



## **PUBLIC DISCLOSURE**

September 21, 2015

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

BankUnited, National Association  
Charter Number 25028

14817 Oak Lane  
Miami Lakes, FL 33016

Office of the Comptroller of the Currency

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

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## Overall CRA Rating

### General Information and Overall CRA Rating

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 (LMI) neighborhoods, consistent with the 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 BankUnited, National Association (BankUnited or bank) issued by the Office of the Comptroller of the Currency (OCC), the institution’s supervisory agency, for the evaluation period starting January 1, 2012 and ending December 31, 2014. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

**Institution’s CRA Rating:** This institution is rated **Satisfactory**.

The following table indicates the performance level of BankUnited with respect to the Lending, Investment, and Service Tests:

Performance Levels	BankUnited Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The bank originates a majority of loans inside its assessment areas (AA);
- Lending activity in Florida is adequate and lending activity in New York is excellent;
- The bank’s overall geographic distribution is excellent in Florida and good in New York;
- The overall borrower income distribution is adequate in Florida and New York;

- Community Development (CD) lending has a significantly positive impact on the Lending Test in New York and a positive impact on the Lending Test in Florida. CD lending demonstrated good responsiveness to the needs of the AA. Loans supported affordable housing and activities that promote economic development in the AAs.
- The bank has an excellent level of qualified CD investments that demonstrated good responsiveness to the needs of the AA;
- The bank branches are reasonably accessible to essentially all portions of geographies and individuals of different income levels in the Florida assessment area, and readily accessible to all portions of geographies and individuals of different income levels in the New York assessment area. Branch hours do not vary in a way that would inconvenience portions of the AA, particularly LMI individuals. The record of opening or closing branches has not adversely affected access to banking services;
- BankUnited provides an excellent level of CD services in both AAs.

## Definitions and Common Abbreviations

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

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

**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 MA/assessment area.

**Census Tract (CT):** Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

**Community Development:** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, 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 Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income:** Individual 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 (MA)/assessment area.

**Median Family Income (MFI):** The median income derived from the United States Census Bureau's American Community Survey data every 5 years and used to determine the income level category of geographies. Also, it is the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level of individuals within a geography. For any given geography, the median is the point at which half of the families have income above it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A

Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

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

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

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

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

**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 multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) 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.

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

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

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



## Description of Institution

BankUnited is an interstate national bank headquartered in Miami Lakes, Florida, and is a wholly owned subsidiary of BankUnited, Inc. (BankUnited, Inc. or BKU). BankUnited conducts business in the states of Florida and New York. Per the December 31, 2014 FFIEC Call Report, BankUnited had total assets of \$19.06 billion, total loans of \$12.42 billion, and tier 1 capital of \$1.64 billion.

According to the FDIC Deposit Market Share Report dated June 30, 2014, BankUnited had deposits of \$12.25 billion. As of December 31, 2014, the bank had net loans of \$12.42 billion, representing 65.14 percent of total assets. Approximately 66.91 percent of the bank's loan portfolio was comprised of real estate loans, and primary real estate products included 1-4 family residential properties (43.56 percent), commercial real estate (33.83 percent) and multifamily (22.59 percent). Commercial and industrial (C&I) loans made up 21.59 percent of the total loan portfolio.

BankUnited is a full-service bank with 106 full-service banking offices and 67 deposit-taking automated teller machines (ATMs) in Florida and New York. The bank's business strategy focuses on relationship based commercial banking for growing companies and their executives, commercial and middle-market businesses, and consumers within the bank's market areas. Loan origination is focused on the commercial portfolio, and residential mortgages are originated through the retail branches and purchased in the secondary market. BankUnited offers traditional deposit and lending products such as checking accounts, money market deposit accounts, savings accounts and certificates of deposit, small business loans, commercial real estate loans, commercial lines of credit, letters of credit, residential mortgages, and consumer loans.

Acquisition activity during the evaluation period was limited to the acquisition of Herald National Bank (Herald), a commercial bank headquartered in New York, with assets of approximately \$508 million, on February 29, 2012. The majority of Herald's loan portfolio was comprised of C&I and commercial real estate loans. The deposits were primarily transaction and money market accounts. The Herald acquisition resulted in the expansion of the bank's market footprint into New York, and has been considered in this evaluation.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The bank received a Satisfactory rating in its previous CRA evaluation dated October 9, 2012.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We analyzed home purchase, home refinance mortgage, multifamily loans (only for the New York AA) that the bank reported under the HMDA and small loans made to businesses the bank reported under the CRA, for the period of January 1, 2012 through December 31, 2014. Home improvement loans are not a primary loan product for the bank; therefore, we did not evaluate this product separately. We did not analyze home improvement loans because the bank originated a very low number (20 or less) in all of its AAs, and the analysis would not contribute meaningfully to the overall conclusions and ratings. Performance tables 1 through 6 and 8 through 11 in appendix D include only data covered by the 2010 Census. We reviewed CD loans, investments, and services for the period of October 9, 2012 through December 31, 2014.

### Data Integrity

We conducted a data integrity review to verify the accuracy of the bank's HMDA and CRA loan data and the appropriateness of CD activities provided for consideration in our evaluation. This included testing of CD loans, investments, and services for accurate reporting, and to determine if they qualify as CD as defined in the CRA regulation.

### Selection of Areas for Full-Scope Review

We selected at least one AA in each state where the bank has an office for a full-scope review. Full-scope reviews consider performance context, quantitative, and qualitative factors. In general, the AAs selected for the full-scope review were chosen because they represented a significant portion of the bank's deposit base and lending business in that state. The other AAs in each state were analyzed using limited-scope procedures. Limited-scope procedures consider quantitative factors only. Refer to the "Scope" section under each State Rating section for details regarding how we selected the areas for review.

### Ratings

The bank's overall rating is a blend of the state ratings. The state ratings were based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under each State Rating section for details regarding how the areas were emphasized in arriving at the respective ratings. The state of Florida received the greatest emphasis in our conclusions because it represented the bank's most significant market in terms of deposit concentrations, branch distribution, and CRA reportable loans, and the bank had not been in the state of New York for the full evaluation period. At June 30, 2014, the state of Florida represented 88.82 percent of total deposits, 94.34 percent of the branch network, and 90.79 percent of the CRA reportable loans during the evaluation period.

Additionally, when evaluating the bank's performance under the Lending Test, we placed greater emphasis on the bank's distribution of small business loans than the distribution of home mortgage loans. Within the home mortgage category, greater emphasis was placed on home purchase, with home refinance loans receiving less emphasis. We placed more emphasis on small business loans since it is the bank's primary loan product. Secondary emphasis was placed on home mortgage loan performance. Both small business loans and home mortgage loans were identified as credit needs in the bank's AA.

### **Inside/Outside Ratio**

This ratio is a bank wide calculation and not calculated by individual rating area or AA. Analysis is limited to bank origination and purchases. For the combined three-year evaluation period, BankUnited originated and purchased a majority of all loan products inside the bank's AAs (59.52 percent). The percentage in number of loans made (originated and purchased) inside the AAs by loan type are as follows: small loans to businesses (90.12 percent), home purchase loans (44.31 percent), home refinance loans (23.89 percent), and home improvement loans (100 percent). The bank's primary strategic focus is on commercial lending activities. As a result, the bank purchases residential mortgages, and a majority of them are outside the bank's AA.

## **Fair Lending or Other Illegal Credit Practices Review**

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

The OCC did not identify evidence of discriminatory or other illegal credit practices with respect to this institution.

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

## State Rating

### State of Florida

<b>CRA Rating for Florida:</b>	<b>Satisfactory</b>
<b>The Lending Test is rated:</b>	<b>High Satisfactory</b>
<b>The Investment Test is rated:</b>	<b>Outstanding</b>
<b>The Service Test is rated:</b>	<b>High Satisfactory</b>

The major factors that support this rating include:

- An adequate level of lending for home mortgage loans and small business loans;
- An overall excellent geographic distribution of loans as evidenced by good home mortgage geographic distribution and excellent small business geographic distribution;
- An overall adequate borrower income distribution of loans as evidenced by good home mortgage borrower distribution and poor small business borrower distribution;
- CD loans demonstrated good responsiveness to community needs, and had a positive impact on the Lending Test;
- An excellent level of qualified investments that provided good responsiveness to community needs in the AA;
- A branch distribution that was reasonably accessible to essentially all portions of geographies and individuals of different income levels in the assessment area; and
- An excellent level of CD services that was responsive to community needs.

### Description of Institution's Operations in Florida

BankUnited has eleven assessment areas (AA) within the state of Florida. These AAs include the Miami-Miami Beach-Kendall, FL MD (Miami AA), the Cape Coral-Fort Myers, FL MSA (Cape Coral AA); the Ft. Lauderdale-Pompano Beach-Deerfield Beach, FL MD (Ft. Lauderdale AA), Naples-Immokalee-Marco Island, FL MSA (Naples AA), North Port-Sarasota-Bradenton, FL MSA (North Port AA), Orlando-Kissimmee-Sanford, FL MSA (Orlando AA), Port St. Lucie, FL MSA (Port St. Lucie AA), Punta Gorda, FL MSA (Punta Gorda AA), Sebastian-Vero Beach, FL MSA (Sebastian AA), Tampa-St. Petersburg-Clearwater, FL MSA (Tampa AA), and the West Palm Beach-Boca Raton-Delray Beach, FL MSA (West Palm Beach AA).

The Miami AA is comprised of Miami Dade County; the Cape Coral AA is comprised of Lee County; the Ft. Lauderdale AA is comprised of Broward County; the Naples AA is comprised of Collier County; the North Port AA is comprised of Manatee and Sarasota Counties; the Orlando AA is comprised of Orange and Seminole Counties; the Port St. Lucie AA is comprised of Martin and St. Lucie Counties; the Punta Gorda AA is comprised of Charlotte County; the Sebastian AA is comprised of Indian River

County; the Tampa AA is comprised of Hillsborough and Pinellas Counties; and the West Palm Beach AA is comprised of Palm Beach County.

BankUnited provides a full range of loan and deposit products to all AAs. BankUnited has 100 branches within the state, representing 94.34 percent of the bank's total branch network. There were 19 branch openings and 14 branch closings in the state during the evaluation period, four openings and three closing were within the Miami AA. BankUnited has 63 deposit-taking ATMs within the state, 20 were in the Miami AA, 15 were in the Ft. Lauderdale AA, and 12 were in the West Palm Beach AA. As of June 30, 2014, the bank ranked eighth in deposits within all AAs in the State of Florida, representing a 3.24 percent market share. The five largest competitors represent 51.99 percent of the market share. BankUnited's Florida statewide deposits totaled \$10.88 billion, representing 88.82 percent of the bank's total deposits. The Miami AA is the bank's largest AA and accounts for 52.95 percent of deposits in Florida and 47.03 percent of the bank's total deposits.

