PUBLIC DISCLOSURE

August 25, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Fieldpoint Private Bank & Trust
RSSD No. 3664588

One Greenwich Plaza Suite A, 2nd Floor
Greenwich, CT 06830

Federal Reserve Bank of New York

33 Liberty Street
New York, New York 10045

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

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INSTITUTION'S CRA RATING

THIS INSTITUTION IS RATED: Needs to Improve

The Lending Test is rated: Needs to Improve
The Community Development Test is rated: Satisfactory

SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS

The major factors supporting the bank's rating include:

LENDING TEST

- A majority of loans and other lending related activities were outside the bank's assessment area.

- The geographic distribution of loans reflected poor penetration through the assessment area.

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

- The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the rating.

COMMUNITY DEVELOPMENT TEST

- The bank's community development performance demonstrated adequate responsiveness to community development loans, qualified investments, and community development services, as appropriate considering the bank's capacity and the need and availability of such opportunities in the bank's assessment area.

INSTITUTION

DESCRIPTION OF INSTITUTION

Fieldpoint Private Bank & Trust (FPBT or the bank) is a state-member bank, headquartered in Greenwich, Connecticut (CT), and is a wholly owned subsidiary of Fieldpoint Private Holdings. FPBT offers banking products to various commercial and retail customers, including wealth management and investment advisory services for high-net-worth clients.

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

FPBT operates three full-service branches, one located in Greenwich, CT, one in New York, New York (NY), and one in Atlanta, Georgia (GA). FPBT serves its customers at all branches by appointment only. FPBT does not maintain any automated teller machines (ATMs) or loan production offices. Notably, the bank closed its Winter Park, FL branch on March 31, 2024.

Based on the June 30, 2025, Federal Financial Institutions Examination Council's (FFIEC) Consolidated

Report of Condition and Income (Call Report), FPBT's loan portfolio by dollar volume consisted of a mix of residential and commercial loans, as summarized in the following table.

Loan Portfolio		
Loan Type	**$(000's)**	**%**
1-4 Family Residential Real Estate	314,117	39.2
Construction	23,846	3.0
Multifamily (5 or more units) Residential Real Estate	19,994	2.5
Home Equity Line of Credit	$58,009	7.2
Consumer	$54,858	6.8
Agricultural Production	$0	0.0
Commercial & Industrial	$107,837	13.4
Nonfarm Nonresidential Secured	$222,718	27.8
Other	$1,000	0.1
Total Loans	**$802,379**	**100.0**
Source: Call Report as of June 30, 2025		

Based on the June 30, 2025, Uniform Bank Performance Report (UBPR), FPBT's deposit portfolio by dollar volume was comprised primarily of broker and time deposits, as summarized in the following table.

Deposit Portfolio		
Deposit Type	**$(000's)**	**%**
Demand Deposits	$264,683	21.1
All NOW and ATS	$23,627	1.9
Money Market Deposits	$89,543	7.1
Other Savings Deposits	$98,263	7.8
Time Deposits at or below Insurance Limit	$348,778	27.8
Time Deposits Above Insurance Limit	$37,432	3.0
Brokered Deposits	$392,343	31.3
Total Deposits	**$1,254,669**	**100.0**
Source: UBPR as of June 30, 2025		

Previous Public Evaluation

The Federal Reserve Bank of NY assigned a rating of Needs to Improve, at the prior CRA Performance Evaluation dated January 16, 2024, using the FFIEC Intermediate Small Institution CRA Examination Procedures. The Lending Test was rated Needs to Improve and the Community Development Test was rated Satisfactory.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more assessment areas within which examiners will evaluate its CRA performance. FPBT delineated the following four assessment areas.

Examiners conducted a full scope review in each of the four assessment areas. Since the prior evaluation dated January 16, 2024, there have been changes to the bank's assessment area.

1. **MSA 14860 (Bridgeport-Stamford-Danbury, CT)**. Effective January 1, 2024, CT redefined its county structure by adopting nine planning regions as county-equivalent entities for statistical and

administrative purposes. In addition, the Office of Management and Budget (OMB) changed the MSA delineation from MSA 14860 (Bridgeport-Stamford-Norwalk, CT) to MSA 14860 (Bridgeport-Stamford-Danbury, CT). The new MSA consists of two planning regions, the Greater Bridgeport Planning Region and the Western Connecticut Planning Region, which the bank designated in full as its assessment area.

2. **MD 35614 (New York-Jersey City-White Plains, NY-NJ)**. The assessment area is composed of the entire NY County. There were no changes to this assessment area.

3. **MD 12054 (Atlanta-Sandy Springs-Roswell, GA).** The assessment area is composed of the entire Fulton County. This MD was created as part of the January 1, 2024 OMB MSA delineation changes. Fulton County is now within MD 12054 and still within the broader MSA 12060 (Atlanta-Sandy Springs-Alpharetta, GA).

4. **MSA 36740 (Orlando-Kissimmee-Sanford, FL)**. The assessment area is composed of the entire Orange County. However, the bank removed this assessment area following the closure of the Winter Park, FL branch on March 31, 2024. Nonetheless, examiners considered the bank's performance and activities in this assessment area since the branch was opened for most of the review period.

The bank's assessment areas were in compliance with the requirements of Section 228.41 of Regulation BB. Maps illustrating the bank's assessment areas are in Appendix A.

SCOPE OF EVALUATION

Procedures

To assess FPBT's CRA performance, examiners applied the FFIEC's Intermediate Small Institution CRA Examination Procedures. These procedures consist of the Lending Test and the Community Development Test. The evaluation considered the performance context, including the bank's asset size, financial condition, market competition, assessment area demographics, and credit and community development needs.

Products

During this evaluation, loans reported under the Home Mortgage Disclosure Act (HMDA), collectively referred to as home mortgage, as well as small business loans reported under CRA were analyzed, as these loan types represented the major product lines based on a review of bank records and loan portfolio composition. Construction, consumer, and small farm loans were excluded from the evaluation as they did not represent a major product line or provide material support for conclusions or ratings.

For the Lending Test, home mortgage loans included home purchase, home refinance, and home improvement, which examiners combined and analyzed collectively, as individually, the loan volumes were insufficient to provide a meaningful analysis. The small business loans included commercial real estate loans, commercial and industrial loans, and lines of credit in amounts of $1.0 million or less. Examiners verified the integrity of the bank's HMDA- and CRA-reportable data from January 1, 2023 through December 31, 2024.

For the Community Development Test, examiners analyzed community development loans, investments and grants, and services. Multifamily loans considered in the retail lending test were also considered in the evaluation of community development.

Evaluation Period

The evaluation covered activities since the prior evaluation dated January 16, 2024. Examiners reviewed the bank's home mortgage loans and small business loans originated between January 1, 2023 through December 31, 2024. The bank's community development test included community development loans, qualified investments and philanthropic grants, and community development services from January 1, 2024 through December 31, 2024. Investments also included qualified investments and grants made during the current evaluation period and the current book value of any qualified investments outstanding from the prior evaluation.

Lending Analysis

Under the Lending Test, geographic and borrower loan distribution analyses were based on loan activity inside the assessment area. The bank's home mortgage and small business lending was compared to the U.S. Department of Commerce's Bureau of the Census 2020 (2020 U.S. Census) demographic data and Dun & Bradstreet (D&B) demographic data, respectively. Aggregate home mortgage lending and CRA-reportable small business lending data for 2023 and 2024, were also used. Aggregate lenders for HMDA data included all lenders required to report HMDA-while aggregate lenders for CRA data included all lenders required to report CRA-reportable small business lending data within the assessment areas.

To evaluate the geographic distribution of loans, the proportion of home mortgage loan originations in low- and moderate-income (LMI) geographies was compared with the proportion of owner-occupied housing units located in LMI geographies. For small business loans, analysis compared the proportion of loan originations in LMI geographies with the proportion of small businesses located in LMI geographies as reported by D&B data. Performance in LMI geographies were analyzed separately. The lending analysis also considered lending opportunities in LMI census tracts as indicated by demographic data and aggregate lending patterns.

To analyze the distribution of home mortgage lending by borrower profile, the proportion of originations to LMI borrowers was compared to the proportion of LMI families residing in the assessment area. Median family income (MFI) estimates from the FFIEC were used to categorize borrower income. For small business lending, FPBT's proportion of loans to businesses with gross annual revenues (GAR) of $1.0 million or less, based on D&B data, were compared to the proportion of all such businesses located in the respective assessment areas.

Community Development Activity Analysis

Community development activities were reviewed to determine whether activities had community development as a primary purpose and whether the community development activities benefited the bank's assessment area. The eligibility of a loan, investment, or service as a community development activity was based on demographic information at the time the community development activity was undertaken. Qualified community development activities were analyzed from both the quantitative and qualitative perspectives to understand the volume of activity impacting a particular assessment area, the innovativeness of those activities, and the responsiveness to local community development and credit needs. When appropriate, peer comparisons were conducted using annualized metrics to gauge the relative performance of the bank in a particular assessment area.

Deriving Overall Conclusions

Examiners conducted a full scope review of all four assessment areas. In determining the overall rating, examiners weighed the assessment areas based on the bank's concentration of deposits, branches, and overall lending activity. Thus, FPBT's performance in MSA 14860 (Bridgeport-Stamford-Danbury, CT), MD 35614

(New York-Jersey City-White Plains, NY-NJ), and MD 12054 (Atlanta-Sandy Springs-Roswell, GA) assessment areas received more weight in determining the overall rating. The remaining assessment area, MSA 36740 (Orlando-Kissimmee-Sanford, FL), did not have a substantial effect on the overall rating based on lower deposits, lending volumes, and market presence. When evaluating the bank's performance under the Lending Test, examiners placed more weight on home mortgage loans when compared to small business loans based on the number of originations. Demographic and economic information was considered in the bank's performance context and is discussed in detail within each assessment area.

Community Contacts

To learn more about community credit needs, examiners conducted interviews with representatives from four community organizations. The contacts had expertise in their respective fields and were familiar with the economic, social, and demographic characteristics and community development opportunities in their respective areas. Information obtained from these interviews provided performance context for the communities in which FPBT operated. Please refer to the Community Contact section within each assessment area for more details.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

The conclusions within this section present the bank's performance at the institution level. Please refer to the individual assessment area sections for more details.

LENDING TEST

FPBT's overall performance under the Lending Test was rated Needs to Improve. This conclusion was based on the Needs to Improve performance in all rated areas and driven by the limited lending conducted in the bank's assessment area, particularly in LMI census tracts and to LMI borrowers and small businesses.

Loan-to-Deposit Ratio

The loan-to-deposit (LTD) ratio was more than reasonable (considering seasonal variations and taking into account lending-related activities) given the bank's size, financial condition, and assessment area credit needs. FPBT' s average LTD ratio for the ten quarters from January 1, 2023 to June 30, 2025, was 103.3%, which was 12.2% higher compared to the previous evaluation's 24-quarter average of 91.1%. The bank's average LTD ratio ranked second when compared to four similarly situated banks.

Loan-to-Deposit Ratio Comparison		
	Total Assets as of 6/30/2025 ($000's)	**Average Net LTD Ratio (%)**
FPBT	$1,079,926	103.3
Fairfield County Bank	$1,830,497	92.05
Hanover Community Bank	$2,310,694	103.8
BankSouth	$1,339,277	95.0
Florida Capital Bank	$655,184	98.4
Source: Call Report January 1, 2023 through June 30, 2025		

Assessment Area Concentration

A majority of loans and other lending related activities were outside the bank's assessment areas. As shown in the table below, the bank originated 33.9% of its loans by number and 36.5% by dollar volume inside the assessment area. Compared to the prior evaluation, this performance represented a decrease in number and dollar volume, which was 40.8% by number and 43.6% by dollar volume. This limited lending activity within the assessment area reflected poor responsiveness to the credit needs of the communities served by the bank.

The bank's lending inside and outside the assessment areas is summarized in the table below.

Lending Inside and Outside the Assessment Areas								
	Inside				Outside			
Loan Type	**#**	**%**	**$(000's)**	**%**	**#**	**%**	**$(000's)**	**%**
Home Purchase	6	33.3	$14,979	36.3	12	66.7	$26,304	63.7
Multifamily	2	28.6	$8,111	36.2	5	71.4	$14,275	63.8
Home Refinance	6	35.3	$10,660	39.1	11	64.7	$16,634	60.9
Total Home Mortgage	**14**	**33.3**	**$33,750**	**37.1**	**28**	**66.7**	**$57,213**	**62.9**
Total Small Business	**5**	**35.7**	**$2,050**	**28.8**	**9**	**64.3**	**$5,068**	**71.2**
TOTAL LOANS	**19**	**33.9**	**$35,800**	**36.5**	**37**	**66.1**	**$62,281**	**63.5**
Source: HMDA- and CRA-reported data January 1, 2023 to December 31, 2024								

Geographic Distribution of Loans

The geographic distribution of loans reflected poor penetration throughout the assessment areas. This conclusion was primarily based on poor performance in CT and NY rated areas, and very poor performance in GA rated area, which combined contributed the most to the overall conclusion. Performance in FL was also poor but contributed the least to the overall conclusion.

