

PUBLIC DISCLOSURE

April 19, 2021

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

**First Home Bank
700 Central Avenue
Saint Petersburg, Florida 33701**

RSSD ID NUMBER: 2771694

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION'S CRA RATING

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

Major factors supporting the institution's rating include:

- The bank's loan-to-deposit ratio is reasonable given its asset size, financial condition, and assessment area credit needs.
- A majority of the bank's HMDA-reportable loans were made outside the assessment area; however, a substantial majority of small business loans were made within the assessment area.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment area.
- The distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes and individuals of different income levels, including low- and moderate-income individuals.
- Neither the bank nor this Reserve Bank has received any CRA-related complaints since the previous examination.

INSTITUTION

SCOPE OF EXAMINATION

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

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

Since the last examination, the bank converted a loan production office (LPO) in Sarasota into a branch office and, as such, the bank added the Sarasota MSA as an assessment area. A full-scope review was conducted of the Tampa assessment area, while the Sarasota assessment area was reviewed using limited-scope procedures. When determining the overall rating, greater weight was placed on the bank's performance in the Tampa assessment area because a larger deposit share and the majority of branches and lending are in this assessment area.

The evaluation included an analysis of Home Mortgage Disclosure Act (HMDA) and small business loans originated from January 1, 2018, through December 31, 2019. First Home Bank submits annual reports about its residential real estate loan applications and originations pursuant to the HMDA and these loans are referred to as "HMDA-reportable" loans in this evaluation. A small business loan is defined as a business loan with an original amount of \$1 million or less and typically is either secured by nonfarm or nonresidential real estate or classified as commercial loans. These loan products were selected for analysis because they represent the majority of the bank's loan portfolio. The complaints performance criterion was not evaluated because neither the bank nor this Reserve Bank received any CRA-related complaints during the review period.

One community contact was made with a local affordable housing representative who is familiar with the economic and demographic characteristics as well as community development opportunities in the bank's full-scope assessment area. Information obtained from the contact was used to establish a context for the communities in which the bank operates and to gather information on the bank's performance. Specific information obtained from the community contact is included in the applicable section of the evaluation for the assessment area.

DESCRIPTION OF INSTITUTION

First Home Bank is a Florida chartered financial institution organized on February 12, 1999 and has operated as a local bank with no subsidiaries. First Home Bank became a state-member as of January 1, 2016 and is wholly owned by First Home Bancorp, Inc., a non-complex small shell one-bank holding company which commenced operations on September 1, 2000.

The previous CRA examination for First Home Bank was dated December 12, 2016, and was conducted by the Federal Reserve Bank of Atlanta using the Interagency Small Institution Examination Procedures, and considered the bank’s residential real estate loans and small business loans originated from January 1, 2014, through December 31, 2015.

Branch Offices

The bank’s main office is in St. Petersburg, Florida. Since the previous examination, the bank converted a loan production office (LPO) into a full-service branch on October 29, 2018 in Sarasota County. The bank has a total of five branches within its designated assessment areas in Florida. Four of the branches are in Tampa, and one branch is in Sarasota. The bank has two branches in moderate-income tracts, two branches in middle-income tracts, and one branch in upper-income tracts as of December 31, 2019.

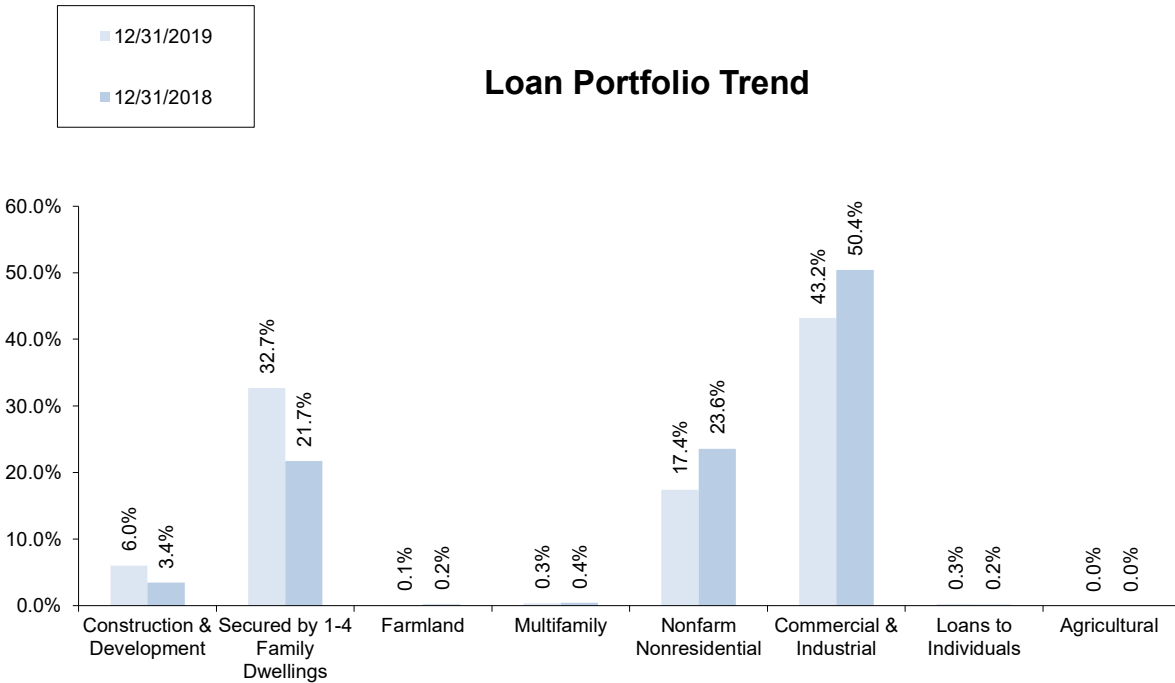
Loan Portfolio

According to the December 31, 2019, Report of Condition (ROC), the bank’s assets totaled \$531.2 million, an increase of approximately \$398.4 million, or 300.0 percent, since the bank’s previous CRA evaluation conducted on December 12, 2016.

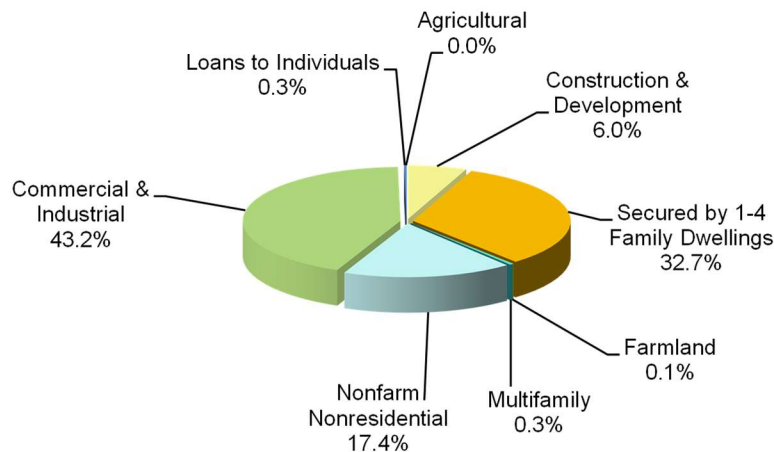
The following table and graphs show the composition of the loan portfolio according to the Consolidated Report of Condition and Income (Call Report).

COMPOSITION OF LOAN PORTFOLIO				
Loan Type	12/31/2019		12/31/2018	
	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	23,578	6.0%	10,659	3.4%
Secured by One- to Four- Family Dwellings	127,647	32.7%	67,367	21.7%
Other Real Estate: Farmland	352	0.1%	659	0.2%
Multifamily	1,296	0.3%	1,392	0.4%
Nonfarm nonresidential	67,961	17.4%	73,049	23.6%
Commercial and Industrial	168,550	43.2%	156,285	50.4%
Loans to Individuals	1,038	0.3%	531	0.2%
Agricultural Loans	0	0.0%	0	0.0%
Total	\$390,422	100.00%	\$309,942	100.00%

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



**Loan Portfolio
as of
12/31/2019**



As illustrated in the table and charts above, the bank’s loan portfolio as of December 31, 2019 consisted primarily of commercial and industrial loans (43.2 percent) followed by loans secured by one-to four-family dwellings (32.7 percent), and nonfarm nonresidential loans (17.4 percent).

Credit Products

The bank’s loan product offerings are relatively non-complex. Commercial lending makes up a significant majority of the bank’s loan portfolio. The bank has invested substantial resources in building an infrastructure necessary to support the Small Business Administration (SBA) Lending Program. As a result, the vast majority of the bank’s

commercial loans are SBA loans. Residential real estate (RRE) loans make up the second largest portion of the bank's loan portfolio. The bank also offers secondary market RRE loan products. In addition, the bank offers agricultural, consumer installment and single-pay loans, and home equity lines of credit (HELOC).

