	0	0.0	18.1	0	0.0	11.8	17.7
Upper	12	60.0	45.4	12,005	46.1	63.0	8	88.9	42.6	12,552	86.3	61.3	42.0
Unknown	7	35.0	11.9	13,938	53.6	11.9	1	11.1	12.3	2,000	13.7	13.5	0.0
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>26,018</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>14,552</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													



Distribution of 2021 and 2022 Home Mortgage Lending By Borrower Income Level													
Assessment Area: MSA 12060 ATL-Sandy Springs-Alpharetta, GA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	3.2	0	0.0	1.4	0	0.0	2.4	0	0.0	1.1	22.0
Moderate	0	0.0	13.6	0	0.0	7.6	0	0.0	12.6	0	0.0	7.0	13.3
Middle	0	0.0	17.0	0	0.0	12.4	0	0.0	16.7	0	0.0	12.1	15.5
Upper	0	0.0	48.2	0	0.0	61.9	3	100.0	47.5	2,299	100.0	60.9	49.2
Unknown	2	100.0	17.9	3,124	100.0	16.7	0	0.0	20.7	0	0.0	19.0	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>3,123</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>2,299</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	3.7	0	0.0	1.6	0	0.0	8.2	0	0.0	3.9	22.0
Moderate	0	0.0	10.0	0	0.0	5.5	0	0.0	16.5	0	0.0	10.2	13.3
Middle	0	0.0	15.5	0	0.0	11.0	0	0.0	19.0	0	0.0	14.6	15.5
Upper	0	0.0	52.4	0	0.0	64.1	2	100.0	39.9	1,227	100.0	55.3	49.2
Unknown	0	0.0	18.4	0	0.0	17.8	0	0.0	16.4	0	0.0	16.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>1,227</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	3.5	0	0.0	1.8	0	0.0	3.4	0	0.0	1.5	22.0
Moderate	0	0.0	6.8	0	0.0	3.6	0	0.0	9.0	0	0.0	5.0	13.3
Middle	0	0.0	13.4	0	0.0	9.6	0	0.0	14.8	0	0.0	8.8	15.5
Upper	0	0.0	72.4	0	0.0	81.1	0	0.0	68.9	0	0.0	80.4	49.2
Unknown	0	0.0	3.9	0	0.0	3.9	0	0.0	3.9	0	0.0	4.3	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	3.4	0	0.0	1.5	0	0.0	4.2	0	0.0	1.8	22.0
Moderate	0	0.0	11.3	0	0.0	6.4	0	0.0	13.1	0	0.0	7.5	13.3
Middle	0	0.0	15.9	0	0.0	11.5	0	0.0	16.9	0	0.0	12.3	15.5
Upper	0	0.0	51.5	0	0.0	63.5	5	100.0	47.6	3,526	100.0	60.5	49.2
Unknown	3	100.0	17.9	17,124	100.0	17.1	0	0.0	18.2	0	0.0	17.8	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>17,123</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>3,526</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Distribution of 2022 Home Mortgage Lending By Borrower Income Level							
Assessment Area: MSA 36740 Orlando-Kissimmee-Sanford, FL							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
<b>Home Purchase Loans</b>							
Low	0	0.0	2.2	0	0.0	0.9	22.0
Moderate	0	0.0	10.8	0	0.0	6.3	17.9
Middle	0	0.0	19.4	0	0.0	15.2	18.4
Upper	0	0.0	49.3	0	0.0	60.7	41.7
Unknown	0	0.0	18.3	0	0.0	17.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	7.1	0	0.0	3.6	22.0
Moderate	0	0.0	17.9	0	0.0	12.3	17.9
Middle	0	0.0	21.9	0	0.0	18.9	18.4
Upper	0	0.0	40.2	0	0.0	51.6	41.7
Unknown	0	0.0	12.8	0	0.0	13.5	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	3.8	0	0.0	2.1	22.0
Moderate	0	0.0	11.0	0	0.0	6.6	17.9
Middle	0	0.0	18.7	0	0.0	13.5	18.4
Upper	0	0.0	63.5	0	0.0	75.1	41.7
Unknown	0	0.0	3.0	0	0.0	2.7	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	0	0.0	4.0	0	0.0	1.7	22.0
Moderate	0	0.0	12.9	0	0.0	7.9	17.9
Middle	0	0.0	20.0	0	0.0	16.0	18.4
Upper	0	0.0	47.9	0	0.0	58.7	41.7
Unknown	0	0.0	15.2	0	0.0	15.7	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

