



## PUBLIC DISCLOSURE

June 11, 2018

### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Axiom Bank, N.A.  
Charter Number 25139

258 Southhall Lane, Suite 400 Maitland, FL 32751

Office of the Comptroller of the Currency

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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## **Overall CRA Rating: Satisfactory**

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

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

Axiom Bank, National Association (Axiom or the bank) has a satisfactory record of meeting community credit needs based on the following:

- Axiom has maintained a loan-to-deposit (LTD) ratio on a quarterly basis that is more than reasonable considering the bank's strategy with branch locations in Walmart Stores, its asset size, financial condition, and meeting its assessment area (AA) credit needs.
- A majority of the bank's lending, by number and dollar amount of loans originated are inside the bank's assessment area (AA).
- The overall level of lending to borrowers reflects reasonable penetration among individuals of different income levels, yet poor penetration to small businesses of different sizes.
- The overall geographic distribution of loans reflects reasonable dispersion among families and households of different income levels and businesses of different sizes.
- The bank's performance under the community development (CD) lending test is satisfactory and shows good responsiveness to the needs of the AA.

## Definitions and Common Abbreviations

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

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

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

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

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

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

vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

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

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

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/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. 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 it and half below it.

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

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a 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.

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

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

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

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

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

## **Description of Institution**

Axiom is a nationally chartered single-state community bank headquartered in Maitland, Florida at 258 Southhall Lane, Suite 400. The bank is a \$560 million institution owned by Axiom Bancshares, Inc., a one-bank holding company located in Maitland, Florida. For the evaluation period, the bank has eight AAs, with twenty-three branches in total, located in four regions of the state, Central, Western, Lakeland and Jacksonville, Florida. Twenty-two of the bank's locations are in select Walmart Supercenters and one is a stand-alone branch. The bank maintains deposit taking automated teller machines (ATMs) at each location. During the evaluation period, the bank opened four new branches and closed one branch. For the evaluation period the bank did not have any merger and acquisition activity. In 2016 the bank changed its strategy to no longer originate or purchase 1-4 family residential real estate loans. Bank management business strategy is to grow the commercial loan portfolio, issue credit cards, originate or purchase indirect consumer lending, and grow the prepaid card program.

The bank is a full service institution and offers a range financial products and services. Retail banking services the bank offers are personal checking accounts, savings accounts, money market accounts, individual retirement accounts and certificates of deposit. The bank offers mobile deposit services, debit cards and online banking services. The bank also specializes in commercial banking, treasury management services and commercial loans.

As of December 31, 2017, Axiom reported total assets of \$560 million, net loans and leases of \$462 million, and tier one capital of \$98 million. As of the same time period, residential real estate loans represented 50.49 percent and small business loans represented 24.92 percent of gross loans. For this evaluation, we concluded residential real estate and small business loans were the primary loan products.

There are no legal, financial or other factors impeding the bank's ability to meet the credit needs in its AA. The bank received a CRA rating of "satisfactory" at its last CRA evaluation, dated May 27, 2014.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We completed a review of Axiom's CRA performance under the intermediate-small bank (ISB) CRA procedures, which include the lending test and the Community Development (CD) test. The lending test evaluates the bank's record of meeting the credit needs of its AA through lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AA through qualified CD lending, investments and services.

The evaluation period for the lending test is January 1, 2015 through December 31, 2017. During the evaluation period, the bank changed its lending strategy and it is no longer a HMDA Reporter. Conclusions regarding the bank's lending performance are

based on commercial loans, since it is the majority of the bank's lending and one of the bank's primary loan products. Our analyses is based on a valid sample of commercial loans. The evaluation period for the CD loans, investments and services is June 1, 2014 through December 31, 2017.

## **Data Integrity**

We performed a data integrity review that commenced on March 24, 2017. The purpose of the review was to determine the accuracy and reliability of the HMDA Loan Application Register (LAR) data. The review deemed the HMDA data inaccurate and unreliable. After validation of the HMDA data by two external audit firms, the data was determined to be reliable for use. No affiliates exists; therefore, affiliated activities were not considered in this evaluation.

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

For the evaluation period, the Orlando-Kissimmee-Sanford, Tampa-St. Petersburg-Clearwater and Ocala Metropolitan Statistical Areas (MSAs) were selected for full-scope review. Ocala was selected as a full-scope review area, since it has not been reviewed as a full-scope review area in the most recent performance evaluations. Please refer to the table in appendix A for more information.

## **Ratings**

The bank's overall rating is based primarily on observed performance as well as context information from the Orlando-Kissimmee-Sanford and Tampa-St. Petersburg-Clearwater Metropolitan Statistical Areas (MSAs). The majority of the bank's lending activity is in the Orlando-Kissimmee-Sanford, Tampa-St. Petersburg-Clearwater MSAs, therefore, activity in these MSAs were weighted more than the other MSAs.

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

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, 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 assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution 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.

## **Conclusions with Respect to Performance Tests**

Lending tests and community development tests indicate that Axiom meets the standards for satisfactory performance. There were no discriminatory lending practices identified during the evaluation period.

### **LENDING TEST**

Overall, performance under the lending test is Satisfactory.

#### **Loan-to-Deposit Ratio**

The bank's average loan-to-deposit ratio is more than reasonable given the bank's size, financial condition and assessment area credit needs. Axiom's loan-to-deposit ratio averaged 103.83 percent over the 12 quarters since the previous CRA evaluation. Axiom's loan-to-deposit ratio ranged from a high of 112.22 percent in June 2015 to a low of 97.80 percent in December 2016.

