

PUBLIC DISCLOSURE

May 6, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Sunrise Bank
5604 North Atlantic Avenue
Cocoa Beach, Florida 32931**

RSSD ID NUMBER: 3370133

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

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

Table of Contents

	PAGE
INSTITUTION’S CRA RATING	
Institution’s Community Reinvestment Act (CRA) Rating	1
Summary of Major Factors Supporting Rating	1
INSTITUTION	
Scope of Examination	2
Description of Institution	2
Conclusion with Respect to Performance Criteria	4
RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS	5
FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	5
METROPOLITAN AREA – PALM BAY – FULL-SCOPE REVIEW	
Description of Institution’s Operations	6
Conclusion with Respect to Performance Criteria	12
METROPOLITAN AREA – ORLANDO – LIMITED-SCOPE REVIEW	
Description of Institution’s Operations	16
Conclusion with Respect to Performance Criteria	16
Appendix A – Scope of Examination	17
Appendix B – Definitions and General Information.....	18
Appendix C – Glossary	19
Appendix D – Combined Demographic Report and Lending Tables – Limited Review Area	22

INSTITUTION'S CRA RATING

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

Major factors supporting the institution's rating include:

- The bank's loan-to-deposit ratio is reasonable given the bank's asset size, financial condition, and assessment area credit needs.
- The bank originated a substantial majority of its small business loans within its assessment area.
- The geographic distribution of loans reflects reasonable distribution throughout the assessment areas.
- The distribution of lending reflects reasonable penetration among businesses of different revenue sizes.
- Neither the bank nor this Reserve Bank has received any CRA-related complaints since the previous evaluation.

INSTITUTION

SCOPE OF EXAMINATION

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

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

The evaluation included an analysis of small business loans originated from January 1, 2014 to December 31, 2017. A full-scope review was conducted of the Palm Bay assessment area, while the Orlando assessment area was reviewed using limited-scope procedures. When determining the overall rating, greater weight was placed on the bank's performance in the Palm Bay assessment area because the majority of the bank's lending is in this assessment area. The complaints performance criterion was not evaluated because neither the bank nor this Reserve Bank received any CRA-related complaints during the review period.

As part of this evaluation, examiners obtained information from two community contacts that are familiar with the economic and demographic characteristics as well as community development opportunities in the Palm Bay assessment area. Information obtained from these contacts was used to establish a context for the communities in which the bank operates and to gather information on the bank's performance. Specific information obtained from the community contacts is included in the applicable section of the evaluation for the full-scope assessment area.

DESCRIPTION OF INSTITUTION

Sunrise Bank is a full service community bank headquartered in Cocoa Beach, Florida. The bank has two offices, one located in Cocoa Beach, Florida and the other in Orlando, Florida. The Cocoa Beach location offers drive-thru service. Neither branch has an ATM; however, Allpoint ATMs and PRESTO ATMS are free of any surcharges to bank customers. The bank also offers mobile banking. Customers can access their accounts and pay bills online through the internet at www.sunrise.bank/. The bank also operates a mobile branch that travels to client businesses to conduct banking transactions. Although the bank originates a limited number of HMDA-reportable and consumer loans, Sunrise Bank primarily helps to meet the credit needs of its assessment area through commercial lending. It offers loans and lines of credit for capital equipment; commercial vehicles; commercial real estate purchase and refinance; construction; and other business purposes, including SBA loans. Sunrise Bank had assets totaling \$221.3 million as of December 31, 2018.

Branch Offices

As noted above, Sunrise Bank operates two branch offices within its assessment areas (AA); one in the Palm Bay-Melbourne-Titusville, Florida MSA (Palm Bay AA) and the other in the Orlando-Kissimmee-Sanford, Florida MSA (Orlando AA). Both assessment areas contain a diverse population, as well as low- and moderate-income

census tracts. As of December 31, 2017, the Palm Bay branch was located in a middle-income tract and the Orlando branch was located in a moderate-income tract. The Orlando branch was opened since the previous CRA performance evaluation (in March 2015); however, no branches have been closed in this time period.