The banking industry is highly competitive in the Miami AA, and includes branches of national and regional banks, local community banks, credit unions and other nonbank financial institutions. As of June 30, 2014, BankUnited ranked sixth in AA deposits, representing a 5.63 percent market share. The five largest competitors in the AA include Wells Fargo Bank, Bank of America, Citibank, JPMorgan Chase Bank, and SunTrust Bank, which represent 48.41 percent of the deposit market share in the AA.

Refer to the market profiles for the state of Florida in appendix C for detailed demographics and other performance context information for AAs that received a full-scope review.

## **Scope of Evaluation in Florida**

For the state of Florida, we completed a full-scope review of the Miami AA, and limited-scope reviews of the Cape Coral AA, Ft. Lauderdale AA, Naples AA, North Port AA, Orlando AA, Port St. Lucie AA, Punta Gorda AA, Sebastian AA, Tampa AA, and West Palm Beach AA. The Miami AA received a full-scope review due to the high percentage of deposits in this area (52.95 percent within Florida, or 47.03 percent bank wide). The Miami AA also had the largest volume of total reportable loans at 33.36 percent within Florida, or 30.29 percent bank wide. Branch distribution within the state shows the Miami AA with 26 percent, Ft. Lauderdale with 24 percent, and West Palm Beach with 17 percent, of branches, respectively, in Florida. The Miami AA received the most emphasis in determining the final state rating because it is the full-scope AA. The volumes of home improvement loans, multifamily loans and small farm loans were insufficient to meaningfully impact conclusions or ratings in the state.

Refer to appendix A for more information on the Florida AAs. Refer to appendix C for the Miami AA market profile, detailed demographics, and other performance context information for AAs that received full-scope reviews.

## **LENDING TEST**

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

The bank's performance under the Lending Test in the state of Florida is rated High Satisfactory. Based on the full-scope review, the bank's performance in the Miami AA is adequate.

### **Lending Activity**

Refer to table 1 “Lending Volume” in the state of Florida section of appendix D for the facts and data used to evaluate the bank’s lending activity.

Home mortgage lending activity in the Miami AA is adequate considering the large number of lenders and strong competition for all types of loans in the AA. Based upon FDIC Deposit Market Share data as of June 30, 2014, BankUnited achieved a 5.63 percent market share of deposits, ranking sixth among 68 financial institutions in the AA, equivalent to being in the top 8.82 percent of total depository banks. Based upon 2013 Peer Mortgage Data, BankUnited achieved a 0.28 percent market share of home purchase loans, ranking 58<sup>th</sup> among 386 reporting lenders, equivalent to being in the top 15.03 percent of lenders. The bank achieved a 0.22 percent market share of home refinance loans, ranking 50<sup>th</sup> among 416 reporting lenders, equivalent to being in the top 12.02 percent of lenders.

The small business lending activity is adequate, given the small business lending competition within the AA. BankUnited achieved a 0.54 percent market share of small loans to businesses, ranking 18<sup>th</sup> among 101 reporting lenders, equivalent to being in the top 17.82 percent of lenders. The top five lenders for small business lending are national credit card banks and control a majority of the market. Collectively, the top five lenders have 76.67 percent of the market share. Individual market shares of these national credit card banks ranged from 8.58 percent to 34.19 percent.

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

Overall, BankUnited’s geographic distribution of loans in the Miami AA is excellent. In performing our analysis, we placed greater emphasis on the bank’s small business lending, rather than home mortgage lending, as small business loans represented the majority of the bank’s reportable lending activity. Within home mortgage lending, more emphasis was given to home purchase loans based on volume of originations during the evaluation period.

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

The geographic distribution of home mortgage loans is good. As described in the profile of the Miami AA, there are several factors affecting mortgage lending in both low- and moderate-income geographies. The levels of owner-occupied housing are low and rental properties represent the majority of housing units in both low- and moderate-income geographies. Additionally, the median age of the housing stock in those geographies is very high, contributing to lower median housing values. The lower values can affect the ability of homeowners to refinance mortgages because of reduced equity values in their homes. Although the older housing stock typically has a lower purchase price, it is often more costly for the homeowners to maintain. As a result, there are fewer lending opportunities in LMI geographies.

Refer to tables 2, 3, 4, and 5 in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations/purchases.

The geographic distribution of home purchase loans is excellent. The percentage of loans in low- and moderate-income geographies exceeded the percentage of owner-occupied units in these geographies. Overall, the bank’s market share was excellent for home purchase loans in low- and moderate-income geographies. BankUnited’s market share in both low-and moderate-income geographies exceeded the overall market share for home purchase loans.

The geographic distribution of home refinance loans is very poor. The percentage of loans in both low- and moderate-income geographies were significantly below the percentage of owner-occupied units in these geographies. Overall, the bank's market share in low- and moderate-income geographies was very poor for refinance loans. The bank's market share in low- and moderate-income geographies was significantly below the overall market share for home refinance loans.

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

Refer to table 6 in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The percentages of loans in low- and moderate-income geographies exceeded the percentages of businesses in those geographies. Overall, the bank's market shares in low- and moderate-income geographies were excellent. The bank's market shares in low- and moderate-income geographies exceeded the overall market share for small business loans.

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

We reviewed summary reports and analyzed BankUnited's home mortgage lending and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

The overall distribution of lending by income level of borrower is adequate. As noted previously, we placed greater emphasis on the bank's small business lending, rather than home mortgage lending, as small business loans represented the majority of the bank's reportable lending activity. Within home mortgage lending, more emphasis was given to home purchase loans based on volume of originations during the evaluation period. Additionally, we considered factors having an effect on the bank's ability to lend in the AA, including the level of families living below the poverty level, the general affordability of housing to LMI borrowers, and unemployment rates, in our analysis of lending performance in the AA.

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

Refer to tables 8, 9 and 10 in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Overall, the borrower distribution of home mortgage loans is good. In evaluating the borrower distribution of home loans, it is important to note that according to 2010 U.S. Census data, 13.76 percent of families in the AA are below the poverty level. In addition, unemployment in the AA remains slightly higher than the national average, 5.90 percent versus 5.60 percent, respectively, at December 2014. These factors make lending to LMI individuals challenging.

The overall borrower distribution of home purchase loans is excellent. The percentage of home purchase loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-



income families. However, the high median housing price, when compared to median family income, affects the ability of low-income borrowers to purchase homes. Based on the limited opportunities to lend to low-income borrowers, performance is considered excellent. Overall, the bank's market share for home purchase loans in both low- and moderate-income geographies was excellent. The bank's market share to both low- and moderate-income borrowers exceeded the overall market share.

The overall borrower distribution of home refinance loans is very poor. The percentages of loans to low- and moderate-income borrowers were significantly below the percentages of low- and moderate-income families. Overall, the bank's market share for home refinance loans was poor. The bank's market share to low-income borrowers was significantly below the overall market share. The bank's market share to moderate-income borrowers was below the overall market share.

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

Refer to table 11 in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is poor. The percentage of small loans to small businesses (businesses with gross annual revenue of \$1 million or less) was well below the percentage of small businesses. The bank's market share of small loans to small businesses was near the overall market share.

### **Community Development Lending**

Refer to table 1 "Lending Volume" in the state of Florida section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. However, table 5 does not separately list CD loans.

BankUnited's level of CD lending had a positive impact on its overall lending performance in the Miami AA. BankUnited reported 17 loans totaling \$55.5 million to organizations and companies that provide affordable housing to LMI individuals and promote economic development. The total outstanding dollar amount represents 7.21 percent of allocated capital.

Specific examples of CD loans originated during this evaluation period include:

- A \$1 million warehouse line-of-credit to a Florida nonprofit organization to originate mortgage loans to LMI individuals and mortgage loans for properties in LMI geographies within the Miami AA. Loans are funded by the warehouse line-of-credit and then purchased by BankUnited.
- A \$9.75 million term loan to refinance a 198 unit apartment complex in a moderate-income geography with primarily affordable housing units.
- A \$2.82 million refinance loan in the Miami AA for 108 affordable housing units occupied by HUD Section 8 housing assistance recipients. This is part of a larger affordable housing project totaling \$6.13 million, which includes properties in other AAs.

## **Product Innovation and Flexibility**

The bank's innovative and flexible products had a positive impact on Lending Test performance in the Miami AA. In 2013, the bank created the Community Housing Assistance Mortgage Program (CHAMP), which offers financing for low- and moderate- income applicants, or on properties located in LMI geographies (with income restrictions) for up to 80 percent of the property value. For LMI individuals, there is also an option for a second mortgage to finance an additional 17 percent of the property value. Standard origination fees are waived as part of the program. A Florida local Community Development Corporation, which builds and rehabs homes almost exclusively for low-income borrowers, has built or rehabbed 15 homes in two years with financing to end buyers through CHAMP loans. The bank originated six CHAMP loans, aggregating to \$553,000, in the Miami AA. Since this product was launched in 2014, an additional 12 CHAMP loans were originated in limited scope AAs in Florida, aggregating to \$1.05 million.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Cape Coral AA, Ft. Lauderdale AA, Naples AA, North Port AA, Port St. Lucie AA, and West Palm Beach AA was not inconsistent with the bank's overall "High Satisfactory" performance under the Lending Test in Florida. In the Orlando AA and Tampa AA, the bank's performance was stronger than the bank's overall performance in the state. In the Orlando AA, the geographic distribution was good, lending activity was excellent, and CD lending had a significantly positive impact on our assessment of lending performance in the AA. In the Tampa AA, the geographic and borrower distributions were good, lending activity was excellent, and CD lending had a significantly positive impact on our assessment of lending performance. In the Punta Gorda AA and Sebastian AA, the bank's performance was weaker than the bank's overall performance in the state. In the Punta Gorda AA, the geographic distribution was adequate, and CD lending had a neutral impact. In the Sebastian AA, the geographic distribution was adequate, lending activity was excellent, and CD lending had a neutral impact. The stronger and weaker performances in the limited scope AAs did not impact the overall Lending Test rating in the state.

Refer to tables 1 through 6 and 8 through 11 in the state of Florida section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test in Florida is rated Outstanding. Based on full-scope review, the bank's performance in the Miami AA is excellent.

