



**WINTER PARK NATIONAL BANK**

**201 N. New York Avenue, Suite 100**

**Winter Park, FL 32789**

**CRA PUBLIC FILE**

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**Winter Park, FL 32789**

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**WINTER PARK NATIONAL BANK**

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**BRANCH LOCATIONS**

<b>BRANCH NAME / ADDRESS / CENSUS TRACT CODE</b>	<b>HOURS</b>	<b>OPEN DATE</b>	<b>CLOSE DATE</b>
Main Office (Lobby) 201 N. New York Avenue, Ste 100 Winter Park, FL 32789  Census Tract Code: 0159.01	Monday – Friday 8:30am – 5:00pm	8/1/2017	
Main Office (Drive-Thru) 345 Carolina Avenue Winter Park, FL 32789  Census Tract Code: 0159.01	Monday – Friday 8:30am – 5:00pm	9/11/2019	
Longwood Office 505 Wekiva Springs Road, Ste 700 Longwood, FL 32779  Census Tract Code: 0216.12	Monday – Friday 8:30am – 5:00pm	8/1/2022	

FFIEC Year: 2023 Address: 201 N New York Ave, Winter Park, FL, 32789, USA

Reset Print

Matched Address	
Address	201 N New York Ave, Winter Park, Florida, 32789
MSA/MD Code	36740
State Code	12
County Code	095
Tract Code	0159.01
MSA/MD Name	ORLANDO-KISSIMMEE-SANFORD, FL
State Name	FLORIDA
County Name	ORANGE COUNTY

Census Demographic Data

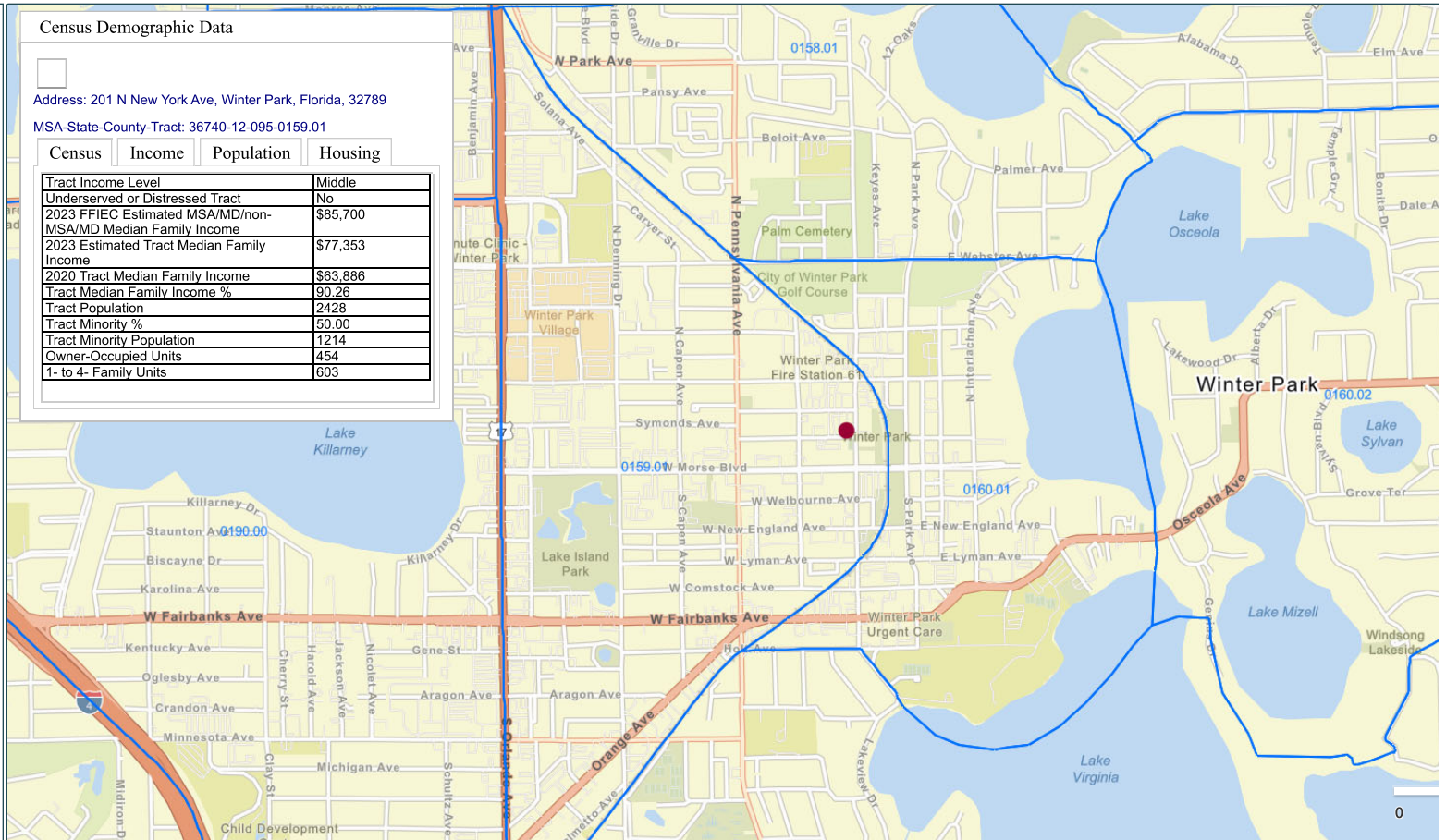
User Select Tract

Census Demographic Data

Address: 201 N New York Ave, Winter Park, Florida, 32789

MSA-State-County-Tract: 36740-12-095-0159.01

Census	Income	Population	Housing
Tract Income Level	Middle		
Underserved or Distressed Tract	No		
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$85,700		
2023 Estimated Tract Median Family Income	\$77,353		
2020 Tract Median Family Income	\$63,886		
Tract Median Family Income %	90.26		
Tract Population	2428		
Tract Minority %	50.00		
Tract Minority Population	1214		
Owner-Occupied Units	454		
1- to 4- Family Units	603		



FFIEC Year: 2023 Address: 345 Carolina Ave, Winter Park, FL, 32789, USA

Reset Print

Matched Address	
Address	345 Carolina Ave, Winter Park, Florida, 32789
MSA/MD Code	36740
State Code	12
County Code	095
Tract Code	0159.01
MSA/MD Name	ORLANDO-KISSIMEE-SANFORD, FL
State Name	FLORIDA
County Name	ORANGE COUNTY

Census Demographic Data

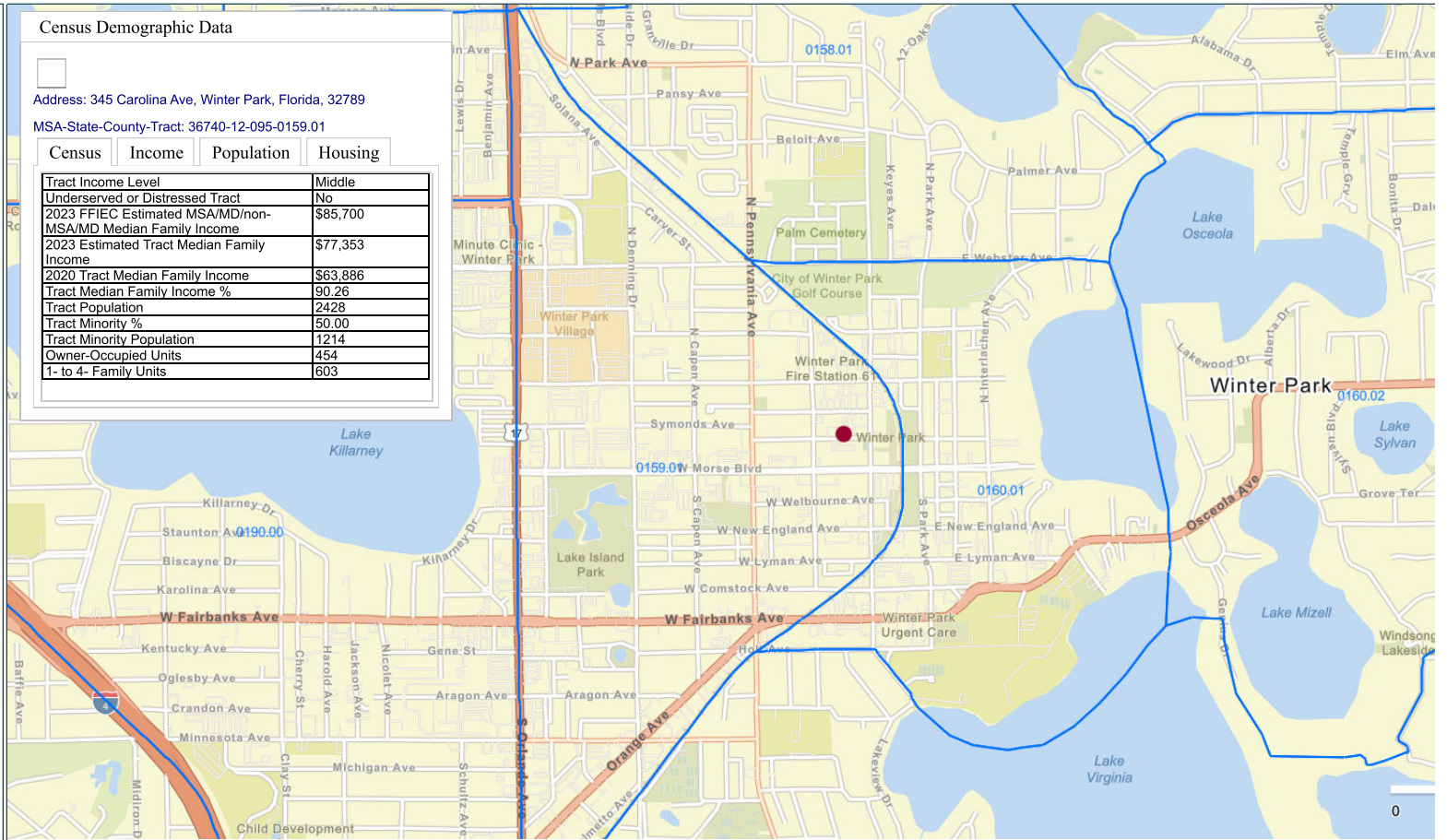
User Select Tract

Census Demographic Data

Address: 345 Carolina Ave, Winter Park, Florida, 32789  
MSA-State-County-Tract: 36740-12-095-0159.01

Census Income Population Housing

Tract Income Level	Middle
Underserved or Distressed Tract	No
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$85,700
2023 Estimated Tract Median Family Income	\$77,353
2020 Tract Median Family Income	\$63,886
Tract Median Family Income %	90.26
Tract Population	2428
Tract Minority %	50.00
Tract Minority Population	1214
Owner-Occupied Units	454
1- to 4- Family Units	603



FFIEC Year: 2023 Address: 505 Wekiva Springs Rd, Longwood, FL, 32779, USA

Reset Print

Matched Address	
Address	505 Wekiva Springs Rd, Longwood, Florida, 32779
MSA/MD Code	36740
State Code	12
County Code	117
Tract Code	0216.12
MSA/MD Name	ORLANDO-KISSIMMEE-SANFORD, FL
State Name	FLORIDA
County Name	SEMINOLE COUNTY