First Home Bank complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its assessment areas. The bank received a "Satisfactory" rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta dated December 12, 2016, under the small bank examination procedures.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Overview

First Home Bank's overall performance under the lending test is rated satisfactory. The bank's lending performance was evaluated by analyzing HMDA-reportable loans and small business loans originated between January 1, 2018 and December 31, 2019. Small business lending represents the primary line of business for the institution.

Given the bank's asset size and office(s) located in an MSA, it submits annual reports about its residential real estate loan originations and applications, pursuant to the Home Mortgage Disclosure Act (HMDA). These loans are referred to as "HMDA-reportable" loans in this evaluation. For purposes of CRA, a small business loan is defined as a business loan with an original amount of \$1 million or less and typically is either secured by nonfarm or nonresidential real estate or classified as commercial loans.

Loan-to-Deposit (LTD) Ratio

The bank's net LTD ratio reflects reasonable responsiveness to meeting the overall assessment area's credit needs. The bank's LTD ratio is reasonable given its asset size, financial condition, and assessment area credit needs. The bank's average net LTD ratio for the 13 quarters ending December 31, 2019, was 92.6 percent. The LTD ratio was compared with those of six other depository institutions in the assessment area over the same time period; their ratios ranged from 58.6 percent to 116.1 percent. Performance context information such as competition and business strategy were considered in determining the reasonableness of the LTD ratio.

Assessment Area Concentration

The bank originated a majority of the total loans to borrowers outside the bank's assessment area; however, a substantial majority of small business loans were originated to businesses located within the bank's assessment area. The table below shows, by product type, the number, and percentage of loans reviewed that were located inside and outside of the bank's assessment areas.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	24	40.7	\$2,059	16.5	35	59.3	\$10,385	83.5
Home Purchase - Conventional	391	25.4	\$126,513	28.5	1,147	74.6	\$316,768	71.5
Home Purchase - FHA	39	4.8	\$8,313	4.4	769	95.2	\$180,159	95.6
Home Purchase - VA	24	6.7	\$7,205	6.8	336	93.3	\$98,135	93.2
Other Purpose Closed-End	2	100.0	\$48	100.0	0	0.0	\$0	0.0
Other Purpose LOC	11	100.0	\$1,152	100.0	0	0.0	\$0	0.0
Refinancing	179	9.5	\$49,919	9.2	1,712	90.5	\$494,202	90.8
Total HMDA related	670	14.3	\$195,209	15.1	3,999	85.7	\$1,099,649	84.9
Small Business	55	96.5	\$15,108	94.3	2	3.5	\$913	5.7
Total Small Bus. related	55	96.5	\$15,108	94.3	2	3.5	\$913	5.7
TOTAL LOANS	725	15.3	\$210,317	16.0	4,001	84.7	\$1,100,562	84.0

As illustrated in the table above, 14.3 percent of the HMDA-reportable loans, and 96.5 percent of small business loans are to borrowers and businesses residing within the bank’s assessment area. The bank’s HMDA-reportable lending in the assessment area is low because of several factors. First Home Bank operated its residential mortgage business on a brokered loan basis prior to the current examination period. The bank largely focused on branch referrals, as well as some local realtor referrals. The bank employed five dedicated mortgage loan originators to originate loans within the assessment area. The bank converted its current mortgage banking platform, which involved a complete overhaul in processes, systems, products, and procedures, as well as new secondary market requirements. The locally hired mortgage loan originators could not withstand the rigor of the conversion and they additionally required training; therefore, they resigned during the review period. The lack of staff impacted the bank’s ability to originate HMDA-reportable loans in the assessment area. Additionally, the bank has 20 LPOs that originate HMDA-reportable loans nationwide, resulting in the large volume of loans originated outside the assessment area. By the end of 2019, bank management hired local staff and provided training to boost HMDA-reportable loan originations in the assessment area. This indicates the bank’s willingness to originate loans that meet the credit needs of its assessment areas.

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

The geographic distribution of the bank’s HMDA-reportable and small business loans reflects reasonable dispersion throughout the assessment areas given the opportunities, the bank’s financial condition, and competition in these markets.

The distribution by borrower income and business revenue reflects reasonable penetration among borrowers of different income levels and to businesses of different revenue sizes and does not reveal any unexplained gaps in lending patterns. The analyses of HMDA-reportable and small business lending within the full-scope assessment area are discussed in detail later in this report.

RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS

Neither the bank nor this Reserve Bank has received any CRA-related complaints since the previous evaluation.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**METROPOLITAN AREA
FULL-SCOPE REVIEW**

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

Overview

The bank’s Tampa assessment area consists of four counties—Pinellas, Hillsborough, Pasco, and Hernando. These four counties make up the Tampa-St. Petersburg-Clearwater, Florida MSA (Tampa MSA). The bank operates four branches within the Tampa assessment area. As of December 31, 2019, one of the bank’s branches is in a moderate-income census tract, two are in middle-income census tracts, and one is in an upper-income census tract.

Population Information

The Tampa MSA has grown steadily and at a faster pace than the statewide population growth. Between 2015 and 2019, the population of the assessment area increased by 7.2 percent (from 2,888,458 residents in 2015 to 3,097,859 residents in 2019).² Over the same time period, the population of the state of Florida grew by 6.4 percent, from 19,645,772 residents in 2015 to 20,901,636 residents in 2019. Although Hillsborough County is the largest county in the assessment area, Pasco County experienced the slightly greater population growth, increasing 9.5 percent between 2015 and 2019.³ The population growth for Hillsborough County for the same period increased by 9.2 percent.⁴

Income Characteristics

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income. The following table sets forth the estimated median family income for 2018 and 2019 for the Tampa-St. Petersburg-Clearwater, FL MSA. The table also provides a breakdown of the estimated annual income based on income category (low, moderate, middle, and upper). As shown, the FFIEC estimated median family income for the Tampa MSA in 2018 was \$63,900 and increased to \$66,900 in 2019.

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

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2018	\$63,900	0 - \$31,949	\$31,950 - \$51,119	\$51,120 - \$76,679	\$76,680 - & above
2019	\$66,900	0 - \$33,449	\$33,450 - \$53,519	\$53,520 - \$80,279	\$80,280 - & above

According to the 2019 FFIEC census data, there were 702,244 families in the assessment area. Of those families, 21.6 percent were low-income, 17.9 percent were moderate-income, 19.1 percent were middle-income, and 41.4 percent were upper-income. Of the total families, 11.2 percent had incomes below the poverty level. Additionally, 39.2 percent of families in low-income tracts and 18.5 percent of families in moderate-income tracts have incomes below the poverty level. The concentration of families living below the poverty level in low- and moderate-income tracts may create challenges to lending in these tracts.

² “Total Population.” U.S. Census Bureau, 2011-2015 & 2015-2019 American Community Survey 5-Year Estimates, 22 July 2021, <https://data.census.gov/cedsci/>.

³ Ibid

⁴ Ibid

Demographic Data by Census Tracts

The 2019 FFIEC census data along with the 2019 Dun & Bradstreet (D&B) information was used in the analysis of the bank's 2018 and 2019 HMDA-reportable and small business lending performance. According to 2019 census data, the assessment area consisted of 746 census tracts. Although the total number of census tracts in the assessment area has not changed, the income tract distribution changed since the previous examination due to the Office of Management and Budget (OMB) changes. The assessment area is made up of 41 low-income census tracts; 195 moderate-income census tracts, 271 middle-income census tracts, 222 upper-income census tracts, and 17 census tracts that have unknown income designations. The OMB changes resulted in the reclassification of the income levels of some census tracts. The bank gained eight low-income tracts and four moderate-income tracts since the last examination as a result of the OMB changes. The assessment area consists of whole census tracts and does not arbitrarily exclude any low- and moderate-income areas.

Housing Characteristics

There were 1,368,924 housing units in the assessment area, of which 53.9 percent were owner-occupied units, 29.8 percent were rental units and 16.3 percent were vacant, according to the 2019 FFIEC census data. A higher percentage (58.5 percent) of the housing units in low-income tracts were rental units, and 17.8 percent were vacant units; therefore, there may be limited opportunities for home mortgage lending in these tracts. In moderate-income tracts, 34.4 percent of housing units were rental units, and 19.3 percent of housing units were vacant units. The largest number of housing units, 549,024 (40.1 percent), were in Hillsborough County, which also had the highest percentage of rental units at 36.8 percent. The median age of the housing stock in the assessment area was 39 years, but housing in Pinellas County was older (40 years) as compared to Hernando County (26 years), Hillsborough (28 years), and Pasco County (29 years). The median age of housing units in low- and moderate-income census tracts (46 years and 44 years, respectively) was older compared to the assessment area overall. These factors indicate that residential real estate lending opportunities may be limited in low- and moderate-income tracts.