Loan Portfolio

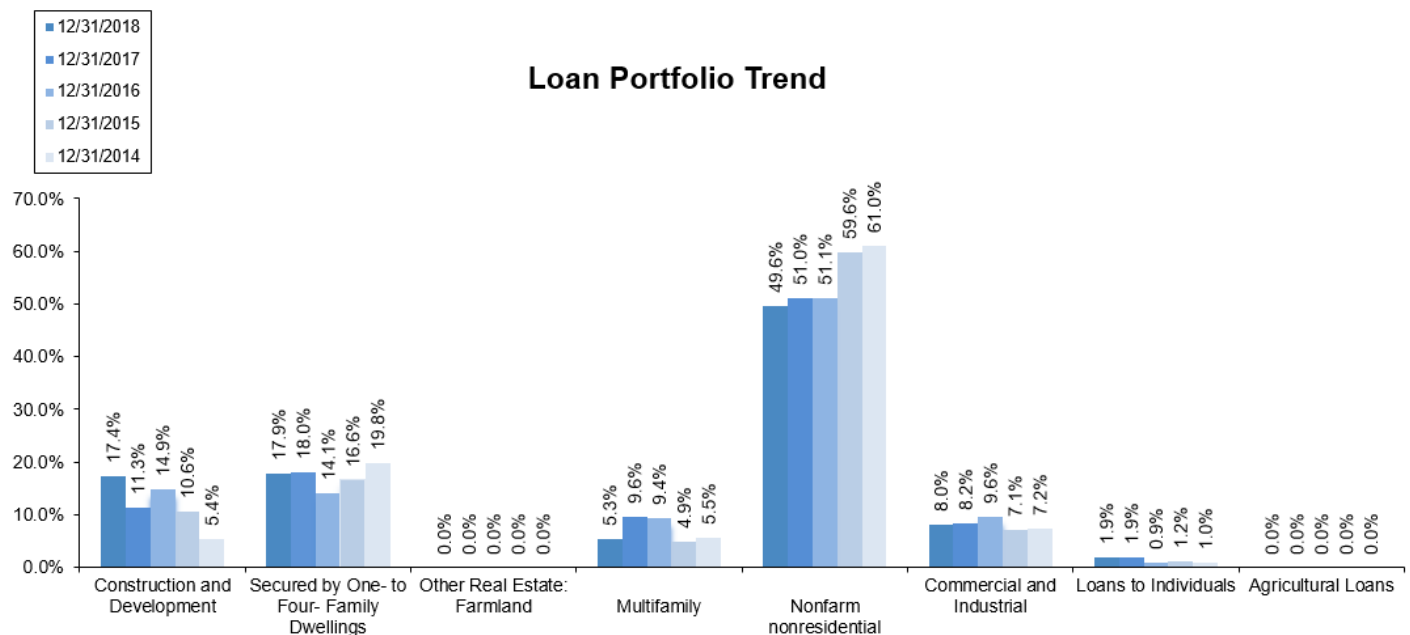
According to the December 31, 2018 Report of Condition (ROC), the bank's assets totaled \$221.3 million, which represents an increase of approximately \$109.4 million since the bank's previous CRA performance evaluation conducted in March 2015.

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

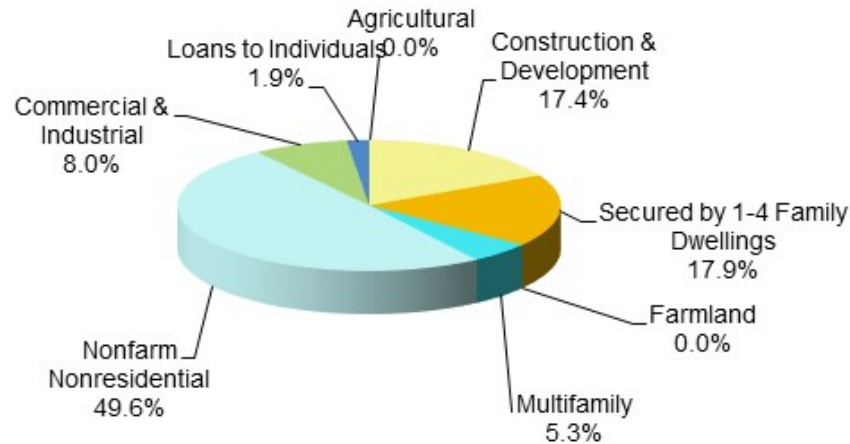
COMPOSITION OF LOAN PORTFOLIO										
Loan Type	12/31/2018		12/31/2017		12/31/2016		12/31/2015		12/31/2014	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	27,035	17.4%	15,850	11.3%	16,314	14.9%	9,517	10.6%	4,211	5.4%
Secured by One- to Four- Family Dwellings	27,817	17.9%	25,236	18.0%	15,446	14.1%	14,831	16.6%	15,323	19.8%
Other Real Estate: Farmland	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Multifamily	8,163	5.3%	13,519	9.6%	10,297	9.4%	4,346	4.9%	4,256	5.5%
Nonfarm nonresidential	77,097	49.6%	71,713	51.0%	55,878	51.1%	53,344	59.6%	47,203	61.0%
Commercial and Industrial	12,439	8.0%	11,560	8.2%	10,531	9.6%	6,317	7.1%	5,594	7.2%
Loans to Individuals	2,919	1.9%	2,629	1.9%	976	0.9%	1,089	1.2%	751	1.0%
Agricultural Loans	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	\$155,470	100.00%	\$140,507	100.00%	\$109,442	100.00%	89,444	100.00%	\$77,338	100.00%

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

As illustrated by the table above, the bank's loan portfolio as of December 31, 2018, consisted primarily of nonfarm, nonresidential loans (49.6 percent), followed by loans secured by one-to-four family dwellings (17.9 percent) and construction and development (17.4 percent). Significant growth by dollar amount in the loan portfolio occurred in nonfarm, nonresidential loans, which increased by 63.3 percent from December 31, 2014, to December 31, 2018. Additionally, sizeable growth by dollar amount occurred in construction and development loans, which increased by 542 percent. All other loan types showed an increase as well. The charts below further illustrate that nonfarm, nonresidential loans, loans secured by one-to-four family dwellings, and construction and development loans are the primary types of loans originated by the bank.



**Loan Portfolio
as of
12/31/2018**



Credit Products

The bank is primarily a commercial lender, offering a variety of credit products, including home equity lines of credit, residential mortgages, business and commercial real estate loans as well as limited consumer lending. The bank continues to focus on commercial lending, and also offers SBA loans.

CRA Compliance

Sunrise Bank complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its assessment areas. The bank received a “Satisfactory” rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta dated March 9, 2015 under the Small Institution Examination Procedures.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Overview

The bank’s lending test performance is rated satisfactory. Performance context factors such as economic conditions, competition, and demographics were considered when evaluating the bank’s lending performance. The bank’s loan-to-deposit ratio is reasonable. Based on an analysis of small business loans originated from January 1, 2014, through December 31, 2017, the bank originated a substantial majority of its loans to businesses located within the bank’s assessment area. The geographic distribution of loans reflects reasonable penetration throughout the assessment areas and the distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes.

