

NEWTEKBANK, NATIONAL ASSOCIATION
MIAMI, FLORIDA



CRA STRATEGIC PLAN

February 21, 2025 – December 31, 2029

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COMMUNITY REINVESTMENT ACT STRATEGIC PLAN 2025-2029

SECTION 1. INTRODUCTION

A. NewtekOne - Background

On January 6, 2023, NewtekOne, Inc. (“NewtekOne”) completed the acquisition of the National Bank of New York City (“NBNYC” and the “Acquisition” respectively), a national bank regulated and supervised by the Office of the Comptroller of the Currency (“OCC”). Pursuant to the Acquisition, NewtekOne acquired from the NBNYC shareholders all the issued and outstanding stock of NBNYC for \$20 million. NBNYC was renamed Newtek Bank, National Association (“Newtek Bank, N.A.” or “Newtek Bank” or “the Bank”) and is now a wholly owned subsidiary of NewtekOne. In connection with the completion of the Acquisition, NewtekOne contributed to Newtek Bank \$31 million of cash and two of NewtekOne’s subsidiaries, Newtek Business Lending, LLC (“NBL”) and Small Business Lending, LLC (“SBL”). Subsequently, NBL was merged into SBL.

NewtekOne, Inc. is a financial holding company that is a leading business and financial solutions provider to small-and-medium sized businesses (“SMBs”). NewtekOne and its subsidiaries provide SMBs with the following Newtek® branded business and financial solutions: Newtek Bank, Newtek Lending, Newtek Payments, Newtek Insurance, Newtek Payroll, and Newtek Technology. NewtekOne has an established and reliable platform that is not limited by client size, industry type, or location.¹ As a result, NewtekOne has a strong and diversified client base across the United States and across a variety of different industries. In addition, NewtekOne has developed a

¹ The Newtek Advantage™, which has a patent pending, provides NewtekOne’s clients with analytics, relationships and transactional capability that other financial institutions do not. Newtek Advantage™ gives our business clients a management asset that can enhance their business operations. When a client opens a Newtek Advantage™ Account they receive free unlimited document storage, free real-time updated traffic analytics, free real-time credit card processing and chargeback, batch information for merchant solutions clients, and the ability for Newtek Payroll clients to make payroll directly from business portal. Newtek Advantage™ can become a market-recognized tool and solution that NewtekOne’s clients ultimately will not want to be without.

financial and technology-based business model that enables NewtekOne to acquire and process SMB clients in a cost-effective manner. This capability is supported in large part by NewTracker®, NewtekOne’s patented prospect management technology software.

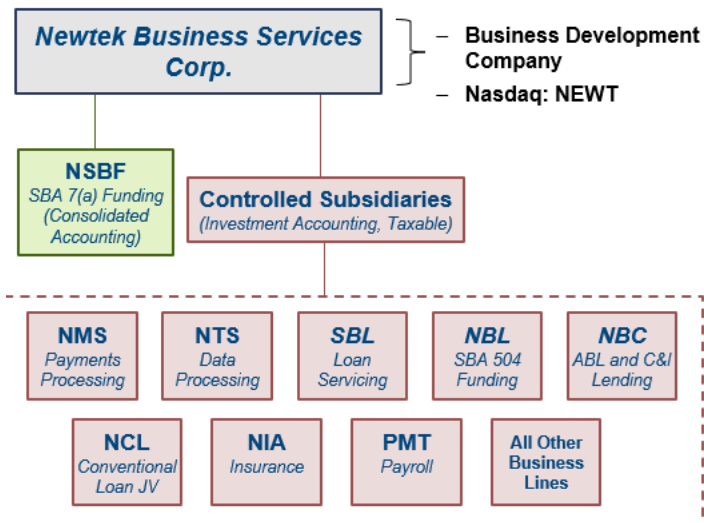
NewtekOne’s lending platform, which historically generated a material portion of NewtekOne’s revenues, includes loans originated under the federal Section 7(a) loan program, *i.e.*, U.S. Small Business Administration (“SBA”) 7(a) loans. SBA 7(a) loans are partially guaranteed by the SBA, with SBA guarantees typically ranging between 50 percent and 90 percent of the principal and interest due. Under the SBA 7(a) lending program, a lender underwrites a loan between \$5,000 and \$5.0 million for a variety of general business purposes based on the SBA loan program requirements. The recoveries and expenses on the unguaranteed portions of these loans are shared *pari passu* between the SBA and the lender, which substantially reduces the loss severity on the unguaranteed portion of a loan for SBA 7(a) loan investors. SBA 7(a) loans are typically between ten and twenty-five years in maturity, four to five years in duration and bear interest at the prime rate plus a spread from 2.25% to 3.00%. Since the guaranteed portions of SBA 7(a) loans carry the full faith and credit of the U.S. government, lenders may, and frequently do, sell the guaranteed portion of SBA 7(a) loans in the capital markets, hold the unguaranteed portion, and retain all loan servicing rights.

Historically, prior to the Acquisition, NewtekOne’s subsidiary, Newtek Small Business Finance, LLC (“NSBF”), a small business lending company (“SBLC”) licensed by the SBA to originate SBA 7(a) loans, originated, serviced, sold, and securitized loans originated under the SBA 7(a) program. NSBF funded \$560 million of SBA 7(a) loans in 2021 and \$750 million of SBA 7(a) loans in 2022. As of January 6, 2023, NSBF was the third largest SBA 7(a) lender in the U.S. by loan approval dollar volume, including banks and nonbank lenders. NSBF had received preferred lender program (“PLP”) status, a designation whereby the SBA authorizes the most experienced SBA lenders to place SBA guarantees on loans without seeking prior SBA review and approval. PLP status allowed NSBF to serve its clients in an expedited manner since it is not required to present applications to the SBA for concurrent review and approval.

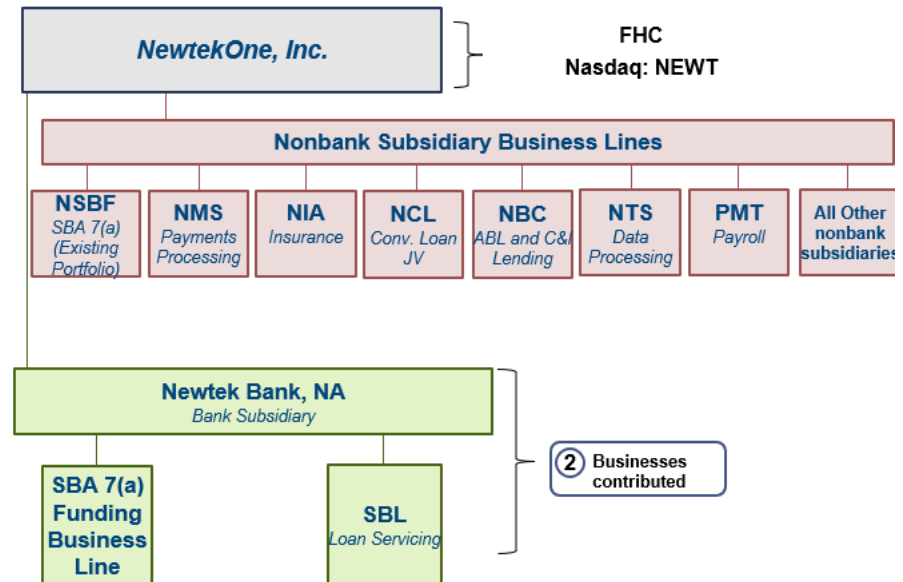
New SBA 7(a) loan originations were transitioned to Newtek Bank in April 2023, which also obtained PLP status. NewtekOne’s dedicated senior lending team is now supporting Newtek Bank, which is originating and servicing SBA 7(a) loans to qualifying SMBs following the NewtekOne SBA 7(a) loan business model. Newtek Bank originates, SBA 7(a) loans, the Bank sells the guaranteed portions of the SBA 7(a) loans, typically within thirty to forty-five days of origination, and Newtek Bank retains the unguaranteed portion of the SBA 7(a) loans.

The following organizational charts detail the organization’s former structure as a business development company, called Newtek BSC until January 2023, and its current structure as a financial holding company, called NewtekOne since 2023.

Newtek BSC Until January 2023



NewtekOne After January 2023



B. Newtek Bank, N.A.

At the time of the Acquisition, NBNYC had approximately \$200 million in assets. Following the Acquisition, Newtek Bank, NewtekOne's bank subsidiary, is now the operating entity for NewtekOne's lending and loan servicing business lines. NSBF's employees have become employees of Newtek Bank. In addition, SBL, which is now a subsidiary of Newtek Bank, originates SBA 504 loans and conventional business loans and services Newtek Bank's and NSBF's loan portfolios. SBL also generates revenue by providing third parties with loan servicing for SBA and non-SBA loans and providing lending institutions with outsourced solutions for the entire SBA lending process, including credit analysis, structuring and eligibility, packaging, closing compliance and servicing. SBL receives loan origination and servicing fees by providing loan origination and servicing solutions to NewtekOne's non-bank subsidiaries and affiliates, and SBL has provided loan servicing solutions to banks, credit unions and government agencies, including the Federal Deposit Insurance Corporation ("FDIC").

Newtek Bank is a digital bank with no branch offices. Following the acquisition of NBNYC by NewtekOne, the Bank's main office was relocated from New York to Miami Florida. In December 2023, the Bank's 'brick and mortar' branch in Flushing, New York was closed.

Newtek Bank serves a nationwide market of SMB clients with an array of banking products and financial solutions. Through its digital platform and loan production offices ("LPOs") in Florida, Texas, California, Arizona, New York and New Jersey, Newtek Bank offers SMBs a wide range of conventional and SBA financing options, and account receivable and inventory financing that can be used to acquire, start, or grow their businesses. Through the Bank's affiliation with NewtekOne, Newtek Bank customers can access personal and commercial lines insurance services, technology, payroll, and benefit services that help them compete with larger corporations.

When the SBA granted Newtek Bank PLP status in April 2023, it allowed the Bank to place SBA guarantees on loans without the need for prior SBA loan review or approval. Newtek Bank's goal is to become the premier provider of SBA 7(a) and 504 loans, conventional loans, and secured lines of credit to SMBs. Newtek Bank's business lines include, in addition to SBA 7(a) lending, SBA 504 lending, Commercial and Industrial ("C&I") lending, Commercial Real Estates ("CRE") lending, and Asset Based lending ("ABL").

Newtek Bank intends to grow its depository funding base through a digital platform by which it can leverage its national franchise of lending to SMBs throughout the U.S., including 1.5 million historical referrals in its database as well as its over 70,000 existing customers. Its digital platform will also provide a delivery channel by which it can grow individual consumer retail deposits. Wholesale funding in the form of brokered deposits and borrowings will become additional funding sources for these lending business lines as needed.

C. The Community Reinvestment Act

The United States Congress passed the Community Reinvestment Act (“CRA”) in 1977. The existing interagency CRA regulations, promulgated cooperatively by the OCC, the Federal Reserve Board, and the Federal Deposit Insurance Corporation (“FDIC”), substantially date to 1995. Regulatory revisions to the CRA were adopted following notice and comment in 2023. However, the existing CRA regulations will remain in effect until January 1, 2026, when most of the 2023 final CRA rule’s new requirements become applicable.

The CRA statute requires the federal bank regulatory agencies to encourage insured depository institutions to help meet the credit needs of the entire set of communities in which they do business. CRA regulations establish that the communities that bank examiners review comprise the areas around a bank’s branches and deposit-taking automated teller machines (“ATMs”). Those areas are referred to as assessment areas (“AAs”).² An AA typically consists of a metropolitan statistical area (“MSA”), one or more metropolitan divisions (“MDs”), or one or more contiguous political subdivisions, such as counties, cities, or towns. Newtek Bank has delineated its AA as the Miami-Fort Lauderdale-West Palm Beach FL MSA (“Miami AA”) which constitutes the most expansive assessment area delineation around its main office permitted under existing CRA regulations.

The CRA was enacted to combat redlining, which is a refusal or reluctance to lend in a particular neighborhood or area because of the predominant race or ethnicity of its residents. In conducting CRA examinations and accompanying fair lending examinations, examiners evaluate whether the bank is actively engaged in lending activity throughout its AA(s), whether the delineated AA(s) comply with regulatory standards, whether those assessment areas improperly exclude geographies based on income or a prohibited basis, whether loans are widely and fairly distributed throughout the bank’s AA(s), and whether maps of lending patterns depict conspicuous lending gaps or redlining.

Regulators grade a bank’s CRA record of serving its AA(s) as “Outstanding”, “Satisfactory”, “Needs to Improve”, or “Substantial Noncompliance”. In assigning an examination rating, particular attention is normally paid to the bank’s volume of lending, the percentage of the bank’s overall lending that occurs in its assessment area(s), the geographic distribution of lending in the assessment

²See, for example, Federal Reserve Bank of Dallas, **A Banker’s Quick Reference Guide to CRA**, September 1, 2005, which defines assessment area “as one or more of the geographic areas delineated by a bank and used by the regulatory agency in evaluating the bank’s record of helping to meet the credit needs of its community. An AA must, in general, consist of one or more MSAs or metropolitan divisions or one or more contiguous political subdivisions, such as counties, cities or towns. It must include geographies in which the bank has its main office, branches, and deposit-taking ATMs, as well as the surrounding geographies in which the bank has originated or purchased a substantial portion of its loans. A bank may adjust the boundaries of its AA to include only the portion of a political subdivision that it reasonably can be expected to serve. An AA must consist only of whole geographies, may not reflect illegal discrimination, may not arbitrarily exclude [low- and moderate-income] geographies and may not extend substantially beyond an MSA boundary or beyond a state boundary, unless the AA is in a multistate MSA.”

area(s) by tract income, the borrower distribution of lending in the assessment area by borrower income or business size, any conspicuous gaps in lending or in the delineation of the assessment area(s), and lending to communities that may have historically been underserved by financial services providers, such as small businesses and low- and moderate-income (“LMI”) individuals, households, and neighborhoods. For all but the smallest banks, examiners also evaluate lending, investment, or services that have a community development (“CD”) purpose, such as for affordable housing, economic development and job creation, the provision of health and educational services targeted to LMI persons, or community revitalization or development in poor or distressed areas.

