



Community Reinvestment Act

Public File

2024



CRA Public File Index

- Written Comments
- CRA Performance Evaluation
- Office Locations
- List of Branches Opened & Closed
- Deposit Services and Fees and Hours of Operation
- Assessment Areas
- HMDA & CRA Disclosure Statements



Written comments received in
2021, 2022, 2023 YTD April 2024

There were no written comments received



CRA Performance Evaluation

- TIAA, FSB Performance Evaluation – 11-1-2021



Office of the Comptroller of the Currency

Midsized Bank Supervision
400 7th Street SW, Suite 3E-218
Mail Stop 10E-8E-11
Washington, D.C. 20219

January 26, 2022

Board of Directors
TIAA, FSB
301 West Bay St.
Jacksonville, FL 32202


Members of the Board:

This letter summarizes the results of our evaluation of the bank's performance under the Community Reinvestment Act (CRA) dated November 1, 2021. The evaluation covered activities since the bank's last CRA examination dated October 22, 2018.

We assigned an overall "Satisfactory" CRA rating. Please refer to the enclosed Performance Evaluation for a detailed discussion of the bank's CRA performance. The Performance Evaluation is for public disclosure and must be placed in your CRA public file within 30 days of receipt. The bank may place a written response to the Performance Evaluation in the public file.

Please contact National Bank Examiner Kelly Freeman or myself at Kelly.Freeman@occ.treas.gov or William.Russell@occ.treas.gov respectively if you have any questions about this examination.

Sincerely,

William L.
Russell Jr.  Digitally signed by William
L. Russell Jr.
Date: 2022.01.26
11:59:10 -05'00'

William Russell
Assistant Deputy Comptroller
Midsized Bank Supervision

Confidentiality Statement

This document is CONTROLLED UNCLASSIFIED INFORMATION (CUI). It is to be controlled, stored, handled, transmitted, distributed, and disposed of in accordance with 32 CFR 2002, "Controlled Unclassified Information." This information must not be distributed beyond the original addressee(s) without prior authorization of the originator. For more information, visit the National Archives and Records Administration's CUI web page at www.archives.gov/cui. Unauthorized disclosure of the contents of this report, including component and composite ratings, is generally prohibited. Exceptions to the general prohibition on disclosure are described in OCC regulations, 12 CFR 4.37(b)(2). Any other disclosure of this document or its contents without the OCC's prior approval is a violation of 12 CFR 4.37(b) and subject to criminal penalties in 18 USC 641 for conversion of U.S. Government property.



PUBLIC DISCLOSURE

November 1, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

TIAA, FSB
Charter Number: 715115

301 West Bay St.
Jacksonville, FL 32202

Office of the Comptroller of the Currency

400 7th Street SW
Washington, D.C. 20219

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

Table of Contents

Overall CRA Rating.....3
Description of Institution.....4
Scope of the Evaluation.....7
Discriminatory or Other Illegal Credit Practices Review.....8
State Rating.....10
 State of Florida.....10
Appendix A: Scope of Examination.....A-1
Appendix B: Summary of MMSA and State Ratings.....B-1
Appendix C: Definitions and Common Abbreviations.....C-1
Appendix D: Tables of Performance Data.....D-1

Overall CRA Rating

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

The following table indicates the performance level of TIAA, FSB (TIAA or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	TIAA, FSB Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on good lending activity, excellent geographic distribution, and good distribution of loans among individuals of different income levels and businesses of different sizes. The bank’s community development (CD) loans as well as innovative and flexible lending programs both had a neutral impact on the overall Lending Test.
- The Investment Test rating is based on an overall excellent level of investments. The bank has a significant level of qualified CD investments and grants across the rating areas, statewide, and at the national level.
- The Service Test rating is based on service delivery systems that are reasonably accessible to geographies and individuals of different levels in the Assessment Areas (AAs). The bank is a leader in providing CD services.

Lending in Assessment Area

The bank originated and purchased 6.6 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2018	2,966	7.8	34,928	92.2	37,894	684,590	6.6	9,698,985	93.4	10,383,574
2019	1,690	4.8	33,767	95.2	35,457	427,409	4.1	10,038,182	95.9	10,465,590
2020	1,221	6.5	17,463	93.5	18,684	324,931	4.6	6,757,165	95.4	7,082,096
Subtotal	5,877	6.4	86,158	93.6	92,035	1,436,930	5.1	26,494,331	94.9	27,931,261
Small Business										
2018	55	19.9	221	80.1	276	2,960	50.3	2,920	49.7	5,880
2019	58	19.9	234	80.1	292	4,425	51.1	4,242	48.9	8,667
2020	135	25.2	401	74.8	536	7,466	46.2	8,678	53.8	16,144
Subtotal	248	22.5	856	77.5	1,104	14,851	48.4	15,840	51.6	30,691
Small Farm										
2020	0	0.0	1	100.0	1	0	0.0	21	100.0	21
Subtotal	0	0.0	1	100.0	1	0	0.0	21	100.0	21
Total	6,125	6.6	87,015	93.4	93,140	1,451,781	5.2	26,510,192	94.8	27,961,973
<i>Source: Bank Data</i>										
<i>Due to rounding, totals may not equal 100.0%</i>										

For the combined three-year evaluation period, TIAA originated a majority of its loan products outside its AAs (93.4 percent). The bank's national mortgage lending strategy reduces the percentage of originated and purchased loans inside the bank's AAs. Loan originations and purchases inside the bank's AA represented 6.6 percent of total loan originations and purchases. Mortgage loans represent 98.8 percent of the total number of loan originations and purchases with 6.4 percent of mortgage loan originations and purchases inside the AAs. Small loans to businesses represented 1.2 percent of the total number of loan originations with 22.5 percent of small business loan originations inside the AAs. Mortgage loan originations and purchases inside the AAs of 6.4 percent, at this evaluation, was consistent with the prior period evaluation loan originations and purchases inside the AA of 6.4 percent. Small loans to business originations inside the AAs of 22.5 percent at this evaluation is an increase since the prior period evaluation of small loans to business originations inside the AA of 6.5 percent.

Description of Institution

TIAA is a federal savings bank headquartered in Jacksonville, Florida. TIAA is an indirect, wholly-owned subsidiary of Teachers Insurance and Annuity Association of America (TIAA of America) that is headquartered in New York, New York. The bank's parent company, TIAA of America, is comprised of several distinct corporate entities that offer retirement, investment, and advisory services, with total assets under management of \$1 trillion.

In June 2017, TIAA of America acquired EverBank Financial Corporation (EFC) and its subsidiaries that resulted in TIAA-College Retirement Equity Funds (CREF) Trust Company, FSB. TIAA-CREF

Trust Company, FSB then merged into EverBank, EFC's federal savings subsidiary. EverBank, the surviving legal entity then changed its name to TIAA, FSB.

As of December 31, 2020, TIAA reported total assets of \$41.4 billion, gross loans of \$34.8 billion, and tier 1 capital of \$3.2 billion. The bank's loan portfolio consisted of 45.6 percent 1-4 family residential loans, 29.7 percent in loans to non-depository financial institutions, 13.2 percent in commercial real estate loans (construction and development, multi-family, and non-farm non residential), 2.9 percent in commercial and industrial loans, and 8.6 percent in other loans.

TIAA gathers deposits through its internet banking operation (internet deposits) and its 10 Florida branches that are located in seven counties. According to the June 30, 2020 Summary of Deposits report, TIAA reported total deposits of \$31.7 billion. Of the total deposits, \$26.4 billion are internet deposits assigned to the Jacksonville MSA and \$5.3 million are branch deposits. Internet deposits were deducted from the Jacksonville MSA when analyzing the bank's deposits.

TIAA markets and distributes its banking products and services primarily through its integrated online and mobile financial portal, its financial centers located in targeted Florida markets, and other national business relationships. TIAA's nationwide consumer and commercial lending businesses target clients through retail and commercial lending offices in major metropolitan markets throughout the country. TIAA also provides trust and investment management services nationwide to TIAA of America's participants and their families, to individuals and institutions in the educational, medical, cultural and research professions, and others.

TIAA offers a full suite of banking products and services, including fiduciary services, to existing banking clients and prospects and TIAA of America's existing individual and institutional customers and delivers banking products through expanded distribution channels. TIAA operates through three business lines: Consumer Banking, Commercial Banking (both located in Jacksonville, Florida), and Trust Services (located in St. Louis, Missouri). The Consumer Banking business offers consumer products, including deposit services, consumer loans (including credit cards), residential lending and loan servicing, and mortgage warehouse lending. The Commercial Banking business offers business clients deposit services, commercial real estate lending, lender finance, equipment finance, and leasing. The Trust Services business offers investment management, fiduciary, and custody services to individual and institutional clients.

Branch hours are 9:00 am to 4:00 pm (with five branches located in Duval County closing at 4:30 pm) Monday through Thursday and on Fridays, 9:00 am – 5:00 pm for all 10 branch locations. Seven of the 10 branches also have drive-thru hours beginning at 8:00 am, 8:30 am, or 9:00 am to 4:30 pm Monday through Thursday and same opening hours with end time of 5:00 pm on Fridays. Additionally, seven of the 10 branches have automated teller machines (ATMs).

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs of both consumers and small business owners.

TIAA participates in a number of affordable lending programs, leveraging its lending expertise to develop and implement loan programs that have a significant beneficial impact on LMI individuals and families. The variety of programs provided by the bank involve multiple sources of financing that

accommodate home purchases and refinancing. Some of the programs offered by the bank's Florida footprint are described below.

TIAA Affordable Mortgage Loan Program

Program provides 97 percent financing with allowable second liens up to 105 percent cumulative loan-to-value (LTV) with no mortgage insurance. Available in TIAA's assessment areas. The bank originated one loan totaling \$147,000 with this program.

Fannie Mae HomeReady® Program

Program is designed for creditworthy low- and moderate-income (LMI) borrowers requesting a purchase money or rate/term refinance mortgage loan with innovative underwriting flexibilities. HomeReady allows for a down payment of just 3 percent on a home and permits the "income pooling" for all members of a household. HomeReady® refinance loans allow up to 97 percent LTV. Borrowers do not need to be first-time homebuyers and have access to a complete mix of fixed-rate products including 25-year and 30-year fixed-rate mortgages. The bank originated 174 loans totaling \$35 million with this program. Majority of the loans (114) were originated outside of the Florida AAs.