Loan-to-Deposit Ratio

Sunrise Bank's loan-to-deposit (LTD) ratio is reasonable given the bank's asset size, financial condition, and assessment area credit needs. The bank's average LTD ratio for the twelve quarters ending December 31, 2017, was 83.8 percent. The bank's average LTD ratio was compared to other institutions considered "small banks" for CRA purposes operating in the bank's local area; those ratios ranged from 35.4 percent to 82.0 percent.

Assessment Area Concentration

The bank originated a substantial majority of its small business loans to businesses located within the bank's assessment areas. The number of loan transactions and the dollar volume of lending are both considered in the evaluation. The table below shows the number and percentage of loans reviewed that were located inside and outside of the bank's assessment areas.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Small Business	147	91.9	\$70,085	84.2	13	8.1	\$13,156	15.8
Total Small Bus. related	147	91.9	\$70,085	84.2	13	8.1	\$13,156	15.8
TOTAL LOANS	147	91.9	\$70,085	84.2	13	8.1	\$13,156	15.8

Note: Affiliate loans not included

A substantial majority of lending was to businesses located within the assessment area; 91.9 percent of small business loans by number and 84.2 percent of small business loans by dollar volume were made to businesses within the bank's assessment areas. This indicates the bank's willingness to originate loans that meet the credit needs of its assessment areas.

Distribution of Lending by Geography and Business Size

The geographic distribution of small business loans reflects reasonable penetration throughout the assessment areas given opportunity, the bank's financial condition, and competition in these markets. The distribution of lending reflects reasonable penetration among businesses of different revenue sizes and does not reveal any unexplained gaps in lending patterns. The analyses of small business lending within the full-scope assessment area are discussed in detail later in this report.

RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS

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

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified. The bank is in compliance with the substantive provisions of antidiscrimination laws and regulations (Regulation B – Equal Credit Opportunity and the Fair Housing Act).

METROPOLITAN AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PALM BAY ASSESSMENT AREA

Overview

The assessment area for Palm Bay has not changed since the last examination. The Palm Bay assessment area includes all of Brevard County, which makes up the Palm Bay-Melbourne-Titusville MSA. The bank operates one branch within the Palm Bay assessment area which, as of December 31, 2017, is located in a middle-income census tract. The bank's assessment area does not arbitrarily exclude any low- or moderate-income census tracts.

Population Information

According to the 2017 FFIEC census data, the assessment area population was 553,591 persons, which represents approximately 2.8 percent of the state of Florida's population of 19,645,772. The total population of the assessment area increased by 10,215 or 1.9 percent, from the 2016 to the 2017 FFIEC census data.

Income Characteristics

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the area. The following tables set forth the estimated median family income for 2014, 2015, 2016 and 2017 for the Palm Bay-Melbourne-Titusville, FL MSA. It also provides a breakdown of the estimated annual income based on income level.

Borrower Income Levels Palm Bay-Melbourne-Titusville, FL MSA

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2014	\$60,700	0	- \$30,349	\$30,350	- \$48,559	\$48,560	- \$72,839	\$72,840	- & above
2015	\$61,900	0	- \$30,949	\$30,950	- \$49,519	\$49,520	- \$74,279	\$74,280	- & above
2016	\$58,300	0	- \$29,149	\$29,150	- \$46,639	\$46,640	- \$69,959	\$69,960	- & above
2017	\$61,700	0	- \$30,849	\$30,850	- \$49,359	\$49,360	- \$74,039	\$74,040	- & above

The FFIEC estimated median family income for the Palm Bay AA increased by \$1,000 from 2014 to 2017. According to 2017 FFIEC census data, 141,695 families lived in the assessment area. Of those families, 20.2 percent were low-income; 18.6 percent were moderate-income; 20.6 percent were middle-income; and 40.6 percent were upper-income. Of the total families, 9.9 percent had incomes below the poverty level.

Demographic Data by Census Tracts

The 2016 FFIEC census data along with 2016 Dun & Bradstreet (D&B) information was used in the analysis of the bank's 2014 to 2016 small business lending performance. 2017 FFIEC census data and 2017 D&B information was used for the bank's 2017 lending performance analysis. The release of the 2017 FFIEC census data resulted in the reclassification of the income levels of some census tracts.

According to 2016 FFIEC census data, the Palm Bay assessment area consisted of 114 census tracts, 4 of which were low-income tracts (3.5 percent); 25 moderate-income (21.9 percent); 52 middle-income (45.6 percent); 30 upper-income (26.3 percent); and 3 tracts had unknown income levels (2.6 percent). According to the 2016 D&B data, 599 businesses in the Palm Bay assessment area were located in low-income tracts (1.8 percent); 7,254 in moderate-income tracts (22.2 percent); 13,775 in middle-income tracts (42.2 percent); 11,007 in upper-income tracts (33.7 percent); and 5 were in tracts with unknown income levels (less than 1 percent).

According to 2017 FFIEC census data, the demographics of the Palm Bay assessment area changed slightly, showing an increase in the number of low- and moderate-income tracts by three (and accordingly a decrease in the number of middle- and upper-income tracts by three) compared to the 2016 data. The AA consists of 114 census tracts, 6 of which are low-income tracts (5.3 percent); 26 are moderate-income (22.8 percent); 47 are middle-income (41.2 percent); 32 are upper-income (28.1 percent); and 3 tracts have unknown income levels (2.6 percent). According to the 2017 D&B data, there are 718 businesses in the Palm Bay assessment area located in low-income tracts (2.5 percent); 6,690 are in moderate-income tracts (23.7 percent); 11,200 are in middle-income tracts (39.7 percent); 9,607 are in upper-income tracts (34.0 percent); and 5 are in tracts with unknown income levels (less than 1 percent).