While Axiom has several competitors, none are considered similarly-situated in terms of business model and location. Axiom's business model is significantly different from other banks located in the Bank's assessment area. The bank has 23 locations spanning from Jacksonville in the Northeast portion of Florida to Bradenton located in Central Western Florida. Of these 23 locations, 22 are located inside of Walmart Super Centers and one is a stand-alone branch. The single stand-alone branch is located in Orlando, Florida. There are no other banks operating solely in Florida that have such a significant branch presence in grocery stores.

Using the December 31, 2017, Uniform Bank Performance Report (UBPR), the bank's loan-to-deposit ratio was compared to the peer group defined in the UBPR. This peer group consisted of 1,220 banks with total assets between \$330 million and \$1 billion. At year-end 2017, Axiom's loan-to-deposit ratio was 106.52 percent, this compares favorably to the UBPR peer average loan-to-deposit ratio of 82.20 percent. Axiom's loan-to-deposit ratio exceeded UBPR peer averages in every quarter of the evaluation period.

#### **Lending in Assessment Area**

#### **Lending to Borrowers of Different Incomes and to Businesses of Different Sizes**

Refer to Table P and R in appendix C for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

Overall, the level of lending to borrowers of different incomes and to businesses of different sizes is reasonable, compared to census characteristics.

Axiom Bank originates a majority of its loans to borrowers located within its AA and meets the standard of reasonable performance for the evaluation period. Seventy-nine percent of bank's lending by number of loans and sixty-six percent by dollar volume are inside the Orlando AA.

**Table D - Lending Inside and Outside of the Orlando AA  
(January 1, 2015 to December 31, 2017)**

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2015	15	56.52	7	31.82	22	3,770	67.71	1,798	32.29	5,568
2016	1	100.00	0	00.0	1	1,232	100.00	0	0.00	1,232
2017	0	0.00	0	0.00	0	0	0.00	0	0.00	0
<b>Subtotal</b>	<b>16</b>	<b>69.57</b>	<b>7</b>	<b>30.43</b>	<b>23</b>	<b>5,002</b>	<b>73.56</b>	<b>1,798</b>	<b>26.44</b>	<b>6,800</b>
Commercial loans										
2015	29	78.38	8	21.62	37	90,700	64.09	50,819	35.91	141,520
2016	27	79.41	7	20.59	34	38,331	61.63	23,868	38.37	62,199
2017	40	83.33	8	16.67	48	114,696	68.99	51,548	31.01	166,244
<b>Subtotal</b>	<b>96</b>	<b>80.67</b>	<b>23</b>	<b>19.33</b>	<b>119</b>	<b>243,728</b>	<b>65.88</b>	<b>126,235</b>	<b>34.12</b>	<b>369,963</b>
<b>Total</b>	<b>112</b>	<b>78.87</b>	<b>30</b>	<b>21.13</b>	<b>142</b>	<b>243,733</b>	<b>65.88</b>	<b>126,237</b>	<b>34.12</b>	<b>369,970</b>

Source: HMDA and Bank Provided Data

An analysis of home mortgage loans is not meaningful, since the bank did not originate enough loans in each assessment area during the evaluation period. On the 2015 HMDA LAR the bank reported ten loans in the Orlando-Kissimmee-Sanford MSA, one loan in the Tampa-St. Petersburg-Clearwater MSA, two loans in the North Port-Sarasota-Bradenton MSA, and two loans in the Palm Bay-Melbourne-Titusville MSA. The bank had one commercial loan on its 2016 HMDA LAR. A HMDA LAR was not reported for 2017, since the bank changed its business strategy to no longer originate or purchase residential real estate loans. An analysis of commercial loans in the Tampa-St. Petersburg-Sanford and Ocala MSAs is not meaningful, since the bank did not originate enough commercial loans in the MSAs during the evaluation period.

Based on limited-scope reviews, the bank's performance under the lending test in the Deltona-Daytona Beach-Ormond, Jacksonville, Lakeland-Winter Haven, North Port-Sarasota-Bradenton and Palm Bay-Melbourne-Titusville AAs is inconsistent with the bank's overall satisfactory performance under the lending test in the state of Florida. For the evaluation the bank originated a limited number of loans in the limited scope areas.

## **Geographic Distribution of Loans**

Refer to Table O and Q in appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The overall geographic distribution of loans reflects a reasonable dispersion among families and households of different income levels and businesses of different sizes. There were no loans in low-income census tracts, the majority of lending activity was in moderate income census tracts. There were no conspicuous gaps identified in the geographic distribution.

The bank's lending to businesses of different sizes is significantly lower than the percentage of small businesses in the AA and reflects poor penetration. According to Dun and Bradstreet data, during 2017, 90 percent of businesses within the AA reported annual revenues of less than \$1 million. Based on our sampling, the bank originated 42.9 percent of the number of loans to businesses with annual revenues less than \$1 million. The results are similar during 2015-2016, when 82.4 percent of businesses in the AA reported annual revenues less than \$1 million and the bank originated 30.8 percent of loans to small businesses. A majority of the sampled loans were originated to large regional commercial real estate companies which primarily serve the prevalent leisure/hospitality sector of the AA.