Federal Home Loan Bank (FHLB) of Atlanta Affordable Housing Competitive Program

As a FHLB member, TIAA assists non-profit organizations seeking affordable housing funds under the FHLB Affordable Housing Program when funds are available from FHLB. The Affordable Housing Program provides direct subsidy funds or 51 subsidized advances to members for the financing of rental and for-sale housing for very low-, low-, and moderate-income individuals and families. The bank originated 26 loans totaling \$215,000 with this program.

Florida Housing Finance Corporation (FHFC)/Florida Bond Program

The FHFC was created by the Florida State Legislature 35 years ago to assist in providing a range of affordable housing opportunities for residents of Florida. TIAA offers Federal Housing Administration and conventional first lien mortgage loan products through this program. The bank originated 99 loans totaling \$14 million with this program.

Florida Housing Second Mortgage Program

TIAA offers this second mortgage loan program which provides up to \$7,500 in down payment and closing cost assistance for borrowers that meet the income and program qualifications. The bank originated 98 loans totaling \$885,000 with this program.

Freddie Mac Home Possible Program

TIAA offers this mortgage program designed to attract LMI borrowers, first-time homebuyers, and underserved communities. Freddie Mac supports communities across the nation by providing mortgage capital to lenders and offering affordable lending programs. The bank originated 23 loans totaling \$5 million with this program. Majority of the loans (17) were originated outside of the Florida AAs.

Habitat for Humanity of Greater Miami Loan Origination Program

This loan program provides loans at 0 percent interest rate to qualified (income limits) first-time homebuyers in Miami-Dade County. The bank originated 83 loans totaling \$14 million with this program.

Habitat for Humanity of Jacksonville (HabiJAX) Loan Origination Program

This loan program provides loans at 0 percent interest rate to qualified (income limits) first-time homebuyers in Duval County. The bank originated 72 loans totaling \$8 million with this program.

Veterans Administration (VA) Lending Programs

TIAA offers purchase transactions, VA Interest Rate Reduction Refinances, and Streamline Refinances. The VA helps servicemembers, veterans, and eligible surviving spouses to become homeowners. The VA provides a home loan guaranty benefit and other housing-related programs. The bank originated 753 loans totaling \$256 million with this program. Majority of the loans (513) were originated outside of the Florida AAs.

There were no legal or financial factors impeding the bank's ability to help meet credit needs in the AAs during the evaluation period. TIAA's CRA performance was rated "Satisfactory" in the previous performance evaluation dated October 22, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation (PE) assesses the bank's performance under the large bank Lending, Investment, and Service Tests. The evaluation period for the Lending, Investment, Service Tests, and CD activity evaluation period is January 1, 2018 through December 31, 2020. For the Lending Test, we analyzed mortgage loans the bank reported under the Home Mortgage Disclosure Act (HMDA) and small loans made to businesses the bank reported under the Community Reinvestment Act (CRA) as these loans were considered primary loan products.

For purposes of this evaluation, at least 20 originated and purchased loans within an AA during the evaluation period are needed for a meaningful analysis. Based on the volume of lending activity, mortgage and small business loans made to businesses are the bank's primarily lending products. The bank did not originate or purchase a sufficient volume of multifamily loans or small farm loans in an AA to perform a meaningful analysis. In our evaluation of the Lending Test, we considered and concluded upon mortgage loans (includes home purchase, home refinance, and home improvement loans) and business loans in aggregate. Multifamily loans meeting the CD definition were considered as part of the evaluation of CD lending. Additionally, the bank's Innovative and Flexible programs were considered and had a neutral impact on the overall Lending Test rating. Performance Tables O, P, Q, and R in Appendix D include data covered by the analysis period 2018 through 2020.

Bank and deposit data are as of June 30, 2020, based on information from the FDIC. The distribution of bank branches is compared to 2015 U.S. Census American Community Survey (ACS) population estimates.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA

AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full or limited-scope.

Refer to the “Scope” section under the State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is a blend of the state rating based on the results in those areas that received full-scope reviews.

The state rating is based on performance in all bank AAs. Refer to the “Scope” section under the State of Florida Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

When evaluating the bank’s performance, we placed more weight on the full-scope area of Jacksonville MSA based on its deposit, lending volume, and branch percentage representation. For the lending test, we gave greater weight to home mortgage loans than the distribution of small loans to businesses as this product represented 86.6 percent of total loan originations and purchases. No consideration was given to small farm loans because it is not a primary lending product. The bank only made one small farm loan during the evaluation period.

Affordability Analysis – We conducted an affordability analysis for all full-scope AAs. Our goal was to determine if either low- or moderate-income borrowers could reasonably afford a home mortgage loan in their respective AA. To determine affordability, we used the median housing value and the adjusted median family income found in the respective Table A, for each AA. We calculated a payment based on a 5 percent mortgage interest rate, with a 30-year loan amortization. Our analysis concluded that home mortgages were unaffordable if the principal and interest payment exceeded 30 percent of the calculated AA debt-to-income ratio.

This information was used as performance context in the borrower distribution of home mortgage loans when determined to be relevant. See individual AA demographic information relating to our determination of affordability.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §2517, in determining a national bank’s or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable. There have not been any Fair Lending concerns identified during the evaluation period.

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

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

State Rating

State of Florida

CRA rating for the State of Florida: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the AA's credit needs.
- The bank exhibits an excellent geographic distribution of loans in its AAs.
- The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- The bank's low level of CD loans, which had a neutral impact on the overall lending test.
- The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.
- Service delivery systems are readily accessible to geographies and individuals of different income levels in the AAs.
- The bank is a leader in providing CD services.

Description of Institution's Operations in Florida

All TIAA's activities are within the state of Florida and consist of four AAs. These AAs include the Cape Coral-Fort Myers-Naples CSA, Jacksonville MSA, Miami-Port St. Lucie-Fort Lauderdale CSA, and the Tampa-St. Petersburg-Clearwater CSA. The Cape Coral-Fort Myers-Naples CSA is comprised of the whole counties of Lee County and Collier County. The Jacksonville MSA is comprised of the whole county of Duval. The Miami-Port St. Lucie-Fort Lauderdale CSA is comprised of the whole counties of Broward, Miami-Dade, and Palm Beach. The Tampa-St. Petersburg-Clearwater MSA is comprised of the whole county of Pinellas.

In this evaluation, the Cape Coral-Fort Myers-Naples CSA and the Jacksonville MSA will receive full-scope reviews based on deposit and loan volumes and number of branch locations. The Miami-Port St. Lucie-Ft. Lauderdale CSA and the Tampa-St. Peterburg-Clearwater MSAs will receive limited-scope reviews.

TIAA operates 10 branches in its AAs: two branches in the Cape Coral-Fort Myers-Naples CSA, four branches in the Jacksonville MSA, three branches in the Miami-Port St. Lucie-Fort Lauderdale CSA, and one branch in the Tampa-St. Petersburg-Clearwater MSA.

Cape Coral-Fort Myers-Naples CSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cape Coral-Fort Myers-Naples CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	241	5.4	23.7	35.7	34.0	1.2
Population by Geography	1,004,766	5.5	25.9	40.8	27.8	0.0
Housing Units by Geography	575,915	3.5	20.2	39.9	36.3	0.0
Owner-Occupied Units by Geography	267,895	2.1	17.8	43.2	36.9	0.0
Occupied Rental Units by Geography	114,280	8.8	31.4	37.9	21.8	0.0
Vacant Units by Geography	193,740	2.3	17.0	36.4	44.2	0.0
Businesses by Geography	160,146	2.7	19.1	39.4	38.7	0.1
Farms by Geography	4,471	3.9	24.2	45.4	26.5	0.0
Family Distribution by Income Level	253,300	20.8	18.2	19.5	41.5	0.0
Household Distribution by Income Level	382,175	22.5	17.2	18.7	41.7	0.0
Median Family Income MSA - 15980 Cape Coral-Fort Myers, FL MSA		\$57,627	Median Housing Value			\$246,568
Median Family Income MSA - 34940 Naples-Marco Island, FL MSA		\$66,264	Median Gross Rent			\$1,007
			Families Below Poverty Level			10.4%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Cape Coral-Fort Myers-Naples CSA is comprised of the whole counties of Lee and Collier. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2010 U.S. Census data, the AA consists of 241 census tracks (CT), of which 13 are low-income, 57 are moderate-income, 86 are middle-income, 82 are upper-income, and three have not been assigned an income classification. The percentage of households living below the poverty level is 12.3 percent. Strong competition for financial services exists within TIAA's AA, which includes mortgage lenders, nationwide, and regional institutions.

The bank made 14.9 percent of its loan originations and purchases in the AA compared to total bank loans during the evaluation period.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2020, the unemployment rate in Lee County in the Cape Coral-Fort Myers-Naples CSA was 5.4 percent, which was lower than the national average of 6.7 percent. Collier County in the Cape Coral-Fort Myers-Naples CSA was 4.8 percent, which was also lower than the national average of 6.7 percent.

The top mortgage lender in the Cape Coral-Fort Myers-Naples CSA AA is Quicken Loans, LLC with 7.4 percent market share followed by Wells Fargo Bank with 4.6 percent market share and Cross Country Mortgage, LLC with 3.8 percent market share. The bank is ranked 67th among 841 lenders with 0.3 percent market share.

In small loans to businesses, the bank is ranked 61st among 158 lenders with 0.04 percent market share. The top three small business lenders were American Express National Bank with 20.8 percent market share, JP Morgan Chase Bank, NA with 13.6 percent market share, and Bank of America, NA with 11.4 percent market share.

Several of the major employers in Collier County consist of NCH Healthcare System, Collier County School District, and Collier County local government. Several of the major large employers in Lee County include Lee Memorial Health System, Lee County School District, and Publix Super Markets, Inc.