**Home Mortgage Lending by Income Level of Geography**

Distribution of 2017 Home Mortgage Lending By Income Level of Geography Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	2.5	0	0.0	1.6	3.0
Moderate	0	0.0	7.6	0	0.0	3.8	6.8
Middle	0	0.0	4.6	0	0.0	3.3	5.1
Upper	0	0.0	84.5	0	0.0	90.5	84.0
Unknown	0	0.0	0.9	0	0.0	0.8	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	2.9	0	0.0	1.8	3.0
Moderate	0	0.0	6.9	0	0.0	3.5	6.8
Middle	0	0.0	5.2	0	0.0	3.0	5.1
Upper	2	100.0	84.3	2,815	100.0	91.1	84.0
Unknown	0	0.0	0.7	0	0.0	0.6	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>2,815</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	4.6	0	0.0	1.6	3.0
Moderate	0	0.0	9.4	0	0.0	6.3	6.8
Middle	0	0.0	5.0	0	0.0	2.7	5.1
Upper	0	0.0	80.6	0	0.0	89.2	84.0
Unknown	0	0.0	0.4	0	0.0	0.1	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							
Low	0	0.0	12.6	0	0.0	14.1	13.5
Moderate	0	0.0	15.2	0	0.0	9.5	14.6
Middle	0	0.0	8.5	0	0.0	14.1	6.4
Upper	0	0.0	62.6	0	0.0	60.0	64.5
Unknown	0	0.0	1.1	0	0.0	2.3	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	0	0.0	3.1	0	0.0	5.2	3.0
Moderate	0	0.0	7.8	0	0.0	5.5	6.8
Middle	0	0.0	5.0	0	0.0	6.3	5.1
Upper	2	100.0	83.2	2,815	100.0	81.8	84.0
Unknown	0	0.0	0.8	0	0.0	1.2	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>2,815</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2017 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 Home Mortgage Lending By Income Level of Geography Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	2.9	0	0.0	2.2	3.0
Moderate	0	0.0	8.1	0	0.0	4.7	6.8
Middle	0	0.0	5.3	0	0.0	3.8	5.1
Upper	0	0.0	82.7	0	0.0	88.3	84.0
Unknown	0	0.0	1.0	0	0.0	1.0	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	3.1	0	0.0	2.7	3.0
Moderate	0	0.0	8.0	0	0.0	5.0	6.8
Middle	0	0.0	4.6	0	0.0	2.7	5.1
Upper	1	100.0	83.7	2,090	100.0	88.7	84.0
Unknown	0	0.0	0.5	0	0.0	0.8	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>2,090</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	4.7	0	0.0	3.6	3.0
Moderate	0	0.0	8.3	0	0.0	4.5	6.8
Middle	0	0.0	3.4	0	0.0	2.3	5.1
Upper	0	0.0	82.6	0	0.0	89.3	84.0
Unknown	0	0.0	0.9	0	0.0	0.3	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	11.3	0	0.0	10.9	13.5
Moderate	0	0.0	19.5	0	0.0	13.3	14.6
Middle	0	0.0	8.9	0	0.0	10.3	6.4
Upper	0	0.0	59.6	0	0.0	63.8	64.5
Unknown	0	0.0	0.7	0	0.0	1.7	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	3.9	0	0.0	6.6	3.0
Moderate	0	0.0	9.2	0	0.0	8.9	6.8
Middle	0	0.0	5.3	0	0.0	6.8	5.1
Upper	1	100.0	80.8	2,090	100.0	76.4	84.0
Unknown	0	0.0	0.8	0	0.0	1.3	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>2,090</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2018 FFIEC Census Data

4-0 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	3.3	0	0.0	2.7	0	0.0	3.1	0	0.0	1.9	2.1
Moderate	0	0.0	7.6	0	0.0	4.5	0	0.0	7.0	0	0.0	4.2	6.8
Middle	0	0.0	4.9	0	0.0	3.0	0	0.0	4.6	0	0.0	3.1	5.4
Upper	1	100.0	83.3	750	100.0	89.2	0	0.0	84.2	0	0.0	90.1	84.7
Unknown	0	0.0	0.9	0	0.0	0.6	0	0.0	1.1	0	0.0	0.6	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>750</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	1.6	0	0.0	1.1	0	0.0	1.8	0	0.0	1.6	2.1
Moderate	1	100.0	5.8	4,000	100.0	2.8	0	0.0	6.0	0	0.0	3.6	6.8
Middle	0	0.0	3.7	0	0.0	2.2	0	0.0	4.4	0	0.0	2.7	5.4
Upper	0	0.0	88.0	0	0.0	93.4	3	100.0	86.9	12,388	100.0	91.6	84.7
Unknown	0	0.0	0.9	0	0.0	0.5	0	0.0	0.9	0	0.0	0.5	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>4,000</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>12,387</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.4	0	0.0	1.5	0	0.0	2.5	0	0.0	1.3	2.1
Moderate	1	100.0	7.8	1,370	100.0	5.5	0	0.0	8.6	0	0.0	3.2	6.8
Middle	0	0.0	7.2	0	0.0	4.8	0	0.0	4.3	0	0.0	1.3	5.4
Upper	0	0.0	82.6	0	0.0	88.2	0	0.0	84.2	0	0.0	94.2	84.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.4	0	0.0	0.0	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>1,370</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	8.2	0	0.0	7.8	0	0.0	5.4	0	0.0	7.1	10.1
Moderate	0	0.0	20.8	0	0.0	16.4	0	0.0	22.9	0	0.0	17.1	16.7
Middle	2	100.0	8.0	2,425	100.0	9.6	0	0.0	7.9	0	0.0	6.0	6.6
Upper	0	0.0	62.1	0	0.0	63.6	0	0.0	62.7	0	0.0	68.9	65.6
Unknown	0	0.0	0.8	0	0.0	2.7	0	0.0	1.1	0	0.0	0.9	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>2,425</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	3.0	0	0.0	4.3	0	0.0	2.4	0	0.0	3.5	2.1
Moderate	2	40.0	7.9	5,370	62.8	8.9	0	0.0	7.3	0	0.0	8.3	6.8
Middle	2	40.0	4.7	2,425	28.4	5.5	0	0.0	4.7	0	0.0	3.9	5.4
Upper	1	20.0	83.7	750	8.8	79.8	3	100.0	84.6	12,388	100.0	83.6	84.7
Unknown	0	0.0	0.8	0	0.0	1.5	0	0.0	0.9	0	0.0	0.7	1.1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>8,545</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>12,387</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020 FFIEC Census Data