Housing Characteristics

According to the 2017 FFIEC census data, there are 271,654 housing units in the Palm Bay assessment area, of which 58.8 percent are owner-occupied units, 23.2 percent are rental units, and 18.0 percent are vacant units. In 2017 the median housing value was \$142,175 compared to \$159,000 for the state of Florida, and the median age of housing was 36 years. The affordability ratio in the assessment area is 34.4 compared to the affordability ratio for the state of Florida at 29.9. The affordability ratio is defined as the median household income divided by the median housing value. A higher ratio means that the housing is considered more affordable while a lower ratio means the housing is considered less affordable.

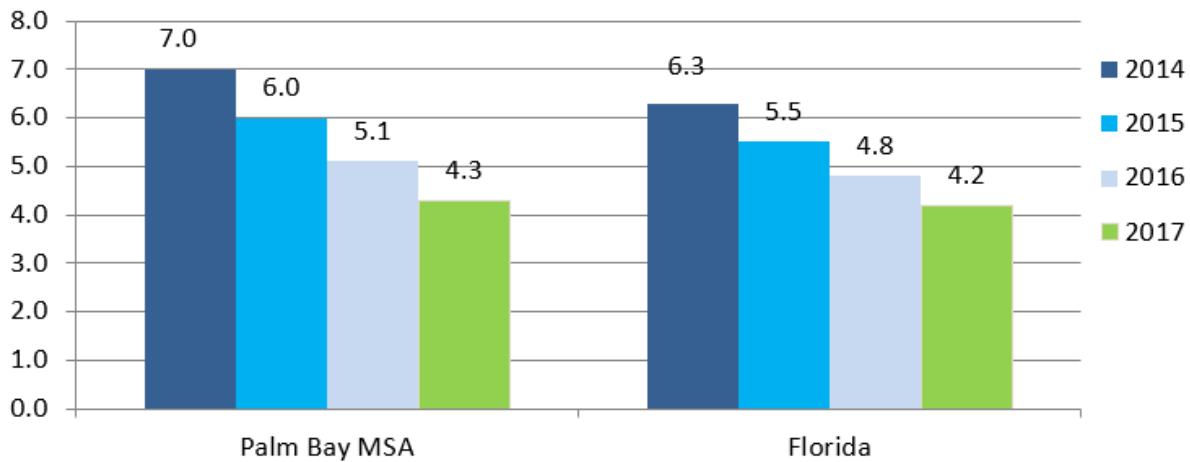
Employment Conditions

According to the Bureau of Labor Statistics, the number of employed persons in the Palm Bay MSA totaled 258,659 as of December 2017. The largest employers in the Palm Bay area are Health First, Harris Corporation, Brevard County, National Aeronautics and Space Administration (NASA), Northrop Grumman Corporation and Rockledge Regional Medical Center.¹

The following table shows the unemployment rate for the Palm Bay assessment area and for the State of Florida. According to the Bureau of Labor Statistics, the 2017 annual unemployment rate for Palm Bay MSA was 4.3 percent, just slightly higher than the rate for the state of Florida at 4.2 percent.

¹ Comprehensive Housing Market Analysis, Palm Bay-Melbourne-Titusville, Florida. US Department of Housing and Urban Development – Office of Policy Development and Research. 1 December 2017.

Unemployment Rates - Palm Bay



Competition

According to the June 30, 2018 FDIC Summary of Deposits Report for Brevard County, Sunrise Bank ranked 14th in deposit market share with \$115.4 million, or 1.2 percent of total deposits. During the same time period, there were 19 institutions operating 113 branches in the county. Most of the banking competition comes from other local, regional, and national banks with resources significantly greater than Sunrise Bank. Of the 19 institutions listed in the FDIC Summary of Deposits Report, 14 competitors have more than 10 offices outside the assessment area, and 11 of those competitors have over 100 offices outside the assessment area. Nonetheless, the level of competition does not appear to adversely affect Sunrise Bank's ability to serve the credit needs of the assessment area.

Community Contacts and Credit Needs

As part of the CRA evaluation, information was obtained from two representatives from a local non-profit organization that works with small businesses in the assessment area. The representatives discussed the major hurdles small business owners face in the area, along with opportunities for financial institutions to be more responsive to the needs of small businesses.

One specific issue that was mentioned by the community contact was the need for more micro-loans for small business owners. As business conditions continue to improve, more entrepreneurs are in need of non-traditional credit. These are typically small business loans to business owners that either have new businesses or have less than favorable credit histories due to a substantial amount of debt. Local entrepreneurs play an important role in the Palm Bay economy. Based on the 2017 D&B information, 92.7 percent of businesses in the assessment area have revenues of less than \$1 million.

Another issue mentioned was the need for financial institutions to get more involved with outreach programs. The contacts stressed the positive impact banks can have by participating in financial literacy workshops for local entrepreneurs, providing technical assistance, and sponsoring events that teach entrepreneurs how to obtain credit. Banks can engage with small business focused Community Development Financial Institutions (CDFIs) and loan funds to help meet important needs for small businesses.