Based on limited-scope reviews, the bank's performance under the lending test in the Deltona-Daytona Beach-Ormond, Jacksonville, Lakeland-Winter Haven, North Port-Sarasota-Bradenton and Palm Bay-Melbourne-Titusville AAs is inconsistent with the bank's overall satisfactory performance under the lending test in the state of Florida. For the evaluation the bank originated a limited number of loans in the limited scope areas.

## **Responses to Complaints**

During the evaluation period, the bank did not receive any complaints or public comments regarding CRA performance.

## **COMMUNITY DEVELOPMENT TEST**

Axiom Community Development (CD) test is rated satisfactory. The level of CD activities demonstrates adequate responsiveness to the needs of the community. Factors supporting this conclusion include a satisfactory record regarding qualified CD loans, investment, donations, and services, combined with adequate responsiveness to CD needs. Affordable housing and community services were responsive to the needs for low-to-moderate income families. The bank provided \$11 million in qualifying CD loans and \$2.8 million in qualifying investments and donations. In addition, Axiom staff provided 236 CD qualifying service activities to 64 organizations during the evaluation period.

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

The bank demonstrated satisfactory performance for CD lending in its AAs. For the evaluation period the bank reported 14 CD loans totaling \$11 million. The majority of the CD loans were in five of its eight AAs and the loans were used to provide affordable housing rehabilitation and construction, including construction and permanent financing of multi-family rental property serving low- and moderate- income families and individuals. Several of the CD loans provided job creation for low-to-moderate income individuals.

Based on limited-scope reviews, the bank's performance for CD loans in the limited scope AAs of Deltona-Daytona Beach-Ormond, Jacksonville, Lakeland-Winter Haven, North Port-Sarasota-Bradenton and Palm Bay-Melbourne-Titusville AAs was not inconsistent with the bank's overall satisfactory performance under the CD test.

## **Number and Amount of Qualified Investments**

During the evaluation period, Axiom demonstrated satisfactory responsiveness to CD needs through qualified investment and donation activities within its AAs. The bank made two qualifying investments and 47 donations totaling \$2.8 million. The two investments totaling \$2.5 million were in mortgage-backed security (MBS) pools that provided affordable housing to LMI borrowers. The loans in the MBS pool were located within the bank's eight AAs. The donations made during the evaluation period total \$335 thousand and were for charitable contributions to organizations that provide community services to LMI individuals.

Based on limited-scope reviews, the bank's performance for CD investments in the limited scope AAs of Deltona-Daytona Beach-Ormond, Jacksonville, Lakeland-Winter Haven, North Port-Sarasota-Bradenton and Palm Bay-Melbourne-Titusville AAs was not inconsistent with the bank's overall satisfactory performance under the CD test.

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

Axiom staff contributed their financial expertise to local community development organizations through their memberships and active participation in various loan programs, which targeted low- and moderate-income families within its AAs. Bank staff are also active on Boards of local community development organizations. For the evaluation period, the bank provided 236 service related activities to 64 organizations throughout its AAs. The bank staff spent 442 hours ensuring community development needs were met in the communities they serve in the AAs. Many of the community services hours were spent in financial literacy, teaching Money Smart and Bank-On-It programs.

Based on limited-scope reviews, the bank's performance for CD services in the limited scope AAs of Deltona-Daytona Beach-Ormond, Jacksonville, Lakeland-Winter Haven, North Port-Sarasota-Bradenton and Palm Bay-Melbourne-Titusville AAs was not inconsistent with the bank's overall satisfactory performance under the CD test.

### **Responsiveness to Community Development Needs**

Axiom CD activities demonstrate adequate responsiveness to the CD needs of its AAs, particularly considering the bank's asset size, complexity and performance context. During the evaluation period, the bank provided CD loans to businesses which provide affordable multifamily housing to LMI individuals and created jobs for LMI individuals. Bank staff performed financial literacy classes for LMI families and individuals. Community contacts identified the need for affordable housing assistance and financial literacy throughout the AAs, which the bank met with its CD loans, investments and services.

# 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 metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): (01/01/15 to 12/31/17) Investment and Service Tests and CD Loans: (01/01/14 to 12/31/17)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
(Name of Bank (Abbreviation) City, State) <b>Axiom Bank, N.A. Maitland, FL</b>	Commercial Loans Primary Product	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	None	None
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Orlando-Kissimmee-Sanford	Full-Scope	
Tampa-St. Petersburg-Clearwater	Full-Scope	
Ocala	Full Scope	
Deltona-Daytona Beach-Ormond Beach	Limited Scope	
Jacksonville	Limited Scope	
Lakeland-Winter Haven	Limited Scope	
North Port-Sarasota-Bradenton	Limited Scope	
Palm Bay-Melbourne-Titusville	Limited Scope	

## Appendix B: Community Profiles for Full-Scope Areas

### Orlando-Kissimmee-Sanford MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Axiom Bk Orlando						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	389	2.1	27.2	39.3	31.1	0.3
Population by Geography	2,134,411	1.1	26.7	41.3	30.9	0.0
Housing Units by Geography	917,474	1.1	27.5	42.9	28.6	0.0
Owner-Occupied Units by Geography	505,982	0.5	20.0	43.8	35.7	0.0
Occupied Rental Units by Geography	262,772	2.2	40.1	39.7	18.0	0.0
Vacant Units by Geography	148,720	1.1	30.4	45.3	23.2	0.0
Businesses by Geography	236,735	0.6	23.5	38.5	37.4	0.0
Farms by Geography	5,948	0.6	19.7	46.5	33.1	0.1
Family Distribution by Income Level	521,311	20.1	18.6	20.8	40.5	0.0
Household Distribution by Income Level	768,754	22.0	17.8	19.3	40.9	0.0
Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA		\$58,474	Median Housing Value			\$224,608
			Median Gross Rent			\$1,020
			Families Below Poverty Level			9.1%
<i>Source: 2010 U.S. Census and 2016 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>						