4-0 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 and 2022 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	2.2	0	0.0	1.6	0	0.0	3.3	0	0.0	2.4	2.7
Moderate	0	0.0	5.9	0	0.0	4.0	0	0.0	4.9	0	0.0	3.5	6.3
Middle	0	0.0	4.3	0	0.0	3.1	0	0.0	7.2	0	0.0	4.3	7.4
Upper	6	100.0	86.7	10,892	100.0	90.9	3	100.0	82.0	11,651	100.0	87.9	82.2
Unknown	0	0.0	0.8	0	0.0	0.4	0	0.0	2.7	0	0.0	2.0	1.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>10,892</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>11,651</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	2.1	0	0.0	1.6	0	0.0	2.5	0	0.0	1.4	2.7
Moderate	0	0.0	7.5	0	0.0	4.5	0	0.0	4.4	0	0.0	2.3	6.3
Middle	0	0.0	4.6	0	0.0	3.3	0	0.0	7.1	0	0.0	3.8	7.4
Upper	3	100.0	85.0	2,600	100.0	90.1	2	100.0	84.0	4,768	100.0	91.2	82.2
Unknown	0	0.0	0.8	0	0.0	0.5	0	0.0	1.9	0	0.0	1.4	1.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>2,600</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>4,768</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	4.1	0	0.0	2.9	0	0.0	2.2	0	0.0	1.0	2.7
Moderate	0	0.0	7.1	0	0.0	3.1	0	0.0	5.7	0	0.0	4.5	6.3
Middle	0	0.0	6.6	0	0.0	2.8	0	0.0	7.6	0	0.0	5.4	7.4
Upper	0	0.0	81.7	0	0.0	90.9	0	0.0	81.9	0	0.0	87.6	82.2
Unknown	0	0.0	0.4	0	0.0	0.3	0	0.0	2.5	0	0.0	1.5	1.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	6.9	0	0.0	12.9	0	0.0	6.6	0	0.0	4.9	11.4
Moderate	0	0.0	21.0	0	0.0	21.6	0	0.0	15.7	0	0.0	13.3	13.8
Middle	0	0.0	6.3	0	0.0	8.7	0	0.0	10.2	0	0.0	8.0	9.2
Upper	0	0.0	65.4	0	0.0	56.5	0	0.0	64.4	0	0.0	70.9	63.0
Unknown	0	0.0	0.4	0	0.0	0.3	0	0.0	3.0	0	0.0	2.8	2.6
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	2.4	0	0.0	4.2	0	0.0	3.3	0	0.0	2.9	2.7
Moderate	0	0.0	7.2	0	0.0	8.1	0	0.0	5.4	0	0.0	6.2	6.3
Middle	0	0.0	4.5	0	0.0	4.3	0	0.0	7.2	0	0.0	5.1	7.4
Upper	9	100.0	85.1	13,492	100.0	83.0	5	100.0	81.7	16,419	100.0	83.8	82.2
Unknown	0	0.0	0.8	0	0.0	0.4	0	0.0	2.5	0	0.0	2.0	1.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>13,492</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>16,419</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
2016-2020 U.S. Census Bureau: American Community Survey													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Distribution of 2017 Home Mortgage Lending By Income Level of Geography Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	1	14.3	2.7	315	1.9	1.1	2.5
Moderate	0	0.0	14.1	0	0.0	6.9	12.1
Middle	0	0.0	26.7	0	0.0	17.0	24.3
Upper	6	85.7	56.6	16,671	98.1	75.0	61.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>16,986</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	2.4	0	0.0	0.8	2.5
Moderate	0	0.0	10.8	0	0.0	4.5	12.1
Middle	0	0.0	22.1	0	0.0	13.6	24.3
Upper	6	100.0	64.7	7,365	100.0	81.1	61.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>7,365</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	2.7	0	0.0	0.9	2.5
Moderate	0	0.0	8.9	0	0.0	3.5	12.1
Middle	0	0.0	25.0	0	0.0	13.8	24.3
Upper	0	0.0	63.4	0	0.0	81.8	61.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	15.6	0	0.0	14.4	12.8
Moderate	0	0.0	48.9	0	0.0	64.7	32.3
Middle	0	0.0	22.2	0	0.0	4.5	43.0
Upper	0	0.0	13.3	0	0.0	16.5	11.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	1	7.7	2.6	315	1.3	1.8	2.5
Moderate	0	0.0	12.8	0	0.0	9.2	12.1
Middle	0	0.0	24.8	0	0.0	14.9	24.3
Upper	12	92.3	59.8	24,036	98.7	74.2	61.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>24,351</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2017 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 Home Mortgage Lending By Income Level of Geography Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	3.1	0	0.0	1.4	2.5
Moderate	1	12.5	12.4	133	0.5	6.3	12.1
Middle	0	0.0	27.4	0	0.0	17.3	24.3
Upper	7	87.5	57.1	26,118	99.5	75.0	61.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>26,251</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	1.7	0	0.0	0.8	2.5
Moderate	1	20.0	8.7	480	6.4	4.3	12.1
Middle	3	60.0	21.8	5,920	79.1	13.6	24.3
Upper	1	20.0	67.8	1,088	14.5	81.4	61.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>7,488</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.8	0	0.0	0.3	2.5
Moderate	0	0.0	6.9	0	0.0	4.2	12.1
Middle	0	0.0	20.2	0	0.0	13.5	24.3
Upper	0	0.0	72.1	0	0.0	81.9	61.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	1	100.0	15.4	2,080	100.0	22.5	12.8
Moderate	0	0.0	38.5	0	0.0	14.8	32.3
Middle	0	0.0	30.8	0	0.0	50.9	43.0
Upper	0	0.0	15.4	0	0.0	11.9	11.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>2,080</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	1	7.1	2.4	2,080	5.8	3.0	2.5
Moderate	2	14.3	10.7	613	1.7	6.3	12.1
Middle	3	21.4	24.5	5,920	16.5	19.0	24.3
Upper	8	57.1	62.4	27,206	76.0	71.7	61.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>35,819</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2018 FFIEC Census Data							
-4-0 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



Distribution of 2019 and 2020 Home Mortgage Lending By Income Level of Geography Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2019						2020						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	0	0.0	3.2	0	0.0	1.4	0	0.0	2.4	0	0.0	1.0	2.5
Moderate	0	0.0	12.8	0	0.0	7.1	0	0.0	10.7	0	0.0	5.1	12.1
Middle	0	0.0	26.9	0	0.0	18.4	1	33.3	22.9	1,670	48.8	15.1	24.3
Upper	4	100.0	57.1	10,515	100.0	73.1	2	66.7	64.0	1,750	51.2	78.9	61.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>10,515</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>3,420</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	1.8	0	0.0	0.7	2	40.0	1.6	2,303	45.4	0.7	2.5
Moderate	0	0.0	8.7	0	0.0	3.7	0	0.0	8.3	0	0.0	4.4	12.1
Middle	0	0.0	18.8	0	0.0	11.2	0	0.0	23.0	0	0.0	15.1	24.3
Upper	1	100.0	70.7	6,500	100.0	84.4	3	60.0	67.1	2,772	54.6	79.8	61.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>6,500</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>5,074</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.3	0	0.0	1.3	0	0.0	0.4	0	0.0	0.1	2.5
Moderate	0	0.0	8.2	0	0.0	6.0	0	0.0	5.8	0	0.0	3.1	12.1
Middle	0	0.0	20.1	0	0.0	15.0	0	0.0	17.6	0	0.0	14.1	24.3
Upper	0	0.0	70.4	0	0.0	77.7	0	0.0	76.2	0	0.0	82.7	61.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	20.8	0	0.0	25.5	0	0.0	20.8	0	0.0	13.7	12.8
Moderate	0	0.0	49.1	0	0.0	20.4	0	0.0	43.8	0	0.0	49.3	32.3
Middle	0	0.0	20.8	0	0.0	26.1	0	0.0	22.9	0	0.0	20.9	43.0
Upper	0	0.0	9.4	0	0.0	28.0	0	0.0	12.5	0	0.0	16.2	11.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	2.5	0	0.0	2.1	2	25.0	2.0	2,303	27.1	1.1	2.5
Moderate	0	0.0	10.7	0	0.0	5.9	0	0.0	9.3	0	0.0	5.5	12.1
Middle	0	0.0	22.5	0	0.0	14.8	1	12.5	22.5	1,670	19.7	14.9	24.3
Upper	5	100.0	64.3	17,015	100.0	77.2	5	62.5	66.2	4,522	53.2	78.6	61.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>17,015</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>8,494</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020 FFIEC Census Data