The assessment area's overall affordability ratio is 32.6 compared to the state of Florida at 29.9, indicating that housing in the assessment area is slightly more affordable than elsewhere in the state. The affordability ratio is defined as the median household income divided by the median housing value. A higher ratio means the housing is considered more affordable while a lower ratio means the housing is considered less affordable. In addition to the housing affordability, 51.6 percent of homeowners in Hillsborough, 51.0 percent of homeowners in Pinellas County, 50.1 percent of homeowners in Pasco County, and 49.3 percent of homeowners in Hernando County are considered cost-burdened, meaning that homeowners spent more than 30.0 percent of their income on housing costs.

Employment Statistics

The Tampa area is a leading location for corporate site selection in North America. Over the past several years, globally renowned companies such as IRONMAN, Bertram Yachts, The Mosaic Company, Amgen, TransferWise, and United Airlines have chosen to call Tampa Bay home. In 2018, Baker McKenzie announced the opening of a shared service Tampa office, which added about 300 employees.⁶ Tampa's reputation as a business-friendly community that offers top talent and an outstanding quality of life is convincing companies from across the industry spectrum to relocate or expand in the area. Eleven companies announced they would create 805 new jobs and invest \$164.4 million in Hillsborough County in 2019, including Penske Truck Leasing, The Home Depot, Anuvia and RedRock Pavers, Inc.⁷ Major employers in the region include BayCare Health

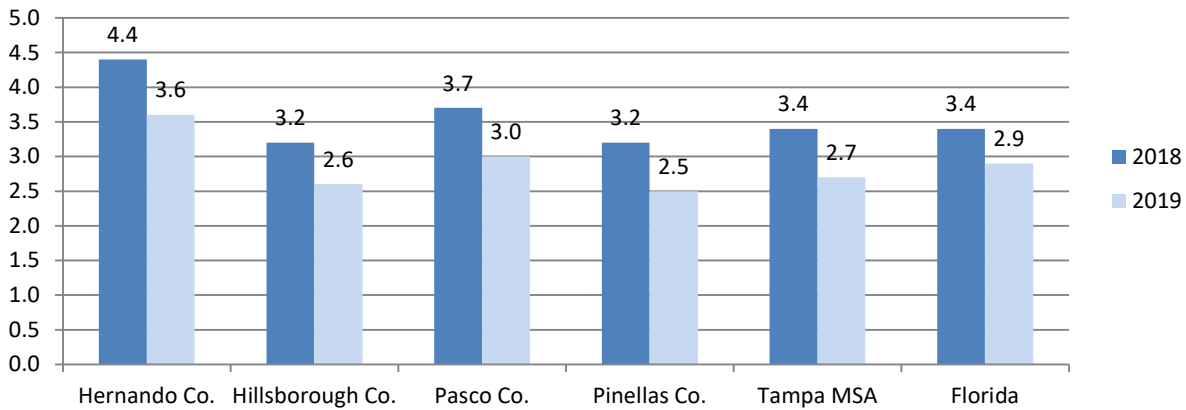
⁶ "Tampa Bay Community Overview." Tampa Bay Economic Development Council, June 2020, tampabayedc.com/wp-content/uploads/2020/06/Tampa-Bay-Community-Overview.pdf. Accessed June 8, 2021.

⁷ "Tampa Hillsborough Economic Development Corporation 2019 Annual Report." Tampa Bay Economic Development Council, Jan. 2020, tampabayedc.com/wp-content/uploads/2020/01/2019-Annual-Report-10-year-journey.pdf. Accessed June 8, 2021.

Care System, Publix Super Markets, Hillsborough County School District, HCA West Florida Division, and MacDill Air Force Base.⁸

The following chart shows the unemployment rates for the bank’s assessment area and the State of Florida. The chart shows that the unemployment rate for the assessment area declined from 3.4 percent in 2018 to 2.7 percent in 2019, which was slightly lower than the Florida statewide unemployment rate of 2.9 percent in 2019. The unemployment rate for all counties in the assessment area declined from 2018 to 2019, but the unemployment rate in Hernando County was higher than the three other counties, the MSA, and the state of Florida.

Unemployment Rates: Tampa



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

Competition

The Tampa MSA remains a competitive banking market where national and regional banks have a significant presence. According to the June 30, 2019 FDIC Summary of Deposits Report, First Home Bank ranked 26th in deposit market share with 0.4 percent of total deposits in the Tampa assessment area. During the time period, there were 55 institutions operating 670 branches in the assessment area. Raymond James Bank, NA ranked 1st in deposit market share, followed by Bank of America, NA, and Wells Fargo Bank, NA. According to the 2019 HMDA Market Peer Report for the Tampa MSA, the bank had 0.1 percent of total HMDA-reportable lending and ranked 107th out of 1,018 financial institutions originating HMDA-reportable loans in the assessment area. The bank’s competition comes mainly from national banks, multi-regional banks, and non-bank mortgage lenders. Wells Fargo Bank, NA ranked first followed by Quicken Loans, Inc., United Shore Financial Services, and Caliber Home Loans, Inc. The bank’s low rankings in deposit market share and HMDA-reportable lending indicate the strength of competition in the market, which affects the bank’s ability to originate loans in its assessment area.

Community Contacts

As part of the CRA examination, information was obtained from a representative of a local affordable housing organization. According to the contact, the greatest challenge in the Tampa area is the limited inventory of housing affordable to low- and moderate-income individuals in the area. Furthermore, the demand for housing is driving up the home sales price of all units, which exacerbates the problem. According to the contact, investors are purchasing properties in cash and are looking to flip the houses they purchase for profit. The contact stated that this was particularly prevalent in Pinellas and Pasco counties. Additionally, there is a need for banks to support homebuyer counseling for low- and moderate-income individuals, and to provide financial support for

⁸ Erickson, Chris. “Largest Employers in Tampa Bay.” Lists: Employers and Who's Who, Tampa Bay Business Journal, 5 July 2019, www.bizjournals.com/tampabay/subscriber-only/2019/07/05/largest-employers-in-tampa-bay.html. Accessed June 4, 2021.

organizations that provide affordable housing for low- and moderate-income families. According to the contact, some local financial institutions have first time homebuyer programs; however, loan officers at these institutions may not have the requisite training to properly educate homebuyers. Lastly, the contact stated that financial support from banks has decreased because some banks have prioritized other initiatives to get CRA credits.

General Economic and Business Characteristics

According to bank management and community contacts, economic conditions in the assessment area are relatively stable. The city of Tampa is the economic hub of west central Florida. Its economy is funded on a diverse base that includes tourism, healthcare, finance, insurance, technology, construction, and maritime industry.⁹ An annual economic impact report by industry analyst, Tourism Economics, reveals that tourism accounted for \$6.9 billion into Hillsborough County's bottom line in 2019, a 67.0 percent increase in the last decade.¹⁰ Despite the growth in revenue from tourism, a review of several economic indicators and data from the Tampa Bay metropolitan area, including Hernando, Hillsborough, Pasco, and Pinellas counties suggest a growth slowdown may be occurring in the Tampa Bay economy. While growth is expected to remain positive for the foreseeable future, signs of its moderation have appeared in the local labor, consumer and housing markets.¹¹

Assessment Area Demographics

The following table provides demographic characteristics of the bank's assessment area based on the 2019 FFIEC census data and 2019 Dun & Bradstreet data used to analyze the bank's CRA performance. Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis.

⁹ "Development & Economic Opportunity." City of Tampa, 2021, www.tampa.gov/DEO Accessed June 07, 2021.

¹⁰ "Tourism Generate \$6.9 Billion in 2019." Visit Tampa Bay, 5 Aug. 2020, www.visittampabay.com/media/news/post/tourism-generates-69-billion-in-2019/ Accessed July 22, 2021.

¹¹ Stinespring, John R. "Tampa Bay Forecast: Signs of Slowing Growth." The Tampa Bay Economy, The University of Tampa -Sykes College of Business, www.ut.edu/uploadedFiles/Academics/Business/The%20Tampa%20Bay%20Economy%20-%20Spring%202019.pdf Accessed June 06, 2021.