The Orlando-Kissimmee-Sanford MSA includes Orange, Osceola, Seminole and Lake Counties. The bank claims whole counties in which it has operations and does not arbitrarily exclude low and moderate-income census tracts. The primary business focus is commercial lending. According to June 30, 2017 FDIC Summary of Deposits, Axiom had \$202,605,000 of deposits in the MSA. Axiom's deposit market share in the MSA was 0.42 percent, which is the 24<sup>th</sup> out of 46 institutions. There is strong competition for deposits from large national and regional banks, the top five comprising 70 percent of the market. The largest competitors are SunTrust Bank, Bank of America, NA, Wells Fargo, NA, JP Morgan Chase Bank, NA, and Branch Banking and Trust.

The 2010 US Census indicates the population of the MSA was approximately 2.1 million. The 2017 FFIEC adjusted median family income was \$58,474. Low-income

families earning a median income of \$28,900 or less represent 20.1 percent of families in the AA. Moderate-income families comprise 18.6 percent of the AA population. In the AA 9.1 percent of the AA was earning wages below the poverty level.

The median housing value in Orlando-Kissimmee-Sanford MSA is \$224,608. According the U.S. Census, 50.53 percent are owner-occupied and 32.25 percent are rental units. The bank has eight branches in the MSA with an ATM at each location; four branches are located in Orlando, and the other branches are located in St. Cloud, Sanford, Leesburg and Kissimmee. One new branch opened during the evaluation period in 2017 in Orlando.

According to the Bureau of Labor Statistics, the Orlando-Kissimmee-Sanford MSA had a 4.6 percent unemployment rate in December 2015. Over the subsequent two years, unemployment percentages consistently decreased. The unemployment rate in December 2016 was 4.1, and fell to 3.3 percent in December 2017. The Bureau of Labor Statistics indicates the national unemployment rate was 5.0 percent in December 2015, 4.7 percent in December 2016, and 4.1 percent in December 2017. In comparison, the annual unadjusted unemployment rate for Florida decreased from 5.1 percent in December 2015, 4.7 percent in December 2016, and again dropped to 3.9 percent in 2017. The Orland-Kissimmee-Sanford MSA has been consistently lower than the national averages throughout the evaluation period. According to Moody's Analytics, although the employment rate has declined, the hourly wages have not increased due to the labor force growing five times faster than the national rate.

Moody's Analytics reports growth in tourism is expected to slow, but it will still outpace the state and the nation over the next two years due to new attractions. Jobs and income in leisure and hospitality will accelerate over the next two years with these new attractions and the expanding U.S. economy. Theme park expansions will drive short-term growth in Orlando-Kissimmee-Sanford, but higher interest rates and a rising U.S. dollar represent a medium-term risk to leisure, hospitality and manufacturing. Moderate costs, high quality of life, robust in-migration, and a thriving tourism industry will propel growth into the long term. Leisure and Hospitality services account for 20.9 percent of employment in Orlando-Kissimmee-Sanford followed by Professional and Business Services (17.1 percent), Education and Health Services (12.1 percent) and Retail Trade (12.0 percent). The industry could face some challenges as rising interest rates strengthen the dollar and make traveling to Orlando more expensive for overseas visitors. Higher admission prices at amusement parks may discourage domestic visitors. In the Orlando-Kissimmee-Sanford MSA, the five major employers are Walt Disney World Resort, Universal Orlando, Adventist Health System/Florida Hospital, Publix and the Orlando International Airport.

During the evaluation period, we contacted community development organizations (CDO) from the Orlando-Kissimmee-Sanford MSA. CDOs revealed the need for small loans to businesses for general operations, working capital lines of credit, accounts receivable, and equipment. Financial education for small businesses is also needed. In

addition, there is a need for affordable housing options and long-term capital sources. The need for transient services to support the homeless population was also identified.

## Tampa-St. Petersburg-Clearwater MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Axiom Bk Tampa						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	320	7.8	22.5	36.3	30.9	2.5
Population by Geography	1,229,226	6.1	23.8	34.8	34.9	0.4
Housing Units by Geography	526,016	6.0	24.6	36.2	33.2	0.0
Owner-Occupied Units by Geography	292,728	3.2	18.9	36.8	41.1	0.0
Occupied Rental Units by Geography	169,719	10.0	32.7	35.9	21.4	0.0
Vacant Units by Geography	63,569	7.7	29.3	34.6	28.4	0.0
Businesses by Geography	131,280	4.7	20.4	32.7	41.9	0.3
Farms by Geography	3,191	3.0	19.0	38.0	40.0	0.0
Family Distribution by Income Level	295,936	20.8	17.3	18.5	43.4	0.0
Household Distribution by Income Level	462,447	21.5	15.9	18.0	44.7	0.0
Median Family Income MSA - 45300 Tampa-St. Petersburg-Clearwater, FL MSA		\$57,333	Median Housing Value			\$209,998
			Median Gross Rent			\$926
			Families Below Poverty Level			10.7%
<i>Source: 2010 U.S. Census and 2016 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>						

The Tampa-St. Petersburg-Clearwater MSA is comprised of Hernando, Hillsborough, Pasco and Pinellas Counties. In this MSA, the bank claims only Hillsborough County as its assessment area. The bank claims the whole county in which it has operations and does not arbitrarily exclude low and moderate-income census tracts. According to June 30, 2017 FDIC Summary of Deposits, Axiom had \$17,076,000 of deposits in the MSA. The primary business focus is commercial lending. Axiom's deposit market share in the MSA was 0.02 percent, which is the 59<sup>th</sup> out of 63 institutions. There is strong competition for deposits from large national and regional banks, the top five comprising 62 percent of the market. The largest competitors are Raymond James Bank, NA, Bank of America, NA, Wells Fargo, NA, SunTrust Bank, and Regions.