-4-0 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 and 2022 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	1	33.3	6.0	1,163	26.6	2.9	0	0.0	7.1	0	0.0	3.8	5.6
Moderate	0	0.0	19.2	0	0.0	10.2	0	0.0	21.0	0	0.0	11.5	17.1
Middle	0	0.0	32.5	0	0.0	22.8	0	0.0	31.6	0	0.0	22.1	33.8
Upper	2	66.7	42.3	3,215	73.4	64.2	5	100.0	40.2	11,402	100.0	62.6	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>4,377</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>11,402</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	2.9	0	0.0	1.4	0	0.0	5.1	0	0.0	2.4	5.6
Moderate	0	0.0	12.2	0	0.0	6.7	0	0.0	14.9	0	0.0	7.7	17.1
Middle	2	20.0	32.9	3,312	20.1	22.6	2	50.0	30.2	650	20.6	18.7	33.8
Upper	8	80.0	52.0	13,143	79.9	69.3	2	50.0	49.7	2,500	79.4	71.2	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>16,455</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>3,150</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.5	0	0.0	0.9	0	0.0	1.9	0	0.0	1.4	5.6
Moderate	0	0.0	6.5	0	0.0	3.8	0	0.0	8.0	0	0.0	4.5	17.1
Middle	0	0.0	27.7	0	0.0	20.6	0	0.0	27.8	0	0.0	18.5	33.8
Upper	0	0.0	64.3	0	0.0	74.7	0	0.0	62.3	0	0.0	75.5	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	32.1	0	0.0	30.1	0	0.0	25.8	0	0.0	11.0	23.7
Moderate	0	0.0	34.8	0	0.0	24.4	0	0.0	40.6	0	0.0	35.3	36.5
Middle	0	0.0	17.9	0	0.0	24.2	0	0.0	14.1	0	0.0	13.2	24.6
Upper	0	0.0	15.2	0	0.0	21.2	0	0.0	19.5	0	0.0	40.6	14.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	1	5.0	4.1	1,163	4.5	3.3	0	0.0	5.8	0	0.0	3.9	5.6
Moderate	1	5.0	14.6	75	0.3	8.8	0	0.0	17.3	0	0.0	12.1	17.1
Middle	3	15.0	32.4	3,387	13.0	22.4	2	22.2	30.9	650	4.5	19.8	33.8
Upper	15	75.0	48.9	21,394	82.2	65.5	7	77.8	45.9	13,902	95.5	64.2	43.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>26,018</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>14,552</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
2016-2020 U.S. Census Bureau: American Community Survey 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Distribution of 2021 and 2022 Home Mortgage Lending By Income Level of Geography													
Assessment Area: MSA 12060 ATL-Sandy Springs-Alpharetta, GA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2021						2022						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	10.7	0	0.0	6.9	0	0.0	9.1	0	0.0	5.9	5.8
Moderate	0	0.0	14.9	0	0.0	9.6	0	0.0	14.5	0	0.0	10.3	14.1
Middle	0	0.0	16.3	0	0.0	12.9	0	0.0	14.9	0	0.0	11.4	13.7
Upper	2	100.0	57.7	3,124	100.0	70.4	3	100.0	54.3	2,299	100.0	66.8	61.4
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	7.2	0	0.0	5.6	4.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>3,123</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>2,299</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	6.6	0	0.0	4.1	0	0.0	8.2	0	0.0	5.0	5.8
Moderate	0	0.0	12.5	0	0.0	7.6	0	0.0	17.6	0	0.0	11.1	14.1
Middle	0	0.0	14.4	0	0.0	10.8	0	0.0	18.8	0	0.0	13.7	13.7
Upper	0	0.0	66.3	0	0.0	77.4	2	100.0	49.8	1,227	100.0	65.8	61.4
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	5.7	0	0.0	4.3	4.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>1,227</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	6.1	0	0.0	3.9	0	0.0	3.8	0	0.0	2.3	5.8
Moderate	0	0.0	8.6	0	0.0	5.8	0	0.0	10.2	0	0.0	6.1	14.1
Middle	0	0.0	9.6	0	0.0	6.7	0	0.0	10.3	0	0.0	6.1	13.7
Upper	0	0.0	75.7	0	0.0	83.6	0	0.0	72.4	0	0.0	83.2	61.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	3.3	0	0.0	2.2	4.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	32.7	0	0.0	15.2	0	0.0	20.2	0	0.0	7.1	14.0
Moderate	0	0.0	14.9	0	0.0	20.2	0	0.0	20.2	0	0.0	18.3	13.5
Middle	0	0.0	15.8	0	0.0	21.8	0	0.0	13.5	0	0.0	13.1	12.8
Upper	0	0.0	35.6	0	0.0	39.7	0	0.0	34.6	0	0.0	44.1	47.3
Unknown	0	0.0	1.0	0	0.0	3.1	0	0.0	11.5	0	0.0	17.4	12.4
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	8.4	0	0.0	5.9	0	0.0	8.3	0	0.0	5.6	5.8
Moderate	0	0.0	13.4	0	0.0	9.1	0	0.0	14.9	0	0.0	11.0	14.1
Middle	0	0.0	15.0	0	0.0	12.2	0	0.0	15.5	0	0.0	11.7	13.7
Upper	3	100.0	63.0	17,124	100.0	72.5	5	100.0	55.2	3,526	100.0	65.5	61.4
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	6.2	0	0.0	6.3	4.9
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>17,123</b>	<b>100.0</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>3,526</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2022 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Home Mortgage Lending By Income Level of Geography Assessment Area: MSA 36740 Orlando-Kissimmee-Sanford, FL							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	1.9	0	0.0	1.1	1.9
Moderate	0	0.0	19.9	0	0.0	13.4	23.8
Middle	0	0.0	27.6	0	0.0	23.8	28.0
Upper	0	0.0	50.0	0	0.0	61.0	45.7
Unknown	0	0.0	0.5	0	0.0	0.6	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	1.3	0	0.0	0.9	1.9
Moderate	0	0.0	19.9	0	0.0	13.9	23.8
Middle	0	0.0	28.6	0	0.0	24.5	28.0
Upper	0	0.0	49.8	0	0.0	60.3	45.7
Unknown	0	0.0	0.4	0	0.0	0.3	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.7	0	0.0	0.5	1.9
Moderate	0	0.0	11.9	0	0.0	8.8	23.8
Middle	0	0.0	22.0	0	0.0	17.2	28.0
Upper	0	0.0	64.9	0	0.0	73.0	45.7
Unknown	0	0.0	0.5	0	0.0	0.5	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	8.3	0	0.0	8.6	8.7
Moderate	0	0.0	37.5	0	0.0	39.8	40.1
Middle	0	0.0	30.6	0	0.0	27.5	24.4
Upper	0	0.0	22.2	0	0.0	23.7	22.8
Unknown	0	0.0	1.4	0	0.0	0.5	4.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	1.6	0	0.0	2.1	1.9
Moderate	0	0.0	18.9	0	0.0	16.9	23.8
Middle	0	0.0	27.3	0	0.0	24.3	28.0
Upper	0	0.0	51.8	0	0.0	56.2	45.7
Unknown	0	0.0	0.5	0	0.0	0.5	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2022 FFIEC Census Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Small Business Lending by Income Level of Geography**

