



## **PUBLIC DISCLOSURE**

October 21, 2024

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

BankUnited, National Association  
Charter Number: 25028

14817 Oak Lane  
Miami Lakes, FL 33016

Office of the Comptroller of the Currency

400 7th Street SW  
Washington, D.C. 20219

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

## Table of Contents

Overall CRA Rating.....	3
Description of Institution.....	4
Scope of the Evaluation.....	4
Discriminatory or Other Illegal Credit Practices Review.....	9
State Rating.....	10
State of Florida.....	10
State of New York.....	24
State of Texas.....	35
Appendix A: Scope of Examination.....	Appendix A
Appendix B: Summary of State Ratings.....	Appendix B
Appendix C: Definitions and Common Abbreviations.....	Appendix C
Appendix D: Tables of Performance Data.....	Appendix D

## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**

The following table indicates the performance level of **BankUnited, N.A. (BKU or bank)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	BankUnited Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			
*The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.			

The major factors that support this rating include:

- The Lending Test rating is based on good performance in the states of Florida and New York and excellent performance in the state of Texas..
- The Investment Test rating is based on excellent performance in the states of Florida, New York, and Texas.
- The Service Test rating is based on adequate performance in the states of Florida, New York, and Texas.
- The overall conclusions are a weighted average, based on deposits, with performance in the Miami Combined Statistical Area (CSA) and New York Metropolitan Statistical Area (MSA) carrying the greatest weight.

### Lending in Assessment Area

An adequate percentage of the bank's loans are in its assessment areas (AAs).

The bank originated and purchased 20.3 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA, This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,442	8.6	15,330	91.4	16,772	865,221	12.1	6,273,876	87.9	7,139,097
Small Business	2,562	86.5	401	13.5	2,963	526,273	82.5	111,289	17.5	637,562
Total	4,004	20.3	15,731	79.7	19,735	1,391,494	17.9	6,385,165	82.1	7,776,659

## Description of Institution

BKU is a multistate financial institution headquartered in Miami Lakes, Florida. The bank is a wholly-owned subsidiary of BankUnited, Inc, a single-bank holding company. BKU's three rating areas are the states of Florida, New York, and Texas. Since the previous CRA evaluation, dated October 4, 2021, the bank grew organically to \$35.7 billion in assets as of December 31, 2023. In April 2022, the bank expanded its geographic footprint into the Texas market with the opening of one full-service branch in Dallas County, taking the full county as its assessment area. Its entry into this market was to support the National Deposit Group business line while supporting compliance with applicable state of Texas deposit-taking requirements.

As of December 31, 2023, the bank reported total loans of \$24.6 billion, or 68.9 percent of total assets. Real estate balances comprised most of the loan total at 63.0 percent, while commercial and other loans represented 20.9 percent and 16.1 percent, respectively. BKU also reported total deposits of \$26.8 billion and tier one capital of \$3.3 billion.

The bank provides a full range of commercial lending and both commercial and consumer deposit services through 58 banking centers located in the state of Florida (53), the New York metropolitan area (4), and Dallas, Texas (1). The bank also provides commercial lending and deposit products through national platforms and consumer deposit products through an online channel. During the evaluation period, BKU opened two branches and closed 14. None of the branches opened were in low- or moderate-income Census Tracts (CTs). Four of the branches closed were located in moderate-income CTs and one in a low-income CT.

There were no known legal, financial, or other factors impeding the bank's ability to meet the credit needs in its AAs. The bank received a Satisfactory rating in its previous CRA evaluation dated October 4, 2021.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

BKU's evaluation period is January 1, 2021, through December 31, 2023. The OCC used this evaluation period to conduct analysis and form conclusions for all performance tests associated with this performance evaluation i.e., Lending, Investment and Service Test. Examiners considered qualifying activities performed in response to the COVID-19 pandemic across the United States during the evaluation period. In evaluating home mortgage loans reported in compliance with the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under the CRA, the OCC separated data into two analysis periods (2021 and 2022-2023) due to the 2020 U.S. Census demographic changes that took effect January 1, 2022. Loans originated or purchased from January 1, 2021, to December 31, 2021, were analyzed using

2015 American Community Survey (ACS) data, and loans originated or purchased from January 1, 2022, to December 31, 2023, were analyzed using 2020 U.S. Census data.

### **Selection of Areas for Full-Scope Review**

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

### **Ratings**

The bank’s overall rating is a blend of the state ratings. The state of Florida received the greatest weight in our analysis. Weight was determined considering the bank’s deposit volume, branch presence, and loan value in each state relative to the bank as a whole. The state of Florida accounted for 75.1 percent of deposits, 78.5 percent of lending activity, and 91.4 of the bank’s branch network. The state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Description of Factors Considered Under Each Performance Test**

### **Lending Test**

#### *Loan Products Evaluated*

The OCC evaluated home mortgage and small loans to businesses in each AA. The bank originated and purchased fewer than 20 loans in the North Port and Dallas MSAs during the 2022-23 period, which resulted in the level of loans not being sufficient to provide meaningful analysis. The OCC determined that 20 loans originated and purchased within an AA is sufficient for analysis purposes. Additionally, the bank did not originate any small loans to farms during the evaluation period; therefore, they were not part of the analysis or considered in the rating.

The analysis included both the number and dollar volume of lending. The analysis of lending, except for CD loans, emphasized the number of loans rather than the dollar volume because it is a better indicator of the number of individuals or businesses served. In AAs where examiners identified differences in performance between loan products, examiners evaluated the products based on the loan mix by number of loans specific to the AA over the evaluation period. Weighting of loan products in determining the bank's performance is described within the narrative comments of each rating area.

The Bank does not originate home mortgage loans, but it purchases home mortgage loans originated through community partners and correspondent channels. The bank’s residential loan portfolio is primarily comprised of loans purchased on a national basis through correspondent channels. In reviewing HMDA lending, 20 loans per year per assessment area were reviewed due to the bank not being a HMDA reporter.

### *Lending Activity*

For all rating areas, the bank's lending activity was evaluated by measuring the volume of the bank's lending compared to its size and resources in its AAs.

Examiners compared the market share percentage and rank for deposits to market share percentage and rank for all applicable loan products in the bank's AAs. The bank's market rank was divided by the total number of depository institutions or lenders. This approach takes into consideration the difference between the number of insured depository institutions and the number of home mortgage and small business lenders in the AA. Examiners leveraged the Federal Deposit Insurance Company (FDIC) Deposit Market Share reports to determine the bank's deposit market share and rank for AAs in which the bank operated a licensed branch.

### *Loan Distribution Analysis*

Loan distribution analysis compared home mortgage loans and small loans to businesses to demographic and aggregate lending data under the applicable Lending Test components. Demographic data is used to determine the reasonableness of a bank's distribution of loans among borrowers of different incomes and across geographies of different income levels. Aggregate data illustrates how the bank's lending performs relative to other lenders in the AA and provides context on the reasonableness of the bank's performance.

Lending performance in the 2021 and the 2022-2023 analysis periods are used together to conclude on the bank's lending performance for the entire evaluation period.

### *Geographic and Borrower Distribution*

Equal weighting was given to the geographic and borrower distribution components of the Lending Test unless performance context factors indicated one component should be considered more than the other.

For the analysis of the bank's geographic distribution of loans, the bank's performance between low- and moderate-income (LMI) geographies was weighted equally, unless otherwise noted.

For the home mortgage borrower distribution analysis, the impact that income and housing costs have on limiting homeownership opportunities of LMI individuals and families was considered. Additionally, the impact of home affordability for LMI borrowers in higher cost areas when comparing the distribution of home mortgage loans to the demographics was considered. In these higher cost markets, it is difficult for LMI borrowers to afford a home as the area's median housing value is typically too high for conventional mortgage loan qualifications.

When there were differences in performance between loan products in a specific AA, examiners determined the overall geographic and borrower conclusion by weighting the products based on the loan mix by number of loans over the evaluation period. Weighting by number of loans gives consideration for each lending decision regardless of the loan's dollar amount.

*Community Development Loans*

Analysis considered the number and dollar volume of Community Development (CD) loans with more positive consideration provided to those loans that were particularly innovative, complex, or responsive to the needs of the AA. To provide perspective on the relative level of CD lending, the bank's tier 1 capital was allocated to the rating areas and AAs based on the pro rata share of allocated deposits. CD lending could have a positive, neutral, or negative impact on the performance rating, which is described within the narrative comments.

*Flexible and Innovative Lending Programs*

The bank used the below innovative and/or flexible lending programs to serve AA credit needs during the evaluation. See the "Product Innovation and Flexibility" section in the rating areas for additional information on how the bank utilized these products.

Federal Home Loan Bank (FHLB)

BKU, as a member bank of the FHLB of Atlanta, provides funds at closing for the borrower to use as downpayment and closing costs. In addition, BKU purchases the first mortgage from the non-profit lender, providing them a funding source and revenue on the mortgage made to the homeowner. This resource helps to provide the critical funding for affordable housing development throughout the communities the bank serves.

Neighborhood Lending Partners of Florida, Inc.

The bank, through its partnership with Neighborhood Lending Partners of Florida, Inc, provides lending opportunities utilizing a consortium of banks that facilitate the development of affordable housing projects and real estate based economic development programs in the state of Florida, utilizing low-income housing tax credits. These loans help to support the bank's AAs.

The bank also provides mortgage warehouse lines of credit to its community partners utilizing the bank's affordable housing residential program criteria and purchases the residential mortgage loans to LMI borrowers originated by these partners. This product enables LMI borrowers to attain mortgages and allows the community partners to replenish their capital. These lines are available in FL, NY, and TX.

COVID-19 Pandemic

BKU participated in the Paycheck Protection Program (PPP) and the Main Street Lending Program in and outside of the bank's CRA AA. Additionally, the bank temporarily provided full benefit of stimulus payments for overdrawn customers, waived select deposit account and ATM fees, granted loan forbearance or payment deferrals, and loan modifications to commercial and residential borrowers, suppressed money market and saving accounts excessive transaction activity fees for both consumer and business accounts, contributed to food banks and community partners in the AAs, and offered digital banking service options to customers such as online mobile banking.

**Investment Test**

When conducting analysis under the Investment Test, the CD investments and grants made in each AA were compared to the AA's allocated tier 1 capital. The analysis also included evaluating how responsive

the investments and grants were to the needs of the communities and if there were any impediments to meeting those needs. The volume of investments made during the current evaluation period and those made in prior evaluation periods that remained outstanding were considered. Investments made in a prior period were considered at the book value of the investment as of December 31, 2023.