General Economic and Business Characteristics

According to bank management and community contacts, economic conditions in the assessment area are improving. The unemployment rate continues to decrease as more companies move into the assessment area and current companies in the area expand. Sales in the housing market are stable for both new and existing homes. The area continues to be a popular destination for tourists due to the coastal location, which includes Port Canaveral, a major port for many cruise lines. Due to the favorable weather conditions, the area also attracts a significant number of retirees, with 31.0 percent of the population aged 60 or older, up from 25.0 percent in 2000. This has resulted in an increase in jobs and economic activity in the education and health services industry.²

Assessment Area Demographics

The following tables provide demographic characteristics of the bank's assessment area based on 2016 and 2017 FFIEC Census data, and 2016 and 2017 D&B data. Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis.

² Comprehensive Housing Market Analysis, Palm Bay-Melbourne-Titusville, Florida. US Department of Housing and Urban Development – Office of Policy Development and Research. 1 December 2017.

Combined Demographics Report

Assessment Area: Palm Bay

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	3.5	3,247	2.2	1,182	36.4	28,084	19.4
Moderate-income	25	21.9	27,537	19	3,345	12.1	27,230	18.8
Middle-income	52	45.6	67,905	46.8	4,286	6.3	31,147	21.5
Upper-income	30	26.3	46,420	32	1,633	3.5	58,648	40.4
Unknown-income	3	2.6	0	0	0	0	0	0
Total Assessment Area	114	100.0	145,109	100.0	10,446	7.2	145,109	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,221	1,999	1.2	27.7	3,903	54.1	1,319	18.3
Moderate-income	60,227	31,767	18.8	52.7	16,150	26.8	12,310	20.4
Middle-income	121,497	79,165	46.9	65.2	22,026	18.1	20,306	16.7
Upper-income	78,091	55,775	33.1	71.4	10,086	12.9	12,230	15.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	267,036	168,706	100.0	63.2	52,165	19.5	46,165	17.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	599	1.8	543	1.8	55	3	1	0.4
Moderate-income	7,254	22.2	6,553	21.5	648	34.8	53	23
Middle-income	13,775	42.2	13,001	42.6	699	37.6	75	32.6
Upper-income	11,007	33.7	10,451	34.2	455	24.5	101	43.9
Unknown-income	5	0	2	0	3	0.2	0	0
Total Assessment Area	32,640	100.0	30,550	100.0	1,860	100.0	230	100.0
	Percentage of Total Businesses:			93.6		5.7		.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	1	0.5	1	0.6	0	0	0	0
Moderate-income	37	20.2	35	19.4	1	50	1	100
Middle-income	58	31.7	58	32.2	0	0	0	0
Upper-income	87	47.5	86	47.8	1	50	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	183	100.0	180	100.0	2	100.0	1	100.0
	Percentage of Total Farms:			98.4		1.1		.5

Combined Demographics Report

Assessment Area: Palm Bay

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	5.3	4,027	2.8	1,529	38	28,644	20.2
Moderate-income	26	22.8	31,232	22	5,185	16.6	26,358	18.6
Middle-income	47	41.2	60,586	42.8	5,205	8.6	29,163	20.6
Upper-income	32	28.1	45,850	32.4	2,124	4.6	57,530	40.6
Unknown-income	3	2.6	0	0	0	0	0	0
Total Assessment Area	114	100.0	141,695	100.0	14,043	9.9	141,695	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	10,132	2,547	1.6	25.1	5,350	52.8	2,235	22.1
Moderate-income	67,176	33,668	21.1	50.1	20,546	30.6	12,962	19.3
Middle-income	116,027	69,406	43.5	59.8	24,143	20.8	22,478	19.4
Upper-income	78,319	54,033	33.8	69	13,098	16.7	11,188	14.3
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	271,654	159,654	100.0	58.8	63,137	23.2	48,863	18.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	718	2.5	647	2.5	69	3.7	2	1
Moderate-income	6,690	23.7	6,020	23	626	33.7	44	22.7
Middle-income	11,200	39.7	10,471	40	674	36.3	55	28.4
Upper-income	9,607	34	9,029	34.5	485	26.1	93	47.9
Unknown-income	5	0	2	0	3	0.2	0	0
Total Assessment Area	28,220	100.0	26,169	100.0	1,857	100.0	194	100.0
	Percentage of Total Businesses:			92.7		6.6		.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	2	1.2	2	1.3	0	0	0	0
Moderate-income	23	14.2	22	13.9	1	25	0	0
Middle-income	67	41.4	65	41.1	2	50	0	0
Upper-income	70	43.2	69	43.7	1	25	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	162	100.0	158	100.0	4	100.0	0	.0
	Percentage of Total Farms:			97.5		2.5		.0

2017 FFIEC Census Data and 2017 D&B Information

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA

Overview

The review analyzed 95 small business loans made in the Palm Bay assessment area. The bank's lending performance is satisfactory. The geographic distribution of loans reflects reasonable penetration throughout the assessment area. Also, the distribution of borrowers reflects reasonable penetration among businesses of different revenue sizes.

Geographic Distribution of Loans

For this analysis, the bank's geographic distribution of small business lending was compared to demographic information. The analysis includes the number of loan transactions compared to demographic data representing where small businesses are located. The number of transactions is given greater weight than dollar volume in the analysis because of the importance of small denomination commercial loans in meeting the credit needs of small businesses in the assessment area. Sunrise Bank's overall geographic distribution of small business loans reflects reasonable dispersion throughout the bank's assessment area.

The following table shows the geographic distribution of small business loans originated from January 1, 2014 through December 31, 2016, in the Palm Bay assessment area. The table also includes a comparison of the bank's small business lending to the demographic data.

