



PUBLIC DISCLOSURE

September 17, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

BankUnited, National Association
Charter Number 25028

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Miami Lakes, FL 33016

Office of the Comptroller of the Currency

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

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Overall CRA Rating

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

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

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

* The lending Test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to assessment area credit needs;
- Overall, the geographic distribution of loans reflects good penetration throughout the assessment areas;
- The distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different sizes;
- The institution is a leader in making community development loans;
- The institution has an excellent level of qualified community development investments and grants;
- Delivery systems are accessible to geographies and individuals of different income levels in its assessment areas; and
- The institution provides a relatively high level of community development services.

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.

Combined Statistical Area (CSA): As defined by Office of Management and Budget, if specified criteria are met, adjacent Metropolitan and Micropolitan Statistical Areas, in various combinations, may become the components of a set of complementary areas called Combined Statistical Areas. A Combined Statistical Area may be comprised of two or more Metropolitan Statistical Areas, a Metropolitan Statistical Area and a Micropolitan Statistical Area, two or more Micropolitan Statistical Areas, or multiple Metropolitan and Micropolitan Statistical Areas that have social and economic ties as measured by commuting, but at lower levels than are found among counties within Metropolitan and Micropolitan Statistical Areas.

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 refinancing, 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

BankUnited, National Association (“BankUnited” or “bank”) is an interstate bank headquartered in Miami Lakes, Florida, and is a wholly owned subsidiary of BankUnited Inc. BankUnited conducts business in the states of Florida (FL) and New York (NY). Since the previous CRA evaluation, dated September 21, 2015, BankUnited grew from \$19.1 billion in assets to \$30.3 billion as of December 31, 2017. The growth was accomplished without any merger or acquisition activity.

As of December 31, 2017, net loans and leases of \$21.3 billion represented 70.4 percent of total assets. Loan portfolio composition was 65.9 percent real estate, 15.6 percent commercial and industrial, and 18.5 percent all other loans. The bank also held total deposits of \$22.1 billion and Tier one capital of \$3.1 billion.

The bank has 93 full service branches and 57 deposit-taking automated teller machines (ATMs) located in six assessment areas (AAs) throughout Florida and New York. BankUnited opened four branches and closed 17 during the evaluation period. Of the four branches opened during the evaluation period, the Wynwood and Tamarac branches were opened in low- and moderate-income (LMI) tracts, respectively. Of the 17 closed branches during the evaluation period, two were located in moderate-income tracts, one of which was relocated to the new Tamarac branch in a moderate-income tract. None of the closed branches were in low-income tracts.

BankUnited's business strategy focuses on relationship-driven commercial banking with an emphasis on small- and middle-market businesses, their executives, and consumers. Loan origination during the evaluation period was centered in the commercial portfolio and consisted of small business loans, commercial real estate, equipment loans and leases, lines and letters of credit, and consumer loans. The bank originated 1-4 family residential mortgage loans for the first half of the evaluation period. BankUnited formally ceased originating residential mortgages on January 13, 2016 and closed their pipeline of loans in September 2016. The bank continues to purchase performing residential loans through correspondent channels on a national basis. BankUnited offers traditional deposit products ranging from checking accounts, money market accounts, savings accounts, and certificates of deposit.

There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its AAs. The bank received a “Satisfactory” rating in its previous CRA evaluation dated September 21, 2015.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) assesses the bank's performance under the large institution Lending, Investment, and Service Tests. The evaluation period for the Lending, Investment, and Service Tests, and community development (CD) loans, investments, and services is January 1, 2015 to December 31, 2017.

In evaluating the bank's lending performance, we reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) and small loans to businesses reported under the Community Reinvestment Act (CRA) for calendar years 2015 through 2017. The bank originated no small farm loans during the review period. We used separate analysis periods for 2015-2016 and 2017 for the geographic and borrower distribution in the Lending Test due to the 2015 US Census American Community Survey (ACS) update that went into effect on January 1, 2017.

Selection of Areas for Full-Scope Review

We selected the Miami-Fort Lauderdale-Port St. Lucie, FL CSA (Miami CSA) and North Port-Sarasota, FL CSA (North Port CSA) in Florida and the New York-Newark CSA (New York CSA) for full-scope reviews. Refer to the "Scope" section under each state for details regarding how the areas were selected. See the tables in appendix A for more information.

Ratings

The bank's overall rating is a blend of state ratings. Florida was given greater weight due to a higher level of deposits and loans.

In this evaluation, we placed more emphasis on the bank's performance in 2015-2016 than its performance in 2017 to reach our conclusions as it represented the longer time period within the three-years of the performance evaluation.

The state ratings are based primarily on the areas receiving full-scope reviews. Refer to the "Scope" section under each State Rating section for details regarding how AAs were weighted in arriving at the overall state ratings.

Inside/Outside Ratio

The bank originated an adequate percentage of loans inside the AAs. This analysis was performed on the overall bank level. The bank originated and purchased 49.9 percent of home mortgage loans and small loans to businesses inside the AAs consisting of 79.4 percent of their small business loans and 30.0 percent of their home mortgage loans during the evaluation period. This performance is considered adequate, given that the bank's core lending consists of commercial loans and the bank's strategy to diversify its home mortgage portfolio by purchasing home mortgages on a nationwide basis.

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 [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Florida

CRA Rating for Florida:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	High Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to credit needs in its assessment areas, taking into account the number and amount of home mortgage and small business loans in its assessment areas;
- An overall good geographic distribution of loans as evidenced by good home mortgage geographic distribution and excellent small business distribution;
- The institution is a leader in making community development loans;
- An excellent level of qualified investments that provided good responsiveness to community needs in the AA;
- Service delivery systems are accessible to geographies and individuals of different income levels in its assessment areas;
- A relatively high level of CD services that were responsive to community needs.

Description of Institution's Operations in Florida

BankUnited has five AAs in the state of Florida. The bank offers a full range of loan and deposit products and services through 87 full service branches within Florida. During the evaluation period, 70.1 percent of bank-wide deposits and 78.4 percent of originated and purchased loans were from Florida. As of June 30, 2017, BankUnited held deposits totaling \$14.7 billion in Florida, which represented a 2.6 percent market share and ranked the bank number 10 out of 228 institutions with operations in the Florida AAs. The state's largest depository institutions are Bank of America, NA, Wells Fargo, NA, and SunTrust Bank who hold a combined 42.1 percent market share in the Florida AAs.

The most significant AA in the state, in terms of lending and deposits, is the Miami CSA.

The Miami CSA has 64 full service branches, and accounts for 87 percent of rated area deposits and 73.5 percent of rated area loans originated and purchased during the evaluation period. BankUnited opened three branches, one in a low-income geography, one in a moderate-income geography, and one in a middle-income geography in this AA. BankUnited closed 13 branches with two located in moderate-income geographies, seven in middle-income geographies, and four in upper-income geographies in this AA.

The North Port CSA has five full service branches and accounts for 3.9 percent of BankUnited's rated area deposits and 3.8 percent of BankUnited's rated area loans originated and purchased during the evaluation period. BankUnited did not open any branches and closed one branch located in a middle-income geography in this AA.

The Cape Coral CSA has five full service branches and accounts for 3.7 percent of the bank's rated area deposits and 7.0 percent of the bank's rated area loans originated and purchased during the evaluation period. BankUnited opened one branch in a middle-income geography and closed two branches located in middle and upper-income geographies in this AA.

The Orlando MSA has four full service branches and accounts for 1.4 percent of the bank's rated area deposits and 8.3 percent of the bank's rated area loans originated and purchased during the evaluation period. BankUnited did not open any branches and closed one branch located in a middle-income geography in this AA.

The Tampa MSA has nine full service branches and accounts for 4.0 percent of the bank's rated area deposits and 7.4 percent of the bank's rated area loans originated and purchased during the evaluation period. BankUnited neither opened nor closed branches in the AA during the evaluation period.

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

Scope of Evaluation in Florida

The Miami and North Port CSAs received full-scope evaluations. The Cape Coral, Orlando, and Tampa areas received limited-scope evaluations. The ratings for Florida were primarily based on the results of the full-scope reviews, but were also influenced by performance in the limited-scope areas. Refer to appendix A for more information on the composition of the bank's AAs.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Florida is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Miami and North Port areas is good. The bank's mortgage and small business performance was adequate. The bank's level of CD lending is excellent and had a significantly positive impact on the overall lending test for Florida.

Lending Activity

Based on the data in Lending Volume Table 1 and the following performance context considerations, we concluded that lending activity reflects adequate responsiveness to assessment area credit needs. The bank originated an adequate volume of loans in the AA

relative to its capacity based on deposits, competition, market presence, and business strategy.