Housing affordability is a challenge in Lee County. The FFIEC estimated 2020 median family income for Lee County was \$68,700. The median housing value was \$310,000 in January 2018 and \$324,995 in December 2020, a 4.8 percent increase, according to Realtor.com. The 2020 housing value would require a mortgage payment of \$1,745 based on a 30-year mortgage with a 5 percent interest rate. Based on this data and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$34,350 per year (or less than 50 percent of the 2020 FFIEC adjusted median family income in the AA) could afford a mortgage payment of \$859 per month. A moderate-income borrower making \$54,960 per year (or less than 80 percent of the 2020 FFIEC adjusted median family income in the AA) could afford a mortgage payment of \$1,374 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in Lee County in this AA.

Housing affordability is a challenge in Collier County. The FFIEC estimated 2020 median family income for Collier County was \$82,300. The median housing value was \$481,200 in January 2018 and \$499,450 in December 2020, a 3.8 percent increase, according to Realtor.com. The 2020 housing value would require a mortgage payment of \$2,681 based on a 30-year mortgage with a 5 percent interest rate. Based on this data and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$41,150 per year (or less than 50 percent of the 2020 FFIEC adjusted median family income in the AA) could afford a mortgage payment of \$1,029 per month. A moderate-income borrower making \$65,840 per year (or less than 80 percent of the 2020 FFIEC adjusted median family income in the AA) could afford a mortgage payment of \$1,646 per month. This illustrates that low- and moderate-income borrowers would be challenged to qualify for a mortgage loan in Collier County in this AA.

There were two community contacts to two groups working in the AA - an affordable housing organization and an economic development organization. The contacts reported the following needs within the AA:

- Affordable housing
- Financial Literacy
- Small business lending

Jacksonville MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Jacksonville MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	174	11.5	30.5	33.9	23.6	0.6
Population by Geography	890,673	8.1	28.1	39.4	24.4	0.0
Housing Units by Geography	393,571	9.1	28.3	37.4	25.2	0.0
Owner-Occupied Units by Geography	200,029	5.8	23.6	39.8	30.8	0.0
Occupied Rental Units by Geography	137,871	11.0	33.9	36.1	19.0	0.0
Vacant Units by Geography	55,671	16.1	31.3	31.7	20.9	0.0
Businesses by Geography	118,979	6.1	25.0	33.5	35.4	0.0
Farms by Geography	2,541	5.3	24.1	39.9	30.7	0.0
Family Distribution by Income Level	209,958	25.1	18.1	19.7	37.2	0.0
Household Distribution by Income Level	337,900	26.4	17.6	17.5	38.5	0.0
Median Family Income MSA - 27260 Jacksonville, FL MSA		\$64,042	Median Housing Value			\$151,543
			Median Gross Rent			\$954
			Families Below Poverty Level			13.4%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Jacksonville MSA consists of Duval County. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2010 U.S. Census data, the AA consists of 174 CTs, of which 20 are low-income, 53 are moderate-income, 59 are middle-income, 41 are upper-income, and one has not been assigned an income classification. The percentage of households living below the poverty level is 15.7 percent. Strong competition for financial services exists within TIAA's AA, which includes mortgage lenders, nationwide, and regional institutions.

The bank made 33.7 percent of its loan originations and purchases in the AA compared to total bank loans during the evaluation period.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2020, the unemployment rate in the Jacksonville MSA was 4.9 percent, which was lower than the national average of 6.7 percent.

The top mortgage lender in the Jacksonville MSA is Quicken Loans, LLC with 6.5 percent market share followed by US Bank with 5.3 percent market share and Vystar with 4.7 percent market share. The bank is ranked 31st among 505 lenders with 0.9 percent market share.

In small loans to businesses, the bank is ranked 50th among 111 lenders with 0.1 percent market share. The top three small business lenders were American Express National Bank with 23.5 percent market

share, JP Morgan Chase Bank, NA with 12.2 percent market share, and Bank of America, NA with 11.4 percent market share.

Several of the major employers consist of Baptist Health, Bank of America, NA, and Mayo Clinic. Other large employers include Southeastern Grocers, Florida Blue, and Ascension St. Vincent's.

Housing affordability is a challenge in the Jacksonville MSA. The FFIEC estimated 2020 median family income was \$74,800. The median housing value was \$313,445 in January 2018 and \$318,000 in December 2020, a 1.5 percent increase, according to Realtor.com. The 2020 housing value would require a mortgage payment of \$1,707 based on a 30-year mortgage with a 5 percent interest rate. Based on this data and not accounting for down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$37,400 per year (or less than 50 percent of the 2020 FFIEC adjusted median family income in the AA) could afford a mortgage payment of \$935 per month. A moderate-income borrower making \$59,840 per year (or less than 80 percent of the 2020 FFIEC adjusted median family income in the AA) could afford a mortgage payment of \$1,496 per month. This illustrates that low and moderate-income borrowers would be challenged to qualify for a mortgage loan in the AA.

The community contacts made in the AA, included a community needs call to four groups working in the AA that consisted of three community organizations and an economic development organization. The contacts reported the following needs within the AA:

- Affordable housing preservation and development
- Addressing homelessness
- Rental and eviction assistance

Scope of Evaluation in Florida

For the state of Florida, we completed full-scope reviews of the Cape Coral-Fort Myers-Naples CSA and Jacksonville MSA. Ratings are based primarily on results of the full-scope areas. The Cape Coral-Fort Myers-Naples CSA was chosen for a full-scope review as it has not been previously reviewed and this CSA's percentage of deposits was similar to the Miami-Port St. Lucie-Fort Lauderdale CSA deposits. The Jacksonville MSA was chosen for a full-scope review as it houses the bank's largest market in the rating area for deposits and second largest for loan activities. The Cape Coral-Fort Myers-Naples CSA and the Jacksonville MSA represent 93 percent of the rating area deposits, 66.7 percent of rating area offices, and 48.6 percent of rating area loans. These factors indicate the bank is important to the AAs.

As previously discussed, we placed more weight on the full-scope area of Jacksonville MSA based on its deposit and branch percentage representation. For the lending test, we gave more weight to home mortgage loans as this product represented 98.8 percent of total loan originations and purchases.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Cape Coral-Fort Myers-Naples CSA full-scope AA is adequate and in the Jacksonville MSA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank's lending capacity, based on deposits, competition, and market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Cape Coral-Ft. Myers-Naples CSA	847	64	0	2	913	14.9	4.2
Jacksonville MSA	1,947	119	0	13	2,079	33.8	88.8
Miami-Port St Lucie -Ft Lauderdale CSA	2,717	53	0	7	2,774	45.1	4.8
Tampa-St Peterburg-Clearwater MSA	366	12	0	4	382	6.2	2.2

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000s)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State * Loans	%State Deposits
Cape Coral-Ft. Myers-Naples CSA	254,912	753	0	10,050	265,715	17.2	4.2
Jacksonville MSA	356,583	8,104	0	45,994	410,681	26.7	88.8
Miami-Port St Lucie -Ft Lauderdale CSA	735,411	4,991	0	19,000	759,402	49.3	4.8
Tampa-St Peterburg-Clearwater MSA	90,024	1,003	0	14,050	105,077	6.8	2.2

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Cape Coral-Fort Myers-Naples CSA

The following factors support the bank's adequate responsiveness to community credit needs:

- TIAA's deposit market share of 3.7 percent represents the 9th highest deposit market share of the 39 banks in the CSA with Bank of America, NA leading in deposits at 14.24 percent followed by Wells Fargo at 13.69 percent.
- Mortgage lending competition is significant, with 1,160 competitors in the market. The bank ranks 67th in the market amongst the competition.
- Small business lending competition is also significant in the market, with 171 small business lenders.
- The bank's market share for deposits is 3.66 percent and mortgage market share of 0.25 percent.
- The principal business strategy of the bank is to focus on the origination and purchase of residential mortgage loans nationwide.
- Small business lending is not a focal point in the bank's business strategy and the bank does not actively market small business loans as a core product.

Jacksonville MSA

The following factors support the bank's good responsiveness to community credit needs:

- TIAA has the 2nd highest deposit market share in the Jacksonville MSA, which represents a very high presence in the market relative to some of its competitors at 32.9 percent. The bank's market presence is significant considering it competes with Bank of America, NA at 48.9 percent market share and tops Wells Fargo Bank, NA 5.7 percent market share.
- Internet deposits totaling \$26.4 billion originated through financial centers (non-branches) are assigned to Duval County, which is located within the MSA. Internet deposits were deducted from the Jacksonville MSA when analyzing the bank's deposits.
- Mortgage lending competition is significant in the Jacksonville MSA with 668 competitors in the market.
- Small business lending competition is significant in the MSA with 115 lenders.
- The bank's market share for deposits is 32.9 percent and mortgage market share is 0.91 percent.
- The principal business strategy of the bank is to focus on the origination and purchase of residential mortgage loans nationwide.
- Small business lending is not a focal point in the bank's business strategy and the bank does not actively market small business loans as a core product.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AAs.

Home Mortgage Loans

Refer to Table O in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan origination and purchases for the evaluation period is excellent. The following information was taken into consideration when determining the rating.

Cape Coral-Fort Myers-Naples CSA

- TIAA home mortgage lending challenges in the AA are due to very strong competition in the CSA with 1,160 lenders and a limited supply of owner-occupied housing units in low- and moderate-income CTs, at 2.1 percent and 17.8 percent, respectively. The bank's mortgage lending in this CSA represents 14.4 percent of the bank's overall mortgage lending.
- The bank's level of lending in low-income geographies was below the proportion of owner-occupied housing units and slightly exceeds the aggregate distribution of lending in those CTs. The proportion of the bank's mortgage lending in moderate-income geographies significantly exceeds both the proportion of owner-occupied housing units and the aggregate distribution of lending in those geographies.

Jacksonville MSA

- TIAA home mortgage lending challenges in the AA are due to very strong competition with 668 mortgage lenders and a very low percentage of owner-occupied housing units in low-income CTs. Only 5.8 percent of all owner-occupied housing units are in low-income CTs.
- The bank's level of lending in low-income geographies significantly exceeds both the proportion of owner-occupied housing units and the aggregate distribution of lending in those CTs. The proportion of the bank's mortgage lending in moderate-income geographies was slightly below the proportion of owner-occupied housing units and exceeds the aggregate distribution of lending in those geographies.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is good. The following information was taken into consideration when determining this rating.