### **Broader Statewide or Regional Area**

During the evaluation period, the bank made five current period CD investments benefiting the broader statewide or regional areas totaling \$57.5 million without a purpose, mandate, or function (P/M/F) to benefit the bank's AAs.

### **Service Test**

The review of services during the evaluation period included analyzing the bank's branch network and deposit-taking ATMs for the availability and effectiveness of delivering retail banking services. Greatest weight was placed on the geographic distribution of bank branches and changes in branch locations. The analysis of the distribution of the bank's retail branches was based on branch and ATM locations as of December 31, 2023. Geography income category classifications were based on the 2020 Census. When applicable, changes to the branch distribution in an AA that resulted solely from a geographic income classification changing from the 2015 ACS to the 2020 U.S. Census were considered.

In the full-scope AAs, examiners reviewed branch locations in middle- and upper-income geographies that served and improved access for LMI customers or customers in LMI geographies in one of two ways. Positive consideration was given when a middle- or upper-income branch was "across the street" (less than 1,000 feet) from a LMI geography. Examiners also considered branches in middle- and upper-income geographies that, based on bank prepared data, served customers from LMI geographies where the bank originated small business loans. Examiners considered each middle- and upper-income branch only once in this analysis.

The bank offered alternative delivery systems (ADS) including telephone and online banking, electronic bill pay, mobile banking, and deposit-taking ATMs that increased accessibility for both retail and business customers.

Where the bank opened or closed branches within an AA, the overall impact of the changes was evaluated. If no branches were opened or closed in an AA, examiners did not include that performance element in the analysis.

Examiners specifically focused on differences in branch hours and services in LMI geographies compared to those in middle- and upper-income geographies. Services and products offered at branches were consistent throughout the branch.

The bank's record of providing CD services was evaluated in AAs that received full-scope reviews. The primary consideration was the extent and responsiveness of the bank's CD services in meeting community needs within its AAs. Examiners gave the most consideration to CD services that addressed critical needs and were most impactful to the AA. To determine conclusions, examiners weighed the responsiveness of the activities, the total number of hours volunteered, the expertise of the employees volunteering, and the number of persons served against the bank's capacity to provide those services in each AA.



### **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. §25.28(c) in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Florida

**CRA rating for the State of Florida:** High Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs when compared to the bank's deposit rank.
- The bank exhibits an excellent geographic distribution of originated and purchased loans.
- The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes.
- BKU has made a relatively high level of CD loans. This had a positive impact on the Lending Test rating.
- BKU has an excellent level of qualified investments, grants, and donations.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a significant level of CD services.

### Description of Institution's Operations in Florida

BKU has six AAs within the state of Florida. These include the Cape Coral CSA, Miami CSA, North Port MSA, Orlando MSA, and Tampa MSA. The AAs met the requirements of the CRA and did not arbitrarily exclude any LMI geographies. The bank chose full counties in all AAs.

Based on FDIC Deposit Market Share data as of June 30, 2023, the bank had \$19.6 billion of total bank deposits in the state of Florida, accounting for 75.1 of total bank deposits. The Miami CSA represented 69.5 percent of total bank deposits, 70.7 percent of total bank branches, and 56.6 percent of total bank lending activity. Home mortgages represented 19.8 percent and loans to small businesses 80.2 percent of lending activity in the AA. The largest depository institutions include Bank of America, NA, which ranked first (17.4 percent) with 41 offices, JP Morgan Chase Bank, NA, which ranked second (12.7 percent) with 187 offices, and Wells Fargo Bank, NA, which ranked third (12.3 percent) with 189 offices. BKU exited St. Lucie County in March of 2022 and lending and CD activity was evaluated from January 1, 2021, through December 31, 2021.

Refer to appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

The following tables provide a summary of the demographics, including housing and business information, for each analysis period.

### Miami CSA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Miami CSA 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,331	6.1	27.5	30.6	33.1	2.8
Population by Geography	6,443,458	5.6	28.1	33.3	32.6	0.4
Housing Units by Geography	2,777,572	5.3	26.7	32.9	34.8	0.3
Owner-Occupied Units by Geography	1,416,581	2.5	22.0	35.4	40.0	0.1
Occupied Rental Units by Geography	858,136	10.0	36.1	31.0	22.5	0.4
Vacant Units by Geography	502,855	5.3	24.1	29.2	40.9	0.5
Businesses by Geography	1,775,471	4.1	21.9	29.5	43.3	1.2
Farms by Geography	25,084	4.8	25.2	32.4	37.3	0.4
Family Distribution by Income Level	1,477,569	22.8	17.2	17.9	42.1	0.0
Household Distribution by Income Level	2,274,717	25.0	15.8	16.7	42.5	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach-Sunrise, FL		\$61,809	Median Housing Value			\$221,822
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL		\$49,264	Median Gross Rent			\$1,178
Median Family Income MSA - 38940 Port St. Lucie, FL MSA		\$56,570	Families Below Poverty Level			13.2%
Median Family Income MSA - 42680 Sebastian-Vero Beach, FL MSA		\$58,448				
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL		\$65,914				
<i>Source: 2015 ACS and 2021 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Miami CSA 2022-2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,585	5.2	25.8	30.5	34.6	3.9
Population by Geography	6,456,552	4.6	27.5	31.7	34.8	1.5
Housing Units by Geography	2,710,494	4.6	26.7	31.1	36.1	1.4
Owner-Occupied Units by Geography	1,399,995	2.8	21.2	32.3	42.7	1.0
Occupied Rental Units by Geography	898,574	7.7	37.1	31.2	22.2	1.8
Vacant Units by Geography	411,925	4.2	22.9	26.9	43.9	2.0

Businesses by Geography	2,336,470	2.9	22.2	29.2	43.0	2.6
Farms by Geography	29,775	4.0	24.4	30.2	40.0	1.4
Family Distribution by Income Level	1,496,624	22.2	17.6	18.1	42.1	0.0
Household Distribution by Income Level	2,298,569	24.6	16.0	16.8	42.6	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach- Sunrise, FL	\$73,430	Median Housing Value				\$319,482
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL	\$60,666	Median Gross Rent				\$1,438
Median Family Income MSA - 38940 Port St. Lucie, FL MSA	\$68,546	Families Below Poverty Level				10.4%
Median Family Income MSA - 42680 Sebastian-Vero Beach, FL MSA	\$72,001					
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL	\$79,785					
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Based on the median family income information in the above table, LMI families would be challenged to afford a mortgage in the AA. One method used to determine housing affordability assumes a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses. A low-income borrower making \$43,583 per year (or less than 50 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$202,969 mortgage with a payment of \$1,090 per month. A moderate-income borrower making \$69,733 per year (or less than 80 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$324,751 mortgage with a payment of \$1,743 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$3,113. The median housing value in the AA is \$400,000 and \$579,900 in 2021 and 2023 reflecting a percent change of 45.0percent from 2021 to 2023 according to Realtor.com data.

### Miami MSA

According to the August 2024 Moody's Analytics report, the AA strengths are strong ties to Latin America, how the luxury status attracts international capital, the world's second-busiest cruise port, and a well-developed shipping and distribution infrastructure. Growth is expected to remain moderate, though the AA is showing signs of fatigue with mixed industrial performance. The 2023 unemployment rate for the AA was 1.8 percent compared to 5.6 percent in 2021. The leading industries by wage tier include the offices of physicians, legal services, the federal government, and management, scientific & consulting services. Major employers include Publix supermarkets, Baptist Health South Florida, American Airlines, Jackson Health System, and Florida International University.

### Fort Lauderdale MSA

According to the April 2024 Moody's Analytics report, the AA strengths are strong ties to international trade via Latin America, spillover from Miami tourism and trade, and being an attractive tourism destination. The AA's growth is sustaining a solid pace following rapid expansion from 2022, and gradual interest rate cuts will support finance and real estate-related industries contributing to strong population growth. The 2023 unemployment rate for the AA was 2.9 percent compared to 5.0 percent in 2021. The leading industries by wage tier include offices of physicians, legal services, agencies, brokerages & other

insurance related accounts, and management, scientific & technical consulting services. Major employers include Nova Southeastern University, First Service Residential, HEICO, Spirit Airlines, and American Express.

### West Palm Beach MSA

According to the April 2024 Moody's Analytics report, the AA strengths are vibrant professional and business services, well-positioned to expand logistics and international trade, and high per capita income. The AA's growth is plateauing in leisure/hospitality employment, while interest and rent expenses are outpacing wage and salary growth. The 2023 unemployment rate for the AA was 3 percent compared to 4.4 percent in 2021. The leading industries by wage tier include offices of physicians, legal services, management of companies & enterprises, and management, scientific & technical consulting services. Major employers include Tenet Healthcare Corp., Nextera Energy, Florida Power & Light Co., Florida Atlantic University, and Hospital Corp. of America.

### Community Contacts

Five community contacts were completed during the evaluation period with organizations serving the bank's AA. These organizations focus on affordable housing and economic development targeted to LMI individuals. Contacts noted most financial institutions are working to provide credit to LMI individuals. However, given the current housing prices and interest rates, LMI individuals are struggling to afford a house and the cost of a mortgage.

Credit and community development needs identified include:

- Action from developers and the market to make housing affordable
- Significant demand for housing due to several large corporations relocating to Miami
- More small business loans and small-dollar loans to consumers

Opportunities for participation by financial institutions include the following:

- Supporting economic development in LMI areas
- Participation from financial institutions in providing financing and affordable multifamily housing and one-to-four family homes
- More products and services for small businesses and individuals with low credit scores

## **Scope of Evaluation in Florida**

We conducted a full-scope review of the Miami CSA, which carried the greatest weight of the assessment areas in the state of Florida as it represents the most significant market in terms of deposits concentrations, branch network, and reportable loans. The Miami CSA accounted for 92.5 percent of deposits, 77.4 percent of branches, and 72.2 percent of loans in the five AAs. The remaining four AAs (Cape Coral CSA, North Port MSA, Orlando MSA, and Tampa MSA) received limited-scope evaluations. In each AA, examiners placed more emphasis on the small business lending since the bank is not a HMDA reporter. In the Miami CSA, examiners gave more weight to small business loans originated and purchased in the 2021 period as it represented the majority of originations during the evaluation period. St. Lucie County was removed from the Miami CSA and not part of the 2022-2023 analysis period due to the closure of the lone branch in the county. Refer to appendix A for more information on the composition of the bank's AAs.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

### LENDING TEST

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

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami CSA is good.

### Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% of State Loans	% of State Deposits
Cape Coral CSA	96	144	2	242	11.7	2.3
Miami CSA	448	1,820	83	2,351	54.5	92.5
North Port MSA	45	39	3	87	5.5	0.9
Orlando MSA	83	145	17	245	10.1	1.4
Tampa MSA	150	172	16	338	18.2	2.8
<b>Total</b>	<b>822</b>	<b>2,320</b>	<b>121</b>	<b>3,263</b>	<b>100</b>	<b>100</b>

Dollar Volume of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% of State Loans	% of State Deposits
Cape Coral CSA	19,487,012	28,754	3,005,000	22,520,766	4.2	2.3
Miami CSA	21,448,941	338,677	262,224,365	284,011,983	52.8	92.5
North Port MSA	23,203,033	6,927	9,022,985	32,232,945	6	0.9
Orlando MSA	16,094,226	28,760	74,456,941	90,579,927	16.8	1.4
Tampa MSA	20,078,653	40,332	88,455,957	108,574,942	20.2	2.8
<b>Total</b>	<b>100,311,865</b>	<b>443,450</b>	<b>437,165,248</b>	<b>537,920,563</b>	<b>100</b>	<b>100</b>

### Miami CSA

Lending levels reflect adequate responsiveness to AA credit needs. We considered the lending volume in the AA relative to the bank's capacity based on deposits, competition, and market presence.

### 2021 Period

According to FDIC Deposit Market Share data as of June 30, 2021, the bank ranked seventh among 84 depository financial institutions with a market share of 4.1 percent, placing it in the top 10 percent of banks.

Based on 2021 Peer Small Business data, the bank ranked 25<sup>th</sup> out of 377 small business lenders with a market share of 1.6 percent, placing in the top 10 percent of lenders in the AA. The top three lenders, with a combined market share of 32.2 percent were American Express National Bank (11.5 percent), Bank of America (12.2 percent), and JPMorgan Chase Bank (8.5 percent).

#### 2022-2023 Period

According to FDIC Deposit Market Share data as of June 30, 2023, the bank ranked seventh among 87 depository institutions with a market share of 5.2 percent, placing it in the top 10 percent of banks.

Based on the 2022 Peer Small Business data for 2022, the bank ranked 45<sup>th</sup> out of 283 small business lenders with a market share of 0.8 percent, placing it in the top 16 percent of lenders in the AA. The top three lenders, with a combined market share of 41.3 percent were American Express National Bank (19.7 percent), JPMorgan Chase Bank (10.4 percent), and Bank of America (11.2 percent).

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits an excellent geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of home mortgage loans was excellent.

#### Miami CSA

##### 2021 Period

The geographic distribution of the bank's home mortgage lending was excellent. The proportion of loans exceeded both the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was near to the percentage of owner-occupied housing units in moderate-income geographies and exceeded the aggregate.

##### 2022-2023 Period

The geographic distribution of the bank's home mortgage lending was excellent. The proportion of loans was near to the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans exceeded the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

#### ***Small Loans to Businesses***

Refer to Table Q in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was excellent.

## Miami CSA

### 2021 Period

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

### 2022-2023 Period

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

### ***Lending Gap Analysis***

The OCC evaluated the bank's geographic lending patterns of home mortgage loans and small business activity by mapping loan originations and purchases throughout the AA during the evaluation period. We did not identify any unexplained conspicuous lending gaps.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was very poor.

## Miami CSA

### 2021 Period

The borrower distribution of the bank's home mortgage lending was very poor. The proportion of loans was significantly below both the percentage of LMI families and the aggregate.

### 2022-2023 Period

The borrower distribution of the bank's home mortgage lending was very poor. The proportion of loans was significantly below both the percentage of LMI families and the aggregate.



***Small Loans to Businesses***

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses. Based on data in the tables and considering the performance context factors discussed above, the overall borrower distribution for small business loans was adequate. Consideration of the bank's PPP lending, which accounted for 12.8 percent of the bank's small loans to business with no revenues, had a neutral impact on the assessment of the bank's distribution of loans by income level of the borrower.

**Miami CSA*****2021 Period***

The bank did not collect or consider the gross annual revenues in the underwriting of 13.5 percent of its small loans to businesses in the AA. Based on loans to those businesses with known revenues, the borrower distribution of the bank's loans to small businesses by revenue was adequate. The proportion of loans was well below the percentage of small businesses and near to the aggregate.

***2022-2023 Period***

The borrower distribution of the bank's loans to small businesses by revenue was adequate. The proportion of loans was well below the percentage of small businesses and below the aggregate.

**Community Development Lending****Miami CSA**

The institution has made a relatively high level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

**Miami CSA**

The institution has made a relatively high level of CD loans.

The bank made 83 CD loans totaling \$262.2 million or 11.5 percent of allocated tier 1 capital during the evaluation period. By dollar volume, 14.7 percent of these loans funded affordable housing, 20.0 percent economic development, 40.1 percent revitalization and stabilization efforts, and 25.2 percent community services targeted to LMI individuals. The bank made 13 PPP loans totaling \$18.7 million to provide funding for organizations ongoing operations due to the COVID-19 pandemic.

Examples of CD loans include:

- A \$5 million loan to an investment firm to fund the construction of a mixed-use workforce housing property. The loan partially benefited LMI individuals by providing affordable housing with 32 of the

200 units allocated for affordable housing as part of a work force housing program. In addition, based on the New Markets Tax Credit Program eligibility, the property is located in an area that has been identified as being in a severely distressed status.

- A \$1.5 million loan to a small business that specializes in design and manufacturing. The purpose of the loan was to support product expansion during the pandemic and job retention which promotes economic development. The property is located in an area that is considered a severely distressed area eligible for New Markets Tax Credit.
- A \$1.3 million renewal and increase of a line of credit to a nonprofit organization. The organization is a HUD-approved Foreclosure and Housing Counseling Agency that helps to provide affordable housing and housing counselling for LMI families. The loan proceeds will be used to fund loans underwritten by the organization.

### **Broader Statewide and Regional Lending**

During the evaluation period, the bank made two CD loans benefiting the broader statewide and regional areas totaling \$2 million without a P/M/F to benefit the bank’s AAs. These CD loans had a neutral impact on the Lending Test rating for the state.

### **Product Innovation and Flexibility**

The institution uses innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

<b>Loan Type</b>	<b>Number of Loans</b>	<b>Dollar Amount (\$000s)</b>
FHLB	5	418
Neighborhood Lending Partners of FL, Inc.	5	487
Warehouse loans	76	7,387
<b>Total</b>	<b>86</b>	<b>8,292</b>

### **Conclusions for Area Receiving a Limited-Scope Review**

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Orlando MSA is consistent with the bank’s overall performance under the Lending Test in the full-scope area.

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Cape Coral CSA, North Port MSA, and Tampa MSA is weaker than the bank’s overall performance under the Lending Test in the full-scope. Weaker performance to LMI borrowers and in LMI geographies were determinant in drawing the weaker conclusion and did not impact overall conclusions in the state because they represent a smaller portion of lending in the rating area.

Refer to Tables O through V in the state of Florida section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The bank's performance under the Investment Test in Florida is rated Outstanding.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami CSA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cape Coral CSA	7	1,936	28	9,162	35	8.2	11,098	4.7	0	0
Miami CSA	46	107,806	246	98,984	292	68.2	206,790	87.7	3	26,563
North Port MSA	5	3,157	6	223	11	2.6	3,380	1.4	0	0
Orlando MSA	7	740	37	3,835	44	10.3	4,575	1.9	0	0
Tampa MSA	10	1,165	36	8,676	46	10.7	9,841	4.2	0	0
Statewide or Regional with indirect Benefit	8	819	1	6,288	9	100	7,107	100	0	0

### Miami CSA

The institution has an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

The dollar volume of current- and prior- period investments represented 9.0 percent of allocated tier 1 capital. These investments included 227 grants and donations totaling \$1.6 million to 90 organizations. By dollar volume, 36.7 percent of these investments funded affordable housing, 15.4 percent economic development, and 47.9 percent community services targeted to LMI individuals.

Examples of community development investments include:

- A \$62 million investment in mortgage-backed securities (MBSs) to support 272 units set aside for Section 8 tenants with 99 percent of household incomes at or below 50 percent Area Median Income (AMI). The investment helps to sustain affordable housing opportunities.
- A \$750,000 equity equivalent investment (EQ2) to a Community Development Financial Institution (CDFI) for working capital to provide minority-owned and woman owned businesses and LMI individuals financial services and expand economic opportunity by increasing access to financial products and services.

- Established and maintained a \$100,000 certificate of deposit placed with a CDFI, providing access to capital to help minority-owned banks expand their capabilities and modernize infrastructure to reach their communities.

### Broader Statewide or Regional Area

During the evaluation period, the bank made one current period and had eight prior period CD investments benefiting the broader statewide and regional areas totaling \$7.1 million without a P/M/F to benefit affordable housing in the bank’s AAs. These investments had neutral impact to conclusions in the state.

### Conclusions for Areas Receiving a Limited-Scope Review

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Cape Coral CSA, North Port MSA, Orlando MSA, and Tampa MSA is consistent with the bank’s overall performance under the Investment Test in the full-scope area. The performance in the limited-scope AAs had a neutral impact on the overall Investment Test conclusion.

### SERVICE TEST

The bank’s performance under the Service Test in Florida is rated Low Satisfactory.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Miami CSA is adequate.

### Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution’s AAs.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Cape Coral CSA	2.3	3	5.7	0.0	25.0	0.0	75.0	0.0	3.9	23.0	44.6	27.5	0.9
Miami CSA	92.5	41	77.4	0.0	24.4	24.4	43.9	7.3	4.6	27.5	31.7	34.8	1.5
North Port MSA	0.9	1	1.9	0.0	0.0	100.0	0.0	0.0	0.9	16.6	50.2	31.9	0.3
Orlando MSA	1.4	4	7.5	0.0	0.0	50.0	50.0	0.0	3.9	24.6	30.2	40.0	1.4
Tampa MSA	2.8	4	7.5	0.0	0.0	50.0	50.0	0.0	4.1	22.1	39.0	33.5	1.3

*The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.  
\*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.*

Miami CSA

The bank has 41 branches in the AA, with none in low-income geographies and 10 located in moderate-income geographies. The bank’s distribution of branches in low-income geographies was significantly below, and in moderate-income geographies was near to the percentage of the population living within those geographies. Examiners also considered 10 branches in middle- or upper-income geographies that were in proximity to reasonably serve LMI areas. The bank provided sufficient data showing LMI CTs being served through small business lending. This had a positive impact on conclusions.