The regulators take a bank’s CRA record into account when deciding whether to approve certain corporate applications, including applications for mergers or acquisitions. Ratings of “Needs to Improve” or “Substantial Noncompliance” normally will have a negative effect on those decisions.

D. CRA Strategic Plan

The CRA examination standards applicable to a bank the size of Newtek Bank may not adequately measure the Bank’s CRA performance because the CRA performance measures for a Small Bank or an Intermediate Small Bank (“ISB”) place a premium on a bank making most of its loans inside its delineated AA(s). Because Newtek Bank will operate digitally without branch offices, its AA is limited by regulation to the area around its main office in Miami, Florida. While the Bank has defined its Miami AA expansively to include the entire Miami-Fort Lauderdale-West Palm Beach MSA and will actively lend in that area, most of its loans will be outside the Miami AA. Far fewer than 50 percent of its loans will be made inside its AA. Even though examiners account for “performance context” in their CRA evaluations, an examination of the amount of lending in the Miami AA will not fully and meaningfully capture the extent of the Bank’s lending in the Miami AA, particularly its lending in LMI geographies or to small businesses with gross annual revenues (“GAR”) of \$1 million or less.

Although the percentage of lending inside a bank’s AAs may be an appropriate criterion for a traditional bank with branch offices, the percentage of a bank’s loans made inside its AA is not an indicative measure of CRA performance for a digital bank operating without physical branches. For circumstances in which a CRA evaluation using regulatory metrics, like the percentage of loans made inside the delineated assessment area, would not appropriately measure the bank’s CRA performance, the CRA regulations include a provision for a bank to elect to be assessed under an alternative standard, referred to in the regulations as a CRA Strategic Plan (“CRA Plan” or “Plan”).³ A CRA Plan offers a bank an opportunity to establish measurable CRA performance goals, subject to public comment and

³ The regulations for a strategic plan state: “Any Institution is permitted to develop, and submit for approval by its primary supervisory agency, a strategic plan (the “Plan”) for addressing its responsibilities with respect to CRA. The Plan option was developed to provide institutions with more flexibility and certainty regarding what aspects of their performance will be evaluated and what quantitative and qualitative measures will be applied. To exercise this option, an institution must

regulatory approval. The goals in a CRA Plan should be appropriate for the characteristics and credit needs of the bank's assessment area and reflect the bank's own capabilities, business strategy, and organizational framework. The CRA Plan option affords an opportunity for a bank, subject to regulatory standards, to customize its performance goals considering its core business strategy. The CRA Plan option also offers the public or other stakeholders an opportunity to provide input, prior to the final regulatory Plan's approval, about the appropriateness of the proposed CRA Plan for helping to meet credit and community development needs of a bank's delineated AA.

Newtek Bank proposes to operate pursuant to a CRA Strategic Plan that will establish measurable performance goals for its Miami assessment area. Consistent with regulatory requirements, the Newtek Bank CRA Strategic Plan includes:

- Measurable annual goals established separately for satisfactory and outstanding performance.
- Goals specified for each of the five years 2025 through 2029 and for the full five-year period of February 21, 2025 – December 31, 2029.
- Approval subject to public input and regulatory consideration.

Newtek proposes to adopt metrics that comply with established CRA guidance issued by the federal financial institution regulatory agencies, that reflect the Bank's commitment to becoming a preferred SBA 7(a) lender for SMBs, and, where appropriate, are comparable to those in other approved CRA Strategic Plans, including those approved for other digital banks that are operating without branches and serving a nationwide market.⁴ Newtek proposes that its measurable performance goals be established for its SBA 7(a) lending in its AA; CD loans and qualified CD investments (including grants and donations) in its Miami AA and the broader statewide or regional area ("BSRA"), which Newtek has designated as the state of Florida; and CD services in its Miami AA and in the Florida BSRA. If approved, those measures, which are laid out in detail in Section 3 of this Plan, will constitute the principal performance standards for evaluating Newtek Bank's CRA performance during the five-years from February 21, 2025, through December 31, 2029.

informally seek suggestions from the public while developing its Plan, solicit formal public comment on its Plan and submit the Plan to its regulatory agency (along with any written comments received from the public and an explanation of any changes made to the Plan in response to those public comments). A bank shall address in its plan all three performance categories and, unless the bank has been designated as a wholesale or limited purpose bank, shall emphasize lending and lending-related activities. Nevertheless, a different emphasis, including a focus on one or more performance categories, may be appropriate if responsive to the characteristics and credit needs of its assessment area(s), considering public comment and the bank's capacity and constraints, product offerings, and business strategy." 12 CFR § 25.27(f).

⁴ CRA Plans and/or CRA Plan performance goals reviewed in preparation of this Plan include those of Varo Bank, Live Oak Bank, BMW Bank, Morgan Stanley Private Bank, Morgan Stanley Bank N.A., Bancorp Bank, Charles Schwab Bank, Sofi Bank, Celtic Bank, Continental Bank, and Titan Bank.

With respect to community development activities, many of the financial institutions with which the Bank competes in the Miami AA have long track records of support for affordable housing and economic development in the Miami AA and the broader statewide or regional area that includes the Miami AA. Newtek Bank is a new entrant to that market, as of January 2023. In establishing and meeting CD investment, lending, and service goals, the Bank will be operating in a mature community development marketplace, but one that evidences a continuing need for affordable housing, community services targeted to LMI persons, jobs and economic development, and neighborhood stabilization and revitalization.

Newtek Bank will make CD loans in its AA that may include, but not be limited to, business loans for amounts above \$1 million that serve a primary CD purpose, such as by supporting additional permanent job creation for LMI persons or in LMI areas, offering services targeted to LMI persons, or revitalizing or stabilizing a distressed area. The Bank may also make loans to organizations that promote economic development and job creation or that develop housing that is affordable for LMI persons and households, including loans for the development of multi-family housing that is affordable for and/or targeted to LMI families and persons. Qualified CD investments may include investments in low-income housing tax credits (“LIHTCs”), investments in New Markets tax credits, investments in mortgage-backed securities (“MBS”) targeted to support housing affordable to LMI families, investments in small business investment corporations (“SBICs”), and deposits in community development financial institutions (“CDFIs”, low-income credit unions, and minority-owned and women-owned financial institutions (“MWFIs”). CD services may include participating on the boards or finance committees of non-profit CD organizations; providing financial literacy services targeted principally to LMI persons; and offering financial workshops, guidance, and support to enhance the ability of small businesses to survive and thrive. Grants and donations will further support the work of such organizations.

SECTION 2. PERFORMANCE CONTEXT

A. Newtek Bank’s Business Model

Newtek Bank helps its business customers maximize the impact of their funding by assisting them to find areas to grow, cut costs, and minimize risks. At each stage of the lending process, the Bank’s goal is to make business financing easier and more impactful for its customers. The Bank achieves this goal by offering products that can address both short- and long-term funding needs by combining multiple financing products into a single solution. Its digital platform is available 24/7, and customer support is available every day during business hours.

Throughout its 25-year history, NewtekOne has exhibited exceptional performance in meeting SMB credit needs through its expansive offering of conventional commercial loans and SBA loans, principally SBA 7(a) loans, to SMBs in all 50 states. NewtekOne’s legacy

portfolio includes more than \$2 billion in loans made to SMBs by its affiliates, which includes loans to approximately 2,600 borrowers, 30 percent of which were women-owned or minority-owned businesses (“WMBs”). More than 20 percent of those loans, approximately 570 loans, were in amounts of \$150,000 or less. More than 50 percent of the loans Newtek and its affiliates originated since 2019 were to businesses with GAR of \$1 million or less. NewtekOne has a demonstrated record of responsiveness to SMBs, which will be enhanced through the acquisition of Newtek Bank. Newtek Bank, like its parent company, will be especially responsive to the financing needs of smaller businesses, businesses in small cities and rural areas, businesses operating in and serving LMI communities, and to WMBs.

Newtek Bank is building on and enhancing the NewtekOne legacy through plans to expand credit availability to underserved SMBs, including those owned by women and minorities and those located in rural markets and small cities in all 50 states. The Bank offers conventional and SBA-backed small-dollar loans. Some of those loans may also support a CD purpose, including development of affordable housing, job creation for LMI persons, provision of educational or health services to LMI persons, or area stabilization and revitalization.

Newtek Bank has extensive experience in making loans to businesses in manufacturing, wholesaling, services, retailing, general and heavy construction, special trade construction, and more.

Newtek Bank offers funding that can help SMBs to:

- Expand or acquire a business.
- Increase cash flow.
- Invest in marketing or e-commerce.
- Purchase owner-occupied real estate.
- Fund leasehold improvements.
- Increase working capital.
- Open a new location.
- Purchase inventory or equipment.
- Renovate owner-occupied real estate.
- Refinance existing business debt.

Newtek Bank’s ability to leverage its status as a preferred lending partner with the SBA and to utilize the employees and digital platform (developed over the past 25 years by its parent company) gives the Bank a competitive advantage relative to all other banks and non-banks in serving SMB market participants. The Bank’s ability to acquire over 100,000 business referrals a quarter and 1.5 million total referrals in NewtekOne’s proprietary database enables it not only to identify opportunities with clients in all 50 states but also to process

the business efficiently and cost-effectively, without the travel and entertainment normally associated with a lender visiting a client. Newtek Bank is also able to digitally market through emails, videos, podcasts and webinars to its own client base and client bases of current and future strategic partners.

Newtek Bank will continue to use its digital platform and referral database to reach SMB customers that may have limited financing options among traditional banks. Newtek Bank funds business loans ranging in size from \$1,000 to \$15 million. Payback terms run from 5-25 years, and its loans typically carry limited or no repayment penalties. Newtek Bank expects that most of the small business loans (in terms of number of loans) it will originate will be to businesses with annual revenues under \$1 million, businesses in LMI geographies, and/or women- and minority-owned businesses. Unlike a traditional bank, Newtek Bank's digital platform will allow it to serve SMBs anywhere in the country, which means most of its loans will be made outside of the delineated CRA assessment area immediately surrounding its main office in Miami, Florida. In its AA, Newtek will be a small business lending leader and will finance SMBs throughout the entire AA, including in LMI geographies and SMBs with gross annual revenues of \$1 million or less.

Newtek Bank's underwriting aligns with OCC guidance regarding small business lending.⁵

*The OCC encourages and supports banks' lending to small businesses, which plays a vital part in the economy and the communities they serve. SBA loan programs help banks serve creditworthy small businesses that are otherwise unable to obtain credit at reasonable terms. These small businesses generally have adequate repayment capacity based on reasonable cash flow projections but may have weak collateral or a lack of established credit or cash flow history. The SBA also provides programs that offer technical assistance to help these small businesses survive and prosper."*⁶

Newtek Bank's underwriting applies the principles laid out in the OCC guidance to ensure that the Bank's small business lending is carried out responsibly and consistent with the bank's overall business plans, strategies, and risk appetite. Newtek Bank prioritizes lending to SMBs that have a track record of positive earnings. The Bank practices sound risk management while also aggressively seeking customers with GAR of under \$1 million, businesses in and serving LMI communities, newer businesses, and women-owned and minority-owned businesses. In support of community development, Newtek Bank will also prioritize lending to businesses that are expanding operations and creating new jobs, including in its Miami AA and the broader statewide area that includes the Miami AA.

⁵ OCC Bulletin 2021-34, August 5, 2021, addresses small business lending, SBA lending, and risk management.

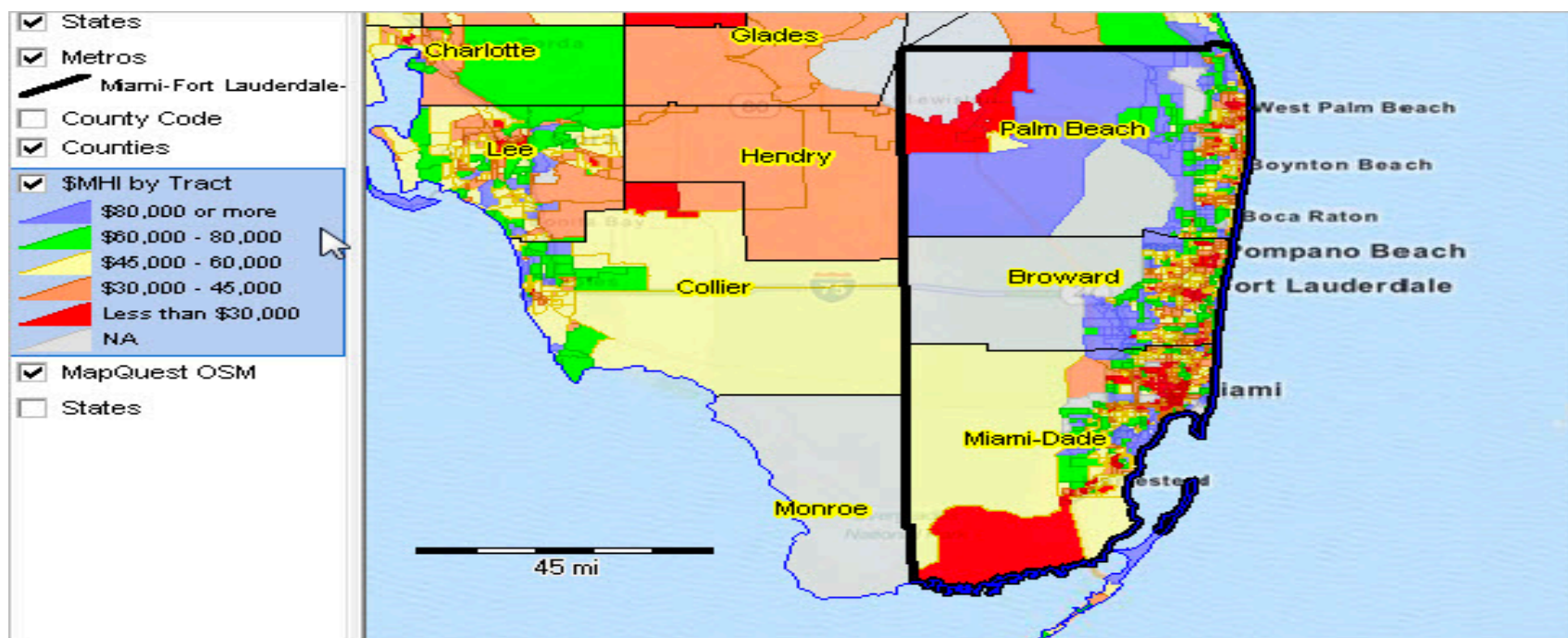
⁶ Ibid., p. 1.