Miami CSA

The bank is ranked 182 out of 1,040 mortgage lenders with a market share of 0.06 percent, placing it in the top 18th percentile of all mortgage lenders in the AA. The mortgage market in the Miami CSA is highly competitive with competition consisting of both local and national institutions of different sizes. The five largest mortgage lenders hold 24.6 percent of the market. BankUnited exited the mortgage origination business in 2016 but continues to diversify their residential mortgage portfolio through nationwide bulk purchases.

The bank is ranked 29 out of 250 small business lenders with 0.22 percent market share, placing it in the top 12th percentile of small business lenders in the AA. The market consists of both local and national lenders including megabanks and issuers of small business credit cards. The five largest small business lenders hold 71.12 percent of the market and all are issuers of small business credit cards. BankUnited is not an issuer of small business credit cards.

The bank originated an adequate volume of loans in the AA. The proportion of bank loans is weaker than the proportion of bank deposits in the AA. The bank's market share and ranking in mortgage loans and small business loans is weaker than the bank's market share and ranking in deposits. This performance is considered adequate based on the bank's capacity, competition, market presence, and business strategy.

BankUnited is the sixth largest deposit taking institution with a market share of 5.22 percent, placing it in the sixth percentile of all depository institutions. The Miami CSA has 103 deposit-taking institutions. The five largest deposit taking institutions, based on deposit market share, hold 54 percent of the deposit market in the Miami CSA.

North Port CSA

The bank is ranked 237 out of 856 mortgage lenders with a market share of 0.03 percent, placing it in the top 28th percentile of all mortgage lenders in the AA. The mortgage market in the North Port CSA is highly competitive with competition consisting of both local and national institutions of different sizes. The five largest mortgage lenders hold 23.62 percent of the market.

The bank is ranked 50 out of 150 small business lenders with 0.06 percent market share, placing it in the top 33rd percentile of small business lenders in the AA. The market consists of both local and national lenders including megabanks and issuers of small business credit cards. The five largest small business lenders hold 62.00 percent of the market and all are issuers of small business credit cards. BankUnited is not an issuer of small business credit cards.

The bank originated an adequate volume of loans in the AA. The proportion of bank loans is weaker than the proportion of bank deposits in the AA. The bank's market share and ranking in mortgage loans and small business loans is weaker than the bank's market share and ranking in deposits. This performance is considered adequate based on the bank's capacity, competition, market presence, and business strategy.

BankUnited is the tenth largest deposit taking institution with a market share of 2.37 percent, placing it in the 24th percentile of all depository institutions. The North Port CSA has 42 deposit-taking institutions. The five largest deposit taking institutions, based on deposit market share, hold 58.74 percent of the deposit market in the North Port CSA.

Distribution of Loans by Income Level of the Geography

Based on the data in Tables O and Q the geographic distribution of loans reflects good penetration throughout the assessment area.

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, the geographic distribution of the bank's home mortgage loan originations and purchases is good.

Miami CSA

During the 2015-2016 evaluation period, the distribution of home mortgage lending in LMI geographies is excellent. The proportion of loans was stronger than the proportion of owner-occupied housing units in low-income geographies and comparable to the proportion of owner-occupied housing units in moderate-income geographies. The bank's home mortgage lending is stronger than the aggregate distribution of loans in both LMI geographies.

During the 2017 evaluation period, the distribution of home mortgage lending in LMI geographies is good. The proportion of loans was comparable to the proportion of owner-occupied housing units in LMI geographies. The bank's home mortgage lending is comparable to the aggregate distribution of loans in low-income geographies and stronger than the aggregate distribution of loans in moderate-income geographies.

North Port CSA

During the 2015-2016 evaluation period, the distribution of home mortgage lending in low- and moderate-income geographies is adequate. The bank did not originate any loans located in low-income geographies during the evaluation period. The proportion of loans was comparable to the proportion of owner-occupied housing units in moderate-income geographies. The bank's home mortgage lending is stronger than the aggregate distribution of loans in moderate-income geographies. Additional weight was placed on the bank's performance in moderate-income geographies as the number and proportion of owner-occupied housing units in low-income geographies is very low, limiting lending opportunities for the bank.

During the 2017 evaluation period, the bank did not originate or purchase a sufficient number of loans to perform a meaningful analysis of the data.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, the geographic distribution of the bank's originations and purchases of small loans to businesses is excellent.

Miami CSA

During the 2015-2016 evaluation period, the distribution of small loans to businesses in LMI geographies is excellent. The proportion of the bank's small loans to businesses was significantly stronger than the proportion of businesses in those geographies and significantly stronger than the aggregate distribution of loans in those geographies.

During the 2017 evaluation period, the distribution of small loans to businesses in LMI geographies is excellent. The proportion of the bank's small loans was significantly stronger than the proportion of businesses those geographies and significantly stronger than the aggregate distribution of loans in those geographies.

North Port CSA

During the 2015-2016 evaluation period, the distribution of small loans to businesses in LMI geographies is good. The bank did not originate or purchase any loans to small businesses located in low-income geographies. The proportion of loans in moderate-income geographies was significantly stronger than the proportion of businesses in those geographies and significantly stronger than the aggregate distribution of loans in those geographies. Additional weight was placed on the bank's performance in moderate-income geographies, as the number and volume of businesses located in low-income geographies is very low, limiting the lending opportunities for the bank.

During the 2017 evaluation period, the distribution of small loans to businesses in LMI geographies is good. The bank did not originate or purchase any loans to small businesses located in low-income geographies. The proportion of loans in moderate-income geographies was significantly stronger than the proportion of businesses in those geographies and significantly stronger than the aggregate distribution of loans in those geographies. Additional weight was placed on the bank's performance in moderate-income geographies, as the number and volume of businesses located in low-income geographies is very low, limiting the lending opportunities for the bank.

Lending Gap Analysis

We performed a lending gap analysis that included an analysis of maps showing the distribution of branches, applications, and loans. We did not identify any unexplained conspicuous gaps in the full scope assessment areas.

Distribution of Loans by Income Level of the Borrower

Based on the data in Tables P and R the borrower distribution of loans reflects good penetration throughout the assessment area.

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, the borrower distribution of the bank's origination and purchases of home mortgage loans is adequate.

Miami CSA

During the 2015-2016 evaluation period, the bank's distribution of home mortgage loans to low- and moderate-income borrowers is adequate. The proportion of loans was significantly weaker than the proportion of low-income families and comparable to the proportion of moderate-income families. The proportion of loans was significantly stronger than the aggregate distribution of loans to those borrowers.

During the 2017 evaluation period, the bank's distribution of home mortgage loans to LMI borrowers is adequate. The proportion of loans was significantly weaker than the proportion of low-income families and weaker than the proportion of moderate-income families. The proportion of loans was weaker than the aggregate distribution to low-income borrowers and comparable to the aggregate distribution to moderate-income borrowers.

Although the proportion of loans to low-income borrowers was significantly weaker than the proportion of low-income families, the bank and industry performance was negatively impacted by the ratio of median housing values (MHV) to income in the AA. The AA's MHV is \$222 thousand. The maximum income level for low-income borrowers in the AA is between \$24,632 and \$32,957, making the median housing value 9.01 times and 6.73 times greater than the maximum low-income level. Please refer to the AA Market Profile Table A for further details. The bank's performance was negatively impacted by the significant number of purchased loans with unavailable income. Purchased loans totaled 124 during the 2015-2016 evaluation period and 88 during the 2017 evaluation period, representing 31.6 percent and 83.8 percent of total loans, respectively.

North Port CSA

During the 2015-2016 evaluation period, the bank's distribution of home mortgage loans to LMI borrowers is adequate. The bank did not originate any loans to low- or moderate-income borrowers. This performance is considered adequate when considering the significant number of purchased loans with unavailable income. Purchased loans totaled 18 during the 2015-2016 evaluation period, representing 81.8 percent of total loans.

During the 2017 evaluation period, the bank did not originate or purchase a sufficient volume of loans to perform a meaningful analysis of the data.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, the borrower distribution of the bank's originations and purchases of small loans to businesses is adequate.

Miami CSA

During the 2015-2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is adequate. The proportion of loans was weaker than the proportion of small businesses and comparable to the aggregate distribution of loans to those businesses.

During the 2017 evaluation period, the distribution of the bank's small loans to businesses by revenue is adequate. The proportion of loans was weaker than the proportion of small businesses and comparable to the aggregate distribution of loans to those businesses.

North Port CSA

During the 2015-2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is adequate. The proportion of loans was weaker than the proportion of small businesses and comparable to the aggregate distribution of loans to those businesses.