The bank compliments its traditional service delivery systems with alternative delivery systems including automated teller machines (ATMs), online banking, and mobile banking options. BKU had 42 ATMs of which 28 are deposit-taking in the AA, and none were in low-income geographies and 21.4 percent were in moderate-income geographies. The bank provided data showing the rate of adoption and usage by LMI individuals and individuals located in LMI geographies. This had a neutral impact on conclusions.

<b>Distribution of Branch Openings/Closings</b>							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Cape Coral CSA	0	1	0	-1	0	0	0
Miami CSA	1	14	-1	-4	-3	-5	0
North Port MSA	0	1	0	0	-1	0	0
Orlando MSA	0	0	0	0	0	0	0
Tampa MSA	0	4	0	-1	-1	-2	0

*The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.  
\* The NA category consists of geographies that have not been assigned an income classification.*

Miami CSA

The bank’s opening and closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI income geographies and/or to LMI individuals. The bank opened one branch and closed 14 branches in the AA during the evaluation period. There was a net closing of one branch in a low-income geography and four branches in moderate-income geographies. There was one branch opening and one branch closing in an NA CT. The branches in the middle- and upper-income areas offer traditional banking products and services. Branch hours were from 9:00 am to 5:00 pm Monday through Friday. Most of the branches feature drive-up facilities with similar hours to the branch.

**Community Development Services**

Miami CSA

The bank provides a significant level of CD services.

The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 132 bank employees either provided financial or job-specific expertise for 1,009 qualified CD service activities to 117 organizations for a total

of 3,595 hours. CD activities supported community services (52.3 percent), affordable housing (29.7), economic development (16.4), and revitalization and stabilization (1.6) targeted to LMI individuals. Leadership was evidenced by 20 bank employees spending 575 hours participating on boards and committees for 28 different CD organizations. The bank's assistance was responsive to identified needs in the AA, particularly with affordable housing.

Service activity examples during the evaluation period include:

- Two bank employees provided 108 service hours with a nonprofit organization whose mission is to provide affordable and workforce housing to meet the needs of LMI individuals and families in the AA. The organization advocates for policy reform of the underlying causes of the affordable housing and develops affordable solutions. Along with education and awareness, the organization provides a lasting impact upon the community improving living conditions, reducing poverty, enhancing health outcomes, and strengthening local economies.
- Ten bank employees provided 76 service hours at a nonprofit organization which provides food, clothing, shelter, counseling, behavioral health, job training, and financial literacy sessions for LMI individuals.
- An employee provided 59 service hours at a nonprofit organization that offers affordable housing. The organization provides community and economic development to benefit LMI residents and neighborhoods. The organization also provides shelter and foster care for young adults and homes for rent or purchase for LMI families in the AA.

### **Conclusions for Area Receiving a Limited-Scope Review**

Based on limited-scope reviews, the bank's performance under the Service Test in the Cape Coral CSA, North Port MSA, Orlando MSA, and Tampa MSA is weaker than the bank's overall performance under the Service Test in the full-scope area. Weaker performance is attributed to branch distribution in the AAs and did not impact the overall Service Test Rating because they represent a small portion of services in the rating area.

## State Rating

### State of New York

**CRA rating for the State of New York:** High Satisfactory

**The Lending Test is rated:** High Satisfactory

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs when compared to the bank's deposit rank.
- The bank exhibits a good geographic distribution of originated and purchased loans.
- The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes.
- The bank is a leader in making CD loans, which had a positive negative effect on the Lending Test rating.
- The bank has an excellent level of qualified investments, grants, and donations.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided an adequate level of CD services.

### Description of Institution's Operations in New York

The bank has one AA within the state of New York referred to as New York MSA. The AA met the requirements of the CRA and did not arbitrarily exclude any LMI geographies. The bank chose full counties in the AA.

Based on FDIC deposit market share data as of June 30, 2023, the bank had \$6.5 billion in deposits in the state of New York or 24.8 percent of total bank deposits. The New York MSA represented 24.8 percent of all bank deposits, 8.8 percent of total lending activity, and 6.9 percent of all branches. Home mortgages represented 71.2 percent and loans to small businesses 28.8 percent of lending in the AA. The largest depository institutions included JP Morgan Chase Bank, NA, which ranked first (42.1 percent) with 254 offices, Goldman Sachs Bank USA, which ranked second (13.3 percent) with 1 office, and The Bank of New York Mellon, which ranked third (11.1 percent) with 2 offices.

Refer to appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

The following tables provide a summary of the demographics, including housing and business information, for each analysis period.

**New York MSA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: New York MSA 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,372	9.8	28.1	32.3	27.6	2.2
Population by Geography	5,726,139	11.8	30.2	29.6	28.1	0.3
Housing Units by Geography	2,449,765	10.0	27.0	27.7	35.0	0.4
Owner-Occupied Units by Geography	837,186	2.9	19.4	41.7	35.8	0.2
Occupied Rental Units by Geography	1,338,868	15.3	32.4	19.0	32.9	0.5
Vacant Units by Geography	273,711	5.8	24.0	27.1	42.7	0.4
Businesses by Geography	891,444	6.9	20.0	24.1	46.3	2.7
Farms by Geography	7,436	3.5	22.8	41.3	31.6	0.9
Family Distribution by Income Level	1,263,586	29.4	16.1	16.9	37.6	0.0
Household Distribution by Income Level	2,176,054	30.0	14.2	15.5	40.3	0.0
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY		\$108,193	Median Housing Value			\$607,762
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ		\$67,560	Median Gross Rent			\$1,442
			Families Below Poverty Level			14.0%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: New York MSA 2022-2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,500	8.8	24.6	34.3	27.1	5.1
Population by Geography	5,956,245	10.7	26.0	32.5	28.9	1.8
Housing Units by Geography	2,517,292	10.0	23.1	30.5	34.7	1.7
Owner-Occupied Units by Geography	881,294	2.7	19.1	42.5	34.8	0.9
Occupied Rental Units by Geography	1,345,407	15.5	26.5	23.3	32.5	2.2
Vacant Units by Geography	290,591	5.9	19.7	27.5	44.9	2.0
Businesses by Geography	1,179,503	6.9	18.4	25.9	43.6	5.3
Farms by Geography	9,386	3.1	20.2	42.3	31.5	2.9
Family Distribution by Income Level	1,281,039	27.1	15.6	16.9	40.5	0.0
Household Distribution by Income Level	2,226,701	29.0	13.5	14.9	42.6	0.0
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY		\$130,301	Median Housing Value			\$762,867



Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ	\$85,483	Median Gross Rent	\$1,712
		Families Below Poverty Level	11.4%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data Due to rounding, totals may not equal 100.0% (* The NA category consists of geographies that have not been assigned an income classification.</i>			

Based on the median family income information in the above table, LMI families would be challenged to afford a mortgage in the AA. One method used to determine housing affordability assumes a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses. A low-income borrower making \$63,900 per year (or less than 50 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$297,585 mortgage with a payment of \$1,598 per month. A moderate-income borrower making \$102,240 per year (or less than 80 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$476,136 mortgage with a payment of \$2,556 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$3,941. The median housing value in the AA is \$649,000 and \$734,142 in 2021 and 2023 reflecting a percent change of 13.1 percent from 2021 to 2023 according to Realtor.com data.

According to the May 2024 Moody’s Analytics report, the AA strengths are a high per capita income, a fast-growing tech sector, a skilled labor force, and being the financial capital of the U.S. The AA has the potential for increased growth from massive investments in chip production. The 2023 unemployment rate for the AA was 4.2 percent compared to 7.1 percent in 2021. The leading industries by wage tier include general medical and surgical hospitals, offices of physicians, management of companies & enterprises, and building equipment contractors. Major employers include Northwell Health, JPMorgan Chase & Co., New York City Health and Hospitals Corp., the University of Rochester, and Citibank N.A.

Community Contacts

Four community contacts were completed during the evaluation period with organizations serving the bank’s AA. These organizations focus on affordable housing and economic development targeted to LMI individuals. Contacts noted how increased out-migration since the pandemic has given way to a gradual population decline, despite a continued uptick in migration from Gen Z and Millennial generations. Affordable housing preservation and construction have significantly declined in the post-COVID era.

Credit and community development needs identified include:

- Small business lending, technical support, and commercial space
- Remedies for high inflation and building costs
- More affordable housing, especially redevelopment

Opportunities for participation by financial institutions include the following:

- Penetrating complex communities to provide economic development
- Financing environmentally sustainable affordable housing projects
- More branch locations

## Scope of Evaluation in New York

We conducted a full-scope review of the New York MSA as it accounts for all deposits, branch network, and reportable loans in the state. Examiners placed more weight to loans originated and purchased in the 2021 period for small business lending as it represented the majority of originations during the evaluation period. Refer to appendix A – Scope of Examination, for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

### LENDING TEST

The bank’s performance under the Lending Test in New York is rated High Satisfactory.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the New York MSA is good.

### Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% of State Loans	% of State Deposits
New York MSA	560	226	32	818	100	100

Dollar Volume of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% of State Loans	% of State Deposits
New York MSA	68,252,579	81,923	164,292,947	232,627,449	100	100

### New York MSA

Lending levels reflected adequate responsiveness to AA credit needs, when considering the bank’s business strategy and lending market ranks as compared to their deposit market rank.

#### 2021 Period

According to FDIC deposit data as of June 30, 2021, the bank ranked 15<sup>th</sup> among 100 depository financial institutions with a 0.7 percent market share, placing in the top 15 percent of banks.

Based on the Peer Small Business data for 2021, the ranked 72nd out of 364 small business lenders with a market share of 0.4 percent, placing in the top 20 percent of lenders in the AA. The top three lenders, with a combined market share of 40.0 percent were JPMorgan Chase Bank (22.5 percent), American Express National Bank (11.7 percent), and Bank of America (5.8 percent).

2022-2023 Period

According to FDIC deposit data as of June 30, 2023, the bank ranked 21st among 94 depository institutions with a 0.4 percent market share, placing in the top 23 percent of banks.