Cape Coral-Fort Myers-Naples CSA

- TIAA and other small business lenders are challenged by strong competition in the CSA with 171 lenders and a low percentage of small businesses in the low- and moderate-income CTs within the CSA at 2.7 percent and 19.1 percent, respectively
- TIAA's level of small loans to businesses in low-income CTs is well below both the proportion of small businesses and the aggregate distribution of lending in those tracts with no loan originations. The bank's lending in moderate-income tracts is below the proportion of small businesses and the aggregate distribution of lending in those tracts.

Jacksonville MSA

- TIAA is challenged with strong competition in the MSA with 115 small business lenders and a low percentage of small businesses in low-income CTs within the AA (6.6 percent of the small businesses in the AA are in low-income CTs).
- TIAA's level of small loans to businesses in low-income CTs significantly exceeds both the proportion of small businesses and aggregate distribution of lending in those CTs. The bank's lending in moderate-income CTs is below both the proportion of small businesses and aggregate distribution of lending in those CTs.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activities to identify any gaps in the geographic distribution of loans in all full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

Cape Coral-Fort Myers-Naples CSA

- A low percentage of households in the CSA are low- and moderate-income with 22.5 percent classified as low-income and 17.2 percent classified as moderate-income. In addition, 10.4 percent of the families have income below the poverty line and 1.5 percent of the households receive some form of public assistance in low- and moderate-income CTs.

- The proportion of bank loans to low-income borrowers was below the percentage of low-income families. The proportion of bank loans to moderate income borrowers was below the percentage of moderate-income families. The bank’s lending to low-income borrowers is below the lending conducted by its competitors. The bank’s lending to moderate income borrowers was below the lending conducted by its competitors.
- Competition is very strong for mortgage loans with 1,160 mortgage lenders in the AA.

Jacksonville MSA

- Homeownership rates in Florida are below average. In the Jacksonville MSA, 25.1 percent of families are low-income borrowers and 18.1 percent are moderate-income borrowers.
- A significant percent of the households in the MSA are LMI with 26.4 percent classified as low-income and 17.6 percent classified as moderate-income. In addition, 13.4 percent of the population has income below the poverty line and 2.9 percent of the population receives some form of public assistance.
- Competition is strong for mortgage loans with 668 mortgage lenders in the AA.
- The proportion of bank loans to low-income borrowers was below the percentage of low-income families. The proportion of bank loans to moderate-income borrowers was below the percentage of moderate-income families. The bank’s lending to low-income borrowers is above the lending conducted by its competitors. The bank’s lending to moderate-income borrowers was slightly below the lending conducted by its competitors.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the distribution of the bank’s originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

Cape Coral-Fort Myers-Naples CSA

- The proportion of the bank’s loans to businesses with revenues of \$1.0 million or less was below the proportion of those businesses in the AA, but slightly exceeds the aggregate distribution of small business loans.
- Competition for the CSA has 171 lenders originating small business loans, representing strong competition for small business loans.

Jacksonville MSA

- The MSA has 115 lenders originating small business loans, representing strong competition for small business loans.

- The proportion of the bank's loans to businesses with revenues of \$1.0 million or less was below the proportion of those businesses in the AA but exceeds the aggregate distribution of small business loans.

Community Development Lending

The institution has made a low level of CD loans. CD loans had a neutral impact on the overall Lending Test rating.

The Lending Activity Tables, shown on page 14, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Cape Coral-Fort Myers-Naples CSA

The bank has made a low level of CD loans. During the evaluation period, the bank originated two CD loans totaling \$10 million in the Cape Coral-Fort Myers-Naples CSA representing 1.2 percent of allocated tier 1 capital. CD loans exhibited a low-level responsiveness to the credit and community needs in the AA. The loans primarily supported affordable housing.

Examples of CD loans originated during the evaluation period include:

- A \$7.1 million loan to a multifamily complex located in a low-income CT and rents units to LMI families.
- A \$3.0 million loan to an apartment complex located in a low-income CT and rents units to LMI families.

Jacksonville MSA

The bank has made an adequate level of CD loans. During the evaluation period, the bank originated 13 CD loans totaling \$46 million in the Jacksonville MSA representing 4.3 percent of allocated tier 1 capital. CD loans exhibited an adequate responsiveness to the credit and community needs in the AA. The loans primarily support affordable housing.

Examples of CD loans originated during the evaluation period include:

- A \$16.4 million Low Income Housing Tax Credit (LIHTC) loan to finance the construction and development of a four-story mixed use facility with rent restrictions consisting of 117 multifamily units.
- A \$5.0 million loan to fund a CD facility that also supports loan guarantees.
- A \$4.0 million revolving line of credit to finance affordable homes for LMI clients.

Statewide

In the Statewide area, the bank originated four CD loans totaling \$60 million. The largest exposure is a warehouse line to a tribally-owned enterprise in the amount of \$50 million. The dollar amount of the warehouse line is split evenly amongst the bank's seven counties. The tribally-owned enterprise has a goal to diversify the tribe's business interests by increasing nationwide affordable and sustainable homeownership opportunities for all LMI individuals.

Outside AA

The bank originated a CD loan totaling \$1.5 million through the Small Business Administration Paycheck Protection Program to provide emergency assistance for a TIAA deposit customer with the purpose of assisting a LMI small business owner and support affordable housing.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs of both consumers and small business owners. All the bank's programs are detailed in Description of Institution section of this report. Innovation and Flexibility programs had a neutral impact on full-scope rating areas. Highlights of program participation in the full-scope AAs are described below.

Cape Coral-Fort Myers-Naples CSA

VA Lending Programs

The bank originated three loans totaling \$1.1 million with this program.

Fannie Mae HomeReady® Program

The bank originated four loans totaling \$700,000 with this program.

FHFC/Florida Bond Program

The bank originated one loan totaling \$155,000 with this program.

Florida Housing Second Mortgage Program

The bank originated one loan totaling \$8,000 with this program.

Jacksonville MSA

VA Lending Programs

The bank originated 68 loans totaling \$17.4 million with this program.

Fannie Mae HomeReady® Program

The bank originated 28 loans totaling \$4 million with this program.

Freddie Mac Home Possible Program

The bank originated four loans totaling \$816,000 with this program.

FHFC/Florida Bond Program

The bank originated 75 loans totaling \$10.5 million with this program.

Florida Housing Second Mortgage Program

The bank originated 74 loans totaling \$690,000 with this program.

FHLB of Atlanta – Affordable Housing Competitive Program

The bank originated 24 loans totaling \$206,000 with this program.

Habitat of Humanity of Jacksonville (CT) Loan Origination Program

The bank originated 72 loans totaling \$7.6 million with this program.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Lending Test in Miami-Port St. Lucie-Fort Lauderdale CSA and Tampa-St. Petersburg-Clearwater MSA is consistent with the bank’s overall High Satisfactory performance under the Lending Test in the full-scope areas.

Refer to Tables O through R in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in Florida is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Cape Coral-Fort Myers-Naples CSA is adequate and the performance in the Jacksonville MSA is excellent.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The institution makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Scope:										
Cape Coral-Fort Myers-Naples CSA	4	8,979	49	5,806	53	14.8	14,785	7.3	-	-
Jacksonville MSA	14	40,793	143	35,180	157	44.0	75,973	37.8	-	-
Limited Scope:										
Miami-Port St. Lucie-Fort Lauderdale CSA	16	51,524	100	34,201	116	32.5	85,725	42.6	-	-
Tampa-St. Petersburg-Clearwater MSA	3	7,798	28	16,887	31	8.7	24,685	12.3	-	-
TOTAL:	37	109,094	320	92,074	357	100.0	201,168	1000	-	-

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

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

Cape Coral-Fort Myers-Naples CSA

Performance in the AA is adequate. Qualified investments totaling \$14.8 million consist of \$3.2 million in current period investments, \$2.6 million in donations, and \$9 million in prior period investments. Total investments represent 1.8 percent of allocated tier 1 capital.

Current period investments consist of one \$3.2 million multifamily affordable housing project located in Collier County. Donations consist of 15 grants totaling \$358,000 made to nonprofit affordable housing organizations, two economic development initiatives totaling \$8,000, and 31 community services donations totaling \$2.2 million to nonprofit organization located in the CSA. Prior period investments consist of three affordable housing mortgage backed securities totaling \$5.6 million and one revitalization and stabilization project totaling \$3.4 million.

Examples of qualified Investments in this AA include:

- A \$3.2 million private equity fund of a \$10 million bank-wide investment. The fund acquires workforce and affordable housing projects targeting LMI individuals or LMI geographies residing in the AA.
- Six grants totaling \$1.8 million to a nonprofit community service organization that provides scholarships for K-12 low-income underprivileged students. The scholarship program enables families to send children to schools where the students can receive a quality education tailored to specific learning needs.
- Grants totaling \$1.5 million to two schools where funds were used for financial literacy materials and other financial support.

Jacksonville MSA

Performance in the Jacksonville MSA is excellent. Qualified investments totaling \$76 million consist of \$31.4 million in current period investments, \$3.8 million in donations, and \$40.8 million in prior period investments. Total investments represent 7.1 percent of allocated tier 1 capital.

Current period investments consist of three affordable multifamily housing projects. Of the 140 donations, 26 or \$885,000 were made to nonprofit affordable housing organizations, 17 or \$12,000 to support economic development initiatives, and 97 or \$2.9 million to community service organizations.

Prior period investments consist of 14 affordable housing mortgage backed securities.

Examples of qualified investments in the AA include:

- An \$18.7 million LIHTC that funded a 117 unit affordable housing multifamily property and an 11,000 square feet commercial retail space.
- Two mortgage backed securities total \$12.7 million secured by two multifamily affordable housing properties for LMI individuals residing in the MSA.
- An \$11.4 million prior period LIHTC that funded an affordable housing multifamily property where the property provides 122 units for LMI residents diagnosed with Intellectual and Developmental Differences.