During the 2017 evaluation period, the distribution of the bank's small loans to businesses by revenue is adequate. The proportion of loans was weaker than the proportion of small businesses and weaker than the aggregate distribution of loans to those businesses.

Community Development Lending

Based on the data in Table 1 and the following performance considerations, BankUnited's level of CD lending in the Miami CSA is excellent.

Miami CSA

BankUnited is a leader in making CD loans in the Miami CSA, and the activity has a positive impact on lending performance in the AA. During the evaluation period, the bank originated 33 loans totaling \$192 million. The bank's level of CD lending represents 10.10 percent of allocated tier one capital. BankUnited effectively helped meet community credit needs through its CD lending. The bank's CD lending supported the development and retention of affordable housing, the revitalization and stabilization of LMI areas, and organizations providing community services to LMI individuals and families.

Examples of the bank's CD loans include:

- A \$56.2 million loan to refinance existing debt to remodel educational center/daycare locations, fund equipment upgrades, and finance other capital projects to an organization which serves LMI students.

- A \$45.5 million loan to refinance an affordable housing multifamily rental property that offers rents below HUD's Fair Market Rent to LMI individuals and families.
- A \$9 million loan for a shopping plaza located in a moderate-income tract which offers community services such as job counseling and low wage job opportunities for LMI individuals.

North Port CSA

BankUnited is a leader in making CD loans in the North Port CSA, and the activity has a positive impact on lending performance in the AA. During the evaluation period, the bank originated 2 loans totaling \$11 million. BankUnited's level of CD lending represents 13.12 percent of allocated tier one capital. BankUnited effectively helped meet community credit needs through its CD lending. The bank's CD lending supported the development and retention of affordable housing, the revitalization and stabilization of LMI areas, and organizations providing community services to LMI individuals and families.

Examples of the bank's CD loans include:

- A \$10.9 million loan to purchase an affordable housing multifamily rental property that offers rents below HUD's Fair Market Rent to LMI individuals and families.
- A \$200 thousand unsecured line of credit to a Community Development Financial Institutions Fund (CDFI Fund) which is dedicated to providing business and funding opportunities for the long-term growth and success of small businesses.

Product Innovation and Flexibility

Innovative and flexible loan programs offered through the bank's Community Housing Assistance Mortgage Program (CHAMP) were effective in helping the bank address community credit needs. The bank originated an adequate number of loans under these programs.

The CHAMP program was introduced in 2012 to provide financing for LMI borrowers or to purchase or refinance properties located in low- or moderate-income geographies within the bank's AA. The program allows for a maximum loan-to-value (LTV) of 80 percent and was designed to work with local municipal programs to provide additional financing. The program was redesigned in 2014 to offer a Fixed Rate CHAMP subordinate mortgage product; the revised program offers down payment assistance in the form of a subordinate mortgage provided concurrently with a CHAMP first lien mortgage. This allows for higher combined LTV ratios, no mortgage insurance, principal forgiveness for low-income borrowers (2.5 percent of unpaid principal balances annually), and terms up to 30 years.

The bank has also made warehouse lines of credit to local affordable housing organizations in Florida to originate residential mortgages underwritten to CHAMP guidelines. The partners source applicants while BankUnited employees underwrite and make the credit decisions on

the loans. The community partners originate and fund the loan through the warehouse line of credit and BankUnited subsequently purchases the loans.

Total bank-wide CHAMP volume for the three year evaluation period totaled 101 loans for \$11.09 million. A local affordable housing organization originated 18 loans for \$1.56 million and BankUnited originated 53 loans for \$5.95 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Cape Coral, Orlando, and Tampa AAs is consistent with the bank's overall "High Satisfactory" performance under the lending test in Florida.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Based on the data in Table 14 and the following performance context considerations, the bank's level of qualified CD investments, contributions and grants is excellent.

Miami CSA

Considering the large number of competitors in the market, including some of the largest banks in the country, and a highly competitive market for qualified investments, BankUnited's level of qualified CD investments and grants in the Miami CSA is excellent. During the evaluation period, the bank made 91 investments and grants totaling \$98 million. Including prior period investments the bank has \$139.6 million in total CD investments representing 7.36 percent of allocated tier one capital for the AA.

During the evaluation period, the bank made one CDFI investment of \$1 million and 18 mortgage-backed security (MBS) investments totaling \$94 million. A substantial majority of the dollar volume of the bank's current and prior period investments focuses on affordable housing, a primary credit need in the AA. Grants were made to organizations that provided affordable housing, financial literacy and education, economic development, or other community service needs for LMI individuals and families.

Examples of qualified investments in this AA include:

- BankUnited invested \$1 million in an equity equivalent (EQ2) investment in a MicroLending Fund from a local community development organization that supports small business financing for LMI and economically disadvantaged communities. This investment is considered innovative as BankUnited demonstrated leadership by being the first bank to provide the matching capital funds to help establish and administer the program.
- A \$22.5 thousand grant to an organization that offers a wide range of financial services and education to LMI students in Miami-Dade County.

North Port CSA

Based on the data in Table 14 and the following performance context considerations, the bank's level of qualified CD investments, contributions and grants is significant. During the evaluation period, BankUnited made 22 investments and grants totaling \$2.4 million. Total investments including prior period investments are \$3.46 million representing 4.08 percent of allocated tier one capital for the AA.

During the evaluation period, the bank invested in eight mortgage-backed security investments totaling \$2.3 million. The bank's investments were comprised of government sponsored mortgage-backed securities, which were responsive to identified affordable housing needs in the AA. Grants were made to organizations that provided affordable housing, financial literacy and education, economic development, or other community service needs for LMI individuals and families.

The bank made a \$7.5 thousand grant to two Florida Small Business Development Center Networks (SBDCs) that support business consultants who provide training and technical assistance to small businesses located in Manatee, Sarasota, and Charlotte Counties.

The bank made two grants totaling \$5 thousand to an organization that provides training opportunities for small businesses and basic financial literacy and education to LMI students.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the investment test in the Cape Coral AA is consistent with the bank's overall "Outstanding" rating in the state of Florida. The bank's performance under the investment test in the Orlando and Tampa AAs is inconsistent with the bank's overall "Outstanding" rating in the state of Florida and is given less weighting due to the bank's limited scope of operations in these AAs. The bank's ratio of investments to allocated tier one capital in these AAs was weaker than the overall performance in the state, but is considered good.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Based on the data in Table 15, the bank's delivery systems and CD services are good.

Retail Banking Services

Retail banking services are good. Refer to Table 15 for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs.

Miami CSA

BankUnited's service delivery systems are accessible to geographies and individuals of different income levels in its assessment area. The bank had a sufficient number of branches and ATMs, reflected in Table 15, in LMI areas compared to the population distribution. In addition, the bank has a significant number of the bank's deposits in LMI areas compared to the population distribution.

BankUnited's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies or to LMI individuals. The opening and closing of branches, reflected in Table 15, had a limited impact on the delivery of services across the community. Two branches were closed in moderate-income geographies, with one relocated to another moderate-income geography. The bank opened one branch in a low-income geography.

BankUnited makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provide additional delivery availability and access to banking services to both retail and business customers.

BankUnited's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly to LMI. The bank maintains standard business hours and offers traditional banking products, mortgage, consumer and small business lending and services at all branch locations in the AA.

North Port CSA

BankUnited's service delivery systems are accessible to geographies and individuals of different income levels in its assessment area. The bank had a sufficient number of branches, reflected in Table 15 in LMI areas compared to the population distribution. The percentage of branches in LMI geographies was comparable to the percentage of the population in moderate-income geographies. There was one branch located in moderate-income geography. There were no branches located in low-income geographies. The bank does not operate any ATMs in low- or moderate-income CTs in the AA. The branch distribution in the AA was augmented by a significant number of the bank's deposits in LMI areas compared to the population distribution.

BankUnited's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies or to LMI individuals. No branches were opened during the evaluation period. The bank closed one branch in a middle-income CT during the evaluation period.

BankUnited's makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provide additional delivery availability and access to banking services to both retail and business customers.

The bank's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly to LMI. The bank maintains standard business hours and offers traditional banking products, mortgage, consumer and small business lending and services at all branch locations in the AA.

Community Development Services

Community development services are good.

Miami CSA

Based on the level of community development services and the following performance context considerations, BankUnited provides a relatively high level of community development services.

Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 212 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.

Bank employees conducted presentations, taught courses, and provided technical assistance on financial and banking related matters to community groups and LMI individuals and small business owners. These services exhibited excellent responsiveness to identified needs in the AA. During the evaluation period, bank employees participated in 113 organizations focused on affordable housing, financial literacy, and providing small business classes with a total of 2,989 hours.