Census Demographic Data

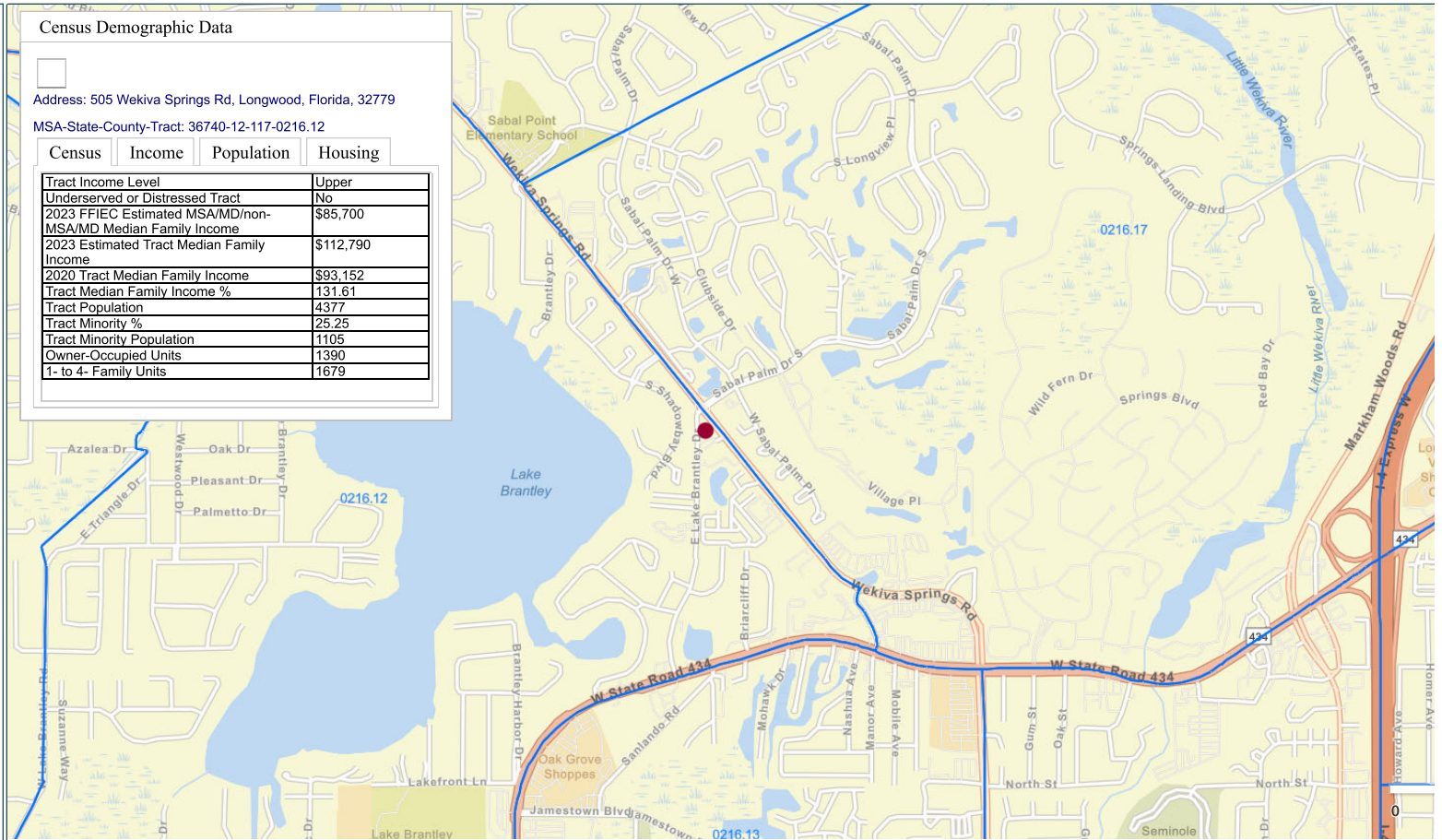
User Select Tract

Census Demographic Data

Address: 505 Wekiva Springs Rd, Longwood, Florida, 32779

MSA-State-County-Tract: 36740-12-117-0216.12

Census	Income	Population	Housing
Tract Income Level			Upper
Underserved or Distressed Tract			No
2023 FFIEC Estimated MSA/MD/non-MSA/MD Median Family Income	\$85,700		
2023 Estimated Tract Median Family Income	\$112,790		
2020 Tract Median Family Income	\$93,152		
Tract Median Family Income %	131.61		
Tract Population		4377	
Tract Minority %		25.25	
Tract Minority Population		1105	
Owner-Occupied Units		1390	
1- to 4- Family Units		1679	





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## About Us

Winter Park National Bank was created under one central concept: our client relationships are about more than deposits and transactions. We serve our community with personalized, attentive service instead of a "one-size-fits-all" approach. More than just a boutique operation, we aim to be the bank that remembers your name before your account number. With 40 years entrenched in the Central Florida community, our team can apply its extensive experience to meeting your specific banking needs.

Serving attorneys, doctors, CPAs, contractors and local small business entrepreneurs, we are inspired every day to be more than just a bank, but your bank. Community. Care. Conscience. These are the fundamentals of Winter Park National Bank.

**WINTER PARK NATIONAL BANK**

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**BANK PRODUCTS & SERVICES**

Attached is a list of the Bank's account products and services, including fees, as well as an overview of the loan products that we offer.





## Products & Services

### Personal Accounts

#### Personal Checking

- \$100 minimum opening deposit
- Average daily balance of \$500 to avoid a monthly service charge of \$10
- Free E-statement or \$3 fee for paper statement
- No Interest
- Free online banking with bill pay
- Free mobile banking
- MasterCard Debit Card
- First order free starter checks

#### Senior Checking (55 & Over)

- \$100 minimum opening deposit
- Average daily balance of \$500 to avoid a monthly service charge of \$7
- Free E-statement or \$3 fee for paper statement
- Earns Interest
- Free online banking with bill pay
- Free mobile banking
- MasterCard Debit Card
- First order free starter checks
- Free official checks

#### Interest Checking

- \$100 minimum opening deposit
- Average daily balance of \$2,500 to avoid a monthly service charge of \$15
- Free E-statement or \$3 fee for paper statement
- Tiered Interest Rates paid on average daily collected balances of \$2,500 or more
- Free online banking with bill pay
- Free mobile banking
- MasterCard Debit Card

#### Personal Savings

- \$100 minimum opening deposit
- Average daily balance of \$500 to avoid a monthly service charge of \$5
- Free E-statement or \$3 fee for paper statement
- Earns Interest
- Free online banking
- Free mobile banking

**Important notice:** Only six preauthorized debit transactions are allowed per monthly statement cycle.

## Youth Savings

- \$25 minimum opening deposit
- Free E-statement or \$3 fee for paper statement
- Earns Interest
- Free online banking
- Free mobile banking

**Important notice:** Only six preauthorized debit transactions are allowed per monthly statement cycle.

## Health Savings Account (HSA)

A Health Savings Account (HSA) offers you the ability to save for your health care deductible and pay for qualified medical expenses. There are tax savings for eligible customers.

- \$100 minimum opening deposit
- No monthly service charge
- Free E-statement or \$3 fee for paper statement
- Earns Interest
- MasterCard Debit Card
- Tax -Free withdrawals for qualified medical expenses. Visit [www.irs.gov](http://www.irs.gov) for a complete list of qualified expenses.
- Tax deductible contributions up to the annual contribution limit. Visit [www.irs.gov](http://www.irs.gov) for information about contribution limits.

Consult with your tax advisor or health insurance provider for more information.

## Eligibility

- You are covered under a high-deductible health plan (HDHP)
- You are not covered under another type of health plan that is not an HDHP (certain exceptions apply)
- You are not enrolled in Medicare
- You may not be claimed as a dependent on another individual's tax return

## Personal Money Market Account

- \$100 minimum opening deposit
- Average daily balance of \$2,500 to avoid a monthly service charge of \$15
- Free E-statement or \$3 fee for paper statement
- Tiered Interest Rates paid on average daily collected balances of \$2,500 or more
- Free online banking
- Free mobile banking

**Important notice:** The number of withdrawals and/or transfers are limited to six that may be made from a money market account by check, debit card, telephone/PC transfer (including bill payments) and preauthorized transfer each monthly statement cycle.

## Certificates of Deposit (CDs) and Individual Retirement Accounts (IRAs)

- \$1,000 minimum opening deposit
- Competitive interest rates
- Available in a variety of terms
- Automatically renewable for your convenience with a 10 day grace period
- A penalty may be imposed for early withdrawal

## Business Accounts

### Economy Business Checking

- \$100 minimum opening deposit
- Average daily balance of \$500 to avoid a monthly service charge of \$10
- 250 transactions free -/\$.50 for any transactions over 250. (Items include deposits, checks, deposited items, debits & credits)

- Free E-statement or \$3 fee for paper statement
- No Interest
- Free online banking with bill pay
- Free mobile banking
- MasterCard Debit Card

### Small Business

- \$100 minimum opening deposit
- Average daily balance of \$5,000 to avoid a monthly service charge of \$15
- 500 transactions free/\$.50 for any transactions over 500. (Items include deposits, checks, deposited items, debits & credits)
- Free E-statement or \$3 fee for paper statement
- No Interest
- Free online banking with bill pay
- Free mobile banking
- MasterCard Debit Card

### Commercial Checking

- Earnings credit allowance is calculated on the average collected balance less a 10% reserve requirement and applied to offset fees

### IOLTA Checking

#### Commercial Interest Checking

- \$100 minimum opening deposit
- Average daily balance of \$5,000 to avoid a monthly service charge of \$25
- 500 transactions free/\$.50 for any transactions over 500. (Items include deposits, checks, deposited items, debits & credits)
- Free E-statement or \$3 fee for paper statement
- Tiered Interest Rates paid on average daily collected balances of \$2,500 or more
- Free online banking with bill pay
- Free mobile banking
- MasterCard Debit Card

#### Commercial Money Market Account

- \$100 minimum opening deposit
- Average daily balance of \$2,500 to avoid a monthly service charge of \$15
- Tiered Interest Rates paid on average daily collected balances of \$2,500 or more
- Free E-statement or \$3 fee for paper statement
- Free online banking
- Free mobile banking

**Important notice:** The number of withdrawals and/or transfers are limited to six that may be made from a money market account by check, debit card, telephone/PC transfer (including bill payments) and preauthorized transfer each monthly statement cycle.

#### Commercial Savings

- \$100 minimum opening deposit
- Average daily balance of \$500 to avoid a monthly service charge of \$5
- Free E-statement or \$3 fee for paper statement
- Earns Interest
- Free online banking
- Free mobile banking

**Important notice:** Only six preauthorized debit transactions are allowed per monthly statement cycle.

## Online Banking

LOGIN

[Enroll](#) | [Forgot Password](#)



## Send and Receive Money with Zelle®

Introducing Zelle® — a fast, safe and easy way to send money to friends, family and other people you trust, wherever they bank. Whether you're paying rent, gifting money, or splitting the cost of a bill, Zelle® has you covered.

[Learn More](#)

## Report a lost or stolen debit card

To report a lost or stolen debit card, 24 hours a day, 7 days a week, you can:

- Log in to Online Banking, select ATM/Debit Card from the Settings Tab, and then select Lost/Stolen
- Log in to the WPNB Mobile App, select your checking account and Manage Cards from the Menu, and then select Report Lost/Stolen
- After regular banking hours, call 1- 888-297-3416



## Get In Touch

Talk to one of our representatives or drop by the bank today to start banking better! [Contact Us](#)

[Privacy Policy](#) | [Terms of Use](#) | [Security Agreement](#)

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# CONSUMER LOANS & LINES OF CREDIT

[Home](#) • [Personal](#) • Consumer Loans & Lines of Credit

Whether it's high auto payments, the skyrocketing cost of higher education or mortgages, we know that life can present its fair share of road bumps and hurdles along the way. That's why we offer consumer loans and lines of credit with extremely competitive rates, providing you financial assistance when you need it most.

# BUSINESS LOANS & LINES OF CREDIT

[Home](#) • [Business](#) • Business Loans & Lines of Credit

We provide solutions that work not only for the short-term but also provide clear, long-term outlooks for your business' success.

- Purchase or refinance of owner-occupied and non-owner occupied commercial real estate, land acquisition, development and construction loans
- Acquire new equipment, company vehicles, machinery upgrades and more
- Highly competitive rates
- Dedicated, focused service to determine if your loan is right for your needs
- All decisions made locally

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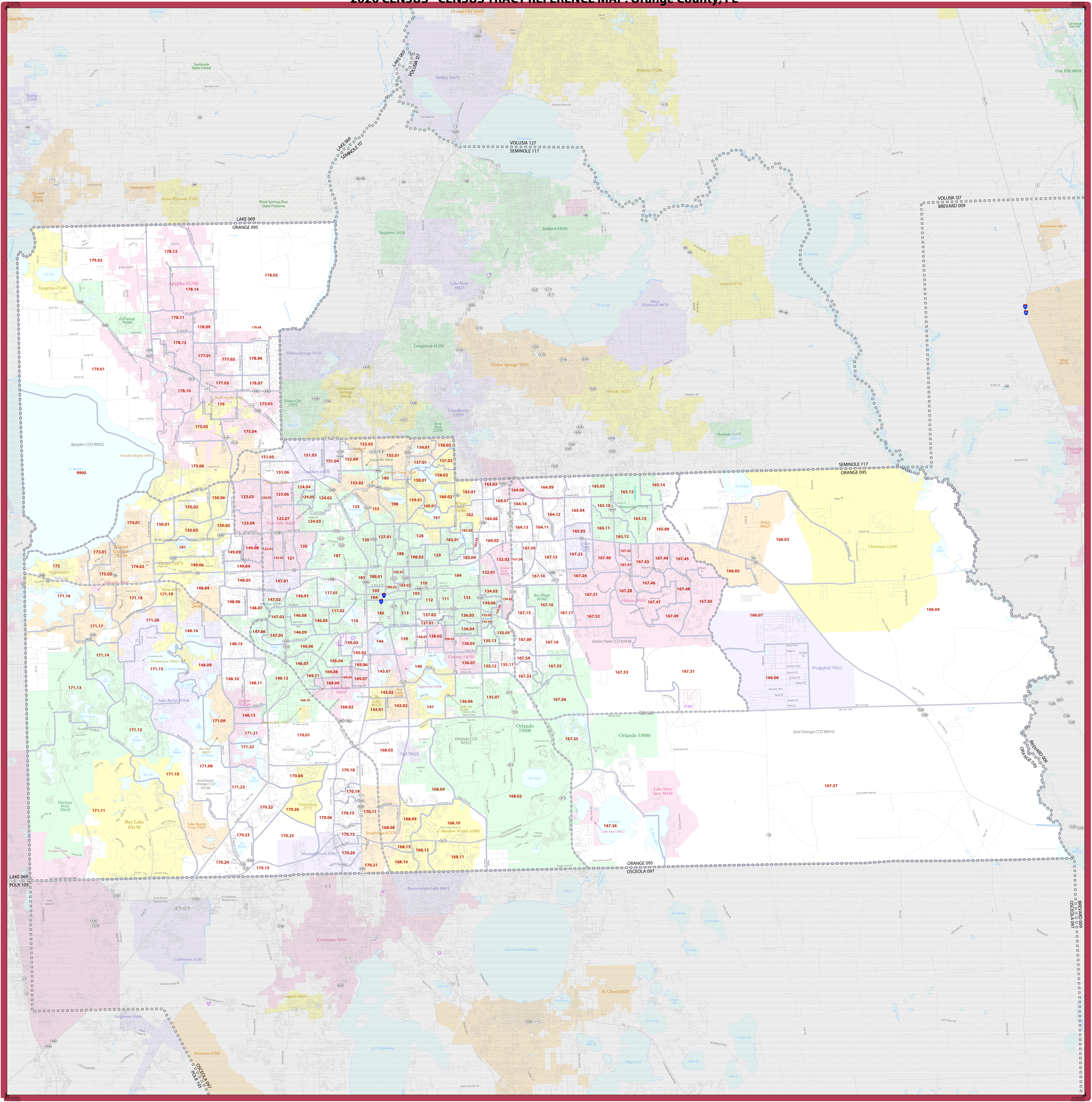
**CRA ASSESSMENT AREA**

Winter Park National Bank is a newly formed bank, opening on August 1, 2017.