Borrower Profile

The distribution of borrowers reflected, given the demographics of the assessment areas, poor penetration among individuals of different income levels (including LMI) and businesses of different sizes. This conclusion was primarily based on poor performance in the CT, NY and GA rated areas, which contributed to the overall conclusion. Performance in FL was also poor but contributed the least to the overall conclusion.

Response to Complaints

The bank did not receive any CRA-related complaints since the previous evaluation; therefore, this factor did not affect the rating.

COMMUNITY DEVELOPMENT TEST

FPBT's performance under the Community Development Test was rated Satisfactory.

The bank's community development performance demonstrated adequate responsiveness to community development loans, qualified investments, and community development services, as appropriate considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area. This conclusion was based on the bank's Satisfactory performance in the CT and GA rated areas, and Needs to Improve performance in NY rated area, all of which contributed the most to the overall conclusion. Performance in the FL rated area was Needs to Improve but contributed the least to the overall conclusion.

Community Development Loans

In 2024, FPBT originated 2 community development loans totaling approximately $4.8 million, which represented 0.4% of average total assets and 4.9% of average total loans. Community development loans, by dollar volume, were primarily efforts to revitalize and stabilize low- and moderate-income geographies.

The table below illustrates the bank's community development loan activity by assessment area and purpose.

Community Development Loans by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000's)	#	$(000's)	#	$(000's)	#	$(000's)	#	$(000's)
MSA 14860 (Bridgeport-Stamford-Danbury, CT)	0	0	1	$666	0	0	0	0	**1**	**$666**
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	0	0	0	0	0	0	0	0	**0**	**0**
MD 12054 (Atlanta-Sandy Springs-Roswell, GA)	0	0	0	0	0	0	1	$4,125	**1**	**$4,125**
MSA 36740 (Orlando-Kissimmee-Sanford, FL)	0	0	0	0	0	0	0	0	**0**	**0**
Total	**0**	**0**	**1**	**$666**	**0**	**0**	**1**	**$4,125**	**2**	**$4,791**
Source: Bank data January 1, 2024 to December 31, 2024										

Community Development Investments and Grants

During the evaluation period, the bank reported 2 qualified community development investments and 7 grants totaling approximately $2.0 million. All of the bank's qualified investments were prior period investments with a current balance of $1.9 million, which benefited the NY and CT assessment areas. Grants totaled $31,000, which primarily benefited LMI individuals in CT, GA, and NY assessment areas. While FPBT did not make any new investments during the evaluation period, 93.5% of new grants benefited community development organizations that offered services to LMI individuals, a need identified by a community contact.

The table below illustrates the bank's community development investment and grant activity by assessment area and purpose.

Community Development Investments and Grants by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000's)	#	$(000's)	#	$(000's)	#	$(000's)	#	$(000's)
MSA 14860 (Bridgeport-Stamford-Danbury, CT)	0	0	3	$10	1	$2	0	0	**4**	**$12**
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	1	$981	2	$4	0	0	0	0	**3**	**$985**
MD 12054 (Atlanta-Sandy Springs-Roswell, GA)	0	0	1	$15	0	0	0	0	**1**	**$15**
MSA 36740 (Orlando-Kissimmee-Sanford, FL)	0	0	0	0	0	0	0	0	**0**	**0**
BSRA	0	0	0	0	1	$960	0	0	**1**	**$960**
Total	**1**	**$981**	**6**	**$29**	**2**	**$962**	**0**	**0**	**9**	**$1,972**
Source: Bank data January 1, 2024 to December 31, 2024										

Community Development Services

During the evaluation period, FPBT provided 46 community development services, primarily addressing community service needs. Community development services supported efforts to serve LMI individuals, a need expressed by community contact.

The table below illustrates the bank's community development services by assessment area and purpose.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
MSA 14860 (Bridgeport-Stamford-Danbury, CT)	0	6	0	0	**6**
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	0	28	0	0	**28**
MD 12054 (Atlanta-Sandy Springs-Roswell, GA)	0	12	0	0	**12**
MSA 36740 (Orlando-Kissimmee-Sanford, FL)	0	0	0	0	**0**
Total	**0**	**46**	**0**	**0**	**46**
Source: Bank data January 1, 2024 to December 31, 2024					

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

CONNECTICUT STATE

CRA RATING FOR CONNECTICUT STATE: Needs to Improve

The Lending Test is rated: Needs to Improve
The Community Development Test is rated: Satisfactory

SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS

The major factors supporting the bank's rating include:

LENDING TEST

- The geographic distribution of loans reflected poor penetration through the assessment area.

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

COMMUNITY DEVELOPMENT TEST

- The bank's community development performance demonstrated adequate responsiveness to community development loans, qualified investments, and community development services, as appropriate considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS

The bank's CT operations were entirely within the MSA 14860 (Bridgeport-Stamford-Danbury, CT). Please refer to the Description of Institution's Operations under MSA 14860 (Bridgeport-Stamford-Danbury, CT) Full Scope Review.

SCOPE OF EVALUATION

The evaluation of FPBT's activities in CT consisted of a full scope review of the MSA 14860 (Bridgeport-Stamford-Danbury, CT) assessment area. This assessment area was evaluated under full scope procedures as it is the only assessment area in CT.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding the bank's performance in CT were solely based on the performance in the MSA 14860 (Bridgeport-Stamford-Danbury, CT) assessment area. Specific comments regarding the lending and community development tests were discussed under the MSA 14860 (Bridgeport-Stamford-Danbury, CT) Full Scope Review.

MSA 14860 (BRIDGEPORT-STAMFORD-DANBURY, CT) FULL SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

FPBT operated 1 (33.3 %) of its 3 branches in this assessment area during the evaluation period.

According to the June 30, 2024 FDIC Summary of Deposit Report, 26 institutions operated 274 offices within this assessment area. FPBT ranked 14th with approximately $821.0 million in deposits, which represented 1.2% of the deposit market share and accounted for 89.7% of the bank's total branch deposits. This assessment area generated approximately 8.9% by number and 16.2% by dollar volume of the bank's combined total lending activity from January 1, 2023 to December 31, 2024. Competitors included large financial institutions, such as Webster Bank, N.A., Manufacturers and Traders Trust Company, Bank of America, N.A., JP Morgan Chase N.A., and Wells Fargo, N.A., which captured 74.5% of the deposit market share.

SCOPE OF EVALUATION

Procedures

Examiners used full scope review examination procedures to evaluate the bank's performance in this assessment area.

PERFORMANCE CONTEXT

Demographic Characteristics

The assessment area included the Greater Bridgeport Planning and the Western Connecticut Planning Regions. According to the 2020 U.S. Census, the population of this assessment area was 946,327. The assessment area consisted of 225 census tracts, of which 34 or 15.1% were low-income, 47 or 20.9% were moderate-income, 53 or 23.6% were middle-income, 88 or 39.1% were upper-income, and 3 or 1.3% were unknown-income.

Income Characteristics

Based on the 2020 U.S. Census, the assessment area had 236,414 families, of which 25.0% were low-income (6.4% of which were below the poverty level), 15.2% were moderate-income, 17.7% were middle-income, and 42.1% were upper-income.

The table below depicts the MFI's for the assessment area.

Median Family Income			
Area	**2015 MFI**	**2020 MFI**	**% Change**
Assessment Area	$114,835	$119,192	3.8
Greater Bridgeport Planning Region, CT	$90,152	$95,653	6.1
Western Connecticut Planning Region, CT	$129,339	$133,196	3.0
State of CT	$97,273	$102,061	4.9
Source: 2015 ACS and 2020 U.S. Census; MFIs have been inflation-adjusted and expressed in 2020 dollars.			

Housing Characteristics

Based on the 2020 U.S. Census, the assessment area had 369,424 housing units, of which 61.1% were owner-occupied, 30.8% were rental, and 8.1% were vacant. Of the total housing units, 13.2% were located in low-income census tracts, 23.7% in moderate-income census tracts, 26.5% in middle-income census tracts, 36.4% in upper-income census tracts, and 0.2% in unknown-income census tracts. In low-income census tracts, 25.8% of housing units were owner-occupied, 63.9% were rental units, and 10.3% were vacant. In moderate-income census tracts, 46.6% of housing units were owner-occupied, 45.0% were rental units, and 8.4% were vacant.

The median age of housing stock in this assessment area was 56 years old, with 27.9% of the stock built before 1950. The median age of housing stock was 61 years in low-income census tracts and 61 years in moderate-income census tracts. According to the 2020 U.S. Census, the median housing value in this assessment area was $435,989 with an affordability ratio of 22.2. The median gross rent in the assessment area was $1,509 per month.

Housing Characteristics			
Geographic Area	**2020 Median Housing Value**	**2020 Affordability Ratio**	**2020 Median Gross Rent**
Assessment Area	$435,989	22.2	$1,509
State of CT	$279,700	28.6	$1,201
Source: 2020 U.S. Census *Housing Characteristics data for MSA 14860 and the planning regions were not available.*			

Housing Cost Burden

Housing costs were relatively expensive in this assessment area, which indicated that affordable housing for LMI individuals and families continued to be a challenge. According to the U.S. Department of Housing and Urban Development (HUD), within the assessment area, 49.2% of all rental households had rental costs that exceeded 30.0% of their incomes, 77.6% of low-income rental households had rental costs that exceeded 30.0% of their income, and 47.2% of moderate-income rental households had rental costs that exceeded 30.0% of their income.

According to HUD, within this assessment area, 30.0% of homeowners had housing costs that exceeded 30.0% of their incomes, 82.9% of low-income homeowners had housing costs that exceeded 30.0% of their income, and 58.8% of moderate-income homeowners had housing costs that exceeded 30.0% of their income. See the table below for more details.

Housing Cost Burden*						
Area	**Cost Burden-Renters**			**Cost Burden-Owners**		
	Low Income	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Assessment Area	77.6%	47.2%	49.2%	82.9%	58.8%	30.0%
State of CT	75.0%	37.4%	46.2%	80.2%	48.5%	25.6%
**Housing Cost Burden is housing cost that equals 30.0% or more of household income. Housing Cost Burden data for MSA 14860 and the planning regions were not available.* *Source: HUD 2017-2021 Comprehensive Housing Affordability Strategy*						

Labor, Employment and Economic Characteristics

According to D&B, there were 57,832 businesses operating in this assessment area in 2024, of which 8.2% were located in low-income census tracts and 20.4% were located in moderate-income census tracts. Of the total businesses operating in the assessment area, 91.3% were small businesses with GAR of $1.0 million or less, of which 8.1% were located in low-income census tracts and 20.1% were located in moderate-income census tracts.

According to the BLS, unemployment rates in the assessment area and the state of CT remained flat during the evaluation period. See the table below for more details.

Unemployment Rates		
Area	**2023**	**2024**
Assessment Area	3.1%	3.1%
Greater Bridgeport Planning Region, CT	3.6%	3.6%
Western Connecticut Planning Region, CT	2.8%	2.8%
State of CT	3.2%	3.2%
Source: BLS, Local Area Unemployment Statistics		

Additional performance context for this assessment area is provided in the following table.

Assessment Area Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	34	15.1	27,177	11.5	5,748	21.2	59,071	25.0
Moderate	47	20.9	50,280	21.3	5,025	10.0	35,843	15.2
Middle	53	23.6	63,376	26.8	2,054	3.2	41,954	17.7
Upper	88	39.1	95,252	40.3	2,092	2.2	99,546	42.1
Unknown	3	1.3	329	0.1	172	52.3	0	0
Total Assessment Area	**225**	**100.0**	**236,414**	**100.0**	**15,091**	**6.4**	**236,414**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low	48,632	12,565	5.6	25.8	31,054	63.9	5,013	10.3
Moderate	87,725	40,917	18.1	46.6	39,480	45.0	7,328	8.4
Middle	97,786	68,639	30.4	70.2	21,397	21.9	7,750	7.9
Upper	134,518	103,548	45.9	77.0	21,242	15.8	9,728	7.2
Unknown	763	97	0	12.7	561	73.5	105	13.8
Total Assessment Area	**369,424**	**225,766**	**100.0**	**61.1**	**113,734**	**30.8**	**29,924**	**8.1**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1.0 Million		**Over $1.0 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	4,763	8.2	4,263	8.1	465	10.7	35	5.2
Moderate	11,773	20.4	10,592	20.1	1,099	25.2	82	12.3
Middle	13,630	23.6	12,631	23.9	873	20.0	126	18.8
Upper	27,628	47.8	25,289	47.9	1,914	43.9	425	63.5
Unknown	38	0.1	33	0.1	4	0.1	1	0.1
Total Assessment Area	**57,832**	**100.0**	**52,808**	**100.0**	**4,355**	**100.0**	**669**	**100.0**
	% of Total Businesses:			**91.3**		**7.5**		**1.2**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1.0 Million		**Over $1.0 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	16	5.1	16	5.2	0	0	0	0
Moderate	36	11.4	34	11.0	2	33.3	0	0
Middle	74	23.4	74	23.9	0	0	0	0
Upper	190	60.1	186	60.0	4	66.7	0	0
Unknown	0	0	0	0	0	0	0	0
Total Assessment Area	**316**	**100.0**	**310**	**100.0**	**6**	**100.0**	**0**	**0**
	% of Total Farms:			**98.1**		**1.9**		**0**
Source: 2024 FFIEC and 2024 D&B								

Community Contact

Examiners conducted a community contact interview with a representative from an affordable housing organization that serves this assessment area. The organization provides housing, meals, and homeless prevention services to LMI individuals within the bank's assessment area. The representative noted that LMI individuals are experiencing housing affordability challenges due to increasing housing rental costs coupled with stagnant wages. The contact further noted that potential reductions in subsidies for the Supplemental Nutrition Assistance Program (formerly known as food stamps) may place a further income strain on low-income families. The contact identified affordable housing and access to essential services as key community development needs within the assessment area.