Refer to table 14 in the state of Florida section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, BankUnited made 55 investments and grants in the Miami AA, totaling \$47.8 million; this represents 6.21 percent of allocated tier 1 capital for the AA. Considering the large number of competitors in the market, including some of the largest banks in the country, and a highly

competitive market for qualified investments, the dollar amount of the bank's investments represents an excellent level of investments.

The bank's responsiveness to the CD needs of the AA is good. Community contacts identified affordable housing as a critical need in the AA because of the high median cost of housing and the high age of the housing stock in LMI areas. In terms of total dollar volume, 91.61 percent of the bank's investments were comprised of government sponsored mortgage-backed securities, which were responsive to identified affordable housing needs in the AA. The following are examples of these investments:

- BankUnited invested \$43.79 million in government sponsored, mortgage-backed securities where the underlying mortgages were originated to LMI borrowers in the Miami AA.
- BankUnited made 47 grants and donations totaling \$340,500 during the evaluation period. The investments went to organizations that supported affordable housing initiatives, economic development, revitalization/stabilization and community services targeted toward LMI individuals and geographies. Additionally, the bank made \$3.67 million in Step Up For Student grants, which is an organization that funds Florida tax credit scholarships for low-income families.

### ***Investments – Florida Statewide***

In addition to the CD investments that directly benefit the bank's AA, BankUnited invested \$89,000 with 12 grants and donations to organizations that supported affordable housing initiatives and economic development in the broader statewide area of Florida that includes the bank's AAs. These organizations have a purpose/mandate/function to serve one or more of the bank's AAs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Cape Coral AA, Ft. Lauderdale AA, Orlando AA, Port St. Lucie AA, Sebastian AA, Tampa AA and West Palm Beach AA was not inconsistent with the bank's overall performance in the state. In the Naples AA, North Port AA, and Punta Gorda AA, the bank's performance is weaker than the bank's overall performance in the state due to the volume of qualified investments made during the evaluation period. Performance in the limited-scope AAs did not impact the overall Investment Test Rating. Refer to table 14 in the state of Florida section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the Service Test in Florida is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Miami AA is good.

### **Retail Banking Services**

Refer to table 15 in the state of Florida section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

BankUnited's branch distribution in the AA is adequate after consideration is given for branches that are located in middle- or upper-income geographies, but near low- or moderate-income census tracts. Actual distribution of branches was poor. There were no branches located in low-income geographies. There were four branches located in moderate-income census tracts. The percentage of branches in moderate-income census tracts was below the percentage of the population in moderate-income census tracts. The branch distribution in the AA was augmented by two branches located within a half-mile of low-income census tracts and eight branches located within a half-mile of moderate-income census tracts. These near-to branches improved branch distribution in low- and moderate-income geographies to adequate. Our evaluation of the proximity of these branches included consideration of available and affordable public transit systems within the AAs, and the absence of physical barriers, such as water or highways, that might obstruct convenient access to the branch. Overall, branches were reasonably accessible to essentially all geographies and individuals of different income levels in the assessment area.

Branch openings and closings improved the accessibility of the bank's delivery systems to LMI geographies or individuals. During the evaluation period, there were a total of four branch openings, two in moderate-income geographies, one in a middle-income geography, and one in an upper-income geography; and there were three branch closings, one in a middle-income geography, and two in upper-income geographies. The net result was two additional branches in moderate-income geographies, and one less branch in an upper-income geography, as reflected in table 15. These branches were closed due to business decisions or relocations to different locations.

Branch hours and services do not vary in a way that would inconvenience portions of the AA, particularly LMI individuals. Services offered and banking hours are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking; these delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant emphasis on these alternative delivery systems, as the bank's metrics do not determine their effectiveness in helping to meet the credit needs of LMI individuals.

## **Community Development Services**

BankUnited's performance in providing CD services in the AA was excellent. CD services focused on supporting the provision of community services and affordable housing services targeted to LMI individuals. Bank employees participated in a variety of organizations and partnerships, some in leadership roles, that benefited LMI individuals, promoted economic development, and provided affordable housing. The bank employees conducted presentations, taught courses, and provided technical assistance on financial and banking related matters to community groups and LMI individuals. These services exhibited excellent responsiveness to identified needs in the AA.

In the Miami AA, 24 BankUnited employees provided their expertise to 28 different CD organizations for a total of 309.5 hours throughout the evaluation period. This represents an excellent level of activities. Additionally, 14 of those BankUnited employees demonstrated leadership by serving on the Board of Directors, or on committees, for 15 of the organizations, for 237 of the overall volunteer hours.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Ft. Lauderdale AA and West Palm Beach AA is not inconsistent with the bank's overall High Satisfactory performance under the Service Test in Florida. In the Cape Coral AA, Naples AA, North Port AA, Orlando AA, Port St. Lucie AA, Punta Gorda AA, Sebastian AA, and Tampa AA, the bank's performance is weaker than the bank's overall performance in the state, due to branch distribution in the AAs. Performance in the limited-scope AAs did not impact the overall Service Test rating due to the size of the AAs and the range of performance.

Refer to table 15 in the state of Florida section of appendix D for the facts and data that support these conclusions.

## State Rating

### State of New York

<b>CRA Rating for New York:</b>	<b>Outstanding</b>
<b>The Lending Test is rated:</b>	<b>Outstanding</b>
<b>The Investment Test is rated:</b>	<b>Outstanding</b>
<b>The Service Test is rated:</b>	<b>Outstanding</b>

The major factors that support this rating include:

- An excellent level of lending for home mortgage loans and small business loans;
- An overall good geographic distribution of loans; as evidenced by adequate home mortgage geographic distribution and excellent small business geographic distribution;
- An overall adequate borrower income distribution of loans, as evidenced by good home mortgage borrower distribution and adequate small business borrower distribution;
- CD lending was exceptionally strong, which compensated for overall good retail lending performance and had a significantly positive impact on the bank's performance under the Lending Test;
- An excellent level of qualified investments that provided good responsiveness to community needs in the AA;
- A branch distribution that is readily accessible to all portions of geographies and individuals of different income levels in the assessment area; and
- An excellent level of CD services that was responsive to community needs.

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

BankUnited has two AAs within the state of New York. These AAs included the New York-Jersey City-White Plains, NY-NJ MD (New York AA), and the Nassau County-Suffolk County, NY MD (Nassau AA). The New York AA is comprised of Kings and New York Counties, and the Nassau AA is comprised of Suffolk County.

BankUnited provides a full range of loan and deposit products to all AAs. BankUnited has six branches within the state, representing 5.66 percent of the bank's total branch network. There were six branch openings and three branch closings in the state during the evaluation period, including five openings and two closing within the New York AA. BankUnited has four deposit-taking ATMs within the state, three are in the New York AA, and one is in the Nassau AA. As of June 30, 2014, the bank ranked 36<sup>th</sup> in deposits within all AAs in the state of New York, representing a 0.14 percent market share. The five largest competitors represent 74.67 percent of the market share. BankUnited's New York statewide deposits totaled \$1.37 billion, representing 11.18 percent of the bank's total deposits. The New York

AA is the largest AA within the state and accounts for 70.53 percent of deposits in New York and 7.88 percent of the bank's total deposits.

### ***New York AA***

The banking industry is highly competitive in the New York AA and includes branches of national and regional banks, local community banks, credit unions and other nonbank financial institutions. As of June 30, 2014, BankUnited ranked 33<sup>rd</sup> in AA deposits, representing a 0.11 percent market share. The five largest competitors in the AA include JPMorgan Chase Bank, The Bank of New York Mellon, HSBC Bank, Deutsche Bank, and Bank of America, and represent 76.54 percent of the deposit market share in the AA.

Refer to the market profile for the state of New York in appendix C for detailed demographics and other performance context information for the assessment area that received a full-scope review.

### **Scope of Evaluation in New York**

For the state of New York, we completed a full-scope review of the New York AA, and limited-scope review of the Nassau AA. The New York AA received a full-scope review due to the high percentage of deposits in this area (70.53 percent within New York or 7.88 percent bank wide). The New York AA also had the larger volume of total reportable loans at 80.09 percent within New York, or 7.38 percent bank wide. Branch distribution within the state shows the New York AA with 83.33 percent and the Nassau AA with 16.67 percent of branches in New York. The New York AA received the most emphasis on final ratings because this AA had the largest percentage of deposits, loans and branches within the state. Overall, results in New York were based primarily on the results of the full-scope review of the New York AA. Multifamily loans were evaluated in the New York AA. The volume of home improvement loans and small farm loans was insufficient to contribute meaningfully to conclusions and ratings in the state.

Refer to appendix A for more information on the New York AAs, and appendix C for the New York AA market profile, for detailed demographics and other performance context information for AAs that received full-scope reviews.

## **LENDING TEST**

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

The bank's performance under the Lending Test in New York is rated Outstanding. Based on full-scope reviews, the bank's performance in the AA is excellent.

### **Lending Activity**

Refer to table 1 "Lending Volume" and table 1 "Other Products" in the state of New York section of appendix D for the facts and data used to evaluate the bank's lending activity.

Home mortgage lending activity in the New York AA is excellent considering the bank's market share and ranking when compared to the deposit market share, large number of lenders, and strong

competition for all types of loans in the AA. Based upon FDIC Deposit Market Share data as of June 30, 2014, BankUnited achieved a 0.11 percent market share of deposits, ranking 33<sup>rd</sup> among 97 financial institutions in the AA, equivalent to being in the top 34.02 percent of total depository banks. Based upon 2013 Peer Mortgage Data, BankUnited achieved a 0.11 percent market share of home purchase loans, ranking 95<sup>th</sup> among 270 reporting lenders, equivalent to being in the top 35.19 percent of lenders. The bank achieved a 0.10 percent market share of home refinance loans, ranking 94<sup>th</sup> among 329 reporting lenders, equivalent to being in the top 28.57 percent of lenders.

The small business lending activity is excellent given the bank's ranking when compared to the deposit market share and strong small business lending competition within the AA. BankUnited achieved a 0.06 percent market share of small loans to businesses, ranking 30<sup>th</sup> among 167 reporting lenders, equivalent to being in the top 17.96 percent of lenders. The top five lenders for small business lending are national credit card banks that control a majority of the market. Collectively, the top five lenders have 80.48 percent of the market share. Individual market shares of these national credit card banks ranged from 5.06 percent to 44.40 percent.