Its assessment area for purposes of the Community Reinvestment Act is defined as Orange and Seminole Counties.

Census tract reference maps and summary census demographic information for each county is attached.

# 2020 CENSUS - CENSUS TRACT REFERENCE MAP: Orange County, FL



### LEGEND

SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE	SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
International	◆◆◆◆◆	CANADA	Incorporated Place 1,2	■	Davis 18100
Federal American Indian Reservation	■■■■■■■	L'ANSE RESVN 1880	Census Designated Place (CDP) <sup>1</sup>	■	Incline Village 35100
OE Reservation Trust Land	■■■■■■■	T1880	Census Tract <sup>3</sup>	■	33.07
State American Indian Reservation	■■■■■■■	Tama Resvn 9400	<b>DESCRIPTION</b>	<b>SYMBOL</b>	<b>DESCRIPTION</b>
Alaska Native Regional Corporation	▲▲▲▲▲	NANA ANRC 52120	Water Body	■	Planted Lake
State (or statistically equivalent entity)		NEW YORK 36	College or University	■	Canalway
County (or statistically equivalent entity)	□□□□□	ERIE 029	Minor Civil Division (MCD) <sup>4</sup>	■	Yorkeville NP
Census County Division (CCD), Census Subarea (CSA), or Unincorporated Territory (UT)	□□□□□	Bristol town 07485	Prison or Juvenile Detention Center	■	Inset Area
Consolidated City	□□□□□	Hanna CCD 91650	Navigable boundary or Feature Not Elsewhere Classified	■	
		MILFORD 47500	Outside Subject Area	■	

Where international, state, county, and/or MCD/CD boundaries coincide, the map shows the boundary symbol for only the highest-ranking of these boundaries.

Geographic area names are followed by either their FIPS or census code.

1. A \*\* following an MCD name denotes a false MCD. A \* following a place name indicates that a false MCD exists with the same name and FIPS code as the place; the false MCD label is not shown.

2. Place label color corresponds to the place fill color.

3. Census tracts are identified by an up to four-digit integer number and may have an optional two-digit suffix; for example 23 or 1457.02. The census tract codes consist of six digits with an implied decimal between the fourth and fifth digit corresponding to the basic census tract number, but with leading zeros, and trailing zeros for census tracts without a suffix. The tract number examples above would have codes of 002300 and 145702, respectively.

Due to space limitations, some road names, along with other feature and geography names on the map, may not be shown.

All legal boundaries and names are as of January 1, 2020. The boundaries shown on this map are for Census Bureau statistical data collection and tabulation purposes only; their depiction and designation for statistical purposes does not constitute a determination of jurisdictional authority or rights of ownership or entitlement.

Geographic Vintage: 2020 Census (reference date: January 1, 2020)  
 Data Source: U.S. Census Bureau's MAJ/TIGER database (TAB20)  
 Map Created by Geography Division, January 06, 2021

Projection: Albers Equal Area Conic  
 Datum: NAD 83  
 Spheroid: GRS 80  
 1st Standard Parallel: 22 29 46  
 2nd Standard Parallel: 29 53 54  
 Central Meridian: -83 48 17  
 Latitude of Projection Origin: 24 23 45  
 False Easting: 0  
 False Northing: 0

Scale: 1:100,000  
 0 1 2 Miles

Sheet 1 of 1 PARENT sheets  
 Total Sheets: 1 (Index 0; Parent 1; Inset 0)

NAME: Orange County (095)  
 ENTITY TYPE: County or statistically equivalent entity  
 ST: Florida (12)

2020 CENSUS TRACT REF MAP (PARENT)  
 Sheet ID: 24961205001

U.S. DEPARTMENT OF COMMERCE U.S. Census Bureau

2023 FFIEC Census Report - Summary Census Demographic Information

State: 12 - FLORIDA (FL)

County: 095 - ORANGE COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
12	095	0102.01	Upper	No	225.86	\$85,700	\$193,562	\$159,856	1829	29.14	533	291	855
12	095	0102.02	Upper	No	128.04	\$85,700	\$109,730	\$90,625	3861	31.11	1201	601	948
12	095	0103.00	Upper	No	143.62	\$85,700	\$123,082	\$101,646	3469	36.26	1258	325	790
12	095	0104.00	Low	No	32.50	\$85,700	\$27,853	\$23,007	1545	95.79	1480	48	291
12	095	0105.00	Unknown	No	0.00	\$85,700	\$0	\$0	1371	95.33	1307	78	498
12	095	0108.02	Upper	No	153.21	\$85,700	\$131,301	\$108,438	3292	28.95	953	959	1642
12	095	0110.00	Moderate	No	55.82	\$85,700	\$47,838	\$39,510	3132	39.40	1234	685	1467
12	095	0111.00	Upper	No	126.87	\$85,700	\$108,728	\$89,792	3122	36.80	1149	900	1162
12	095	0112.00	Upper	No	141.93	\$85,700	\$121,634	\$100,455	3293	24.08	793	1170	1516
12	095	0113.00	Upper	No	226.74	\$85,700	\$194,316	\$160,477	5440	25.81	1404	1590	2174
12	095	0116.00	Low	No	49.01	\$85,700	\$42,002	\$34,688	4817	82.81	3989	648	1575
12	095	0117.01	Moderate	No	74.75	\$85,700	\$64,061	\$52,904	4229	96.59	4085	821	1531
12	095	0117.02	Low	No	49.32	\$85,700	\$42,267	\$34,911	4365	97.73	4266	432	900
12	095	0120.00	Low	No	45.44	\$85,700	\$38,942	\$32,161	7003	93.47	6546	884	1819
12	095	0121.00	Moderate	No	55.29	\$85,700	\$47,384	\$39,133	6591	91.69	6043	743	1578
12	095	0122.01	Moderate	No	57.36	\$85,700	\$49,158	\$40,597	5054	91.79	4639	1014	1465
12	095	0122.02	Moderate	No	58.94	\$85,700	\$50,512	\$41,717	5083	90.44	4597	1124	1807
12	095	0123.03	Middle	No	101.68	\$85,700	\$87,140	\$71,966	7081	88.09	6238	1863	2647
12	095	0123.04	Moderate	No	62.16	\$85,700	\$53,271	\$43,994	6294	92.93	5849	1323	1937
12	095	0123.05	Moderate	No	71.19	\$85,700	\$61,010	\$50,385	7319	90.72	6640	1417	2090
12	095	0123.06	Moderate	No	69.05	\$85,700	\$59,176	\$48,876	3384	85.93	2908	813	1194
12	095	0123.07	Middle	No	85.13	\$85,700	\$72,956	\$60,250	6797	90.94	6181	1106	1977
12	095	0124.02	Moderate	No	56.63	\$85,700	\$48,532	\$40,086	5741	84.46	4849	337	878
12	095	0124.03	Moderate	No	65.52	\$85,700	\$56,151	\$46,375	5358	86.79	4650	1019	1692
12	095	0124.04	Moderate	No	53.23	\$85,700	\$45,618	\$37,674	4655	87.30	4064	779	1704
12	095	0124.05	Moderate	No	50.62	\$85,700	\$43,381	\$35,828	4125	85.45	3525	362	985

\* Will automatically be included in the 2024 Distressed or Underserved Tract List



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
12	095	0125.00	Upper	No	134.53	\$85,700	\$115,292	\$95,217	2463	24.08	593	536	1048
12	095	0126.00	Upper	No	176.21	\$85,700	\$151,012	\$124,717	5325	18.70	996	1531	2310
12	095	0127.01	Upper	No	190.24	\$85,700	\$163,036	\$134,643	5278	24.54	1295	1494	2175
12	095	0128.00	Upper	No	207.57	\$85,700	\$177,887	\$146,908	3918	17.10	670	1390	1742
12	095	0129.00	Upper	No	128.67	\$85,700	\$110,270	\$91,071	3875	31.10	1205	874	1171
12	095	0132.01	Moderate	No	65.08	\$85,700	\$55,774	\$46,060	4456	78.97	3519	960	1436
12	095	0132.02	Moderate	No	64.52	\$85,700	\$55,294	\$45,668	6435	79.02	5085	1029	1567
12	095	0133.00	Middle	No	93.69	\$85,700	\$80,292	\$66,313	6872	62.12	4269	1020	2022
12	095	0134.02	Moderate	No	77.09	\$85,700	\$66,066	\$54,561	3196	77.94	2491	848	1269
12	095	0134.03	Middle	No	81.85	\$85,700	\$70,145	\$57,935	3584	80.92	2900	571	1054
12	095	0134.05	Moderate	No	53.61	\$85,700	\$45,944	\$37,949	2529	83.79	2119	311	470
12	095	0134.06	Moderate	No	72.41	\$85,700	\$62,055	\$51,250	4039	84.87	3428	570	1202
12	095	0135.03	Moderate	No	52.06	\$85,700	\$44,615	\$36,845	2441	84.27	2057	0	528
12	095	0135.05	Moderate	No	74.39	\$85,700	\$63,752	\$52,652	4553	75.71	3447	820	1547
12	095	0135.07	Moderate	No	60.64	\$85,700	\$51,968	\$42,923	9054	82.76	7493	362	670
12	095	0135.10	Moderate	No	65.06	\$85,700	\$55,756	\$46,048	2562	81.26	2082	100	190
12	095	0135.11	Moderate	No	58.05	\$85,700	\$49,749	\$41,091	6500	78.23	5085	1574	2092
12	095	0135.12	Low	No	48.53	\$85,700	\$41,590	\$34,351	5280	87.33	4611	582	1019
12	095	0135.13	Moderate	No	55.83	\$85,700	\$47,846	\$39,514	4431	81.92	3630	414	642
12	095	0136.03	Moderate	No	66.15	\$85,700	\$56,691	\$46,823	5198	60.41	3140	983	1203
12	095	0136.04	Moderate	No	66.51	\$85,700	\$56,999	\$47,078	6371	62.06	3954	1135	1530
12	095	0136.05	Middle	No	89.99	\$85,700	\$77,121	\$63,693	4011	62.93	2524	545	797
12	095	0136.06	Moderate	No	62.55	\$85,700	\$53,605	\$44,271	3857	80.17	3092	704	995
12	095	0136.07	Middle	No	101.90	\$85,700	\$87,328	\$72,122	5394	52.21	2816	1439	1949
12	095	0137.01	Middle	No	85.50	\$85,700	\$73,274	\$60,517	4339	56.90	2469	556	1524
12	095	0137.02	Middle	No	83.53	\$85,700	\$71,585	\$59,119	5263	52.92	2785	925	1403
12	095	0138.01	Upper	No	127.65	\$85,700	\$109,396	\$90,349	2271	35.18	799	618	1091
12	095	0138.02	Upper	No	122.45	\$85,700	\$104,940	\$86,667	2645	22.65	599	821	1055
12	095	0138.03	Middle	No	109.23	\$85,700	\$93,610	\$77,313	2809	36.77	1033	670	926