Geographic Distribution of Small Business Loans

Assessment Area: Palm Bay

Tract Income Levels	Bank Lending & Demographic Data Comparison 2014, 2015, 2016				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	1.8%
Moderate	28	34.1%	\$12,015	30.9%	21.5%
Middle	33	40.2%	\$18,188	46.8%	42.6%
Upper	21	25.6%	\$8,640	22.2%	34.2%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>82</i>	<i>100.0%</i>	<i>\$38,844</i>	<i>100.0%</i>	<i>100.0%</i>

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

The following table shows the geographic distribution of small business loans originated from January 1, 2017 through December 31, 2017, in the Palm Bay assessment area.

Geographic Distribution of Small Business Loans

Assessment Area: Palm Bay

Tract Income Levels	Bank Lending & Demographic Data Comparison 2017				
	Count		Bank Dollar		Small Businesses
	#	%	\$ (000s)	\$ %	%
Low	0	0.0%	\$0	0.0%	2.5%
Moderate	1	7.7%	\$125	3.6%	23.0%
Middle	7	53.8%	\$1,661	47.9%	40.0%
Upper	5	38.5%	\$1,681	48.5%	34.5%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>\$3,467</i>	<i>100.0%</i>	<i>100.0%</i>

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

For 2014, 2015, and 2016, there was no small business lending in low-income tracts which was less than 1.8 percent of the small businesses in these tracts. However, the bank originated 34.1 percent of its small business loans in moderate-income tracts, which exceeded the percentage of small businesses in these tracts at 21.5 percent. In 2017, the bank again did not originate any small business loans in low-income tracts, which was less than 2.5 percent of the small businesses in these tracts. The bank originated only one loan in a moderate-income tract in 2017, which represents 7.7 percent of its small business loans. This level of lending was significantly less than the percentage of small businesses in these tracts at 23.0 percent. For both time periods under review, the majority of the bank's lending was in middle-income tracts, where the majority of small businesses are located. Considering the demographic data, area competition and the bank's deposit market share, Sunrise Bank's overall geographic distribution of small business loans reflects reasonable dispersion through the bank's assessment area.

Lending to Businesses of Different Sizes

The bank's lending to businesses of different revenue sizes is reasonable. For this analysis, the distribution of small business lending to businesses of different revenue sizes was compared to demographic information. The analysis includes the number of loan transactions and total dollar loan volume compared to demographic data representing small businesses by annual revenue size.

The following table shows, by business revenue and loan size, the number and dollar volume of small business loans originated by Sunrise Bank from January 1, 2014 through December 31, 2016, within the assessment area.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Palm Bay

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2014, 2015, 2016					
		Bank				Total Businesses	
		Count		\$ (000s)			
		#	%	\$	%	%	
BUSINESS REVENUE	\$1million or Less	40	48.8%	\$15,739	40.5%	93.6%	
	Over \$1 Million	35	42.7%	\$21,330	54.9%	5.7%	
	<i>Total Rev. available</i>	75	91.5%	\$37,068	95.4%	99.3%	
	Rev. Not Known	7	8.5%	\$1,776	4.6%	0.7%	
	<i>Total</i>	82	100.0%	\$38,844	100.0%	100.0%	
LOAN SIZE	\$100,000 or Less	27	32.9%	\$1,251	3.2%		
	\$100,001 - \$250,000	19	23.2%	\$3,437	8.8%		
	\$250,001 - \$1 Million	27	32.9%	\$14,998	38.6%		
	Over \$1 Million	9	11.0%	\$19,158	49.3%		
	<i>Total</i>	82	100.0%	\$38,844	100.0%		
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	9	22.5%	\$352	2.2%		
	\$100,001 - \$250,000	14	35.0%	\$2,493	15.8%		
	\$250,001 - \$1 Million	13	32.5%	\$6,894	43.8%		
	Over \$1 Million	4	10.0%	\$6,000	38.1%		
	<i>Total</i>	40	100.0%	\$15,739	100.0%		

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

According to 2016 FFIEC Census Data and 2016 Dun & Bradstreet data, the bank originated 40 (of a total 82) small business loans (48.8 percent) within the assessment area to businesses with less than \$1 million in annual revenue. In addition, the majority of loans made to small businesses (57.5 percent) were in amounts of \$250,000 or less. This performance indicates that a reasonable share of the bank's lending is meeting the community credit needs for very small business loans. At 48.8 percent, the bank's percentage of small business loans to small businesses is less than the 93.6 percent demographic benchmark; however, this is considered reasonable performance when taking into account performance context factors such as the bank's size and retail exposure, credit needs within the assessment area, and significant competition from much larger institutions.

The following table shows, by business revenue and loan size, the number and dollar volume of small business loans originated by Sunrise Bank from January 1, 2017 through December 31, 2017, within the assessment area.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Palm Bay

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison				
		2017				
		Bank				Total Businesses
		Count		\$ (000s)		
		#	%	\$	%	%
BUSINESS REVENUE	\$1million or Less	9	69.2%	\$2,418	69.7%	92.7%
	Over \$1 Million	4	30.8%	\$1,049	30.3%	6.6%
	<i>Total Rev. available</i>	13	100.0%	\$3,467	100.0%	99.3%
	Rev. Not Known	0	0.0%	\$0	0.0%	0.7%
	<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>\$3,467</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	4	30.8%	\$147	4.3%	
	\$100,001 - \$250,000	6	46.2%	\$898	25.9%	
	\$250,001 - \$1 Million	2	15.4%	\$1,140	32.9%	
	Over \$1 Million	1	7.7%	\$1,282	37.0%	
	<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>\$3,467</i>	<i>100.0%</i>	
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	3	33.3%	\$53	2.2%	
	\$100,001 - \$250,000	4	44.4%	\$503	20.8%	
	\$250,001 - \$1 Million	1	11.1%	\$580	24.0%	
	Over \$1 Million	1	11.1%	\$1,282	53.0%	
	<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>\$2,418</i>	<i>100.0%</i>	

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

According to 2017 FFIEC Census data and 2017 Dun & Bradstreet data, the bank originated 9 of 13 small business loans (69.2 percent) to businesses with less than \$1 million in annual revenue. A further breakdown by the size of loan shows 77.7 percent of the nine loans were for \$250,000 or less. This performance indicates the bank's willingness to meet the community credit needs for very small business loans. At 69.2 percent, the bank's percentage of small business loans to small businesses is less than the 92.7 percent demographic benchmark; however, this performance is reasonable for the same reasons as noted above.