The 2010 US Census indicates the population of the MSA was approximately 1.2 million. The 2017 FFIEC adjusted median family income was \$57,333. Low-income families earning a median income of \$29,600 or less represent 20.8 percent of families in the AA. Moderate-income families comprise 17.3 percent of the AA population. In 2016, 10.7 percent of the AA was earning wages below the poverty level.

The median housing value in Tampa- St. Petersburg-Clearwater is \$209,998. According to the U.S. Census, 51.78 percent are owner-occupied and 36.75 percent are rental units. The bank has three branches in the MSA, with an ATM at each location; one branch is located in Tampa, and the other branches are located in Brandon and Plant City. The Tampa and Plant City branches opened in 2017.

According to the Bureau of Labor Statistics, the Tampa-St. Petersburg-Clearwater MSA had a 4.7 percent unemployment rate in December 2015. Over the subsequent two years, unemployment percentages consistently decreased. The unemployment rate in December 2016 was 4.2 percent, and fell to 3.4 percent in December 2017. The Tampa-St. Petersburg-Clearwater MSA has been consistently lower than the national averages throughout the evaluation period. The Bureau of Labor Statistics indicates the national unemployment rate was 5.0 percent in December 2015, 4.7 percent in December 2016, and 4.1 percent in December 2017. In comparison, the annual unadjusted unemployment rate for Florida decreased from 5.1 percent in December 2015, 4.7 percent in December 2016, and again dropped to 3.9 percent in 2017.

Moody's Analytics reports wages in the Tampa-St. Petersburg-Clearwater MSA are at their highest level, which indicates the area's economy is at full employment. Hurricane Irma played a factor in the slow rate of jobs in tourism, but are expected to rebound over the next year with the surge in hotel room availability, renovated attractions and spillover demand from Orlando. However, the outlook for leisure and hospitality is at risk due to rising interest rates which will make traveling to the U.S. costlier for overseas visitors and foreign vacations more attractive to Americans. Professional and Business Services account for 18.2 percent of total employment, followed by Education and Health Services (15.4 percent), Retail Trade (12.6 percent) and Government (11.8 percent) and Leisure and Hospitality Services (11.3 percent). In the Tampa-St. Petersburg-Clearwater MSA, the five major employers are Publix Super Markets Inc., BayCare Health System, HCA Holdings, MacDill Air Force Base, and Verizon Communications.

During the evaluation period, we contacted community development organizations (CDOs) from the Tampa-St. Petersburg-Clearwater MSA. The CDOs indicated a need for bank professional assistance with technical assistance in the areas of marketing, IT and human resources. Additional identified needs are program funding for redevelopment needs, small business financial education and access to capital. Community contacts indicated they would like to see more bank partnerships with regard to initiatives for the communities. Non-complex financial literacy is needed. In addition, funds for grants for community services are needed. Banks also have the

opportunity to assist with financing for affordable housing, particularly for multifamily housing in non-metropolitan and underserved communities.

## Ocala MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Axiom Bk Ocala						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	63	0.0	23.8	55.6	17.5	3.2
Population by Geography	331,298	0.0	16.9	67.8	15.3	0.0
Housing Units by Geography	161,264	0.0	17.0	68.7	14.3	0.0
Owner-Occupied Units by Geography	105,672	0.0	13.0	73.1	13.9	0.0
Occupied Rental Units by Geography	28,294	0.0	28.1	53.9	17.9	0.0
Vacant Units by Geography	27,298	0.0	20.7	67.0	12.2	0.0
Businesses by Geography	25,900	0.0	18.2	54.1	27.7	0.0
Farms by Geography	1,680	0.0	15.3	59.5	25.2	0.0
Family Distribution by Income Level	91,513	18.1	19.8	22.8	39.3	0.0
Household Distribution by Income Level	133,966	21.6	17.5	20.4	40.5	0.0
Median Family Income MSA - 36100 Ocala, FL MSA		\$47,614	Median Housing Value			\$150,430
			Median Gross Rent			\$833
			Families Below Poverty Level			11.1%
<i>Source: 2010 U.S. Census and 2016 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>						

The Ocala MSA includes Marion County. The bank claims the whole county in which it has operations and does not arbitrarily exclude low and moderate-income census tracts. The primary business focus is commercial lending. According to June 30, 2017 FDIC Summary of Deposits, Axiom had \$8,487,000 of deposits in the MSA. Axiom's deposit market share in the MSA was 0.14 percent, which is 20<sup>th</sup> out of 21 institutions. There is strong competition from deposits from large national and regional banks, the top five comprising 74 percent of the market. The largest competitors are SunTrust Bank, Bank of America, NA, Wells Fargo Bank, NA, Regions Bank, and Compass Bank.