\* Will automatically be included in the 2024 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
12	095	0139.00	Upper	No	167.31	\$85,700	\$143,385	\$118,417	4220	28.18	1189	976	1305
12	095	0140.00	Upper	No	157.19	\$85,700	\$134,712	\$111,250	6336	20.20	1280	2265	2446
12	095	0141.00	Upper	No	126.28	\$85,700	\$108,222	\$89,375	6599	36.14	2385	2066	2499
12	095	0142.01	Middle	No	93.71	\$85,700	\$80,309	\$66,326	5769	84.40	4869	1183	1658
12	095	0142.02	Moderate	No	56.62	\$85,700	\$48,523	\$40,075	4982	88.10	4389	584	1237
12	095	0143.01	Middle	No	96.45	\$85,700	\$82,658	\$68,268	5317	65.68	3492	1012	1477
12	095	0143.02	Moderate	No	66.17	\$85,700	\$56,708	\$46,838	5257	85.71	4506	557	1211
12	095	0144.00	Upper	No	124.77	\$85,700	\$106,928	\$88,311	3409	50.34	1716	830	1198
12	095	0145.02	Low	No	43.42	\$85,700	\$37,211	\$30,736	5934	92.21	5472	204	1209
12	095	0145.03	Low	No	43.82	\$85,700	\$37,554	\$31,016	6423	78.55	5045	742	1350
12	095	0145.04	Middle	No	84.71	\$85,700	\$72,596	\$59,957	6970	74.71	5207	485	837
12	095	0146.01	Moderate	No	56.63	\$85,700	\$48,532	\$40,082	8419	96.89	8157	585	1732
12	095	0146.05	Moderate	No	60.93	\$85,700	\$52,217	\$43,125	4564	98.33	4488	786	1651
12	095	0146.06	Moderate	No	56.67	\$85,700	\$48,566	\$40,111	8295	82.39	6834	466	1389
12	095	0146.07	Moderate	No	76.67	\$85,700	\$65,706	\$54,269	7057	75.80	5349	662	1031
12	095	0146.08	Moderate	No	62.61	\$85,700	\$53,657	\$44,318	4540	91.39	4149	573	1137
12	095	0146.09	Moderate	No	57.49	\$85,700	\$49,269	\$40,693	5388	86.86	4680	276	377
12	095	0147.01	Moderate	No	58.62	\$85,700	\$50,237	\$41,490	5613	84.00	4715	1135	1899
12	095	0147.02	Moderate	No	78.25	\$85,700	\$67,060	\$55,385	6130	77.01	4721	453	811
12	095	0147.03	Moderate	No	61.81	\$85,700	\$52,971	\$43,750	2627	81.42	2139	117	299
12	095	0147.05	Middle	No	80.71	\$85,700	\$69,168	\$57,125	8097	72.37	5860	515	1215
12	095	0147.06	Middle	No	88.39	\$85,700	\$75,750	\$62,558	5459	67.96	3710	144	161
12	095	0148.04	Moderate	No	75.57	\$85,700	\$64,763	\$53,486	6434	62.01	3990	922	1286
12	095	0148.05	Moderate	No	78.26	\$85,700	\$67,069	\$55,394	5155	79.52	4099	899	1589
12	095	0148.06	Upper	No	163.23	\$85,700	\$139,888	\$115,528	4635	52.04	2412	1222	1757
12	095	0148.07	Middle	No	118.01	\$85,700	\$101,135	\$83,522	7128	60.49	4312	1657	2395
12	095	0148.09	Upper	No	266.69	\$85,700	\$228,553	\$188,750	2953	26.68	788	1371	1750
12	095	0148.10	Upper	No	174.41	\$85,700	\$149,469	\$123,438	5681	37.97	2157	1439	2042

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12	095	0148.11	Upper	No	154.13	\$85,700	\$132,089	\$109,088	5656	38.05	2152	1519	2044
12	095	0148.12	Moderate	No	78.36	\$85,700	\$67,155	\$55,461	6172	63.40	3913	717	1316
12	095	0148.13	Upper	No	120.83	\$85,700	\$103,551	\$85,521	4765	47.41	2259	879	1697
12	095	0148.14	Upper	No	180.78	\$85,700	\$154,928	\$127,946	6754	40.72	2750	1441	1753
12	095	0148.15	Upper	No	249.87	\$85,700	\$214,139	\$176,850	5169	36.51	1887	1614	1742
12	095	0149.04	Moderate	No	51.24	\$85,700	\$43,913	\$36,269	6070	92.92	5640	370	1098
12	095	0149.06	Middle	No	92.19	\$85,700	\$79,007	\$65,248	6955	61.68	4290	1743	2128
12	095	0149.08	Moderate	No	65.73	\$85,700	\$56,331	\$46,524	6504	91.84	5973	1539	2276
12	095	0149.09	Middle	No	92.78	\$85,700	\$79,512	\$65,668	2895	82.63	2392	895	997
12	095	0150.01	Moderate	No	51.93	\$85,700	\$44,504	\$36,756	1754	74.23	1302	276	482
12	095	0150.02	Middle	No	101.14	\$85,700	\$86,677	\$71,587	6505	64.61	4203	1442	2160
12	095	0150.03	Middle	No	101.00	\$85,700	\$86,557	\$71,484	6748	59.88	4041	1339	2305
12	095	0150.05	Middle	No	96.66	\$85,700	\$82,838	\$68,413	3547	66.34	2353	842	1017
12	095	0150.06	Upper	No	125.65	\$85,700	\$107,682	\$88,929	4852	65.64	3185	1374	1806
12	095	0151.03	Middle	No	115.26	\$85,700	\$98,778	\$81,575	6546	58.28	3815	1938	2496
12	095	0151.04	Moderate	No	59.26	\$85,700	\$50,786	\$41,944	5362	65.18	3495	1256	1940
12	095	0151.05	Moderate	No	76.14	\$85,700	\$65,252	\$53,893	3723	67.63	2518	1044	1287
12	095	0151.06	Moderate	No	72.51	\$85,700	\$62,141	\$51,322	7425	83.93	6232	1912	2404
12	095	0152.02	Moderate	No	76.81	\$85,700	\$65,826	\$54,365	6058	65.45	3965	920	1808
12	095	0152.03	Middle	No	112.88	\$85,700	\$96,738	\$79,896	3088	64.28	1985	169	384
12	095	0152.04	Middle	No	80.33	\$85,700	\$68,843	\$56,857	5375	58.08	3122	670	965
12	095	0153.00	Upper	No	133.51	\$85,700	\$114,418	\$94,494	4068	33.92	1380	1213	1733
12	095	0155.01	Upper	No	121.70	\$85,700	\$104,297	\$86,133	6127	34.81	2133	1106	1882
12	095	0156.01	Upper	No	201.34	\$85,700	\$172,548	\$142,500	3042	27.78	845	760	864
12	095	0156.02	Upper	No	234.90	\$85,700	\$201,309	\$166,250	2394	12.87	308	649	716
12	095	0157.01	Upper	No	183.09	\$85,700	\$156,908	\$129,583	2217	17.91	397	683	611
12	095	0157.02	Upper	No	175.88	\$85,700	\$150,729	\$124,479	1798	21.19	381	498	680
12	095	0158.01	Upper	No	274.64	\$85,700	\$235,366	\$194,375	1712	17.99	308	584	717
12	095	0158.02	Upper	No	284.94	\$85,700	\$244,194	\$201,667	2595	18.23	473	887	989

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12	095	0159.01	Middle	No	90.26	\$85,700	\$77,353	\$63,886	2428	50.00	1214	454	603
12	095	0160.01	Upper	No	210.17	\$85,700	\$180,116	\$148,750	2085	20.58	429	412	210
12	095	0160.02	Upper	No	285.70	\$85,700	\$244,845	\$202,202	2537	18.68	474	928	1207
12	095	0161.00	Upper	No	280.43	\$85,700	\$240,329	\$198,472	4742	18.41	873	1364	1557
12	095	0162.00	Upper	No	172.62	\$85,700	\$147,935	\$122,171	7062	34.45	2433	1878	2432
12	095	0163.01	Middle	No	105.24	\$85,700	\$90,191	\$74,485	5569	43.20	2406	908	1316
12	095	0163.02	Middle	No	81.49	\$85,700	\$69,837	\$57,679	3899	62.40	2433	370	1071
12	095	0164.02	Moderate	No	64.99	\$85,700	\$55,696	\$46,000	2729	71.93	1963	344	653
12	095	0164.06	Moderate	No	60.38	\$85,700	\$51,746	\$42,734	2045	60.20	1231	205	593
12	095	0164.07	Unknown	No	0.00	\$85,700	\$0	\$0	6604	61.36	4052	528	1229
12	095	0164.08	Upper	No	126.04	\$85,700	\$108,016	\$89,205	2296	44.99	1033	391	620
12	095	0164.09	Upper	No	164.67	\$85,700	\$141,122	\$116,546	3289	35.09	1154	1019	1194
12	095	0164.11	Middle	No	116.87	\$85,700	\$100,158	\$82,716	3557	61.34	2182	497	872
12	095	0164.12	Middle	No	89.19	\$85,700	\$76,436	\$63,125	4882	59.69	2914	1062	1695
12	095	0164.13	Moderate	No	72.55	\$85,700	\$62,175	\$51,350	4297	71.07	3054	941	1197
12	095	0164.14	Moderate	No	73.58	\$85,700	\$63,058	\$52,080	4378	64.16	2809	635	961
12	095	0165.03	Middle	No	109.70	\$85,700	\$94,013	\$77,644	9397	44.81	4211	841	1239
12	095	0165.04	Middle	No	104.32	\$85,700	\$89,402	\$73,837	5031	61.74	3106	1037	1571
12	095	0165.05	Middle	No	96.93	\$85,700	\$83,069	\$68,603	3151	63.50	2001	411	580
12	095	0165.09	Middle	No	80.36	\$85,700	\$68,869	\$56,875	4845	44.64	2163	1400	2067
12	095	0165.10	Low	No	46.58	\$85,700	\$39,919	\$32,973	8424	48.25	4065	34	402
12	095	0165.11	Upper	No	120.35	\$85,700	\$103,140	\$85,179	6338	50.82	3221	353	906
12	095	0165.12	Upper	No	152.81	\$85,700	\$130,958	\$108,153	7464	49.10	3665	3	1126
12	095	0165.13	Middle	No	80.24	\$85,700	\$68,766	\$56,791	5408	65.63	3549	1194	1602
12	095	0165.14	Upper	No	145.62	\$85,700	\$124,796	\$103,065	6503	50.07	3256	1604	2477
12	095	0165.15	Unknown	No	0.00	\$85,700	\$0	\$0	8246	41.71	3439	0	0
12	095	0166.03	Upper	No	123.15	\$85,700	\$105,540	\$87,160	7516	50.68	3809	1865	2572
12	095	0166.04	Middle	No	101.06	\$85,700	\$86,608	\$71,531	5178	37.37	1935	1196	1426

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12	095	0166.05	Moderate	No	62.47	\$85,700	\$53,537	\$44,219	1601	39.48	632	235	699
12	095	0166.06	Upper	No	185.11	\$85,700	\$158,639	\$131,016	2690	44.20	1189	702	765
12	095	0166.07	Middle	No	86.83	\$85,700	\$74,413	\$61,460	6251	48.97	3061	1572	2161
12	095	0167.09	Moderate	No	79.35	\$85,700	\$68,003	\$56,161	6907	84.42	5831	1646	2386
12	095	0167.10	Middle	No	98.19	\$85,700	\$84,149	\$69,500	4211	71.79	3023	1086	1420
12	095	0167.13	Moderate	No	68.14	\$85,700	\$58,396	\$48,226	8645	78.02	6745	1758	2711
12	095	0167.14	Middle	No	109.36	\$85,700	\$93,722	\$77,404	3121	71.90	2244	730	982
12	095	0167.15	Middle	No	88.30	\$85,700	\$75,673	\$62,500	6891	75.34	5192	1412	2172
12	095	0167.16	Upper	No	141.61	\$85,700	\$121,360	\$100,230	5670	50.41	2858	1712	2016
12	095	0167.17	Middle	No	108.32	\$85,700	\$92,830	\$76,667	3670	70.35	2582	988	1246
12	095	0167.23	Middle	No	87.90	\$85,700	\$75,330	\$62,212	5085	68.50	3483	1205	1632
12	095	0167.24	Middle	No	85.66	\$85,700	\$73,411	\$60,632	6464	78.88	5099	991	1295
12	095	0167.28	Middle	No	102.81	\$85,700	\$88,108	\$72,768	5198	48.27	2509	1673	2063
12	095	0167.31	Middle	No	108.17	\$85,700	\$92,702	\$76,563	7553	60.23	4549	734	1014
12	095	0167.33	Moderate	No	78.64	\$85,700	\$67,394	\$55,658	5844	66.99	3915	1857	2179
12	095	0167.35	Upper	No	170.50	\$85,700	\$146,119	\$120,673	12745	70.37	8969	2202	2744
12	095	0167.36	Upper	No	122.60	\$85,700	\$105,068	\$86,771	13392	63.15	8457	1952	3160
12	095	0167.37	Upper	No	126.84	\$85,700	\$108,702	\$89,774	9685	60.67	5876	1832	1996
12	095	0167.38	Moderate	No	64.20	\$85,700	\$55,019	\$45,438	3812	75.58	2881	699	1259
12	095	0167.39	Low	No	48.93	\$85,700	\$41,933	\$34,636	6753	84.90	5733	559	783
12	095	0167.40	Middle	No	105.79	\$85,700	\$90,662	\$74,877	3592	66.09	2374	544	1001
12	095	0167.41	Middle	No	111.41	\$85,700	\$95,478	\$78,851	3464	65.13	2256	341	208
12	095	0167.42	Moderate	No	66.20	\$85,700	\$56,733	\$46,858	4411	72.00	3176	221	399
12	095	0167.43	Upper	No	149.14	\$85,700	\$127,813	\$105,559	6040	66.85	4038	1385	1718
12	095	0167.44	Low	No	48.49	\$85,700	\$41,556	\$34,325	5168	69.49	3591	629	1091
12	095	0167.45	Middle	No	81.00	\$85,700	\$69,417	\$57,333	5361	63.12	3384	897	1363
12	095	0167.46	Upper	No	157.68	\$85,700	\$135,132	\$111,602	4276	48.78	2086	1628	1880
12	095	0167.47	Upper	No	204.74	\$85,700	\$175,462	\$144,903	5601	44.28	2480	1448	1495
12	095	0167.48	Upper	No	152.88	\$85,700	\$131,018	\$108,205	6010	65.44	3933	1532	1975