Statewide AA

In addition to the CD investments that benefited the bank's AAs, TIAA made 19 current period investments totaling \$17.5 million and continue to hold five prior period investments totaling \$11.1 million and one \$5 million commitment benefiting the state of Florida, including one or more of the bank's AAs. Current period investments consist of two private equity funds totaling \$6.8 million secured by multifamily affordable housing projects, one \$10 million economic development investment, and 16 grants totaling \$686,000 made to nonprofit community service organizations. Prior period investments consist of three mortgage-backed securities totaling \$2 million secured by residential affordable housing properties, one economic development investment totaling \$5 million, and one revitalization and stabilization investment totaling \$4.1 million.

Broader Regional

During the evaluation period, TIAA of America, holding company of TIAA, invested in 48 current period investments totaling \$87.4 million and made five commitments totaling \$107.8 million. Highlights of current period investments include 12 investments totaling \$86.6 million consisting of seven mortgage-backed securities totaling \$86.5 million secured by multifamily and residential projects and five donations totaling \$160,000 to support nonprofit organizations with affordable housing initiatives. The five commitments were to Private Equity Funds.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in Miami-Port St. Lucie-Fort Lauderdale CSA and the Tampa-St. Petersburg-Clearwater MSA is consistent with the bank's overall Outstanding rating in the full-scope AAs. Performance in the Miami-Port St. Lucie-Fort Lauderdale CSA totaled \$85.7 million with an investment to allocated tier 1 capital ratio of 9.2 percent. Performance in the Tampa-St. Petersburg-Clearwater MSA totaled \$24.7 million with an investment to allocated tier 1 capital ratio of 34.3 percent.

SERVICE TEST

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

The evaluation of the bank's Service Test performance takes into consideration the impact of the COVID-19 pandemic. Some of the bank's AA markets were in government-mandated lockdowns where residents were required to limit activities outside of the home and businesses reduced operations. This significantly impacted the bank's ability to perform CD services.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Cape-Coral-Fort Myers-Naples CSA and the Jacksonville MSA are adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	Branches						Population			
		# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Scope:											
Cape-Coral-Fort Myers-Naples CSA	4.2	2	20.0	0	0	50.0	50.0	5.5	25.9	40.8	27.8
Jacksonville MSA	88.7	4	40.0	0	0	50.0	50.0	8.1	28.1	39.4	24.4
Limited Scope:											
Miami-Port St. Lucie-Fort Lauderdale CSA	4.8	3	30.0	0	0	0	100.0	5.8	28.9	31.5	33.4
Tampa-St. Petersburg-Clearwater MS	2.2	1	10.0	0	100.0	0	0	3.2	17.4	47.9	31.6

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full Scope:						
Cape-Coral-Fort Myers-Naples CSA	0	0				
Jacksonville MSA	0	0				
Limited Scope:						
Miami-Port St. Lucie-Fort Lauderdale CSA	0	0				
Tampa-St. Petersburg-Clearwater MSA	0	0				

Cape-Coral-Fort Myers-Naples CSA

In the AA, the bank has no branches in low- or moderate-income geographies; this is below the percentage of the population residing in low-income geographies and well below the percentage of the population residing in moderate-income geographies. The bank also has a stand-alone deposit taking ATM that is located in an upper-income geography.

While there are no branches in LMI geographies, there is adequate usage penetration by households in LMI geographies in the AA. Bank-provided data shows that, across the entire AA, there are 301 accounts held by depositors from LMI geographies; this represents 10.8 percent of all AA deposit accounts.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, including deposit-taking ATMs, mobile banking, and online banking. There were no branches closed in the AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Jacksonville MSA

In the AA, the bank has no branches in low- or moderate-income geographies; this is below the percentage of the population residing in low-income geographies and well below the percentage of the population residing in moderate-income geographies.

While there are no branches in LMI geographies, there is adequate usage penetration by households in LMI geographies in the AA. Bank-provided data shows that there are three branches with LMI

geographies adjacent to the branch location. There are 130 accounts held by depositors in these adjacent LMI geographies. Across the entire AA, there are 720 accounts held by depositors from LMI geographies; this represents 15.9 percent of all AA deposit accounts.

The bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, including as deposit-taking ATMs, mobile banking, and online banking. There were no branches closed in the AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

The institution is a leader in providing CD services.

Cape-Coral-Fort Myers-Naples CSA

The bank provides a relatively high level of community development services.

CD services were effective and responsive in helping the bank address community needs in the Cape-Coral-Fort Myers-Naples CSA. During the evaluation period, the bank conducted a good level of CD services consistent with its capacity and expertise to conduct such activities. Bank employees provided 78 hours to four community organizations that serve the CSA. The CD organizations support affordable housing initiatives, community services to LMI families, and economic development for small businesses.

Examples of CD services provided:

- A bank officer served in several committee roles for a community service organization by providing technical assistance to the finance committee and participation on the allocation committee which considers applications for funding to partner organizations serving LMI populations or LMI geographies. Majority of families served by the local organization and partner agencies are LMI.
- A bank officer provided technical assistance to a non-profit organization in developing its application for funding through the FHLB of Atlanta competitive Affordable Housing Program.
- A bank employee taught financial wellness concepts to LMI youth at a local elementary school.

Jacksonville MSA

The bank is a leader in providing CD services in the Jacksonville MSA.

CD services were effective and responsive in helping the bank address community needs in the Jacksonville MSA. During the evaluation period, the bank conducted an excellent level of CD services consistent with its capacity and expertise to conduct such activities. Bank employees provided 3,931 hours to 52 community organizations that serve the MSA. The CD organizations support affordable

housing initiatives, community services to LMI families, and economic development for small businesses.

Examples of CD services provided:

- A bank officer served on the board of a faith-based organization that is developing a plan for affordable housing within the Cathedral District of downtown Jacksonville to support revitalization of the area. The bank officer provided technical expertise on the property acquisition and the project development finance process.
- A bank officer assisted with developing and updating the training materials for a community organization's workforce development program that serves LMI individuals. This activity was in response to a need to assist with replacing an outdated and ineffective program. The new materials will provide career assessments, resume resources, and job search tools. The program will complement other skills training and mock interview programs.
- A bank officer provided technical expertise to a community service organization that provide services to LMI women seeking assistance. The bank officer served as a Board member and provided technology expertise as the organization's IT director to assist in the tracking and reporting of LMI clients and services.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Miami-Port St. Lucie-Fort Lauderdale CSA and in the Tampa-St. Petersburg-Clearwater MSA is weaker than the bank's overall performance under the Service Test in the full-scope areas.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2018 to 12/31/2020	
Bank Products Reviewed:	Home mortgage and small business loans for the period 01/01/18-12/31/20. Community development loans, qualified investments, community development services for the period 01/01/2018-12/31/2020.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA		None
None		
State of Florida		
Cape-Coral-Fort Myers- Naples CSA	Full-Scope	Counties of Lee and Collier
Jacksonville MSA	Full-Scope	Duval County
Miami-Port St. Lucie-Fort Lauderdale CSA	Limited Scope	Counties of Broward, Miami-Dade, and Palm Beach
Tampa-St. Petersburg-Clearwater MSA	Limited Scope	Pinellas County

Appendix B: Summary of MMSA and State Ratings

RATINGS TIAA, FSB				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
TIAA, FSB	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State:				
Florida	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-2020	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Cape Coral-Fort Myers-Naples CSA	847	254,912	14.4	70,571	2.1	1.5	1.4	17.8	24.3	16.5	43.2	39.1	43.4	36.9	34.9	38.6	0.0	0.1	0.1	
Jacksonville MSA	1,947	356,583	33.1	47,983	5.8	10.1	2.4	23.6	22.2	18.8	39.8	31.8	40.5	30.8	35.9	38.3	0.0	0.0	0.0	
Miami-Port St Lucie-Fort Lauderdale CSA	2,717	735,411	46.2	231,840	2.6	3.2	1.9	23.2	27.5	18.0	32.9	32.5	32.7	41.2	36.7	47.1	0.2	0.1	0.3	
Tampa-St Petersburg-Clearwater MSA	366	90,024	6.2	50,827	1.7	2.2	1.7	14.0	17.8	11.6	47.8	44.0	45.1	36.5	36.1	41.6	0.0	0.0	0.0	
Total	5,877	1,436,930	100.0	401,221	2.7	5.2	1.8	21.3	24.7	17.0	36.9	33.9	37.1	39.0	36.1	43.9	0.1	0.1	0.2	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cape Coral-Fort Meyers-Naples CSA	847	254,912	14.4	70,571	20.8	1.9	3.5	18.2	9.6	14.3	19.5	11.1	19.2	41.5	36.1	47.0	0.0	41.7	16.0
Jacksonville MSA	1,947	356,583	33.1	47,983	25.1	8.2	5.8	18.1	16.1	16.5	19.7	13.1	19.4	37.2	26.5	31.7	0.0	36.1	26.5
Miami-Port St Lucie Fort Lauderdale CSA	2,717	735,411	46.2	231,840	23.1	1.8	2.1	17.0	9.1	10.1	17.7	10.5	18.2	42.2	31.2	51.9	0.0	47.5	17.7
Tampa-St Petersburg-Clearwater MSA	366	90,024	6.4	50,827	20.3	4.3	3.7	17.4	8.7	13.9	19.3	11.5	19.0	43.0	33.3	47.3	0.0	44.3	16.1
Total	5,877	1,436,930	100.0	401,221	22.7	3.9	3.0	17.3	11.5	12.1	18.3	11.5	18.6	41.7	30.5	48.0	0.0	42.7	18.3