METROPOLITAN AREA LIMITED-SCOPE REVIEW

The following assessment area was reviewed using limited-scope examination procedures. Through these procedures, conclusions regarding the institution's CRA performance are drawn from the review of available facts and data, including performance and demographic information. The limited-scope review revealed the bank's CRA performance in this assessment area is consistent with the area that received a full-scope review. Please refer to the tables in Appendix D for additional information regarding this area.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ORLANDO ASSESSMENT AREA

As previously stated, the bank's assessment areas have changed since the previous exam. The Orlando branch was previously an LPO, which converted to a full service branch effective December 5, 2016. The assessment area for Orlando consists of Orange and Seminole counties. Sunrise Bank has a small presence in the Orlando assessment area. The bank operates one branch in a moderate-income census tract. The Orlando assessment area accounts for approximately 35.0 percent of the bank's loan volume. According to the June 30, 2018 FDIC Summary of Deposits Report, Sunrise Bank ranked 32nd out of 40 banks in deposit market share.

CONCLUSIONS WITH RESPECT TO PERFORMANCE CRITERIA IN THE ORLANDO ASSESSMENT AREA

The limited-scope review revealed the bank's CRA performance in this assessment area is consistent with the area that received a full-scope review. The loan to deposit ratio, geographic distribution, assessment area concentration, and lending to businesses of different sizes were all considered reasonable in the Orlando assessment area.

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

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED			
January 1, 2014 through December 31, 2017			
FINANCIAL INSTITUTION		PRODUCTS REVIEWED	
Sunrise Bank, Cocoa Beach, Florida		Small Business Loans	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
None	None	None	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Palm Bay-Melbourne-Titusville, Florida MSA Brevard County	Full-Scope	Main Office	None
Orlando-Kissimmee-Sanford, Florida MSA Orange County Seminole County	Limited-Scope	None	None

APPENDIX B – DEFINITIONS AND GENERAL INFORMATION

Definitions

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

Rounding Convention

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

General Information

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

This document is an evaluation of the CRA performance of Sunrise Bank prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of May 6, 2019. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX C – GLOSSARY

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

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

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

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

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

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

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

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

APPENDIX C – GLOSSARY (Continued)

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

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

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

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

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

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

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

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

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

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

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

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

APPENDIX C – GLOSSARY (Continued)

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

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

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

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

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

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

APPENDIX D

Combined Demographics Report

Assessment Area: Orlando

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	2	3,481	0.9	1,320	37.9	71,291	19.3
Moderate-income	76	25.9	85,515	23.2	14,273	16.7	64,762	17.5
Middle-income	99	33.8	131,398	35.6	10,826	8.2	73,773	20
Upper-income	111	37.9	148,831	40.3	6,894	4.6	159,399	43.2
Unknown-income	1	0.3	0	0	0	0	0	0
Total Assessment Area	293	100.0	369,225	100.0	33,313	9.0	369,225	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,782	1,380	0.4	17.7	5,172	66.5	1,230	15.8
Moderate-income	167,576	58,992	16.8	35.2	80,301	47.9	28,283	16.9
Middle-income	240,416	128,303	36.5	53.4	77,279	32.1	34,834	14.5
Upper-income	237,309	163,314	46.4	68.8	43,943	18.5	30,052	12.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	653,083	351,989	100.0	53.9	206,695	31.6	94,399	14.5
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	725	0.7	655	0.6	61	0.9	9	1.1
Moderate-income	22,127	19.9	19,887	19.3	2,112	29.7	128	15.4
Middle-income	36,927	33.3	34,231	33.2	2,501	35.2	195	23.5
Upper-income	51,177	46.1	48,251	46.8	2,429	34.2	497	60
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	110,956	100.0	103,024	100.0	7,103	100.0	829	100.0
	Percentage of Total Businesses:			92.9		6.4		.7
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low-income	2	0.4	2	0.4	0	0	0	0
Moderate-income	66	12.2	62	12.4	4	9.8	0	0
Middle-income	184	34	165	33	19	46.3	0	0
Upper-income	289	53.4	271	54.2	18	43.9	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	541	100.0	500	100.0	41	100.0	0	.0
	Percentage of Total Farms:			92.4		7.6		.0

2016 FFIEC Census Data and 2016 D&B Information

APPENDIX D (Continued)