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

Overall, BankUnited's geographic distribution of loans in the New York AA is good. In performing our analysis, we placed greater emphasis on the bank's small business lending, rather than home mortgage lending. Within home mortgage lending, more emphasis was given to home purchase loans based on volume of originations during the evaluation period.

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

The geographic distribution of home mortgage loans is adequate. As described in the profile of the New York AA, there are several factors affecting mortgage lending in both low- and moderate-income geographies. The levels of owner-occupied housing are low, and rental properties represent the majority of housing units in both low- and moderate-income geographies. As a result, there are fewer lending opportunities in LMI geographies.

Refer to tables 2, 3, 4, and 5 in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

The geographic distribution of home purchase loans is adequate. The percentage of loans in low-income geographies was significantly below the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was below the percentage of owner-occupied units in these geographies. However, based upon the limited volume of owner occupied units in low- and moderate-income geographies, performance is considered adequate. Overall, the bank's market share for home purchase loans was poor. The bank's market share in low-income geographies was below the overall market share, and the bank's market share in moderate-income geographies was significantly below the overall market share.

The geographic distribution of home refinance loans is good. The percentage of loans in low-income geographies exceeded the percentage of owner-occupied units in these geographies. The percentage of loans in moderate-income geographies was near the percentage of owner-occupied units in these geographies. Overall, the bank's market share in both low- and moderate-income geographies was poor for refinance loans. The bank's market share in low-income geographies was significantly below the



overall market share for home refinance loans. The bank's market share in moderate-income geographies was well below the overall market share for home refinance loans.

The overall geographic distribution of multifamily loans is good. The percentage of loans in low-income geographies was well below the percentage owner-occupied units in these geographies. The percentage of loans in moderate-income geographies significantly exceeded the percentage of owner-occupied units in such geographies. Market share data for multifamily loans in the New York AA was not available.

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

Refer to table 6 in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The overall geographic distribution of small loans to businesses is excellent. The percentage of loans in both low- and moderate-income geographies exceeded the percentage of businesses in those geographies. Overall, the bank's market share in both low- and moderate-income geographies was excellent. The bank's market shares in both low- and moderate-income geographies exceeded the overall market share for small business loan.

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

We reviewed summary reports and analyzed BankUnited's home mortgage lending, community development lending, and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

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

The overall distribution of lending by income level of borrower is adequate. As noted previously, we placed greater emphasis on the bank's small business lending, rather than home mortgage lending, as small business loans represented the majority of the bank's reportable lending activity. Within home mortgage lending, more emphasis was given to home purchase loans based on volume of originations during the evaluation period. Additionally, we considered factors that can impact the bank's ability to lend in the AA, including the level of families living below the poverty level, the general affordability of housing to LMI borrowers, and unemployment rates, in our analysis of lending performance in the AA.

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

Refer to tables 8, 9 and 10 in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Overall, the borrower distribution of home mortgage loans is good. In evaluating the borrower distribution of home loans, it is important to note that according to 2010 U.S. Census data, 17.31 percent of families in the AA are below the poverty level. In addition, unemployment in the AA remains higher than the national average at 6.5 percent versus 5.6 percent, respectively, as of December 2014. These factors make lending to LMI individuals challenging. Further, the very high median housing price when compared to median family income significantly affects the ability of low-income borrowers to purchase

homes. If low-income borrowers are unable to purchase homes, they then would not need refinance loans.

The overall borrower distribution of home purchase loans is good. The percentage of home purchase loans to low-income borrowers was significantly below the percentage of low-income families. The percentage of loans to moderate-income borrowers approximates the percentage of moderate-income families. Based on the limited opportunities to lend to low-income borrowers, performance is considered good. Overall, the bank's market share for home purchase loans was good. The bank's market share to low-income borrowers was significantly below the overall market share. The bank's market share to moderate-income borrowers exceeded the overall market share.

The overall borrower distribution of home refinance loans is excellent. The percentage of refinance loans to low-income borrowers was below the percentage of low-income families. The percentage of loans to moderate-income borrowers significantly exceeded the percentage of moderate-income families. Based on the limited opportunities to lend to low-income borrowers, performance is considered excellent. Overall, the bank's market share for home refinance loans was good. The bank did not achieve a market share to low-income borrowers. The bank's market share to moderate-income borrowers exceeded the overall market share.

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

Refer to table 11 in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The overall borrower distribution of small loans to businesses is adequate. The percentage of small loans to businesses (businesses with gross annual revenue of \$1.00 million or less) was near the percentage of small businesses in the AA. The bank's market share of small loans to businesses was significantly below the overall market share.

### **Community Development Lending**

Refer to table 1, "Lending Volume" in the state of New York section of appendix D for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

BankUnited's level of CD lending was exceptionally strong and had a significantly positive impact on its overall lending performance in the New York AA. This performance compensated for overall good retail lending performance. BankUnited reported 19 loans totaling \$174.61 million to organizations and companies that provide community services targeted to LMI individuals, and support affordable housing activities in the AA. The total outstanding dollar amount represents 135.32 percent of allocated capital.

Specific examples of CD loans originated during this evaluation period include:

- A \$1.1 million term loan to a non-profit health and wellness organization that focuses on care for underserved low-income individuals and homeless.

- A \$1 million warehouse line-of-credit to a NY nonprofit organization to originate mortgage loans to LMI individuals and mortgage loans for properties in LMI geographies. Loans are funded by the warehouse line-of-credit and then purchased by BankUnited.
- 17 loans aggregating to \$172.51 million for multifamily properties located in LMI geographies within the New York AA. These multifamily properties were comprised primarily of affordable housing units, and were originated as Consolidated Extension and Modification Agreements (CEMA) loans.

### **Product Innovation and Flexibility**

The bank's innovative and flexible products had a positive impact on Lending Test performance in the New York AA. In 2014, the bank created the Community Housing Assistance Mortgage Program (CHAMP), which offers financing for low- and moderate- income applicants, or on properties located in LMI geographies (with income restrictions) for up to 80 percent of the property value. For LMI individuals, there is also an option for a second mortgage to finance an additional 17 percent of the property value. Standard origination fees are waived as part of the program. The bank made two CHAMP loans for an aggregate amount of \$494,000 in the New York AA since this product was launched in 2014.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Lending Test in the Nassau AA is not inconsistent with the bank's overall Outstanding performance under the Lending Test in New York. Refer to tables 1 through 6 and 8 through 11 in the state of New York section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in New York is rated Outstanding. Based on full-scope reviews, the bank's performance in the New York AA is excellent.

Refer to table 14 in the state of New York section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, BankUnited made 28 investments in the New York AA totaling \$13.29 million; this represents 10.3 percent of allocated tier 1 capital for the AA. The dollar amount of the bank's investment represents an excellent level of investments.

The bank's responsiveness to the CD needs of the AA is good. In terms of total dollar volume, 98.54 percent of the bank's investments were comprised of government sponsored mortgage-backed securities, which were responsive to identified affordable housing needs in the AA. The following are examples of investments:

- BankUnited invested \$13.10 million in a government sponsored mortgage-backed security where the underlying mortgages were originated to LMI borrowers in the New York AA.

- BankUnited made 27 grants and donations totaling \$194,000 to organizations that supported affordable housing initiatives, economic development, and community services targeted toward LMI individuals and geographies during the evaluation period.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Nassau AA is not inconsistent with the bank's overall performance in the state.

Refer to the table 14 in the state of New York section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in New York is rated Outstanding. Based on full-scope reviews, the bank's performance in the New York AA is excellent.

### **Retail Banking Services**

Refer to table 15 in the state of New York section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

BankUnited's branch distribution in the AA is excellent when considering the bank's limited presence in the AA and branches located in middle- or upper-income geographies, but near moderate-income census tracts. Two of the bank's five branches in the AA are located in low- and moderate-income geographies. There was one branch located in a low-income geography. The percentage of branches in low-income geographies exceeds the percentage of the population in low-income geographies. There was one branch located in a moderate-income geography. The percentage of branches in moderate-income census tracts was below the percentage of the population in moderate-income census tracts. Additionally, there were two branches located in middle- or upper-income geographies that were within one-half mile of moderate-income census tracts. This improved branch distribution in moderate-income geographies to excellent. Our evaluation of the proximity of these branches included consideration of available and affordable public transit systems within the AAs, and the absence of physical barriers, such as water or highways, that might obstruct convenient access to the branch. Overall branches were readily accessible to all portions of geographies and individuals of different income levels in the assessment area.

Branch openings and closings have not adversely affected the accessibility of the bank's delivery systems to LMI geographies or individuals. During the evaluation period, there were a total of five branch openings, one in a low-income geography, one in a moderate-income geography, and three in upper-income geographies; and there were two branch closings, one in a low-income geography, and one in moderate-income geography. The net result was three additional branches in upper-income geographies, as reflected in table 15. The branch closures were originally due to business decisions; the branch in the low-income geography was closed in June 2012 and re-opened in December 2013, and the branch in the moderate-income geography was closed in March 2013 and re-opened in August 2013.

Branch hours and services do not vary in a way that would inconvenience portions of the AA, particularly LMI individuals. Services offered and banking hours are comparable among locations regardless of the income level of the geography.

Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, mobile banking, ATMs, and telephone banking; these delivery methods provide increased access to banking services throughout all areas in the AA. We did not place significant emphasis on these alternative delivery systems, as the bank's metrics do not determine their effectiveness in helping to meet the credit needs of LMI individuals.

### **Community Development Services**

BankUnited's performance in providing CD services in the AA was excellent. CD services focused on supporting the provision of community services and affordable housing services targeted to LMI individuals. Bank employees participated in a variety of organizations and partnerships, some in leadership roles, that benefited LMI individuals, promoted economic development, and provided affordable housing. The bank employees conducted presentations on financial literacy and banking related matters to LMI individuals. These services exhibited excellent responsiveness to identified needs in the AA.

In the New York AA, 15 BankUnited employees provided their expertise to eight different CD organizations for a total of 268 hours throughout the evaluation period. This represents an excellent level of activities. Additionally, three of those BankUnited employees demonstrated leadership by serving on the Board of Directors, or on committees, for six of the organizations, for 190 of the overall volunteer hours.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Service Test in the Nassau AA is weaker than the bank's overall performance in the state. The branch distribution in the AA is very poor, with the bank's services inaccessible to significant portions of geographies and individuals of different income levels in the assessment area.

Refer to table 15 in the state of New York section of appendix D for the facts and data that support these conclusions.