Combined Demographics Report

Assessment Area: Tampa

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	41	5.5	25,578	3.6	10,031	39.2	151,617	21.6
Moderate-income	195	26.1	163,714	23.3	30,306	18.5	125,667	17.9
Middle-income	271	36.3	268,231	38.2	26,645	9.9	134,278	19.1
Upper-income	222	29.8	243,900	34.7	11,670	4.8	290,682	41.4
Unknown-income	17	2.3	821	0.1	202	24.6	0	0
Total Assessment Area	746	100.0	702,244	100.0	78,854	11.2	702,244	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	59,342	14,061	1.9	23.7	34,692	58.5	10,589	17.8
Moderate-income	348,136	161,253	21.9	46.3	119,764	34.4	67,119	19.3
Middle-income	536,375	292,441	39.7	54.5	157,352	29.3	86,582	16.1
Upper-income	422,818	269,219	36.5	63.7	94,753	22.4	58,846	13.9
Unknown-income	2,253	437	0.1	19.4	1,529	67.9	287	12.7
Total Assessment Area	1,368,924	737,411	100.0	53.9	408,090	29.8	223,423	16.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	7,910	4.1	7,013	3.9	846	7.7	51	3.2
Moderate-income	41,859	21.5	39,076	21.5	2,550	23.1	233	14.7
Middle-income	69,222	35.6	64,434	35.4	4,308	39.1	480	30.3
Upper-income	74,885	38.5	70,794	38.9	3,277	29.7	814	51.4
Unknown-income	568	0.3	513	0.3	50	0.5	5	0.3
Total Assessment Area	194,444	100.0	181,830	100.0	11,031	100.0	1,583	100.0
Percentage of Total Businesses:			93.5		5.7		.8	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	17	1.1	15	1	2	3.6	0	0
Moderate-income	316	21	302	20.9	14	25	0	0
Middle-income	648	43.1	621	42.9	25	44.6	2	100
Upper-income	523	34.8	508	35.1	15	26.8	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	1,504	100.0	1,446	100.0	56	100.0	2	100.0
Percentage of Total Farms:			96.1		3.7		.1	

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Overview

The review analyzed 360 HMDA-reportable loans, and 41 small business loans made in the Tampa assessment area. Based on the following analysis, the geographic distribution of loans reflects reasonable dispersion throughout the assessment area. Also, the distribution of borrowers reflects reasonable penetration among businesses of different revenue and individuals of different income levels, including low- and moderate-income individuals.

Geographic Distribution of Loans

The geographic distribution of HMDA-reportable loans and small business loans for 2018 and 2019 was compared to available demographic information. Performance context issues were also taken into consideration.

Residential Real Estate (HMDA) Lending

The following tables show the geographic distribution of First Home Bank's HMDA-reportable loans for 2018 and 2019 within its Tampa assessment area and also include a comparison of the bank's HMDA-reportable lending to the aggregate HMDA lenders within the assessment area. The HMDA aggregate lenders' data are the combined total of lending activity reported by all lenders subject to HMDA in the assessment area.

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Tampa

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2018			2019								
		Count		Dollar			Count		Dollar			Count			Dollar			
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	8	3.1%	\$1,256	1.8%	1.9%	4	3.1%	1.6%	\$651	1.8%	1.2%	4	3.2%	2.1%	\$605	1.9%	1.5%
	Moderate	48	18.9%	\$8,077	11.9%	21.9%	21	16.2%	18.9%	\$3,044	8.6%	13.4%	27	21.8%	19.5%	\$5,033	15.5%	13.8%
	Middle	94	37.0%	\$21,679	31.8%	39.7%	50	38.5%	39.1%	\$11,812	33.2%	34.6%	44	35.5%	38.9%	\$9,867	30.3%	34.5%
	Upper	104	40.9%	\$37,146	54.5%	36.5%	55	42.3%	40.3%	\$20,083	56.4%	50.8%	49	39.5%	39.4%	\$17,063	52.4%	50.0%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	254	100.0%	\$68,158	100.0%	100.0%	130	100.0%	100.0%	\$35,590	100.0%	100.0%	124	100.0%	100.0%	\$32,568	100.0%	100.0%
REFINANCE	Low	1	1.2%	\$202	0.9%	1.9%	0	0.0%	1.6%	\$0	0.0%	1.1%	1	2.0%	1.4%	\$202	1.3%	1.0%
	Moderate	15	18.3%	\$2,325	10.7%	21.9%	2	6.3%	17.3%	\$195	3.0%	12.1%	13	26.0%	15.0%	\$2,130	14.1%	10.7%
	Middle	21	25.6%	\$4,693	21.7%	39.7%	13	40.6%	38.9%	\$2,516	38.6%	33.9%	8	16.0%	37.6%	\$2,177	14.4%	32.3%
	Upper	45	54.9%	\$14,432	66.7%	36.5%	17	53.1%	42.2%	\$3,811	58.4%	52.7%	28	56.0%	45.9%	\$10,621	70.2%	55.9%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	82	100.0%	\$21,652	100.0%	100.0%	32	100.0%	100.0%	\$6,522	100.0%	100.0%	50	100.0%	100.0%	\$15,130	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	0.9%	\$0	0.0%	0.7%	0	0.0%	1.4%	\$0	0.0%	1.3%
	Moderate	4	16.7%	\$150	7.3%	21.9%	4	16.7%	14.2%	\$150	7.3%	11.3%	0	0.0%	14.0%	\$0	0.0%	11.1%
	Middle	4	16.7%	\$233	11.3%	39.7%	4	16.7%	37.4%	\$233	11.3%	33.3%	0	0.0%	38.3%	\$0	0.0%	34.3%
	Upper	16	66.7%	\$1,676	81.4%	36.5%	16	66.7%	47.5%	\$1,676	81.4%	54.7%	0	0.0%	46.3%	\$0	0.0%	53.3%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%
	Total	24	100.0%	\$2,059	100.0%	100.0%	24	100.0%	100.0%	\$2,059	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	6.8%	0	0.0%	11.3%	\$0	0.0%	3.1%	0	0.0%	12.8%	\$0	0.0%	12.8%
	Moderate	0	0.0%	\$0	0.0%	22.7%	0	0.0%	30.4%	\$0	0.0%	15.9%	0	0.0%	34.0%	\$0	0.0%	31.8%
	Middle	0	0.0%	\$0	0.0%	40.8%	0	0.0%	35.0%	\$0	0.0%	39.2%	0	0.0%	36.7%	\$0	0.0%	24.4%
	Upper	0	0.0%	\$0	0.0%	29.3%	0	0.0%	23.3%	\$0	0.0%	41.8%	0	0.0%	16.0%	\$0	0.0%	30.7%
	Unknown	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.3%
Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	0.8%	\$0	0.0%	0.5%	0	0.0%	0.8%	\$0	0.0%	0.6%
	Moderate	1	9.1%	\$50	4.3%	21.9%	1	9.1%	13.8%	\$50	4.3%	8.9%	0	0.0%	13.8%	\$0	0.0%	9.5%
	Middle	4	36.4%	\$315	27.3%	39.7%	4	36.4%	37.7%	\$315	27.3%	31.1%	0	0.0%	37.0%	\$0	0.0%	30.2%
	Upper	6	54.5%	\$787	68.3%	36.5%	6	54.5%	47.7%	\$787	68.3%	59.5%	0	0.0%	48.3%	\$0	0.0%	59.6%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	11	100.0%	\$1,152	100.0%	100.0%	11	100.0%	100.0%	\$1,152	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Tampa

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar				
		Count #	%	Dollar \$ (000s)	Dollar \$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	Agg \$ %				
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	1.4%	\$0	0.0%	1.1%	0	0.0%	0.7%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	21.9%	0	0.0%	16.5%	\$0	0.0%	10.6%	0	0.0%	16.4%	\$0	0.0%	8.9%
	Middle	1	50.0%	\$18	37.5%	39.7%	0	0.0%	38.9%	\$0	0.0%	28.8%	1	100.0%	38.1%	\$18	100.0%	25.8%
	Upper	1	50.0%	\$30	62.5%	36.5%	1	100.0%	43.1%	\$30	100.0%	59.5%	0	0.0%	44.7%	\$0	0.0%	64.8%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Total	2	100.0%	\$48	100.0%	100.0%	1	100.0%	100.0%	\$30	100.0%	100.0%	1	100.0%	100.0%	\$18	100.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	1.9%	0	0.0%	2.4%	\$0	0.0%	1.4%	0	0.0%	2.5%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	21.9%	0	0.0%	21.8%	\$0	0.0%	16.2%	0	0.0%	21.7%	\$0	0.0%	14.4%
	Middle	0	0.0%	\$0	0.0%	39.7%	0	0.0%	40.4%	\$0	0.0%	37.9%	0	0.0%	39.2%	\$0	0.0%	38.4%
	Upper	0	0.0%	\$0	0.0%	36.5%	0	0.0%	35.4%	\$0	0.0%	44.4%	0	0.0%	36.5%	\$0	0.0%	45.6%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	9	2.4%	\$1,458	1.6%	1.9%	4	2.0%	1.6%	\$651	1.4%	1.4%	5	2.9%	1.8%	\$807	1.7%	2.2%
	Moderate	68	18.2%	\$10,602	11.4%	21.9%	28	14.1%	18.2%	\$3,439	7.6%	13.3%	40	22.9%	17.8%	\$7,163	15.0%	14.2%
	Middle	124	33.2%	\$26,938	28.9%	39.7%	71	35.9%	38.9%	\$14,876	32.8%	34.8%	53	30.3%	38.4%	\$12,062	25.3%	33.1%
	Upper	172	46.1%	\$54,071	58.1%	36.5%	95	48.0%	41.3%	\$26,387	58.2%	50.4%	77	44.0%	41.9%	\$27,684	58.0%	50.4%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%
	Total	373	100.0%	\$93,069	100.0%	100.0%	198	100.0%	100.0%	\$45,353	100.0%	100.0%	175	100.0%	100.0%	\$47,716	100.0%	100.0%