Based on the Peer Small Business data for 2022, the bank ranked 86th among 271 small business lenders with a market share of 0.17 percent, placing it in the top 32 percent of lenders in the AA. The top three lenders, with a combined market share of 47.5 percent were American Express National Bank (24.4 percent), JPMorgan Chase Bank (17.8 percent), and Bank of America (5.4 percent).

**Distribution of Loans by Income Level of the Geography**

The bank exhibits a good geographic distribution of loans in its AA.

***Home Mortgage Loans***

Refer to Table O in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans was good.

New York MSA2021 Period

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans exceeded both the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was significantly below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

2022-2023 Period

The geographic distribution of the bank's home mortgage lending was good. The proportion of loans was near to the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

***Small Loans to Businesses***

Refer to Table Q in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

Based on the data in the tables and considering the performance context factors discussed above, the overall geographic distribution of small loans to businesses was good.

## New York MSA

### 2021 Period

The geographic distribution of the bank's small loans to businesses was adequate. The proportion of loans was significantly below both the percentage of businesses in low-income geographies and the aggregate. The proportion of loans was near to the percentage of businesses in moderate-income geographies and the aggregate.

### 2022-2023 Period

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded both the percentage of businesses in low-income geographies and the aggregate. The proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

### ***Lending Gap Analysis***

The OCC evaluated the bank's geographic lending patterns of home mortgage loans and small business activity by mapping loan originations and purchases throughout the AA during the evaluation period. We did not identify any unexplained conspicuous lending gaps.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of home mortgage loans was very poor.

## New York MSA

### 2021 Period

The borrower distribution of the bank's home mortgage lending was very poor. The proportion of loans was significantly below the percentages of LMI families and the aggregate.

### 2022-2023 Period

The borrower distribution of the bank's home mortgage lending was very poor. The proportion of loans was significantly below the percentage of LMI families and the aggregate. Borrower information was unavailable due to the loans being purchased loans.

### ***Small Loans to Businesses***

Refer to Table R in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution for small business loans was adequate. Consideration of the bank's PPP lending, which accounted for 24.0 percent of the bank's small loans to business with no revenues, had a neutral impact on the assessment of the bank's distribution of loans by income level of the borrower.

### **New York MSA**

#### **2021 Period**

The bank did not collect or consider the gross annual revenues in the underwriting of 24.8 percent of its small loans to businesses in the AA. Based on those businesses with known revenues, the borrower distribution of the bank's loans to small businesses by revenue was very poor. The proportion of loans was significantly below the percentage of small businesses and the aggregate.

#### **2022-2023 Period**

The borrower distribution of the bank's loans to small businesses by revenue was good. The proportion of loans was well below the percentage of small businesses and exceeded the aggregate.

### **Community Development Lending**

The institution is a leader in making CD loans though this had a neutral impact on the Lending Test conclusion.

The bank made 32 CD loans totaling \$164.3 million, 20.1 percent of the allocated tier 1 capital. By dollar volume, 13.2 percent of these loans funded affordable housing, 5.7 percent economic development, 21.0 percent revitalization and stabilization efforts, and 60.1 percent community services targeted to LMI individuals. The bank made 3 PPP loans totaling \$5.1 million to provide funding for organizations' ongoing operations due to the COVID-19 pandemic.

Examples of CD loans include:

- A \$43.3 million loan for the acquisition of a senior services center consisting of 17,500 members, owned by a New York based nonprofit organization that provides a Medicaid Managed Long-Term Care Program, Dual Eligible Special Needs Plan, and a Medicaid Advantage Plus (MAP) Plan. The nonprofit primarily serves Medicaid recipients under their plans with Medicaid premiums representing above 90 percent of its revenue. The loan provides CD services that are targeted to LMI individuals.
- An \$8 million line of credit to a contracting business serving the greater New York area that is an anchor business to a low-income area. The business provides job opportunities to a majority of skilled laborers who earn low-income wages and represent unions in the local LMI community. The primary purpose of the line of credit is to provide general working capital to allow the borrower to take on additional projects and provide more jobs which will help revitalize and stabilize the local community.

- A \$1.2 million increase and renewal of a line of credit to a Community Development Financial Institution (CDFI) licensed to lend in New York State. The organization participates in municipal, state, and federal affordable housing subsidy programs that aim to keep purchase prices low and allow monthly payments to remain affordable. It offers affordable housing loans to LMI families purchasing in limited-equity cooperatives in New York. The bank provides support to the organization in order to advance its lending activities to LMI borrowers in LMI CTs.

## Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

Loan Type	Number of Loans	Dollar Amount (\$000s)
Warehouse loans	26	3,672

## INVESTMENT TEST

The bank's performance under the Investment Test in New York is rated Outstanding.

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the New York MSA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
New York MSA	16	60,163	182	33,755	198	100	93,918	100	0	0
Statewide or Regional with indirect Benefit	2	1,239	0	0	2	100	1,239	100	0	0

*The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.*

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

## New York MSA

The institution has an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution rarely uses innovative and/or complex investments to support CD initiatives.

The dollar volume of current- and prior- period qualified investments represented 11.5 percent of allocated tier 1 capital. These investments included 160 qualifying grants and donations totaling \$1.5 million to 60 organizations. By dollar volume, 47.4 percent of these investments funded affordable housing, 21.7 percent economic development, and 31 percent community services targeted to LMI individuals.

Examples of community development investments include:

- A \$22.8 million investment in a bond supporting a low-income housing tax credit (LIHTC) affordable housing development where all 152 units are set aside for renters making less than 60 percent of the AMI.
- A \$500,000 EQ2 to a CDFI for working capital to provide small businesses including the minority-owned and woman owned businesses and LMI individuals financial services and expand economic opportunity by increasing access to financial products and services.
- A \$45,000 donation to a nonprofit organization, whose mission is to provide housing opportunities to LMI families and individuals in the AA.

### Broader Statewide or Regional Area

During the evaluation period, the bank had two prior period CD investments benefiting the broader statewide and regional areas totaling \$1.2 million without a P/M/F to benefit affordable housing in the bank’s AAs.

### SERVICE TEST

The bank’s performance under the Service Test in New York is rated Low Satisfactory.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the New York MSA is adequate.

### Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
New York MSA	100	4	100	25	0	25	50	0	10.7	26	32.5	28.9	1.8

*The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.  
\*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.*

New York MSA

The bank has four branches in the AA, with one branch in a low-income geography and none in moderate-income geographies. The bank's distribution of branches in low-income geographies exceeded, and in moderate-income geographies was significantly below the percentage of the population living within those geographies.

The bank complements its traditional service delivery systems with alternative delivery systems including ATMs, online banking, and mobile banking options. BKU had five ATMs of which three are deposit-taking in the AA, of which none were in low-income geographies and 33.3 percent were in moderate-income geographies. The bank provided data showing the rate of adoption and usage by LMI individuals and individuals located in LMI geographies. This had a neutral impact on conclusions.

The bank did not open or close branches during the evaluation period.

New York MSA

The bank did not open or close branches during the evaluation period.

Services offered, including where appropriate, hours of operations, did not vary in a way that inconvenience the AA, particularly LMI geographies and/or individuals. Branch hours were from 9:00 am to 5:00 pm Monday through Friday.

**Community Development Services**New York MSA

The bank provides an adequate level of CD services.

The bank conducted or supported a reasonable number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 24 employees either provided financial or job-specific expertise for 248 qualified CD service activities to 47 organizations since the last evaluation, for a total of 761 hours. CD activities supported affordable housing (36.0 percent), community services (35.2), economic development (25.9), and revitalization and stabilization (2.0) targeted to LMI individuals. Leadership was evidenced by five bank employees spending 460 hours participating on boards and committees for 19 different CD organizations. The bank's assistance was responsive to identified needs in the AA, particularly with affordable housing.

Service activity examples during the evaluation period include:

- Four bank employees provided 69 service hours with an organization whose mission is to assist LMI individuals in securing affordable housing. The organization empowers low-to-moderate-income residents to take control of their housing and enhance communities by creating strong tenant associations and lasting affordable co-ops.
- Two bank employees provided 35 service hours to assist an organization which works with local community groups in all five boroughs of New York City to ensure they have the tools and power



needed to control the policies and decisions that affect their neighborhoods. The mission of the organization is to build community power to win affordable housing and thriving, equitable neighborhoods. As a coalition of community groups across the AA, the organization utilizes capacity building and technical assistance, policy research, organizing, and advocacy to support members in building equity and justice in their neighborhoods and citywide.

- Two bank employees provided 30 service hours with a CDFI which enables LMI individuals and families to invest in, preserve, and improve their neighborhoods and their homes through financial empowerment and affordable lending. The organization offers accessible, affordable, and tailored education programs and counseling services. In addition, the services enable LMI individuals and families to successfully buy and maintain their homes. The organization originates and facilitates mortgages loans, provides grants for down payment assistance, makes critically needed repairs, and maintains homeownership.

## State Rating

### State of Texas

**CRA rating for the State of Texas:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs when compared to the bank's deposit rank.
- The bank exhibits good geographic distribution of originated and purchased home mortgage loans.
- The bank exhibits an excellent distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank was a leader in making CD loans, which had a positive effect on the Lending Test rating.
- The bank has an excellent level of qualified investments, grants, and donations.
- Service delivery systems were reasonably accessible to geographies and individuals of different income levels in the bank's AA.
- The bank provided an adequate level of CD services.

### Description of Institution's Operations in Texas

The bank has one AA within the state of Texas referred to as the Dallas MSA. The AA met the requirements of the CRA and did not arbitrarily exclude any LMI. The bank chose full counties in the AA.

Based on FDIC Deposit Market Share data as of June 30, 2023, the bank had \$20.3 million in deposits in the state of Texas or 0.1 percent of total bank deposits. The Dallas MSA represented 0.1 percent of all bank deposits, 1.9 percent of total lending activity, and 1.7 percent of all bank branches. Home mortgages represented 78.9 percent and loans to small businesses represented 21.1 percent of lending in the AA. The largest depository institutions include Bank of America, NA, which ranked first (38.4 percent) with 55 offices, JP Morgan Chase Bank, NA, which ranked second (22.5 percent) with 76 offices, and Comerica Bank, which ranked third (4.7 percent) with 35 offices.

Refer to appendix A: Scope of the Examination – List of Assessment Areas and Type of Examination for the counties used to form the AAs.

The following tables provide a summary of the demographics, including housing and business information, for each analysis period.