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12	095	0167.49	Upper	No	139.95	\$85,700	\$119,937	\$99,053	6277	60.33	3787	1223	1451
12	095	0167.50	Upper	No	131.55	\$85,700	\$112,738	\$93,108	12194	56.63	6906	2958	4099
12	095	0167.51	Upper	No	136.60	\$85,700	\$117,066	\$96,684	6423	67.85	4358	1477	1719
12	095	0167.52	Upper	No	130.64	\$85,700	\$111,958	\$92,461	4454	55.01	2450	1263	1493
12	095	0167.53	Middle	No	88.27	\$85,700	\$75,647	\$62,474	7673	73.24	5620	1069	2541
12	095	0167.54	Moderate	No	68.93	\$85,700	\$59,073	\$48,787	4118	78.12	3217	590	1660
12	095	0167.55	Upper	No	123.76	\$85,700	\$106,062	\$87,596	6722	72.85	4897	1766	1883
12	095	0167.56	Upper	No	135.99	\$85,700	\$116,543	\$96,250	2700	72.22	1950	747	1265
12	095	0168.02	Upper	No	158.10	\$85,700	\$135,492	\$111,896	18656	57.28	10686	3253	5305
12	095	0168.03	Middle	No	85.96	\$85,700	\$73,668	\$60,840	2860	77.48	2216	686	1010
12	095	0168.04	Middle	No	110.45	\$85,700	\$94,656	\$78,173	6333	78.54	4974	964	1814
12	095	0168.08	Middle	No	103.78	\$85,700	\$88,939	\$73,451	1992	78.31	1560	560	770
12	095	0168.09	Moderate	No	58.51	\$85,700	\$50,143	\$41,410	7969	86.06	6858	1209	2390
12	095	0168.10	Upper	No	121.93	\$85,700	\$104,494	\$86,297	11406	84.69	9660	1789	2979
12	095	0168.11	Middle	No	87.34	\$85,700	\$74,850	\$61,817	11616	84.90	9862	2253	3734
12	095	0168.12	Middle	No	83.40	\$85,700	\$71,474	\$59,026	6331	87.57	5544	1680	2044
12	095	0168.13	Middle	No	91.08	\$85,700	\$78,056	\$64,464	3203	92.13	2951	268	571
12	095	0168.14	Moderate	No	66.96	\$85,700	\$57,385	\$47,393	5295	90.20	4776	484	1625
12	095	0169.02	Moderate	No	64.64	\$85,700	\$55,396	\$45,750	5845	87.10	5091	815	1318
12	095	0169.04	Moderate	No	57.73	\$85,700	\$49,475	\$40,861	4722	94.56	4465	565	864
12	095	0169.06	Low	No	48.79	\$85,700	\$41,813	\$34,531	4632	92.83	4300	65	483
12	095	0169.07	Low	No	46.90	\$85,700	\$40,193	\$33,194	7296	94.16	6870	193	625
12	095	0169.08	Middle	No	87.45	\$85,700	\$74,945	\$61,897	2829	83.07	2350	218	489
12	095	0169.09	Moderate	No	58.40	\$85,700	\$50,049	\$41,333	5171	93.23	4821	182	404
12	095	0169.10	Moderate	No	60.59	\$85,700	\$51,926	\$42,887	1429	88.94	1271	148	310
12	095	0169.11	Unknown	No	0.00	\$85,700	\$0	\$0	8349	86.09	7188	0	268
12	095	0170.01	Moderate	No	69.89	\$85,700	\$59,896	\$49,464	4966	73.60	3655	637	1142
12	095	0170.04	Middle	No	85.88	\$85,700	\$73,599	\$60,781	5904	56.30	3324	1371	2163

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12	095	0170.06	Middle	No	107.86	\$85,700	\$92,436	\$76,339	4513	77.04	3477	439	795
12	095	0170.11	Moderate	No	66.48	\$85,700	\$56,973	\$47,054	5884	79.15	4657	1241	1795
12	095	0170.12	Upper	No	130.23	\$85,700	\$111,607	\$92,171	2992	66.14	1979	778	999
12	095	0170.13	Moderate	No	66.56	\$85,700	\$57,042	\$47,108	7512	75.37	5662	1723	2694
12	095	0170.15	Middle	No	117.21	\$85,700	\$100,449	\$82,961	8347	63.70	5317	1326	2120
12	095	0170.18	Moderate	No	61.67	\$85,700	\$52,851	\$43,650	6605	81.70	5396	491	815
12	095	0170.19	Moderate	No	67.82	\$85,700	\$58,122	\$48,000	4297	80.10	3442	920	1319
12	095	0170.20	Middle	No	94.84	\$85,700	\$81,278	\$67,123	7005	72.21	5058	732	614
12	095	0170.21	Middle	No	112.52	\$85,700	\$96,430	\$79,637	6191	76.34	4726	1116	1473
12	095	0170.22	Moderate	No	66.48	\$85,700	\$56,973	\$47,054	10303	68.36	7043	88	401
12	095	0170.23	Moderate	No	69.32	\$85,700	\$59,407	\$49,067	2309	56.00	1293	54	55
12	095	0170.24	Low	No	47.98	\$85,700	\$41,119	\$33,958	2929	47.42	1389	0	106
12	095	0170.25	Upper	No	139.91	\$85,700	\$119,903	\$99,025	4080	63.21	2579	894	1151
12	095	0170.26	Upper	No	128.43	\$85,700	\$110,065	\$90,902	3941	41.13	1621	1119	1742
12	095	0171.08	Upper	No	155.66	\$85,700	\$133,401	\$110,170	10418	45.86	4778	2224	2741
12	095	0171.09	Upper	No	169.72	\$85,700	\$145,450	\$120,123	6170	32.77	2022	1677	2249
12	095	0171.10	Middle	No	116.47	\$85,700	\$99,815	\$82,432	7170	53.71	3851	710	1317
12	095	0171.11	Upper	No	156.56	\$85,700	\$134,172	\$110,808	18071	43.76	7908	2709	3298
12	095	0171.12	Upper	No	134.23	\$85,700	\$115,035	\$95,006	16383	50.84	8329	3321	4786
12	095	0171.13	Upper	No	183.30	\$85,700	\$157,088	\$129,731	14094	39.95	5631	3039	3976
12	095	0171.14	Upper	No	161.24	\$85,700	\$138,183	\$114,118	11635	45.70	5317	1995	2485
12	095	0171.15	Upper	No	173.64	\$85,700	\$148,809	\$122,899	4801	38.93	1869	1095	1419
12	095	0171.16	Upper	No	217.31	\$85,700	\$186,235	\$153,804	9265	48.03	4450	1819	1995
12	095	0171.17	Upper	No	139.85	\$85,700	\$119,851	\$98,978	7861	48.43	3807	1995	2508
12	095	0171.18	Upper	No	136.16	\$85,700	\$116,689	\$96,369	5459	49.72	2714	996	1869
12	095	0171.19	Upper	No	168.21	\$85,700	\$144,156	\$119,053	2863	31.47	901	734	925
12	095	0171.20	Upper	No	190.45	\$85,700	\$163,216	\$134,795	6406	42.27	2708	1834	2569
12	095	0171.21	Unknown	No	0.00	\$85,700	\$0	\$0	2820	49.96	1409	755	1118
12	095	0171.22	Upper	No	226.51	\$85,700	\$194,119	\$160,313	3484	49.11	1711	605	933

\* Will automatically be included in the 2024 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
12	095	0171.23	Upper	No	228.14	\$85,700	\$195,516	\$161,467	4958	57.22	2837	978	1447
12	095	0172.00	Upper	No	149.78	\$85,700	\$128,361	\$106,010	4957	38.75	1921	1071	1674
12	095	0173.01	Middle	No	99.78	\$85,700	\$85,511	\$70,625	2935	34.96	1026	701	889
12	095	0173.02	Moderate	No	72.49	\$85,700	\$62,124	\$51,309	7356	54.06	3977	1471	2747
12	095	0174.01	Upper	No	129.97	\$85,700	\$111,384	\$91,990	7586	38.10	2890	1906	2378
12	095	0174.02	Moderate	No	59.47	\$85,700	\$50,966	\$42,094	5235	77.19	4041	711	1750
12	095	0175.03	Moderate	No	59.18	\$85,700	\$50,717	\$41,885	6068	65.61	3981	1287	1658
12	095	0175.04	Middle	No	83.55	\$85,700	\$71,602	\$59,138	8525	65.43	5578	2450	3322
12	095	0175.05	Moderate	No	74.68	\$85,700	\$64,001	\$52,859	5020	84.46	4240	960	1309
12	095	0175.06	Upper	No	138.79	\$85,700	\$118,943	\$98,228	12043	66.74	8037	2830	4284
12	095	0176.00	Moderate	No	56.22	\$85,700	\$48,181	\$39,794	4921	86.93	4278	916	1702
12	095	0177.01	Upper	No	125.39	\$85,700	\$107,459	\$88,750	5622	67.68	3805	1368	1904
12	095	0177.02	Middle	No	113.67	\$85,700	\$97,415	\$80,455	2433	39.29	956	637	853
12	095	0177.03	Moderate	No	79.83	\$85,700	\$68,414	\$56,500	4967	64.32	3195	995	1616
12	095	0178.05	Middle	No	117.14	\$85,700	\$100,389	\$82,911	3067	41.60	1276	878	1163
12	095	0178.06	Upper	No	131.72	\$85,700	\$112,884	\$93,226	5103	38.74	1977	1635	1918
12	095	0178.07	Middle	No	85.68	\$85,700	\$73,428	\$60,640	4119	65.16	2684	903	1368
12	095	0178.08	Upper	No	138.86	\$85,700	\$119,003	\$98,281	3799	34.32	1304	1278	1536
12	095	0178.09	Middle	No	106.98	\$85,700	\$91,682	\$75,719	3474	65.26	2267	612	837
12	095	0178.10	Middle	No	118.15	\$85,700	\$101,255	\$83,625	6244	67.02	4185	1207	1947
12	095	0178.11	Upper	No	168.02	\$85,700	\$143,993	\$118,917	4881	54.78	2674	700	1003
12	095	0178.12	Middle	No	114.34	\$85,700	\$97,989	\$80,930	8137	53.55	4357	2334	3241
12	095	0178.13	Upper	No	241.08	\$85,700	\$206,606	\$170,625	2328	46.31	1078	467	657
12	095	0178.14	Upper	No	145.29	\$85,700	\$124,514	\$102,833	6387	45.01	2875	1762	2277
12	095	0179.01	Upper	No	179.37	\$85,700	\$153,720	\$126,953	4403	50.69	2232	1271	1538
12	095	0179.02	Middle	No	109.30	\$85,700	\$93,670	\$77,361	7349	39.49	2902	2650	3360
12	095	0180.00	Moderate	No	56.94	\$85,700	\$48,798	\$40,300	3659	67.81	2481	440	1029
12	095	0181.00	Middle	No	92.50	\$85,700	\$79,273	\$65,473	3244	47.01	1525	767	1120

