



## **PUBLIC DISCLOSURE**

June 24, 2024

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

Eastern National Bank  
Charter Number: 15748

9700 South Dixie Highway  
Miami, Florida 33156

Office of the Comptroller of the Currency

Miami Office  
9850 N.W. 41<sup>st</sup> Street, Suite 260  
Miami, Florida 33178

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

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## Overall CRA Rating

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

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

The major factors that support this rating include:

- The Lending Test rating is based on the reasonable distribution of loans in low- and moderate-income census tracts and the reasonable distribution of lending among businesses of different sizes throughout the bank's assessment area (AA).
- A substantial majority of the bank's loan originations are within its AA.
- The bank's level of lending, based on the average quarterly loan to deposit (LTD) ratio is reasonable for the evaluation period.
- The bank did not receive any CRA-related complaints during the evaluation period.
- The bank exhibits adequate responsiveness to community development needs 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 areas.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. The bank's quarterly average LTD ratio since the last evaluation period was 71.99 percent. The quarterly average LTD ratio of four similarly situated institutions (SSI) was 76.33 percent, ranging from a high of 93.27 percent to a low of 58.55 percent. The SSIs used in the analysis were all located in Miami-Dade County and are similar in asset size and business strategy.

### Lending in Assessment Area

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

The bank originated and purchased 100 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$(000's)	%	\$	%	
Small Business	41	100.0%	0	0.0%	186	4,650	100.0%	0	0.0%	4,650
<b>Total</b>	<b>41</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>186</b>	<b>4,650</b>	<b>100.0%</b>	<b>0</b>	<b>0.0%</b>	<b>4,650</b>

## Description of Institution

Eastern National Bank (ENB or the bank) is a single-state community bank headquartered in Miami, Florida. The bank is owned by Mercorp N.V., a Curacao corporation, which owns 99 percent of the total outstanding shares of the bank. Mercorp is 100 percent owned by Venezuelan corporation Corpofin C.A. Corpofin is a family-owned business that was seized by the Venezuelan government for unpaid debts in 1994. La Superintendencia de la Instituciones del Sector Bancario (SUDEBAN) is the Venezuelan regulatory authority that appoints the interventor who serves as Corpofin's trustee. The interventor, through control of Corpofin, also controls Mercorp's ownership interests in the bank. SUDEBAN appointed the attorney currently serving as the interventor in 2009. The bank has two wholly owned operating subsidiaries, formed for real estate holdings, and no affiliates. The subsidiary activity is not relevant to this evaluation and such activity does not affect the bank's ability to lend or invest in its community.

The bank has one AA that is MD 33124 Miami-Miami Beach-Kendall, FL or Miami-Dade County. The AA is also part of MSA 33100 Miami-Fort Lauderdale-Palm Beach, FL. ENB is primarily a commercial bank offering products and services that meet the needs of business, professionals, and customers. The bank offers traditional banking products, as well as higher risk products such as electronic banking, remote deposit capture, international funds transfers, automated clearing house transactions, foreign correspondent bank accounts, trade finance, and pouch services. Online banking and bill pay are available through the bank's website. During the evaluation period, ENB operated four locations in Miami-Dade County. All locations provide lobby services and automated teller machines (ATMs) with reasonable hours of operation. As part of its downsizing and cost reduction strategy, the bank closed its Coral Gables Branch on November 3, 2021, which was located in an upper income tract.

As of December 31, 2023, ENB reported total assets of \$192.3 million and tier 1 capital of \$16.4 million. The loan portfolio consisted of real estate loans at 78.1 percent, commercial & industrial loans at 23.9 percent, and consumer loans at less than one percent. Total deposits were \$162.0 million of which 0.11 percent (\$182,000) were from foreign depositors which indicates that a small portion of the bank's domestic loans are being funded by foreign deposits.

The bank faced challenges to its ability to help meet the credit needs of its AA as the bank was operating under a Consent Order with capital requirements since November 19, 2020 (Order). The Order replaced a prior Consent Order issued on October 25, 2018 and an Individual Minimum Capital Ratio issued on November 1, 2018.