B. The Miami FL Assessment Area

Newtek Bank's assessment area, the Miami AA, consists of three Metropolitan Divisions:

- MD 33124 (Miami-Miami Beach-Kendall, FL), which consists of Miami-Dade County;
- MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL), which consists of Broward County; and
- MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL), which consists of Palm Beach County.

A map of Newtek Bank's Miami FL AA showing the median household income ("MHI") by census tract income throughout the Miami AA is shown below.



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According to U.S. Census data, the Miami AA consists of 1,497 census tracts (“CTs”), of which 79 (5.3 percent) are low-income, 394 (26.3 percent) are moderate-income, 457 (30.5 percent) are middle-income, 512 (34.2 percent) are upper-income, and 55 (3.7 percent) have no assigned income classification. In the Miami AA, 8.9 percent of families live below the poverty level. Demographic and economic data for the Miami AA are presented in the following table. Detailed demographic information can be found in the FFIEC 2024 Census Reports for the three Metropolitan Divisions comprising the Miami AA in Appendix B of this Plan.

Key Demographic Information by Income Categories for the Miami AA						
Demographic Characteristic	Number	Low (%)	Moderate (%)	Middle (%)	Upper (%)	NA*
Geographies (Census Tracts)	1,497	5.3	26.3	30.5	34.2	3.7
Population by Geography	6,138,333	4.7	28.0	31.4	34.4	1.5
Housing Units by Geography	2,548,767	4.8	27.4	30.9	35.5	1.5
Businesses by Geography	2,257,013	2.9	22.4	29.1	42.9	2.7
Families by Income	1,418,815	22.5	17.6	18.0	41.9	0.0
Households by Income	2,172,740	24.7	16.0	16.8	42.5	0.0

Source: 2020 ACS, 2023 D&B data, and FFIEC Estimated Median Family Income

** The NA Category consists of geographies that have not been assigned an income classification*

C. The Population of the Miami FL Assessment Area⁷

In 2020, the Miami AA had a population of 6.14 million people. Despite the global pandemic in 2020, the Miami MSA's economy has been strong, fueled by population growth and increasing incomes. For example, between 2019 and 2020 the population of the Miami AA grew from 6.09 million to 6.14 million, an annual growth rate of 0.64 percent. During the same period, median family income reached \$73,400 in Broward County, \$79,800 in Palm Beach County, and \$60,700 in Miami-Dade County.⁸ The three largest ethnic groups in the Miami AA are White (Hispanic) (33.7 percent), White (Non-Hispanic) (30.3 percent), Black or African American (Non-Hispanic) (20 percent), which collectively account for 84 percent of the population in the Miami AA. 40.9 percent of the population were foreign born, the greatest number being from Cuba.

D. Housing Affordability in the Miami AA

In 2023, the median property value for single-family homes in the Miami AA reached \$600,000. Housing prices in the Miami AA are rising rapidly – up 9.1 percent in the past year and 41.2 percent over the past three years.⁹ Rental prices have also risen significantly in recent years and continue to increase. The COVID-19 pandemic and its aftermath have further contributed to soaring prices.

As a result of rapidly rising housing prices, housing affordability has become an increasingly significant problem in the Miami AA. Not only have housing prices increased rapidly in the Miami AA, but the rate of growth in both estimated mortgage payments and median home prices have outpaced income growth over the past three years. Monthly mortgage payments for the median-priced home account for 45.0 percent of median income in the Miami AA compared to 25.5 percent for the U.S. overall. The median housing price in the Miami AA represents 6.8 percent of median income, compared to 4.1 percent for the U.S. overall. In summary, housing is less affordable in the Miami AA than in the U.S. overall and the disparity is growing. A lack of affordable housing inventory and high housing costs are increasing challenges for LMI families.

The following table summarizes those key indicators of housing prices and housing affordability in the Miami AA.

⁷ See [Miami-Fort Lauderdale-West Palm Beach, FL | Data USA](#).

⁸ Source: 2020 ACS and FFIEC Estimated Median Family Income

⁹ Source: National Association of Realtors, Miami-Fort Lauderdale-West Palm Beach Local Market Report, 4th Quarter, 2023.

Housing Price Data¹⁰	Miami AA	United States	Trends
Median Housing Price 4Q 2023	\$600,000	\$387,300	<i>Median Housing Price in Miami exceeds the U.S. median by more than 50 percent.</i> <i>Housing Prices in are growing faster in Miami AA than in the U.S.</i>
Appreciation in Last 4 Quarters	9.1 %	3.1%	
Appreciation in Last 12 Quarters	41.2%	24.5%	
Monthly Mortgage to Income 4Q 2023	45.0%	25.5%	<i>Housing is less affordable relative to income in Miami AA than in the U.S.</i> <i>Housing affordability is worsening in Miami at a faster pace than in the U.S.</i>
Monthly Mortgage to Income Historical Average	23.9%	17.0%	
Median Housing Price to Income 4Q 2023	6.8%	4.1%	
Median Housing Price to Income Historical Average	5.1%	3.4%	

¹⁰ Source: National Association of Realtors, Miami-Fort Lauderdale-West Palm Beach Local Market Report, 4th Quarter, 2023.

A lack of housing supply is impacting property sales, particularly for single-family homes. Additionally, many lower priced properties are quickly purchased in cash by investors, further limiting the number of affordable homes available to LMI buyers. In 2020, approximately 22 percent of all homes sales in the AA were cash purchases.

Home building is strong, but because of supply chain issues, increased costs of labor, and rising interest rates the Miami AA is facing severe housing pressure. According to one local builder speaking during the Pandemic, “Unfortunately, the cost of building a home has gone up \$40,000 to \$50,000 in the last year...We were not able to get windows on houses all year. We can’t get appliances in many communities...We are seeing more cash buyers.”¹¹ Competing with cash buyers can make affordable houses less attainable for LMI households.

E. The Economy and Jobs in the Miami AA

The economy in the Miami AA is strong, and it has recently outperformed the U.S. economy. At the end of 2023, 3.2 million people were employed in the Miami AA.¹² The unemployment rate in the area was just 2.4 percent.¹³

According to Dunn and Bradstreet, there were 2,257,013 businesses in the Miami AA for 2023. More than 90 percent are considered small business. Small businesses are defined for the Dunn and Bradstreet analysis as businesses having revenues of \$1 million or less. The largest industries, in terms of the number of jobs, in the Miami AA are Trade, Transportation and Utilities (678,000), Professional and Business Services (525,000), Education and Health Services (460,000), and Leisure and Hospitality (344,000).¹⁴ In 2022, an executive with a business trade association in the Miami area stated, “Our economy has been strong, and we don’t see that changing in ’23...Aviation, technology, financial services, advanced manufacturing, and marine industries have seen job growth in the last year and certainly in the last two years. Tourism has really been strong. That has been helped by the ability of foreign travelers to come back in.”¹⁵ A bank executive echoed that perspective, observing that his clients tell him, “Business is good. I can’t get enough help, and I’m just now starting to get enough supply.”¹⁶

¹¹Mike Belmont, President, Minto Communities USA, Coconut Creek.

¹² Source: Bureau of Labor Statistics (“BLS”).

¹³ Ibid.

¹⁴ Ibid.

¹⁵ Ron Drew, Executive Vice President, Greater Fort Lauderdale Alliance.

¹⁶ Bill Penny, President/CEO, Marine Bank & Trust, Vero Beach; Chair, Florida Bankers Association.

The tech sector has added jobs, hotels are occupied, and restaurants are rebounding, but some post-Pandemic disruptions exist. Following the pandemic, demand for premium office space has weakened despite the net inflow of workers. Second, the population growth is putting pressure on school facilities and teacher hiring. Third, inflation and higher interest rates have squeezed household budgets.

F. Consumer Spending in the Miami AA¹⁷

According to the United States Bureau of Labor Statistics (“BLS”), households in Miami spent an average of \$64,943 per year in 2021–22. The BLS stated that this number was below the average level of household expenditures in the U.S., but not statistically significantly below U.S. norms.¹⁸

Miami-area households allocated their dollars similarly to the nation in 6 of the 8 largest major components of consumer spending tracked by the BLS. The differences were in expenditures of housing and healthcare. Housing was the largest expenditure component for Miami-area households and averaged \$24,248.¹⁹ Housing accounted for 37.3 percent of the area’s household budget, significantly higher than the 33.5 percent U.S. average. That was the third highest among 22 MSAs in the United States, behind only San Francisco and New York.²⁰

The relatively high cost of housing and the relatively high percentage of the AA’s household budgets allocated to housing make it difficult for LMI borrowers to purchase a home. Another factor impacting the ability of LMI borrowers to qualify for and purchase homes in the AA is the relatively high cost of insurance and property taxes that lower borrower purchasing power, especially in coastal areas and areas prone to flooding. Based on the most recent tax data available, the median property taxes for Miami-Dade, Broward, and Palm Beach counties were \$2,756, \$2,664, and \$2,679, respectively, ranking among the highest in the state.

Miami-area spending on transportation and food was in line with national averages. Miami area households spent 16.8 percent of their budget on transportation and 12.1 percent on food. Healthcare spending, however, was slightly below national averages.²¹

¹⁷Source is [Consumer Expenditures in the Miami Metropolitan Area — 2021–22 : Southeast Information Office : U.S. Bureau of Labor Statistics \(bls.gov\)](#) , September 2023.

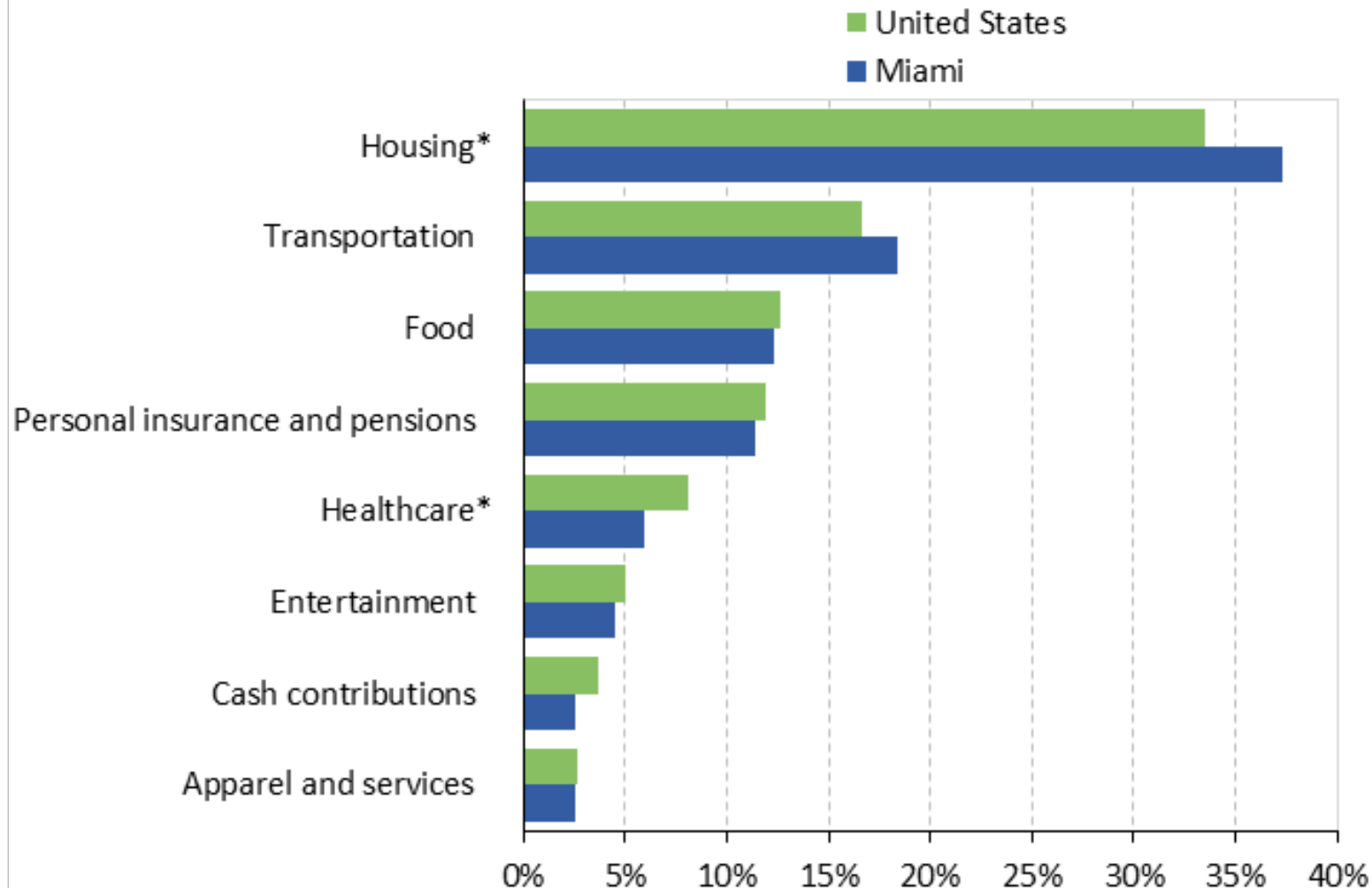
¹⁸ Ibid.