Combined Demographics Report

Assessment Area: Orlando

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	4.1	9,464	2.5	3,689	39	80,377	21.1
Moderate-income	80	27.3	91,761	24.1	19,509	21.3	64,646	17
Middle-income	95	32.4	125,793	33	15,289	12.2	70,989	18.6
Upper-income	105	35.8	154,115	40.4	7,998	5.2	165,121	43.3
Unknown-income	1	0.3	0	0	0	0	0	0
Total Assessment Area	293	100.0	381,133	100.0	46,485	12.2	381,133	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	20,664	3,662	1.1	17.7	13,403	64.9	3,599	17.4
Moderate-income	177,968	62,496	18.3	35.1	87,170	49	28,302	15.9
Middle-income	233,324	115,006	33.6	49.3	83,451	35.8	34,867	14.9
Upper-income	253,931	160,648	47	63.3	60,743	23.9	32,540	12.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	685,887	341,812	100.0	49.8	244,767	35.7	99,308	14.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,351	1.4	1,221	1.4	121	1.7	9	1.2
Moderate-income	21,112	21.6	18,757	20.8	2,231	31.5	124	17
Middle-income	31,065	31.7	28,507	31.6	2,393	33.8	165	22.6
Upper-income	44,399	45.3	41,625	46.2	2,341	33	433	59.2
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	97,927	100.0	90,110	100.0	7,086	100.0	731	100.0
	Percentage of Total Businesses:			92.0		7.2		.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1	0.2	1	0.2	0	0	0	0
Moderate-income	65	13.2	59	13.1	6	14.3	0	0
Middle-income	177	36	158	35.2	19	45.2	0	0
Upper-income	248	50.5	231	51.4	17	40.5	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	491	100.0	449	100.0	42	100.0	0	.0
	Percentage of Total Farms:			91.4		8.6		.0

APPENDIX D (Continued)

Geographic Distribution of Small Business Loans

Assessment Area: Orlando

Tract Income Levels	Bank Lending & Demographic Data Comparison 2016				
	Bank				Small Businesses
	Count	Dollar			
		#	%	\$ (000s)	
Low	0	0.0%	\$0	0.0%	0.6%
Moderate	6	25.0%	\$3,275	22.8%	19.3%
Middle	7	29.2%	\$3,109	21.6%	33.2%
Upper	11	45.8%	\$7,995	55.6%	46.8%
Unknown	0	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%	
<i>Total</i>	<i>24</i>	<i>100.0%</i>	<i>\$14,379</i>	<i>100.0%</i>	<i>100.0%</i>

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

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Orlando

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2016					
		Bank				Total Businesses	
		Count		\$ (000s)			
		#	%	\$	%	%	
BUSINESS REVENUE	\$1million or Less	8	33.3%	\$4,034	28.1%	92.9%	
	Over \$1 Million	13	54.2%	\$7,455	51.8%	6.4%	
	<i>Total Rev. available</i>	21	87.5%	\$11,489	79.9%	99.3%	
	Rev. Not Known	3	12.5%	\$2,890	20.1%	0.7%	
	<i>Total</i>	24	100.0%	\$14,379	100.0%	100.0%	
LOAN SIZE	\$100,000 or Less	4	16.7%	\$247	1.7%		
	\$100,001 - \$250,000	3	12.5%	\$509	3.5%		
	\$250,001 - \$1 Million	12	50.0%	\$7,558	52.6%		
	Over \$1 Million	5	20.8%	\$6,065	42.2%		
	<i>Total</i>	24	100.0%	\$14,379	100.0%		
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	1	12.5%	\$25	0.6%		
	\$100,001 - \$250,000	2	25.0%	\$309	7.7%		
	\$250,001 - \$1 Million	4	50.0%	\$2,450	60.7%		
	Over \$1 Million	1	12.5%	\$1,250	31.0%		
	<i>Total</i>	8	100.0%	\$4,034	100.0%		

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

APPENDIX D (Continued)

Geographic Distribution of Small Business Loans

Assessment Area: Orlando

Tract Income Levels	Bank Lending & Demographic Data Comparison 2017				
	Bank		Small Businesses		
	Count	Dollar			
	# %	\$ (000s) \$ %			%
Low	0 0.0%	\$0 0.0%			1.4%
Moderate	12 42.9%	\$5,267 39.3%			20.8%
Middle	7 25.0%	\$2,903 21.7%			31.6%
Upper	9 32.1%	\$5,225 39.0%			46.2%
Unknown	0 0.0%	\$0 0.0%			0.0%
Tr Unknown	0 0.0%	\$0 0.0%			
<i>Total</i>	<i>28 100.0%</i>	<i>\$13,395 100.0%</i>			<i>100.0%</i>

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

Small Business Loans by Business Revenue & Loan Size

Assessment Area: Orlando

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2017				
		Bank		Total Businesses		
		Count	\$ (000s)			
		# %	\$ %			%
BUSINESS REVENUE	\$1million or Less	19 67.9%	\$10,857 81.1%			92.0%
	Over \$1 Million	8 28.6%	\$1,938 14.5%			7.2%
	<i>Total Rev. available</i>	<i>27 96.5%</i>	<i>\$12,795 95.6%</i>			<i>99.2%</i>
	Rev. Not Known	1 3.6%	\$600 4.5%			0.7%
	<i>Total</i>	<i>28 100.0%</i>	<i>\$13,395 100.0%</i>			<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	5 17.9%	\$346 2.6%			
	\$100,001 - \$250,000	5 17.9%	\$984 7.3%			
	\$250,001 - \$1 Million	16 57.1%	\$9,052 67.6%			
	Over \$1 Million	2 7.1%	\$3,013 22.5%			
	<i>Total</i>	<i>28 100.0%</i>	<i>\$13,395 100.0%</i>			
LOAN SIZE & Rev \$1 Mill or Less	\$100,000 or Less	3 15.8%	\$250 2.3%			
	\$100,001 - \$250,000	3 15.8%	\$584 5.4%			
	\$250,001 - \$1 Million	11 57.9%	\$7,010 64.6%			
	Over \$1 Million	2 10.5%	\$3,013 27.8%			
	<i>Total</i>	<i>19 100.0%</i>	<i>\$10,857 100.0%</i>			

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