North Port CSA

Based on the level of community development services and the following performance context considerations, BankUnited provides an adequate level of community development services.

Community development services were effective and responsive in helping the bank address community needs. The bank conducted or supported an adequate number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 8 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.

Bank employees conducted presentations, taught courses, and provided technical assistance on financial and banking related matters to community groups and LMI individuals and small business owners. These services exhibited excellent responsiveness to identified needs in the AA. During the evaluation period, bank employees participated in 8 organizations focused on affordable housing, financial literacy, and providing small business classes with a total of 382 hours.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Cape Coral and Orlando AAs is consistent with the bank's overall "High Satisfactory" performance under the service test in Florida. The bank's performance under the service test in the Tampa AA is inconsistent with the bank's overall "High Satisfactory" performance under the service test in Florida. Weaker performance is due to branch distribution in the AA and is given less weighting due to the bank's limited scope of operations in this AA.

State Rating

State of New York

CRA Rating for New York:	Satisfactory
The lending test is rated:	High Satisfactory
The investment test is rated:	Outstanding
The service test is rated:	Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to credit needs in its assessment areas, taking into account the number and amount of home mortgage and small business loans in its assessment area;
- An overall good geographic distribution of loans as evidenced by good home mortgage geographic distribution and good small business distribution;
- The institution is a leader in making community development loans;
- An excellent level of qualified investments that provided good responsiveness to community needs in the AA;
- A branch distribution that was reasonably accessible to essentially all portions of geographies and individuals of different income levels in the assessment area and;
- A relatively high level of CD services that were responsive to community needs.

Description of Institution's Operations in New York

BankUnited has one AA in the state of New York. The bank offers a full range of loan and deposit products and services in its AAs through 6 full service branches within New York. During the evaluation period, 29.9 percent of bank-wide deposits and 21.6 percent of originated and purchased loans were from New York. As of June 30, 2017, BankUnited held deposits totaling \$6.2 billion in New York, which represented a 0.37 percent market share and ranked the bank 25 out of 212 institutions with operations in New York. The state's largest depository institutions are JPMorgan Chase, NA, Citibank, NA, The Bank of New York Mellon, and HSBC Bank who hold a combined 53.98 percent market share in New York.

The New York CSA has 6 full service branches, and accounts for 100 percent of the rated area deposits and 100 percent of the rated area loans originated and purchased during the evaluation period. BankUnited neither opened nor closed any branches during the evaluation period.

Refer to the market profiles for the state of New York in appendix C for detailed demographics and other performance context information for assessment areas that received full-scope reviews.

Scope of Evaluation in New York

The New York CSA received a full-scope evaluation. The ratings for New York were primarily based on the results of the full-scope reviews.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in New York is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the New York CSA is good. The bank's mortgage and small business performance was adequate. The bank's level of CD lending is excellent and had a significantly positive impact on the overall lending test for New York.

Lending Activity

Based on the data in Lending Volume Table 1 and the following performance context considerations, we concluded that lending activity is adequate. The bank originated an adequate volume of loans in the AA relative to its capacity based on deposits, competition, market presence, and business strategy.

New York CSA

The bank is ranked 80 out of 453 mortgage lenders with a market share of 0.22 percent, placing it in the top 18th percentile of all mortgage lenders in the AA. The mortgage market in the New York CSA is highly competitive with competition consisting of both local and national institutions of different sizes. The five largest mortgage lenders hold 33.59 percent of the market. BankUnited exited the mortgage origination business in 2016 but continues to diversify their residential mortgage portfolio through nationwide bulk purchases.

The bank is ranked 25 out of 227 small business lenders with 0.06 percent market share, placing it in the top 11th percentile of small business lenders in the AA. The market consists of both local and national lenders including megabanks and issuers of small business credit cards. The five largest small business lenders hold 77.10 percent of the market and all are issuers of small business credit cards.

The proportion of bank loans is weaker than the proportion of bank deposits in the AA. The bank's market share and ranking in mortgage loans and small business loans is weaker than the bank's market share and ranking in deposits.

BankUnited is the 18th largest deposit taking institution with a market share of 0.05 percent, placing it in the 18th percentile of all depository institutions. The New York CSA has 99 deposit-

taking institutions. The five largest deposit taking institutions, based on deposit market share, hold 72.1 percent of the deposit market in the New York CSA.

Distribution of Loans by Income Level of the Geography

Based on the data in Tables O and Q the geographic distribution of loans reflects good penetration throughout the assessment area.

Home Mortgage Loans

Based on the data in Table O and the following performance context considerations, the geographic distribution of the bank's home mortgage loan originations and purchases is good.

During the 2015-2016 evaluation period, the distribution of home mortgage lending in LMI geographies is good. The proportion of loans was stronger than the proportion of owner-occupied housing units in low-income geographies and weaker than the proportion of owner-occupied housing units in moderate-income geographies. The bank's home mortgage lending is comparable to the aggregate distribution of loans in low-income geographies and weaker than the aggregate distribution of loans in moderate-income geographies.

During the 2017 evaluation period, the distribution of home mortgage lending in LMI geographies is good. The proportion of loans is stronger than the proportion of owner-occupied housing units in low-income geographies and weaker than the proportion of owner-occupied housing units in moderate-income geographies. The bank's home mortgage lending is stronger than the aggregate distribution of loans in low-income geographies and weaker than the aggregate distribution of loans in moderate-income geographies.

Small Loans to Businesses

Based on the data in Table Q and the following performance context considerations, the geographic distribution of the bank's originations and purchases of small loans to businesses is good.

During the 2015-2016 evaluation period, the distribution of small loans to businesses in LMI geographies is good. The proportion of the bank's small loans to businesses is comparable to the proportion of businesses in low-income geographies and was stronger than the proportion of businesses in moderate-income geographies. The proportion of small loans to businesses was weaker than the aggregate distribution of loans in low-income geographies and stronger than the aggregate distribution of loans in moderate-income geographies.

During the 2017 evaluation period, the distribution of small loans to businesses in LMI geographies is good. The proportion of the bank's small loans to businesses was stronger than the proportion of businesses in low-income geographies and weaker than the proportion of businesses in moderate-income geographies. The proportion of small loans to businesses was stronger than the aggregate distribution in low-income geographies and weaker than the aggregate distribution in moderate-income geographies.

Lending Gap Analysis

We performed a lending gap analysis that included an analysis of maps showing the distribution of branches, applications, and loans. We did not identify any unexplained conspicuous gaps in the full scope assessment areas.

Distribution of Loans by Income Level of the Borrower

Based on the data in Tables P and R the borrower distribution of loans reflects adequate penetration throughout the assessment area.

Home Mortgage Loans

Based on the data in Table P and the following performance context considerations, the borrower distribution of the bank's origination and purchases of home mortgage loans is poor.

During the 2015-2016 evaluation period, the bank's distribution of home mortgage loans to LMI borrowers is poor. The proportion of loans was significantly weaker than the proportion of LMI families. The proportion of loans is significantly weaker than the aggregate distribution of loans to those borrowers.

During the 2017 evaluation period, the bank's distribution of home mortgage loans to LMI borrowers is poor. The proportion of loans was significantly weaker than the proportion of LMI families. The proportion of loans was significantly weaker than the aggregate distribution of loans to those borrowers.

Although the proportion of loans to low-income borrowers was significantly weaker than the proportion of low-income families, the bank and industry performance was negatively impacted by the ratio of MHVs to income in the AA. The AA's MHV is \$608 thousand. The maximum income level for low-income borrowers in this AA is between \$36 thousand and \$54 thousand, making the MHV between 16.87 times and 11.23 times greater than the maximum low-income level. Please refer to the market profiles in appendix C for further details.

The bank's performance was negatively impacted by the significant number of purchased loans with unavailable income. Purchased loans totaled 343 during the 2015-2016 evaluation period and 130 during the 2017 evaluation period, representing 74.6 percent and 92.2 percent of total loans, respectively.

Small Loans to Businesses

Based on the data in Table R and the following performance context considerations, the borrower distribution of the bank's originations and purchases of small loans to businesses is adequate.

During the 2015-2016 evaluation period, the distribution of the bank's small loans to businesses by revenue is adequate. The proportion of loans was significantly weaker than the

proportion of small businesses and weaker than the aggregate distribution of loans to those businesses.

During the 2017 evaluation period, the distribution of the bank's small loans to businesses by revenue is adequate. The proportion of loans was significantly weaker than the proportion of small businesses and comparable to the aggregate distribution of loans to those businesses.