*Source: 2015 ACS Census ; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2018-2020**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cape Coral-Fort Myers-Naples CSA	64	753	25.8	34,712	2.7	0.0	2.4	19.1	7.8	18.1	39.4	25.0	39.7	38.7	67.2	39.8	0.1	0.0	0.0
Jacksonville MSA	119	8,104	48.0	22,545	6.1	11.8	6.6	25.0	17.6	24.2	33.5	29.4	32.7	35.4	41.2	36.5	0.0	0.0	0.0
Miami-Port St Lucie-Fort Lauderdale CSA	53	4,991	21.4	281,179	4.1	0.0	4.5	21.8	15.1	22.2	28.1	22.6	27.2	44.7	62.3	44.9	1.2	0.0	1.2
Tampa-St Petersburg-Clearwater MSA	12	1,003	4.8	31,205	2.6	0.0	2.9	15.4	0.0	16.3	43.5	33.3	43.3	38.4	66.7	37.5	0.0	0.0	0.0
Total	248	14,851	100.0	369,641	4.0	5.6	4.3	21.2	13.7	21.5	31.0	27.0	30.0	42.9	53.6	43.3	0.9	0.0	0.9

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-2020	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cape Coral-Fort Myers-Naples CSA	64	753	25.8	34,712	92.0	46.9	46.2	2.7	23.4	5.3	29.7	
Jacksonville MSA	119	8,104	48.0	22,545	89.4	52.1	44.4	3.4	13.4	7.2	34.5	
Miami-Port St Lucie-Fort Lauderdale CSA	53	4,991	21.4	281,179	93.0	43.4	48.2	2.7	13.2	4.3	43.4	
Tampa-St Petersburg-Clearwater MSA	12	1,003	4.8	31,205	90.9	66.7	50.6	3.3	25.0	5.8	8.3	
Total	248	14,851	100.0	369,641	92.4	49.6	48.0	2.8	16.5	4.8	33.9	
<i>Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												



Office Locations

Broward County

Coral Ridge Office
2521 E. Commercial Blvd, Ft. Lauderdale, FL 33308
(Coral Ridge) Census Tract "0402.03" – Upper Income Tract

Collier County

Colliers Reserve Office
1185 Immokalee Rd., Naples, FL 34110
Census Tract "0101.08" – Middle Income Tract

Duval County

Riverside Office
501 Riverside Avenue, Jacksonville, FL 32202
Census Tract "0171.00" – Middle Income Tract

ATM Only
301 West Bay Street, Jacksonville, FL 32202
Census Tract "0172.00" – Upper Income Tract
ATM Facility Accepts Cash Deposits

Oceanway Office
104 New Berlin Road, Jacksonville, FL 32218
Census Tract "102.01" – Moderate Income Tract

Mandarin Office
10400-01 San Jose Blvd., Jacksonville, FL 32257
Census Tract "167.11" – Upper Income Tract



Office Locations

Lee County

Daniels Parkway Office
6321 Daniels Pkwy, Fort Myers, FL 33912
Census Tract "0012.02" – Middle Income Tract

Miami-Dade County

Coral Gables Office
20 Giralda Ave., Coral Gables, FL 33134
Census Tract "0062.06" – Upper Income Tract

Palm Beach County

Boca Raton Office
595 S. Federal Highway, Boca Raton, FL 33432
Census Tract "0075.05" – Upper Income Tract

Pinellas County

Clearwater Office
2530 State Road 580, Clearwater, FL 33761
Census Tract "0268.20" – Middle Income Tract



Branches Opened/Closed

2021, 2022, 2023 YTD April 2024

Duval County

Closed	Branch Name	Address	Tract
04/30/2021	Normandy Boulevard	7749 Normandy Boulevard, Jacksonville, FL	0120.00



Deposit Services and Fees And Hours of Operation



<u>Branch Name</u>	<u>Branch Location</u>	<u>Lobby Hours</u>		<u>Drive-Thru Hours</u>		<u>Service</u>
		<u>Mon-Thurs</u>	<u>Friday</u>	<u>Mon-Thurs</u>	<u>Friday</u>	
Duval County						
Riverside	501 Riverside Ave., Jacksonville, FL	9:00 - 4:30	9:00 - 5:00	8:30- 4:30	8:30 5:00	Full w/ ATM
Oceanway	104 New Berlin Rd., Jacksonville, FL	9:00 - 4:30	9:00 - 5:00	8:30- 4:30	8:30 5:00	Full w/ ATM
Mandarin	10400-1 San Jose Blvd., Jacksonville, FL	9:00 - 4:30	9:00 - 5:00	8:30- 4:30	8:30 5:00	Full no ATM
ATM Only	301 West Bay Street, Jacksonville, FL					ATM Only
Southwest						
Colliers Reserve	1185 Immokalee Road, Naples, FL	9:00 - 4:00	9:00 - 5:00	9:00 - 4:00	9:00 5:00	Full w/ ATM
Daniels Parkway	6321 Daniels Parkway, Ft. Myers, FL	9:00 - 4:00	9:00 - 5:00	9:00 - 4:00	9:00 5:00	Full w/ ATM
Southeast						
Coral Ridge	2521 E. Commercial Blvd., Ft. Lauderdale, FL	9:00 - 4:00	9:00 - 5:00			Full w/ ATM
Boca Raton	595 South Federal Hwy., Boca Raton, FL	9:00 - 4:00	9:00 - 5:00			Full no ATM
Coral Gables	20 Giradle Ave., Coral Gables, FL	9:00 - 4:00	9:00 - 5:00	9:00 - 4:00	9:00 - 5:00	Full w/ ATM
Tampa Bay						
Clearwater	2530 State Road 580, Clearwater, FL	9:00 - 4:00	9:00 - 5:00			Full w/ATM

PERSONAL BANKING

Discover your money's real potential



Personal banking solutions that go the extra mile

Easy access to your money. Whenever, wherever.

It's your money. We work hard to make sure you don't have to jump through any hoops to use it. And if you need any help, our support team is here for you.

Nationwide network of fee-free ATMs

Access your cash at fee-free ATMs across the country, many of which are located inside your favorite major retail stores. Plus, if you use an ATM that's not part of the EverBank network, we offer ATM fee reimbursement.¹

- Zero EverBank ATM fees
- 80,000+ fee-free ATMs nationwide
- Unlimited ATM fee reimbursement with balances of \$5K or more¹

Secure web and mobile access

Handle your most frequent banking needs safely and easily, in real time.

- Powerful online banking tools to track and manage all your accounts
- Easily send money to friends and family from your computer or mobile device with Zelle^{®2}
- Secure mobile app for banking on the go
- Safe and strong encryption methods
- Web Safety Guarantee³

Unique solutions for unique goals

Grow your wealth in whole new ways. If the same old doesn't work for you, maybe it's time to break the mold.

CDARS[®] CD

This can be a great option when you need more than the standard FDIC insurance protection.⁴

- Access to FDIC insurance coverage on millions in deposits⁵
- \$10,000 to open
- No monthly account fee
- No setup charges
- 15-day maturity alert



Call 1.877.515.3837 to speak with a Client Solutions Specialist

Or visit everbank.com/banking

Get more bank for your buck

Kick your savings into high gear with our Yield Pledge[®] accounts and start making the most of your money.

Yield Pledge Checking

Find the day-to-day access you need with a high-yield advantage. Earnings stay high thanks to our Yield Pledge promise.

- \$100 to open
- Mobile check deposits⁶
- Convenient account access and payment options with debit cards, checks, free online bill pay and Zelle^{®2}
- No monthly account fee, overdraft fees or EverBank ATM fees
- Unlimited ATM fee reimbursement with balances of \$5K or more¹
- Apple Pay[®], Samsung Pay and Google Pay[™] mobile payments⁷

Yield Pledge Money Market

Keep your money safe and growing with this high-yield account. You'll get a competitive yield on each and every penny you deposit.

- \$0 to open
- Mobile check deposits⁶
- Convenient account access and payment options with debit cards, checks and Zelle^{®2}
- No monthly account fee and no EverBank ATM fees
- Unlimited ATM fee reimbursement with balances of \$5K or more¹

Give your money a competitive advantage

Grow your emergency fund, develop a savings plan or track your spending. We make it easier to set up and keep your financial goals.

EverBank PerformanceSM Savings

Our highest-yield savings account drives your savings towards peak performance, offering easy mobile and online access.

- \$0 to open
- No monthly account fee
- Mobile check deposit⁶
- FDIC-insured⁸

EverBank CD

With these CDs, you can lock in the savings on your terms.

- \$1,000 to open
- Terms from 3 months to 5 years
- 20-day maturity alert
- Automatic rollover

EverBank Checking

Online and mobile banking come free. Keep fully connected and in charge of your money.

- \$25 to open
- No monthly account fee
- Mobile check deposits⁶
- Free online bill pay
- Apple Pay[®], Samsung Pay and Google Pay[™] mobile payments⁷

1. We do not charge ATM fees and will automatically reimburse you up to \$15 for the ATM fees paid at other U.S. ATMs each month, regardless of your account balances with us. For your bank accounts with us that carry a minimum average daily balance of \$5,000, ATM fee reimbursement is unlimited. Reimbursement is subject to termination for fraud or abuse and will not apply for the month in which your account is closed. You may also use your bank debit card at Allpoint and MoneyPass ATMs nationwide without incurring a fee. Allpoint is a registered trademark of ATM NATIONAL, LLC. MoneyPass and the MoneyPass logo are registered trademarks of U.S. Bank National Association, doing business as Elan Financial Services.
2. Must have a bank account in the U.S. to use *Zelle*.
Zelle and the Zelle related marks are wholly owned by Early Warning Services, LLC and are used herein under license.
3. Our Web Safety Guarantee provides 100% protection for any funds lost due to unauthorized Online Use or an EverBank mistake. Online Use means any service which is used to initiate monetary transactions using our online banking platform, Online Bill Pay and Mobile Banking. Mobile Banking includes banking from web-enabled phones and other mobile devices. EverBank mistakes are limited to errors made solely by EverBank, and do not include those caused partly or entirely by (a) inaccurate or incomplete information provided by you, (b) your misuse of our services or systems, or (c) your failure to comply with all terms of our agreements with you. For more information about your responsibilities, please see the Online Banking Service Agreement and the Web Safety Guarantee section in the Account Terms, Disclosures and Agreements Booklet.
4. Funding limits apply. Please see our website for current funding limits applicable to each CD. Funds for a CDARS® CD may be submitted for placement only after a depositor enters into a CDARS Deposit Placement Agreement with us. This agreement contains important information and conditions regarding the placement of funds by us. CDARS CDs are not funded and opened (“Placed”) immediately. Deposits above single institution FDIC insurance limits will not benefit from higher insurance protection until the deposit is Placed. The date your funds are received sets the earliest time your deposit can be Placed. CDARS CDs are Placed each week on Thursday or the next business day thereafter. Early withdrawal penalties apply. CDARS is a registered service mark of IntraFi Network LLC.
5. CDARS has an overall funding limit per depositor of \$50 million. This overall funding limit includes all deposits placed in the CDARS product through any network bank. This means that if you currently have a CDARS CD with another member bank, the amount of FDIC insurance coverage available to you via the CDARS network when opening a CDARS CD with us will be reduced by the amount you already have placed through the CDARS CD you have with the other bank.
6. Must be an existing bank client enrolled in online banking using the TIAA mobile app. See our Mobile Check Deposit Agreement for information on crediting of deposits. Funds availability subject to the terms within our Funds Availability Disclosure. Both are found in your Personal Account Terms, Disclosures and Agreements Booklet.
7. See Mobile Banking Agreement for details.
Apply Pay is a trademark of Apple Inc., registered in the U.S. and other countries.
Google Pay is a trademark of Google Inc.
Samsung Pay, is a trademark or registered trademark of Samsung Electronics Co., Ltd. Other company and product names mentioned may be trademarks of their respective owners. Device, carrier and card compatibility information can be found on the Samsung Pay Support webpage.
8. The standard FDIC insurance limit of \$250,000 applies per depositor, per insured depository institution for each account ownership category.