¹⁹ Ibid.

²⁰ Ibid.

²¹ Source is [Consumer Expenditures in the Miami Metropolitan Area — 2021-22: Southeast Information Office : U.S. Bureau of Labor Statistics \(bls.gov\).](#)

Chart 1. Shares of average expenditures for selected major components in the United States and Miami metropolitan area, 2021–22



Note: An asterisk indicates a statistically significant difference at the 95-percent confidence level.

Source: U.S. Bureau of Labor Statistics.

G. Banking Competition and Community Development Opportunities in the Miami AA

Banking competition is very strong in Florida, particularly in the Miami AA. Based on the FDIC's Deposit Market Share Report as of June 30, 2023, there were 85 insured depository institutions in the AA operating out of 1,350 branches and offices. The top five banks in terms of deposits in the MSA are Bank of America, Wells Fargo, JP Morgan Chase, Citibank, and Truist Bank. Together they accounted for \$189 billion in deposits in the Miami AA – or 58 percent of total market deposits of \$334 billion. Newtek Bank was a new entrant to that market in 2023. The Bank has one office and registered a zero percent deposit market share, ranking last in the AA.²²

The AA is also very competitive for CD lending, investments, and services, but opportunities for Newtek Bank to make a difference in the market exist. Investment opportunities are highly competitive, especially with banks purchasing targeted investments to support affordable housing for LMI individuals/geographies and small business lending. Many community banks and larger banks purchase securities backed by home mortgages to LMI people, or mortgages in LMI geographies, affordable housing multifamily properties, or SBA loan pools in their AAs. Some make deposits in minority-owned financial institutions and low-income credit unions. Opportunities to make donations/grants to qualifying organizations that have missions that support the CRA CD purpose are available. CD lending opportunities are available in the AA including opportunities to partner with nonprofit organizations that have a CD mission or purpose. Commercial loans may qualify as CD loans if they support permanent job creation for LMI persons, finance projects offering community development services, or contribute to the revitalization of LMI areas or designated disaster areas. There are also numerous nonprofit organizations located in the AA with which the Bank can partner that provide various services targeted to LMI people or small businesses, such as affordable housing opportunities, financial literacy training, support for economic development activities, and more.

H. Broader Statewide or Regional Area that Includes the Miami AA

A financial institution's CRA performance is evaluated primarily on how it helps to meet the credit and community development needs of its AA. The CRA regulations and interagency guidance²³ add that a bank may be able to meet community development needs of its AA(s) through activities that benefit a BSRA, even when the benefit to the AA(s) may be indirect. Guidance also states that if an institution has been responsive to the needs of its AA(s), then it will receive consideration for a community development activity in the broader statewide or regional area that regardless of whether the activity benefits the assessment area.²⁴ In addition, under the

²² The Deposit Market Share is the percentage of deposits an FDIC-insured institution has within a defined geographic market. This data is based on the annual Summary of Deposits (SOD) survey for FDIC-insured institutions as of June 30. [FDIC: Summary Of Deposits Market Share Selection](#).

²³ See for example [Interagency Questions and Answers Regarding Community Reinvestment](#), 81 FR 48506 (July 25, 2016), which is available at <https://www.gpo.gov/fdsys/pkg/FR-2016-07-25/pdf/2016-16693.pdf>.

²⁴ [Interagency Questions and Answers Regarding Community Reinvestment](#) at § __.12(h)-6, 81 FR 48529 (July 25, 2016).

interagency rules and interpretations, a financial institution will receive consideration for activities that help to revitalize or stabilize a designated disaster area that includes one or more of the bank's delineated assessment areas. "CRA consideration for activities that assist the disaster areas or affected individuals will be given regardless of the median income of the census tract or the personal income of the individual. However, the agencies may give greater weight to activities that are most responsive to community needs, including the needs of LMI areas and individuals."²⁵

As noted earlier in this Plan, Newtek Bank has delineated the Miami-Fort Lauderdale-West Palm Beach MSA as its assessment area. Newtek proposes that within this Plan that the broader statewide or regional area ("BSRA") be the state of Florida. Detailed Census Bureau information about the counties comprising Miami-Fort Lauderdale-West Palm Beach MSA and the state of Florida can be found through the following link: [FLORIDA: 2020 Census](https://www.census.gov/library/stories/state-by-state/florida-population-change-between-census-decade.html).²⁶

SECTION 3. NEWTEK BANK'S CRA STRATEGIC PLAN

A. Community Reinvestment Act Requirements for Small Banks

The regulatory CRA examination and rating criteria differentiate between small and large banks. The small bank framework offers a more streamlined examination than the large bank framework.

"Small bank" means an institution that, as of December 31 of either of the prior two calendar years, had assets of less than \$1.564 billion; an "intermediate small bank" ("ISB") is a "small bank" with assets of at least \$391 million as of December 31 of each of the prior two calendar years and less than \$1.564 billion as of December 31 of either of the prior two calendar years. Banks with assets of at least \$1.564 billion in each of the preceding two years would be a "large bank".

Newtek Bank is currently subject to small bank examination procedures. NBNYC was a small bank with total assets below \$391 million on December 31, 2022. Therefore, after the acquisition, Newtek Bank has been deemed a small bank. It is subject to the small bank CRA examination standards, through at least December 31, 2024.

²⁵ Interagency Questions and Answers Regarding Community Reinvestment at § __.12(g)(4)(ii) 2, 81 FR 48427 (July 25, 2016).

²⁶ The web address is: <https://www.census.gov/library/stories/state-by-state/florida-population-change-between-census-decade.html>

As of December 31, 2023, Newtek Bank had total assets of \$661 million. Assuming it continues to maintain total assets above \$391 million and below \$1.564 billion through December 31, 2024, Newtek Bank will be considered an intermediate small bank beginning January 1, 2025, and for at least two years thereafter.

The small bank CRA examination evaluates a bank's CRA record based on its overall lending activity as measured by its loan-to-deposit ratio, whether its loans are mostly made in its assessment area(s), and the distribution of mortgage loans in its assessment area among borrowers and geographies by household income, business size, and the income of the census tracts in which the household or business is located. The CRA small bank test entails the following five elements.

1. The institution's loan-to-deposit ratio and, as appropriate, consideration of other lending-related activities such as secondary market participation, community development loans, or qualified investments.
2. The percentage of loans and other lending-related activities located in the institution's AA(s).
3. The distribution of lending in the AA(s) among borrowers of different income levels and businesses/farms of different sizes.
4. The distribution of lending in the AA(s) among geographies of different income levels.
5. The institution's record of action, if warranted, in response to written complaints about its CRA performance.

Whereas Newtek Bank operates as a national lender relying on a digital platform and no physical branches, the CRA small bank evaluation prioritizes a bank's lending in its local, delineated AA surrounding its main office and branches. While Newtek will obtain its deposits nationally and lend in all 50 states, the CRA small bank examination would look principally at its lending in its Miami AA. Newtek Bank understands and appreciates that examiners consider performance context, such as branching network and business strategies, in their CRA evaluations. However, Newtek believes that a CRA small bank evaluation or ISB evaluation, which include review of the "Percentage of Bank Lending Inside the Assessment Area," would offer an incomplete picture of the Bank's overall CRA record. Newtek Bank's lending in and around the Miami AA constitutes substantially less than 50 percent of the Bank's lending, and since lending in the assessment area represents only a nominal share of the Bank's overall lending, any assessment of the extent of lending inside its AA compared to outside its AA would offer an incomplete and misleading picture of the Bank's commitment to provide loans and other financial services to SMBs.

Therefore, the Bank proposes to be evaluated under a CRA Strategic Plan. Compliance with the CRA through a Strategic Plan would allow Newtek Bank to design a program, subject to notice, comment, and regulatory approval, with measurable performance goals that

comply with the CRA regulations and appropriately reflect the Bank's structure, capabilities, business strategies, and organizational framework.²⁷

B. Principal Elements of Newtek Bank's CRA Strategic Plan

This CRA Strategic Plan and its goals reflect Newtek Bank's business strategies, a review of credit needs/opportunities in the Bank's Miami AA, and a review of CRA strategic plans that have been approved for other national banks and digital banks that operate nationally without, or largely without, branch offices. The Plan also incorporates informal feedback from the OCC in response to preliminary discussions with the regulator about the CRA Strategic Plan option.

As required by regulation and guidance, the Plan's goals are established for the Bank's assessment area, the Miami-Fort Lauderdale-West Palm Beach MSA, which is described in Section 2.B and elsewhere in this Plan as the Miami AA. Because the Bank operates nationally, with a minority of its lending occurring in the Miami AA, the Bank's Plan does not include a specific measure of the percentage of its lending inside compared to outside its assessment area. However, it includes a goal related to its market rank in making business loans to SMBs (measured by its principal business loan product, SBA 7(a) loans) in its AA and a goal with respect to the geographic distribution of its SBA 7(a) loans in its AA. The Plan also includes considerations of community development activities in the AA and throughout the state of Florida.²⁸ Consideration of CD loans and qualified investments in Florida, but outside the AA is permitted under the CRA regulations so long as examiners determine that the Bank has been adequately responsive to the community

²⁷ The regulations for a strategic plan (§ _____.27—Strategic Plan) state:

"Any Institution is permitted to develop, and submit for approval by its primary supervisory agency, a strategic plan (the "Plan") for addressing its responsibilities with respect to CRA. The Plan option was developed to provide institutions with more flexibility and certainty regarding what aspects of their performance will be evaluated and what quantitative and qualitative measures will be applied. To exercise this option, an institution must informally seek suggestions from the public while developing its Plan, solicit formal public comment on its Plan and submit the Plan to its regulatory agency (along with any written comments received from the public and an explanation of any changes made to the Plan in response to those public comments)."

²⁸ Interagency Questions and Answers Regarding Community Reinvestment at § __.12(h)-6, 81 FR 142, 48529. "An institution's activity is considered a community development loan or service or a qualified investment if it supports an organization or activity that covers an area that is larger than, but includes, the institution's assessment area(s). The institution's assessment area(s) need not receive an immediate or direct benefit from the institution's participation in the organization or activity, provided that the purpose, mandate, or function of the organization or activity includes serving geographies or individuals located within the institution's assessment area(s).... In addition, a retail institution will receive consideration for certain other community development activities. These activities must benefit geographies or individuals located somewhere within a broader statewide or regional area that includes the institution's assessment area(s). Examiners will consider these activities even if they will not benefit the institution's assessment area(s), as long as the institution has been responsive to community development needs and opportunities in its assessment area(s)."

development needs and opportunities of its AA, as set forth in the Interagency Questions and Answers Regarding Community Reinvestment.²⁹ Demographic, economic, housing, and competitive conditions of the Miami AA, all of which were considered in the development of this Plan, are described in more detail in Section 2.C through Section 2.G of this Plan.

With these considerations in mind, Newtek Bank has established four measurable goals in its CRA Strategic Plan. The first two goals directly relate to the Bank's largest loan program, its SBA 7(a) lending. The last two goals relate to CD activities (CD loans, qualified investments, CD grants and donations, and CD services) in the AA, the broader statewide or regional area that includes the AA and, if certain conditions are met, in the state of Florida as a whole, even if the activity may not directly benefit the Miami AA.³⁰

- **Goal 1: SBA 7(a) Market Rank in the AA.** The Bank's goal for Satisfactory performance is to be a Top 7 commercial bank SBA 7(a) lender in the Miami AA during the five-year Plan period. The Bank's goal for Outstanding performance is to be a top 3 commercial bank SBA 7(a) lender in the market in number of loans and top 3 commercial bank SBA 7(a) lender in aggregate dollar volume of loans throughout the Plan period.

The purpose of this goal is to demonstrate the Bank's commitment to serving the credit needs of SMBs throughout the Miami AA, even as most of the Bank's lending, due to its Internet-based lending platform, will be to SMBs outside the AA and throughout the nation. The Miami MSA is a very competitive market with 106 small business lenders making SBA 7(a) loans in the Miami AA during the first six months of 2024. The top lenders are mostly large commercial banks, including Bank of America, JP Morgan Chase, Wells Fargo, Truist, Huntington Bank, and TD Bank. The other market leaders are nationwide lenders relying on digital platforms, including Newtek Bank, Live Oak Bank, and Readycap Lending LLC. During the first six months of 2024, Newtek Bank approved 176 SBA 7(a) loans in the Miami AA, which ranked second among commercial banks in the number of SBA 7(a) loans originated in the market, behind only TD Bank. Newtek was the top lender in the market measured by the total dollar amount of loans approved, with more than \$100 million in approvals during the first half of 2024.³¹

- **Goal 2: Distribution of SBA 7(a) Loans in the AA by Census Tract Income.** The Bank's goal for Satisfactory performance is to achieve at least 70 percent of the applicable market demographic comparators (percentage of businesses in LMI geographies in the Miami AA) escalating to 75 percent during the Plan period.³² The Bank's goal for Outstanding performance is to achieve

²⁹ Interagency Questions and Answers Regarding Community Reinvestment at § __.12(h)-6, 81 FR 48529 (July 25, 2016). § __.22(b) 2 + 3-4. 6, 81 FR 48538 (July 25, 2016).

³⁰ Ibid.

³¹ Source: Small Business Administration, SBA 7(a) lender activity report, **lender7aactivity_fy2024_20240731**, July 31, 2024.