Although the bank was not eligible to participate in the Paycheck Protection Program or the Main Street Lending Programs due to the Order, it took proactive measures to support its customers such as providing payment consideration for adversely impacted overdrawn customers. Waiving deposit account overdraft and ATM fees, and granting loan forbearance, skip payments, payment deferrals, and loan modifications to both commercial and residential borrowers as needed. The bank granted 103 forbearances; the combined outstanding balance for the 103 loans that received a forbearance amounted to \$83.4 million.

Despite the Order, ENB supported the community credit needs in its AA. We considered these circumstances when evaluating the bank's CRA performance. At its last CRA evaluation dated July 6, 2020, ENB was rated "Outstanding."

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) evaluated the bank's CRA performance within its AA using Small Bank performance criteria and examination procedures. Our evaluation period for the lending test covered the period from January 1, 2020 through December 31, 2023 focusing on small business lending, which is ENB's primary business focus. Consistent with this primary lending focus, we sampled loans made to small businesses during the evaluation period. Due to changes in census data effective in 2022, we evaluated the bank's 2020-2021 lending performance separately from the bank's 2022 and 2023 lending performance. The OCC put the most weight on the 2022-23 data as it represents the majority of the volume of the bank's originations and purchases during the evaluation period.

Our evaluation considered the bank's performance context information. This includes legal limitations the bank faced since it was operating under the Order during the evaluation period. Additionally, high competition from other lenders in the AA coupled with the economic fallout of the COVID-19 pandemic limited lending opportunities in the AA. As a result, qualifying activities performed in response to the impact of the coronavirus pandemic across the United States were also considered in this evaluation.

### Selection of Areas for Full-Scope Review

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

### Ratings

The bank's overall rating is based entirely on the lending performance in the state of Florida.

The state rating is based on performance in the bank's AA. Refer to the "Scope" section under each state rating section for details regarding how the area was weighted in arriving at the respective ratings.

## Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c), respectively, in determining a national bank's or federal savings association's (collectively, banks) 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 Office of Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that ENB engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of Florida

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

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- The Lending Test rating is based on the reasonable distribution of loans in low- and moderate-income census tracts and the reasonable distribution of lending among businesses of different sizes throughout the bank's AA.
- A substantial majority of the bank's loan originations are within its AA.
- The bank's level of lending, based on the average quarterly LTD ratio is reasonable for the evaluation period.
- The bank did not receive any CRA-related complaints during the evaluation period.

### Description of Institution's Operations in Florida

ENB is located in Miami-Dade County and the bank's main office is located in a moderate-income geography. Two of the branches are in upper income geographies, and the other is in a moderate-income geography. The Miami-Dade County area has shown substantial economic resilience and growth over the past three years, overcoming some of the challenges posed by the COVID-19 pandemic. On March 20, 2020, the State of Florida issued a state-wide quarantine order mandating the closure of all non-essential businesses throughout the state of Florida. On May 14, 2020, non-essential businesses throughout Florida were permitted to reopen with occupancy restrictions. On April 29, 2021, the State of Florida suspended all COVID-19 public health restrictions and businesses were allowed to open at full capacity.

In 2020, Miami Dade County experienced a high level of unemployment due to the COVID-19 pandemic, driven by its heavy reliance on airport, seaport, and tourism industries. The Miami Dade County unemployment rate peaked at 12.0 percent in May 2020, compared to the state of Florida's peak unemployment rate of 14.2 percent in May 2020. During the evaluation period, the assessment area saw a decline in unemployment as the labor market loosened up and more workers re-entered the labor force since the spike in unemployment seen at the height of the pandemic. Despite improvements, unemployment rates at the state-level remained above pre-pandemic levels at the end of the assessment period.

Unemployment Rates				
	Dec-20	Dec-21	Dec-22	Dec-23
United States	6.70%	3.90%	3.50%	3.70%

Florida	6.40%	3.60%	2.80%	3.10%
Miami Dade County	8.90%	3.00%	2.10%	1.60%

Miami-Dade County is home to many industries that contribute to its economic growth. During the evaluation period, the highest employment sector consisted of trade, transportation, and utilities as Miami's greatest economic driver comes from the Port of Miami. The Port of Miami employs roughly 340,000 jobs and brings in \$61.4 billion in total economic activity for the state of Florida. Tourism remains a vital part of the economy, and the combination of arts, education, recreation, accommodation, and food services represent one of the largest sectors in the county.