Originations & Purchases
 2019 FFIEC Census Data and 2015 ACS Data

The geographic distribution of the bank’s HMDA-reportable loans reflects reasonable dispersion throughout the assessment area. The percentage of the bank’s total loans in low-income tracts (2.4 percent) for 2018 and 2019 exceeded both the demographic comparison (the percentage of owner-occupied housing units – 1.9 percent) and the aggregate comparison. In 2018, the bank’s total loans in low-income tracts (2.0 percent) exceeded aggregate lenders (1.6 percent). It appears that both the bank and the aggregate lenders may have had limited opportunity to lend in the low-income tracts, where only 1.9 percent of the owner-occupied housing units in the assessment area are located. Conversely, 58.5 percent of the housing units in low-income tracts are rental and 17.8 percent are vacant. In 2019, the bank’s total loans in low-income tracts (2.9 percent) also exceeded aggregate lenders (1.8 percent). In moderate-income tracts, the percentage of the bank’s loans (18.2 percent) was less than the demographic comparison (21.9 percent), but comparable to the aggregate comparison. In 2018, the bank’s total loans in moderate-income tracts (14.1 percent) was less than aggregate lenders (18.2 percent). However, in 2019, the bank’s total loans in moderate-income tracts (22.9 percent) exceeded aggregate lenders (17.8 percent). The overall geographic distribution of HMDA-reportable loans is considered reasonable given market conditions and performance context.

Small Business Lending

The following table shows the geographic distribution of small business loans as a percentage of the bank’s total number of loans by type within the Tampa assessment area for 2018 and 2019.

Geographic Distribution of Small Business Loans

Assessment Area: Tampa

Tract Income Levels	Bank Lending & Demographic Data Comparison				
	2018, 2019				
	Count		Bank Dollar		Total Businesses
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	4.1%
Moderate	7	17.1%	\$1,348	12.6%	21.5%
Middle	13	31.7%	\$3,653	34.2%	35.6%
Upper	21	51.2%	\$5,688	53.2%	38.5%
Unknown	0	0.0%	\$0	0.0%	0.3%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>41</i>	<i>100.0%</i>	<i>\$10,689</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2019 FFIEC Census Data and 2019 D&B Information

The geographic distribution of small business loans reflects reasonable dispersion throughout the assessment area. While the bank did not originate small business loans in low-income tracts, the bank originated 17.1 percent of small business loans in moderate-income tracts which was slightly less than the percentage of total businesses located in these tracts at 21.5 percent. The overall geographic distribution of small business lending is considered reasonable given market conditions and performance context.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

Based on the following analysis, the overall borrower distribution of the bank’s HMDA-reportable and small business loans reflects reasonable penetration among individuals of different income levels and businesses of different revenue sizes. The bank’s HMDA-reportable and small business lending performance was compared to available demographic information. For HMDA-reportable lending, the 2018 and 2019 lending data was also compared to the aggregate performance of lenders in the assessment area. Performance context issues were also taken into consideration.

Residential Real Estate (HMDA) Lending

The following tables show the distribution of the bank's HMDA-reportable loans by the income level of the borrowers.

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Tampa

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2018, 2019					2018						2019					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count #	%	Dollar \$(000s)	%		Bank #	Agg %	Dollar \$ (000s)	%	Agg \$ %	Bank #	Agg %	Dollar \$(000s)	%	Agg \$ %		
HOME PURCHASE	Low	13	5.1%	\$1,601	2.3%	21.6%	7	5.4%	3.9%	\$776	2.2%	2.0%	6	4.8%	4.4%	\$825	2.5%	2.2%
	Moderate	50	19.7%	\$7,568	11.1%	17.9%	29	22.3%	16.3%	\$4,305	12.1%	10.8%	21	16.9%	17.6%	\$3,263	10.0%	11.7%
	Middle	57	22.4%	\$11,626	17.1%	19.1%	28	21.5%	20.4%	\$5,915	16.6%	17.4%	29	23.4%	22.3%	\$5,711	17.5%	18.9%
	Upper	133	52.4%	\$44,796	65.7%	41.4%	65	50.0%	42.0%	\$22,027	61.9%	54.3%	68	54.8%	41.4%	\$22,769	69.9%	53.8%
	Unknown	1	0.4%	\$2,567	3.8%	0.0%	1	0.8%	17.3%	\$2,567	7.2%	15.5%	0	0.0%	14.4%	\$0	0.0%	13.4%
	<i>Total</i>	<i>254</i>	<i>100.0%</i>	<i>\$68,158</i>	<i>100.0%</i>	<i>100.0%</i>	<i>130</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$35,590</i>	<i>100.0%</i>	<i>100.0%</i>	<i>124</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$32,568</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	4	4.9%	\$393	1.8%	21.6%	2	6.3%	7.8%	\$189	2.9%	4.3%	2	4.0%	5.7%	\$204	1.3%	2.9%
	Moderate	9	11.0%	\$1,374	6.3%	17.9%	3	9.4%	17.6%	\$327	5.0%	12.1%	6	12.0%	13.6%	\$1,047	6.9%	8.6%
	Middle	18	22.0%	\$3,687	17.0%	19.1%	10	31.3%	20.6%	\$1,843	28.3%	17.6%	8	16.0%	18.4%	\$1,844	12.2%	14.7%
	Upper	43	52.4%	\$14,222	65.7%	41.4%	16	50.0%	40.5%	\$4,002	61.4%	52.3%	27	54.0%	38.8%	\$10,220	67.5%	47.5%
	Unknown	8	9.8%	\$1,976	9.1%	0.0%	1	3.1%	13.5%	\$161	2.5%	13.8%	7	14.0%	23.5%	\$1,815	12.0%	26.3%
	<i>Total</i>	<i>82</i>	<i>100.0%</i>	<i>\$21,652</i>	<i>100.0%</i>	<i>100.0%</i>	<i>32</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,522</i>	<i>100.0%</i>	<i>100.0%</i>	<i>50</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$15,130</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	4.2%	\$15	0.7%	21.6%	1	4.2%	6.1%	\$15	0.7%	3.6%	0	0.0%	6.3%	\$0	0.0%	3.8%
	Moderate	4	16.7%	\$143	6.9%	17.9%	4	16.7%	15.7%	\$143	6.9%	11.0%	0	0.0%	15.5%	\$0	0.0%	10.7%
	Middle	2	8.3%	\$100	4.9%	19.1%	2	8.3%	20.1%	\$100	4.9%	16.2%	0	0.0%	22.0%	\$0	0.0%	17.8%
	Upper	16	66.7%	\$1,701	82.6%	41.4%	16	66.7%	53.7%	\$1,701	82.6%	62.4%	0	0.0%	53.7%	\$0	0.0%	64.1%
	Unknown	1	4.2%	\$100	4.9%	0.0%	1	4.2%	4.4%	\$100	4.9%	6.8%	0	0.0%	2.5%	\$0	0.0%	3.5%
	<i>Total</i>	<i>24</i>	<i>100.0%</i>	<i>\$2,059</i>	<i>100.0%</i>	<i>100.0%</i>	<i>24</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,059</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	2.9%	\$0	0.0%	0.2%	0	0.0%	1.6%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	97.1%	\$0	0.0%	99.8%	0	0.0%	98.4%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	6.7%	\$0	0.0%	4.1%	0	0.0%	6.7%	\$0	0.0%	3.6%
	Moderate	2	18.2%	\$90	7.8%	17.9%	2	18.2%	16.2%	\$90	7.8%	9.8%	0	0.0%	14.6%	\$0	0.0%	8.8%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	21.3%	\$0	0.0%	14.4%	0	0.0%	22.5%	\$0	0.0%	16.4%
	Upper	8	72.7%	\$1,012	87.8%	41.4%	8	72.7%	53.9%	\$1,012	87.8%	70.1%	0	0.0%	54.5%	\$0	0.0%	69.7%
	Unknown	1	9.1%	\$50	4.3%	0.0%	1	9.1%	1.9%	\$50	4.3%	1.6%	0	0.0%	1.6%	\$0	0.0%	1.5%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$1,152</i>	<i>100.0%</i>	<i>100.0%</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,152</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
 2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Tampa