<b>Distribution of 2017 Small Business Lending By Income Level of Geography</b>							
<b>Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)</b>							
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Total Businesses %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Low</b>	0	0.0	5.1	0	0.0	3.3	5.4
<b>Moderate</b>	0	0.0	5.8	0	0.0	3.3	6.5
<b>Middle</b>	0	0.0	3.2	0	0.0	1.7	2.8
<b>Upper</b>	5	100.0	80.7	1,582	100.0	84.7	78.5
<b>Unknown</b>	0	0.0	4.8	0	0.0	6.8	6.8
<b>Tract-Unk</b>	0	0.0	0.4	0	0.0	0.2	
<b>Total</b>	5	100.0	100.0	1,582	100.0	100.0	100.0

Source: 2017 FFIEC Census Data  
2017 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

<b>Distribution of 2018 Small Business Lending By Income Level of Geography</b>							
<b>Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)</b>							
<b>Geographic Income Level</b>	<b>Bank And Aggregate Loans</b>						<b>Total Businesses %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>Low</b>	0	0.0	5.0	0	0.0	3.2	5.5
<b>Moderate</b>	0	0.0	5.6	0	0.0	3.6	5.9
<b>Middle</b>	0	0.0	3.2	0	0.0	1.8	2.8
<b>Upper</b>	3	100.0	80.5	350	100.0	83.5	79.5
<b>Unknown</b>	0	0.0	5.3	0	0.0	7.6	6.3
<b>Tract-Unk</b>	0	0.0	0.4	0	0.0	0.3	
<b>Total</b>	3	100.0	100.0	350	100.0	100.0	100.0

Source: 2018 FFIEC Census Data  
2018 Dun & Bradstreet Data  
-4-0 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Business %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	3.5	0	0.0	2.0	0	0.0	3.5	0	0.0	1.9	3.6
Moderate	0	0.0	7.1	0	0.0	4.6	0	0.0	6.9	0	0.0	4.4	7.3
Middle	0	0.0	3.2	0	0.0	1.6	0	0.0	3.1	0	0.0	1.6	2.8
Upper	2	100.0	80.5	1,400	100.0	82.9	9	100.0	80.8	1,962	100.0	83.9	80.0
Unknown	0	0.0	5.3	0	0.0	8.5	0	0.0	5.6	0	0.0	8.1	6.3
Tract- Total	0	0.0	0.5	0	0.0	0.3	0	0.0	0.1	0	0.0	0.1	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>1,400</b>	<b>100.0</b>	<b>100.0</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>1,962</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
-4-0 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 and 2022 Small Business Lending By Income Level of Geography Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Business %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	4.1	0	0.0	2.3	0	0.0	4.2	0	0.0	2.6	4.0
Moderate	1	11.1	8.1	1,000	43.6	4.9	0	0.0	6.7	0	0.0	4.3	5.8
Middle	0	0.0	3.6	0	0.0	1.9	0	0.0	5.1	0	0.0	3.0	4.6
Upper	8	88.9	79.1	1,294	56.4	83.7	1	100.0	74.4	1,000	100.0	78.8	75.1
Unknown	0	0.0	5.0	0	0.0	7.2	0	0.0	9.5	0	0.0	11.3	10.6
Tract- Total	0	0.0	0.2	0	0.0	0.0	0	0.0	0.2	0	0.0	0.1	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>2,294</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>1,000</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2017 Small Business Lending By Income Level of Geography Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	5.9	0	0.0	6.8	4.0
Moderate	0	0.0	14.3	0	0.0	20.2	10.0
Middle	0	0.0	25.6	0	0.0	26.0	21.9
Upper	2	100.0	54.2	825	100.0	47.0	64.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>825</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2017 FFIEC Census Data  
2017 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2018 Small Business Lending By Income Level of Geography Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	6.0	0	0.0	6.6	5.2
Moderate	0	0.0	15.0	0	0.0	20.3	13.6
Middle	0	0.0	25.5	0	0.0	26.2	24.7
Upper	0	0.0	53.5	0	0.0	47.0	56.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2018 FFIEC Census Data  
2018 Dun & Bradstreet Data  
-4-0 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2019 and 2020 Small Business Lending By Income Level of Geography Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Business %
	2019						2020						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	6.0	0	0.0	7.3	0	0.0	6.3	0	0.0	8.1	5.3
Moderate	0	0.0	14.9	0	0.0	21.5	0	0.0	14.5	0	0.0	19.3	14.0
Middle	0	0.0	25.4	0	0.0	25.7	4	28.6	26.0	587	48.1	26.6	24.3
Upper	3	100.0	53.7	1,513	100.0	45.5	10	71.4	53.2	634	51.9	46.0	56.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Untrackable	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>1,513</b>	<b>100.0</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>100.0</b>	<b>1,221</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
-4-0 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2021 and 2022 Small Business Lending By Income Level of Geography Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Business %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	1	10.0	9.8	550	19.0	11.8	0	0.0	9.0	0	0.0	9.5	8.7
Moderate	1	10.0	17.0	600	20.7	17.2	0	0.0	20.7	0	0.0	23.0	19.0
Middle	1	10.0	30.5	328	11.3	31.8	1	100.0	26.9	100	100.0	25.9	26.7
Upper	7	70.0	42.3	1,420	49.0	39.1	0	0.0	43.0	0	0.0	41.2	45.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.2	0.1
	0	0.0	0.3	0	0.0	0.1	0	0.0	0.3	0	0.0	0.1	
	10	100.0	100.0	2,898	100.0	100.0	1	100.0	100.0	100	100.0	100.0	100.0