³² The market demographic comparators are the percentage of businesses in the AA that are in low- and moderate-income census tracts and the percentage of businesses in the AA that report GAR of \$1 million or less.

100 percent of the market demographic comparators, escalating to 105 percent during the Plan's term. This goal demonstrates Newtek Bank's commitment to fairly, responsibly, and equitably lending to businesses in geographies of all income levels, including LMI geographies, in the delineated Miami AA. Although examiners often review lending in low-income and moderate-income geographies separately, the Bank has proposed to combine low- and moderate-income geographies for this goal; the relative paucity of businesses (less than 3 percent) in low-income geographies in the Miami AA means a single loan or two could have an outsized impact on measurements in low-income geographies.

- **Goal 3: The Amount of CD Loans and Qualified Investments in the AA and BSRA.**³³ This community development goal represents a goal for CD loans and investments that benefit the Miami AA or the Florida BSRA. By being responsive to CD needs and opportunities in its AA, the Bank will also receive consideration for CD loans and qualified investments throughout the Florida BSRA. Also included are certain loans or investments, such as loans to or deposits in low-income credit unions or MWFIs, which by rule qualify, without regard to the specific geographic location in which the funds are deployed.

The Bank's initial goal for Satisfactory performance is for CD loans and qualified investments to exceed 7 percent of T1Cap. Its initial goal for Outstanding performance is for CD Loans and Qualified Investments to exceed 10 percent of T1Cap. So long as Newtek is deemed by examiners to be adequately responsive to CD needs in the Miami AA, examiners will also consider CD Loans and Qualified Investments throughout Florida, even those without potential benefit to the Miami AA, consistent with current CRA regulations and guidance.³⁴ The annual Satisfactory and Outstanding goals increase over the life of the Strategic Plan – to 10 and 14 percent of T1Cap respectively during calendar years 2028 and 2029.

Although most CRA Strategic Plans establish CD lending and qualified investment goals relative to average total assets, Newtek has established goals relative to its Tier 1 Capital, which is the standard normally employed by OCC examiners in large bank CRA evaluations. The target level of CD lending and investment, though, is comparable to the CD lending and qualified investment goals established in other CRA Strategic Plans.

³³ Includes CD Loans and Qualified Investments that are in the broader statewide or regional area that includes the AA. Qualified investments include, but are not limited to, investments, grants and donations, deposits, or shares in qualifying CD organizations, community development financial institutions ("CDFIs"), minority- and women-owned financial institutions ("MWFIs"), and low-income credit unions.

³⁴ Q&A § 11.12(h)–6 states that an institution will receive consideration for activities that benefit geographies or individuals located somewhere within a broader statewide or regional area that includes the institution's assessment area(s) even if they will not benefit the institution's assessment area(s), as long as the institution has been responsive to community development needs and opportunities in its assessment area(s). When considering whether an institution has been responsive to community development needs and opportunities in its assessment area(s), examiners will consider all the institution's community development activities in its assessment area(s). Examiners will also consider as responsive to assessment area needs community development activities that support an organization or activity that covers an area that is larger than, but includes, the institution's assessment area(s).

- **Goal 4: The Amount of CD Services in the AA.** The Bank’s initial goal for Satisfactory performance is qualifying CD service hours of 93 hours or more in the AA and 231 hours in the state of Florida in 2025. Its initial annual goal for Outstanding performance is for qualifying CD service hours of 186 hours in the AA and 462 hours in the state of Florida overall. The annual Satisfactory and Outstanding goals will increase during the term of the Strategic Plan. By 2028, the annual goal for CD service hours for “Satisfactory” is 155 hours in the AA and 385 hours in Florida. The “Outstanding” goal is 248 hours in the AA and 616 hours in Florida. Those goals will grow commensurately with any increases in Bank employment in the Miami AA or Florida.

Because CD service is a corporate priority, the Bank also commits to providing CD services outside the state of Florida where the Bank has employees located. Current interagency guidance, however, does not permit consideration of CD services outside the AA or the statewide or regional area in which the AA is located. Therefore, there is no goal for CD service hours outside of Florida. Newtek employees, though, will provide CD services wherever they are located, as part of the Bank’s commitment to service in the communities in which it operates. Those CD service hours will comprise a variety of activities to include, but not be limited to, financial education targeted to LMI persons/households; budgeting and credit management services for SMBs and MWOBs; and service on the boards and finance committees (or comparable) of non-profit CD organizations.

For each goal, the Bank has established in this Plan a measurable annual target for Satisfactory performance and a higher target for Outstanding performance. Goals for the full five-year Plan term are also identified. The Plan covers five calendar years from February 21, 2025, through December 31, 2029.

C. Goal 1: Market Rank for SBA 7(a) Loan Originations in Miami AA

The SBA 7(a) loan program is the U.S. Small Business Administration’s most-widely used loan program for providing funding assistance to SMBs. This program offers loans up to \$5 million, which can be used for a variety of purposes, including, but not limited to, purchasing real estate, constructing a new building or office, acquiring/installing machinery, furniture, or fixtures, or financing a change in ownership.³⁵ Loans are available for eligible U.S. businesses, that meet the size and profitability requirements of the program. Businesses apply to an SBA-approved lender, like Newtek Bank. Rates and terms vary and are negotiated between the borrower and

³⁵<https://www.sba.gov/funding-programs/loans/7a-loans#id-what-is-aa-loan>. [7\(a\) loans | U.S. Small Business Administration \(sba.gov\)](https://www.sba.gov/7(a)-loans)

lender. The SBA provides the lender a guarantee, normally between 75 and 85 percent of the loan.³⁶ Eligible SMBs often can obtain access to longer-term loans with more flexible features than may be available without the SBA guarantee.

Newtek Bank is a preferred provider of SBA approved loans, which means that the Bank has delegated authority to approve SBA 7(a) loans pursuant to program guidelines, but without obtaining prior approval from the SBA. Newtek is among the nation’s leading SBA lenders with an active referral program, on-line applications, timely decisions, and a wide array of support services that are provided for SMB borrowers by the Bank and/or one or more of its affiliates.

Unlike a traditional bank, Newtek Bank’s digital platform allows it to serve SMBs anywhere in the country, and most of its loans will be made outside of the delineated Miami AA. Nevertheless, the Bank plans to be an active lender in its AA. Although the Bank presently ranks last among 85 banks in the AA by deposit market share, Newtek Bank has established a goal for Satisfactory performance of being ranked among the top 5 SBA 7(a) lenders in the AA by both number and volume of loans for each Plan year. Its goal for Outstanding performance is being ranked among the top 3 SBA7(a) commercial bank lenders in the AA in number of loans and loan volume.

Goal 1: SBA 7(a) Loan Originations in the MIAMI AA^{37 38}
(Market Rank among Commercial Bank Lenders)

Plan Year	Satisfactory Goal		Outstanding Goal	
	<u>Number of Loans</u>	<u>Dollar Amount of Loans</u>	<u>Number of Loans</u>	<u>Dollar Amount of Loans</u>
2025	Top 7	Top 7	Top 3	Top 3
2026	Top 7	Top 7	Top 3	Top 3
2027	Top 7	Top 7	Top 3	Top 3

³⁶ 85 percent guarantee for loans of \$150,00 or less and 75 percent guarantee for loans over \$150,000. Standard SBA 7(a) loans can be as large as \$5 million, but certain other programs, including small loans and express loans, may have lower maximums.

³⁷ The Bank’s delineated Miami AA is the Miami-Fort Lauderdale-West Palm Beach MSA, which is MSA #33100 comprising Miami-Dade, Broward, and Palm Beach Counties.

³⁸ See publicly available report on the SBA website link here, [SBA lender activity reports](#) (e.g., lender7aactivity_fy2024_20240731), the third tab of the report named ‘Lender_ProjCnty’ includes data by county for the number and amount of approved loans year to date. The reports can be customized to show activity by lender for any MSA, which is what will be used to measure Newtek Bank’s lending performance relative to the Plan goal for market rank in the Miami AA comprising Miami-Dade, Broward, and Palm Beach Counties.

Goal 1: SBA 7(a) Loan Originations in the MIAMI AA^{37 38}
(Market Rank among Commercial Bank Lenders)

2028	Top 7	Top 7	Top 3	Top 3
2029	Top 7	Top 7	Top 3	Top 3
2025-2029	Top 7	Top 7	Top 3	Top 3

D. Goal 2: Geographic Distribution of SBA 7(a) Loans in Miami AA

Examination standards for Small Bank and ISBs include a performance standard that evaluates the geographic distribution of small business loans in its AA(s) by the income of the geography in which the business is located. For Satisfactory or better performance, the geographic distribution of a bank's loans should reflect the distribution of businesses in the AA, irrespective of census tract income.

The federal bank regulatory agencies have not established formal benchmarks for satisfactory borrower and geographic distribution. However, CRA examinations normally consider geographic loan distribution relative to an aggregate lending comparator (i.e., the percentage loans in an AA made in LMI census tracts by all lenders in the market) or relative to demographic comparator (i.e., the percentage of small businesses in the AA located in LMI census tracts). For Goal 2, Newtek Bank compares the percentage its SBA 7(a) loan originations in LMI geographies in the Miami AA to the demographic comparator, the percentage of businesses in the Miami AA whose principal locations are in LMI geographies. For Satisfactory performance, the Plan establishes an initial goal that the percentage of the Bank's SBA 7(a) loan originations will be at least 70 percentage of the demographic comparator. The goal grows to 75 percent beginning in 2027. For Outstanding performance, the Plan begins with the Bank achieving a borrower and geographic loan distribution that meets or exceeds 100 percent of the demographic comparator. The goal grows to 105 percent by the end of the applicable period.

The most recent data available show the demographic comparator to be 25.3 percent of businesses in the Miami AA are in LMI tracts. Separate goals for lending in low-income and moderate-income geographies are not proposed because the relative paucity of businesses located in low-income tracts would result in measurements that would be disproportionately affected by a small number of loans. Only 2.9 percent of businesses in the Miami AA are in low-income census tracts.

Demographic Small Business Lending Comparator for the Miami AA	
Percentage of Businesses Located in Low-Income Geographies	2.9%
Percentage of Businesses Located in Moderate-Income Geographies	22.4%
Demographic Comparator: Percentage of Businesses in LMI Geographies	25.3%

Source CRA Wiz, Table A, 2023 D&B Data.

Given the demographic comparators in the Miami AA, Newtek Bank has established goals for the distribution of its SBA 7(a) loans by census tract income, which are presented in the following table. For Satisfactory performance, the Bank's goal is initially 70 percent of the demographic small business lending comparator, which is the percentage of businesses in LMI geographies as listed in the preceding table. The goal for Satisfactory increases to 75 percent in 2027. For Outstanding performance, the Bank's goal is initially 100 percent of the demographic small business lending comparator listed in the preceding table. The goal for Outstanding increases to 105 percent of the demographic comparator in 2027. For the full period from 2025 through 2029, the goal for Satisfactory performance is 75 percent of each demographic comparator, and the goal for Outstanding performance is 105 percent of each demographic comparator. The details established for Goal 2, by year and for the full Plan period, are shown in the following table.

Goal 2: Geographic Distribution of SBA 7(a) Loan Originations in Miami AA

Year	Demographic Comparator	Geographic Distribution ³⁹			
	Businesses in LMI Tracts	Relative to Demographic Comparator		Originations in LMI Geographies	
		Satisfactory	Outstanding	Satisfactory	Outstanding
2025	25.3%	70%	100%	18%	25%
2026	25.3%	70%	100%	18%	25%
2027	25.3%	75%	105%	19%	27%
2028	25.3%	75%	105%	19%	27%
2029	25.3%	75%	105%	19%	27%
2025-2029	25.3%	75%	105%	19%	27%

Note: 25.3% of businesses in Miami AA in 2023 are in LMI geographies, which serves as the demographic comparator. Because so few businesses are in low-income tracts (2.9%) the Bank concluded a separate goal for low-income tracts would not be meaningful. Combining low- and moderate-income census tracts captures the Bank's commitment to serving LMI census tracts compared to middle- and upper-income census tracts.

E. Goal 3: CD Loans and Qualified Investments

In establishing a CD Loan and Qualified Investment goal, the Bank began by consulting the goals established by other banks with nationwide operations and operating pursuant to an approved CRA Strategic Plan. Among those banks, Newtek Bank sought to identify those that were most like Newtek based on having a branchless nationwide SBA lending platform, a single assessment area, and assets of \$1 billion or less. Although none of the banks operating under an approved CRA Strategic Plans were “similarly-situated” in all those

³⁹ 70% of demographic comparator in 2025 and 2026 ($.7 \times 25.3\% = 18\%$); 75% of demographic comparator in 2027 -- 2029 ($.75 \times 25.3\% = 19\%$). 100% of demographic comparator in 2025 and 2026 ($1 \times 25.3\% = 25\%$), 105% of demographic comparator in 2027 – 2029 ($1.05 \times 25.3\% = 27\%$).

ways, two banks operating under FDIC-approved CRA Strategic Plans were nationwide SBA lenders – Live Oak Bank and Celtic Bank. The former bank is most similar in its business model and portfolio mix, but it is substantially larger than Newtek Bank with \$8.1 billion in total assets. The latter makes SBA loans, but largely originates loans on behalf of third parties or “strategic lending partners.” Celtic Bank has \$2.4 billion in assets. Another bank operating pursuant to an approved CRA Strategic Plan, the Bancorp Bank N.A., is like Newtek Bank in that it is a national bank, operates no branch offices or deposit-taking ATMs, and has delineated a single AA around its main office. Bancorp Bank originates SBA loans, but it is substantially larger than Newtek Bank and offers a wider array of loan products, including consumer and real estate lending. With \$7.7 billion in assets, it would be considered a Large Bank for CRA evaluation purposes. A fourth bank, Continental Bank, is a lender specializing in financing commercial equipment nationwide out of a single office. It has assets of \$169 million. Finally, Varo Bank is an OCC-supervised national bank with \$476 million in assets that is a nationwide lender, principally operating out of a single bank office. However, Varo Bank does not offer SBA loans and specializes in offering deposit services and secured credit cards to LMI persons and households.