Community Development Lending

BankUnited is a leader in making CD loans in the AA, and the activity has a positive impact on lending performance in the AA. During the evaluation period, the bank originated 40 loans totaling \$184 million. The bank's level of CD lending represents 19.88 percent of allocated tier one capital. BankUnited effectively helped meet community credit needs through its CD lending. The bank's CD lending supported the development and retention of affordable housing, the revitalization and stabilization of LMI areas, and organizations providing community services to LMI individuals and families.

Examples of the bank's CD loans include:

- A \$15.2 million loan to purchase an affordable housing multifamily rental property that offers rents below HUD's Fair Market Rent to LMI individuals and families in the AA.
- A \$2 million loan to a nonprofit organization which provides affordable housing for LMI families and individuals with special needs.
- A \$500 thousand loan for a nonprofit organization that sponsors comprehensive housing preservation, economic development, community organizing, and youth and human services programs for LMI individuals.

Product Innovation and Flexibility

Innovative and flexible loan programs offered through the bank's Community Housing Assistance Mortgage Program (CHAMP) were effective in helping the bank address community credit needs. The bank originated an adequate number of loans under these programs.

The CHAMP program was introduced in 2012 to provide financing for LMI borrowers to purchase or refinance properties located in low- or moderate-income geographies within the bank's AA. The program allows for a maximum LTV of 80 percent and was designed to work with local municipal programs to provide additional financing. The program was redesigned in 2014 to offer a Fixed Rate CHAMP subordinate mortgage product; the revised program offers down payment assistance in the form of a subordinate mortgage provided concurrently with a CHAMP first lien mortgage. This allows for higher combined LTV ratios, no mortgage insurance, principal forgiveness for low-income borrowers (2.5 percent of unpaid principal balances annually), and terms up to 30 years.

The bank has also made warehouse lines of credit to a local affordable housing organization in New York City to originate residential mortgages underwritten to CHAMP guidelines. The

partners source applicants while BankUnited employees underwrite and make the credit decisions on the loans. The community partners originate and fund the loan through the warehouse line of credit and BankUnited subsequently purchases the loans.

Total bank wide CHAMP volume for the three year evaluation period totaled 101 loans for \$11.09 million. The local affordable housing organization originated 30 loans for \$3.58 million and BankUnited originated 53 loans for \$5.95 million.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Based on the data in Table 14 in appendix D and the following performance context considerations, the bank's level of qualified CD investments, contributions and grants is excellent. During the evaluation period, BankUnited made 67 investments and grants in the New York CSA, totaling \$76.9 million. The bank's total investments including prior period investments are \$81.5 million representing 8.49 percent of allocated tier one capital for the AA.

During the evaluation period, the bank invested in 15 MBS investments totaling \$76 million. The bank's investments were comprised of government sponsored mortgage-backed securities and housing development bonds, which were responsive to identified affordable housing needs in the AA. Grants were made to organizations that provided affordable housing, financial literacy and education, economic development, or other community service needs for LMI individuals and families.

Examples of qualified investments in this AA include:

- A \$15 thousand grant to a Community Development Corporation (CDC) that provides a variety of programs and services that include sustaining affordable homeownership, starting or expanding a small business, and building financial management skills.
- A \$10 thousand grant to an organization that teaches complex financial concepts to LMI students.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

Based on the data in Table 15, the bank's delivery systems and CD services are adequate.

Retail Banking Services

Refer to Table 15 for the facts and data used to evaluate the distribution of the bank's branch delivery system, branch openings and closings, and distribution of the bank's deposit-taking ATMs. Based on the data in Table 15, the bank's delivery systems and CD services are adequate.

BankUnited's service delivery systems are reasonably accessible to geographies and individuals of different income levels. The bank had a poor number of branches and ATMs, reflected in Table 15, in LMI areas compared to the population distribution. There were no branches located in low-income and one in moderate-income geographies. The branch distribution in the AA was augmented by a significant number of the bank's deposits in LMI areas compared to the population distribution.

BankUnited's record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies or individuals. No branches were closed during the evaluation period.

BankUnited makes good use of alternative delivery systems through debit cards and ATMs, telephone and online banking, electronic bill pay, and mobile banking options. These systems provide additional delivery availability and access to banking services to both retail and business customers.

BankUnited's hours and services do not vary in a way that inconveniences certain portions of the AA, particularly to LMI. The bank's maintains standard business hours and offers traditional banking products, mortgage, consumer and small business lending and services at all branch locations in the AA.

Community Development Services

Based on the level of community development services and the following performance context considerations, the provision of community development service is good.

The bank provides a relatively high level of community development services. The bank conducted or supported a significant number of CD services, consistent with its capacity and expertise to conduct specific activities. During the evaluation period, 37 bank employees either provided financial literacy training to LMI individuals or small business owners, held board or committee positions, and/or provided technical assistance to qualifying organizations commensurate with their bank job duties.

Bank employees conducted presentations, taught courses, and provided technical assistance on financial and banking related matters to community groups and LMI individuals and small business owners. These services exhibited excellent responsiveness to identified needs in the AA. During the evaluation, period bank employees participated in 14 organizations focused on affordable housing, financial literacy, and providing small business classes with a total of 687 hours.

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”).

Time Period Reviewed	Lending Test (excludes CD loans): (01/01/15 to 12/31/17) Investment and Service Tests and CD Loans: (01/01/15 to 12/31/17)	
Financial Institution	Products Reviewed	
BankUnited, National Association (BankUnited) Miami Lakes, Florida	Home Mortgage, Small Business, and Community Development Loans Retail and Community Development Services Qualified Investments	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Florida		
Miami CSA #370	Full-Scope	Portions of the Miami-Fort Lauderdale-Port St. Lucie, FL CSA comprised of Broward, Miami-Dade, Palm Beach, Martin, St. Lucie, and Indian River counties in FL.
North Port CSA #412	Full-Scope	Portion of the North Port-Sarasota, FL CSA comprised Manatee, Sarasota, and Charlotte counties in FL.
Cape Coral CSA #162	Limited-Scope	Portions of the Cape Coral-Fort Myers-Naples, FL CSA comprised of Lee and Collier Counties in FL.
Orlando MSA #36740	Limited-Scope	Portions of the Orlando-Kissimmee-Sanford, FL MSA comprised of Orange and Seminole counties in FL.
Tampa MSA #45300	Limited-Scope	Portions of the Tampa-St Petersburg-Clearwater, FL MSA comprised of Hillsborough and Pinellas counties in FL.
New York		
New York CSA #408	Full-Scope	Portions of the New York-Newark, NY-NJ-CT-PA CSA comprised of Suffolk, Kings, and New York counties in NY.

Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS BankUnited				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
BankUnited, NA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State:				
FLORIDA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
NEW YORK	High Satisfactory	Outstanding	Satisfactory	Satisfactory

(*) The lending test is weighted more heavily than the investment and service tests in the overall rating.

Appendix C: Community Profiles for Full-Scope Areas

State of Florida

Miami CSA #370

Table A – Demographic Information of the Assessment Area						
Assessment Area: Miami CSA #370						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,325	6.1	27.6	30.7	33.2	2.3
Population by Geography	6,443,458	5.6	28.1	33.3	32.6	0.4
Housing Units by Geography	2,777,572	5.3	26.7	32.9	34.8	0.3
Owner-Occupied Units by Geography	1,416,581	2.5	22.0	35.4	40.0	0.1
Occupied Rental Units by Geography	858,136	10.0	36.1	31.0	22.5	0.4
Vacant Units by Geography	502,855	5.3	24.1	29.2	40.9	0.5
Businesses by Geography	861,725	4.1	21.5	29.7	43.6	1.1
Farms by Geography	14,772	4.3	23.9	32.9	38.6	0.3
Family Distribution by Income Level	1,477,569	22.8	17.2	17.9	42.1	0.0
Household Distribution by Income Level	2,274,717	25.0	15.8	16.7	42.5	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach- Deerfield Beach, FL		\$61,809	Median Housing Value			\$221,822
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL MD		\$49,264	Median Gross Rent			\$1,178
Median Family Income MSA - 38940 Port St. Lucie, FL MSA		\$56,570	Families Below Poverty Level			13.2%
Median Family Income MSA - 42680 Sebastian-Vero Beach, FL MSA		\$58,448				
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Delray Beach, FL MD		\$65,914				
<i>Source: 2010 U.S. Census & 2015 ACS Census and 2017 D&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 Miami CSA consists of portions of the Miami-Fort Lauderdale-Port St. Lucie, FL CSA #370 that include: Broward County in the Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD #22744, Miami-Dade County in the Miami-Miami Beach-Kendall, FL MD #33124, Palm Beach County in the West Palm Beach-Boca Raton-Delray Beach, FL MD #48424, Martin and St. Lucie Counties in the Port St. Lucie MSA #38940, and Indian River County in the Sebastian-Vero Beach, FL MSA #42680.