At the end of 2021, 16.9 percent of families in the AA were below the poverty level. Families below the poverty level decreased to 12.7 percent in 2023 and the median family income in the MSA increased by 18.8 percent. Despite economic improvements, housing prices increased due to low interest rates and increased migration to Miami Dade County which led to a spike in demand for housing. Supply chain issues further limited the availability of construction materials, worsening the housing shortage. Additionally, investors bought single-family homes at record levels, causing more restraint in inventory and thus increased prices. The median housing value and median gross rents increased by 29.5 and 18.5 percent respectively and at the beginning of 2022, average 30-year mortgage rates increased to upwards of almost eight percent during the evaluation period. Homeowners who locked in lower rates before the increases were hesitant to move, meaning less inventory available for those who could still afford to purchase. According to the Federal Reserve Bank of St. Louis, the median listing price rose roughly \$225,990 during the evaluation period with the highest median price reaching \$730,000 in April 2023.

According to Dun and Bradstreet, as of June 2023, there were 2.26 million non-farm businesses in the AA of Miami-Fort Lauderdale-Palm Beach, Florida, making up 98.8 percent of the total business demographic and approximately 98.8 percent of these businesses are considered small businesses. In the AA, 2.9 percent, 22.4 percent, 29.1 percent, and 42.9 percent of small businesses are located in low-income, moderate-income, middle-income, and upper-income census tracts, respectively. The top industries consisted of non-classified establishments (36.4 percent), services (30.9 percent), and finance, insurance & real estate (10.9 percent).

ENB operates in a highly competitive market given the wide variety of options available for financial services within the assessment area. Competitors include other local community banks and larger financial institutions, credit unions and nonbank financial institutions such as mortgage lenders. According to the Federal Deposit Insurance Corporations (FDIC), there were 57 active institutions as of June 30, 2023, in Miami-Dade County. Large banks such as Bank of America, JPMorgan Chase, Wells Fargo, City National Bank of Florida, and Citibank represent 55.2 percent of the market share. ENB represented 0.10 percent of market share, ranking 44<sup>th</sup> out of the 57 total institutions. All of the bank's deposits are located within its AA.

Investment opportunities are highly competitive. Many community banks tend to purchase mortgage-backed securities with home mortgages to low and moderate income (LMI) borrowers or loans in LMI geographies, affordable housing multifamily properties, or Small Business Administration loan pools in their AAs. CD lending opportunities are available, including opportunities to partner with nonprofit organizations with a CD mission or purpose. There are numerous nonprofits that provide various services to LMI people or small businesses, such as affordable housing, financial literacy education, and support for economic development activities.



To assess community needs, we contacted and interviewed two local community organizations that provided services to LMI people or small businesses in the AA during the evaluation period. One affordable housing organization indicated that affordable housing for low-income households through affordable housing inventory and financing for land acquisition were the greatest needs in the AA. The other contact, a small business organization expressed a need for creative and flexible ways to provide credit to small businesses. Additionally, they indicated a need for technical assistance to small businesses and small business lending to nontraditional small business sectors that are most responsive to community needs including eldercare facilities, childcare facilities, and early learning centers.

There were census data changes between the 2015 ACS U.S. Census and the 2020 U.S. Census that became effective in 2022. In 2023, the number of LMI census tracts declined by 1.0 and 1.6 percent respectively when compared to 2021 and the number of businesses by geography increased by 38.9 percent from 2021 to 2023. Additionally, the total number of families and households by income level increased by 8.2 percent and 7.1 percent respectively while and the median housing value increased by 41.9 percent in 2023 compared to 2021. The tables below depict the demographic information in the MSA.