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.



Distribution of 2021 and 2022 Small Business Lending By Income Level of Geography													
Assessment Area: MSA 12060 ATL-Sandy Springs-Alpharetta, GA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	0	0.0	8.5	0	0.0	6.5	0	0.0	5.7	0	0.0	4.6	6.6
Moderate	1	50.0	15.1	375	56.3	13.3	0	0.0	12.5	0	0.0	11.3	13.3
Middle	0	0.0	13.6	0	0.0	12.7	0	0.0	12.6	0	0.0	9.2	11.6
Upper	1	50.0	61.4	291	43.7	65.2	0	0.0	61.2	0	0.0	66.9	59.8
Unknown	0	0.0	1.1	0	0.0	2.2	0	0.0	7.9	0	0.0	7.9	8.7
Tract- Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>666</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Distribution of 2022 Small Business Lending By Income Level of Geography							
Assessment Area: MSA 36740 Orlando-Kissimmee-Sanford, FL							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	1.8	0	0.0	1.5	2.4
Moderate	0	0.0	27.2	0	0.0	30.9	28.7
Middle	0	0.0	25.8	0	0.0	25.1	27.1
Upper	1	100.0	43.1	500	100.0	40.4	39.9
Unknown	0	0.0	1.9	0	0.0	2.0	1.8
Tract- Unk	0	0.0	0.2	0	0.0	0.1	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>500</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2022 FFIEC Census Data  
2022 Dun & Bradstreet Data  
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

**Small Business Lending by Borrower Income Level**

<b>Distribution of 2017 Small Business Lending By Revenue Size of Businesses</b>							
<b>Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)</b>							
	<b>Bank And Aggregate Loans</b>						<b>Total Businesses %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	1	20.0	46.2	900	56.9	26.2	84.9
<b>Over \$1 Million</b>	1	20.0		50	3.2		14.2
<b>Revenue Unknown</b>	3	60.0		632	39.9		0.9
<b>Total</b>	5	100.0		1,582	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	2	40.0	93.9	100	6.3	39.5	
<b>\$100,001 - \$250,000</b>	1	20.0	3.1	147	9.3	14.4	
<b>\$250,001 - \$1 Million</b>	2	40.0	3.0	1,335	84.4	46.1	
<b>Total</b>	5	100.0	100.0	1,582	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	0	0.0		0	0.0		
<b>\$100,001 - \$250,000</b>	0	0.0		0	0.0		
<b>\$250,001 - \$1 Million</b>	1	100.0		900	100.0		
<b>Total</b>	1	100.0		900	100.0		
<i>Source: 2017 FFIEC Census Data 2017 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

<b>Distribution of 2018 Small Business Lending By Revenue Size of Businesses</b>							
<b>Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)</b>							
	<b>Bank And Aggregate Loans</b>						<b>Total Businesses %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	0	0.0	36.3	0	0.0	20.7	83.8
<b>Over \$1 Million</b>	2	66.7		300	85.7		15.4
<b>Revenue Unknown</b>	1	33.3		50	14.3		0.8
<b>Total</b>	3	100.0		350	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	2	66.7	94.0	100	28.6	41.4	
<b>\$100,001 - \$250,000</b>	1	33.3	3.3	250	71.4	15.9	
<b>\$250,001 - \$1 Million</b>	0	0.0	2.7	0	0.0	42.8	
<b>Total</b>	3	100.0	100.0	350	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	0	0.0		0	0.0		
<b>\$100,001 - \$250,000</b>	0	0.0		0	0.0		
<b>\$250,001 - \$1 Million</b>	0	0.0		0	0.0		
<b>Total</b>	0	0.0		0	0.0		
<i>Source: 2018 FFIEC Census Data 2018 Dun &amp; Bradstreet Data -4-0 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