Although none of these five lenders are true peers of Newtek Bank, their CRA Plans offer insight into CD Lending and Qualified Investments goals that for banks offering a limited product line to a nationwide market. For most of these banks, CD lending and qualified investment goals in approved CRA Strategic Plans have been stated relative to a bank’s average total assets. However, OCC examiners typically evaluate national banks CD loans and qualified investments relative to the bank’s Tier One Capital (“T1Cap”), and some CRA Plans submitted to and approved by the OCC have established CD loan and investment goals as a percentage of T1Cap.

Representative yearly community development and qualified investment goals in approved CRA Strategic Plans are shown in the following table. Each of the banks set CD lending and investment goals relative to average total assets.⁴⁰

⁴⁰ In its most recent CRA Strategic Plan covering 2023-2025, Bancorp Bank has set CD loan and investment goals relative to T1Cap. Its CD lending and qualified investment goal relative to T1Cap for Satisfactory performance is 11% in 2023, 13% in 2024, and 15% in 2025. For outstanding performance its goals are 13%, 14%, and 17% in 2023, 2024, and 2025 respectively.

Representative Community Development Lending and Investment Goals
(Selected Banks with Approved CRA Strategic Plans)

Bank	CD Loans and Cumulative Qualified Investments Goal (Percent of Average Total Assets)		CD Loans and New Qualified Investments Goal (Percent of Average Total Assets)	
	Satisfactory	Outstanding	Satisfactory	Outstanding
Live Oak Bank	1.45%	1.70%	0.36%	0.425%
Bancorp Bank N.A.	1.6%	1.95%	0.35%	0.45%
Varo Bank N.A.	0.5%	0.6%	NA	NA
Celtic Bank	0.5%	NA	0.40%	0.60%
Continental Bank	NA	NA	0.10%	0.20%

Like these other banks that are operating pursuant to a CRA Strategic Plan, Newtek Bank proposes to establish a community development lending and qualified investment goals in its CRA Strategic Plan.⁴¹ Based on informal feedback from its regulator, however, Newtek has established CD lending and qualified investment goals relative to T1Cap rather than average total assets.

For comparison purposes, the Plan assumes Newtek Bank has a T1Cap ratio of 15.2 percent,⁴² which was the Bank's four-quarter average T1Cap ratio as of June 30, 2024. The following table restates the Representative CD lending and qualified investment goals of

⁴¹ Examples of qualified investments include, but are not limited to, investments, grants, deposits, or shares in or to qualifying organizations with a CD purpose. See Q&A § 11.12(i)—4: *What are examples of qualified investments?*

⁴² The ratio of Tier 1 Capital to Risk-Weighted Assets.

relative to T1Cap assuming a T1Cap equal to 15.2 percent of Average Total Assets. The purpose is to ensure that Newtek Bank has set CD lending and qualified investment goals comparable to other banks that have chosen to implement a CRA Strategic Plan.

Representative CD Lending and Investment Goals Relative to T1 Capital
(Assuming T1 Capital Equals 15.2% of Average Total Assets)

Bank	CD Loans and Cumulative Qualified Investments Goal (Percent of Tier One Capital)		CD Loans and New Qualified Investments Goal (Percent of Tier One Capital)	
	Satisfactory	Outstanding	Satisfactory	Outstanding
Live Oak Bank	9.5%	11.2%	2.4%	2.8%
Bancorp Bank N.A.*	10.5%	12.8%	2.3%	2.6%
Varo Bank N.A.	3.3%	3.9%	NA	NA
Celtic Bank	3.3%	NA	2.6%	3.9%
Continental Bank	NA	NA	0.65%	1.3%

In measuring its CD lending and investment, Newtek Bank would count CD loans and qualified investments (including eligible grants and donations) in the Miami AA and the broader BSRA, which in this Plan is defined as the state of Florida. As per CRA regulations and guidance, Newtek Bank will also receive consideration for activities that benefit geographies or individuals in the state of Florida, even if those CD activities do not directly benefit the Miami AA, if the Bank has been responsive to community development needs and

opportunities in the Miami AA.⁴³ In addition, as established by the CRA regulations and guidance, certain CD investments, such as deposits in MWFIs, will be considered without regard to the geographical location of the institution receiving the deposit.⁴⁴

The following table sets forth Newtek Bank's CD Lending and Qualified Investment goals for 2025-2029. CD loans in any year will be measured by the dollar volume of all CD loans originated by Newtek Bank in that year. Qualified investments each year will be measured by the book value of investments on the Bank's balance sheet as of December 31 of that year and will include investments made during the year and investments that may have been made in a prior period that remain on the Bank's balance sheet.⁴⁵ Grants and donations made during the year that meet the CD purpose test are also included, as per the CRA regulations.

Goal 3: Community Development Lending and Investment Goals (Percent of Tier One Capital)		
Year	Satisfactory	Outstanding
2025	7	10
2026	9	11
2027	9	11
2028	10	14
2029	10	14
2025-2029	9	12

** Includes Qualifying Nationwide CD Loans and Investments, such as deposits in or loans to MWFIs and CDFIs or loans or investments in support of Federal, State, Local, or Tribal government programs, projects, or initiatives that serve designated disaster areas or Native / Tribal lands.*

⁴³ Q&A § 11.12(h)–6 states that an institution will receive consideration for activities that benefit geographies or individuals located somewhere within a broader statewide or regional area that includes the institution's assessment area(s) even if they will not benefit the institution's assessment area(s), as long as the institution has been responsive to community development needs and opportunities in its assessment area(s).

⁴⁴ § 11.12(h) Community Development Loan § 11.12(h)—1: What are examples of community development loans? A1. Examples of community development loans include loans to . . . financial intermediaries including Community Development Financial Institutions (CDFI), New Markets Tax Credit-eligible Community Development Entities, Community Development Corporations (CDC), minority- and women-owned financial institutions, community loan funds or pools, and low-income or community development credit unions that primarily lend or facilitate lending to promote community development. Federal Register / Vol. 81, No. 142, July 25, 2016, p. 48528.

⁴⁵ See for example Q&A § 11.12(t)—8: *When evaluating a qualified investment, what consideration will be given for prior period investments?*

This community development goal represents a goal for CD loans and investments that benefit the Miami AA or the broader statewide or regional area that includes the Miami AA. By being responsive to CD needs and opportunities in its AA, the Bank will also receive consideration for CD loans and qualified investments that benefit elsewhere in the state of Florida, or those that qualify, as specified in the CRA regulation and regulatory guidance, without regard to the specific geographic location because they benefit community development financial institutions (“CDFIs”), low-income credit unions, and MWFIs, including loans to and deposits in minority- and women-owned financial institutions or loans that support community development on tribal lands or designated disaster areas.⁴⁶

Qualifying CD loans and investments may include, but will not necessarily be limited to, the following.

- **Loans that Lead to Permanent Job Creation.** Business loans for amounts more than \$1 million that are originated for business customers within the Miami AA or in the state of Florida may have a qualifying CD purpose if they finance workplace expansion in LMI geographies or permanent job creation from among LMI persons. These could include, for example, SBA loans in an amount greater than \$1 million when made as a part of the SBA’s 504 Certified Development Company program.
- **Investments that Stimulate Business, Manufacturing, Retail, and Real Estate development in LMI communities.** Investments in New Markets Tax Credits will have a qualifying CD purpose by supporting reinvestment in LMI communities that have high retail or manufacturing vacancy rates, tattered storefronts, outdated facilities and infrastructure, and inadequate access to education and healthcare services. These investments promote increased manufacturing, retail, office, and service capacity in LMI communities. Similarly, investment in an SBIC would support long-term loans and/or venture capital funding for small firms, which would normally qualify as a CD investment pursuant to current regulatory guidance.
- **Loans, Investments and Grants for Affordable Housing.** Investments in LIHTCs⁴⁷ or targeted MBS that provide housing that is affordable for LMI households would normally qualify if the residents of the housing are primarily LMI individuals and households. Support in the form of loans, investments, or grants for local organizations that develop or provide affordable housing for LMI persons and households also qualify. A loan or grant to a non-profit organization that has as a primary purpose the construction or rehabilitation of housing for LMI persons or a loan to construct or rehabilitate community facilities that are

⁴⁶ See § 11.21(f) Activities in Cooperation with Minority- or Women-Owned Financial Institutions and Low-Income Credit Unions. Federal Register / Vol. 81, No. 142, July 25, 2016, p. 48535-28536.

⁴⁷ A LIHTC (Low Income Housing Tax Credit) provides funding for the development of multifamily rental housing targeted for use by LMI persons. LIHTCs allow an investor (such as a financial institution) to take a federal tax credit equal to a percentage of the cost incurred for development of the eligible rental housing project. The project must continue to serve LMI persons for a sustained period (typically 15 years) to remain eligible for the tax credit.

in LMI geographies or that primarily serve LMI individuals would also qualify. In each case, affordable housing must serve LMI populations in the Miami AA or in Florida, but it does not need to be in LMI geographies.

- **Loans, Investments, or Grants to/for Community and Economic Development Organizations.** Support for non-profit organizations in the Miami AA or in Florida that foster development in LMI areas, enhance essential infrastructure in LMI neighborhoods or distressed rural areas, or provide essential community health, or education, or day-care services qualify as having a CD purpose. Examples would include investments or deposits in CDFIs or other CD entities that fund activities that contribute to permanent job creation, job retention, and workplace improvements among LMI individuals or serve LMI individuals or geographies through expanded housing, employment, or retail services. Community and economic development in areas targeted for redevelopment by Federal, state, local, or tribal governments; by financing intermediaries that lend to, invest in, or provide technical assistance to start-ups or recently formed small businesses; and through technical assistance or supportive services for small businesses or farms, such as shared space, technology, or administrative assistance also qualify.⁴⁸
- **Loans, Investments, or Grants to/for Organizations that Provide Community Support Services.** Investments and grants that expand access to childcare, education, job training and workforce development, and healthcare services targeted to LMI persons or communities qualify. Especially important are community services in LMI areas and serving an LMI clientele that may have previously lacked access to such services.
- **Loans, Investments, or Grants to Finance the Revitalization of Traditionally Distressed Areas.** Investments in Federal, State, Local, or Tribal government programs, projects, or initiatives established to revitalize or stabilize distressed areas, designated disaster areas, or Native / Tribal lands also qualify as having a CD purpose. Deposits in CDFIs or MWFIs and financial institution's serving Native American persons and Indian Country have qualifying CD purposes, as would loans to finance environmental cleanup or redevelopment of an industrial site as part of an effort to revitalize or stabilize an LMI community.

Newtek Bank does not know the full breadth or range of the CD loans and investments it will make. However, the Bank will actively engage in CD lending and investment that supports economic development, affordable housing, community services targeted to LMI persons, and community revitalization and stabilization in its Miami AA and the state of Florida, taking into account each year the information it gleans from its own research and from its communications with stakeholders, including organizations with a CD purpose operating in the Miami AA or the broader statewide and regional area that includes the Miami AA.

⁴⁸ Federal Register / Vol. 81, No. 142 / Monday, July 25, 2016 / Rules and Regulations, page 48508.

In its outreach to the community, Newtek Bank has consistently heard from community development organizations that grants are essential for strengthening their capacity. Newtek Bank is committed to use its program of charitable giving to support community development activities in its community. Under the CRA regulations, grants and donations that have a CD purpose qualify as CD investments if they have as their primary purpose community development as defined in the regulations.⁴⁹ Charitable contributions, whether in cash or an in-kind contribution of property, are considered grants. A grant is not disqualified as a qualified investment even if it receives favorable tax treatment (for example, as a tax deduction or credit) under the Internal Revenue Code.⁵⁰ Because Newtek Bank is relatively new to the Miami AA and is just beginning to establish community development partnerships, it is beginning from a relatively low base. The Bank will steadily grow its qualifying grants and donations over time as its community relationships mature and the Bank's size and capacity increase.

F. Goal 4: Community Development Service Hours During the Calendar Year

Newtek Bank supports the volunteer services of its employees and members of the Board of Directors. The Bank emphasizes community development services that provide financial education and first-time homebuyer, complementary counseling to small businesses and start-ups, accounting and financial management advice to nonprofit community development and community services organizations, and board and finance committee service in support of nonprofit community development organizations and organizations that are involved in economic development, stabilization, or revitalization efforts.

As established by the CRA regulations, the Banks goals for services will be focused within the Miami AA and the broader statewide or regional area that includes the Miami AA. As of the development of the Plan, the Bank had 354 employees nationally; 77 employees in Florida; and 31 employees in the Miami AA. In 2025, the Bank's CD service goal for the Miami AA is 3 hours per FTE per year, which increases by 2027 to 4 hours per FTE per year for Satisfactory performance and 7 hours per FTE per year for Outstanding.

Goal 4.A: CD Service Goals in AA and in Florida			
	(CD Service Hours per FTE)		
	2025	2026-2027	2028-2029
Satisfactory	3	4	5
Outstanding	6	7	8

⁴⁹ See for example, Q&A § 11.12(t)—5: *Will an institution receive consideration for charitable contributions as “qualified investments”?*

⁵⁰ Federal Register / Vol. 81, No. 142 / Monday, July 25, 2016 / Rules and Regulations, page 48533.