**Miami-Dade County, FL**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Miami-Dade County 2021</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	519	5.8	27.7	28.9	34.1	3.5
Population by Geography	2,639,042	5.5	29.7	30.9	33.2	0.7
Housing Units by Geography	998,833	5.3	27.5	29.3	37.2	0.6
Owner-Occupied Units by Geography	452,826	2.0	21.4	31.9	44.4	0.2
Occupied Rental Units by Geography	389,327	9.6	37.8	28.2	23.5	0.8
Vacant Units by Geography	156,680	4.3	19.4	24.6	50.4	1.3
Businesses by Geography	791,580	3.1	20.8	26.3	47.5	2.3
Farms by Geography	7,895	3.9	23.7	27.1	44.5	0.8
Family Distribution by Income Level	572,388	24.0	16.6	16.9	42.5	0.0
Household Distribution by Income Level	842,153	26.1	15.1	15.9	42.9	0.0
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL		\$49,264	Median Housing Value			\$244,010
			Median Gross Rent			\$1,155
			Families Below Poverty Level			16.9%
<i>Source: 2015 ACS and 2021 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

**Table A – Demographic Information of the Assessment Area**

Assessment Area: Miami-Dade County 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	707	4.8	24.9	31.3	34.4	4.7
Population by Geography	2,701,767	4.8	26.1	32.3	34.7	2.1
Housing Units by Geography	1,032,310	4.7	25.8	31.3	36.3	1.8
Owner-Occupied Units by Geography	465,833	2.0	18.3	33.1	45.3	1.3
Occupied Rental Units by Geography	436,367	8.0	36.6	31.4	21.7	2.2
Vacant Units by Geography	130,110	3.0	16.3	24.8	53.2	2.6
Businesses by Geography	1,096,338	2.5	19.4	29.1	45.3	3.7
Farms by Geography	10,247	4.0	21.9	28.0	43.9	2.1
Family Distribution by Income Level	619,475	23.1	17.3	17.6	42.0	0.0
Household Distribution by Income Level	902,200	25.9	15.1	16.1	42.8	0.0
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL		\$60,666	Median Housing Value			\$346,191
			Median Gross Rent			\$1,418
			Families Below Poverty Level			12.7%
<i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Florida

The rating for the state of Florida is based on a full-scope review of the performance in Miami-Dade County, Florida AA. The geographic and borrower analyses are conducted at the MSA level rather than the MD level. Refer to the table in appendix A for a list of all AAs under review.

## 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 performance in the state of Florida is adequate.

## Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State.

### *Small Loans to Businesses*

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

The geographic distribution of small loans to businesses is reasonable in the state of Florida

For 2020 and 2021, the geographic distribution of loans to small businesses is significantly lower than the percentage of businesses and the aggregate area. The bank did not originate or purchase any loans in low-income geographies. The two primary factors that impacted the lending performance of the Bank during the evaluation period were: (1) the Order, which the bank was operating under during the evaluation period, and (2) the Coronavirus pandemic, which impacted loan demand.

Therefore, the number of new loan requests declined during the evaluation period as the bank was unable to pursue loan growth during that time. The small business loans originated in 2020-2021 were from existing customers. Given that 2.9 percent of small businesses in low-income geographies indicate limited lending opportunities and high competition from other lenders, it is challenging to originate or purchase loans to small businesses in these areas. The distribution of loans to small businesses in moderate income geographies was near to both the percentage of businesses and the aggregate lending data.

For 2022 and 2023, the geographic distribution of small loans to businesses is significantly lower than the percentage of businesses and the aggregate area. The bank did not originate or purchase any loans in low-income geographies.

The aforementioned factors continued to impact the ENB's lending performance, so there were fewer new loan requests during this period, even from existing clients. The distribution of loans to small businesses in moderate income geographies exceeds both the percentage of businesses and the aggregate lending data.

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

There were no unexplained conspicuous gaps in lending to small businesses in LMI geographies during the evaluation period.

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

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

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

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

The distribution of loans to small business is reasonable in the state of Florida.

For 2020 and 2021, ENB's loans to small businesses with revenues of less than or equal to \$1 million was lower than the percentage of businesses and the aggregate lending data. The pandemic significantly impacted the bank's operations and its customers, especially during 2020 and 2021. The imposition of forced lockdowns, reductions in industrial production, delays in delivery channels, and reduced occupancy and other health and safety restrictions placed a considerable strain on small businesses within the bank's AA. Government-mandated safeguards led to the prolonged closure of many local businesses. As a result, bank customers were primarily concerned with business survivability, leading to

a halt in growth and expansion plans, which subsequently reduced the number of lending opportunities during this period. For 2022-2023, the bank's loans to businesses with revenues of less than or equal to \$1 million was lower than the percentage of businesses but was near to the aggregate lending data.