**Dallas MSA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Dallas MSA 2022-2023</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	645	16.6	34.6	24.8	22.3	1.7
Population by Geography	2,613,539	17.5	36.2	25.5	19.8	1.0
Housing Units by Geography	1,027,813	17.7	33.4	25.7	21.9	1.2
Owner-Occupied Units by Geography	476,375	10.5	32.6	29.1	27.4	0.4
Occupied Rental Units by Geography	469,621	24.4	34.5	22.8	16.3	2.0
Vacant Units by Geography	81,817	22.1	31.8	21.7	22.4	2.0
Businesses by Geography	500,270	8.6	22.5	29.1	38.7	1.1
Farms by Geography	6,413	7.5	23.0	27.7	40.8	1.0
Family Distribution by Income Level	607,453	30.4	20.1	18.5	31.1	0.0
Household Distribution by Income Level	945,996	28.5	19.5	18.1	33.9	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$88,315	Median Housing Value			\$234,735
			Median Gross Rent			\$1,197
			Families Below Poverty Level			11.4%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Based on the median family income information in the above table, LMI families would be challenged to afford a mortgage in the AA. One method used to determine housing affordability assumes a 30-year mortgage with a five percent interest rate, and not accounting for down payment, homeowners insurance, real estate taxes, or any additional monthly expenses. A low-income borrower making \$52,800 per year (or less than 50 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$245,892 mortgage with a payment of \$1,320 per month. A moderate-income borrower making \$84,480 per year (or less than 80 percent of the 2023 FFIEC adjusted median family income in the AA) could afford a \$393,427 mortgage with a payment of \$2,112 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA with an estimated payment of \$2,335. The median housing value in the AA is \$349,900 and \$435,000 in 2021 and 2023 reflecting a percent change of 24.3 percent from 2021 to 2023 according to Realtor.com data.

According to the August 2024 Moody’s Analytics report, the AA strengths are a stable demand for professional services due to many corporate headquarters, a well-positioned distribution center for Southwest as international trade grows, favorable migration trends, and age structure. AA growth is declining in the labor force category, despite growth in healthcare sources and overall population growth. The 2023 unemployment rate for the AA was 3.7 percent compared to 5.0 percent in 2021. The leading industries by wage tier include computer systems design & related services, management of companies & enterprises, management of scientific & technical consulting services, and offices of physicians. Major employers include Walmart Inc., UT Southwest Medical Center, Baylor Scott & White Health, Lockheed Martin, and AT&T.

### Community Contacts

Four community contacts were completed during the evaluation period with organizations serving the bank's AA. These organizations focus on affordable housing and economic development targeted to LMI individuals. Contacts noted the city of Dallas is well-established and is set up for prospective business and development opportunities. The influx of businesses in the post-COVID era has led to an increased demand for affordable housing.

Credit and community development needs identified include:

- Lenders that adhere to Dallas's focus on the Property Assessed Clean Energy (PACE) financing program, which allows owners of commercial, industrial, and multi-family residential properties to obtain low-cost, long-term loans for water conservation, energy efficient improvements, and renewable retrofits
- Increased access to financial services, specifically for geographies south of Interstate 30 in Dallas
- Affordable and senior housing
- Financial literacy

Opportunities for participation by financial institutions include the following:

- Many communities in the AA are in need of financial literacy
- There is an opportunity to provide more affordable housing
- Banking the under banked including seniors

### **Scope of Evaluation in Texas**

The Dallas MSA was selected for analysis using full-scope procedures as the only AA in the state. The AA represented all deposits, branches, and lending in the state. The AA was added in 2022 and 2022-2023 data was analyzed. More emphasis was placed on HMDA lending due to a significantly larger number and dollar amount of HMDA loans..

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

### **LENDING TEST**

The bank's performance under the Lending Test in Texas is rated Outstanding.

### **Conclusions for Areas Receiving Full-Scope Review**

Based on full-scope reviews, the bank's performance in the Dallas MSA is excellent.

## Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% of State Loans	% of State Deposits
Dallas MSA	60	16	4	80	100	100
Dollar Volume of Loans						
Assessment Area	Home Mortgage	Small Business	Community Development	Total	% of State Loans	% of State Deposits
Dallas MSA	15,851,030	900	66,486,000	82,337,930	100	100

### Dallas MSA

Lending levels reflected adequate responsiveness to AA credit needs. when considering the bank's business strategy and lending market ranks as compared to their deposit market rank.

#### 2023

According to FDIC deposit data as of June 30, 2023, the bank ranked 103rd among 113 depository institutions with a 0.1 percent market share due to its new presence in the AA. At the time of the evaluation, peer data information was not available for 2023.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits a good geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to Table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The overall geographic distribution of home mortgage loans was good.

### Dallas MSA

#### 2022-2023 Period

The geographic distribution of the bank's home mortgage lending was good. The proportion of loans was below the percentage of owner-occupied housing units in low-income geographies and was well below the aggregate. The proportion of loans exceeded the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

#### ***Small Loans to Businesses***

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The overall geographic distribution of small loans to businesses was good.

## Dallas MSA

### 2022-2023 Period

The geographic distribution of the bank's small loans to businesses was good. The proportion of loans was below the percentage of businesses in low-income geographies and the aggregate. The proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

### ***Lending Gap Analysis***

The OCC evaluated the bank's geographic lending patterns of home mortgage loans and small business activity by mapping loan originations and purchases throughout the AA during the evaluation period. We did not identify any unexplained conspicuous lending gaps.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an excellent distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The overall borrower distribution of home mortgage loans was very poor.

## Dallas MSA

### 2022-2023 Period

The borrower distribution of the bank's home mortgage lending was very poor. The proportion of loans was significantly below both the percentage of LMI families and the aggregate. Borrower information was unavailable due to the loans being purchased loans.

### ***Small Loans to Businesses***

Refer to Table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses was excellent.

## Dallas MSA

### 2022-2023 Period

The borrower distribution of the bank's loans to small businesses by revenue was excellent. The proportion of loans was near to the percentage of small businesses and exceeded the aggregate.

## Community Development Lending

The institution is a leader in making CD loans.

The bank made four CD loans totaling \$66.5 million, 2,597.1 percent of the allocated tier 1 capital. By dollar volume, 57.7 percent funded economic development, 37.9 percent of these loans affordable housing, and 4.4 percent revitalization and stabilization efforts targeted to LMI individuals.

Examples of CD loans include:

- A \$34.4 million construction loan for the development of a 3-building housing complex with 238 apartments in the AA. The affordable units consist of 96 units designated for tenants earning below 80 percent of the AMI and 24 units reserved for tenants earning at or below 60 percent of the AMI.
- A \$1.3 million line of credit to a CDFI licensed to lend in Texas. The organization is a HUD-certified housing counseling agency as well as a US Small Business Administration Certified Community Development Corporation that promotes the acquisition of wealth-building assets, such as homeownership and entrepreneurship, with the financial tools and education necessary to build personal net worth. The CDFI serves LMI individuals, families, and small business owners. The bank provides support to the organization in order to advance its lending activities to LMI borrowers in LMI CTs. The loan proceeds will be used to fund loans underwritten by the organization.

## Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. Refer to the comments in the Product Innovation and Flexibility section of this performance evaluation for additional details regarding the programs.

## INVESTMENT TEST

The bank’s performance under the Investment Test in Texas is rated Outstanding.

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Dallas MSA is excellent.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Dallas MSA	0	0	29	2,681	29	100	2,681	100	0	0

*The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.*  
*\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.*  
*\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.*

**Dallas MSA**

The bank has an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

The dollar volume of current- period investments represented 104.7 percent of allocated tier 1 capital. Total qualified investments included 26 qualifying grants and donations totaling 116,000 to 14 organizations. By dollar volume, 44 percent of these investments funded affordable housing, 38.8 percent economic development, and 17.2 percent community services targeted to LMI income individuals.

Examples of community development investments include:

- A \$1.3 million MBS investment through a nonprofit organization comprised of six total loans in the AA to LMI borrowers.
- A \$1 million MBS investment through a nonprofit organization comprised of four residential loans in the AA to LMI borrowers.
- A \$250,000 EQ2 in a CDFI for working capital to provide small businesses, including minority-owned and woman owned businesses and LMI individuals, financial services and expand economic opportunity by increasing access to financial products and services.

**SERVICE TEST**

The bank’s performance under the Service Test in Texas is rated Low Satisfactory.

**Conclusions for Areas Receiving Full-Scope Reviews**

Based on full-scope reviews, the bank’s performance in the Dallas MSA is adequate.

**Retail Banking Services**

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank’s AA.

Distribution of Branch Delivery System													
Assessment Area	Deposits	Branches							Population				
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography				
				Low	Mod	Mid	Upp	NA*	Low	Mod	Mid	Upp	NA*
Dallas MSA	100	1	100	0	0	0	1	0	7.5	36.2	25.5	19.8	1

*The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.  
\*The NA category consists of geographies that have not been assigned an income classification. Due to rounding, totals may not equal 100.0%.*



Dallas MSA

The bank has one branch in the AA. The bank’s distribution of branches in LMI geographies was well below the percentage of the population living within those geographies.

The bank complements its traditional service delivery systems with alternative delivery systems including automated teller machines (ATMs), online banking, and mobile banking options. BKU had one ATM in the AA, which was not in a LMI geography. The bank provided data showing the rate of adoption and usage by LMI individuals and individuals located in LMI geographies. This had a neutral impact on conclusions.

Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA*
Dallas MSA	1	0	0	0	0	1	0

*The tables present the data for the entire rating area. The narrative below addresses performance in full-scope areas only.  
\* The NA category consists of geographies that have not been assigned an income classification.*

Dallas MSA

The bank’s opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI income geographies and/or to LMI individuals. BKU planned to open its only branch in a low-income designated CT; however, following the release of the 2020 U.S. Census demographic data in April 2022, shortly before the branch inauguration, the CT was reclassified as upper-income. The branch offers traditional banking products and services. Branch hours, including drive-up feature, were from 9:00 am to 5:00 pm Monday through Friday.

**Community Development Services**

Dallas MSA

The bank provides a low level of CD services.

The bank supported a low number of CD service, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, five employees either provided their financial or job-specific expertise for 32 qualified CD service activities to 12 organizations for a total of 76 hours. CD activities supported affordable housing (53.1 percent), revitalization and stabilization efforts (31.3), percent economic development (9.4), and community services (6.3) targeted to LMI individuals. None of the bank employees participated in leadership roles on boards and committees. The bank’s assistance was responsive to identified needs in the AA, particularly with affordable housing.