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	Bank	Agg	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	9.5%	\$0	0.0%	5.0%	0	0.0%	8.6%	\$0	0.0%	3.9%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	14.9%	\$0	0.0%	8.4%	0	0.0%	17.6%	\$0	0.0%	9.1%
	Middle	1	50.0%	\$18	37.5%	19.1%	0	0.0%	20.7%	\$0	0.0%	12.3%	1	100.0%	21.8%	\$18	100.0%	13.1%
	Upper	1	50.0%	\$30	62.5%	41.4%	1	100.0%	47.0%	\$30	100.0%	67.6%	0	0.0%	46.0%	\$0	0.0%	60.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.9%	\$0	0.0%	6.6%	0	0.0%	6.1%	\$0	0.0%	13.0%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$48</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18</i>	<i>100.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	0.6%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	2.0%	\$0	0.0%	1.0%	0	0.0%	1.1%	\$0	0.0%	0.9%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	2.0%	\$0	0.0%	1.3%	0	0.0%	1.7%	\$0	0.0%	1.9%
	Upper	0	0.0%	\$0	0.0%	41.4%	0	0.0%	3.4%	\$0	0.0%	2.4%	0	0.0%	2.9%	\$0	0.0%	5.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	92.2%	\$0	0.0%	94.9%	0	0.0%	93.8%	\$0	0.0%	91.1%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	18	4.8%	\$2,009	2.2%	21.6%	10	5.1%	5.0%	\$980	2.2%	2.3%	8	4.6%	5.0%	\$1,029	2.2%	2.3%
	Moderate	65	17.4%	\$9,175	9.9%	17.9%	38	19.2%	16.1%	\$4,865	10.7%	9.8%	27	15.4%	16.0%	\$4,310	9.0%	9.9%
	Middle	78	20.9%	\$15,431	16.6%	19.1%	40	20.2%	19.9%	\$7,858	17.3%	15.3%	38	21.7%	20.9%	\$7,573	15.9%	16.1%
	Upper	201	53.9%	\$61,761	66.4%	41.4%	106	53.5%	41.8%	\$28,772	63.4%	48.3%	95	54.3%	41.2%	\$32,989	69.1%	48.1%
	Unknown	11	2.9%	\$4,693	5.0%	0.0%	4	2.0%	17.3%	\$2,878	6.3%	24.3%	7	4.0%	17.0%	\$1,815	3.8%	23.7%
	<i>Total</i>	<i>373</i>	<i>100.0%</i>	<i>\$93,069</i>	<i>100.0%</i>	<i>100.0%</i>	<i>198</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$45,353</i>	<i>100.0%</i>	<i>100.0%</i>	<i>175</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$47,716</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
 2019 FFIEC Census Data and 2015 ACS Data

The distribution of HMDA-reportable lending by borrower income is reasonable when compared to the demographic characteristics of the assessment area and to the performance of the aggregate lenders. The bank's HMDA-reportable lending to low-income borrowers of 4.8 percent was less than the percentage of low-income families in the assessment area at 21.6 percent. However, the bank's lending to low-income borrowers at 5.1 percent and 4.6 percent for 2018 and 2019, respectively, was comparable to aggregate lenders at 5.0 percent. The bank originated 17.4 percent of HMDA-reportable loans to moderate-income borrowers, which was comparable to the percentage of moderate-income families in the assessment area at 17.9 percent and slightly greater than aggregate lenders in 2018 at 16.1 percent and comparable to aggregate lenders in 2019 at 16.0 percent.

Small Business Lending:

The following table shows, by loan size, the number and dollar volume of small business loans originated by First Home Bank.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Tampa

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2018, 2019				
		Bank				Total Businesses
		Count		\$ (000s)		
#	%	\$	%	%		
BUSINESS REVENUE	\$1million or Less	28	68.3%	\$7,586	71.0%	93.5%
	Over \$1 Million	13	31.7%	\$3,102	29.0%	5.7%
	<i>Total Rev. available</i>	41	100.0%	\$10,689	100.0%	99.2%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.8%
	<i>Total</i>	41	100.0%	\$10,689	100.0%	100.0%
LOAN SIZE	\$100,000 or Less	17	41.5%	\$1,058	9.9%	
	\$100,001 - \$250,000	10	24.4%	\$1,776	16.6%	
	\$250,001 - \$1 Million	14	34.1%	\$7,855	73.5%	
	<i>Total</i>	41	100.0%	\$10,689	100.0%	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	12	42.9%	\$754	9.9%	
	\$100,001 - \$250,000	6	21.4%	\$1,010	13.3%	
	\$250,001 - \$1 Million	10	35.7%	\$5,823	76.7%	
	<i>Total</i>	28	100.0%	\$7,586	100.0%	

Originations & Purchases
2019 FFIEC Census Data and 2019 D&B Information

From 2018 through 2019, of the 41 loans inside the assessment area, 28 (68.3 percent) were originated to businesses with gross annual revenues of \$1 million or less. While this is below the percentage of total businesses in this revenue size category at 93.5 percent, the performance is reasonable given market conditions and performance context. Furthermore, 27 of the 41 total loans (65.9 percent) were in amounts of \$250,000 or less, which typically represents the loan amounts requested by small businesses, and demonstrates the bank's willingness to make small dollar loans that help meet the credit needs of businesses in the community.

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

The following assessment area was reviewed using limited-scope examination procedures. Through these procedures, conclusions regarding the institution’s CRA performance are drawn from a review of available facts and data, including performance and demographic information. Performance in this assessment area did not change the bank’s overall rating. Please refer to the tables in Appendix D for additional information regarding this assessment area.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE SARASOTA MSA, FLORIDA
ASSESSMENT AREA**

As previously stated, the bank’s assessment areas have changed since the previous examination. The Sarasota branch was previously an LPO, which converted to a full-service branch effective October 29, 2018. The assessment area consists of Manatee and Sarasota counties, which make up the Sarasota MSA. First Home Bank operates one branch in a moderate-income census tract in this assessment area. The Sarasota assessment area accounts for approximately 42.9 percent of the bank’s loan volume. According to the FDIC Deposit Market Share Report, as of June 30, 2019, the bank had total deposits of \$53.8 million. With a deposit market share of 0.2 percent, First Home Bank was ranked 29th out of 36 financial institutions that operated in the assessment area. Bank of America, NA had the greatest deposit market share at 19.9 percent.

According to 2019 FFIEC census data, of the 174 census tracts in the assessment area, 4 (2.3 percent) are low-income; 43 (24.7 percent) are moderate-income; 79 (45.4 percent) are middle-income; and 46 (26.4 percent) are upper-income and 2 (1.1 percent) have unknown income designations. Of the 194,874 families in the assessment area, 19.4 percent are low-income, and 19.1 percent are moderate-income. In addition, 40.4 percent of families in low-income tracts and 15.6 percent of families in moderate-income tracts have incomes that fall below the poverty level. Of total businesses in the assessment area, 94.0 percent have total annual revenues of \$1 million or less and are therefore considered to be small businesses.

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

Performance in the Limited-Scope Review Metropolitan Assessment Areas	
Assessment Area	Lending Test
Sarasota	Consistent

The limited-scope review revealed the bank’s CRA performance in the Sarasota assessment area is consistent with performance in the Tampa full-scope assessment area and the institution’s overall performance. The loan to deposit ratio, geographic distribution, and lending to borrowers of different incomes and businesses of different sizes were all considered reasonable in the Sarasota assessment area. Additionally, the bank’s assessment area concentration in Sarasota was consistent with performance in the Tampa full-scope assessment area.