The Miami CSA consists of 1,325 geographies with a population of 6,443,458. Of the 1,325 geographies, 81 geographies or 6.1 percent of the AA are classified as low-income, 366

geographies or 27.6 percent are classified as moderate-income, 407 geographies or 30.7 percent are classified as middle-income, 440 geographies or 33.2 percent are classified as upper-income, and 30 geographies or 2.3 percent have not been assigned an income classification. BankUnited operates a total of 64 branches and 43 ATMs in the Miami CSA, of which 6.3 and 25 percent are located in low- and moderate-income geographies, respectively.

As of June 30, 2017, 87 percent of BankUnited's total deposits in FL are from the Miami CSA. BankUnited is the sixth largest deposit taking institution with a market share of 5.22 percent, placing it in the sixth percentile of all depository institutions. The Miami CSA has 103 deposit-taking institutions. The five largest deposit taking institutions, based on deposit market share, hold 54 percent of the deposit market in the Miami CSA. Top depository competitors include Bank of America, Wells Fargo, JP Morgan Chase, Citibank, and SunTrust.

According to Moody's Analytics, economic expansion has been slow and wage growth in South Florida has been stagnant over the last two years. The area's unemployment rate of 4.7 percent and labor force participation rate of 61.7 percent have barely moved over the last 12 months.

Residential construction in South Florida has been at record lows, but is expected to increase because of projected population growth. South Florida has historically ranked high in population growth among most populated US metro areas, with the exception of 2017, when population growth unexpectedly dropped to 50,000. Moody's predicts that residential construction will surge in Miami, Fort Lauderdale, and West Palm Beach because the rate of homebuilding in the region is unsustainably low.

The projected gain in homebuilding will bring residential construction back to the level experienced 10 years prior to the housing bust, which was the level that the area was able to sustain during a normal expansion. South Florida cannot maintain its normal rate of population growth without greatly increasing residential construction. The foreclosures remaining from the Great Recession left a stock of housing inventory of vacant and distressed properties that was six times higher than the national average. That foreclosed inventory, which provided options for homebuyers and investors, is no longer available, and homebuilders will need to meet the demand.

Community contacts were made for Broward, Miami-Dade, Palm Beach, Indian River, Martin, and St. Lucie counties. Contacts made include HUD approved counseling centers, certified home ownership centers, nonprofit organizations, chambers of commerce, and small business development centers. Affordable housing and small business development were identified by almost all community contacts as the primary needs of the Miami CSA.

North Port CSA #412

Table A – Demographic Information of the Assessment Area						
Assessment Area: North Port CSA #412						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	210	1.9	23.3	48.6	26.2	0.0
Population by Geography	901,550	2.3	22.0	51.6	24.1	0.0
Housing Units by Geography	508,391	1.4	20.6	51.3	26.6	0.0
Owner-Occupied Units by Geography	278,012	0.8	16.8	54.7	27.6	0.0
Occupied Rental Units by Geography	103,754	3.8	32.2	47.1	16.9	0.0
Vacant Units by Geography	126,625	0.9	19.4	47.3	32.4	0.0
Businesses by Geography	106,438	1.1	18.6	49.1	31.2	0.0
Farms by Geography	3,198	1.5	20.5	47.1	31.0	0.0
Family Distribution by Income Level	241,750	19.0	19.4	21.1	40.5	0.0
Household Distribution by Income Level	381,766	22.8	17.2	18.3	41.6	0.0
Median Family Income MSA - 35840 North Port-Sarasota-Bradenton, FL MSA		\$62,814	Median Housing Value			\$200,760
Median Family Income MSA - 39460 Punta Gorda, FL MSA		\$54,478	Median Gross Rent			\$1,002
			Families Below Poverty Level			8.4%
<i>Source: 2010 U.S. Census & 2015 ACS Census and 2017 D&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 North Port CSA consists of portions of the North Port-Sarasota, FL CSA #412 that include: Manatee and Sarasota Counties in the North Port-Sarasota-Bradenton, FL MSA #35840 and Charlotte County in the Punta Gorda, FL MSA #39460.

The North Port CSA consists of 210 geographies with a population of 901,550. Of the 210 geographies, four geographies or 1.9 percent of the AA are classified as low-income, 49 or 23.3 percent are classified as moderate-income, 102 or 48.6 percent are classified as middle-income, and 55 or 26.2 percent are classified as upper-income. BankUnited operates a total of five branches and three ATMs in the North Port CSA, of which one branch is located in a moderate-income geography.

As of June 30, 2017, 3.89 percent of BankUnited's total deposits in FL are from the North Port CSA. BankUnited is the tenth largest deposit taking institution with a market share of 2.37 percent, placing it in the 24th percentile of all depository institutions. The North Port CSA has 42 deposit-taking institutions. The five largest deposit taking institutions, based on deposit market share, hold 58.74 percent of the deposit market share in the North Port CSA. Top depository competitors include Bank of America, Wells Fargo, SunTrust, Branch Banking and Trust, and JP Morgan Chase.

According to Moody’s Analytics, North Port is rebounding from Hurricane Irma in 2017. Job growth of near 3 percent is higher than both Florida and US averages. Rebuilding efforts are boosting wage growth; construction workers remain in high demand, as owners of residential and commercial properties make repairs. An aging population will ensure long-term sustainability of the local healthcare industries, which employ 15 percent of all workers. The top employers in the area include the Sarasota Memorial Health Care System, Publix Super Markets Inc., PGT Industries, Bealls Inc., and the Bon Secours Venice Hospital.

Community contacts were made with a local housing authority, chamber of commerce, and a government planning agency in Manatee, Sarasota, and Charlotte Counties. Contacts stated that there has been some improvement over the past three years with increases in residential construction and hotel hospitality growth, but there remains a need for small business lending, financial education, and general banking services targeted to LMI individuals.

State of New York

New York CSA #408

Table A – Demographic Information of the Assessment Area						
Assessment Area: New York CSA #408						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,372	12.0	29.1	30.8	25.9	2.2
Population by Geography	5,726,139	14.8	29.8	28.1	27.0	0.3
Housing Units by Geography	2,449,765	12.7	26.7	26.5	33.7	0.4
Owner-Occupied Units by Geography	837,186	3.6	20.5	41.3	34.5	0.2
Occupied Rental Units by Geography	1,338,868	19.3	31.1	17.5	31.6	0.5
Vacant Units by Geography	273,711	7.9	23.9	26.0	41.9	0.4
Businesses by Geography	451,863	7.4	18.3	24.5	46.7	3.0
Farms by Geography	4,865	3.1	20.8	45.4	29.9	0.7
Family Distribution by Income Level	1,263,586	29.4	16.1	16.9	37.6	0.0
Household Distribution by Income Level	2,176,054	30.0	14.2	15.5	40.3	0.0
Median Family Income MSA - 35004 Nassau County-Suffolk County, NY MD		\$108,193	Median Housing Value			\$607,762
Median Family Income MSA - 35614 New York-Jersey City-White Plains, NY-NJ MD		\$72,047	Median Gross Rent			\$1,442
			Families Below Poverty Level			14.0%
<i>Source: 2010 U.S. Census & 2015 ACS Census and 2017 D&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 New York CSA consists of portions of the New York-Newark, NY-NJ-CT-PA CSA #408 that include Kings and New York Counties in the New York-Jersey City-White Plains, NY-NJ MD #35614 and Suffolk County in the Nassau County-Suffolk County, NY MD #35004.

The New York CSA consists of 1,372 geographies with a population of 5,726,139. Of the 1,372 geographies, 165 or 12.0 percent are classified as low-income, 499 or 29.1 percent are classified as moderate-income, 423 or 30.8 percent are classified as middle-income, 355 or 25.9 percent are classified as upper-income, and 30 or 2.2 percent have not been assigned an income classification. BankUnited operates a total of six branches and three ATMs in the New York CSA, of which one branch is located in a moderate-income geography.

As of June 30, 2017, 100 percent of BankUnited's total deposits in NY are from the New York CSA. BankUnited is the 18th largest deposit taking institution with a market share of 0.05 percent, placing it in the 18th percentile of all depository institutions in the AA. The New York CSA has 99 deposit-taking institutions. The five largest deposit taking institutions, based on deposit market share, hold 72.1 percent of the deposit market in the New York CSA. Top depository competitors include JP Morgan Chase, The Bank of New York Mellon, HSBC Bank, and Goldman Sachs.