Given Newtek Bank has 31 employees in the Miami AA and 77 total in the state of Florida, Newtek is establishing an initial annual goal of 93 hours of CD services for Satisfactory in 2025 rising to 124 hours of CD Services for Satisfactory beginning in 2026. The number of hours for a rating of Outstanding is 186 hours for 2025 rising to 217 hours in 2026 and 248 hours in 2028, and 2029. The Bank's initial annual CD service hour goals for the state of Florida (its delineated BSRA) are 231 hours for Satisfactory and 462 hours for Outstanding. Those annual goals grow to 385 hours for Satisfactory Performance and 616 hours for Outstanding by 2028. ***If the Bank's employee count in Miami or Florida rises, the aggregate CD service goals shown for Goal 4.B will increase commensurately consistent with the hours per FTE shown in the preceding table for Goal 4.A.***

The existing regulation does not recognize CD services delivered outside a Bank's delineated AA or BSRA. Consequently, Newtek Bank has not established a formal CD service goal for its employees that work outside the state of Florida. However, the Bank intends to perform CD services wherever its employees may work. In addition, the Bank will offer matching gifts and/or other incentives to employees to support organizations providing donations or qualifying community development services in the Miami AA or the broader statewide or regional area that includes the Miami AA.

Goal 4.B: CD Service Goals in AA and in Florida*				
(Aggregate CD Service Hours)				
Plan Year	Miami AA		Florida	
	Satisfactory	Outstanding	Satisfactory	Outstanding
2025	93	186	231	462
2026	124	217	308	539
2027	124	217	308	539
2028	155	248	385	616
2029	155	248	385	616
2025-2029	651	1,116	1,617	2,772

*The CD service hours for the state of Florida include all CD service hours in Florida, including those in the Miami AA.

On a per employee basis, the service hour goals Newtek has established are substantially higher than those established by other banks operating pursuant to an approved CRA Strategic Plan. For example:

- Live Oak Bank is a state chartered commercial bank focusing on small business lending, principally through the SBA 7(a) lending program. Like Newtek Bank, Live Oak Bank serves a national market through its internet delivery systems and loan production offices. Like Newtek Bank, Live Oak Bank states that its objective is to be “the premier provider of credits secured by government guarantees pursuant to Section 7(a) of the Small Business Investment Act.”⁵¹ Live Oak Bank has approximately 700 employees in its Wilmington NC assessment area – more than 20 times the number of employees of Newtek Bank in its Miami AA. Live Oak’s goal for Satisfactory and Outstanding CD service hours for 2023 of 270 and 320 hours respectively represents less than one-half hour per employee per year.
- Varo Bank is a nationally chartered commercial bank with a single assessment area comprising the Salt Lake City-Provo-Orem Combined Statistical Area and a BSRA comprising the remaining states in the West Region of the United States.⁵² Like Newtek Bank, Varo Bank is a nationally chartered digital bank with no branch offices. Varo Bank offers a different and broader range credit products, principally consumer credit products, than does Newtek Bank. Although Varo Bank has fewer assets than Newtek Bank, Varo Bank more than eight times the number of employees in its delineated AAs than Newtek Bank employs in its Miami AA. Its CD service hour goals, however, are limited to just 12 managerial employees in the AA and 41 in the BSRA. Varo Bank’s CD service hour goals are 2 hours per management level employee for a satisfactory rating and 3 hours per management level per year for an outstanding rating.

To further support its CD Service goals, Newtek reviewed the CD Service record of all national banks (or federal savings banks) that are classified as intermediate small banks (“ISBs”) and whose CRA performance evaluations (“PEs”) were issued during the first nine months of 2024.⁵³ Although Newtek Bank is currently considered to be a Small Bank for CRA purposes, increases in Newtek Bank’s total assets in 2023 and the 2024 will likely result in Newtek Bank being considered an ISB beginning in 2025. As such, ISBs are most comparable to Newtek Bank in terms of size, scale of operations, and CD services.

The level of CD service hours varies greatly among the ISBs. For example, one institution recorded 5,142 hours over three years, whereas another institution had just 256 hours during the same period. Because ISBs vary in size and employee count, Newtek

⁵¹ Live Oak Bank, Community Reinvestment Act Strategic Plan 2021-2023, p. 3.

⁵² https://www2.census.gov/geo/pdfs/maps-data/maps/reference/us_regdiv.pdf

⁵³ During the first nine months of 2024, the OCC issued 23 PEs for Intermediate Small Banks. The list of those banks and information about asset size, CD service hours, employee count, branch offices, and CD service hours per FTE per year are shown in a table in Appendix A of this Plan.

normalized the data by calculating the number of CD service hours per FTE per year for each bank.⁵⁴ The results are shown in Appendix A of this Plan. CD service hours were not reported for four of the ISBs. For the other 19, the annual service hours per FTE ranged from a high of 13.9 hours to a low of 0.7 hours. The median value was 3.4 hours per FTE per year. The mean value was 4.6 hours per year.

Newtek Bank's goal for "Satisfactory" grows from 3 hours per FTE per year in 2025 to 5 hours per FTE per year in 2027-2029. Its "Outstanding" goal grows from 6 to 8 hours per FTE per year over the Plan period. From the first year, the Newtek Bank's CD service "Outstanding" goal exceeds both the median and mean value of the CD service hours per FTE at comparator banks. By 2027, the Bank's CD service "Satisfactory" goal exceeds both the median and mean value of annual CD services hours per FTE among the comparator banks.

No PEs had been issued for ISBs headquartered in the state of Florida during the first nine months of 2024. Consequently, no Florida banks were included among those comparator banks. To include ISBs headquartered in Florida in its comparisons, Newtek Bank also reviewed PEs for national banks headquartered in Florida for which CRA PEs had been issued during the two years from September 2022 through September 2024. The OCC issued three such PEs.⁵⁵ One PE cited examples of CD services provided by the bank's personnel, but did not include the number of CD service hours. The other two PEs reported aggregate CD service hours for the evaluation period. One bank, with \$738 million in total assets, was credited with 523 service hours during its three-year evaluation period, or approximately 175 hours per year. The other bank, with \$454 million in total assets, was credited with 226 service hours during its three-year evaluation period, or approximately 75 hours per year. Using reported employee counts for those two banks,⁵⁶ it is estimated that those banks achieved annual CD service hours of 3.3 hours per FTE and 0.7 hours per FTE respectively. Newtek's CD service hour "Satisfactory" goals compare favorably to the performance of both banks, and the Bank's "Outstanding" goals exceed the performance of both banks.

⁵⁴ OCC did not report employee count or CD service hours in the PEs. For its calculations, Newtek used employee count as of September 2024 for each institution using iBanknet data, which can be accessed using the following link: <https://ibanknet.com/index.html>.

⁵⁵ Florida Capital Bank N.A., Heartland National Bank, and Intercredit Bank N.A.

⁵⁶ <https://ibanknet.com/index.html>.

SECTION 4. CRA PLAN DEVELOPMENT, MANAGEMENT, AND GOVERNANCE

A. The Bank's Commitment to CRA

Newtek Bank acknowledges its important obligation to serve the convenience and needs of the communities throughout the nation from which it will draw its deposits and in which it will operate. Newtek Bank believes its success derives from the financial success of its customers and the economic vitality of the communities in which they operate. To that end, Newtek Bank strives to be a leader in responsible lending to SMBs throughout the country.

Consistent with its CRA obligations, the Bank will pursue a robust CRA program within its delineated Miami FL Assessment Area. The Bank will develop relationships with leaders of local community development organizations, city and county government officials, and other community stakeholders to remain cognizant of local credit needs, particularly the needs for small business credit and community development loans, investments, and services. Newtek Bank will closely monitor its performance and take whatever steps are necessary to meet and exceed its approved CRA Strategic Plan goals.

NewtekOne has a history of strong community involvement and supportive civic leadership. The Bank will continue that legacy by developing relationships throughout its communities, investing in local nonprofit/charitable organizations, and contributing to business development and community and economic development throughout the Miami AA and in the state of Florida. The Bank's collaborative efforts will leverage Newtek Bank's and NewtekOne's financial expertise to offer the Bank's customers and community development partners with state-of-the-art business and financial solutions that are not readily available at typical banks or other financial services companies. Newtek Bank will build on NewtekOne's history of delivering business and financial solutions to its customers by using its networks and expertise to meet its commitment to help fuel economic and social progress among small businesses, LMI persons, and in LMI geographies.

B. Development of Newtek Bank's CRA Strategic Plan

The Bank's management took the following steps to develop the 2025-2029 CRA Strategic Plan:

- Assessed its digital platform relative to CRA performance tests to determine whether to elect to be examined under Small Bank examination standards or to propose a CRA Strategic Plan.
- Reviewed CRA Strategic Plans and CRA Performance Evaluations for other banks that already operate under an approved CRA Strategic Plan to understand the goals other banks have set and their performance relative to those goals.

- Consulted with former federal bank regulators in assessing the implications of the Bank's business model for its performance under the Small Bank examination standards compared to the requirements and expectations for a CRA Strategic Plan.
- Meeting with representatives of local community development organizations and advocacy organizations to help identify community development needs and to elicit recommendations for responding to community development, housing, and community services needs in the Miami AA.
- Reviewed demographic information and current economic conditions within the Bank's Miami AA to understand the performance context within which the Bank will operate and to assess community development needs and opportunities in the MSA.
- Assessed ways to promote financial education and financial planning among LMI households and SMBs in the Miami AA.
- Developed goals for CD lending and qualified investments, qualified CD grants and donations, and CD service hours that would be responsive to CD needs in the Miami AA and align with or exceed the goals established in the CRA Strategic Plans of similarly situated banks.

This proposed CRA Strategic Plan describes the Bank's business model, the demographic and economic characteristics of the assessment area surrounding its main office location in Miami FL, and the performance goals the Bank proposes for the five-year period from February 21, 2025, through December 31, 2029. The Bank commits to a goal of meeting or exceeding the metrics described in the Plan for Satisfactory performance in SBA 7(a) lending in the Miami AA, CD Lending and Qualified Investments, and CD Service Hours. The Bank expects to meet or exceed the goals for Satisfactory performance annually and over the full five years covered by the Plan.

Consistent with its balance sheet and business model, the Bank's CRA Plan prioritizes its small business lending and its goal to be a leader in serving the credit needs of SMBs in its Miami AA and nationwide through its SBA 7(a) lending. It seeks to supplement its lending to SMBs by addressing community development needs in its delineated Miami AA and the Florida BSRA through CD loans, qualified investments, grants and donations, and CD services. In addition, to making business loans that serve a CD purpose, the Bank will make a variety of qualified investments, make deposits in CDFIs and MWFIs, fund qualified grants to community development organizations, and its officers and employees will participate with organizations serving LMI households and communities in its delineated AA and the BSRA. The Bank will work with local, regional, or national organizations to provide direct services related to financial education and literacy and to promote educational, policy and product development, or other initiatives designed to promote financial access by WMBs, start-up businesses, and micro businesses. Services will be available to businesses nationwide, but the Plan's CD goals focus primarily on the Miami AA and the broader statewide or regional area that includes the Miami AA.

The effective date of the Bank's CRA Plan is expected to be February 21, 2025. Newtek Bank will maintain contact with community leaders, non-profit organizations, and other interested parties to determine critical needs in the community and for assistance in

implementation of its CRA program and this Plan. If the federal interagency CRA regulations are further revised during the five-year Plan term, the Bank will consult with its community partners and its OCC supervisory office to determine whether amendments to this CRA Plan would be warranted.

C. Program Oversight and Governance

The Bank's Board of Directors ("Board") has assigned senior management the responsibility to implement this CRA Strategic Plan, including outreach to internal and external stakeholders, steps to achieve Plan goals, processes to monitor progress in achieving those goals, and strategies to address any obstacles that may arise in meeting Plan goals.

Newtek Bank's CRA Officer is responsible for the day-to-day leadership and oversight of the Bank's CRA program and ensuring that the Bank's practices are responsive to the community development needs of the Miami AA, considering economic conditions in the AA, public input, the Bank's business strategy, and operational capacity.⁵⁷ The CRA Officer, together with other members of senior management, regularly communicate with community-based organizations in the Miami AA regarding community development needs and ways for the Bank, consistent with its core business strategies, to support community development in the area. The CRA Officer is expected to develop, maintain, and enhance expertise in leveraging private and government subsidies to enhance CD lending, qualified investments, and CD services.

In addition to monitoring the Bank's progress to achieve or exceed its CRA performance goals, the CRA Officer encourages the Bank's executive and management leaders to support community development organizations in the Miami AA through participation on their boards of directors, their risk committees, or their finance committees. The CRA Officer also informs local staff in the AA regarding opportunities to volunteer to assist targeted small businesses or LMI persons in the community through financial education, budgeting, or similar means. Finally, the CRA Officer reviews federal publications, including the Federal Register, for rulemakings or other issuances from the OCC regarding CRA, fair lending, and community development and participates in conferences and meetings with CRA officers and staff from other banking organizations.

The CRA Officer analyzes quarterly performance reports and scorecards to monitor the Bank's progress in meeting its Plan goals, provides semi-annual reports to the Bank's Risk Committee regarding the Bank's performance in meeting Plan goals, and prepares

⁵⁷ See for example, 12 CFR § 25.27(f).

annual reports to the Board regarding the Bank's CRA program, CRA initiatives, and progress toward meeting the goals included in the Bank's CRA Strategic Plan. The CRA Officer is responsible for an annual CRA self-assessment.

The Bank's Risk Committee:

- Meets with the Bank CRA Officer at least semi-annually to review CRA progress in meeting Plan goals.
- Receives and reviews semi-annual reports and the annual CRA self-assessment.
- Reviews the development of small business loan products that meet credit needs of SMBs and that could serve a community development purpose.
- Supports efforts to seek partnerships with governmental and community development organizations in furtherance of the Bank's community development initiatives.
- Supports volunteer services by Bank staff in furtherance of community development in the Miami AA.