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

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED January 1, 2018 to December 31, 2019			
FINANCIAL INSTITUTION First Home Bank, St. Petersburg, Florida		PRODUCTS REVIEWED HMDA-reportable loans Small business loans	
AFFILIATE(S) N/A	AFFILIATE RELATIONSHIP N/A	PRODUCTS REVIEWED N/A	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
<i>ASSESSMENT AREA</i>	<i>TYPE OF EXAMINATION</i>	<i>BRANCHES VISITED</i>	<i>OTHER INFORMATION</i>
Tampa MSA; Pinellas, Hillsborough, Pasco, and Hernando counties	Full-scope Review	N/A	N/A
Sarasota MSA; Manatee and Sarasota counties	Limited-scope Review	N/A	N/A

APPENDIX B – DEFINITIONS AND GENERAL INFORMATION

Definitions

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

Rounding Convention

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

General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of First Home Bank prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of April 19, 2021. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX C – GLOSSARY

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

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

Community development: All Agencies have adopted the following language. Affordable housing (including multi-family rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

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

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

APPENDIX C – GLOSSARY (Continued)

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

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

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

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

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

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

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

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

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

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

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

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Call Report and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

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

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

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE
ASSESSMENT AREAS

Combined Demographics Report

Assessment Area: FL Sarasota

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	2.3	3,985	2	1,609	40.4	37,816	19.4
Moderate-income	43	24.7	40,142	20.6	6,281	15.6	37,216	19.1
Middle-income	79	45.4	94,159	48.3	6,073	6.4	40,920	21
Upper-income	46	26.4	56,588	29	2,458	4.3	78,922	40.5
Unknown-income	2	1.1	0	0	0	0	0	0
Total Assessment Area	174	100.0	194,874	100.0	16,421	8.4	194,874	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,369	2,319	1	31.5	3,924	53.3	1,126	15.3
Moderate-income	91,418	40,715	18.3	44.5	29,679	32.5	21,024	23
Middle-income	193,422	112,636	50.7	58.2	38,420	19.9	42,366	21.9
Upper-income	114,987	66,323	29.9	57.7	15,894	13.8	32,770	28.5
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	407,196	221,993	100.0	54.5	87,917	21.6	97,286	23.9
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	817	1.4	753	1.4	61	2	3	0.7
Moderate-income	11,476	19.6	10,735	19.5	677	21.9	64	15.1
Middle-income	26,910	46	25,444	46.3	1,321	42.7	145	34.2
Upper-income	19,305	33	18,059	32.8	1,034	33.4	212	50
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	58,508	100.0	54,991	100.0	3,093	100.0	424	100.0
Percentage of Total Businesses:			94.0		5.3		.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	65	12.1	62	12.1	3	10.7	0	0
Middle-income	176	32.7	171	33.5	5	17.9	0	0
Upper-income	298	55.3	278	54.4	20	71.4	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	539	100.0	511	100.0	28	100.0	0	.0
Percentage of Total Farms:			94.8		5.2		.0	

2019 FFIEC Census Data and 2019 D&B Information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Sarasota

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Bank		Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	\$ (000s)	\$ %	\$ %	Bank #	Agg %	\$ (000s)	\$ %	Agg \$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.6%	\$0	0.0%	0.3%	0	0.0%	0.6%	\$0	0.0%	0.3%
	Moderate	12	6.0%	\$3,552	4.8%	18.3%	4	3.9%	13.7%	\$798	2.1%	9.8%	8	8.2%	14.7%	\$2,754	7.7%	10.7%
	Middle	72	36.0%	\$22,585	30.6%	50.7%	31	30.1%	44.6%	\$11,129	29.4%	38.9%	41	42.3%	43.6%	\$11,456	31.8%	38.0%
	Upper	116	58.0%	\$47,736	64.6%	29.9%	68	66.0%	41.1%	\$25,975	68.5%	51.0%	48	49.5%	41.1%	\$21,761	60.5%	50.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>200</i>	<i>100.0%</i>	<i>\$73,873</i>	<i>100.0%</i>	<i>100.0%</i>	<i>103</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$37,902</i>	<i>100.0%</i>	<i>100.0%</i>	<i>97</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$35,971</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.5%	\$0	0.0%	0.2%	0	0.0%	0.4%	\$0	0.0%	0.2%
	Moderate	17	17.5%	\$2,644	9.4%	18.3%	9	22.5%	14.8%	\$1,292	12.3%	10.6%	8	14.0%	12.3%	\$1,352	7.6%	8.7%
	Middle	30	30.9%	\$7,332	25.9%	50.7%	17	42.5%	52.4%	\$4,343	41.3%	44.8%	13	22.8%	48.9%	\$2,989	16.8%	40.7%
	Upper	50	51.5%	\$18,291	64.7%	29.9%	14	35.0%	32.3%	\$4,882	46.4%	44.3%	36	63.2%	38.4%	\$13,409	75.5%	50.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>97</i>	<i>100.0%</i>	<i>\$28,267</i>	<i>100.0%</i>	<i>100.0%</i>	<i>40</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,517</i>	<i>100.0%</i>	<i>100.0%</i>	<i>57</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,750</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.4%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	12.2%	\$0	0.0%	10.3%	0	0.0%	12.0%	\$0	0.0%	10.2%
	Middle	0	0.0%	\$0	0.0%	50.7%	0	0.0%	52.1%	\$0	0.0%	43.2%	0	0.0%	50.3%	\$0	0.0%	42.7%
	Upper	0	0.0%	\$0	0.0%	29.9%	0	0.0%	35.4%	\$0	0.0%	46.2%	0	0.0%	37.3%	\$0	0.0%	47.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	1.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	22.8%	0	0.0%	22.9%	\$0	0.0%	5.3%	0	0.0%	44.2%	\$0	0.0%	17.8%
	Middle	0	0.0%	\$0	0.0%	39.5%	0	0.0%	51.4%	\$0	0.0%	66.7%	0	0.0%	42.3%	\$0	0.0%	46.9%
	Upper	0	0.0%	\$0	0.0%	36.1%	0	0.0%	25.7%	\$0	0.0%	28.0%	0	0.0%	11.5%	\$0	0.0%	34.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	10.1%	\$0	0.0%	6.3%	0	0.0%	10.0%	\$0	0.0%	6.9%
	Middle	0	0.0%	\$0	0.0%	50.7%	0	0.0%	46.0%	\$0	0.0%	38.2%	0	0.0%	46.5%	\$0	0.0%	35.6%
	Upper	0	0.0%	\$0	0.0%	29.9%	0	0.0%	43.8%	\$0	0.0%	55.5%	0	0.0%	43.4%	\$0	0.0%	57.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Sarasota

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2018, 2019					2018					2019						
		Bank		Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.6%	\$0	0.0%	0.1%	0	0.0%	0.4%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	11.9%	\$0	0.0%	6.3%	0	0.0%	13.0%	\$0	0.0%	5.0%
	Middle	0	0.0%	\$0	0.0%	50.7%	0	0.0%	44.8%	\$0	0.0%	28.3%	0	0.0%	45.9%	\$0	0.0%	29.7%
	Upper	0	0.0%	\$0	0.0%	29.9%	0	0.0%	42.6%	\$0	0.0%	65.2%	0	0.0%	40.7%	\$0	0.0%	65.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	1.7%	\$0	0.0%	1.2%	0	0.0%	2.3%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	18.9%	\$0	0.0%	13.7%	0	0.0%	16.5%	\$0	0.0%	9.2%
	Middle	0	0.0%	\$0	0.0%	50.7%	0	0.0%	52.6%	\$0	0.0%	46.9%	0	0.0%	48.9%	\$0	0.0%	40.5%
	Upper	0	0.0%	\$0	0.0%	29.9%	0	0.0%	26.8%	\$0	0.0%	38.2%	0	0.0%	32.4%	\$0	0.0%	49.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.0%	0	0.0%	0.6%	\$0	0.0%	0.3%	0	0.0%	0.5%	\$0	0.0%	0.3%
	Moderate	29	9.8%	\$6,196	6.1%	18.3%	13	9.1%	13.7%	\$2,090	4.3%	9.6%	16	10.4%	13.8%	\$4,106	7.6%	10.5%
	Middle	102	34.3%	\$29,917	29.3%	50.7%	48	33.6%	46.9%	\$15,472	32.0%	41.7%	54	35.1%	45.6%	\$14,445	26.9%	39.3%
	Upper	166	55.9%	\$66,027	64.6%	29.9%	82	57.3%	38.9%	\$30,857	63.7%	48.4%	84	54.5%	40.1%	\$35,170	65.5%	49.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>297</i>	<i>100.0%</i>	<i>\$102,140</i>	<i>100.0%</i>	<i>100.0%</i>	<i>143</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$48,419</i>	<i>100.0%</i>	<i>100.0%</i>	<i>154</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$53,721</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
 2019 FFIEC Census Data and 2015 ACS Data