The 2010 US Census indicates the population of the MSA was approximately 331 thousand. The 2017 FFIEC adjusted median family income was \$47,614. Low-income families earning a median income of \$23,750 or less represent xx percent of families in

the AA. Moderate-income families comprise 18.1 percent of the AA population. In 2016, 11.1 percent of the AA was earning wages below the poverty level.

The median housing value in Ocala is \$150,430. According the U.S. Census, 61.07 percent are owner-occupied and 19.75 percent are rental units. The bank has one branch in the MSA, to include an ATM.

According to the Bureau of Labor Statistics, the Ocala MSA had a 5.9 percent unemployment rate in December 2015. Over the subsequent two years, unemployment percentages consistently decreased. The unemployment rate in December 2016 was 5.4, and fell to 4.4 percent in December 2017. The Ocala MSA unemployment rate has been consistently higher than both the national and state averages throughout the evaluation period. The Bureau of Labor Statistics indicates the national unemployment rate was 5.0 percent in December 2015, 4.7 percent in December 2016, and 4.1 percent in December 2017. In comparison, the annual unadjusted unemployment rate for Florida decreased from 5.1 percent in December 2015, 4.7 percent in December 2016, and again dropped to 3.9 percent in 2017. According to Moody's Analytics, the labor market has improved recently with payroll employment increasing 1 percent above its level in March 2017.

Moody's Analytics reports healthcare and consumer industries will remain a major source of new jobs as the metro area gets closer to full employment. Below average living costs, relative to other Florida localities, will attract both tourists and new residents, especially retirees. The growing number of seniors will be beneficial to healthcare, which comprises nearly one in five nonfarm jobs and accounts for an even a higher share of wage income with workers earning 25 percent more, on average, than those in other industries. Education and Health Services make up 18.2 percent of the total employment, followed by Retail Trade (16.1 percent), Government (14.5 percent) and Leisure and Hospitality Services (12.5 percent). In the Ocala MSA, the five major employers are Munroe Regional Medical Center, Wal-Mart Stores, Inc., Ocala Regional Medical Center, Publix Super Markets, Inc., and AT&T.

During the evaluation period, we contacted a community development organization (CDO) from the Ocala MSA. Credit needs noted by the CDO include more flexible and creative funding for start up to mid-size businesses, to include lower interest rate loans. In addition, due to the growing population, there is a need for affordable housing. Banks in the area provide financial education and seminars regarding capital access to the community.

### **Limited Scope**

The following five MSAs were reviewed as a limited scope: Northport-Sarasota-Bradenton, Deltona-Daytona-Ormond Beach, Lakeland-Winter Haven, Palm Bay-Melbourne-Titusville, and Jacksonville. Moody's Analytics reports the following information for the MSAs: Some of the MSAs are still recovering from Hurricane Irma but with little difficulty. The economy continues to improve and is seeing a growing

population, new home and commercial construction, and job growth, especially in healthcare. Healthcare is the fastest-growing industry due to the large retiree population. Seniors are attracted to the climate and coastal amenities. Of note, in the Delton-Daytona-Ormond Beach MSA, hourly wages are up 10 percent over the last year, quadruple the statewide gain. This MSA also has relatively low-cost housing. The Lakeland-Winter Haven MSA also has low-cost housing; however, the share of the residents with negative equity remains the highest in the U.S. Of note in the Palm Bay-Melbourne-Titusville MSA is the aerospace industry as the key source of high paying jobs. Largely because of the military contractors and commercial aerospace, this MSA is the only Florida metro that is more reliant on manufacturing than the U.S. average. The Jacksonville MSA is seeing job growth double the U.S. rate; however, the growth of hourly wages is well below average. Unlike the other reviewed MSAs that has their employment concentrated in professional business services, education and health services, leisure and hospitality services, and retail; Jacksonville has seen their largest growth in financial services. Financial services grew by 4.8 percent in 2017 and account for 11 percent of the area's private workforce, second behind that of Hartford, CT.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

The set of tables is provided for the State of Florida. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/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. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

- Table B. Median Family Income Ranges** - Details income ranges from the updated median family income values for the MSAs/MDs as produced annually by the FFIEC.
- Table C. Branch and ATM Distribution Level by Geography Income Level** - Contains demographic data from the US Census for the number of Census tracts, the population in those tracts, and branches and ATMs in those tracts.
- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents aggregate peer data for the years the data is available.
- 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 originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because 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 (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