### **Responses to Complaints**

The bank did not receive any CRA related complaints during the evaluation period.

## COMMUNITY DEVELOPMENT

Based on a full-scope review, ENB exhibits adequate responsiveness to community development needs in the state through, 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. Performance related to community development activities had a neutral effect on the bank’s rating in the state.

### 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)
Miami Dade County	5	1,008	20	764	25	100	1,772	100	0	0

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

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

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank’s level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

During the evaluation period, the bank made 20 qualifying investments and donations totaling \$764,055. Investments included 3 certificates of deposit in minority owned depository institutions and 17 donations were made to organizations that support community services for LMI individuals. The prior period investment totaled \$1.0 million and are in certificates of deposit in minority owned depository institutions and an investment in an organization that provides affordable housing loans in the AA.

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

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	1/1/2020 to 12/31/2023	
<b>Bank Products Reviewed:</b>	Small business loans Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	Not applicable	Not applicable
<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</b>		
Florida	Full-scope	All of Miami-Dade County

## Appendix B: Summary of State Ratings

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RATINGS	EASTERN NATIONAL BANK
Overall Bank:	Lending Test Rating
Eastern National Bank	Satisfactory
State:	
Florida	Satisfactory

## 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.

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

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

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

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



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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 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.

**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 (MD):** 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 (MSA):** 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 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.

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased 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.

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2020-21</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Miami Dade County, FL	16	3,033	100	395,476	3.1	0.0	4.4	20.8	18.8	22.2	26.3	6.3	27.0	47.5	75.0	45.3	2.3	0.0	2.4	
<b>Total</b>	<b>16</b>	<b>3,033</b>	<b>100</b>	<b>395,476</b>	<b>3.1</b>	<b>0.0</b>	<b>4.4</b>	<b>20.8</b>	<b>18.8</b>	<b>22.2</b>	<b>26.3</b>	<b>6.3</b>	<b>27.0</b>	<b>47.5</b>	<b>75.0</b>	<b>45.3</b>	<b>2.3</b>	<b>0.0</b>	<b>2.4</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>																				
<i>Eastern National Bank (10000015748) excluded from Aggregate</i>																				

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2022-23</b>	
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			

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.

Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Miami Dade County FL	25	1,617	100	174,443	2.5	0.0	2.4	19.4	20.0	18.5	29.1	32.0	30.0	45.3	48.0	45.4	3.7	0.0	3.7
<b>Total</b>	<b>25</b>	<b>1,617</b>	<b>100</b>	<b>174,443</b>	<b>2.5</b>	<b>0.0</b>	<b>2.4</b>	<b>19.4</b>	<b>20.0</b>	<b>18.5</b>	<b>29.1</b>	<b>32.0</b>	<b>30.0</b>	<b>45.3</b>	<b>48.0</b>	<b>45.4</b>	<b>3.7</b>	<b>0.0</b>	<b>3.7</b>

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Eastern National Bank (10000015748) excluded from Aggregate

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2020-21</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		
Miami Dade County FL	16	3,033	100	142,633	93.3	25.0	38.4	2.7	75.0	4.0	0.0		

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.

<b>Total</b>	<b>16</b>	<b>3,033</b>	<b>100</b>	<b>142,633</b>	<b>93.3</b>	<b>25.0</b>	<b>38.4</b>	<b>2.7</b>	<b>75.0</b>	<b>4.0</b>	<b>0.0</b>
<p><i>Source: 2021 D&amp;B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i></p> <p><i>Eastern National Bank (10000015748) excluded from Aggregate</i></p>											

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2022-23</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>
Miami Dade County FL	25	1,617	100	174,443	94.8	48.0	52.0	1.3	52.0	3.8	0.0

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.

<b>Total</b>	<b>25</b>	<b>1,617</b>	<b>100</b>	<b>174,443</b>	<b>94.8</b>	<b>48.0</b>	<b>52.0</b>	<b>1.3</b>	<b>52.0</b>	<b>3.8</b>	<b>0.0</b>
<p><i>Source: 2023 D&amp;B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.                  Due to rounding, totals may not equal 100.0%</i></p> <p><i>Eastern National Bank (10000015748) excluded from Aggregate</i></p>											

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.