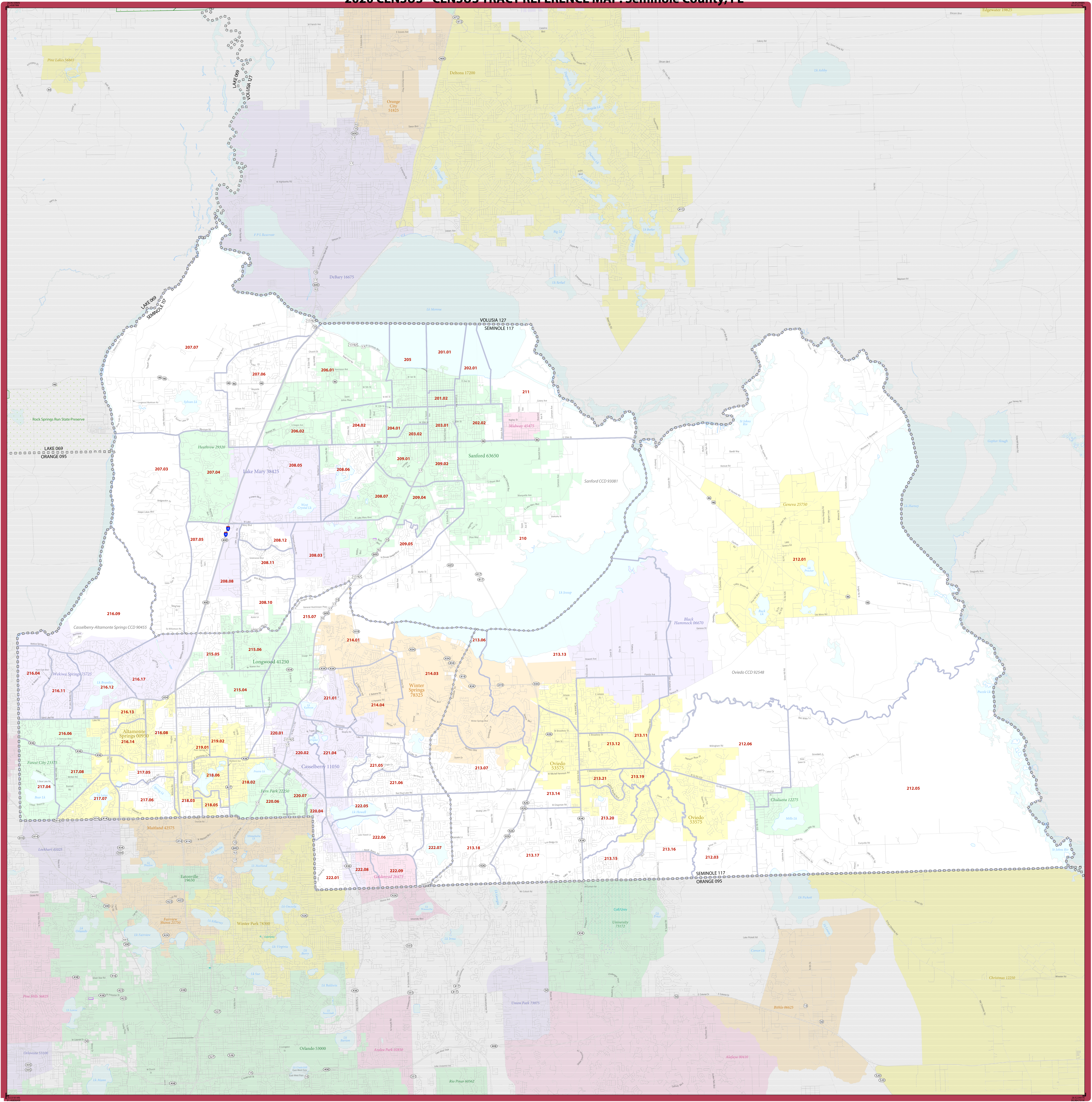
\* Will automatically be included in the 2024 Distressed or Underserved Tract List



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
12	095	0182.01	Upper	No	219.31	\$85,700	\$187,949	\$155,221	4952	31.50	1560	929	1340
12	095	0182.02	Upper	No	213.96	\$85,700	\$183,364	\$151,429	4341	32.62	1416	485	885
12	095	0182.03	Middle	No	82.15	\$85,700	\$70,403	\$58,142	1937	69.59	1348	293	695
12	095	0182.04	Middle	No	91.95	\$85,700	\$78,801	\$65,080	2296	56.71	1302	309	644
12	095	0183.00	Moderate	No	68.88	\$85,700	\$59,030	\$48,750	3149	81.14	2555	476	960
12	095	0184.00	Middle	No	86.54	\$85,700	\$74,165	\$61,250	2381	49.48	1178	529	893
12	095	0185.00	Middle	No	84.01	\$85,700	\$71,997	\$59,461	3684	78.56	2894	454	1033
12	095	0187.00	Moderate	No	68.91	\$85,700	\$59,056	\$48,775	5749	77.14	4435	885	1402
12	095	0188.00	Upper	No	201.55	\$85,700	\$172,728	\$142,647	4676	35.65	1667	469	1133
12	095	0189.01	Moderate	No	56.22	\$85,700	\$48,181	\$39,792	5730	72.64	4162	410	748
12	095	0189.02	Upper	No	131.50	\$85,700	\$112,696	\$93,068	4922	43.42	2137	695	19
12	095	0190.00	Middle	No	116.72	\$85,700	\$100,029	\$82,614	3621	29.49	1068	1097	1715
12	095	9900.00	Unknown	No	0.00	\$85,700	\$0	\$0	0	0.00	0	0	0

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# 2020 CENSUS - CENSUS TRACT REFERENCE MAP: Seminole County, FL



### LEGEND

SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE	SYMBOL DESCRIPTION	SYMBOL	LABEL STYLE
International	◆◆◆◆◆◆	CANADA	Incorporated Place 1,2	■	Davis 18100
Federal American Indian Reservation	■■■■■■■■	L'ANSE RESVN 1880	Census Designated Place (CDP) 3	■	Incline Village 35100
Oil Reservation Trust Land	■■■■■■■■	TI880	Census Tract 3	■	33.07
State American Indian Reservation	■■■■■■■■	Tama Resvn 9400	DESCRIPTION	SYMBOL	DESCRIPTION
Alaska Native Regional Corporation	▲▲▲▲▲▲	NANA ANRC 52120	Water Body	■	Placeholder Lake
State (or statistically equivalent entity)		NEW YORK 36	College or University	■	College
County (or statistically equivalent entity)	□□□□□	ERIE 029	Military	■	Placeholder
Minor Civil Division (MCD) 3	○ ○ ○ ○ ○	Bristol town 07485	Prison or Juvenile Detention Center	■	Placeholder
Census County Division (CCD), Census Subarea (CSA), or Unincorporated Territory (UT)	○ ○ ○ ○ ○	Hanna CCD 91650	Natural or State Park, Forest, or Recreation Area	■	Placeholder
Consolidated City	○ ○ ○ ○ ○	MILLFORD 47500	Outside Subject Area	■	Placeholder
			Inset Area	■	A1

Where international, state, county, and/or MCD/CCD boundaries coincide, the map shows the boundary symbol for only the highest-ranking of these boundaries.

Geographic area names are followed by either their FIPS or census code.

1. A "\*" following an MCD name denotes a false MCD. A "\*" following a place name indicates that a false MCD exists with the same name and FIPS code as the place; the false MCD label is not shown.

2. Place label color corresponds to the place fill color.

3. Census tracts are identified by an up to four-digit integer number and may have an optional two-digit suffix; for example 23 or 1457.02. The census tract codes consist of six digits with an implied decimal between the fourth and fifth digit corresponding to the basic census tract number, but with leading zeros, and trailing zeros for census tracts without a suffix. The tract number examples above would have codes of 002300 and 145702, respectively.

Due to space limitations, some road names, along with other feature and geography names on the map, may not be shown.

Scale: 1:15,000

Projection: Albers Equal Area Conic  
Datum: NAD 83  
Spheroid: GRS 80  
1st Standard Parallel: 22 29 46  
2nd Standard Parallel: 29 53 54  
Central Meridian: -83 48 15  
Latitude of Projection Origin: 24 23 45  
False Easting: 0  
False Northing: 0

U.S. DEPARTMENT OF COMMERCE U.S. Census Bureau

Map Created by Geography Division, January 09, 2021

Geographic Vintage: 2020 Census (reference date: January 1, 2020)  
Data Source: U.S. Census Bureau's MAJ/TIGER database (TAB20)  
Map Created by Geography Division, January 09, 2021

Sheet 1 of 1 PARENT sheets  
Total Sheets: 1 (Index 0; Parent 1; Inset 0)

NAME: Seminole County (117)  
ENTITY TYPE: County or statistically equivalent entity  
ST: Florida (12)

2020 CENSUS TRACT REF MAP (PARENT)  
Sheet ID: 249612117001

2023 FFIEC Census Report - Summary Census Demographic Information

State: 12 - FLORIDA (FL)

County: 117 - SEMINOLE COUNTY



State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
12	117	0201.01	Moderate	No	73.29	\$85,700	\$62,810	\$51,875	1291	42.76	552	102	304
12	117	0201.02	Middle	No	108.26	\$85,700	\$92,779	\$76,625	1218	43.43	529	355	565
12	117	0202.01	Moderate	No	73.82	\$85,700	\$63,264	\$52,250	1939	55.91	1084	467	720
12	117	0202.02	Middle	No	102.59	\$85,700	\$87,920	\$72,614	4500	69.87	3144	921	1530
12	117	0203.01	Middle	No	92.93	\$85,700	\$79,641	\$65,776	2394	34.80	833	701	969
12	117	0203.02	Moderate	No	60.78	\$85,700	\$52,088	\$43,021	2021	72.44	1464	391	573
12	117	0204.01	Moderate	No	76.23	\$85,700	\$65,329	\$53,958	1661	84.35	1401	436	728
12	117	0204.02	Middle	No	102.29	\$85,700	\$87,663	\$72,401	3109	60.05	1867	977	1300
12	117	0205.00	Low	No	29.43	\$85,700	\$25,222	\$20,833	2778	82.15	2282	298	649
12	117	0206.01	Middle	No	89.36	\$85,700	\$76,582	\$63,246	8592	68.98	5927	1420	1873
12	117	0206.02	Middle	No	106.53	\$85,700	\$91,296	\$75,402	6365	53.70	3418	1322	1919
12	117	0207.03	Upper	No	291.69	\$85,700	\$249,978	\$206,447	6567	30.07	1975	1742	1980
12	117	0207.04	Upper	No	159.34	\$85,700	\$136,554	\$112,776	7645	40.88	3125	2197	2445
12	117	0207.05	Upper	No	126.63	\$85,700	\$108,522	\$89,625	3579	33.05	1183	791	877
12	117	0207.06	Upper	No	159.44	\$85,700	\$136,640	\$112,849	9991	47.06	4702	2636	3007
12	117	0207.07	Upper	No	182.96	\$85,700	\$156,797	\$129,492	8625	33.63	2901	2358	2841
12	117	0208.03	Middle	No	117.42	\$85,700	\$100,629	\$83,109	7142	29.61	2115	1881	2243
12	117	0208.05	Upper	No	172.20	\$85,700	\$147,575	\$121,875	8427	36.53	3078	2541	3343
12	117	0208.06	Upper	No	142.08	\$85,700	\$121,763	\$100,557	6441	50.82	3273	1762	2146
12	117	0208.07	Moderate	No	76.03	\$85,700	\$65,158	\$53,812	6985	54.19	3785	1515	2134
12	117	0208.08	Upper	No	156.30	\$85,700	\$133,949	\$110,625	3964	35.80	1419	1237	1471
12	117	0208.10	Upper	No	166.79	\$85,700	\$142,939	\$118,050	3906	37.69	1472	1008	1349
12	117	0208.11	Upper	No	129.14	\$85,700	\$110,673	\$91,399	6784	43.85	2975	1307	1994
12	117	0208.12	Middle	No	102.59	\$85,700	\$87,920	\$72,614	4391	55.66	2444	676	712
12	117	0209.01	Moderate	No	65.88	\$85,700	\$56,459	\$46,628	4572	73.73	3371	444	942
12	117	0209.02	Moderate	No	57.09	\$85,700	\$48,926	\$40,406	2683	53.82	1444	634	1231

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12	117	0209.04	Moderate	No	62.67	\$85,700	\$53,708	\$44,356	6744	66.86	4509	1118	1725
12	117	0209.05	Middle	No	89.59	\$85,700	\$76,779	\$63,413	4415	49.24	2174	1064	1357
12	117	0210.00	Upper	No	138.09	\$85,700	\$118,343	\$97,733	5793	51.96	3010	1208	1710
12	117	0211.00	Middle	No	99.17	\$85,700	\$84,989	\$70,188	4161	75.25	3131	912	1334
12	117	0212.01	Upper	No	148.50	\$85,700	\$127,265	\$105,103	6863	17.41	1195	2126	2627
12	117	0212.03	Upper	No	172.65	\$85,700	\$147,961	\$122,197	6167	33.74	2081	1616	1948
12	117	0212.05	Upper	No	125.59	\$85,700	\$107,631	\$88,889	4525	21.59	977	1342	1402
12	117	0212.06	Upper	No	185.09	\$85,700	\$158,622	\$131,000	5849	36.18	2116	1424	1719
12	117	0213.06	Middle	No	107.32	\$85,700	\$91,973	\$75,956	8821	26.38	2327	3302	3613
12	117	0213.07	Upper	No	177.92	\$85,700	\$152,477	\$125,924	7536	35.30	2660	2356	2807
12	117	0213.11	Upper	No	164.57	\$85,700	\$141,036	\$116,477	5750	41.65	2395	1492	1945
12	117	0213.12	Upper	No	149.80	\$85,700	\$128,379	\$106,021	5613	42.79	2402	1370	1467
12	117	0213.13	Upper	No	190.67	\$85,700	\$163,404	\$134,947	7948	29.67	2358	2318	2618
12	117	0213.14	Upper	No	124.08	\$85,700	\$106,337	\$87,819	5423	41.27	2238	1035	1681
12	117	0213.15	Upper	No	138.42	\$85,700	\$118,626	\$97,969	7870	35.43	2788	1775	2195
12	117	0213.16	Upper	No	157.19	\$85,700	\$134,712	\$111,250	4619	42.43	1960	975	1315
12	117	0213.17	Upper	No	153.42	\$85,700	\$131,481	\$108,583	8418	39.56	3330	1999	2302
12	117	0213.18	Upper	No	121.84	\$85,700	\$104,417	\$86,235	8620	48.31	4164	1734	2281
12	117	0213.19	Upper	No	138.15	\$85,700	\$118,395	\$97,778	1680	40.77	685	448	545
12	117	0213.20	Upper	No	124.45	\$85,700	\$106,654	\$88,081	6987	39.65	2770	2227	2609
12	117	0213.21	Middle	No	97.92	\$85,700	\$83,917	\$69,302	2928	46.99	1376	449	762
12	117	0214.01	Middle	No	108.33	\$85,700	\$92,839	\$76,670	8500	50.24	4270	1969	2725
12	117	0214.03	Upper	No	170.14	\$85,700	\$145,810	\$120,417	9112	31.67	2886	2684	3217
12	117	0214.04	Middle	No	98.67	\$85,700	\$84,560	\$69,837	7673	39.97	3067	2963	3453
12	117	0215.04	Upper	No	153.43	\$85,700	\$131,490	\$108,594	3150	22.95	723	893	1059
12	117	0215.05	Upper	No	123.97	\$85,700	\$106,242	\$87,740	4541	29.99	1362	1538	1719
12	117	0215.06	Upper	No	123.04	\$85,700	\$105,445	\$87,083	3545	34.75	1232	1108	1352
12	117	0215.07	Middle	No	92.31	\$85,700	\$79,110	\$65,337	7369	44.99	3315	1539	2910
12	117	0216.04	Upper	No	139.56	\$85,700	\$119,603	\$98,776	4162	24.36	1014	1628	1720