Service activity examples during the evaluation period include:

- Three bank employees provided 36 service hours with an organization whose mission is to provide wealth-building through homeownership, entrepreneurship, and financial education. The organization

provides homeownership financing with downpayment assistance, small business lending, and community facilities financing.

- Two bank employees provided 13 service hours with an organization that has a mission to empower, enable, and support community members in their efforts to revitalize communities and neighborhoods. The target market of the organization's project is aimed at LMI individuals and families.
- Two bank employees provided four service hours to a nonprofit organization whose mission is to transform surrounding communities by making investments in local communities. These investments include construction, instilling transforming initiatives for the community, cultivating public policy, and creating opportunities for economic mobility that benefits LMI individuals and families.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	January 1, 2021 through December 31, 2023	
<b>Bank Products Reviewed:</b>	Home mortgage lending, small business lending, community development (CD) loans, CD qualified investments, and CD services	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>States</b>		
<b>Florida</b>		
Cape Coral CSA	Limited-scope	Collier County - 021 Lee County - 071
Miami CSA	Full-Scope	Broward County - 011 Martin County - 085 Miami Dade County - 086 Indian River County - 061 Palm Beach County - 099 St. Lucie – 111 (2021)
North Port MSA	Limited-scope	Sarasota County - 115
Orlando MSA	Limited-scope	Orange County - 095 Seminole County - 117
Tampa MSA	Limited-scope	Hillsborough County - 057 Pinellas County - 103
<b>New York</b>		
New York MSA	Full-scope	Kings County - 047 New York County - 061 Suffolk County - 103
<b>Texas</b>		
Dallas MSA	Full-scope	Dallas - 113 (2022-2023)

## Appendix B: Summary of State Ratings

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RATINGS BankUnited				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
BankUnited	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State:				
State of Florida	High Satisfactory	Outstanding	Low Satisfactory	High Satisfactory
State of New York	High Satisfactory	Outstanding	Low Satisfactory	High Satisfactory
State of Texas	Outstanding	Outstanding	Low Satisfactory	Outstanding
(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.				

## Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**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, 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 non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct 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 the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**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 (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

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

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

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

**MMSA (state):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**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.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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



## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

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

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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

## Florida

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2021
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cape Coral CSA	20	7,002,772	20.0	82,888	2.1	5.0	1.4	17.8	50.0	17.8	43.2	15.0	43.9	36.9	30.0	36.9	0.0	0.0	0.0
Miami CSA	20	7,048,874	20.0	305,021	2.5	5.0	1.9	22.0	20.0	17.8	35.4	50.0	36.2	40.0	25.0	43.8	0.1	0.0	0.3
North Port MSA	20	9,493,296	20.0	31,109	0.5	0.0	0.2	16.1	10.0	12.7	55.9	55.0	54.7	27.6	35.0	32.4	0.0	0.0	0.0
Orlando MSA	20	7,792,080	20.0	94,338	1.1	0.0	0.7	18.3	15.0	14.1	33.6	40.0	34.0	47.0	45.0	51.2	0.0	0.0	0.0
Tampa MSA	20	5,512,012	20.0	136,738	2.5	30.0	2.5	16.0	20.0	13.7	39.5	20.0	36.3	42.0	30.0	47.4	0.1	0.0	0.1
<b>Total</b>	<b>100</b>	<b>36,849,034</b>	<b>100.0</b>	<b>650,094</b>	<b>2.2</b>	<b>8.0</b>	<b>1.7</b>	<b>19.6</b>	<b>23.0</b>	<b>16.2</b>	<b>37.8</b>	<b>36.0</b>	<b>37.8</b>	<b>40.4</b>	<b>33.0</b>	<b>44.2</b>	<b>0.1</b>	<b>0.0</b>	<b>0.2</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cape Coral CSA	34	12,484,240	20.7	37,977	1.4	2.9	1.0	17.2	8.8	21.6	46.5	61.8	48.7	34.3	26.5	28.2	0.6	0.0	0.5
Miami CSA	40	14,400,067	24.4	123,432	2.8	2.5	2.9	21.2	47.5	21.4	32.3	20.0	32.9	42.7	30.0	41.9	1.0	0.0	1.0
North Port MSA	21	13,709,737	12.8	14,355	0.3	0.0	0.4	14.5	9.5	15.3	50.3	38.1	44.1	34.6	52.4	37.3	0.3	0.0	3.0
Orlando MSA	29	8,302,146	17.7	39,308	1.4	0.0	1.7	19.0	34.5	17.2	31.3	34.5	31.2	47.9	31.0	49.6	0.4	0.0	0.3
Tampa MSA	40	14,566,641	24.4	61,208	1.4	15.0	1.9	18.8	27.5	19.5	40.4	22.5	38.8	38.8	32.5	39.3	0.6	2.5	0.6
<b>Total</b>	<b>164</b>	<b>63,462,831</b>	<b>100.0</b>	<b>276,280</b>	<b>2.0</b>	<b>4.9</b>	<b>2.1</b>	<b>19.6</b>	<b>27.4</b>	<b>20.1</b>	<b>36.4</b>	<b>34.1</b>	<b>36.7</b>	<b>41.2</b>	<b>32.9</b>	<b>40.3</b>	<b>0.8</b>	<b>0.6</b>	<b>0.8</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cape Coral CSA	20	7,002,772	20.0	82,888	20.8	0.0	3.6	18.2	0.0	14.4	19.5	0.0	19.1	41.5	0.0	47.4	0.0	100.0	15.4
Miami CSA	20	7,048,874	20.0	305,021	22.8	0.0	2.7	17.2	0.0	10.6	17.9	0.0	18.5	42.1	0.0	50.2	0.0	100.0	18.0
North Port MSA	20	9,493,296	20.0	31,109	17.5	0.0	5.6	19.2	0.0	16.0	21.9	0.0	20.3	41.4	0.0	44.9	0.0	100.0	13.1
Orlando MSA	20	7,792,080	20.0	94,338	21.1	0.0	3.6	17.0	0.0	12.5	18.6	0.0	18.9	43.3	0.0	47.7	0.0	100.0	17.2
Tampa MSA	20	5,512,012	20.0	136,738	21.2	0.0	4.0	17.0	0.0	14.2	18.4	0.0	19.4	43.4	0.0	44.3	0.0	100.0	18.1
<b>Total</b>	<b>100</b>	<b>36,849,034</b>	<b>100.0</b>	<b>650,094</b>	<b>21.9</b>	<b>0.0</b>	<b>3.3</b>	<b>17.3</b>	<b>0.0</b>	<b>12.4</b>	<b>18.4</b>	<b>0.0</b>	<b>18.9</b>	<b>42.4</b>	<b>0.0</b>	<b>48.0</b>	<b>0.0</b>	<b>100.0</b>	<b>17.3</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cape Coral CSA	34	12,484,240	20.7	37,977	20.2	0.0	2.4	18.6	0.0	10.2	20.4	0.0	20.8	40.8	0.0	44.7	0.0	100.0	22.0
Miami CSA	40	14,400,067	24.4	123,432	22.2	0.0	2.3	17.6	0.0	7.4	18.1	0.0	15.2	42.1	0.0	51.4	0.0	100.0	23.6
North Port MSA	21	13,709,737	12.8	14,355	16.8	0.0	4.2	19.4	0.0	13.8	20.8	0.0	19.5	43.0	0.0	42.8	0.0	100.0	19.8
Orlando MSA	29	8,302,146	17.7	39,308	20.4	0.0	2.6	17.1	0.0	10.6	18.5	0.0	18.9	44.1	0.0	47.0	0.0	100.0	20.9
Tampa MSA	40	14,566,641	24.4	61,208	20.3	0.0	3.3	17.4	0.0	12.2	18.9	0.0	20.7	43.4	0.0	43.6	0.0	100.0	20.1
<b>Total</b>	<b>164</b>	<b>63,462,831</b>	<b>100.0</b>	<b>276,280</b>	<b>21.1</b>	<b>0.0</b>	<b>2.7</b>	<b>17.6</b>	<b>0.0</b>	<b>9.6</b>	<b>18.6</b>	<b>0.0</b>	<b>17.9</b>	<b>42.6</b>	<b>0.0</b>	<b>47.7</b>	<b>0.0</b>	<b>100.0</b>	<b>22.0</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cape Coral CSA	67	12,846	4.6	45,191	2.9	6.0	2.7	19.6	16.4	19.5	39.8	41.8	40.3	37.7	35.8	37.4	0.1	0.0	0.0
Miami CSA	1,207	192,658	83.1	418,504	4.1	7.2	4.4	21.9	23.5	23.2	29.5	26.7	29.6	43.3	40.3	41.7	1.2	2.2	1.1
North Port MSA	24	4,622	1.7	18,415	0.6	4.2	0.5	19.4	37.5	18.2	45.9	29.2	44.5	34.2	29.2	36.9	0.0	0.0	0.0
Orlando MSA	74	16,030	5.1	79,738	1.6	1.4	1.6	23.5	29.7	22.3	32.4	39.2	33.2	42.6	29.7	43.0	0.0	0.0	0.0
Tampa MSA	81	17,632	5.6	92,095	5.0	11.1	5.4	17.9	18.5	18.5	33.7	29.6	34.3	43.1	40.7	41.5	0.3	0.0	0.3
<b>Total</b>	<b>1,453</b>	<b>243,788</b>	<b>100.0</b>	<b>653,943</b>	<b>3.7</b>	<b>7.0</b>	<b>4.0</b>	<b>21.3</b>	<b>23.5</b>	<b>22.0</b>	<b>31.8</b>	<b>28.2</b>	<b>31.9</b>	<b>42.5</b>	<b>39.4</b>	<b>41.4</b>	<b>0.8</b>	<b>1.9</b>	<b>0.7</b>