## Appendix A: Scope of Evaluation

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 1/12/12 to 12/31/14 Investment and Service Tests and CD Loans: 10/9/12 to 12/31/14	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
BankUnited N.A. (BankUnited) Miami Lakes, FL	Home Purchase, Home Refinance, Multifamily, Small Business, Community Development loans, Qualified Investments, Community Development Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
NA		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
<u>Florida</u> Miami-Miami Beach-Kendall FL MD (Miami AA) Cape Coral-Fort Myers, FL MSA (Cape Coral AA) Ft Lauderdale-Pompano Beach-Deerfield Beach FL, MD (Ft Lauderdale AA) Naples-Immokalee-Marco Island FL MSA (Naples AA) North Port-Sarasota-Bradenton, FL MSA (North Port AA) Orlando-Kissimmee-Sanford FL MSA (Orlando AA) Port St. Lucie FL MSA (Port St. Lucie AA) Punta Gorda FL MSA (Punta Gorda AA) Sebastian-Vero Beach FL MSA (Sebastian AA) Tampa-St. Petersburg-Clearwater, FL MSA (Tampa AA) West Palm Beach-Boca Raton-Delray Beach FL MSA (West Palm Beach AA)	Full-Scope  Limited-Scope  Limited-Scope  Limited-Scope  Limited-Scope  Limited-Scope  Limited-Scope  Limited-Scope  Limited-Scope  Limited-Scope	Miami-Dade County  Lee County  Broward County  Collier County  Manatee and Sarasota Counties  Orange and Seminole Counties  Martin and St. Lucie Counties  Charlotte County  Indian River County  Hillsborough and Pinellas Counties  Palm Beach County
<u>New York</u> New York-Jersey City-White Plains NY-NJ MD (New York AA) Nassau County-Suffolk County NY MD (Nassau AA)	Full-Scope  Limited-Scope	Kings and New York Counties  Suffolk County

# Appendix B: Summary of Multistate Metropolitan Area and State Ratings

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RATINGS BankUnited, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
BankUnited	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State:				
Florida	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
New York	Outstanding	Outstanding	Outstanding	Outstanding

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## Appendix C: Market Profiles for Full-Scope Areas

### State of Florida

#### Miami AA

Demographic Information for Full Scope Area: Miami AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	518	5.98	25.48	32.05	33.20	3.28
Population by Geography	2,496,435	5.06	26.89	34.46	33.01	0.58
Owner-Occupied Housing by Geography	480,532	1.67	19.87	35.55	42.90	0.01
Business by Geography	430,864	3.10	22.28	27.62	45.47	1.53
Farms by Geography	5,051	1.98	19.38	32.05	46.05	0.53
Family Distribution by Income Level	571,889	23.23	17.00	18.29	41.48	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	230,063	9.03	39.65	33.96	17.33	0.03
Median Family Income		50,065	Median Housing Value	295,738		
FFIEC Adjusted Median Family Income for 2014		48,400	Unemployment Rate	4.18%		
Households Below Poverty Level		18%	(2010 US Census)			

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2014 FFIEC updated MFI

The Miami AA includes all of the Miami-Miami Beach-Kendall, FL MD. The AA is located in southeastern Florida, and includes the entire county of Miami Dade with 518 census tracts. The AA meets the requirements of the regulation, and does not arbitrarily exclude LMI geographies.

According to the 2010 U.S. Census data, the total population of the AA was 2.5 million. The distribution of families by income level was 23.23 percent low-income, 17 percent moderate-income, 18.29 percent middle-income and 41.48 percent upper-income. While 5.98 percent of census tracts were low-income, 25.48 percent of census tracts were moderate-income, 32.05 percent of census tracts were middle-income, and 33.20 percent of census tracts were upper-income. The 2014 FFIEC Adjusted Median Family Income for the AA was \$48,400, and 13.76 percent of families were living below the poverty level.

The bank offers a full range of commercial and consumer loan/deposit products and services. Strong competition exists for financial services within the Miami AA. Per the June 30, 2014 FDIC Deposit Market Share Report, the bank ranks sixth out of 68 depository financial institutions in the AA with a 5.63 percent market share. The competition is comprised primarily of large nationwide institutions and regional banks. The top five competitors, in order of their ranking, are Wells Fargo Bank, Bank of America, Citibank, JPMorgan Chase Bank and SunTrust Bank. These competitors control 48.41 percent of the deposit share, and maintain 276 of the 695 offices in the AA.

BankUnited has 26 full-service branches in the AA as of the end of the evaluation period. The bank supplements its branch network with 20 deposit-taking ATMs. The bank's deposits in the Miami AA totaled \$5.76 billion, representing 52.95 percent of total BankUnited deposits in the state of Florida.



## *Employment and Economic Factors*

According to the U.S. Bureau of Labor Statistics ([www.BLS.gov](http://www.BLS.gov)), the unemployment rate in Miami Dade County improved during the evaluation period. Unemployment decreased from 8.2 percent in January 2012 to 5.9 percent in December 2014. The unemployment rate of the AA at the end of the evaluation period was slightly higher than the national unemployment rate (5.6 percent) and the statewide unemployment rate (5.7 percent). Although the area is recovering, low-income jobs are leading the job growth, keeping the economy from getting fully back on track. Low paying positions in hospitality and retail make up less than one-fifth of all jobs in the area, but account for one-third of the total created jobs over the last year. Total payroll employment is at an all-time high; however, household employment remains below the prerecession peak suggesting more workers have multiple part-time jobs and are being double-counted in the payroll survey.

A significant portion of the AA's workforce is employed by local government (101,137 employees), and federal government (19,533 employees). Other predominate industries include restaurants, medical, legal, and transportation and accommodations. In addition to local and federal government, the largest employers in the AA are Baptist Health Systems of Southern Florida (14,627 employees), University of Miami (13,428 employees), Publix Super Markets (12,000 employees), followed by Jackson Health System (10,010 employees), and American Airlines (9,939 employees). These employers have a combined total of 60,004 employees.

The percentage of families in the AA living below the poverty level is moderate at 13.76 percent. A majority of families living below the poverty level live in LMI geographies; 12.96 percent live in low-income census tracts and 41.04 percent live in moderate-income census tracts. A significant proportion of families in LMI geographies are living below the poverty level. The families living below the poverty level represent 38.06 percent of families in low-income census tracts and 21.22 percent of families in moderate-income census tracts. LMI geographies account for 31.46 percent of the census tracts in the AA based on the 2010 U.S. Census.

## *Housing*

The median housing price in the AA is high. According to the 2010 U.S. Census, the weighted average median value for housing in the AA was \$295,740. Housing prices in Miami have risen since the low point in the first quarter of 2011, with prices in the poorest zip codes rising more quickly during that time than prices in the wealthiest areas. The high price of housing makes it difficult for low- and moderate-income individuals to own a home in the assessment area without the help of loan subsidies. Additionally, high property taxes and insurance premiums add significant cost to owning a home, which increases barriers to homeownership for the lower income families. In low- and moderate-income geographies, the level of renter occupancy is high (70 percent and 51 percent, respectively), based on 2010 Census data. Rental costs are also high. The weighted average monthly rental cost is \$1,042. The high price for owner-occupied and rental housing resulted in a significant portion of the population paying greater than 30 percent of their income for a home mortgage or rent.

There are several factors affecting the ability of financial institutions to make mortgage loans in the AA. The levels of owner-occupied housing units in both low- and moderate-income geographies are very low, with the majority of housing units in those areas being rental properties. According to the 2010 U.S. Census, 49 percent of the total housing units in the AA were owner-occupied, while 35.39 percent were rental units. Rental properties represent the largest percentage of housing units in both low- and

moderate-income geographies. Rental units represent 70.26 percent and 50.75 percent of the housing units in low- and moderate-income geographies, respectively. Owner-occupied units are 14.34 percent of housing units in low-income geographies and 36.86 percent of housing units in moderate-income geographies.

Additionally, the median age of the housing stock in LMI areas affects the ability of financial institutions to make mortgage loans. The median ages of the housing stock in both LMI geographies are higher than the median ages in middle- and upper-income geographies. According to the 2010 U.S. Census, the median age of housing stock was 48 years in low-income geographies and 42 years in moderate-income geographies. The older housing stock contributes to lower median housing values in LMI geographies and can affect the ability of home owners to refinance mortgages because of reduced equity values in their homes. Older housing stock also typically has a lower purchase price, but often cost more to maintain.

### *Community Contact*

We considered information from three community contacts, two nonprofits and one community development financial institution within the Miami AA. The contacts identified support for affordable housing, both owner-occupied and rental, as a critical need within the area. This support includes additional access to capital for developers of affordable housing. Other needs identified by our contacts include micro lending for consumers, small business lending, branches in LMI communities, and technical support for non-profits.

The contacts also described banking competition as being intense. In addition to community and midsize banks, branches of the largest banks in the country operate in Miami-Dade County. The competition between financial institutions is not only for retail and commercial deposits and loans, but also for community development loans and investments.

## State of New York

### New York AA

Demographic Information for Full Scope Area: New York AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,049	16.11	33.94	22.69	24.88	2.38
Population by Geography	4,090,573	19.16	35.33	17.48	27.92	0.11
Owner-Occupied Housing by Geography	441,234	5.95	24.27	23.97	45.80	0.00
Business by Geography	419,329	9.67	20.53	13.61	51.50	4.70
Farms by Geography	1,433	6.77	20.03	15.63	54.78	2.79
Family Distribution by Income Level	881,492	33.13	16.48	14.79	35.60	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	437,343	30.80	45.14	15.28	8.78	0.00
Median Family Income		68,006	Median Housing Value	619,324		
FFIEC Adjusted Median Family Income for 2014		68,900	Unemployment Rate	4.22%		
Households Below Poverty Level		19%	(2010 US Census)			

(\*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2010 US Census and 2014 FFIEC updated MFI

The bank entered the New York AA through the Herald National Bank acquisition on February 29, 2012. The New York AA includes two of the eight counties within the New York-Jersey City-White Plains, NY-NJ MD. The AA includes all of Kings County and New York County with 1049 census tracts. Kings County is comprised of Brooklyn and New York County is comprised of Manhattan (two of the five New York City boroughs). The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies.

According to the 2010 U.S. Census, the total population of the AA was 24.09 million. The distribution of families by income level was 33.13 percent low-income, 16.48 percent moderate-income, 14.79 percent middle-income and 35.60 percent upper-income. While 16.11 percent of census tracts were low-income, 33.94 percent of census tracts were moderate-income, 22.69 percent of census tracts were middle-income, and 24.88 percent of census tracts were upper-income. The 2014 FFIEC Adjusted Median Family Income for the AA was \$68,900, and 17.31 percent of families were living below the poverty level.