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Sarasota

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2018, 2019					Bank & Aggregate Lending Comparison											
		2018, 2019				Families by Family Income %	2018						2019					
		Bank		Dollar			Count		Dollar				Count		Dollar			
		Count #	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		
HOME PURCHASE	Low	3	1.5%	\$467	0.6%	19.4%	1	1.0%	4.2%	\$145	0.4%	2.2%	2	2.1%	3.9%	\$322	0.9%	2.0%
	Moderate	16	8.0%	\$2,955	4.0%	19.1%	9	8.7%	15.7%	\$1,416	3.7%	10.6%	7	7.2%	16.1%	\$1,539	4.3%	10.7%
	Middle	35	17.5%	\$8,488	11.5%	21.0%	19	18.4%	21.3%	\$4,288	11.3%	17.5%	16	16.5%	21.9%	\$4,200	11.7%	18.1%
	Upper	145	72.5%	\$61,643	83.4%	40.5%	73	70.9%	46.2%	\$31,733	83.7%	58.1%	72	74.2%	48.1%	\$29,910	83.2%	59.4%
	Unknown	1	0.5%	\$320	0.4%	0.0%	1	1.0%	12.6%	\$320	0.8%	11.7%	0	0.0%	9.9%	\$0	0.0%	9.9%
	<i>Total</i>	<i>200</i>	<i>100.0%</i>	<i>\$73,873</i>	<i>100.0%</i>	<i>100.0%</i>	<i>103</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$37,902</i>	<i>100.0%</i>	<i>100.0%</i>	<i>97</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$35,971</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	4	4.1%	\$496	1.8%	19.4%	4	10.0%	10.0%	\$496	4.7%	5.5%	0	0.0%	6.1%	\$0	0.0%	3.1%
	Moderate	16	16.5%	\$2,823	10.0%	19.1%	4	10.0%	20.5%	\$605	5.8%	14.3%	12	21.1%	15.3%	\$2,218	12.5%	9.4%
	Middle	14	14.4%	\$2,898	10.3%	21.0%	8	20.0%	22.5%	\$1,295	12.3%	19.0%	6	10.5%	19.5%	\$1,603	9.0%	15.2%
	Upper	61	62.9%	\$21,402	75.7%	40.5%	23	57.5%	35.6%	\$7,886	75.0%	49.4%	38	66.7%	40.0%	\$13,516	76.1%	51.3%
	Unknown	2	2.1%	\$648	2.3%	0.0%	1	2.5%	11.4%	\$235	2.2%	11.8%	1	1.8%	19.1%	\$413	2.3%	21.0%
	<i>Total</i>	<i>97</i>	<i>100.0%</i>	<i>\$28,267</i>	<i>100.0%</i>	<i>100.0%</i>	<i>40</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,517</i>	<i>100.0%</i>	<i>100.0%</i>	<i>57</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,750</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	19.4%	0	0.0%	6.5%	\$0	0.0%	3.6%	0	0.0%	7.2%	\$0	0.0%	4.7%
	Moderate	0	0.0%	\$0	0.0%	19.1%	0	0.0%	17.8%	\$0	0.0%	11.7%	0	0.0%	14.8%	\$0	0.0%	10.4%
	Middle	0	0.0%	\$0	0.0%	21.0%	0	0.0%	23.4%	\$0	0.0%	19.0%	0	0.0%	25.9%	\$0	0.0%	18.9%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	48.8%	\$0	0.0%	58.9%	0	0.0%	49.4%	\$0	0.0%	61.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.4%	\$0	0.0%	6.8%	0	0.0%	2.8%	\$0	0.0%	4.3%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	19.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	0.2%
	Middle	0	0.0%	\$0	0.0%	21.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	0.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	96.2%	\$0	0.0%	99.7%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	19.4%	0	0.0%	6.6%	\$0	0.0%	3.3%	0	0.0%	5.1%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	19.1%	0	0.0%	17.2%	\$0	0.0%	10.7%	0	0.0%	16.6%	\$0	0.0%	9.6%
	Middle	0	0.0%	\$0	0.0%	21.0%	0	0.0%	24.5%	\$0	0.0%	18.4%	0	0.0%	24.4%	\$0	0.0%	16.2%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	50.4%	\$0	0.0%	66.5%	0	0.0%	52.0%	\$0	0.0%	70.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.2%	\$0	0.0%	1.0%	0	0.0%	1.9%	\$0	0.0%	1.4%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Sarasota

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2018, 2019					Bank & Aggregate Lending Comparison											
		2018, 2019				Families by Family Income %	2018			2019								
		Bank		Dollar			Count		Dollar		Count		Dollar					
		Count #	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	Agg \$ %				
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	19.4%	0	0.0%	11.5%	\$0	0.0%	5.4%	0	0.0%	8.3%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	19.1%	0	0.0%	17.1%	\$0	0.0%	8.4%	0	0.0%	14.8%	\$0	0.0%	6.1%
	Middle	0	0.0%	\$0	0.0%	21.0%	0	0.0%	17.3%	\$0	0.0%	9.4%	0	0.0%	21.5%	\$0	0.0%	11.3%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	48.7%	\$0	0.0%	69.3%	0	0.0%	50.7%	\$0	0.0%	75.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.4%	\$0	0.0%	7.5%	0	0.0%	4.8%	\$0	0.0%	4.4%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	19.4%	0	0.0%	1.4%	\$0	0.0%	1.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.1%	0	0.0%	1.9%	\$0	0.0%	1.0%	0	0.0%	0.3%	\$0	0.0%	0.2%
	Middle	0	0.0%	\$0	0.0%	21.0%	0	0.0%	3.4%	\$0	0.0%	1.8%	0	0.0%	0.3%	\$0	0.0%	0.4%
	Upper	0	0.0%	\$0	0.0%	40.5%	0	0.0%	3.8%	\$0	0.0%	3.3%	0	0.0%	2.3%	\$0	0.0%	3.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	89.5%	\$0	0.0%	92.9%	0	0.0%	97.2%	\$0	0.0%	95.5%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	7	2.4%	\$963	0.9%	19.4%	5	3.5%	5.7%	\$641	1.3%	2.7%	2	1.3%	4.8%	\$322	0.6%	2.2%
	Moderate	32	10.8%	\$5,778	5.7%	19.1%	13	9.1%	16.6%	\$2,021	4.2%	10.4%	19	12.3%	15.7%	\$3,757	7.0%	9.5%
	Middle	49	16.5%	\$11,386	11.1%	21.0%	27	18.9%	21.5%	\$5,583	11.5%	16.4%	22	14.3%	21.3%	\$5,803	10.8%	15.9%
	Upper	206	69.4%	\$83,045	81.3%	40.5%	96	67.1%	43.7%	\$39,619	81.8%	52.6%	110	71.4%	45.6%	\$43,426	80.8%	53.4%
	Unknown	3	1.0%	\$968	0.9%	0.0%	2	1.4%	12.5%	\$555	1.1%	17.9%	1	0.6%	12.6%	\$413	0.8%	19.0%
	<i>Total</i>	<i>297</i>	<i>100.0%</i>	<i>\$102,140</i>	<i>100.0%</i>	<i>100.0%</i>	<i>143</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$48,419</i>	<i>100.0%</i>	<i>100.0%</i>	<i>154</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$53,721</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business Loans

Assessment Area: Sarasota

Tract Income Levels	Bank Lending & Demographic Data Comparison 2018, 2019				
	Bank				Total Businesses %
	Count		Dollar		
	#	%	\$ (000s)	\$ %	
Low	0	0.0%	\$0	0.0%	1.4%
Moderate	1	7.1%	\$100	2.3%	19.6%
Middle	3	21.4%	\$445	10.1%	46.0%
Upper	10	71.4%	\$3,874	87.7%	33.0%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>\$4,419</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2019 FFIEC Census Data and 2019 D&B Information

APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (Continued)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Sarasota

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2018, 2019				
		Bank				Total Businesses
		Count		\$ (000s)		%
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	7	50.0%	\$1,689	38.2%	94.0%
	Over \$1 Million	7	50.0%	\$2,730	61.8%	5.3%
	<i>Total Rev. available</i>	14	100.0%	\$4,419	100.0%	99.3%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.7%
	<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>\$4,419</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	5	35.7%	\$290	6.6%	
	\$100,001 - \$250,000	3	21.4%	\$460	10.4%	
	\$250,001 - \$1 Million	6	42.9%	\$3,669	83.0%	
	<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>\$4,419</i>	<i>100.0%</i>	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	3	42.9%	\$150	8.9%	
	\$100,001 - \$250,000	2	28.6%	\$275	16.3%	
	\$250,001 - \$1 Million	2	28.6%	\$1,264	74.8%	
	<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>\$1,689</i>	<i>100.0%</i>	

Originations & Purchases
2019 FFIEC Census Data and 2019 D&B Information