Considering information from the community contact, as well as regional demographic and economic data, examiners determined that affordable housing and flexible credit represented the primary community development need in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

FPBT's performance under the Lending Test was rated Needs to Improve. This conclusion was principally based on the poor geographic distribution of loans in LMI census tracts and the poor penetration among individuals of different income levels and businesses of different sizes.

Geographic Distribution of Loans

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

<u>Gap Analysis</u>

During the evaluation period, the bank did not originate any home mortgage loans in low-income census tracts. In 2023, FPBT originated one home mortgage loan in a moderate-income census tract. Additionally, FPBT did not originate any small business loans in LMI census tracts. As a result, lending penetration in LMI census tracts reflected poor performance.

The bank's lending gap analysis in the assessment area is summarized in the table below.

Lending Gap Analysis			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration %**
2024			
Low	34	34	0
Moderate	47	47	0
Middle	53	53	0
Upper	88	86	2.3
Unknown	3	3	0
2023			
Low	35	35	0
Moderate	46	45	2.2
Middle	59	59	0
Upper	85	84	1.2
Unknown	2	2	0
Source: FFIEC and Bank data January 1, 2023 to December 31, 2024			

Home Mortgage Loans

During the evaluation period, the bank did not originate any home mortgage loans in low-income census tracts and only one loan in moderate-income census tracts, which reflected poor penetration throughout the assessment area.

Geographic Distribution of Home Mortgage Loans							
Geographic Income Level	**Bank And Aggregate Loans**						**Owner-Occupied Units %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
Low							
2024	0	0	6.1	0	0	4.8	5.6
2023	0	0	5.8	0	0	3.3	5.6
Moderate							
2024	0	0	19.3	0	0	12.0	18.1
2023	1	33.3	17.5	405	3.9	10.1	17.1
Middle							
2024	0	0	29.4	0	0	21.9	30.4
2023	0	0	30.6	0	0	18.3	33.8
Upper							
2024	2	100.0	45.1	5,500	100.0	61.2	45.9
2023	2	66.7	46.1	9,937	96.1	68.2	43.4
Unknown							
2024	0	0	0.1	0	0	0.1	0
2023	0	0	0.1	0	0	0.1	0
Totals							
2024	**2**	**100.0**	**100.0**	**5,500**	**100.0**	**100.0**	**100.0**
2023	**3**	**100.0**	**100.0**	**10,342**	**100.0**	**100.0**	**100.0**
Source: 2023-2024 FFIEC; 2020 U.S. Census							

Small Business Loans

During the evaluation period, the bank did not originate any small business loans in LMI tracts, which reflected poor penetration throughout the assessment area.

Geographic Distribution of Small Business Loans							
Geographic Income Level	**Bank And Aggregate Loans**						**Total Businesses %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
Low							
2024	0	0	8.7	0	0	9.1	8.2
2023	0	0	9.1	0	0	9.7	8.7
Moderate							
2024	0	0	21.5	0	0	23.9	20.4
2023	0	0	20.9	0	0	22.5	19.2
Middle							
2024	0	0	23.9	0	0	21.7	23.6
2023	0	0	26.2	0	0	24.8	26.8
Upper							
2024	0	0	45.5	0	0	45.0	47.8
2023	0	0	43.3	0	0	42.7	45.2
Unknown							
2024	0	0	0	0	0	0	0.1
2023	0	0	0.1	0	0	0	0.1
Totals							
2024	**0**	**100.0**	**100.0**	**0**	**100.0**	**100.0**	**100.0**
2023	**0**	**100.0**	**100.0**	**0**	**100.0**	**100.0**	**100.0**
Source: 2023-2024 FFIEC; 2023-2024 D&B; 2020 U.S. Census: ACS							

Borrower Profile

The distribution of borrowers reflected, given the demographics of the assessment area, poor penetration among individuals of different income levels (including LMI) and businesses of different sizes. Poor performance in home mortgage lending and poor performance for small businesses supported this conclusion.

Home Mortgage Loans

During the evaluation period, the bank did not originate any home mortgage loans to low-income borrowers in this assessment area and originated only one home mortgage loan to a moderate-income borrower in 2023, which reflected poor penetration.

Borrower Distribution of Home Mortgage Loans							
Borrower Income Level	**Bank And Aggregate Loans**						**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
Low							
2024	0	0	6.7	0	0	2.4	25.0
2023	0	0	7.0	0	0	2.2	25.1
Moderate							
2024	0	0	17.2	0	0	8.6	15.2
2023	1	33.3	17.8	405	3.9	8.0	15.1
Middle							
2024	0	0	18.8	0	0	12.2	17.7
2023	0	0	17.3	0	0	10.2	17.7
Upper							
2024	2	100.0	43.6	5,500	100.0	61.6	42.1
2023	2	66.7	39.0	9,937	96.1	48.8	42.0
Unknown							
2024	0	0	13.7	0	0	15.2	0
2023	0	0	18.9	0	0	30.9	0
Totals							
2024	**2**	**100.0**	**100.0**	**5,500**	**100.0**	**100.0**	**100.0**
2023	**3**	**100.0**	**100.0**	**10,342**	**100.0**	**100.0**	**100.0**
Source: 2023-2024 FFIEC; 2020 U.S. Census; Multifamily loans are not included in the borrower distribution analysis							

Small Business Loans

During the evaluation period, the bank did not make any loans to businesses with GAR of $1.0 million or less, which reflected poor penetration throughout the assessment area. Notably, aggregate data indicated that lenders in the assessment area were serving small businesses, particularly those with GAR of $1.0 million or less, indicating that there was a demand for loans.

Borrower Distribution of Small Business Loans							
Borrower Income Level	**Bank And Aggregate Loans**						**Total Businesses %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
$1.0 Million or Less							
2024	0	0	54.1	0	0	34.7	91.3
2023	0	0	55.3	0	0	34.9	91.4
Over $1.0 Million							
2024	0	0		0	0		7.5
2023	0	0		0	0		7.5
Revenue Unknown							
2024	0	0		0	0		1.2
2023	0	0		0	0		1.1
Totals							
2024	**0**	**100.0**		**0**	**100.0**		**100.0**
2023	**0**	**100.0**		**0**	**100.0**		**100.0**
Source: 2023-2024 FFIEC Census; 2023-2024 D&B; 2020 U.S. Census: ACS							

COMMUNITY DEVELOPMENT TEST

FPBT's performance under the Community Development Test was Satisfactory.

Community Development Loans

During the evaluation period, FPBT made one community development loan for approximately $666,000. Specifically, the bank modified a loan to a nonprofit organization located in a moderate-income census tract serving LMI individuals and families. The modification improved the organization's cash flow and enabled it to continue to provide essential services to LMI families in Bridgeport, including access to affordable housing, employment opportunities, and healthcare services. This performance is appropriate for the bank's capacity and business strategy in this assessment area.

Community Development Investments and Grants

During the evaluation period, FPBT did not make any community development investments in this assessment area. However, the bank reported 4 grants totaling approximately $12,000. Community development grants, by number and dollar amount, were primarily to organizations that provided community services to LMI individuals. This reflected the bank's responsiveness to a community development need identified by the community contact. This performance is appropriate for the bank's capacity and business strategy in this assessment area.

The table below illustrates the bank's community development grant activity by purpose.

Community Development Grants										
Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000's)	#	$(000's)	#	$(000's)	#	$(000's)	#	$(000's)
2024	0	0	3	10	1	2	0	0	4	12
Grand Total	**0**	**0**	**3**	**10**	**1**	**2**	**0**	**0**	**4**	**12**
Source: Bank data January 1, 2024 to December 31, 2024										

Below are examples of the bank's community development grants within the assessment area.

- In 2024, the bank donated $5,000 to a community service organization located in Fairfield County. The funds were used to support low-income families by providing food assistance, housing, affordable legal counseling, and other programs designed to help families move out of poverty.

- In 2024, the bank made a $3,000 grant to a nonprofit organization that serves LMI individuals and families in Fairfield County. The funds were used to support financial literacy and career readiness programs for LMI students.

Community Development Services

During the evaluation period, FPBT provided 6 community development services totaling approximately 64 hours, addressing community service needs in this assessment area. This reflected the bank's responsiveness to a need identified by the community contact. This performance is appropriate for the bank's capacity and business strategy in this assessment area.

The table below illustrates the bank's community development services by purpose.

Community Development Services					
Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2024	0	6	0	0	**6**
Total	**0**	**6**	**0**	**0**	**6**
Source: Bank data January 1, 2024 to December 31, 2024					

Below are examples of the bank's community development services within the assessment area.

- In 2024, a bank director served as a board member of a nonprofit organization in Fairfield County. The organization provided financial literacy education, housing, and budget counseling programs to LMI individuals and households.

- In 2024, three bank employees facilitated financial literacy seminars to LMI students and senior citizens. The seminars focused on personal banking concepts and prevention of financial exploitation and fraud. The employees supported the financial education needs of LMI individuals.

NEW YORK STATE

CRA RATING FOR NEW YORK STATE: Needs to Improve

The Lending Test is rated: Needs to Improve
The Community Development Test is rated: Needs to Improve

SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS

The major factors supporting the bank's rating include:

LENDING TEST

- The geographic distribution of loans reflected poor penetration through the assessment area.

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

COMMUNITY DEVELOPMENT TEST

- The bank's community development performance demonstrated poor responsiveness to community development loans, qualified investments, and community development services, as appropriate considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS

The bank's NY operations were entirely within MD 35614 (New York-Jersey City-White Plains, NY-NJ). Please refer to the Description of Institution's Operations under MD 35614 (New York-Jersey City-White Plains, NY-NJ) Full Scope Review.

SCOPE OF EVALUATION

The evaluation of FPBT's activities in NY consisted of a full scope review of the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. This assessment area was evaluated under full scope procedures as it is the only assessment area in NY.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding the bank's performance in NY were solely based on the performance in the MD 35614 (New York-Jersey City-White Plains, NY-NJ) assessment area. Specific comments regarding the lending and community development tests were discussed under the MD 35614 (New York-Jersey City-White Plains, NY-NJ) Full Scope Review.

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

DESCRIPTION OF INSTITUTION'S OPERATIONS

FPBT operated 1 (33.3%) of its 3 branches in this assessment area during the evaluation period.

According to the June 30, 2024 FDIC Summary of Deposit Report, 84 institutions operated 529 offices within this assessment area. FPBT ranked 79th with approximately $28.3 million in deposits, which represented less than 0.1% of the deposit market share and accounted for 3.1% of the bank's total branch deposits. However, these figures reflect a significant decline in market share since the prior evaluation. Historically FPBT maintained a significant percentage of the bank's total branch deposits in this assessment area. For example, as of June 2023, the bank's total deposit represented 49.2% of the bank's total branch deposits. Notably, the bank generated approximately 14.3% by number and 14.1% by dollar volume of the bank's combined total lending activity from January 1, 2023 to December 31, 2024. Competitors included large financial institutions, such as JP Morgan Chase, N.A., Goldman Sachs Bank USA, BNY, HSBC Bank USA, N.A., and Bank of America, N.A., which captured 80.9% of deposit market share.

SCOPE OF EVALUATION

Procedures

Examiners used full scope review examination procedures to evaluate the bank's performance in this assessment area.

PERFORMANCE CONTEXT

Demographic Characteristics

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

Income Characteristics

Based on the 2020 U.S. Census, the assessment area had 325,483 families, of which 24.3% were low-income (12.0% of which were below the poverty level), 11.0% were moderate-income, 11.0% were middle-income, and 53.6% were upper-income.

The table below depicts the MFI's for the assessment area.

Median Family Income			
Area	**2015 MFI**	**2020 MFI**	**% Change**
Assessment Area	$97,557	$114,659	17.5
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	$73,814	$85,483	15.8
State of NY	$78,570	$87,270	11.1
Source: 2015 ACS and 2020 U.S. Census; MFIs have been inflation-adjusted and expressed in 2020 dollars.			