The bank offers a full range of commercial and consumer loan/deposit products and services. Strong competition exists for financial services within the New York AA. Per the June 30, 2014 FDIC Deposit Market Share Report, the bank ranks 33<sup>rd</sup> out of 97 depository financial institutions in the AA, with a 0.11 percent market share. The competition is comprised primarily of large nationwide institutions and regional banks. The top five competitors, in order of their ranking, are JPMorgan Chase Bank, The Bank of New York Mellon, HSBC Bank, Deutch Bank Trust Company, and Bank of America.

These competitors control 76.54 percent of the deposit share, and maintain 394 of the 1068 offices in the AA. BankUnited has five full-service branches in the AA as of the end of the evaluation period. The bank supplements its branch network with three deposit-taking ATMs. The bank's deposits in the New York AA totaled \$965.53 million, representing 70.53 percent of total BankUnited deposits in the state of New York.

## *Employment and Economic Factors*

According to the U.S. Bureau of Labor Statistics ([www.BLS.gov](http://www.BLS.gov)), the unemployment rate in Kings County improved during the evaluation period; it decreased from 10.4 percent in January 2012 to 6.5 percent in December 2014. The unemployment rate of the AA at the end of the evaluation period was the same as the statewide unemployment rate (6.5 percent) and higher than the national unemployment rate (5.6 percent). The unemployment rate in New York County also improved during the evaluation period; it decreased from 8.4 percent in January 2012 to 4.2 percent in December 2014. The unemployment rate of the AA at the end of the evaluation period was lower than both the statewide unemployment rate (6.5 percent) and the national unemployment rate (5.6 percent).

A significant portion of the New York-Jersey City-White Plains, NY-NJ MD workforce is employed by local government (718,199 employees), state government (97,203 employees), and federal government (74,910 employees). Other predominate industries include restaurants, medical, family services, and employment services. In addition to government, the largest employers in the AA are North Shore Long Island Jewish Health System (48,650 employees), JPMorgan Chase (37,363 employees), Mount Sinai Medical Center (32,056 employees), Macy's (31,200 employees), Citibank (24,991 employees) and New York Presbyterian Healthcare System (21,802 employees); combined, they employ 196,062 employees.

The percentage of families in the AA living below the poverty level is high at 17.31 percent. A majority of families living below the poverty level live in LMI geographies. Of those living in LMI geographies, 41.20 percent live in low-income census tracts and 41.81 percent live in moderate-income census tracts. A significant portion of families in LMI geographies are living below the poverty level. The families living below the poverty level represent 35.8 percent of families in low-income census tracts and 19.83 percent of families in moderate-income census tracts. LMI geographies account for 50.05 percent of the census tracts in the AA based on the 2010 U.S. Census.

## *Housing*

There are several factors affecting the ability of financial institutions to make mortgage loans in the AA. The levels of owner-occupied housing units in both low- and moderate-income geographies are very low, with the majority of housing units in those areas being rental properties. Additionally, the median age of the housing stock is higher in those areas than in middle- and upper-income areas, contributing to lower median housing values in the LMI areas and reduced equity for refinancing mortgage loans. A moderate level of unemployment and a high poverty rate in the AA are additional factors that can affect the ability of financial institutions to make mortgage loans in the AA.

According to the 2010 U.S. Census, 24.17 percent of the total housing units in the AA were owner-occupied, while 65.46 percent were rental units. Rental properties represent the largest percentage of housing units in both low- and moderate-income geographies. Rental units represent 83.06 percent and 72.54 percent of the housing units in low- and moderate-income geographies, respectively. Owner-occupied units are 9.14 percent of housing units in low-income geographies and 18.46 percent of housing units in moderate-income geographies.

The median ages of the housing stock in both LMI geographies are higher than the median ages in middle- and upper-income geographies. According to the 2010 U.S. Census, the median age of housing stock was 60 years in low-income geographies and 65 years in moderate-income geographies. The older

housing stock contributes to lower median housing values in LMI geographies, and can affect the ability of home owners to refinance mortgages because of reduced equity values in their homes. Older housing stock also typically has a lower purchase price, but often cost more to maintain.

The median housing price in the AA is high, especially compared to median family incomes. According to the 2010 U.S. Census, the weighted average median value for housing in the AA was \$619,320. With median family income of \$68,900 in the AA, it can be challenging for low- and moderate-income borrowers to purchase a home. Other factors limiting the number of potential borrowers for financial institutions in the AA are the moderate unemployment rate and the high poverty rate.

### *Community Contact*

We considered information from three community contacts, two nonprofits and one community service organization, within the New York AA. The primary community needs were the development of affordable housing for both owner-occupied and rental units, financial literacy, and social services for LMI individuals.

# Appendix D: Tables of Performance Data

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## Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in core tables 2 through 7 and part of table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in core tables 8 through 12 and part of table 13. Deposit data are compiled by the FDIC and are available as of June 30 of each year. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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

**Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

**Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.

**Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

**Table 3. Geographic Distribution of Home Improvement Loans** - See table 2.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See table 2.

**Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

**Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

**Table 9. Borrower Distribution of Home Improvement Loans** - See table 8.

**Table 10. Borrower Distribution of Refinance Loans** - See table 8.

**Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

**Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.



## **Tables of Performance Data**

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Tables provided cover the bank's lending performance from January 1, 2012 through December 31, 2014 and investment performance from October 9, 2012 through December 31, 2014.

**State of Florida**

**State of New York**

**Table 1. Lending Volume**

LENDING VOLUME		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
Assessment Area (2014):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Miami AA	33.36	392	178,501	1,029	232,020	0	0	17	55,495	1,421	410,521	52.95
<b>Limited Review:</b>												
Cape Coral AA	2.89	48	9,128	75	10,174	0	0	0	0	123	19,302	2.31
Ft Lauderdale AA	27.21	269	131,014	890	198,488	0	0	4	36,185	1,159	329,502	15.57
Naples AA	2.58	35	32,330	75	10,736	0	0	1	10,110	110	43,066	1.88
North Port AA	3.62	49	12,260	105	22,988	0	0	1	3,000	154	35,248	3.22
Orlando AA	2.98	46	27,662	81	26,506	0	0	2	6,000	127	54,168	1.00
Port St Lucie AA	2.96	49	10,149	77	13,315	0	0	1	150	126	23,464	3.41
Punta Gorda AA	0.59	4	447	21	2,248	0	0	0	0	25	2,695	1.21
Sebastian AA	1.50	30	5,353	34	4,726	0	0	0	0	64	10,079	1.50
Tampa AA	5.96	87	42,878	167	38,346	0	0	2	20,300	254	81,224	4.23
West Palm Beach AA	16.34	160	70,365	536	118,010	0	0	5	9,573	696	188,375	12.72

\* Loan Data as of December 31, 2014. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 9, 2012 to December 31, 2014.

\*\*\* Deposit Data as of September 24, 2015. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Miami AA	216	31.35	1.67	5.09	19.87	25.46	35.56	29.63	42.90	39.81	0.28	0.63	0.95	0.19	0.19	
<b>Limited Review:</b>																
Cape Coral AA	35	5.08	1.32	0.00	14.17	20.00	55.62	34.29	28.89	45.71	0.15	0.00	0.22	0.13	0.15	
Ft Lauderdale AA	155	22.50	1.73	0.65	27.32	29.03	37.11	30.97	33.84	39.35	0.26	0.00	0.50	0.18	0.24	
Naples AA	19	2.76	2.40	5.26	16.42	15.79	46.03	36.84	35.15	42.11	0.07	0.00	0.00	0.03	0.16	
North Port AA	27	3.92	1.26	0.00	20.07	40.74	48.99	44.44	29.68	14.81	0.13	0.00	0.40	0.15	0.04	
Orlando AA	23	3.34	0.39	0.00	16.76	4.35	36.45	21.74	46.40	73.91	0.04	0.00	0.00	0.04	0.05	
Port St Lucie AA	33	4.79	1.02	0.00	14.71	15.15	57.46	60.61	26.81	24.24	0.28	0.00	0.23	0.31	0.25	
Punta Gorda AA	3	0.44	0.00	0.00	6.26	0.00	76.48	66.67	17.26	33.33	0.00	0.00	0.00	0.00	0.00	
Sebastian AA	22	3.19	1.08	0.00	11.88	9.09	58.73	77.27	28.31	13.64	0.77	0.00	0.47	1.14	0.15	
Tampa AA	59	8.56	2.10	1.69	17.84	33.90	43.16	38.98	36.91	25.42	0.13	0.00	0.41	0.17	0.03	
West Palm Beach AA	97	14.08	2.96	8.25	22.08	25.77	36.12	12.37	38.83	53.61	0.16	0.85	0.41	0.03	0.17	