The Board actively provides oversight of the development and implementation of the CRA Strategic Plan. In addition, the Board promotes a climate and culture supportive of CRA throughout the Bank and:

- Approves the Bank's CRA Strategic Plan and modifications to it before release for public comment and submission to the OCC for approval.
- Holds executive officers, including but not limited to the CRA Officer, accountable for meeting the Bank's CRA Plan goals.
- Receives progress reports and program updates from the CRA Officer no less frequently than annually.
- Reviews the Bank's record with respect to Plan goals for CD lending, qualified investment, qualified grants and donations, and CD service hours no less frequently than every 12 months.
- Ensures that Bank executive leadership is adequately engaged in the Miami AA and has incorporated internal and external feedback in the CRA Program as warranted.
- Reviews the results of the annual CRA self-assessment with the CRA Officer and the Bank's Risk Committee.

D. Information Required in Submission of a CRA Strategic Plan

The requirements for a CRA Strategic Plan are contained in the CRA regulations.⁵⁸ Newtek Bank's proposed CRA Strategic Plan satisfies each of these regulatory requirements.

A bank requesting approval for a strategic plan is required to include the following, plus any additional supporting information bank management may wish to provide.

1. The names of each bank joining in the strategic plan and a description of how they are affiliated. Note that the appropriate federal banking agencies approve a joint strategic plan only if the strategic plan provides measurable goals for each bank for each assessment area covered by the strategic plan.
2. For each bank, an identification of the assessment area(s) covered by the strategic plan, including a list of the geographies involved. A bank with more than one assessment area may prepare (1) a single strategic plan for all of its assessment areas or (2) one or more strategic plans for one or more of its assessment areas.
3. The proposed term of the strategic plan. A strategic plan may have a term of no more than five years.⁵⁹
4. This plan will take effect following OCC approval, the plan goals will be effective for the full 2025 calendar year and through 2029. The proposed effective date for the strategic plan goals is February 21, 2025.
5. A description of the bank's efforts to seek suggestions from members of the public, copies of written public comment(s) received, and, if the strategic plan was revised due to the comment(s) received, the initial strategic plan as released for public comment.
6. A copy of the required public notice and the name(s) of the newspaper(s) in which the required notice was published.
7. For each assessment area for each bank covered by the strategic plan, copies of any information developed in the bank's normal business planning that it wants the OCC to consider regarding lending, investment, and service opportunities in the assessment area, including a description of any legal constraints or limitations that affect the type of loans, investments, or services that the bank may make or offer.
8. For each bank covered by the strategic plan, measurable goals for helping to meet the credit needs of each assessment area covered by the strategic plan, particularly the needs of low- and moderate-income geographies and individuals.¹⁴ If the bank's strategic plan encompasses the activities of non-depository bank affiliates, it is not necessary to state separate goals for each non-bank affiliate. Generally, a bank's strategic plan must address all three performance categories (i.e., lending, investments, and

⁵⁸ 12 CFR 25.27 (national banks and federal branches) and 12 CFR 195.27 (savings associations).

⁵⁹ Refer to 12 CFR 25.27(c) (national banks and federal branches) and 12 CFR 195.27(c) (savings associations).

services), with an emphasis on lending and lending-related activities; the strategic plan nevertheless need not specify measurable goals in all three categories if the bank chooses a different emphasis. A focus on one or more performance categories may be appropriate if responsive to the characteristics and credit needs of the bank's assessment area(s), considering public comment and the bank's capacity and constraints, product offerings, and business strategy.¹⁵

9. For each assessment area for each bank covered by the strategic plan:

- The plan must include measurable goals that, if met, would constitute "Satisfactory" performance. Measurable goals should be stated in quantifiable terms. Banks are, however, provided flexibility in specifying goals. For example, a bank may provide ranges of lending amounts in different categories of loans. It could also be appropriate for a bank to plan to make a certain number of loans or to lend a specific amount in a particular area or with respect to a particular project. A bank might plan to provide community services measured in terms of the frequency of use or amount of staff resources involved. In addition, a bank could provide a menu of activities, each with a weighted point value, from which a measurable goal could be stated in point totals. Measurable goals may be linked to funding requirements of certain public programs or indexed to other external factors as long as these mechanisms provide a quantifiable standard.
- Multi-year strategic plans must include annual interim measurable goals.
- The bank's strategic plan may also include measurable goals for any bank covered by the strategic plan that, if met, would constitute "outstanding" performance for that bank.

10. For each bank covered under the strategic plan, whether the bank elects in its strategic plan to be evaluated under another assessment method (e.g., small, intermediate small, or large bank assessment method) if the bank fails to meet substantially the strategic plan goals for a satisfactory rating.

E. Public Comment

Newtek Bank published notice of the availability of its proposed CRA Strategic Plan on October 18, 2024, in the Sun Sentinel.

The interagency Community Reinvestment Act regulations require a bank that has developed a Strategic Plan to publish notice of the Strategic Plan and solicit formal written public comment for at least a 30-day period. In conformance with this requirement, Newtek Bank, N.A. hereby provided notice to the public of its plan to submit a CRA Strategic Plan to the Office of the Comptroller of the Currency. Written comments from the public concerning the Strategic Plan are encouraged. Individuals may review the Strategic Plan on-site at the Bank's branch location or by contacting the Bank's CRA Officer. To obtain a copy of the Bank's Strategic Plan at no charge to the requesting party, individuals may request a copy from the Bank's by phone or email by contacting the Bank's CRA Officer, Julio Hernandez at (516) 254-7554 or jhernandez@newtekone.com.

All written comments regarding the Strategic Plan were to be directed to the Bank's CRA Officer at the email listed above. Comments and suggestions were accepted until November 18, 2024. The Bank will review all comments and incorporate suggestions to the Strategic Plan at its discretion by amending the draft Plan to address concerns identified in the comments, where permissible under current CRA rules and regulations.

Newtek Bank did not receive any written comments nor suggestions from the public during the time in which the public notice was published.

Evidence of Public Notice follows.

[Newtek Bank, N.A. Sun Sentinel Public Notice of CRA Strategic Plan](#)

SUN-SENTINEL

Sold To:
Newtek Bank, N.A. - CU80186888
1111 Brickell Ave, Suite 135
Miami, FL 33131

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Miami, FL 33131

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State Of Florida
County Of Orange

Before the undersigned authority personally appeared
Rose Williams, who on oath says that he or she is a duly authorized representative of the SUN- SENTINEL,
a DAILY newspaper published in BROWARD/PALM BEACH/MIAMI-DADE County, Florida; that the
attached copy of advertisement, being a Legal Notice in:

The matter of 11745-Other Legal Notices,
Was published in said newspaper by print in the issues of, and by publication on the
newspaper's website, if authorized on Oct 18, 2024; Oct 19, 2024; Oct 20, 2024; Oct 21, 2024; Oct 22,
2024; Oct 23, 2024; Oct 24, 2024; Oct 25, 2024; Oct 26, 2024; Oct 27, 2024; Oct 28, 2024; Oct 29, 2024;
Oct 30, 2024; Oct 31, 2024; Nov 01, 2024; Nov 02, 2024; Nov 03, 2024; Nov 04, 2024; Nov 05, 2024; Nov
06, 2024; Nov 07, 2024; Nov 08, 2024; Nov 09, 2024; Nov 10, 2024; Nov 11, 2024; Nov 12, 2024; Nov 13,
2024; Nov 14, 2024; Nov 15, 2024; Nov 16, 2024; Nov 17, 2024; Nov 18, 2024
Self Service Multi-Product Purchase
Affiant further says that the newspaper complies with all legal requirements for
publication in Chapter 50, Florida Statutes.

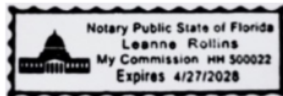


Signature of Affiant

Sworn to and subscribed before me this: November 19, 2024.



Signature of Notary Public



Name of Notary, Typed, Printed, or Stamped
Personally Known (X) or Produced Identification ()

Affidavit Delivery Method: E-Mail
Affidavit Email Address: jhernandez@newtekone.com
7712587

**REQUEST FOR PUBLIC COMMENT
COMMUNITY REINVESTMENT ACT
STRATEGIC PLAN OF NEWTEK BANK,
NATIONAL ASSOCIATION**

Newtek Bank, National Association
("Newtek Bank"), 1111 Brickell Avenue,
Suite 135 Miami, FL 33131, has developed
a Strategic Plan ("Plan") for purposes of
evaluation by the Office of the Comptrol-
ler of the Currency ("OCC") under the
Community Reinvestment Act of 1977 (12
U.S.C. § 2901) and its related regulations
(12 C.F.R. § 25.27).

We'd like to invite the community to sub-
mit comments in writing on the Strategic
Plan. Please submit all comments to
jhernandez@newtekone.com or Newtek
Bank, N.A., 1111 Brickell Avenue, Suite
135 Miami, FL 33131. The comment pe-
riod will end on November 18, 2024. Cop-
ies of all written comments you provide
from the date of this publication through
November 18, 2024, will be submitted
to the OCC.

The Strategic Plan is available for review
at no cost at Newtek Bank, N.A. 1111
Brickell Avenue, Suite 135 Miami, FL
33131. In addition, you may request a
copy of the Plan be delivered to you at
no cost either by email or via U.S. mail.
To request a copy of the Plan, please ad-
dress to jhernandez@newtekone.com or
Newtek Bank, N.A., 1111 Brickell Avenue,
Suite 135 Miami, FL 33131, Attn: Strategic
Plan Copy.
10/18/2024 - 11/18/2024 7712587

F. Request for OCC Approval of Newtek Bank N.A.'s CRA Strategic Plan

Newtek Bank respectfully submits that it has fulfilled the regulatory requirements for strategic plans, including those governing development of the plan and the involvement of the public in the determination of community needs. As established herein, the Bank's CRA performance context supports the Bank's measurable Plan goals. Management believes that OCC approval of the Bank's Plan is appropriate under the OCC's criteria for evaluation as outlined in 12 CFR § 25.27. For the reasons set forth above, the Bank respectfully requests OCC approval of this Strategic Plan.

G. Alternative Evaluation

The institution may elect in its plan to be evaluated under an alternative assessment method (i.e., the Lending, Investment, and Service tests for Large Institutions; the Small Institution performance standards; or the Lending and Community Development Test for an ISB, as appropriate) if it fails to substantially meet the Strategic Plan goals for Satisfactory as set forth in this CRA Strategic Plan.

H. Contact Information

For information regarding this Plan, please contact:

Julio Hernandez

Senior Vice President, Compliance Officer

Direct: (516) 254-7554

Mobile: (718) 613-9042

jhernandez@newtekone.com

APPENDIX A: COMMUNITY DEVELOPMENT SERVICE HOURS FOR INTERMEDIATE SMALL BANKS RECEIVING PEs IN 2024

Institution	Total Assets	Aggregate CD Service Hours	Employee Count	CD Service Hours / FTE (per Year)	Offices	Evaluation Period
Community National Bank	\$1,100,000,000	2,795 hours	130	7.2	12	2020, 2021, 2022
Thomasville National Bank	\$1,500,000,000	560 hours	147	1.3	4	2020, 2021, 2022
United Fidelity Bank, F.S.B.	\$5,700,000,000	1,167 hours	297	1.3	23	2020, 2021, 2022
Home Federal Bank	\$ 654,600,000	307 hours	76	2.0	11	2021, 2022
First National Bank of Sonora	\$ 571,000,000	256 hours	103	0.8	8	2020, 2021, 2022
First Federal Community Bank, NA	\$ 681,500,000	2,797 hours	94	9.9	8	2020, 2021, 2022
American Commercial Bank & Trust, NA	\$1,500,000,000	338 hours	153	1.1	11	2020, 2021
Falcon National Bank	\$ 869,000,000	2,703 hours	131	6.9	6	2020, 2021, 2022
PyraMax Bank, FSB	\$ 541,000,000	Not Reported	88	NA	6	2020, 2021, 2022
First National Bank of Michigan	\$ 980,700,000	Not Reported	81	NA	7	2020, 2021, 2022
Hometown Bank, NA	\$ 913,000,000	1,970 hours	115	5.7	7	2020, 2021, 2022
City National Bank of Sulphur Springs	\$1,200,000,000	358 hours	241	0.7	17	2022, 2023
Oconee Federal Savings and Loan	\$ 614,000,000	Not Reported	83	NA	9	2021, 2022, 2023
Sterling Federal Bank, F.S.B.	\$ 497,200,000	855 hours	96	3.0	9	2021, 2022, 2023
BankSouth	\$1,100,000,000	3,089 hours	300	3.4	5	2020, 2021, 2022
First National Bank, Fort Pierre SD	\$1,700,000,000	1,438 hours	158	3.0	18	2020, 2021, 2022
Bank of Southern California, NA	\$2,360,000,000	1,911 hours	185	3.4	13	2020, 2021, 2022
National Bank of Blacksburg	\$1,700,000,000	Not Reported	217	NA	27	2020, 2021, 2022
The Security National Bank of Sioux City	\$1,300,000,000	3,805 hours	239	5.3	10	2020, 2021, 2022
RiverWood Bank	\$ 587,000,000	1,796 hours	99	6.0	12	2020, 2021, 2022
Iroquois Federal Savings and Loan	\$ 910,800,000	3,572 hours	113	10.5	8	2020, 2021, 2022
Malaga Bank F.S.B.	\$1,500,000,000	386.4 hours	73	1.8	5	2021, 2022, 2023
Bank of Bridger, NA	\$ 733,900,000	5,142 hours	123	13.9	12	2021, 2022, 2023

APPENDIX B: FFIEC 2024 Census Reports for Miami AA

The Miami AA comprises three Metropolitan Divisions. Listed below are links to the 2024 FFIEC Census Reports with detailed demographic information, by census tract, for each:

- [MD 33124 \(Miami-Miami Beach-Kendall, FL\)](#),
- [MD 22744 \(Fort Lauderdale-Pompano Beach-Deerfield, FL\)](#), and
- [MD 48424 \(West Palm Beach-Boca Raton-Boynton Beach, FL\)](#).