NONPROFIT BANKING

Serving you, so you can serve others



As you take care of your organization, we'll take care of you

Nonprofits have unique banking needs, and we get that. So, we offer a full range of accounts and services that help you better manage your organization's finances. This way you have more time to focus on your nonprofit's cause. Plus, with a minimum opening deposit of \$1,500 for most accounts,¹ you'll save time with mobile check deposit² and have exclusive access to our helpful Business Banking specialists.

Options to manage your daily and long-term goals

Working together, we'll find the account that best suits your needs.

Non-Profit Checking

- Low fee nonprofit exclusive
- Competitive interest rates

Business Interest Checking

- Competitive yields on operating balances
- Interest earned can help cover account and service fees

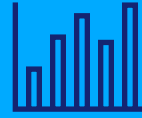
Business Analysis Checking

- Competitive earnings credit rate applied to account fees
- Multiple account balances can be combined to best offset your fees



Checking solutions focused on you

- No monthly maintenance fee with minimum \$5,000 balance¹
- Overdraft protection options
- Concierge service



Turn savings into earnings, on your own terms

Business Money Market

Competitive yields and no monthly maintenance fee with minimum \$5,000 balance,¹ easy access to cash.

Business CD

Wide range of maturities, competitive yields, 20-day maturity notices, no monthly maintenance fee, automatic rollovers.

Increase your efficiency and productivity

Enhance your capabilities with these options that will keep your organization on track and moving forward.

Merchant services⁴

Choose from a variety of point-of-sale payment options that ensure fast, secure transaction authorization.

Overdraft protection option

Link your account to a Business Money Market account to avoid inconvenient overdraft situations.

Select the treasury management services that match your cash flow needs

Money in

- Mobile deposits²
- Remote Deposit Capture³
- ACH collections

Money out

- ACH payments
- Domestic wires
- International & foreign exchange wires
- Business bill pay

Online banking

- Online reporting
- Export options
- ACH & check positive pay
- User controls & limits



**Call 1.866.371.3831, opt 3 to speak with
a Business Banking specialist**

Or visit us online at everbank.com/business

1. Most of our Business deposit accounts have a minimum opening deposit requirement of \$1,500 and a \$14.95 monthly maintenance fee for each month the account's average daily balance falls below \$5,000. Please see the specific product pages on our website for more details about each account.
2. Must be an existing business banking client enrolled in Business Online Banking to access the downloadable Android or Apple mobile banking app and make mobile check deposits. For information on crediting of deposits, the availability of funds for withdrawals and other transactions, see the Funds Availability Disclosure and the Imaged Deposits Service section of the Business and Non-Personal Account Terms, Disclosures and Agreements Booklet. Business Online Banking enrollment is subject to approval and fees may apply.
3. Must be an existing business banking client to enroll in Remote Deposit Capture. For information on crediting of deposits, the availability of funds for withdrawals and other transactions, see the Funds Availability Disclosure and the Imaged Deposits Service section of the Business and Non-Personal Account Terms, Disclosures and Agreements Booklet. Subject to approval.
4. Merchant Services are provided by Elavon, Inc., which is not affiliated with Everbank, its subsidiaries or affiliates. Elavon does provide EverBank with referral fees for new accounts. Merchant Services is an optional program, with all applications subject to approval by Elavon. Fees apply.



BUSINESS BANKING

Simplify your banking and start thinking bigger



We have the right tools to help keep your business growing

Efficiency and earnings are vital to your success. And our range of business accounts and solutions are built around these two simple concepts. From sole proprietors to large businesses, we have a solution to fit your needs. Plus, with a minimum opening deposit of \$1,500 for most accounts,¹ you'll save time with mobile check deposit² and have exclusive access to our helpful Business Banking specialists.

Options to manage your daily and long-term goals

Working together, we'll find the account that best suits your needs.

Business Checking

- Low fee everyday account
- First 200 items processed free per month

Non-profit Checking

- Low fee non-profit exclusive
- Competitive yields on all balances

Analysis Checking solutions

- Business Interest Checking - interest bearing option
- Business Analysis Checking - earnings credit option

Small Business Checking

- For sole proprietors and single-owner LLCs only
- Competitive yield on balances

Turn savings into earnings, on your own terms

Business Money Market

Competitive yields and no monthly maintenance fee with minimum \$5,000 balance,¹ easy access to cash.

Business CD

Wide range of maturities, competitive yields, 20-day maturity notices, automatic rollovers.

WorldCurrency® accounts

Our global business solutions include foreign currency denominated money market accounts, CDs, and CD Baskets³ and **non-FDIC insured** Metals Select® accounts.⁴

Increase your efficiency and productivity

Large or small, every business can profit from smarter ways to increase efficiency. We offer a full suite of treasury management solutions that can help keep your business running smoothly.

Positive Pay fraud detection

With every EverBank business account, you have access to a variety of security measures to help reduce fraud risk. Let us help you prevent unauthorized transactions to protect your funds and hard-earned profits.

Merchant services⁵

Choose from a variety of point-of-sale payment options that ensure fast, secure transaction authorization.

Overdraft protection

Link your account to a Business Money Market account to avoid inconvenient overdraft situations.



Solutions that can simplify your day to day

Moving money

- Mobile check deposits²
- ACH payments and collections
- Domestic, international and foreign currency wires

Comprehensive reporting

- Transaction reporting with images
- EDI reports
- QuickBooks® Web Connect, export to Excel⁶

Online bill pay

- Schedule one-time or recurring payments
- Enroll companies and accounts separately
- Mobile bill pay for existing payees



Call 1.866.371.3831 opt3 to speak with a Business Banking specialist

Or visit everbank.com/business

1. Most of our Business deposit accounts have a minimum opening deposit requirement of \$1,500 and a \$14.95 monthly maintenance fee for each month the account's average daily balance falls below \$5,000. Please see the specific product pages on our website for more details about each account.
2. Must be an existing business banking client enrolled in Business Online Banking to access the downloadable Android or Apple mobile banking app and make mobile check deposits. For information on crediting of deposits, the availability of funds for withdrawals and other transactions, see the Funds Availability Disclosure and the Imaged Deposits Service section of the Business and Non-Personal Account Terms, Disclosures and Agreements Booklet. Business Online Banking enrollment is subject to approval and fees may apply.
3. Deposits denominated in foreign currencies are susceptible to losses and gains due to currency price fluctuations and may result in a loss of principal.
4. Metals Select® products:

Are Not FDIC Insured	Are Not Bank or Government Guaranteed	Are Not Deposits	May Lose Value
-----------------------------	--	-------------------------	-----------------------

Purchasing or owning metals involves degrees of risk that make them unsuitable for certain individuals. You should carefully consider the suitability of such metals before making any decision. Metals Select transactions will not occur until your account is approved and sufficient funds are available. Please refer to the Specific Terms - Metals Select Accounts section in your Account Terms, Disclosures and Agreements Booklet for additional information.

5. Merchant Services are provided by Elavon, Inc., which is not affiliated with EverBank, its subsidiaries or affiliates. Elavon does provide EverBank with referral fees for new accounts. Merchant Services is an optional program, with all applications subject to approval by Elavon. Fees apply.
6. QuickBooks is a registered trademark of Intuit Inc.
Microsoft Excel are registered trademarks of Microsoft Corp.



WORLD CURRENCIES & PRECIOUS METALS

Discover the peace of mind of a well-balanced portfolio



Capture opportunity, minimize risk and sleep better at night

No matter what your preference is, EverBank has many different ways to help you meet your short or long-term financial goals.

Our wide range of solutions can possibly help you:

- Reduce volatility, by helping you diversify your investments
- Provide a potential hedge against inflation
- Realize the potential for capital appreciation

Get diversified beyond the dollar

Many financial advisors agree that expanding your investments beyond the U.S. dollar can be a great portfolio protection strategy. At EverBank, we make it easy to include these valued asset classes in your nest egg.



World currencies

Adding foreign currencies can mean broader diversification, less portfolio volatility and new gains.¹



Precious metals

While **not FDIC-insured**,⁸ the metals are prized for their beauty, and have tended to perform in uncertain economic times.¹²



Expert know-how

Our team of experts are here for you whenever you have questions, need help or want to make a transaction.

Get your money moving in all new directions

Introduce your money to the world with simple ways to include one or multiple currencies in your portfolio.¹ Whatever your goals, EverBank offers you WorldCurrency[®] accounts that are FDIC insured against bank insolvency² and are IRA eligible. Best of all, you'll get an exchange rate that is within 1% of the rates available to us.³

WorldCurrency CDs

Diversify your portfolio with a single foreign currency CD, and earn interest at a competitive rate for certain currencies.⁴

- \$10,000 to open
- 3-month term
- Access to emerging markets
- No rollover fees

WorldCurrency CD Baskets

Choose from CD Baskets that benefit from a mix of single currency CDs. It's a smart way to diversify in multiple foreign currencies at once.