According to Moody's Analytics, the unemployment rate has been dropping in the New York CSA and has fallen below the state rate of unemployment. In 2017, the unemployment rate was 4.5 percent. Job growth is accelerating ahead of the national rate.

Due to the high cost of living in the New York CSA, there is a need for affordable housing, both for homeownership and rental housing. New York City is a rental market; 51 percent of housing units are renter-occupied. The single family market is beginning to recover in New York City and Long Island. The recent tax law changes may have an impact on the housing market due to the high property tax rate on Long Island. Mortgage delinquencies continue to decline. Foreclosures are less of an issue and homes are becoming available for purchase. In New York City, affordable multifamily rental is a continuous need. The building of numerous high-end condos throughout the AA has had an impact on multifamily development.

In the New York CSA, there is a large network of community based organizations and bank partners to support affordable housing, community services and small business development. In addition to 58 CDFIs, there are national and regional housing developers, small business development centers, economic development corporations, NeighborWorks affiliates, HUD housing counselors, state and local agencies and other nonprofit organizations.

Community contacts were made with four organizations. The organizations represented affordable housing and community services. Needs identified included more affordable housing for homeowners and renters, small business loans, affordable and high quality day care and afterschool programs, first time homebuyer programs, first-time homebuyer counseling, down payment assistance and financial literacy.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area; (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables P, R, and T, and part of Table V. Deposit data are compiled by the FDIC and are available as of June 30th 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 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. See Interagency Q&As 12(i) 5 and 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table D. Lending Inside and Outside of the Assessment Area** – Presents the percentage distribution of the number and dollar amount of loans originated and purchased by the bank over the evaluation period inside and outside of the assessment area(s) by loan type.
- 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.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See

Interagency Q&As 12(h) 6 and 7 for guidance on when a bank may receive positive CRA consideration for such investments.

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

Table 1. Lending Volume - Florida

LENDING VOLUME												
Geography: FLORIDA												
Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017												
Assessment Area (2018):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Miami CSA	73.13	497	366,727	1,654	382,255	0	0	35	191,579	2,186	940,561	86.95
North Port CSA	3.81	32	26,755	80	17,339	0	0	2	11,120	114	55,214	3.89
Limited Review:												
Cape Coral CSA	6.86	62	40,595	142	25,546	0	0	1	623	205	66,764	3.74
Orlando MSA	8.77	86	101,355	157	57,498	0	0	19	65,071	262	223,924	1.44
Tampa MSA	7.43	62	68,801	154	40,325	0	0	6	35,992	222	145,118	3.99

* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2015 to December 31, 2017.

*** Deposit Data as of December 31, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table 1. Lending Volume – New York

LENDING VOLUME												
Geography: NEW YORK												
Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017												
Assessment Area (2018):	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
New York MSA	100.00	601	708,464	205	113,126	0	0	40	184,409	846	1,005,999	100.00

* Loan Data as of December 31, 2017. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2015 to December 31, 2017.

*** Deposit Data as of December 31, 2017. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2015	565	42.1	778	57.9	1,343	565,033	43.4	736,420	56.6	1,301,453
2016	452	28.6	1,126	71.4	1,578	457,732	33.2	922,305	66.8	1,380,037
2017	323	21.0	1,218	79.0	1,541	289,932	21.8	1,042,393	78.2	1,332,325
Subtotal	1,340	30.0	3,122	70.0	4,462	1,312,697	32.7	2,701,118	67.3	4,013,815
Small Business										
2015	826	72.0	321	28.0	1,147	215,929	56.3	167,392	43.7	383,321
2016	790	85.3	136	14.7	926	196,004	76.0	61,878	24.0	257,882
2017	776	82.6	164	17.4	940	224,156	75.5	72,891	24.5	297,047
Subtotal	2,392	79.4	621	20.6	3,013	636,089	67.8	302,161	32.2	938,250
Total	3,732	49.9	3,743	50.1	7,475	1,948,786	39.4	3,003,279	60.6	4,952,065
<i>Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data Due to rounding, totals may not equal 100.0</i>										

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015-17
Florida																			
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
2015-16 Miami	392	281,761	70.4	167,316	1.9	4.3	1.1	22.1	18.1	15.6	38.7	26.0	40.5	37.3	51.5	42.7	0.0	0.0	0.1
2017 Miami	105	84,966	57.7	164,102	2.5	1.9	2.0	22.0	21.9	19.2	35.4	13.3	37.7	40.0	62.9	40.8	0.1	0.0	0.3
2015-16 North Port	22	20,205	4.0	37,095	1.0	0.0	0.3	17.3	13.6	10.8	54.6	18.2	56.0	27.1	68.2	32.9	0.0	0.0	0.0
2017 North Port	10	6,550	5.5	36,251	0.8	0.0	0.5	16.8	0.0	12.8	54.7	30.0	52.3	27.6	70.0	34.4	0.0	0.0	0.0
2015-16 Cape Coral	39	25,378	7.0	42,396	1.7	0.0	1.5	14.9	33.3	12.7	52.4	20.5	55.3	31.0	46.2	30.5	0.0	0.0	0.0
2017 Cape Coral	23	15,217	12.6	41,286	2.1	0.0	1.5	17.8	13.0	19.3	43.2	21.7	45.0	36.9	65.2	34.2	0.0	0.0	0.1
2015-16 Orlando	58	81,696	10.4	54,755	0.4	0.0	0.1	16.8	10.3	12.8	36.5	6.9	34.3	46.4	82.8	52.7	0.0	0.0	0.0
2017 Orlando	28	19,659	15.4	52,997	1.1	0.0	0.7	18.3	3.6	15.6	33.6	3.6	35.1	47.0	92.9	48.6	0.0	0.0	0.0
2015-16 Tampa	46	54,266	8.3	77,643	2.1	0.0	1.5	17.8	17.4	13.5	43.2	13.0	40.9	36.9	69.6	44.1	0.0	0.0	0.0
2017 Tampa	16	14,535	8.8	79,229	2.5	6.3	2.0	16.0	0.0	14.0	39.5	12.5	39.0	42.0	81.3	44.8	0.1	0.0	0.1
Total	739	604,233	100.0	373,865	1.9	2.7	1.6	19.5	17.3	17.0	40.4	20.2	39.8	38.2	59.8	41.4	0.0	0.0	0.2

Source: 2010 U.S Census: 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
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

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2015-17
New York																			
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
2015-16 New York	460	559,459	100.0	70,230	3.6	3.9	4.3	22.6	18.0	22.3	42.2	19.3	41.1	31.7	58.5	32.3	0.0	0.2	0.0
2017 New York	141	149,005	100.0	65,139	3.6	7.1	4.5	20.5	13.5	21.2	41.3	19.9	41.0	34.5	59.6	33.1	0.2	0.0	0.2
Total	601	708,464	100.0	65,139	3.6	4.7	4.5	21.5	17.0	21.2	41.7	19.5	41.0	33.1	58.7	33.1	0.1	0.2	0.2
<i>Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. 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</i>																			

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2015-17	
Florida																				
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	
2015-16 Miami	392	281,761	70.4	167,316	22.1	4.3	2.4	17.5	13.8	10.1	19.1	8.9	18.0	41.3	41.3	52.6	0.0	31.6	16.9	
2017 Miami	105	84,966	57.7	164,102	22.8	1.9	2.8	17.2	10.5	11.2	17.9	3.8	19.3	42.1	0.0	49.7	0.0	83.8	17.0	
2015-16 North Port	22	20,205	4.0	37,095	18.9	0.0	3.7	19.2	0.0	14.0	21.8	9.1	20.5	40.1	9.1	49.4	0.0	81.8	12.3	
2017 North Port	10	6,550	5.5	36,251	19.0	0.0	4.6	19.4	0.0	15.7	21.2	0.0	21.1	40.5	0.0	47.1	0.0	100.0	11.6	
2015-16 Cape Coral	39	25,378	7.0	42,396	19.7	2.6	2.8	18.7	2.6	12.6	20.6	5.1	18.2	40.9	12.8	51.6	0.0	76.9	14.8	
2017 Cape Coral	23	15,217	12.6	41,286	20.8	0.0	2.8	18.2	0.0	13.5	19.5	0.0	18.9	41.5	0.0	49.1	0.0	100.0	15.7	
2015-16 Orlando	58	81,696	10.4	54,755	19.3	0.0	3.2	17.5	0.0	12.0	20.0	0.0	18.8	43.2	3.4	49.9	0.0	96.6	16.2	
2017 Orlando	28	19,659	15.4	52,997	21.1	0.0	3.2	17.0	0.0	11.4	18.6	0.0	20.3	43.3	0.0	49.3	0.0	100.0	15.9	
2015-16 Tampa	46	54,266	8.3	77,643	20.1	2.2	3.3	17.8	2.2	13.3	19.5	4.3	19.0	42.6	19.6	45.9	0.0	71.7	18.4	
2017 Tampa	16	14,535	8.8	79,229	21.2	0.0	3.3	17.0	0.0	13.4	18.4	0.0	20.2	43.4	0.0	45.0	0.0	100.0	18.1	
Total	739	604,233	132.7	373,865	21.4	2.8	3.1	17.6	9.1	12.4	19.1	6.1	19.8	42.0	24.4	48.3	0.0	57.6	16.4	