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Miami AA	4	57.14	1.67	0.00	19.87	0.00	35.56	25.00	42.90	75.00	0.19	0.00	0.00	0.32	0.18	
<b>Limited Review:</b>																
Cape Coral AA	0	0.00	1.32	0.00	14.17	0.00	55.62	0.00	28.89	0.00	0.00	0.00	0.00	0.00	0.00	
Ft Lauderdale AA	2	28.57	1.73	0.00	27.32	50.00	37.11	0.00	33.84	50.00	0.10	0.00	0.53	0.00	0.00	
Naples AA	0	0.00	2.40	0.00	16.42	0.00	46.03	0.00	35.15	0.00	0.00	0.00	0.00	0.00	0.00	
North Port AA	0	0.00	1.26	0.00	20.07	0.00	48.99	0.00	29.68	0.00	0.00	0.00	0.00	0.00	0.00	
Orlando AA	1	14.29	0.39	0.00	16.76	0.00	36.45	0.00	46.40	100.00	0.00	0.00	0.00	0.00	0.00	
Port St Lucie AA	0	0.00	1.02	0.00	14.71	0.00	57.46	0.00	26.81	0.00	0.00	0.00	0.00	0.00	0.00	
Punta Gorda AA	0	0.00	0.00	0.00	6.26	0.00	76.48	0.00	17.26	0.00	0.00	0.00	0.00	0.00	0.00	
Sebastian AA	0	0.00	1.08	0.00	11.88	0.00	58.73	0.00	28.31	0.00	0.00	0.00	0.00	0.00	0.00	
Tampa AA	0	0.00	2.10	0.00	17.84	0.00	43.16	0.00	36.91	0.00	0.00	0.00	0.00	0.00	0.00	
West Palm Beach AA	0	0.00	2.96	0.00	22.08	0.00	36.12	0.00	38.83	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Miami AA	160	35.87	1.67	0.00	19.87	4.38	35.56	16.25	42.90	79.38	0.22	0.00	0.03	0.11	0.32	
<b>Limited Review:</b>																
Cape Coral AA	13	2.91	1.32	0.00	14.17	15.38	55.62	46.15	28.89	38.46	0.02	0.00	0.17	0.02	0.00	
Ft Lauderdale AA	105	23.54	1.73	0.95	27.32	8.57	37.11	20.95	33.84	69.52	0.13	0.39	0.08	0.10	0.16	
Naples AA	14	3.14	2.40	7.14	16.42	14.29	46.03	35.71	35.15	42.86	0.10	1.47	0.23	0.03	0.12	
North Port AA	22	4.93	1.26	0.00	20.07	4.55	48.99	31.82	29.68	63.64	0.06	0.00	0.00	0.02	0.13	
Orlando AA	21	4.71	0.39	0.00	16.76	9.52	36.45	4.76	46.40	85.71	0.05	0.00	0.06	0.01	0.07	
Port St Lucie AA	16	3.59	1.02	0.00	14.71	18.75	57.46	25.00	26.81	56.25	0.11	0.00	0.38	0.09	0.09	
Punta Gorda AA	1	0.22	0.00	0.00	6.26	0.00	76.48	0.00	17.26	100.00	0.03	0.00	0.00	0.00	0.15	
Sebastian AA	8	1.79	1.08	0.00	11.88	25.00	58.73	37.50	28.31	37.50	0.16	0.00	1.09	0.07	0.12	
Tampa AA	26	5.83	2.10	0.00	17.84	23.08	43.16	30.77	36.91	46.15	0.04	0.00	0.11	0.04	0.03	
West Palm Beach AA	60	13.45	2.96	0.00	22.08	10.00	36.12	26.67	38.83	63.33	0.12	0.00	0.20	0.07	0.13	

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Miami AA	12	44.44	8.41	0.00	28.73	91.67	32.26	8.33	30.60	0.00	1.07	0.00	2.27	0.00	0.00	
<b>Limited Review:</b>																
Cape Coral AA	0	0.00	7.80	0.00	15.02	0.00	39.74	0.00	37.44	0.00	0.00	0.00	0.00	0.00	0.00	
Ft Lauderdale AA	7	25.93	4.53	14.29	36.14	57.14	41.64	14.29	17.69	14.29	1.96	0.00	5.13	1.69	0.00	
Naples AA	2	7.41	3.02	0.00	13.85	50.00	39.45	50.00	43.68	0.00	5.88	0.00	14.29	0.00	0.00	
North Port AA	0	0.00	2.20	0.00	18.61	0.00	38.67	0.00	40.52	0.00	0.00	0.00	0.00	0.00	0.00	
Orlando AA	1	3.70	2.05	0.00	40.91	100.00	38.98	0.00	18.07	0.00	0.00	0.00	0.00	0.00	0.00	
Port St Lucie AA	0	0.00	1.24	0.00	19.26	0.00	41.19	0.00	38.31	0.00	0.00	0.00	0.00	0.00	0.00	
Punta Gorda AA	0	0.00	0.00	0.00	10.92	0.00	69.38	0.00	19.69	0.00	0.00	0.00	0.00	0.00	0.00	
Sebastian AA	0	0.00	5.15	0.00	12.59	0.00	44.81	0.00	37.45	0.00	0.00	0.00	0.00	0.00	0.00	
Tampa AA	2	7.41	4.24	0.00	27.35	50.00	37.13	0.00	31.27	50.00	1.27	0.00	2.78	0.00	2.00	
West Palm Beach AA	3	11.11	6.39	33.33	31.55	66.67	33.58	0.00	28.47	0.00	2.33	0.00	6.25	0.00	0.00	

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of MultiFamily Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans					
<b>Full Review:</b>															
Miami AA	998	32.66	3.10	3.21	22.28	26.15	27.62	21.34	45.47	49.30	0.54	1.11	0.61	0.55	0.47
<b>Limited Review:</b>															
Cape Coral AA	75	2.45	3.67	4.00	14.57	14.67	51.68	61.33	30.02	20.00	0.19	0.00	0.21	0.17	0.23
Ft Lauderdale AA	890	29.12	3.36	7.08	24.59	27.75	33.82	32.58	38.22	32.58	0.77	1.49	1.15	0.69	0.57
Naples AA	75	2.45	2.55	0.00	13.47	9.33	42.17	57.33	41.81	33.33	0.35	0.00	0.23	0.48	0.28
North Port AA	105	3.44	1.62	0.00	20.18	24.76	43.24	40.95	34.95	34.29	0.36	0.00	0.43	0.50	0.21
Orlando AA	81	2.65	0.63	3.70	21.17	35.80	33.84	27.16	44.35	33.33	0.11	0.00	0.23	0.06	0.10
Port St Lucie AA	77	2.52	1.84	2.60	18.24	35.06	53.24	44.16	26.58	18.18	0.28	0.00	0.15	0.41	0.18
Punta Gorda AA	21	0.69	0.00	0.00	6.80	4.76	78.33	90.48	14.87	4.76	0.11	0.00	0.57	0.10	0.00
Sebastian AA	34	1.11	3.80	8.82	8.84	5.88	57.13	50.00	30.03	35.29	0.35	0.00	0.00	0.46	0.34
Tampa AA	167	5.46	3.04	1.80	18.86	23.95	38.67	37.72	39.25	36.53	0.14	0.08	0.19	0.14	0.13
West Palm Beach AA	533	17.44	3.49	4.88	18.91	19.51	31.53	33.58	45.89	42.03	0.63	0.89	0.59	0.84	0.49

\* Based on 2012 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2013).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA					Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					Market Share <sup>†</sup>				
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>1</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Miami AA	216	31.35	23.23	8.13	17.00	28.75	18.29	14.37	41.48	48.75	0.33	1.90	0.96	0.29	0.18	
<b>Limited Review:</b>																
Cape Coral AA	35	5.08	18.96	16.13	18.96	41.94	21.42	9.68	40.66	32.26	0.15	0.47	0.67	0.00	0.03	
Ft Lauderdale AA	155	22.50	22.03	15.00	17.44	25.71	19.79	10.00	40.73	49.29	0.28	1.18	0.43	0.16	0.21	
Naples AA	19	2.76	21.14	50.00	18.31	0.00	19.04	12.50	41.50	37.50	0.03	0.34	0.00	0.00	0.02	
North Port AA	27	3.92	19.55	13.04	19.05	39.13	20.92	21.74	40.47	26.09	0.14	0.60	0.36	0.08	0.07	
Orlando AA	23	3.34	19.31	16.67	17.54	16.67	19.98	16.67	43.17	50.00	0.01	0.09	0.00	0.02	0.01	
Port St Lucie AA	33	4.79	18.62	7.14	20.11	64.29	20.32	14.29	40.95	14.29	0.31	0.36	1.16	0.21	0.06	
Punta Gorda AA	3	0.44	16.43	50.00	19.62	0.00	25.30	50.00	38.65	0.00	0.00	0.00	0.00	0.00	0.00	
Sebastian AA	22	3.19	20.32	55.00	16.98	40.00	21.98	0.00	40.72	5.00	0.89	5.47	1.59	0.00	0.00	
Tampa AA	59	8.56	20.13	32.00	17.76	42.00	19.51	8.00	42.60	18.00	0.14	0.82	0.41	0.05	0.04	
West Palm Beach AA	97	14.08	21.50	18.75	17.84	25.00	18.93	12.50	41.73	43.75	0.15	0.45	0.18	0.09	0.13	

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 20.5% of loans originated and purchased by bank.

1 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014									
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>1</sup>				
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>2</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Miami AA	4	57.14	23.23	0.00	17.00	25.00	18.29	25.00	41.48	50.00	0.20	0.00	0.81	0.00	0.16
<b>Limited Review:</b>															
Cape Coral AA	0	0.00	18.96	0.00	18.96	0.00	21.42	0.00	40.66	0.00	0.00	0.00	0.00	0.00	0.00
Ft Lauderdale AA	2	28.57	22.03	0.00	17.44	0.00	19.79	50.00	40.73	50.00	0.11	0.00	0.00	0.00	0.18
Naples AA	0	0.00	21.14	0.00	18.31	0.00	19.04	0.00	41.50	0.00	0.00	0.00	0.00	0.00	0.00
North Port AA	0	0.00	19.55	0.00	19.05	0.00	20.92	0.00	40.47	0.00	0.00	0.00	0.00	0.00	0.00
Orlando AA	1	14.29	19.31	0.00	17.54	0.00	19.98	0.00	43.17	100.00	0.00	0.00	0.00	0.00	0.00
Port St Lucie AA	0	0.00	18.62	0.00	20.11	0.00	20.32	0.00	40.95	0.00	0.00	0.00	0.00	0.00	0.00
Punta Gorda AA	0	0.00	16.43	0.00	19.62	0.00	25.30	0.00	38.65	0.00	0.00	0.00	0.00	0.00	0.00
Sebastian AA	0	0.00	20.32	0.00	16.98	0.00	21.98	0.00	40.72	0.00	0.00	0.00	0.00	0.00	0.00
Tampa AA	0	0.00	20.13	0.00	17.76	0.00	19.51	0.00	42.60	0.00	0.00	0.00	0.00	0.00	0.00
West Palm Beach AA	0	0.00	21.50	0.00	17.84	0.00	18.93	0.00	41.73	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

2 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014					Market Share <sup>*</sup>				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>3</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Miami AA	160	35.87	23.23	0.00	17.00	6.62	18.29	7.95	41.48	85.43	0.24	0.00	0.20	0.12	0.30	
<b>Limited Review:</b>																
Cape Coral AA	13	2.91	18.96	0.00	18.96	38.46	21.42	23.08	40.66	38.46	0.03	0.00	0.07	0.05	0.02	
Ft Lauderdale AA	105	23.54	22.03	4.00	17.44	9.00	19.79	16.00	40.73	71.00	0.13	0.15	0.12	0.10	0.14	
Naples AA	14	3.14	21.14	9.09	18.31	9.09	19.04	45.45	41.50	36.36	0.10	0.25	0.00	0.09	0.10	
North Port AA	22	4.93	19.55	5.26	19.05	31.58	20.92	15.79	40.47	47.37	0.05	0.00	0.11	0.04	0.05	
Orlando AA	21	4.71	19.31	0.00	17.54	30.00	19.98	10.00	43.17	60.00	0.03	0.00	0.09	0.00	0.03	
Port St Lucie AA	16	3.59	18.62	18.18	20.11	9.09	20.32	36.36	40.95	36.36	0.10	0.39	0.12	0.23	0.00	
Punta Gorda AA	1	0.22	16.43	0.00	19.62	0.00	25.30	100.00	38.65	0.00	0.04	0.00	0.00	0.15	0.00	
Sebastian AA	8	1.79	20.32	12.50	16.98	12.50	21.98	25.00	40.72	50.00	0.18	0.00	0.26	0.23	0.18	
Tampa AA	26	5.83	20.13	9.09	17.76	40.91	19.51	13.64	42.60	36.36	0.04	0.05	0.16	0.02	0.02	
West Palm Beach AA	60	13.45	21.50	9.09	17.84	5.45	18.93	14.55	41.73	70.91	0.12	0.28	0.07	0.07	0.12	

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 10.1% of loans originated and purchased by bank.