Housing Characteristics

Based on the 2020 U.S. Census, the assessment area had 884,828 housing units, of which 20.6% were owner-occupied, 65.1% were rental, and 14.3% were vacant. Of the total housing units, 11.3% were located in low-income census tracts, 14.0% in moderate-income census tracts, 9.4% in middle-income census tracts, 62.8% in upper-income census tracts, and 2.5% in unknown-income census tracts. In low-income census tracts, 4.9% of housing units were owner-occupied, 87.4% were rental units, and 7.7% were vacant. In moderate-income census tracts, 9.2% of housing units were owner-occupied, 83.4% were rental units, and 7.4% were vacant.

The median age of housing stock in this assessment area was 61 years old, with 49.5% of the stock built before 1950. The median age of housing stock was 61 years in low-income census tracts and 61 years in moderate-income census tracts. According to the 2020 U.S. Census, the median housing value in this assessment area was $1.0 million with an affordability ratio of 8.7. The median gross rent in the assessment area was $1,786 per month.

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

Housing Cost Burden

Housing costs were relatively expensive in this assessment area, which indicated that affordable housing for LMI individuals and families continued to be a challenge. According to HUD, within the assessment area, 41.8% of all rental households had rental costs that exceeded 30.0% of their incomes, 72.0% of low-income rental households had rental costs that exceeded 30.0% of their income, and 51.5% of moderate-income rental households had rental costs that exceeded 30.0% of their income.

According to HUD, within this assessment area, 21.9% of homeowners had housing costs that exceeded 30.0% of their income, 62.5% of low-income homeowners had housing costs that exceeded 30.0% of their income, and 47.0% of moderate-income homeowners had housing costs that exceeded 30.0% of their income. See the table below for more details.

Housing Cost Burden*						
Area	**Cost Burden-Renters**			**Cost Burden-Owners**		
	Low Income	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Assessment Area	72.0%	51.5%	41.8%	62.5%	47.0%	21.9%
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	76.9%	46.1%	47.2%	76.1%	52.2%	32.0%
State of NY	76.4%	42.8%	46.8%	70.8%	40.8%	25.5%
**Housing Cost Burden is housing cost that equals 30.0% or more of household income. Source: HUD 2017-2021 Comprehensive Housing Affordability Strategy*						

Labor, Employment and Economic Characteristics

According to D&B, there were 143,897 businesses operating in this assessment area in 2024, of which 4.1% were located in low-income census tracts and 5.9% were located in moderate-income census tracts. Of the total businesses operating in the assessment area, 85.7% were small businesses with GAR of $1.0 million or less, of which 4.4% were located in low-income census tracts and 6.5% were located in moderate-income census tracts.

According to the BLS, during the evaluation period, unemployment in the assessment area was slightly higher than the state of NY.

Unemployment Rates		
Area	**2023**	**2024**
Assessment Area	4.5%	4.8%
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	4.6%	4.8%
State of NY	4.1%	4.3%
Source: BLS, Local Area Unemployment Statistics		

Additional performance context for this assessment area is provided in the following table.

Assessment Area Demographics									
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low	36	11.6	48,143	14.8	16,018	33.3	79,178	24.3	
Moderate	44	14.2	56,991	17.5	11,342	19.9	35,935	11.0	
Middle	32	10.3	32,267	9.9	3,997	12.4	35,775	11.0	
Upper	175	56.5	181,528	55.8	6,880	3.8	174,595	53.6	
Unknown	23	7.4	6,554	2.0	762	11.6	0	0	
Total Assessment Area	**310**	**100.0**	**325,483**	**100.0**	**38,999**	**12.0**	**325,483**	**100.0**	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied			Rental		Vacant		
		#	%	%	#	%	#	%	
Low	100,138	4,860	2.7	4.9	87,538	87.4	7,740	7.7	
Moderate	123,528	11,414	6.3	9.2	103,030	83.4	9,084	7.4	
Middle	82,844	13,458	7.4	16.2	61,304	74.0	8,082	9.8	
Upper	555,246	150,057	82.2	27.0	307,218	55.3	97,971	17.6	
Unknown	23,072	2,718	1.5	11.8	17,123	74.2	3,231	14.0	
Total Assessment Area	**884,828**	**182,507**	**100.0**	**20.6**	**576,213**	**65.1**	**126,108**	**14.3**	
	Total Businesses by Tract		Businesses by Tract & Revenue Size						
			Less Than or = $1.0 Million		Over $1.0 Million		Revenue Not Reported		
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**	
Low	5,869	4.1	5,483	4.4	356	1.9	30	2.3	
Moderate	8,518	5.9	8,025	6.5	452	2.4	41	3.2	
Middle	6,208	4.3	5,904	4.8	278	1.4	26	2.0	
Upper	107,873	75.0	91,857	74.4	14,997	78.0	1,019	79.5	
Unknown	15,429	10.7	12,120	9.8	3,144	16.4	165	12.9	
Total Assessment Area	**143,897**	**100.0**	**123,389**	**100.0**	**19,227**	**100.0**	**1,281**	**100.0**	
	% of Total Businesses:			**85.7**		**13.4**		**0.9**	
	Total Farms by Tract		Farms by Tract & Revenue Size						
			Less Than or = $1.0 Million		Over $1.0 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	18	6.2	18	6.5	0	0	0	0	
Moderate	18	6.2	18	6.5	0	0	0	0	
Middle	18	6.2	18	6.5	0	0	0	0	
Upper	217	75.1	209	74.9	8	80.0	0	0	
Unknown	18	6.2	16	5.7	2	20.0	0	0	
Total Assessment Area	**289**	**100.0**	**279**	**100.0**	**10**	**100.0**	**0**	**0**	
	% of Total Farms:			**96.5**		**3.5**		**0**	
Source: 2024 FFIEC and 2024 D&B									

Community Contact

Examiners conducted a community contact interview with a representative from an affordable housing organization that offers various programs to homeless individuals and families. The representative indicated that the increase in number of long-term homeless individuals was largely due to the shortage of affordable housing for low-income individuals and families. The contact emphasized that affordable housing was not attainable for most LMI individuals in the assessment area. The representative also noted that there continues to be a need for affordable housing programs and access to credit products serving LMI families.

Considering information from the community contact, as well as regional demographic and economic data, examiners determined that affordable housing and access to credit represented the primary community development needs in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

FPBT's performance under the Lending Test was rated Needs to Improve. This conclusion was principally based on poor geographic distribution of loans and poor penetration among individuals of different income levels and businesses of different sizes.

Geographic Distribution of Loans

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

Gap Analysis

During the evaluation period, the bank did not originate any home mortgage loans in LMI census tracts. In addition, the bank did not originate any small business loans in low-income census tracts. In 2024, FPBT originated one small business loan in a moderate-income census tract. As a result, lending penetration in LMI census tracts reflected poor performance.

The bank's lending gap analysis in the assessment area is summarized in the table below.

Lending Gap Analysis			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration %**
2024			
Low	36	36	0.0
Moderate	44	43	2.3
Middle	32	32	0.0
Upper	175	171	2.3
Unknown	23	23	0.0
2023			
Low	36	36	0.0
Moderate	44	44	0.0
Middle	32	32	0.0
Upper	175	172	1.7
Unknown	23	22	4.3
Source: FFIEC and Bank data January 1, 2023 to December 31, 2024			

Home Mortgage Loans

The geographic distribution of home mortgage loans reflected poor penetration throughout the assessment area as the bank did not originate any loans in LMI census tracts during the evaluation period.

Geographic Distribution of Home Mortgage Loans							
Geographic Income Level	**Bank And Aggregate Loans**						**Owner-Occupied Units %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
Low							
2024	0	0	3.2	0	0	5.8	2.7
2023	0	0	4.0	0	0	3.2	2.7
Moderate							
2024	0	0	5.9	0	0	6.1	6.3
2023	0	0	6.7	0	0	4.9	6.3
Middle							
2024	0	0	6.6	0	0	3.6	7.4
2023	0	0	8.1	0	0	4.7	7.4
Upper							
2024	2	100.0	82.0	4,755	100.0	81.6	82.2
2023	3	75.0	79.4	7,308	85.9	85.7	82.2
Unknown							
2024	0	0	2.3	0	0	2.7	1.5
2023	1	25.0	1.9	1,200	14.1	1.5	1.5
Totals							
2024	**2**	**100.0**	**100.0**	**4,755**	**100.0**	**100.0**	**100.0**
2023	**4**	**100.0**	**100.0**	**8,508**	**100.0**	**100.0**	**100.0**
Source: 2023-2024 FFIEC; 2020 U.S. Census							

Small Business Loans

During the evaluation period, the bank did not originate any small business loans in low-income census tracts and originated only one small business loan in a moderate-income census tract, which reflected poor penetration throughout the assessment area.

Geographic Distribution of Small Business Loans							
Geographic Income Level	**Bank And Aggregate Loans**						**Total Businesses %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
Low							
2024	0	0	4.3	0	0	2.7	4.1
2023	0	0	4.4	0	0	2.7	4.0
Moderate							
2024	1	50.0	6.4	100	16.7	4.4	5.9
2023	0	0	6.7	0	0	4.0	5.7
Middle							
2024	0	0	5.3	0	0	3.3	4.3
2023	0	0	5.2	0	0	3.2	4.5
Upper							
2024	1	50.0	74.8	500	83.3	77.9	75.0
2023	0	0	74.4	0	-	78.2	75.2
Unknown							
2024	0	0	9.0	0	0	11.8	10.7
2023	0	0	9.1	0	-	11.9	10.6
Totals							
2024	**2**	**100.0**	**100.0**	**600**	**100.0**	**100.0**	**100.0**
2023	**0**	**100.0**	**100.0**	**0**	**100.0**	**100.0**	**100.0**
Source: 2023-2024 FFIEC; 2023-2024 D&B; 2020 U.S. Census: ACS							

Borrower Profile

The distribution of borrowers reflected, given the demographics of the assessment area, poor penetration among individuals of different income levels (including LMI) and businesses of different sizes. Home mortgage lending to LMI individuals was poor and lending to small businesses was very poor.

Home Mortgage Loans

The borrower distribution of home mortgage loans reflected poor penetration throughout the assessment area, as the bank did not originate any home mortgage loans to LMI borrowers during the evaluation period.

Borrower Distribution of Home Mortgage Loans							
Borrower Income Level	**Bank And Aggregate Loans**						**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
Low							
2024	0	0	0.5	0	0	0.2	24.3
2023	0	0	0.2	0	0	0.1	24.3
Moderate							
2024	0	0	1.8	0	0	0.4	11.0
2023	0	0	1.0	0	0	0.2	11.0
Middle							
2024	0	0	5.7	0	0	1.5	11.0
2023	0	0	2.9	0	0	0.7	11.0
Upper							
2024	2	100.0	81.6	4755	100.0	79.4	53.6
2023	2	66.7	39.0	2842	70.3	34.2	53.6
Unknown							
2024	0	0	10.3	0	0	18.5	0
2023	1	33.3	56.9	1200	29.7	64.8	0
Totals							
2024	**2**	**100.0**	**100.0**	**4,755**	**100.0**	**100.0**	**100.0**
2023	**3**	**100.0**	**100.0**	**4,042**	**100.0**	**100.0**	**100.0**
Source: 2023-2024 FFIEC; 2020 U.S. Census; Multifamily loans are not included in the borrower distribution analysis							

<u>Small Business Loans</u>

The borrower distribution of small business loans reflected very poor penetration throughout the assessment area, as the bank did not extend any loans to businesses with GAR of $1.0 million or less during the evaluation period. Notably, aggregate data indicated that lenders in the assessment area were serving small businesses, particularly those with GAR of $1.0 million or less, indicating that there was a demand for loans.

Borrower Distribution of Small Business Loans							
Borrower Income Level	**Bank And Aggregate Loans**						**Total Businesses %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
$1.0 Million or Less							
2024	0	0	43.9	0	0	25.3	85.7
2023	0	0	43.8	0	0	25.6	85.6
Over $1.0 Million							
2024	2	100.0		600	100.0		13.4
2023	0	0		0	0		13.5
Revenue Unknown							
2024	0	0		0	0		0.9
2023	0	0		0	0		0.9
Totals							
2024	**2**	**100.0**		**600**	**100.0**		**100.0**
2023	**0**	**100.0**		**0**	**100.0**		**100.0**
Source: 2023-2024 FFIEC Census; 2023-2024 D&B; 2020 U.S. Census: ACS							

COMMUNITY DEVELOPMENT TEST

FPBT's performance under the Community Development Test was rated Needs to Improve. The level of community development activity was limited relative to the bank's established presence in this assessment area.

Community Development Loans

FPBT did not originate any qualified community development loans in this assessment area.

Community Development Investments and Grants

During the evaluation period, FPBT did not make any new community development investments. However, the bank reported 2 grants totaling $4,000 and 1 prior period investment with an outstanding balance of $981,000.

The table below illustrates the bank's community development investment and grant activity by purpose.