Source: 2010 U.S Census: 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
 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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2015-17
New York																				
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	
2015-16 New York	460	559,459	100.0	70,230	29.2	0.2	3.1	17.6	3.7	11.8	17.8	4.6	18.5	35.4	17.0	51.5	0.0	74.6	15.1	
2017 New York	141	149,005	100.0	65,139	29.4	0.7	3.6	16.1	2.8	13.1	16.9	2.1	18.8	37.6	2.1	50.4	0.0	92.2	14.1	
Total	601	708,464	100.0	65,139	29.3	0.3	3.6	16.8	3.5	13.1	17.4	4.0	18.8	36.5	13.5	50.4	0.0	78.7	14.1	
<i>Source: 2010 U.S Census: 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. 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</i>																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-17

Florida																			
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
2015-16 Miami	1,152	257,251	78.0	258,399	3.3	6.4	3.2	21.3	30.6	20.3	32.0	26.9	29.8	42.5	34.1	45.8	0.8	1.9	0.9
2017 Miami	502	125,004	70.6	258,399	4.1	7.0	4.1	21.5	32.1	20.1	29.7	22.5	28.2	43.6	36.1	46.6	1.1	2.4	1.0
2015-16 North Port	53	10,785	3.6	26,959	1.2	0.0	1.1	18.1	30.2	16.8	48.8	39.6	46.0	31.9	30.2	36.1	0.0	0.0	0.0
2017 North Port	27	6,554	3.8	26,959	1.1	0.0	1.0	18.6	25.9	16.7	49.1	48.1	46.9	31.2	25.9	35.4	0.0	0.0	0.0
2015-16 Cape Coral	93	16,731	6.3	36,594	3.3	2.2	2.5	14.1	11.8	11.7	47.8	49.5	45.4	34.7	36.6	40.4	0.1	0.0	0.0
2017 Cape Coral	49	8,815	6.9	36,594	2.8	0.0	2.1	18.3	14.3	15.2	39.8	57.1	38.2	39.0	28.6	44.5	0.1	0.0	0.0
2015-16 Orlando	87	31,368	5.9	49,844	0.7	4.6	0.6	21.1	34.5	18.8	33.6	39.1	31.9	44.7	21.8	48.7	0.0	0.0	0.0
2017 Orlando	70	26,130	9.8	49,844	1.4	2.9	1.1	21.8	41.4	19.8	31.8	28.6	31.2	45.0	27.1	47.9	0.0	0.0	0.0
2015-16 Tampa	91	21,380	6.2	61,783	3.2	3.3	3.8	19.1	25.3	18.6	37.9	45.1	38.0	39.7	26.4	39.5	0.2	0.0	0.1
2017 Tampa	63	18,945	8.9	61,783	4.8	3.2	5.3	17.2	23.8	17.2	34.8	31.7	34.7	42.8	41.3	42.5	0.4	0.0	0.3
Total	2,187	522,963	100.0	433,579	3.2	5.6	2.8	20.3	29.8	19.0	34.2	29.5	33.5	41.8	33.5	44.2	0.6	1.6	0.5

Source: 2016 D&B Data: 01/01/2015 - 12/31/2016 Bank Data: 2016 CRA Aggregate Data, "--" data not available.
 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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2015-17
New York																				
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	
2015-16 New York	140	74,418	100.0	213,109	7.4	6.4	8.8	20.7	24.3	21.1	27.2	27.9	27.4	41.4	37.9	39.7	3.3	3.6	3.0	
2017 New York	65	38,708	100.0	213,109	7.4	10.8	9.2	18.3	15.4	18.4	24.5	30.8	23.8	46.7	38.5	46.3	3.0	4.6	2.3	
Total	205	113,126	100.0	213,109	7.4	7.8	9.2	19.5	21.5	18.4	25.9	28.8	23.8	44.1	38.0	46.3	3.2	3.9	2.3	
<i>Source: 2016 D&B Data: 01/01/2015 - 12/31/2016 Bank Data: 2016 CRA Aggregate Data, "--" data not available. 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</i>																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2015-17

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
2015-16 Miami	1,152	257,251	78.0	258,399	85.9	44.7	48.4	3.4	53.4	10.7	1.9
2017 Miami	502	125,004	70.6	258,399	91.0	40.0	48.4	3.8	56.8	5.2	3.2
2015-16 North Port	53	10,785	3.6	26,959	87.1	45.3	49.5	3.0	54.7	10.0	0.0
2017 North Port	27	6,554	3.8	26,959	90.9	33.3	49.5	3.4	63.0	5.8	3.7
2015-16 Cape Coral	93	16,731	6.3	36,594	85.9	44.1	43.5	3.2	54.8	10.9	1.1
2017 Cape Coral	49	8,815	6.9	36,594	90.4	59.2	43.5	3.6	40.8	6.1	0.0
2015-16 Orlando	87	31,368	6.2	49,844	84.9	42.5	46.7	3.6	55.2	11.5	2.3
2017 Orlando	70	26,130	9.8	49,844	89.5	22.9	46.7	3.7	74.3	6.8	2.9
2015-16 Tampa	91	21,380	6.2	61,783	85.1	50.5	47.7	3.7	48.4	11.2	1.1
2017 Tampa	63	18,945	8.9	61,783	89.1	41.3	47.7	4.1	54.0	6.8	4.8
Total	2,187	522,963	100.0	433,579	87.3	43.2	47.8	3.5	54.6	9.2	2.2

Source: 2016 D&B Data: 01/01/2015 - 12/31/2016 Bank Data: 2016 CRA Aggregate Data, "--" data not available.
 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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											
New York											
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
2015-16 New York	140	74,418	100.0	213,109	80.2	30.7	41.7	7.6	66.4	12.1	2.9
2017 New York	65	38,708	100.0	213,109	84.6	40.0	41.7	8.2	58.5	7.2	1.5
Total	205	113,126	100.0	213,109	81.7	33.6	41.7	7.8	64.0	10.5	2.4
<i>Source: 2016 D&B Data: 01/01/2015 - 12/31/2016 Bank Data: 2016 CRA Aggregate Data, "--" data not available. 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</i>											

Table 14. Qualified Investments - Florida

QUALIFIED INVESTMENTS									
			Geography: FLORIDA		Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Miami CSA	14	41,550	91	98,054	105	139,604	82.99	0	0
North Port CSA	2	1,080	22	2,381	24	3,461	2.06	0	0
Limited Review:									
Cape Coral CSA	1	799	38	6,435	39	7,234	4.30	0	0
Orlando MSA	2	750	35	4,231	37	4,981	2.96	0	0
Tampa MSA	3	1,797	53	11,133	56	12,930	7.69	0	0

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

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

Table 14. Qualified Investments – New York

QUALIFIED INVESTMENTS									
			Geography: NEW YORK		Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017				
Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
New York MSA	2	4,554	67	76,996	69	81,550	100.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: FLORIDA				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017									
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Miami CSA	86.95	64	73.56	6.25	25.00	29.69	39.06	3	13	1	- 1	- 6	- 4	5.57	28.07	33.34	32.63
North Port CSA	3.89	5	5.75	0.00	20.00	80.00	0.00	0	1	0	0	- 1	0	2.27	21.96	51.63	24.14
Limited Review:																	
Cape Coral CSA	3.74	5	5.75	0.00	20.00	20.00	60.00	1	2	0	0	0	- 1	5.52	25.90	40.82	27.76
Orlando MSA	1.44	4	4.60	0.00	25.00	50.00	25.00	0	1	0	0	- 1	0	2.76	25.62	33.32	38.30
Tampa MSA	3.99	9	10.34	0.00	11.11	22.22	66.67	0	0	0	0	0	0	5.79	20.01	38.17	35.57

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings – New York

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: NEW YORK				Evaluation Period: JANUARY 1, 2015 TO DECEMBER 31, 2017									
Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
New York MSA	100.00	6*	100.00	0.00	16.67	0.00	66.67	0	0	0	0	0	0	14.81	29.79	28.13	26.95

*One branch in the New York CSA is located in a census tract with unavailable income.