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12	117	0216.06	Moderate	No	79.47	\$85,700	\$68,106	\$56,250	7198	57.24	4120	1319	1791
12	117	0216.08	Middle	No	85.19	\$85,700	\$73,008	\$60,297	6004	54.86	3294	1456	2035
12	117	0216.09	Upper	No	172.04	\$85,700	\$147,438	\$121,765	3287	21.60	710	1042	1137
12	117	0216.11	Upper	No	127.66	\$85,700	\$109,405	\$90,357	4657	24.11	1123	1477	1655
12	117	0216.12	Upper	No	131.61	\$85,700	\$112,790	\$93,152	4377	25.25	1105	1390	1679
12	117	0216.13	Middle	No	84.36	\$85,700	\$72,297	\$59,712	3336	57.13	1906	397	616
12	117	0216.14	Middle	No	105.87	\$85,700	\$90,731	\$74,934	5445	51.96	2829	1432	1719
12	117	0216.17	Upper	No	129.67	\$85,700	\$111,127	\$91,775	7224	31.67	2288	1696	2010
12	117	0217.04	Middle	No	92.76	\$85,700	\$79,495	\$65,651	4708	41.16	1938	1350	1799
12	117	0217.05	Middle	No	82.81	\$85,700	\$70,968	\$58,608	5918	70.45	4169	816	1378
12	117	0217.06	Middle	No	114.54	\$85,700	\$98,161	\$81,071	4243	47.87	2031	912	1298
12	117	0217.07	Middle	No	108.69	\$85,700	\$93,147	\$76,930	6796	54.68	3716	1126	1141
12	117	0217.08	Upper	No	129.51	\$85,700	\$110,990	\$91,663	6364	50.41	3208	1232	1621
12	117	0218.02	Moderate	No	71.19	\$85,700	\$61,010	\$50,391	4726	45.47	2149	737	1535
12	117	0218.03	Middle	No	81.74	\$85,700	\$70,051	\$57,857	3568	59.08	2108	528	1429
12	117	0218.05	Upper	No	140.79	\$85,700	\$120,657	\$99,643	1566	20.18	316	675	738
12	117	0218.06	Middle	No	97.79	\$85,700	\$83,806	\$69,214	5631	41.84	2356	1619	1385
12	117	0219.01	Middle	No	108.55	\$85,700	\$93,027	\$76,831	5141	44.95	2311	977	1260
12	117	0219.02	Middle	No	87.42	\$85,700	\$74,919	\$61,875	4327	53.62	2320	1405	1865
12	117	0220.01	Moderate	No	58.28	\$85,700	\$49,946	\$41,250	2529	63.90	1616	519	966
12	117	0220.02	Middle	No	101.90	\$85,700	\$87,328	\$72,120	5103	50.24	2564	1137	1384
12	117	0220.04	Middle	No	101.42	\$85,700	\$86,917	\$71,786	2332	41.68	972	665	708
12	117	0220.06	Middle	No	94.42	\$85,700	\$80,918	\$66,825	3522	39.72	1399	909	1231
12	117	0220.07	Middle	No	92.43	\$85,700	\$79,213	\$65,417	4067	48.14	1958	963	1184
12	117	0221.01	Moderate	No	77.59	\$85,700	\$66,495	\$54,919	7254	47.86	3472	2059	2702
12	117	0221.04	Middle	No	83.87	\$85,700	\$71,877	\$59,364	6734	40.41	2721	2172	2628
12	117	0221.05	Upper	No	121.01	\$85,700	\$103,706	\$85,647	3630	33.09	1201	1045	1386
12	117	0221.06	Middle	No	105.29	\$85,700	\$90,234	\$74,519	7943	41.14	3268	2277	2841

\* Will automatically be included in the 2024 Distressed or Underserved Tract List

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2023 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2023 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
12	117	0222.01	Middle	No	118.54	\$85,700	\$101,589	\$83,901	5888	45.92	2704	1272	1951
12	117	0222.05	Upper	No	128.37	\$85,700	\$110,013	\$90,855	3588	36.23	1300	1130	1221
12	117	0222.06	Middle	No	101.87	\$85,700	\$87,303	\$72,098	6535	43.24	2826	1393	1936
12	117	0222.07	Upper	No	135.87	\$85,700	\$116,441	\$96,167	6144	42.14	2589	1375	2094
12	117	0222.08	Middle	No	87.77	\$85,700	\$75,219	\$62,120	4508	50.11	2259	789	1489
12	117	0222.09	Middle	No	114.74	\$85,700	\$98,332	\$81,207	4211	39.42	1660	1189	1595

\* Will automatically be included in the 2024 Distressed or Underserved Tract List

# WINTER PARK NATIONAL BANK

## CRA PUBLIC FILE

### Loan : Deposit Ratio

<u>Date</u>	<u>Loans (\$)</u>	<u>Deposits (\$)</u>	<u>Loan : Deposit Ratio</u>
9/30/2017	17,473,603	31,084,058	56.21%
12/31/2017	47,194,181	79,743,073	59.18%
3/31/2018	68,662,973	106,684,120	64.36%
6/30/2018	92,433,954	152,444,578	60.63%
9/30/2018	113,053,932	190,341,039	59.40%
12/31/2018	138,652,817	208,277,360	66.57%
3/31/2019	152,346,227	234,458,973	64.98%
6/30/2019	174,057,110	297,030,617	58.60%
9/30/2019	181,165,225	297,009,519	61.00%
12/31/2019	197,693,800	306,134,057	64.58%
3/31/2020	208,201,459	354,948,287	58.66%
6/30/2020	228,722,729	398,652,207	57.37%
9/30/2020	226,592,705	443,572,414	51.08%
12/31/2020	247,935,177	440,116,442	56.33%
3/31/2021	263,539,456	507,261,344	51.95%
6/30/2021	259,282,777	522,341,080	49.64%
9/30/2021	275,070,067	542,057,170	50.75%
12/31/2021	299,792,897	722,732,722	41.48%
3/31/2022	291,236,025	681,128,407	42.76%
6/30/2022	312,771,799	673,693,284	46.43%
9/30/2022	355,441,285	667,524,904	53.25%
12/31/2022	377,329,486	667,627,439	56.52%
3/31/2023	389,780,256	674,500,753	57.79%
6/30/2023	391,376,072	661,165,271	59.19%
9/30/2023	392,957,160	659,997,026	59.54%
12/31/2023	430,028,253	668,199,827	64.36%

**WINTER PARK NATIONAL BANK**

**CRA PUBLIC FILE**

**MOST RECENT CRA PERFORMANCE EVALUATION**

May 8, 2023

Office of the Comptroller of the Currency  
Community Reinvestment Act Performance Evaluation



## **PUBLIC DISCLOSURE**

May 8, 2023

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

Winter Park National Bank  
**Charter Number 25142**

201 N. New York Avenue, Suite 100  
Winter Park, FL 32789

Office of the Comptroller of the Currency

Tampa Field Office  
4042 Park Oaks Blvd, Suite 240  
Tampa, FL 33610

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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# INTERMEDIATE SMALL BANK

## Overall CRA Rating

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

**The lending test is rated: Satisfactory.**

**The community development test is rated: Satisfactory.**

The major factors that support this rating include:

The Lending Test rating is based on:

- Given the bank's size, capacity and other performance context factors, the lending test rating is based on a reasonable loan-to-deposit ratio, a substantial majority of loans originated in the bank's assessment area, excellent distribution of loans in low- and moderate-income geographies, and a reasonable distribution of loans among businesses of different sizes.

The Community Development Test rating is based on:

- The bank exhibits adequate responsiveness to community development needs through community development loans, qualified investments, and community development services, considering the bank's capacity, community needs and the availability of opportunities for community development in the bank's assessment area.

## Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment area, the bank's loan-to-deposit ratio is reasonable.

The bank's level of lending, as reflected in the quarterly average loan-to-deposit (LTD) ratio as depicted in the table below, is reasonable given the bank's size and performance context factors. The bank's average LTD ratio since the preceding CRA evaluation (nine quarters starting in the December 31, 2019 through December 31, 2021), was 53.5 percent, ranging from a high of 64.6 percent in the fourth quarter of 2019 to a low of 41.5 percent in the fourth quarter of 2021. For the same period, WPNB's ratio was lower than the 72.5 percent average LTD ratio of eight similarly situated community banks with branch locations in or near the bank's assessment area. During 2020 and 2021, WPNB experienced significant increases in deposits associated with customers who received Small Business Administration (SBA) Paycheck Participation Program (PPP) loans, which resulted in a decline in the bank's LTD ratio. This increase in deposits negatively impacted the bank's LTD over the evaluation period.

# INTERMEDIATE SMALL BANK

BANK NAME	Total Assets (000s)*	Quarterly Average LTD Ratio (%)
Winter Park National Bank	797,240	53.5
Commerce Bank & Trust	159,803	74.1
First Colony Bank of Florida	314,121	68.5
The First National Bank of Mount Dora	373,897	40.0
Intracoastal Bank	524,706	66.7
One Florida Bank	1,370,119	81.7
Cogent Bank	1,076,177	101.8
Mainstreet Community Bank of Florida	769,519	72.4
Sunrise of Cocoa Beach	373,745	75.0

\*As of 12/31/2021

## Lending in Assessment Area

A substantial majority of the bank's loans are inside its assessment area.

The bank originated and purchased 93.3 percent of its total loans inside the bank's assessment area (AA) during the evaluation period. This analysis is performed at the bank, rather than the AA level. The 56 loans made inside the AA were factored into the lending test.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Business Loans	56	93.3	4	6.7	60	23,063	89.8	2,623	10.2	25,686

## Description of Institution

Winter Park National Bank (WPNB) is a locally owned, intrastate community bank located in Winter Park, Florida. The bank was chartered on August 1, 2017 and until recently operated out of the one office. The bank opened an additional office in Longwood, Florida on August 1, 2022.

As of December 31, 2022, the bank reported total assets of \$714 million and tier one capital of \$51.6 million. For the same period, net loans of \$377.3 million accounted for 52.8 percent of total assets. During the evaluation period, business loans were the primary loan product representing 71.0 percent of the total loan



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portfolio with the remaining 29.0 percent secured by residential real estate, mainly home equity lines of credit loans.

The bank offers an array of loan products and services typical for community banks. Banking services include debit cards, online and mobile banking at no additional cost. The bank does not have automated teller machines (ATMs) at the bank branches; however, customers can use Publix ATMs to access funds at no charge. Both office locations have a drive-thru facility.

In response to COVID-19, SBA PPP loans under the CARES Act were offered to small businesses throughout the county. SBA's PPP was designed to maintain and stabilize small businesses during the pandemic. Although not an SBA Lender, WPNB's participation in the first round (2020) and the 2nd round (2021) resulted in originating 292 PPP loans totaling \$41.6 million, which provided much needed funds to support 170 struggling business during the pandemic. Positive consideration for their response to the pandemic is reflected in respective lending analysis and community development performance.

There are no legal, financial, or other factors impeding the bank's ability to help meet the needs of its AA. The bank received a Satisfactory rating in its previous CRA evaluation dated June 8, 2020.

### Scope of the Evaluation

#### Evaluation Period/Products Evaluated

This Performance Evaluation (PE) assesses the bank's record of meeting the credit needs of the community in which it operates. We evaluated the bank's performance under the Intermediate Small Bank Community Reinvestment Act (CRA) procedures, which includes a lending test and a community development (CD) test. The lending test evaluates the bank's record of meeting the credit needs of the AA through its lending activities. The community development test evaluates the bank's responsiveness to community credit needs in its AA with CD loans, qualified investments, and CD services.