Community Development Investments and Grants										
Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000's)**	**#**	**$(000's)**	**#**	**$(000's)**	**#**	**$(000's)**	**#**	**$(000's)**
Total Prior Investments	**1**	**981**	**0**	**0**	**0**	**0**	**0**	**0**	**1**	**981**
Total Grants	**0**	**0**	**2**	**4**	**0**	**0**	**0**	**0**	**2**	**4**
Grand Total	**1**	**981**	**2**	**4**	**0**	**0**	**0**	**0**	**3**	**985**
Source: Bank data January 1, 2024 to December 31, 2024										

Below depicts the bank's community development investments and grants within the assessment area.

- FPBT's prior period investment was in a housing development capital fund that financed affordable housing developments and preservation activities benefiting LMI individuals and families in this assessment area.

- In 2024, the bank extended a $3,000 grant to a NYC school located in a low-income census tract in the assessment area. The grant was used to fund special education classes, workforce development programs, and mental health support for LMI students.

Community Development Services

During the evaluation period, FPBT provided 28 community development services totaling 222 hours that benefited this assessment area. All services supported community development by providing community services to LMI individuals and communities.

Below are examples of the bank's community development services within the assessment area:

- In 2024, two bank employees conducted financial literacy seminars focusing on the prevention of financial exploitation and fraud to senior citizens located in a low-income census tract.

- In 2024, a bank director provided legal expertise and assistance to a nonprofit legal counseling organization that assisted LMI individuals and families facing foreclosure and other financial litigation matters.

GEORGIA STATE

CRA RATING FOR GEORGIA STATE: Needs to Improve

The Lending Test is rated: Needs to Improve
The Community Development Test is rated: Satisfactory

SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS

The major factors supporting the bank's rating include:

LENDING TEST

- The geographic distribution of loans reflected very poor penetration through the assessment area.

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

COMMUNITY DEVELOPMENT TEST

- The bank's community development performance demonstrated adequate responsiveness to community development loans, qualified investments, and community development services, as appropriate considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS

The bank's GA operations were entirely within MD 12054 (Atlanta-Sandy Springs-Roswell, GA). Please refer to the Description of Institution's Operations under MD 12054 (Atlanta-Sandy Springs-Roswell, GA) Full Scope Review.

SCOPE OF EVALUATION

The evaluation of FPBT's activities in GA consisted of a full scope review of the MD 12054 (Atlanta-Sandy Springs-Roswell, GA) assessment area. This assessment area was evaluated under full scope procedures as it is the only assessment area in GA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding the bank's performance in GA were solely based on the performance in the MD 12054 (Atlanta-Sandy Springs-Roswell, GA) assessment area. Specific comments regarding the lending and community development tests were discussed under the MD 12054 (Atlanta-Sandy Springs-Roswell, GA) Full Scope Review.

MD 12054 (ATLANTA-SANDY SPRINGS-ROSWELL, GA) FULL SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS

FPBT operated 1 (33.3%) of its 3 branches in this assessment area during the evaluation period.

According to the June 30, 2024 FDIC Summary of Deposit Report, 48 institutions operated 244 offices within this assessment area. FPBT ranked 40th with approximately $43.0 million in deposits, which represented less than 0.1% of the deposit market share and accounted for 4.7% of the bank's total branch deposits. This assessment area generated approximately 8.9% by number and 5.5% by dollar volume of the bank's combined total lending activity from January 1, 2023 to December 31, 2024. Competitors included large financial institutions, such as Truist Bank, Bank of America N.A., Wells Fargo Bank N.A., RBC Bank N.A., and JPMorgan Chase N.A., which captured 81.6% of the deposit market share.

SCOPE OF EVALUATION

Procedures

Examiners used full scope review examination procedures to evaluate the bank's performance in this assessment area.

PERFORMANCE CONTEXT

Demographic Characteristics

The assessment area included the entire Fulton County. According to the 2020 U.S. Census, the population of this assessment area was 1,066,710. The assessment area consisted of 327 census tracts, of which 38 or 11.6% were low-income, 52 or 15.9% were moderate-income, 45 or 13.8% were middle-income, 158 or 48.3% were upper-income, and 34 or 10.4% were of unknown-income.

Income Characteristics

Based on the 2020 U.S. Census, the assessment area had 229,604 families, of which 21.2% were low-income (9.6% of which were below the poverty level), 12.9% were moderate-income, 15.4% were middle-income, and 50.5% were upper-income.

The table below depicts the MFI's for the assessment area.

Median Family Income			
Area	**2015 MFI**	**2020 MFI**	**% Change**
Assessment Area	$84,631	$99,490	17.6
MD 12054 (Atlanta-Sandy Springs-Roswell, GA)	$71,014	$81,951	15.4
State of GA	$64,910	$74,127	14.2
Source: 2015 ACS and 2020 U.S. Census; MFIs have been inflation-adjusted and expressed in 2020 dollars.			

Housing Characteristics

Based on the 2020 U.S. Census, the assessment area had 479,696 housing units, of which 47.1% were owner-occupied, 42.0% were rental, and 10.9% were vacant. Of the total housing units, 11.2% were located in low-income census tracts, 16.4% in moderate-income census tracts, 15.0% in middle-income census tracts, 49.4% in upper-income census tracts, and 8.0% in unknown-income census tracts. In low-income census tracts, 21.3% of housing units were owner-occupied, 59.9% were rental units, and 18.8% were vacant. In moderate-income census tracts, 37.0% of housing units were owner-occupied, 47.8% were rental units, and 15.2% were vacant.

The median age of housing stock in this assessment area was 38 years old, with 9.7% of the stock built before 1950. The median age of housing stock was 53 years in low-income census tracts and 49 years in moderate-income census tracts. According to the 2020 U.S. Census, the median housing value in this assessment area was $326,708 with an affordability ratio of 22.2. The median gross rent in the assessment area was $1,264 per month.

Housing Characteristics			
Geographic Area	**2020 Median Housing Value**	**2020 Affordability Ratio**	**2020 Median Gross Rent**
Assessment Area	$326,708	22.2	$1,264
MD 12054 (Atlanta-Sandy Springs-Roswell, GA)	$228,890	30.0	$1,199
State of GA	$190,200	32.2	$1,042
Source: 2020 U.S. Census			

Housing Cost Burden

Housing costs were relatively expensive in this assessment area, which indicated that affordable housing for LMI individuals and families continued to be a challenge. According to HUD, within the assessment area, 44.7% of all rental households had rental costs that exceeded 30.0% of their incomes, 76.2% of low-income rental households had rental costs that exceeded 30.0% of their income, and 61.4% of moderate-income rental households had rental costs that exceeded 30.0% of their income.

According to HUD, within this assessment area, 20.1% of homeowners had housing costs that exceeded 30.0% of their incomes, 65.2% of low-income homeowners had housing costs that exceeded 30.0% of their income, and 44.6% of moderate-income homeowners had housing costs that exceeded 30.0% of their income. See the table below for more details.

Housing Cost Burden*						
Area	**Cost Burden-Renters**			**Cost Burden-Owners**		
	Low Income	**Moderate Income**	**All Renters**	**Low Income**	**Moderate Income**	**All Owners**
Assessment Area	76.2%	61.4%	44.7%	65.2%	44.6%	20.1%
MD 12054 (Atlanta-Sandy Springs-Roswell, GA)	80.0%	54.6%	46.6%	63.6%	36.4%	19.9%
State of GA	77.2%	51.2%	44.0%	60.2%	33.6%	18.7%
**Housing Cost Burden is housing cost that equals 30.0% or more of household income.* *Source: HUD 2017-2021 Comprehensive Housing Affordability Strategy*						

Labor, Employment and Economic Characteristics

According to D&B, there were 74,690 businesses operating in this assessment area in 2024, of which 6.4%

were located in low-income census tracts and 14.0% were located in moderate-income census tracts. Of the total businesses operating in the assessment area, 91.9% were small businesses with GAR of $1.0 million or less, of which 6.6% were located in low-income census tracts and 14.1% were located in moderate-income census tracts.

According to the BLS, unemployment rates in the assessment area were consistent with the state of GA, with minimal fluctuation during the evaluation period.

Unemployment Rates		
Area	**2023**	**2024**
Assessment Area	3.4%	3.6%
MD 12054 (Atlanta-Sandy Springs-Roswell, GA)	3.3%	3.5%
State of GA	3.3%	3.5%
Source: BLS, Local Area Unemployment Statistics		

Additional performance context for this assessment area is provided in the following table.

Assessment Area Demographics									
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	38	11.6	21,976	9.6	7,138	32.5	48,696	21.2
Moderate	52	15.9	35,234	15.3	5,987	17.0	29,602	12.9
Middle	45	13.8	36,155	15.7	2,447	6.8	35,262	15.4
Upper	158	48.3	126,097	54.9	4,122	3.3	116,044	50.5
Unknown	34	10.4	10,142	4.4	2,303	22.7	0	0
Total Assessment Area	**327**	**100.0**	**229,604**	**100.0**	**21,997**	**9.6**	**229,604**	**100.0**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low	53,538	11,384	5.0	21.3	32,043	59.9	10,111	18.9
Moderate	78,452	29,025	12.8	37.0	37,524	47.8	11,903	15.2
Middle	71,945	34,741	15.4	48.3	31,138	43.3	6,066	8.4
Upper	237,303	139,579	61.8	58.8	78,277	33.0	19,447	8.2
Unknown	38,458	11,174	4.9	29.1	22,494	58.5	4,790	12.5
Total Assessment Area	**479,696**	**225,903**	**100.0**	**47.1**	**201,476**	**42.0**	**52,317**	**10.9**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1.0 Million		**Over $1.0 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	4,811	6.4	4,558	6.6	210	4.1	43	5.0
Moderate	10,424	14.0	9,714	14.1	608	11.7	102	11.9
Middle	9,457	12.7	8,920	13.0	441	8.5	96	11.2
Upper	44,120	59.1	40,106	58.4	3,473	67.0	541	63.3
Unknown	5,878	7.9	5,357	7.8	448	8.6	73	8.5
Total Assessment Area	**74,690**	**100.0**	**68,655**	**100.0**	**5,180**	**100.0**	**855**	**100.0**
	% of Total Businesses:			**91.9**		**6.9**		**1.1**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1.0 Million		**Over $1.0 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	13	4.8	13	4.9	0	0	0	0
Moderate	34	12.5	31	11.7	3	50.0	0	0
Middle	35	12.9	35	13.2	0	0	0	0
Upper	171	63.1	169	63.8	2	33.3	0	0
Unknown	18	6.6	17	6.4	1	16.7	0	0
Total Assessment Area	**271**	**100.0**	**265**	**100.0**	**6**	**100.0**	**0**	**0**
	% of Total Farms:			**97.8**		**2.2**		**0**

Source: 2024 FFIEC and 2024 D&B

Community Contact

Examiners conducted a community contact interview with a representative from a nonprofit organization that develops, finances, and advocates for affordable housing in the assessment area. The contact noted that the lack of access to capital constrained developers' ability to secure financing for projects, which contributed to foreclosures. In addition, rising rents and housing prices, coupled with stagnant wages, further exacerbated the shortage of affordable housing. The contact noted that financial institutions may have opportunities to provide innovative solutions to offset some of these challenges.

Considering information from the community contact, as well as regional demographic and economic data, examiners determined that affordable housing represented the primary community development need in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

FPBT's performance under the Lending Test was rated Needs to Improve. This conclusion was primarily based on very poor geographic distribution of loans and poor penetration among individuals of different income levels and businesses of different sizes.

Geographic Distribution of Loans

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

<u>Gap Analysis</u>

During the evaluation period, FPBT did not originate any home mortgage or small business loans in LMI census tracts within this assessment area. As a result, lending penetration in LMI census tracts reflected poor performance.

The lending gap analysis in the assessment area is summarized in the table below.

Lending Gap Analysis			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration %**
2024			
Low	38	38	0
Moderate	52	52	0
Middle	45	45	0
Upper	158	156	1.3
Unknown	34	34	0
2023			
Low	44	44	0
Moderate	51	51	0
Middle	42	42	0
Upper	156	153	1.9
Unknown	34	34	0
Source: FFIEC and Bank data January 1, 2023 to December 31, 2024			

Home Mortgage Loans

The geographic distribution of home mortgage loans reflected very poor penetration throughout the assessment area. During the review period, the bank did not originate any home mortgage loans in LMI census tracts within this assessment area. The aggregate lending and demographic data indicated that lending opportunities existed in this assessment area.

Geographic Distribution of Home Mortgage Loans							
Geographic Income Level	**Bank And Aggregate Loans**						**Owner-Occupied Units %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
Low							
2024	0	0	8.2	0	0	3.5	5.0
2023	0	0	10.0	0	0	10.2	5.8
Moderate							
2024	0	0	16.5	0	0	7.3	12.8
2023	0	0	18.4	0	0	13.0	14.1
Middle							
2024	0	0	18.1	0	0	9.0	15.4
2023	0	0	14.0	0	0	9.1	13.7
Upper							
2024	1	100.0	50.6	300	100.0	75.9	61.8
2023	1	100.0	50.9	3,645	100.0	62.8	61.4
Unknown							
2024	0	0	6.6	0	0	4.3	4.9
2023	0	0	6.8	0	0	4.9	4.9
Totals							
2024	**1**	**100.0**	**100.0**	**300**	**100.0**	**100.0**	**100.0**
2023	**1**	**100.0**	**100.0**	**3,645**	**100.0**	**100.0**	**100.0**
Source: 2023-2024 FFIEC; 2020 U.S. Census							

Small Business Loans

The geographic distribution of small business loans reflected poor penetration throughout the assessment area as the bank did not originate any small business loans in LMI census tracts during the evaluation period.