<b>Table B – Median Family Income Ranges</b>				
<b>Median Family Incomes</b>	<b>Low &lt;50%</b>	<b>Moderate 50% to &lt;80%</b>	<b>Middle 80% to &lt;120%</b>	<b>Upper ≥120%</b>
<b>Deltona-Daytona Beach-Ormond Beach, FL MSA Median Family Income (19660)</b>				
2015 (\$51,500)	<\$25,750	\$25,750 to <\$41,200	\$41,200 to <\$61,800	≥\$61,800
2016 (\$51,700)	<\$25,850	\$25,850 to <\$41,360	\$41,360 to <\$62,040	≥\$62,040
<b>Jacksonville, FL MSA Median Family Income (27260)</b>				
2015 (\$63,300)	<\$31,650	\$31,650 to <\$50,640	\$50,640 to <\$75,960	≥\$75,960
2016 (\$64,900)	<\$32,450	\$32,450 to <\$51,920	\$51,920 to <\$77,880	≥\$77,880
<b>Lakeland-Winter Haven, FL MSA Median Family Income (29460)</b>				
2015 (\$50,300)	<\$25,150	\$25,150 to <\$40,240	\$40,240 to <\$60,360	≥\$60,360
2016 (\$51,800)	<\$25,900	\$25,900 to <\$41,440	\$41,440 to <\$62,160	≥\$62,160
<b>North Port-Sarasota-Bradenton, FL MSA Median Family Income (35840)</b>				
2015 (\$62,300)	<\$31,150	\$31,150 to <\$49,840	\$49,840 to <\$74,760	≥\$74,760
2016 (\$61,900)	<\$30,950	\$30,950 to <\$49,520	\$49,520 to <\$74,280	≥\$74,280
<b>Ocala, FL MSA Median Family Income (36100)</b>				
2015 (\$47,300)	<\$23,650	\$23,650 to <\$37,840	\$37,840 to <\$56,760	≥\$56,760
2016 (\$47,500)	<\$23,750	\$23,750 to <\$38,000	\$38,000 to <\$57,000	≥\$57,000
<b>Orlando-Kissimmee-Sanford, FL MSA Median Family Income (36740)</b>				
2015 (\$58,300)	<\$29,150	\$29,150 to <\$46,640	\$46,640 to <\$69,960	≥\$69,960
2016 (\$57,800)	<\$28,900	\$28,900 to <\$46,240	\$46,240 to <\$69,360	≥\$69,360
<b>Palm Bay-Melbourne-Titusville, FL MSA Median Family Income (37340)</b>				
2015 (\$61,900)	<\$30,950	\$30,950 to <\$49,520	\$49,520 to <\$74,280	≥\$74,280
2016 (\$58,300)	<\$29,150	\$29,150 to <\$46,640	\$46,640 to <\$69,960	≥\$69,960
<b>Tampa-St. Petersburg-Clearwater, FL MSA Median Family Income (45300)</b>				
2015 (\$59,000)	<\$29,500	\$29,500 to <\$47,200	\$47,200 to <\$70,800	≥\$70,800
2016 (\$59,200)	<\$29,600	\$29,600 to <\$47,360	\$47,360 to <\$71,040	≥\$71,040
<i>Source: FFIEC Due to rounding, totals may not equal 100.0</i>				

**Table C - Branch and ATM Distribution by Geography Income Level**

**Assessment Area: Combined**

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	33	4.2	98,364	2.6	1	4.35	1	0.0	0	0.0	0	0.0
Moderate	196	25.1	928,420	24.8	8	34.78	8	0.0	1	0.0	0	0.0
Middle	309	39.5	1,560,039	41.6	10	43.48	10	0.0	3	100.0	1	100.0
Upper	233	29.8	1,158,342	30.9	4	17.39	4	0.0	0	0.0	0	0.0
NA	11	1.4	5,364	0.1	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>782</b>	<b>100.0</b>	<b>3,750,529</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>

*Source: 2010 U.S. Census & Bank Data  
Due to rounding, totals may not equal 100.0*

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-16**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Axiom Bk Northport	2	1,222	21.68	129	0	0	0	65.8	6.67	55.8	34.2	6.67	44.2	0	0	0	0	0	0
Axiom Bk Deltona	0	0	0	180	0	0	0	0	0	0	100	0	100	0	0	0	0	0	0
Axiom Bk Lakeland	0	0	0	221	0	0	0	12.6	0	17.6	87.4	0	82.4	0	0	0	0	0	0
Axiom Bk Palm Bay	2	1,373	24.36	68	0	0	0	100	0	100	0	0	0	13.33	0	0	0	0	0
Axiom Bk Jacksonville	0	0	0	999	0	0	0	0	0	0	31.8	0	22.3	68.2	0	77.7	0	0	0
Axiom Bk Orlando	10	2,852	5	81,146	0.5	0	0.2	20	33.33	15.5	43.8	6.67	44.3	35.7	26.67	39.9	0	0	0
Axiom Bk Tampa	1	190	3.37	45,926	3.2	0	2	18.9	0	14.2	36.8	6.67	34.6	41.1	0	49.1	0	0	0
Axiom Bk Ocala	0	0	0	9,526	0	0	0	13	0	9.4	73.1	0	75.4	13.9	100	15.2	0	0	0
<b>Total</b>	<b>15</b>	<b>5,637</b>	<b>100</b>	<b>138,195</b>	<b>1.3</b>	<b>0</b>	<b>0.8</b>	<b>18.8</b>	<b>40</b>	<b>14.6</b>	<b>45</b>	<b>20</b>	<b>43.2</b>	<b>34.9</b>	<b>4</b>	<b>41.4</b>	<b>0</b>	<b>0</b>	<b>0</b>

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available Due to rounding, totals may not equal 100.0