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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cape Coral CSA	77	15,908	8.9	46,231	2.4	0.0	2.0	19.8	28.6	19.8	44.5	48.1	46.5	32.5	23.4	31.1	0.8	0.0	0.6
Miami CSA	613	146,019	70.7	384,041	2.9	7.3	2.9	22.2	33.0	21.7	29.2	26.4	29.7	43.0	29.2	43.3	2.6	4.1	2.4
North Port MSA	15	2,305	1.7	18,542	0.6	0.0	0.4	12.4	13.3	12.2	48.7	40.0	46.5	37.9	46.7	40.3	0.5	0.0	0.6
Orlando MSA	71	12,730	8.2	79,704	2.0	5.6	1.5	24.6	36.6	23.4	29.0	33.8	28.5	42.9	22.5	45.2	1.4	1.4	1.5
Tampa MSA	91	22,700	10.5	89,708	3.3	8.8	3.4	18.5	31.9	19.6	33.1	34.1	34.4	42.9	20.9	40.4	2.2	4.4	2.2
<b>Total</b>	<b>867</b>	<b>199,662</b>	<b>100.0</b>	<b>618,226</b>	<b>2.8</b>	<b>6.6</b>	<b>2.7</b>	<b>21.5</b>	<b>32.4</b>	<b>21.2</b>	<b>31.5</b>	<b>30.0</b>	<b>32.0</b>	<b>42.1</b>	<b>27.6</b>	<b>42.1</b>	<b>2.2</b>	<b>3.5</b>	<b>2.1</b>

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%



<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											
											<b>2021</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cape Coral CSA	67	12,846	4.6	45,191	93.3	40.3	46.2	2.0	52.2	4.7	7.5
Miami CSA	1,207	192,658	83.1	418,504	94.3	39.7	43.0	1.9	46.8	3.8	13.5
North Port MSA	24	4,622	1.7	18,415	93.2	45.8	49.9	2.1	50.0	4.7	4.2
Orlando MSA	74	16,030	5.1	79,738	93.1	29.7	44.9	2.0	56.8	4.9	13.5
Tampa MSA	81	17,632	5.6	92,095	92.7	28.4	45.8	2.3	59.3	5.0	12.3
<b>Total</b>	<b>1,453</b>	<b>243,788</b>	<b>100.0</b>	<b>653,943</b>	<b>93.8</b>	<b>38.7</b>	<b>44.0</b>	<b>2.0</b>	<b>48.3</b>	<b>4.2</b>	<b>13.0</b>
<i>Source: 2021 D&amp;B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											
											<b>2022-23</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Cape Coral CSA	77	15,908	8.9	46,231	93.7	31.2	51.8	1.5	68.8	4.8	0.0
Miami CSA	613	146,019	70.7	384,041	94.5	43.4	52.3	1.4	55.8	4.1	0.8
North Port MSA	15	2,305	1.7	18,542	93.5	53.3	54.1	1.7	46.7	4.9	0.0
Orlando MSA	71	12,730	8.2	79,704	93.6	53.5	51.6	1.5	46.5	4.9	0.0
Tampa MSA	91	22,700	10.5	89,708	93.5	39.6	51.5	1.6	59.3	4.9	1.1
<b>Total</b>	<b>867</b>	<b>199,662</b>	<b>100.0</b>	<b>618,226</b>	<b>94.2</b>	<b>42.9</b>	<b>52.1</b>	<b>1.5</b>	<b>56.4</b>	<b>4.4</b>	<b>0.7</b>
<i>Source: 2023 D&amp;B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

**New York**

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2021</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
New York MSA	20	23,177,275	100.0	131,739	2.9	10.0	3.6	19.4	5.0	19.6	41.7	40.0	42.2	35.8	45.0	34.5	0.2	0.0	0.2
<b>Total</b>	<b>20</b>	<b>23,177,275</b>	<b>100.0</b>	<b>131,739</b>	<b>2.9</b>	<b>10.0</b>	<b>3.6</b>	<b>19.4</b>	<b>5.0</b>	<b>19.6</b>	<b>41.7</b>	<b>40.0</b>	<b>42.2</b>	<b>35.8</b>	<b>45.0</b>	<b>34.5</b>	<b>0.2</b>	<b>0.0</b>	<b>0.2</b>

*Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2022-23</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
New York MSA	40	45,075,304	100.0	57,663	2.7	2.5	2.9	19.1	15.0	19.6	42.5	35.0	39.7	34.8	45.0	36.8	0.9	2.5	1.0
<b>Total</b>	<b>40</b>	<b>45,075,304</b>	<b>100.0</b>	<b>57,663</b>	<b>2.7</b>	<b>2.5</b>	<b>2.9</b>	<b>19.1</b>	<b>15.0</b>	<b>19.6</b>	<b>42.5</b>	<b>35.0</b>	<b>39.7</b>	<b>34.8</b>	<b>45.0</b>	<b>36.8</b>	<b>0.9</b>	<b>2.5</b>	<b>1.0</b>

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
New York MSA	20	23,177,275	100.0	131,739	29.4	0.0	3.6	16.1	0.0	14.1	16.9	0.0	19.6	37.6	0.0	49.9	0.0	100.0	12.7
<b>Total</b>	<b>20</b>	<b>23,177,275</b>	<b>100.0</b>	<b>131,739</b>	<b>29.4</b>	<b>0.0</b>	<b>3.6</b>	<b>16.1</b>	<b>0.0</b>	<b>14.1</b>	<b>16.9</b>	<b>0.0</b>	<b>19.6</b>	<b>37.6</b>	<b>0.0</b>	<b>49.9</b>	<b>0.0</b>	<b>100.0</b>	<b>12.7</b>

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2022-23**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
New York MSA	40	45,075,304	100.0	57,663	27.1	0.0	3.9	15.6	0.0	12.0	16.9	0.0	15.1	40.5	0.0	34.7	0.0	100.0	34.2
<b>Total</b>	<b>40</b>	<b>45,075,304</b>	<b>100.0</b>	<b>57,663</b>	<b>27.1</b>	<b>0.0</b>	<b>3.9</b>	<b>15.6</b>	<b>0.0</b>	<b>12.0</b>	<b>16.9</b>	<b>0.0</b>	<b>15.1</b>	<b>40.5</b>	<b>0.0</b>	<b>34.7</b>	<b>0.0</b>	<b>100.0</b>	<b>34.2</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
New York MSA	121	46,883	100.0	282,289	6.9	3.3	6.9	20.0	18.2	19.9	24.1	14.1	25.5	46.3	61.2	44.9	2.7	3.3	2.7
<b>Total</b>	<b>121</b>	<b>46,883</b>	<b>100.0</b>	<b>282,289</b>	<b>6.9</b>	<b>3.3</b>	<b>6.9</b>	<b>20.0</b>	<b>18.2</b>	<b>19.9</b>	<b>24.1</b>	<b>14.1</b>	<b>25.5</b>	<b>46.3</b>	<b>61.2</b>	<b>44.9</b>	<b>2.7</b>	<b>3.3</b>	<b>2.7</b>

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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
New York MSA	105	35,040	100.0	252,864	6.9	22.9	6.9	18.4	42.9	19.4	25.9	15.2	27.8	43.6	17.1	40.9	5.3	1.9	5.0
<b>Total</b>	<b>105</b>	<b>35,040</b>	<b>100.0</b>	<b>252,864</b>	<b>6.9</b>	<b>22.9</b>	<b>6.9</b>	<b>18.4</b>	<b>42.9</b>	<b>19.4</b>	<b>25.9</b>	<b>15.2</b>	<b>27.8</b>	<b>43.6</b>	<b>17.1</b>	<b>40.9</b>	<b>5.3</b>	<b>1.9</b>	<b>5.0</b>

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2021**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
New York MSA	121	46,883	100.0	282,289	90.4	6.6	35.5	4.1	68.6	5.5	24.8
<b>Total</b>	<b>121</b>	<b>46,883</b>	<b>100.0</b>	<b>282,289</b>	<b>90.4</b>	<b>6.6</b>	<b>35.5</b>	<b>4.1</b>	<b>68.6</b>	<b>5.5</b>	<b>24.8</b>

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

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
New York MSA	105	35,040	100.0	252,864	92.8	60.0	46.8	3.0	40.0	4.2	0.0
<b>Total</b>	<b>105</b>	<b>35,040</b>	<b>100.0</b>	<b>252,864</b>	<b>92.8</b>	<b>60.0</b>	<b>46.8</b>	<b>3.0</b>	<b>40.0</b>	<b>4.2</b>	<b>0.0</b>

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Texas

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Dallas MSA	40	15,851,030	100.0	36,391	10.5	7.5	11.8	32.6	40.0	29.2	29.1	35.0	30.6	27.4	17.5	27.7	0.4	0.0	0.7
<b>Total</b>	<b>40</b>	<b>15,851,030</b>	<b>100.0</b>	<b>36,391</b>	<b>10.5</b>	<b>7.5</b>	<b>11.8</b>	<b>32.6</b>	<b>40.0</b>	<b>29.2</b>	<b>29.1</b>	<b>35.0</b>	<b>30.6</b>	<b>27.4</b>	<b>17.5</b>	<b>27.7</b>	<b>0.4</b>	<b>0.0</b>	<b>0.7</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Dallas MSA	40	15,851,030	100.0	36,391	30.4	0.0	5.6	20.1	0.0	17.3	18.5	0.0	18.8	31.1	0.0	35.2	0.0	100.0	23.2
<b>Total</b>	<b>40</b>	<b>15,851,030</b>	<b>100.0</b>	<b>36,391</b>	<b>30.4</b>	<b>0.0</b>	<b>5.6</b>	<b>20.1</b>	<b>0.0</b>	<b>17.3</b>	<b>18.5</b>	<b>0.0</b>	<b>18.8</b>	<b>31.1</b>	<b>0.0</b>	<b>35.2</b>	<b>0.0</b>	<b>100.0</b>	<b>23.2</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** **2022-23**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Dallas MSA	16	900	100.0	83,836	8.6	6.3	8.7	22.5	62.5	25.2	29.1	12.5	30.4	38.7	18.8	34.8	1.1	0.0	0.9
<b>Total</b>	<b>16</b>	<b>900</b>	<b>100.0</b>	<b>83,836</b>	<b>8.6</b>	<b>6.3</b>	<b>8.7</b>	<b>22.5</b>	<b>62.5</b>	<b>25.2</b>	<b>29.1</b>	<b>12.5</b>	<b>30.4</b>	<b>38.7</b>	<b>18.8</b>	<b>34.8</b>	<b>1.1</b>	<b>0.0</b>	<b>0.9</b>

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2022-23**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Dallas MSA	16	900	100.0	83,836	91.5	87.5	46.4	2.8	0.0	5.8	12.5
<b>Total</b>	<b>16</b>	<b>900</b>	<b>100.0</b>	<b>83,836</b>	<b>91.5</b>	<b>87.5</b>	<b>46.4</b>	<b>2.8</b>	<b>0.0</b>	<b>5.8</b>	<b>12.5</b>

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0%