Geographic Distribution of Small Business Loans							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000's)	$%	$%	
Low							
2024	0	0	4.1	0	0	3.3	6.4
2023	0	0	5.3	0	0	4.1	6.6
Moderate							
2024	0	0	12.2	0	0	12.0	14.0
2023	0	0	12.1	0	0	11.7	13.4
Middle							
2024	0	0	11.8	0	0	9.8	12.7
2023	0	0	11.9	0	0	9.0	11.5
Upper							
2024	1	100.0	65.1	200	100.0	67.5	59.1
2023	2	100.0	63.3	1,250	100.0	67.6	59.7
Unknown							
2024	0	0	6.7	0	0	7.4	7.9
2023	0	0	7.3	0	0	7.5	8.7
Totals							
2024	**1**	**100.0**	**100.0**	**200**	**100.0**	**100.0**	**100.0**
2023	**2**	**100.0**	**100.0**	**1,250**	**100.0**	**100.0**	**100.0**
Source: 2023-2024 FFIEC; 2023-2024 D&B; 2020 U.S. Census: ACS							

Borrower Profile

The distribution of borrowers reflected, given the demographics of the assessment area, poor penetration among individuals of different income levels (including LMI) and businesses of different sizes. Home mortgage lending to LMI borrowers was very poor and lending to businesses with GAR of $1.0 million or less was reasonable.

Home Mortgage Loans

The borrower distribution of home mortgage loans reflected very poor penetration throughout the assessment area as the bank did not make any home mortgage loans to LMI borrowers during the evaluation period. The aggregate lending and demographic data indicated that lending opportunities existed in this assessment area.

Borrower Distribution of Home Mortgage Loans							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000's)	$%	$%	
Low							
2024	0	0	3.3	0	0	0.9	21.2
2023	0	0	3.8	0	0	1.0	22.0
Moderate							
2024	0	0	11.3	0	0	3.6	12.9
2023	0	0	13.4	0	0	5.2	13.3
Middle							
2024	0	0	15.7	0	0	6.4	15.4
2023	0	0	16.7	0	0	8.3	15.5
Upper							
2024	1	100.0	45.4	300	100.0	35.3	50.5
2023	0	0	45.8	0	0	40.4	49.2
Unknown							
2024	0	0	24.3	0	0	53.9	0
2023	0	0	20.3	0	0	45.1	0
Totals							
2024	**1**	**100.0**	**100.0**	**300**	**100.0**	**100.0**	**100.0**
2023	**0**	**100.0**	**100.0**	**0**	**100.0**	**100.0**	**100.0**
Source: 2023-2024 FFIEC; 2020 U.S. Census; Multifamily loans are not included in the borrower distribution analysis							

Small Business Loans

The borrower distribution of small business loans reflected reasonable penetration throughout the assessment area.

During the evaluation period, the bank originated three loans to businesses with GAR of $1.0 million or less. In 2024, the bank originated one loan and in 2023, the bank originated two loans. In 2024 and 2023, the bank's lending performance was above the percentage of businesses with GAR of $1.0 million or less, and significantly above aggregate performance. Despite the bank's limited lending activity in this assessment area, and compared to the demographic and aggregate data, the performance is reasonable.

Borrower Distribution of Small Business Loans							
Borrower Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000's)	$%	$%	
$1.0 Million or Less							
2024	1	100.0	45.5	200	100.0	30.5	91.9
2023	2	100.0	48.6	1,250	100.0	32.9	92.0
Over $1.0 Million							
2024	0	0		0	0		6.9
2023	0	0		0	0		6.9
Revenue Unknown							
2024	0	0		0	0		1.1
2023	0	0		0	0		1.1
Totals							
2024	**1**	**100.0**		**200**	**100.0**		**100.0**
2023	**2**	**100.0**		**1,250**	**100.0**		**100.0**
Source: 2023-2024 FFIEC Census; 2023-2024 D&B; 2020 U.S. Census: ACS							

COMMUNITY DEVELOPMENT TEST

FPBT's performance under the Community Development Test was rated Satisfactory.

Community Development Loans

The bank made one community development loan in this assessment area. In 2024, FPBT extended a $4.1 million loan to a community development organization located in Fulton County. The loan helped finance the construction of 31 affordable housing single-family townhomes in a HUD designated Renewal Community and an Empowerment Zone for LMI families. The performance was appropriate for the bank's capacity and business strategy and reflected the bank's reflected responsiveness to a community development need identified by the community contact.

Community Development Investments and Grants

During the evaluation period, FPBT did not make any community development investments in this assessment area. However, in 2024, FPBT provided a $15,000 grant to a nonprofit organization located in this assessment area. The grant helped fund a financial literacy conference for small businesses and startups accessing business development resources. promoting economic development by supporting small business growth and entrepreneurship. This performance is appropriate for the bank's capacity and business strategy in this assessment area.

Community Development Services

During the evaluation period, FPBT provided 12 community development services totaling 88 hours to support community service initiatives.

The following represent FPBT's community development services within the assessment area.

- In 2024, eight bank employees hosted financial literacy training sessions for LMI students focused on budgeting, savings, and responsible use of credit.

- In 2024, four bank employees conducted seminars for startup and small businesses focusing on budgeting and financial income analysis.

- In 2024, two bank employees conducted financial literacy seminars focusing on the prevention of financial exploitation and fraud to senior citizens located in a low-income census tract.

FLORIDA STATE

CRA RATING FOR FLORIDA STATE: Needs to Improve

The Lending Test is rated: Needs to Improve
The Community Development Test is rated: Needs to Improve

SUMMARY OF MAJOR FACTORS SUPPORTING RATINGS

The major factors supporting the bank's rating include:

LENDING TEST

- The geographic distribution of loans reflected poor penetration through the assessment area.

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

COMMUNITY DEVELOPMENT TEST

- The bank's community development performance demonstrated poor responsiveness to community development loans, qualified investments, and community development services, as appropriate considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

DESCRIPTION OF INSTITUTION'S OPERATIONS

The bank's FL operations were entirely within MSA 36740 (Orlando-Kissimmee-Sandford, FL) assessment area. Please refer to the Description of Institution's Operations under MSA 36740 (Orlando-Kissimmee-Sandford, FL) Full Scope Review.

SCOPE OF EVALUATION

The evaluation of FPBT's activities in FL consisted of a full scope review of the MSA 36740 (Orlando-Kissimmee-Sandford, FL) assessment area. This assessment area was evaluated under full scope procedures as it is the only assessment area in the State of Florida.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Conclusions regarding the bank's performance in FL were solely based on the performance in the MSA 36740 (Orlando-Kissimmee-Sandford, FL) assessment area. Specific comments regarding the lending, and community development tests were discussed under the MSA 36740 (Orlando-Kissimmee-Sandford, FL) Full Scope Review.

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

DESCRIPTION OF INSTITUTION'S OPERATIONS

The bank operated one branch in this assessment area for the majority of the review period. However, as of March 31, 2024, FPBT closed the Winter Park, FL branch.

According to the June 30, 2024 FDIC Summary of Deposit Report, 39 institutions operated 255 offices within this assessment area. FPBT ranked 36th with approximately $23.1 million in deposits, which represented less than 0.1% of the deposit market share and accounted for 2.5% of the bank's total branch deposits. This assessment area had no lending activities from January 1, 2023 to March 31, 2024. Competitors included large financial institutions, such as Truist Bank, Bank of America N.A., JPMorgan Chase Bank N.A., Wells Fargo Bank, N.A, and Regions Bank which captured 68.9% of total deposit market share.

SCOPE OF EVALUATION

Procedures

Examiners used full scope review examination procedures to evaluate the bank's performance in this assessment area.

PERFORMANCE CONTEXT

Demographic Characteristics

The assessment area included the entire Orange County. According to the 2020 U.S. Census, the population of this assessment area was 1,429,908. The assessment area consisted of 267 census tracts, of which 13 or 4.9% were low-income, 81 or 30.3% were moderate-income, 75 or 28.1% were middle-income, 92 or 34.5% were upper-income, and 6 or 2.2% were of unknown-income.

Income Characteristics

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

The table below depicts the MFI's for the assessment area.

Median Family Income			
Area	**2015 MFI**	**2020 MFI**	**% Change**
Assessment Area	$61,673	$70,209	13.8
MSA 36740 (Orlando-Kissimmee-Sanford, FL)	$62,609	$70,774	13.0
State of FL	$62,828	$69,670	10.9
Source: 2020 U.S. Census; MFIs have been inflation-adjusted and expressed in 2020 dollars.			

Housing Characteristics

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

The median age of housing stock in this assessment area was 37 years old, with 2.9% of the stock built before 1950. The median age of housing stock was 43 years in low-income census tracts and 42 years in moderate-income census tracts. According to the 2020 U.S. Census, the median housing value in this assessment area was $257,809 with an affordability ratio of 23.8. The median gross rent in the assessment area was $1,284 per month.

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

Housing Cost Burden

Housing costs were relatively expensive in this assessment area, which indicated that affordable housing for LMI individuals and families continued to be a challenge. According to HUD, within the assessment area, 51.3% of all rental households had rental costs that exceeded 30.0% of their incomes, 84.2% of low-income rental households had rental costs that exceeded 30.0% of their income, and 74.0% of moderate-income rental households had rental costs that exceeded 30.0% of their income.

According to HUD, within this assessment area, 24.0% of homeowners had housing costs that exceeded 30.0% of their incomes, 69.3% of low-income homeowners had housing costs that exceeded 30.0% of their income, and 46.1% of moderate-income homeowners had housing costs that exceeded 30.0% of their income. See the table below for more details.

Housing Cost Burden*						
Area	Cost Burden-Renters			Cost Burden-Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Assessment Area	84.2%	74.0%	51.3%	69.3%	46.1%	24.0%
MSA 36740 (Orlando-Kissimmee-Sanford, FL)	83.9%	74.5%	51.1%	66.2%	43.5%	23.5%
State of FL	81.1%	67.2%	51.3%	63.5%	38.7%	24.0%
**Housing Cost Burden is housing cost that equals 30.0% or more of household income.* *Source: HUD 2017-2021 Comprehensive Housing Affordability Strategy*						

Labor, Employment and Economic Characteristics

According to D&B, there were 86,801 businesses operating in this assessment area in 2024, of which 2.4% were located in low-income census tracts and 29.4% were located in moderate-income census tracts. Of the total businesses operating in the assessment area, 93.5% were small businesses with GAR of $1.0 million or less, of which 2.4% were located in low-income census tracts and 29.0% were located in moderate-income census tracts.

According to the BLS, unemployment rates in the assessment area were slightly below the state of FL unemployment rates.

Unemployment Rates		
Area	2023	2024
Assessment Area	2.9%	3.3%
MSA 36740 (Orlando-Kissimmee-Sanford, FL)	2.9%	3.3%
State of FL	3.0%	3.4%
Source: BLS, Local Area Unemployment Statistics		

Additional performance context for this assessment area is provided in the following table.

Assessment Area Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	13	4.9	10,936	3.5	3,159	28.9	68,125	22.0
Moderate	81	30.3	91,980	29.7	15,124	16.4	55,387	17.9
Middle	75	28.1	83,989	27.2	7,628	9.1	56,916	18.4
Upper	92	34.5	118,586	38.3	6,075	5.1	128,916	41.7
Unknown	6	2.2	3,853	1.2	1,172	30.4	0	0
Total Assessment Area	**267**	**100.0**	**309,344**	**100.0**	**33,158**	**10.7**	**309,344**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low	24,902	5,020	1.9	20.2	13,971	56.1	5,911	23.7
Moderate	168,066	62,535	23.8	37.2	80,804	48.1	24,727	14.7
Middle	147,043	73,485	28.0	50.0	54,596	37.1	18,962	12.9
Upper	196,662	119,840	45.7	60.9	50,422	25.6	26,400	13.4
Unknown	9,301	1,361	0.5	14.6	6,041	65.0	1,899	20.4
Total Assessment Area	**545,974**	**262,241**	**100.0**	**48.0**	**205,834**	**37.7**	**77,899**	**14.3**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1.0 Million		**Over $1.0 Million**		**Revenue Not Reported**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	2,048	2.4	1,945	2.4	89	1.9	14	1.6
Moderate	25,509	29.4	23,517	29.0	1,796	37.9	196	22.5
Middle	23,400	27.0	21,910	27.0	1,298	27.4	192	22.1
Upper	34,393	39.6	32,498	40.0	1,444	30.5	451	51.8
Unknown	1,451	1.7	1,327	1.6	107	2.3	17	2.0
Total Assessment Area	**86,801**	**100.0**	**81,197**	**100.0**	**4,734**	**100.0**	**870**	**100.0**
	% of Total Businesses:			**93.5**		**5.5**		**1.0**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1.0 Million		**Over $1.0 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	3	0.8	3	0.9	0	0	0	0
Moderate	76	20.8	70	20.6	6	22.2	0	0
Middle	105	28.7	97	28.6	8	29.6	0	0
Upper	179	48.9	166	49.0	13	48.1	0	0
Unknown	3	0.8	3	0.9	0	0	0	0
Total Assessment Area	**366**	**100.0**	**339**	**100.0**	**27**	**100.0**	**0**	**0**
	% of Total Farms:			**92.6**		**7.4**		**0**
Source: 2024 FFIEC and 2024 D&B								

Community Contact

Examiners conducted an interview with a representative from a nonprofit organization that provides affordable housing solutions to individuals in the assessment area. The contact noted that the cost of living increased in the county. The representative also indicated that there were not enough affordable homes or rental properties in the assessment area. The contact further stated that the Low-Income Housing Tax Credit appeared to be harder to qualify as the market becomes more competitive. The representative indicated that financial institutions could help to address the housing crisis by providing affordable housing credit terms. The representative also noted that banks can be more flexible and provide innovative programs to support the community.