<b>Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses</b>													
<b>Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)</b>													
	<b>Bank And Aggregate Loans By Year</b>												<b>Total Businesses %</b>
	<b>2019</b>						<b>2020</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>\$%</b>	<b>\$%</b>	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	0	0.0	38.8	0	0.0	20.7	0	0.0	32.5	0	0.0	14.9	85.2
<b>Over \$1 Million</b>	2	100.0		1,400	100.0		0	0.0		0	0.0		13.9
<b>Revenue Unknown</b>	0	0.0		0	0.0		9	100.0		1,962	100.0		0.9
<b>Total</b>	2	100.0		1,400	100.0		9	100.0		1,962	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	0	0.0	94.1	0	0.0	41.4	4	44.4	84.4	238	12.1	28.0	
<b>\$100,001 - \$250,000</b>	0	0.0	3.4	0	0.0	16.6	2	22.2	9.0	270	13.8	21.9	
<b>\$250,001 - \$1 Million</b>	2	100.0	2.6	1,400	100.0	41.9	3	33.3	6.6	1,454	74.1	50.0	
<b>Total</b>	2	100.0	100.0	1,400	100.0	100.0	9	100.0	100.0	1,962	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	0	0.0		0	0.0		0	0.0		0	0.0		
<b>\$100,001 - \$250,000</b>	0	0.0		0	0.0		0	0.0		0	0.0		
<b>\$250,001 - \$1 Million</b>	0	0.0		0	0.0		0	0.0		0	0.0		
<b>Total</b>	0	0.0		0	0.0		0	0.0		0	0.0		
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data -4-0 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MD 35614 (NYC-JC-White Plains, NY-NJ)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	0	0.0	33.0	0	0.0	13.6	0	0.0	41.3	0	0.0	23.8	85.2
Over \$1 Million	4	44.4		1,604	69.9		1	100.0		1,000	100.0		13.8
Revenue Unknown	5	55.6		690	30.1		0	0.0		0	0.0		1.0
<b>Total</b>	<b>9</b>	<b>100.0</b>		<b>2,294</b>	<b>100.0</b>		<b>1</b>	<b>100.0</b>		<b>1,000</b>	<b>100.0</b>		<b>100.0</b>
By Loan Size													
\$100,000 or Less	4	44.4	88.5	209	9.1	31.4	0	0.0	94.2	0	0.0	44.8	
\$100,001 - \$250,000	2	22.2	6.6	270	11.8	20.6	0	0.0	3.5	0	0.0	17.9	
\$250,001 - \$1 Million	3	33.3	4.9	1,815	79.1	48.0	1	100.0	2.2	1,000	100.0	37.3	
<b>Total</b>	<b>9</b>	<b>100.0</b>	<b>100.0</b>	<b>2,294</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>1,000</b>	<b>100.0</b>	<b>100.0</b>	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
<b>Total</b>	<b>0</b>	<b>0.0</b>		<b>0</b>	<b>0.0</b>		<b>0</b>	<b>0.0</b>		<b>0</b>	<b>0.0</b>		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

<b>Distribution of 2017 Small Business Lending By Revenue Size of Businesses</b>							
<b>Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>							
	<b>Bank And Aggregate Loans</b>						<b>Total Businesses %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	0	0.0	51.8	0	0.0	37.4	90.8
<b>Over \$1 Million</b>	2	100.0		825	100.0		7.7
<b>Revenue Unknown</b>	0	0.0		0	0.0		1.5
<b>Total</b>	2	100.0		825	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	0	0.0	95.4	0	0.0	46.0	
<b>\$100,001 - \$250,000</b>	0	0.0	2.3	0	0.0	12.9	
<b>\$250,001 - \$1 Million</b>	2	100.0	2.3	825	100.0	41.1	
<b>Total</b>	2	100.0	100.0	825	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	0	0.0		0	0.0		
<b>\$100,001 - \$250,000</b>	0	0.0		0	0.0		
<b>\$250,001 - \$1 Million</b>	0	0.0		0	0.0		
<b>Total</b>	0	0.0		0	0.0		
<i>Source: 2017 FFIEC Census Data 2017 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

<b>Distribution of 2018 Small Business Lending By Revenue Size of Businesses</b>							
<b>Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>							
	<b>Bank And Aggregate Loans</b>						<b>Total Businesses %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	0	0.0	44.0	0	0.0	32.5	90.0
<b>Over \$1 Million</b>	0	0.0		0	0.0		8.9
<b>Revenue Unknown</b>	0	0.0		0	0.0		1.1
<b>Total</b>	0	0.0		0	0.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	0	0.0	95.6	0	0.0	46.8	
<b>\$100,001 - \$250,000</b>	0	0.0	2.4	0	0.0	14.2	
<b>\$250,001 - \$1 Million</b>	0	0.0	2.0	0	0.0	39.1	
<b>Total</b>	0	0.0	100.0	0	0.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	0	0.0		0	0.0		
<b>\$100,001 - \$250,000</b>	0	0.0		0	0.0		
<b>\$250,001 - \$1 Million</b>	0	0.0		0	0.0		
<b>Total</b>	0	0.0		0	0.0		
<i>Source: 2018 FFIEC Census Data 2018 Dun &amp; Bradstreet Data -4-0 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

<b>Distribution of 2019 and 2020 Small Business Lending By Revenue Size of Businesses</b>													
<b>Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)</b>													
	<b>Bank And Aggregate Loans By Year</b>												<b>Total Businesses %</b>
	<b>2019</b>						<b>2020</b>						
	<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		<b>Bank</b>		<b>Agg</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>\$(000)</b>	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	1	33.3	46.2	938	62.0	33.7	0	0.0	38.5	0	0.0	22.9	90.4
<b>Over \$1 Million</b>	2	66.7		575	38.0		0	0.0		0	0.0		8.3
<b>Revenue Unknown</b>	0	0.0		0	0.0		14	100.0		1,221	100.0		1.2
<b>Total</b>	3	100.0		1,513	100.0		14	100.0		1,221	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	0	0.0	95.7	0	0.0	49.2	11	78.6	89.0	435	35.6	37.6	
<b>\$100,001 - \$250,000</b>	1	33.3	2.4	200	13.2	14.7	1	7.1	6.7	137	11.2	21.5	
<b>\$250,001 - \$1 Million</b>	2	66.7	2.0	1,313	86.8	36.2	2	14.3	4.2	650	53.2	40.8	
<b>Total</b>	3	100.0	100.0	1,513	100.0	100.0	14	100.0	100.0	1,221	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	0	0.0		0	0.0		0	0.0		0	0.0		
<b>\$100,001 - \$250,000</b>	0	0.0		0	0.0		0	0.0		0	0.0		
<b>\$250,001 - \$1 Million</b>	1	100.0		938	100.0		0	0.0		0	0.0		
<b>Total</b>	1	100.0		938	100.0		0	0.0		0	0.0		
<i>Source: 2020 FFIEC Census Data 2020 Dun &amp; Bradstreet Data -4-0 U.S. Census Bureau: ACS</i>													
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>													



Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 14860 (Bridgeport-Stamford-Norwalk, CT)													
	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	3	30.0	45.1	1,180	40.7	25.0	1	100.0	52.8	100	100.0	34.1	91.7
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		7.1
Revenue Unknown	7	70.0		1,718	59.3		0	0.0		0	0.0		1.2
<b>Total</b>	<b>10</b>	<b>100.0</b>		<b>2,898</b>	<b>100.0</b>		<b>1</b>	<b>100.0</b>		<b>100</b>	<b>100.0</b>		<b>100.0</b>
By Loan Size													
\$100,000 or Less	4	40.0	92.8	140	4.8	41.0	1	100.0	95.6	100	100.0	47.3	
\$100,001 - \$250,000	1	10.0	4.4	105	3.6	20.2	0	0.0	2.5	0	0.0	15.9	
\$250,001 - \$1 Million	5	50.0	2.8	2,653	91.5	38.8	0	0.0	1.8	0	0.0	36.8	
<b>Total</b>	<b>10</b>	<b>100.0</b>	<b>100.0</b>	<b>2,898</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>100.0</b>	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	0	0.0		0	0.0		1	100.0		100	100.0		
\$100,001 - \$250,000	1	33.3		105	8.9		0	0.0		0	0.0		
\$250,001 - \$1 Million	2	66.7		1,075	91.1		0	0.0		0	0.0		
<b>Total</b>	<b>3</b>	<b>100.0</b>		<b>1,180</b>	<b>100.0</b>		<b>1</b>	<b>100.0</b>		<b>100</b>	<b>100.0</b>		
Source: 2022 FFIEC Census Data 2022 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: ACS													
Note: Percentages may not total 100.0 percent due to rounding.													

Distribution of 2021 and 2022 Small Business Lending By Revenue Size of Businesses													
Assessment Area: MSA 12060 ATL-Sandy Springs-Alpharetta, GA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2021						2022						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	\$%	\$%	#	%	%	\$(000)	\$%	\$%	
<b>By Revenue</b>													
\$1 Million or Less	2	100.0	40.5	666	100.0	26.3	0	0.0	46.3	0	0.0	34.3	91.9
Over \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		6.9
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.2
<b>Total</b>	<b>2</b>	<b>100.0</b>		<b>666</b>	<b>100.0</b>		<b>0</b>	<b>0.0</b>		<b>0</b>	<b>0.0</b>		<b>100.0</b>
<b>By Loan Size</b>													
\$100,000 or Less	0	0.0	93.6	0	0.0	39.5	0	0.0	95.9	0	0.0	47.2	
\$100,001 - \$250,000	0	0.0	3.7	0	0.0	17.7	0	0.0	2.2	0	0.0	13.4	
\$250,001 - \$1 Million	2	100.0	2.7	666	100.0	42.8	0	0.0	1.9	0	0.0	39.4	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>666</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
\$100,000 or Less	0	0.0		0	0.0		0	0.0		0	0.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	2	100.0		666	100.0		0	0.0		0	0.0		
<b>Total</b>	<b>2</b>	<b>100.0</b>		<b>666</b>	<b>100.0</b>		<b>0</b>	<b>0.0</b>		<b>0</b>	<b>0.0</b>		
Source: 2022 FFIEC Census Data													
2022 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

<b>Distribution of 2022 Small Business Lending By Revenue Size of Businesses</b>							
<b>Assessment Area: MSA 36740 Orlando-Kissimmee-Sanford, FL</b>							
	<b>Bank And Aggregate Loans</b>						<b>Total Businesses %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	1	100.0	51.5	500	100.0	34.7	94.0
<b>Over \$1 Million</b>	0	0.0		0	0.0		4.9
<b>Revenue Unknown</b>	0	0.0		0	0.0		1.1
<b>Total</b>	1	100.0		500	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	0	0.0	96.2	0	0.0	52.1	
<b>\$100,001 - \$250,000</b>	0	0.0	2.3	0	0.0	15.2	
<b>\$250,001 - \$1 Million</b>	1	100.0	1.5	500	100.0	32.7	
<b>Total</b>	1	100.0	100.0	500	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	0	0.0		0	0.0		
<b>\$100,001 - \$250,000</b>	0	0.0		0	0.0		
<b>\$250,001 - \$1 Million</b>	1	100.0		500	100.0		
<b>Total</b>	1	100.0		500	100.0		
<i>Source: 2022 FFIEC Census Data 2022 Dun &amp; Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

**APPENDIX C - SCOPE OF EVALUATION**

SCOPE OF EXAMINATION			
<b>TIME PERIOD REVIEWED</b>		Lending Test: January 1, 2017- December 31, 2022 Community Development Activities: January 1, 2017- December 31, 2023	
<b>FINANCIAL INSTITUTION</b> Fieldpoint Private Bank & Trust One Greenwich Plaza Greenwich, Connecticut 06830			<b>PRODUCTS REVIEWED</b> Home Mortgage Loans Small Business Loans
<b>AFFILIATE(S)</b>	<b>AFFILIATE RELATIONSHIP</b>		<b>PRODUCTS REVIEWED</b>
None	N/A		N/A
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
<b>STATE OF NEW YORK</b>			
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	Full-scope Review	None	None
<b>STATE OF CONNECTICUT</b>			
MSA 14860 (Bridgeport-Stamford-Norwalk, CT)	Full-scope Review	None	None
<b>STATE OF GEORGIA</b>			
MSA 12060 (Atlanta-Sandy Springs Alpharetta, GA)	Full-scope Review	None	None
<b>STATE OF FLORIDA</b>			
MSA 36740 (Orlando-Kissimmee-Sanford, FL)	Full-scope Review	None	None

## APPENDIX D - 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, relatively permanent statistical subdivision of a county or statistically equivalent entity delineated for data presentation purposes by a local group of census data users or the geographic staff of a regional census center in accordance with Census Bureau guidelines. Designed to be relatively homogeneous units with respect to population characteristics, economic status, and living conditions at the time they are established, census tracts generally contain between 1,000 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries are delineated with the intention of being stable over many decades, so they generally follow relatively permanent visible features. However, they may follow governmental unit boundaries and other invisible features in some instances; the boundary of a state or county (or statistically equivalent entity) is always a census tract boundary.

**Community development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet 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, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

1. Low-or moderate-income geographies;
2. Designated disaster areas; or
3. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, 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.

**Distressed or Underserved Non-Metropolitan Middle-Income Area:** A middle-income, nonmetropolitan geography that is distressed due to economic factors, such as unemployment levels, poverty, or population loss, or is underserved based on population size, density, and dispersion.

**Family:** A family is a group of two or more people related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

**Full 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 metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

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

**Household:** A household consists of all the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household. The count of households excludes group quarters.

**Limited-scope review:** Performance is analyzed using only quantitative factors.

**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 metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A 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. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a 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.

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

**Other products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during the CRA evaluation. 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 metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

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

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