3 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: FLORIDA			Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Miami AA	1,029	33.30	70.89	43.15	51.02	22.74	26.24	0.54	0.49
<b>Limited Review:</b>									
Cape Coral AA	75	2.43	73.85	58.67	56.00	29.33	14.67	0.19	0.14
Ft Lauderdale AA	890	28.80	72.52	48.99	48.54	22.25	29.21	0.77	0.63
Naples AA	75	2.43	72.49	53.33	61.33	21.33	17.33	0.35	0.38
North Port AA	105	3.40	73.15	51.43	49.52	23.81	26.67	0.36	0.22
Orlando AA	81	2.62	71.91	39.51	27.16	22.22	50.62	0.11	0.11
Port St Lucie AA	77	2.49	74.93	50.65	58.44	22.08	19.48	0.28	0.34
Punta Gorda AA	21	0.68	74.09	52.38	80.95	14.29	4.76	0.11	0.16
Sebastian AA	34	1.10	58.33	32.35	61.76	26.47	11.76	0.35	0.08
Tampa AA	167	5.40	68.92	57.49	47.90	19.16	32.93	0.14	0.14
West Palm Beach AA	536	17.35	72.17	52.05	47.01	25.75	27.24	0.63	0.63

\* Based on 2012 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2013).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 1.29% of small loans to businesses originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: FLORIDA			Evaluation Period: OCTOBER 9, 2012 TO DECEMBER 31, 2014				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Miami AA	0	0	55	47,802	55	47,802	52.43	0	0
<b>Limited Review:</b>									
Cape Coral AA	0	0	8	1,710	8	1,710	1.88	0	0
Ft Lauderdale AA	0	0	43	17,053	43	17,053	18.71	0	0
Naples AA	0	0	5	385	5	385	0.42	0	0
North Port AA	0	0	14	1,860	14	1,860	2.04	0	0
Orlando AA	0	0	17	1,863	17	1,863	2.04	0	0
Port St Lucie AA	0	0	21	2,836	21	2,836	3.11	0	0
Punta Gorda AA	0	0	9	640	9	640	0.70	0	0
Sebastian AA	0	0	12	1,899	12	1,899	2.08	0	0
Tampa AA	0	0	16	4,292	16	4,292	4.71	0	0
West Palm Beach AA	0	0	25	10,735	25	10,735	11.78	0	0
Florida State No PMF	0	0	12	89	12	89	0.10	0	0

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

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

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: FLORIDA Evaluation Period: JANUARY 1, 2012 TO DECEMBER 31, 2014																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Miami AA	52.95	26	26.00	0.00	15.38	34.62	50.00	4	3	0	+2	0	-1	5.06	26.89	34.46	33.01
<b>Limited Review:</b>																	
Cape Coral AA	2.31	3	3.00	0.00	0.00	33.33	66.67	0	0	0	0	0	0	3.49	19.26	52.98	24.27
Ft Lauderdale AA	15.57	24	24.00	0.00	29.17	33.33	37.50	5	3	0	+2	-1	+1	4.13	28.90	35.76	31.21
Naples AA	1.88	3	3.00	0.00	33.33	33.33	33.33	1	1	0	0	+1	-1	9.05	20.27	43.40	27.27
North Port AA	3.22	5	5.00	0.00	40.00	60.00	0.00	1	0	0	+1	0	0	2.67	23.45	46.77	27.11
Orlando AA	1.00	5	5.00	0.00	20.00	40.00	40.00	2	0	0	0	+1	+1	1.19	24.76	35.65	38.40
Port St Lucie AA	3.41	5	5.00	0.00	20.00	40.00	40.00	1	2	0	0	-1	0	2.29	19.63	55.65	22.43
Punta Gorda AA	1.21	1	1.00	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	7.06	76.70	16.23
Sebastian AA	1.50	2	2.00	50.00	0.00	50.00	0.00	0	0	0	0	0	0	2.30	14.60	59.37	23.73
Tampa AA	4.23	9	9.00	0.00	22.22	33.33	44.44	1	1	0	+1	-1	0	4.33	22.42	40.64	32.37
West Palm Beach AA	12.72	17	17.00	5.88	11.76	47.06	35.29	4	3	0	0	+1	0	4.88	26.01	33.30	35.59

**Table 1. Lending Volume**

LENDING VOLUME		Geography: NEW YORK						Evaluation Period: FEBRUARY 29, 2012 TO DECEMBER 31, 2014				
Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
New York AA	80.14	213	279,904	134	70,924	0	0	19	174,612	347	350,828	70.53
<b>Limited Review:</b>												
Nassau AA	19.86	43	27,692	43	23,796	0	0	3	30,000	86	51,488	29.47
								1	1,500			

\* Loan Data as of December 31, 2014. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 9, 2012 to December 31, 2014, and includes CEMA loans.

\*\*\* Deposit Data as of December 31, 2014. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: NEW YORK				Evaluation Period: FEBRUARY 29, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
New York AA	115	79.31	5.95	2.61	24.27	17.39	23.97	5.22	45.81	74.78	0.11	0.08	0.02	0.05	0.18	
<b>Limited Review:</b>																
Nassau AA	30	20.69	0.96	0.00	20.68	33.33	62.11	60.00	16.25	6.67	0.09	0.00	0.29	0.03	0.04	

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: NEW YORK				Evaluation Period: FEBRUARY 29, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
New York AA	0	0.00	5.95	0.00	24.27	0.00	23.97	0.00	45.81	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Nassau AA	0	0.00	0.96	0.00	20.68	0.00	62.11	0.00	16.25	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: NEW YORK				Evaluation Period: FEBRUARY 29, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans					
<b>Full Review:</b>															
New York AA	72	84.71	5.95	8.33	24.27	20.83	23.97	12.50	45.81	58.33	0.10	0.00	0.06	0.00	0.15
<b>Limited Review:</b>															
Nassau AA	13	15.29	0.96	0.00	20.68	30.77	62.11	61.54	16.25	7.69	0.03	0.00	0.09	0.02	0.03

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: NEW YORK				Evaluation Period: FEBRUARY 29, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
New York AA	25	100.00	16.79	8.00	28.55	36.00	12.39	0.00	42.27	56.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Nassau AA	0	0.00	0.76	0.00	39.39	0.00	55.45	0.00	4.39	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: NEW YORK				Evaluation Period: FEBRUARY 29, 2012 TO DECEMBER 31, 2014					Market Share (%) by Geography*				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans						
<b>Full Review:</b>																
New York AA	130	75.14	9.67	16.92	20.53	32.31	13.61	9.23	51.50	41.54	0.06	0.08	0.09	0.06	0.04	
<b>Limited Review:</b>																
Nassau AA	43	24.86	0.62	0.00	20.32	27.91	63.24	53.49	15.82	18.60	0.04	0.00	0.08	0.03	0.02	

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2013).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: NEW YORK				Evaluation Period: FEBRUARY 29, 2012 TO DECEMBER 31, 2014									
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>4</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
New York AA	116	79.45	33.13	0.00	16.48	16.00	14.79	10.00	35.60	74.00	0.05	0.00	0.10	0.00	0.06
<b>Limited Review:</b>															
Nassau AA	30	20.55	19.92	10.00	20.12	35.00	24.95	15.00	35.02	40.00	0.09	0.20	0.17	0.05	0.04

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 52.1% of loans originated and purchased by bank.

<sup>4</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: NEW YORK					Evaluation Period: FEBRUARY 29, 2012 TO DECEMBER 31, 2014					Market Share <sup>†</sup>				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>5</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
<b>Full Review:</b>																
New York AA	0	0.00	33.13	0.00	16.48	0.00	14.79	0.00	35.60	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Nassau AA	0	0.00	19.92	0.00	20.12	0.00	24.95	0.00	35.02	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

5 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: NEW YORK				Evaluation Period: FEBRUARY 29, 2012 TO DECEMBER 31, 2014									
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>6</sup>				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>6</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
New York AA	72	84.71	33.13	11.43	16.48	34.29	14.79	5.71	35.60	48.57	0.03	0.00	0.11	0.00	0.03
<b>Limited Review:</b>															
Nassau AA	13	15.29	19.92	37.50	20.12	12.50	24.95	12.50	35.02	37.50	0.03	0.15	0.03	0.00	0.03

\* Based on 2013 Peer Mortgage Data -- US and PR

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 49.4% of loans originated and purchased by bank.

<sup>6</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2014					Geography: NEW YORK			Evaluation Period: FEBRUARY 29, 2012 TO	
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
New York AA	134	75.71	70.53	64.93	2.99	15.67	81.34	0.06	0.02
<b>Limited Review:</b>									
Nassau AA	43	24.29	76.44	32.56	11.63	16.28	72.09	0.04	0.01

\* Based on 2013 Peer Small Business Data -- US and PR

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2013).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.00% of small loans to businesses originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NEW YORK				Evaluation Period: OCTOBER 9, 2012 TO DECEMBER 31, 2014			
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
New York AA	0	0	28	13,292	28	13,292	78.26	0	0
<b>Limited Review:</b>									
Nassau AA	0	0	9	3,693	9	3,693	21.74	0	0

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

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



**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS Geography: NEW YORK <b>Evaluation Period:</b> JANUARY 1, 2012 TO DECEMBER 31, 2014																	
Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
New York AA	70.53	5	83.33	20.00	20.00	0.00	60.00	5	2	0	0	0	+3	19.16	35.33	17.48	27.92
<b>Limited Review:</b>																	
Nassau AA	29.47	1	16.67	0.00	0.00	100.00	0.00	1	1	0	0	0	0	1.56	25.05	59.30	14.09