Considering information from the community contact, as well as regional demographic and economic data, examiners determined that affordable housing represented the primary community development need in this assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

FPBT's performance under the Lending Test was rated Needs to Improve. The bank did not extend any home mortgage or small business loans in this assessment area during the evaluation period. The bank's performance was evaluated in the context of its limited presence and operations within the market. The bank had one branch in this assessment area, which closed March 31, 2024. The bank's deposits represented less than 0.1% of the deposit market share and accounted for 2.5% of the bank's total branch deposits.

Geographic Distribution of Loans

The geographic distribution of loans reflected poor penetration in this assessment area. During the evaluation period, FPBT did not originate any home mortgage or small business loans.

<u>Gap Analysis</u>

FPBT did not originate any loans in this assessment area during the evaluation period. As a result, lending penetration in LMI census tract reflected very poor performance.

Lending Gap Analysis			
Tract Income Levels	**Number of Tracts**	**Tracts with no Loans**	**Penetration %**
2024			
Low	13	13	0
Moderate	81	81	0
Middle	75	75	0
Upper	92	92	0
Unknown	6	6	0
2023			
Low	13	13	0
Moderate	81	81	0
Middle	75	75	0
Upper	92	92	0
Unknown	6	6	0
Source: FFIEC and Bank data January 1, 2023 to December 31, 2024			

<u>Home Mortgage Loans</u>

The geographic distribution of home mortgage loans reflected poor penetration, as the bank did not originate any home mortgage loans during the evaluation period.

Geographic Distribution of Home Mortgage Loans							
Geographic Income Level	**Bank And Aggregate Loans**						**Owner-Occupied Units %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
Low							
2024	0	0	1.8	0	0	1.6	1.9
2023	0	0	2.0	0	0	1.2	1.9
Moderate							
2024	0	0	20.1	0	0	15.5	23.8
2023	0	0	20.3	0	0	16.9	23.8
Middle							
2024	0	0	26.9	0	0	23.0	28.0
2023	0	0	27.4	0	0	21.2	28.0
Upper							
2024	0	0	50.9	0	0	59.5	45.7
2023	0	0	49.8	0	0	59.9	45.7
Unknown							
2024	0	0	0.3	0	0	0.4	0.5
2023	0	0	0.5	0	0	0.7	0.5
Totals							
2024	**0**	**100.0**	**100.0**	**0**	**100.0**	**100.0**	**100.0**
2023	**0**	**100.0**	**100.0**	**0**	**100.0**	**100.0**	**100.0**
Source: 2023-2024 FFIEC; 2020 U.S. Census							

Small Business Loans

The geographic distribution of small business loans reflected poor penetration throughout the assessment area as the bank did not originate any small business loans during the evaluation period.

Geographic Distribution of Small Business Loans							
Geographic Income Level	**Bank And Aggregate Loans**						**Total Businesses %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
Low							
2024	0	0	1.7	0	0	1.6	2.4
2023	0	0	1.8	0	0	1.4	2.4
Moderate							
2024	0	0	26.0	0	0	28.8	29.4
2023	0	0	26.8	0	0	30.2	28.6
Middle							
2024	0	0	24.9	0	0	24.5	27.0
2023	0	0	25.2	0	0	25.2	26.8
Upper							
2024	0	0	45.5	0	0	43.0	39.6
2023	0	0	44.3	0	0	41.3	40.4
Unknown							
2024	0	0	1.8	0	0	2.0	1.7
2023	0	0	1.7	0	0	1.8	1.8
Totals							
2024	**0**	**100.0**	**100.0**	**0**	**100.0**	**100.0**	**100.0**
2023	**0**	**100.0**	**100.0**	**0**	**100.0**	**100.0**	**100.0**
Source: 2023-2024 FFIEC; 2023-2024 D&B; 2020 U.S. Census: ACS							

Borrower Profile

The distribution of borrowers reflected, given the demographics of the assessment area, poor penetration among individuals of different income levels (including LMI) and businesses of different sizes. As noted previously, the bank did not originate any home mortgage or small business loans during the evaluation period.

Home Mortgage Loans

The borrower distribution of home mortgage loans reflected poor penetration throughout the assessment area, as the bank did not originate any home mortgage loans during the evaluation period.

Borrower Distribution of Home Mortgage Loans							
Borrower Income Level	**Bank And Aggregate Loans**						**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
Low							
2024	0	0	3.1	0	0	1.3	22.0
2023	0	0	2.5	0	0	0.9	22.0
Moderate							
2024	0	0	10.2	0	0	5.4	17.9
2023	0	0	10.3	0	0	5.2	17.9
Middle							
2024	0	0	18.0	0	0	13.4	18.4
2023	0	0	18.6	0	0	12.9	18.4
Upper							
2024	0	0	45.2	0	0	54.9	41.7
2023	0	0	47.3	0	0	52.5	41.7
Unknown							
2024	0	0	23.6	0	0	25.0	0
2023	0	0	21.3	0	0	28.5	0
Totals							
2024	**0**	**100.0**	**100.0**	**0**	**100.0**	**100.0**	**100.0**
2023	**0**	**100.0**	**100.0**	**0**	**100.0**	**100.0**	**100.0**
Source: 2023-2024 FFIEC; 2020 U.S. Census; Multifamily loans are not included in the borrower distribution analysis							

Small Business Loans

The borrower distribution of small business loans reflected poor penetration, as the bank did not originate any small business loans during the evaluation period.

Borrower Distribution of Small Business Loans							
Borrower Income Level	**Bank And Aggregate Loans**						**Total Businesses %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000's)**	**$%**	**$%**	
$1.0 Million or Less							
2023	0	0	54.3	0	0	37.6	92.8
Over $1.0 Million							
2023	0	0		0	0		5.9
Revenue Unknown							
2023	0	0		0	0		1.3
Totals							
2023	**0**	**100.0**		**0**	**100.0**		**100.0**
Source: 2023-2024 FFIEC Census; 2023-2024 D&B; 2020 U.S. Census: ACS							

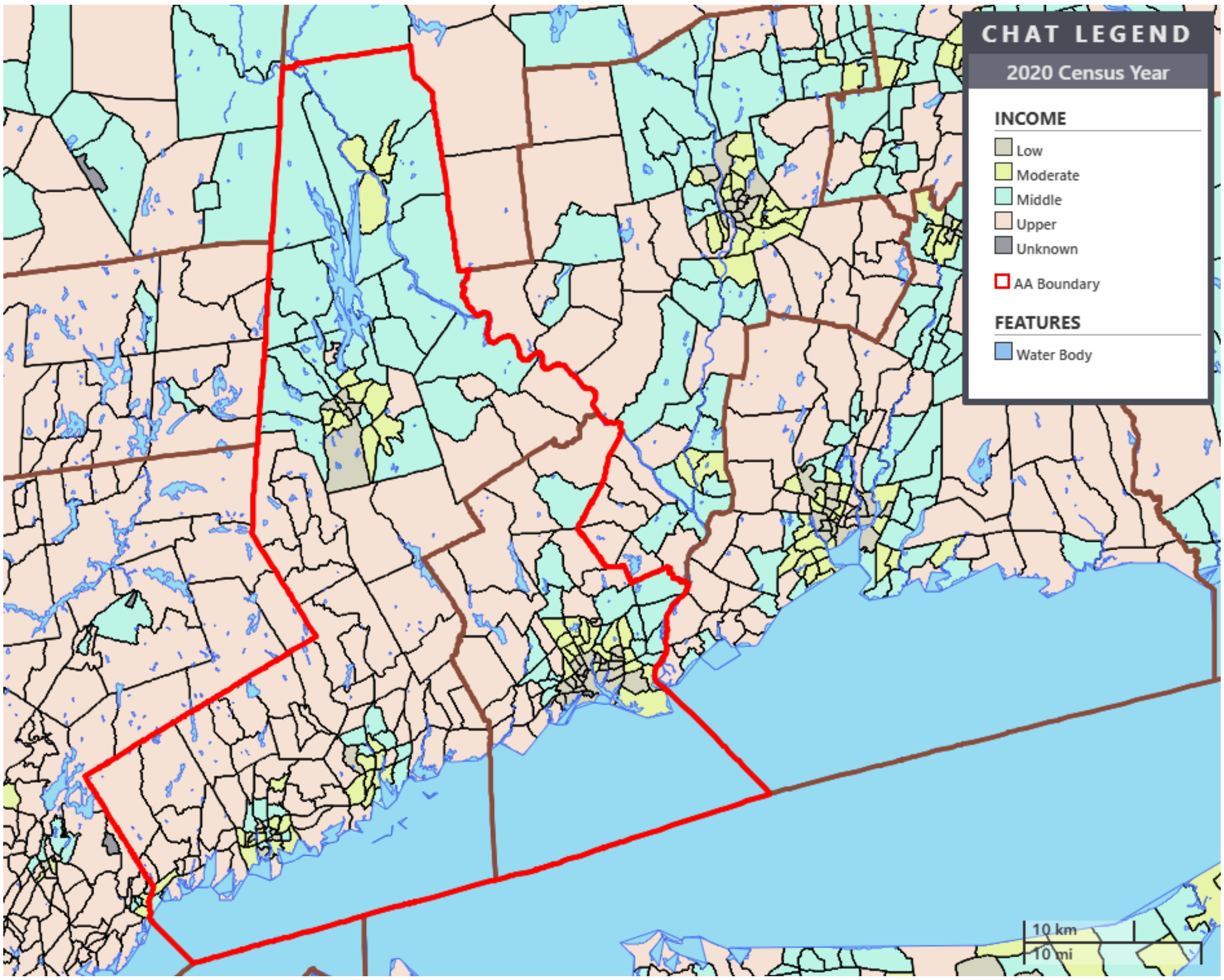
COMMUNITY DEVELOPMENT TEST

FPBT's performance under the Community Development Test was rated Needs to Improve. The bank did not originate any community development loans, extend any community development investments or grants, or provide community development services.