The evaluation period for the lending test covers the period from January 1, 2020 through December 31, 2021. The evaluation period for community development loans, investments, and services begins January 1, 2020 through December 31, 2022.

The bank provided a report with data of all loans made during the evaluation period. A total of 765 loans totaling \$450 million were made in 2020 and 2021 of which 76.5 percent was centered in business loans with the remaining consisting of home equity loan products. Based on the loan origination report and WPNB's lending strategy, we determined the primary loan products and focus for the evaluation period is business lending. Our conclusions are based on an analysis of a random sample of business loans originated during the evaluation period. We used this same random sample for all lending performance tests.



# INTERMEDIATE SMALL BANK

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

The bank operates two offices within one assessment area located in the State of Florida. The State of Florida was selected for a full-scope review.

## **Ratings**

The bank's overall rating is based on the lending performance in the Orange and Seminole Counties assessment area.

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

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

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

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

# INTERMEDIATE SMALL BANK

## State Rating

### State of Florida

**CRA rating for the State of Florida<sup>1</sup>: Satisfactory.**

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

**The Community Development Test is rated: Satisfactory.**

The major factors that support this rating include:

- Given the bank's size, capacity and other performance context factors, the lending test rating is based on a reasonable loan-to-deposit ratio, a substantial majority of loans originated in the bank's AA, excellent distribution of loans in low- and moderate-income geographies, and a reasonable distribution of loans among businesses of different sizes.
- The bank exhibits adequate responsiveness to community development needs through community development loans, qualified investments, and community development services, considering the bank's capacity, community needs and the availability of opportunities for community development in the bank's assessment area.

### Description of Institution's Operations in Florida

WPNB operates two full-service branches in the state, one in Winter Park, FL and one in Longwood, FL which recently opened in August 2022. Both offer drive-up facilities but have no ATM access. However, customers are not charged for any ATM cash withdrawals conducted at any Publix Presto ATM locations. The bank offers an array of loan products and services typical for a small community bank. Banking services include alternative banking to include debit card services and online and mobile banking at no cost. The bank provides a variety of lending programs, but generally the primary focus has been in commercial lending.

WPNB's assessment area consists of Orange and Seminole Counties and is part of the Orlando-Kissimmee-Sanford Metropolitan Statistical Area. The bank has delineated as its AA all census tracts (CT) in the counties where the bank offices are located. The AA meets the legal requirements of the CRA and does not arbitrarily exclude any low-and moderate-income geographies.

There is strong competition in the bank's AA for financial services from other local community banks well as regional and larger institutions that have a nationwide footprint. Based on FDIC's June 30, 2021 deposit market share report for the assessment area, WPNB ranks 16<sup>th</sup> out of 37 financial institutions operating in the AA, with a 0.9 percent deposit percent market share. There

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.



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are 372 banking branches in the AA.

As part of this evaluation, the OCC consulted two nonprofit organizations operating in the AA, both economic development organizations, whose mission is to attract new and diversified businesses and retain those existing businesses with assistance and support. Critical credit needs identified by these nonprofits for this evaluation period include assisting small businesses in obtaining seed capital, venture, debt, and equity capital as well as providing financial expertise, especially to those start-ups and young businesses.

## Orange and Seminole Counties

Table A – Demographic Information of the Assessment Area						
Assessment Area: Orange and Seminole Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	293	4.1	27.3	32.4	35.8	0.3
Population by Geography	1,666,385	2.8	25.6	33.3	38.3	0.0
Housing Units by Geography	685,887	3.0	25.9	34.0	37.0	0.0
Owner-Occupied Units by Geography	341,812	1.1	18.3	33.6	47.0	0.0
Occupied Rental Units by Geography	244,767	5.5	35.6	34.1	24.8	0.0
Vacant Units by Geography	99,308	3.6	28.5	35.1	32.8	0.0
Businesses by Geography	273,095	1.4	22.6	32.2	43.8	0.0
Farms by Geography	5,084	1.3	22.1	34.4	42.2	0.0
Family Distribution by Income Level	381,133	21.1	17.0	18.6	43.3	0.0
Household Distribution by Income Level	586,579	22.6	16.5	17.8	43.1	0.0
Median Family Income MSA – 36740 Orlando-Kissimmee-Sanford MSA		\$57,304	Median Housing Value			\$173,015
			Median Gross Rent			\$1,065
			Families Below Poverty Level			12.2%

Source: 2015 ACS Census Data and 2020 D&B Data  
Due to rounding, totals may not equal 100.0  
(\* ) The NA category consists of geographies that have not been assigned an income classification.



## INTERMEDIATE SMALL BANK

According to the 2015 ACS Census Data, the AA consists of 293 CTs, of which 12 (4.1 percent) are low-income, 80 (27.3 percent) are moderate-income, 95 (32.4 percent) are middle-income, 105 (35.9 percent) are upper-income, and one (0.3 percent) has not been assigned an income classification. The percentage of families living below the poverty level is 12.2 percent. Competition for financial services from larger financial institutions is strong in the AA.

The economy during the evaluation period was significantly impacted by the COVID-19 pandemic which started in March 2020. Lockdowns were imposed on certain types of businesses and on April 1, 2020, a stay-at-home order was issued for the entire state. The lockdowns led to many businesses and organizations being closed for varied periods of time. Orlando, being known as the top family vacation spot with global attractions to include Walt Disney World and Universal Orlando, is driven by its heavy reliance on the tourism industry and was the most impacted sector due to the COVID-19 pandemic. The area experienced the highest unemployment rates in the country during 2020 with the month of May unemployment rate peaking at 21.3 percent and averaging 10.2 percent for the year.

According to Moody's Analytics, although the tourism-related leisure and hospitality industry was and continued to be the most impacted sector during the evaluation period due to the pandemic, the area quickly rebounded with the return of domestic leisure travelers, infrastructure construction projects and migration of young skilled workers to support healthcare and other professional and business services jobs. As of December 31, 2021, the U.S. Bureau of Labor Statistics reported the unemployment rate for the Orlando-Kissimmee-Sanford MSA was 3.4 percent which compares favorably to the state and national rates of 3.6 percent and 3.9 percent, respectively. In 2022, unemployment rates continued to decline with a 2.3 percent rate as of December, which is lower than the state rate of 2.7 percent and much lower than the national unemployment rate of 3.5 percent.

The AA is home to a number of key and diverse industry sectors to include Travel & Tourism, Life Sciences and Health Care Resources, Digital Media and Modeling, Simulation & Training Resources. Top employers include Walt Disney World Resort, Advent Health System, Universal Orlando, and Orlando Health.

Affordable housing continues to be a challenge in the AA. Home prices and rents increased significantly during the evaluation period. According to the National Low Income Housing Coalition, the bank's AA ranked second worst in the country when it comes to the affordable housing shortage. It was also reported, rents have risen an average of 30% resulting in record evictions. Refer to Appendix A for a listing of the bank's AA.

# INTERMEDIATE SMALL BANK

## Scope of Evaluation in Florida

The bank operates two offices in one AA (Orange and Seminole Counties) located in the State of Florida. The AA was selected for a full-scope review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Florida is reasonable.

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

The bank exhibits excellent geographic distribution of loans in the state.

#### *Small Loans to Businesses*

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

The bank did not originate loans to businesses located in low-income geographies. However, the opportunities are limited with only 1.4 percent of all small businesses located in low-income census tracts in the AA. The overall distribution of small business loans operating in moderate-income geographies exceeds the percentage of small businesses operating in moderate-income geographies in the AA and the overall aggregate distribution of small businesses reported by lenders required to report these types of loans (Large Bank CRA Data Collection and Reporting).

#### *Lending Gap Analysis*

Loans made inside the AA are factored into the overall lending gap analysis of the geographic distribution of lending by income level of geography. Our review of the geographies that comprise the bank's AA and distribution of lending for small business loans did not reveal any unexplained conspicuous gaps.

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

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses, given the product lines offered by the bank.

#### *Small Loans to Businesses*

## INTERMEDIATE SMALL BANK

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

The proportion of small business loans made in the assessment area was somewhat lower than the proportion of small businesses operating in the assessment area (gross annual revenues of \$1 million or less) and exceeds the aggregate distribution of loans to small businesses operating in Orange and Seminole Counties reported by lenders subject to report these types of loans (Large Bank CRA Data Collection and Reporting).

Due to performance context factors discussed in the Description of Institution's Operations in Florida, the level of performance is considered reasonable as small business lending is very competitive with the high volume of banks in Orange and Seminole Counties all vying for the same small business loans. We also considered WPNB's significant volume of small loans to businesses made through its participation in the SBA Care's Act PPP program in 2020 and 2021. As previously noted, the bank made 292 PPP loans totaling \$41.6 million which provided much needed support for those local small businesses impacted by the pandemic.

### **Responses to Complaints**

There were no CRA related performance complaints received by the OCC or the bank.

### **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in the state of Florida is rated Satisfactory.

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

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area.

### **Number and Amount of Community Development Loans**

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

## INTERMEDIATE SMALL BANK

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Orange and Seminole Counties	3	100.0	1,920	100.0

During the evaluation period (January 1, 2020 through December 31, 2022), WPNB made three (3) loans totaling \$1.92 million in the assessment area. The bank made two CD loans totaling \$920 thousand to support transitional housing for low to moderate income (LMI) individuals who are leaving substance abuse treatment facilities. One loan totaling \$1.0 million supported an organization that provides identify theft prevention programs to LMI senior citizens residing in assisted living facility located in the bank's AA. In addition, although not included in the table above, WPNB helped stabilize the local economy by making PPP loans to businesses that allowed them to retain employees and maintain operations during COVID-19.

### Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Orange & Seminole Counties	0	0.0	23	1.220	23	100.0	1,220	100.0	0	0.0

WPNB made 23 investments totaling \$1.22 million and include a mortgage-backed security totaling \$1.17 million backed by loans to LMI borrowers residing in the bank's assessment area. The remaining 22 investments totaling \$49 thousand consist of donations made to nonprofit organizations serving LMI individuals, families, and at-risk youths by providing those with the most critical needs and basic services, affordable rental housing, youth programs, education for LMI students and legal assistance to low-income and disadvantaged individuals with obtaining legal identification documents needed for employment and residency. One qualifying CD donation went towards supporting a local community center located in a moderate-income geography in which many free services are offered and geared towards LMI individuals, particularly the use of computers and internet access.

### Extent to Which the Bank Provides Community Development Services

During the evaluation period, four staff members, including the CEO conducted an adequate number of CD services consistent with capacity and expertise to conduct such activities. WPNB provided financial expertise totaling 212 hours to five organizations that serve the assessment area. Nonprofit organizations

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

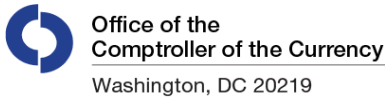


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served during the evaluation period include nonprofit organizations that predominately serve low- and moderate-income persons and broader economic development organization that engages in activities that promotes job creation, including for low-and moderate-income residents. One qualifying CD service activity performed during the COVID pandemic involved distributing personal protective masks to businesses throughout Orange County.



# INTERMEDIATE SMALL BANK

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) 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>	01/01/2020 to 12/31/2022	
<b>Bank Products Reviewed:</b>	Small business loans (01/01/2020 to 12/31/2021) Community development loans, qualified investments, community development services (01/01/2020 to 12/31/2022).	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
n/a		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State of Florida:</b>		
Orange and Seminole Counties	Full-Scope	

# INTERMEDIATE SMALL BANK

## Appendix B: Summary of MMSA and State Ratings

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RATINGS: Winter Park National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
Winter Park National Bank	Satisfactory	Satisfactory	Satisfactory
Florida:	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan.



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This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

## INTERMEDIATE SMALL BANK

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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



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## INTERMEDIATE SMALL BANK

amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

# INTERMEDIATE SMALL BANK

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

**Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

**Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

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

# INTERMEDIATE SMALL BANK

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																	<b>2020-2021</b>		
Assessment Area	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts			
	#	\$	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Orange and Seminole Counties	56	23063	79,738	1.4	0.0	1.6	22.6	33.9	22.2	32.2	17.9	33.2	43.8	48.2	43.0	0.0	0.0	0.0	

Source: 2020 D&B Data; 01/01/2020 - 12/31/2021 Random Sample of Bank Data; 2021 CRA Aggregate Data,

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2020-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Orange and Seminole Counties	56	23,063	100.0	79,738	91.3	66.1	44.9	2.8	30.4	5.9	3.5	

Source: 2020 D&B Data; 01/01/2020 - 12/31/2021 Random Sample of Bank Data; 2021 CRA Aggregate Data

**WINTER PARK NATIONAL BANK**  
**201 N. New York Avenue, Suite 100**  
**Winter Park, FL 32789**

**CRA PUBLIC FILE**  
**COMMUNITY COMMENTS**

Winter Park National Bank is a newly formed bank, opening on August 1, 2017.  
To date, there are currently no written comments from the public to include in the file.