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Axiom Bk Northport	--	-	--	0	0	--	0	100	--		0	--		0	--	0	0	--	0
Axiom Bk DeLtona	--	-	--	0	0	--	0	0	-- <sup>0</sup>		100	-- <sup>0</sup>		0	--	0	0	--	0
Axiom Bk Lakeland	--	-	--	0	0	--	0	11.2	-- <sup>0</sup>		88.8	-- <sup>0</sup>		0	--	0	0	--	0
Axiom Bk Palm Bay	--	-	--	0	0	--	0	100	-- <sup>0</sup>		0	-- <sup>0</sup>		0	--	0	0	--	0
Axiom Bk Jacksonville	--	-	--	0	0	--	0	0	-- <sup>0</sup>		57.5	-- <sup>0</sup>		42.5	--	0	0	--	0
Axiom Bk Orlando	--	-	--	0	1	--	0	21.1	-- <sup>0</sup>		39.1	-- <sup>0</sup>		38.8	--	0	0	--	0
Axiom Bk Tampa	--	-	--	0	3.3	--	0	17.8	-- <sup>0</sup>		31.8	-- <sup>0</sup>		46.9	--	0	0.2	--	0
Axiom Bk Okala	--	-	--	0	0.6	--	0	14.5	-- <sup>0</sup>		69.6	-- <sup>0</sup>		15.3	--	0	0	--	0
<b>Total</b>	--	-	--	<b>0</b>	<b>1.7</b>	--	<b>0</b>	<b>19.2</b>	-- <sup>0</sup>		<b>40.5</b>	-- <sup>0</sup>		<b>38.5</b>	--	<b>0</b>	<b>0.1</b>	--	<b>0</b>

0

0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-16
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Over all Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Axiom Bk Northport	2	1,222	21.68	114	39.5	0	0	21.5	0	0	14.3	0	0	24.7	0	0	0	0	0
Axiom Bk Deltona	0	0	0	169	23.8	0	0	15.1	0	0	26.3	0	0	34.8	0	0	0	0	0
Axiom Bk Lakeland	0	0	0	182	21.5	0	0	21.2	0	0	20.1	0	0	37.3	0	0	0	0	0
Axiom Bk Palm Bay	2	1,373	24.36	36	28.7	0	0	29.1	0	0	25.2	0	0	17.1	0	0	0	0	0
Axiom Bk Jacksonville	0	0	0	886	12.3	0	0	14.9	0	0	19.9	0	0	52.9	0	0	0	0	0
Axiom Bk Orlando	10	2852	50.59	70,097	20.1	0	0	18.6	0	0	20.8	0	0	40.5	27.3	0	0	72.7	0
Axiom Bk Tampa	1	190	3.37	38,701	20.8	0	0	17.3	0	0	18.5	0	0	43.4	0	0	0	100	0
Axiom Bk Ocala	0	0	0	8,197	18.1	0	0	19.8	0	0	22.8	0	0	39.3	100	0	0	0	0
<b>Total</b>	<b>15</b>	<b>5,637</b>	<b>100</b>	<b>118,382</b>	<b>20.1</b>	<b>0</b>	<b>0</b>	<b>18.3</b>	<b>0</b>	<b>0</b>	<b>20.2</b>	<b>0</b>	<b>0</b>	<b>41.3</b>	<b>30.8</b>	<b>0</b>	<b>0</b>	<b>69.2</b>	<b>0</b>

Source: 2010 U.S. Census ; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** **2017**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Axiom Bk Northport	-	-	--	0	32.7	--	0	29.3	--		16.3	--	0	21.7	--		0	--	
Axiom Bk Deltona	-	-	--	0	14.8	--	0	21.2	0	--	23.1	--	0	40.9	0	--	0	0	--
Axiom Bk Lakeland	-	-	--	0	20.9	--	0	18.9	0	--	19.4	--	0	40.7	0	--	0	0	--
Axiom Bk Palm Bay	-	-	--	0	28.9	--	0	30.3	0	--	29.9	--	0	10.9	0	--	0	0	--
Axiom Bk Jacksonville	-	-	--	0	13.7	--	0	15.7	0	--	19.2	--	0	51.4	0	--	0	0	--
Axiom Bk Orlando	-	-	--	0	21.5	--	0	18.1	0	--	19.2	--	0	41.2	0	--	0	0	--
Axiom Bk Tampa	-	-	--	0	21.9	--	0	16.8	0	--	17.7	--	0	43.6	0	--	0	0	--
Axiom Bk Ocala	-	-	--	0	19.3	--	0	19.5	0	--	21.6	--	0	39.7	0	--	0	0	--
<b>Total</b>	-	-	--	<b>0</b>	<b>21.4</b>	--	<b>0</b>	<b>17.8</b>	0	--	<b>19</b>	--	<b>0</b>	<b>41.9</b>	0	--	<b>0</b>	0	--

Source: 2015 ACS Census ; 01/01/2017 - 12/31/2017 Bank Data, 2017 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

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Table Q: AA Distribution of Loans to Small Businesses by Income Category of the Geography																			2015-16
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
Orlando	13	45,927	65	85,062	0.6	0.0	0.0	23.4	38.5	0.0	38.5	15.4	0.0	37.4	46.2	0.0	0.0	0.0	0.0
<i>Source: 2016 D&amp;B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0</i>																			

Table Q: AA Distribution of Loans to Small Businesses by Income Category of the Geography																			2017
AA:	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
Orlando	7	24,665	35	103,881	1.5	0.00	0.0	25.0	14.3	0.0	30.0	57.1	0.0	40.0	28.6	0.0	0.0	0.0	0.0
<i>Source: 2017 D&amp;B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0</i>																			

Table R: AA Distribution of Loans to Small Businesses by Gross Annual Revenues											2015-16
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
Orlando	13	45,927	65	50,719	82.4	30.8	0.0	3.2	69.2	11.1	0.00

*Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*

Table R: AA Distribution of Loans to Small Businesses by Gross Annual Revenues											2017
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
Orlando	7	24,665	35	103,881	90.1	42.9	0.0	3.4	57.1	6.5	0.00

*Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2016 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0*