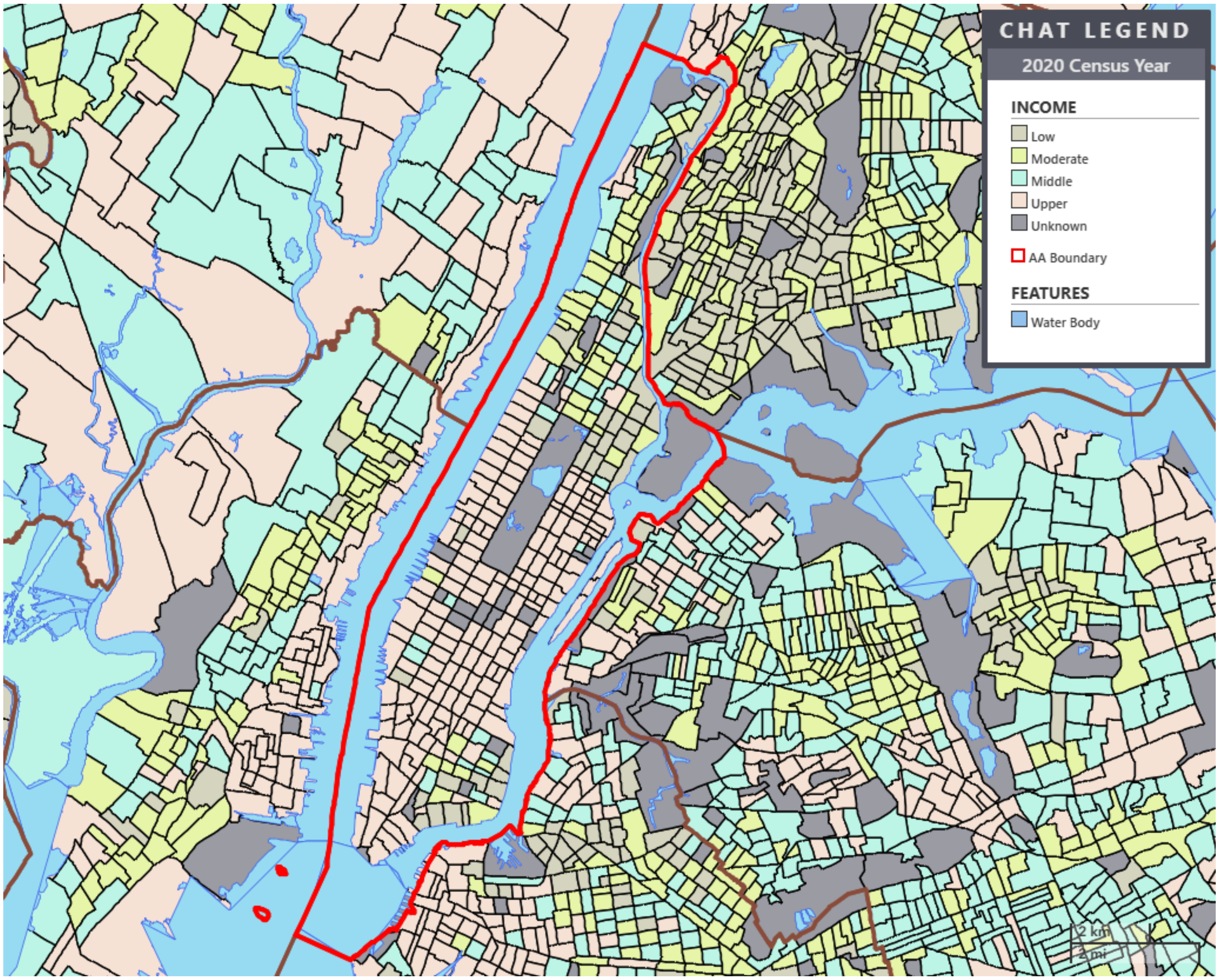
APPENDICES

APPENDIX A –ASSESSMENT AREA MAPS

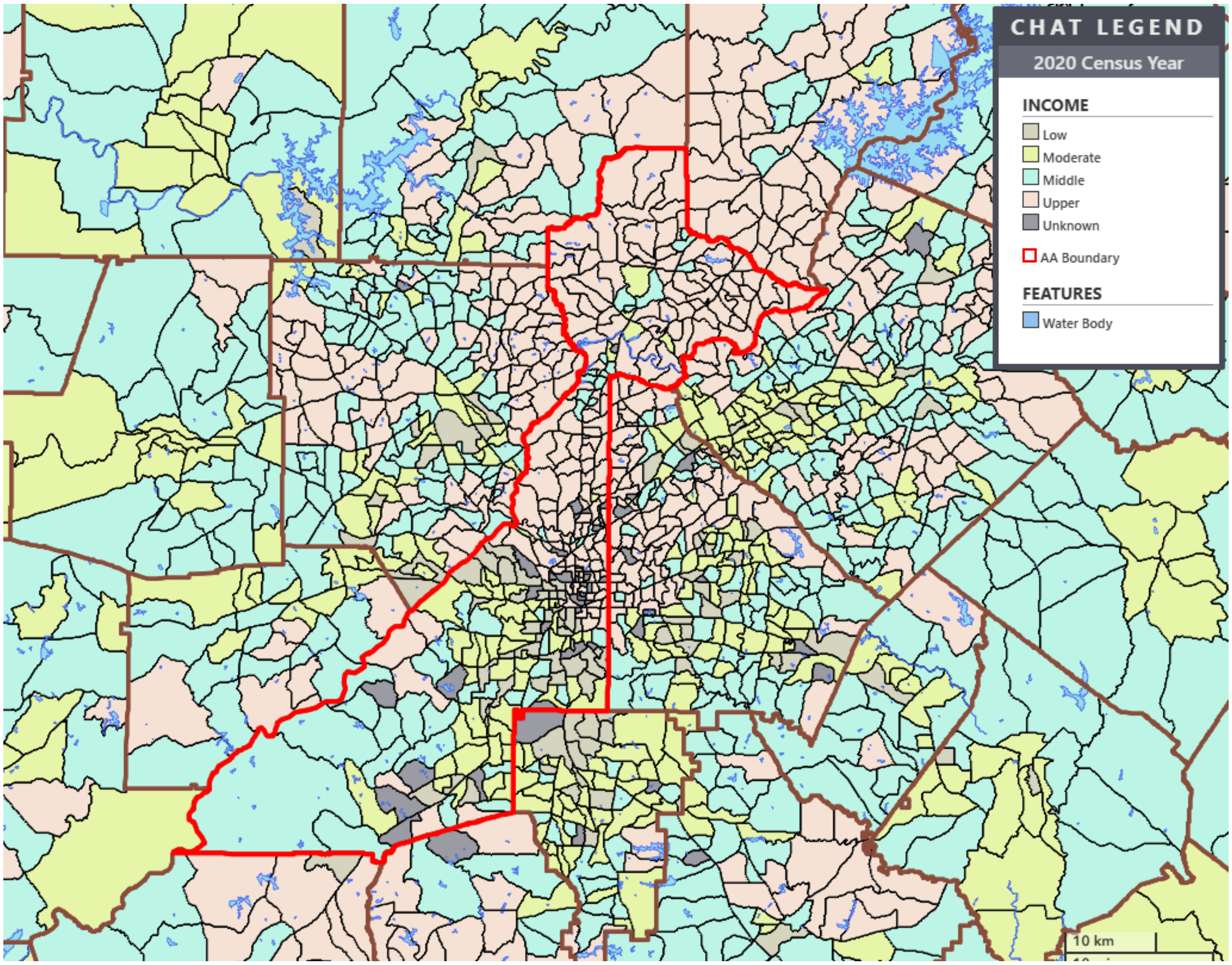
MSA 14860 (BRIDGEPORT-STAMFORD-DANBURY, CT)



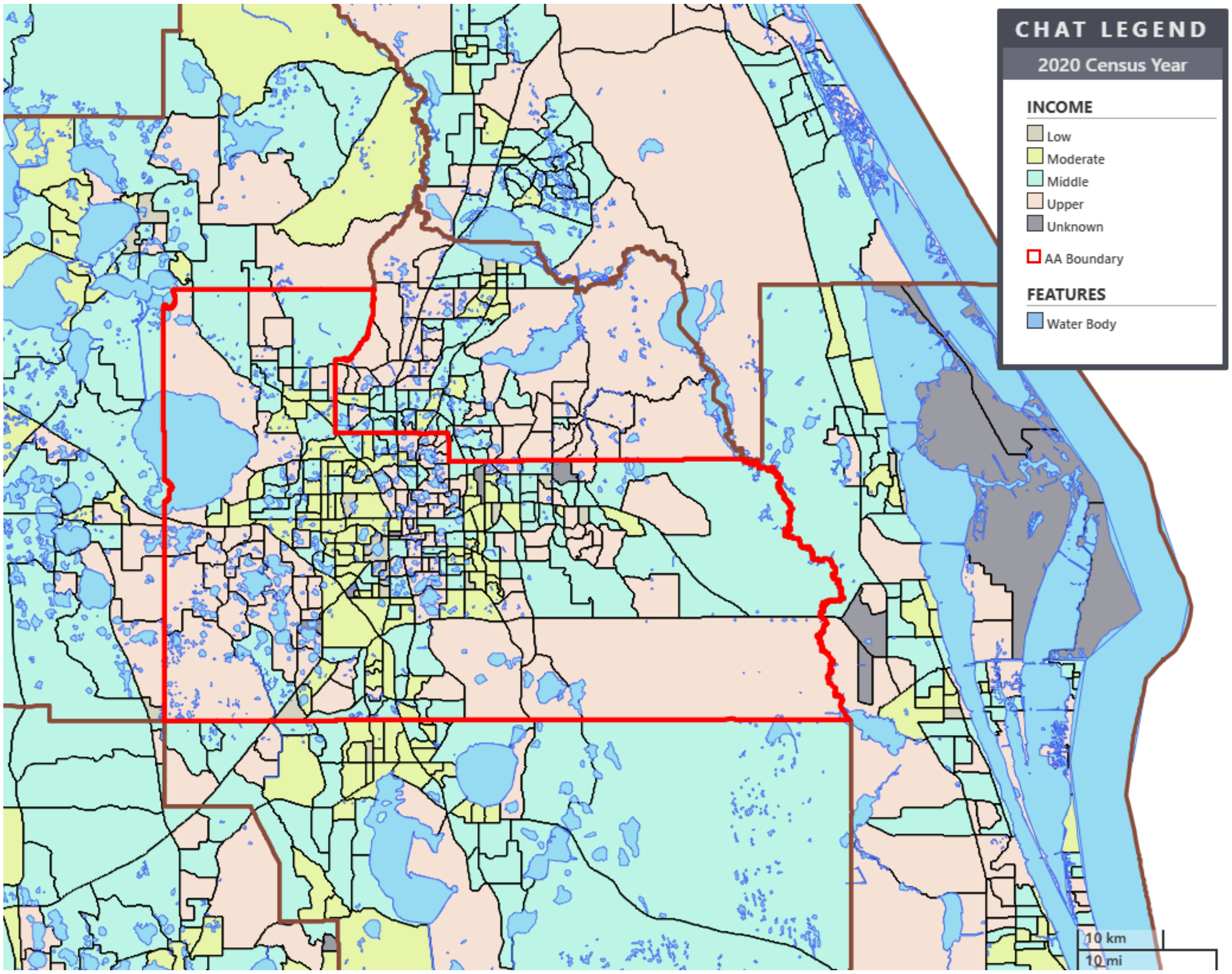
MD 35614 (NEW YORK-JERSEY CITY-WHITE PLAINS, NY-NJ)



MD 12054 (ATLANTA-SANDY SPRINGS-ROSWELL, GA)



MSA 36740 (ORLANDO-KISSIMMEE-SANFORD, FL)



APPENDIX B – GLOSSARY

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

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

Community development: All Agencies have adopted the following language. Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have GAR of $1.0 million or less; or activities that revitalize or stabilize LMI geographies.

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

(i) low- or moderate-income geographies;
(ii) Designated disaster areas; or
(iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on:
  a. Rates of poverty, unemployment, and population loss; or
  b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- or moderate-income individuals.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include 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 (for example, geographic distribution, borrower distribution, and

total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).
Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

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

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

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100.0% tabulations, the count of households always equals the count of occupied housing units.

Housing affordability ratio: The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

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

Low-income: Individual income that is less than 50.0% of the area median income, or median family income that is less than 50.0%, in the case of geography.

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

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

Middle-income: Individual income that is at least 80.0% and less than 120.0% of the area median income, or a median family income that is at least 80.0% and less than 120.0%, in the case of a geography.

Moderate-income: Individual income that is at least 50.0% and less than 80.0% of the area median income, or a median family income that is at least 50.0% and less than 80.0%, in the case of geography.

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

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

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

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

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Federal Financial Institutions Examination Council's (FFIEC) Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of $1.0 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for the Call Report. These loans have original amounts of $500,000.0 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Upper-income: Individual income that is more than 120.0% of the area median income, or a median family income that is more than 120.0%, in the case of geography.

APPENDIX C – SCOPE OF EVALUATION

SCOPE OF EVALUATION			
TIME PERIOD REVIEWED	Lending (HMDA and CRA-reportable loans): 01/01/2023 – 12/31/2024 Community Development Activity: 01/01/2024 – 12/31/2024		
FINANCIAL INSTITUTION	Fieldpoint Private Bank & Trust		**PRODUCTS REVIEWED** Home Mortgage Small Business
AFFILIATE(S)	**AFFILIATE RELATIONSHIP**		**PRODUCTS REVIEWED**
N/A	N/A		N/A
LIST OF ASSESSMENT AREAS AND TYPE OF EVALUATION			
ASSESSMENT AREA	**TYPE OF EXAMINATION**	**BRANCHES VISITED**	**OTHER INFORMATION**
MSA 14860 (Bridgeport-Stamford-Danbury, CT)	Full Scope Review	None	None
MD 35614 (New York-Jersey City-White Plains, NY-NJ)	Full Scope Review	None	None
MD 12054 (MD 12054 (Atlanta-Sandy Springs-Roswell, GA)	Full Scope Review	None	None
MSA 36740 (MSA 36740 (Orlando-Kissimmee-Sanford, FL)	Full Scope Review	None	None

APPENDIX D – SUMMARY OF STATE AND MULTISTATE MSA RATINGS

RATED AREAS	LENDING TEST RATING	COMMUNITY DEVELOPMENT TEST RATING	OVERALL RATING
STATE			
CONNECTICUT*	NTI	SAT	NTI
NEW YORK*	NTI	NTI	NTI
GEORGIA*	NTI	SAT	NTI
FLORIDA	NTI	NTI	NTI
OVERALL	**NTI**	**SAT**	**NTI**

*These assessment areas and ratings are weighted more heavily due to the significant volume of the bank's deposit and lending activity.