- \$20,000 to open
- 3-month term
- No rollover fees


WorldCurrency Access[®] Deposit account

Enjoy earnings potential and flexibility in this foreign-currency money market account. Add, withdraw and transfer funds between currencies.


- \$2,500 to open or \$100/mo. purchase plan⁵
- Some accounts bear interest with minimum balance⁴
- Monthly maintenance fee may apply⁶


Offering 20 of the world's major currencies

 Australian dollar


 Brazilian real⁷

 British pound


 Canadian dollar


 Chinese yuan


 Czech koruna


 Danish krone

 Euro

 Hong Kong dollar


 Hungarian forint

 Indian rupee⁷

 Japanese yen


 Mexican peso

 New Zealand dollar

 Norwegian krone

 Polish zloty

 Singapore dollar

 South African rand

 Swedish krona

 Swiss franc

Currency availability may differ across account types and can change without notice.
For a complete listing of all currencies we offer,

Call 1.800.926.4922 or visit us online at everbank.com

See how you can diversify across borders

The currencies included in each CD basket share one overarching characteristic: they're either commodity rich, driven by sound economic strategies or geographically inspired.

Commodity rich

The countries represented in these baskets may benefit from increased world demand for their tremendous natural resources.

CD Basket	Breakdown
Commodity	Australian dollar-25%, Canadian dollar-25%, New Zealand dollar-25%, South African rand-25%
Global Power Shift ^{®7}	Australian dollar-25%, Brazilian real-25%, Canadian dollar-25%, Norwegian krone-25%
New World Energy SM	Australian dollar-33.3%, Canadian dollar-33.3%, Norwegian krone-33.3%
Ultra Resource [®]	Australian dollar-16.6%, Canadian dollar-16.6%, Hong Kong dollar-16.6%, New Zealand dollar-16.6%, Norwegian krone-16.6%, Singapore dollar-16.6%

Economy driven

The countries represented in these baskets may benefit because of sound economic strategies that help drive their monetary strength.

CD Basket	Breakdown
Balanced Debt ^{®7}	Australian dollar-20%, Brazilian real-20%, Norwegian krone-20%, Singapore dollar-20%, Swiss franc-20%
Euro Trax [®]	Euro-40%, Norwegian krone-20%, Swedish krona-20%, Swiss franc-20%
Global High Yield ⁷	Brazilian real-25%, Indian rupee-25%, Mexican peso-25%, South African rand-25%
Prudent Central Bank	Australian dollar-25%, British pound-25%, Euro-25%, New Zealand dollar-25%

Geographically aligned

The countries represented in these baskets may benefit from certain regional strengths and geopolitical strategies.

CD Basket	Breakdown
Pan-Asian SM	Australian dollar-40%, Hong Kong dollar-20%, Japanese yen-20%, Singapore dollar-20%
Viking [®]	Norwegian krone-40%, Danish krone-30%, Swedish krona-30%

Add some luster to your portfolio

Precious metals have long been a popular choice for portfolio diversification and a potential hedge against inflation. When you open a **non-FDIC insured** Metals Select® account,⁸ you get access to a wide range of investment options and competitive pricing.⁹ Better still, you'll be working with a healthy and reputable financial institution that you can trust with your metals purchases.

Metals Select unallocated account

An unallocated account is a simple, cost-effective way to diversify in precious metals. With each purchase, your metal is pooled with that of other clients. Of course, you can always convert to an allocated account¹⁰ and request that we store or deliver your metals for a fee.

- \$5,000 to open or \$100/mo. purchase plan⁵
- No annual account fee
- Gold, silver, platinum & palladium available

Metals Select allocated account

With an allocated account you can request to have us store your metals, or have them delivered to your door. Annual storage and delivery fees may apply. We offer competitive pricing on a wide range of the world's most popular coins.⁹

- \$7,500 to open
- Gold, silver, platinum & palladium coins available
- Most coins are IRA eligible ¹¹

Our pricing advantage

With EverBank, you only pay within 1% of the prices available to us.⁹

Gold

- 1 oz. American Eagles
- 1 oz. American Buffalos
- 1 oz. Australian Kangaroos
- 1 oz. British Britannias
- 1 oz. Canadian Maple Leafs
- 1 oz. South African Krugerrands
- 1 oz. Vienna Philharmonics

Silver

- 1 oz. American Eagles
- 1 oz. Australian Kangaroos
- 1 oz. British Britannias
- 1 oz. Canadian Maple Leafs
- 1 oz. Vienna Philharmonics

*Platinum and palladium selections also available.

Metals selection can change without notice. For a complete listing of all metals we offer,

Call 1.800.926.4922 or visit us online at [everbank.com](https://www.everbank.com)



Call 1.800.926.4922 to speak with an expert today.

Or to apply, visit everbank.com/investing

- Deposits denominated in foreign currencies are susceptible to losses and gains due to currency price fluctuations and may result in a loss of principal.
- EverBank, N.A. is an FDIC insured national bank. The standard FDIC insurance limit of \$250,000 applies per depositor, per insured depository institution for each account ownership category. FDIC insurance covers against loss due to the failure of the institution, but not due to fluctuations in currency values. Due to the nature and volatility of the foreign exchange market, the values of currencies are subject to wide fluctuations against the U.S. dollar. Foreign currency denominated instruments will entail significant risk exposure to adverse movements of the foreign currency relative to the U.S. dollar. The amount of deposit insurance available for products denominated in foreign currency will be determined and paid in the United States dollar equivalent of the foreign currency, as the value of such currency is determined by the FDIC under its regulations, on the institution's date of default. You can lose money, including principal, due to currency fluctuations. Please only deposit money that you can afford to risk, and as part of a broadly diversified strategy.
- If you request funds in this account be denominated in a currency other than the currency you deposit with us, we will convert your currency using a Customer Exchange Rate that is within 1% of the Wholesale Rate for the selected foreign currency. The Wholesale Rate is a market price that we determine is available to us in the Wholesale Market for a specific Foreign Currency at a specific point in time. Exceptions may occur if we agree in our sole discretion to lock in your rate before the transaction. The Wholesale Rate is determined by us on a transaction-by-transaction basis and varies with the applicable wholesale trading market. Wholesale Rates are not published or publicly available. You are not obligated to conduct Currency Exchange transactions with us. For more information about our Exchange Rates, please see the Specific Terms - WorldCurrency® Deposit Accounts section in the Account Terms, Disclosures and Agreements Booklet.
- Not all WorldCurrency® accounts pay interest. Single currency CDs and multi-currency CD Baskets generally offer a fixed interest rate. Certain WorldCurrency Access® accounts earn interest. Interest earned will be calculated and credited in the account's denominated currency. Please visit our website for current rates and minimum balances to earn interest.
- We reserve the right to terminate the Automatic Purchase Plan or your involvement in this Plan at any time, for any reason, including, but not limited to overdrafts of your companion cash management account.
- To view current monthly maintenance fees, visit our website at <http://www.everbank.com/currencyrates>. Any monthly maintenance fee charged to your account will be disclosed to you on your rate sheet at the time that you open your account, or on a separate disclosure that we will provide to you at least 30 days prior to imposing or changing any monthly maintenance fee. In addition, any monthly maintenance fee will be charged in the Foreign Currency in which the applicable WorldCurrency Access Deposit Account is denominated. See the Account Terms, Disclosures and Agreements Booklet for additional information regarding the monthly maintenance fee.
- This account is denominated or partially denominated in a Non-Deliverable Currency ("NDC"). We cannot deliver NDCs to you. We cannot send you such currencies in physical form, by check, by wire or through any other method. This means that, if you open a NDC Account, you will be able to withdraw your funds only in U.S. dollars. If the NDC Exchange Rate that we can provide to you when you withdraw funds is less favorable to you than when you opened your NDC Account, you will lose money. Do not open a NDC Account if you cannot afford this risk of loss. See the Specific Terms - WorldCurrency® Deposit Accounts section in your Account Terms, Disclosures and Agreements Booklet for more information.
- Metals Select® products:

Are Not FDIC Insured	Are Not Bank or Government Guaranteed	Are Not Deposits	May Lose Value
-----------------------------	--	-------------------------	-----------------------

Purchasing or owning metals involves degrees of risk that make them unsuitable for certain individuals. You should carefully consider the suitability of such metals before making any decision. Metals Select transactions will not occur until your account is approved and sufficient funds are available. Please refer to the Specific Terms - Metals Select Accounts section in your Account Terms, Disclosures and Agreements Booklet for additional information.

- When selling or purchasing metals to or from you, we will offer a Customer Price that is within 1% of the Wholesale Price. The Wholesale Price is the price at which we determine we are able to buy or sell metals at a specific point in time. Exceptions may occur if we agree in our sole discretion to lock in your price before the transaction. The Wholesale Price is determined by us on a transaction-by-transaction basis and varies with the applicable wholesale trading market. Wholesale Prices are not published or publicly available. For more information about our precious metals pricing, please see the Specific Terms - Metals Select® Accounts section in the Account Terms, Disclosures and Agreements Booklet.
- You may convert some or all of the Precious Metals in your Unallocated Account into an Allocated Account at any time, subject to the minimum transaction value for a new Allocated Account. In order to convert your Unallocated Account to an Allocated Account, we will sell the Precious Metals in your Unallocated Account at the then current Wholesale Price and use the proceeds to purchase Precious Metal coins, also at the Wholesale Price. On conversion, you will be charged the difference in cost between the Wholesale Price for the purchase of the allocated Precious Metals and the Wholesale Price for the sale of the unallocated Precious Metals. We reserve the right to determine the number and size of the coins purchased. Although you will not be required to pay a Spread in connection with this conversion, you may incur either account or delivery fees applicable to Allocated Accounts.
- Only Allocated Metals are IRA eligible. Call for current coin availability.
- Past performance is not a guarantee of future results.





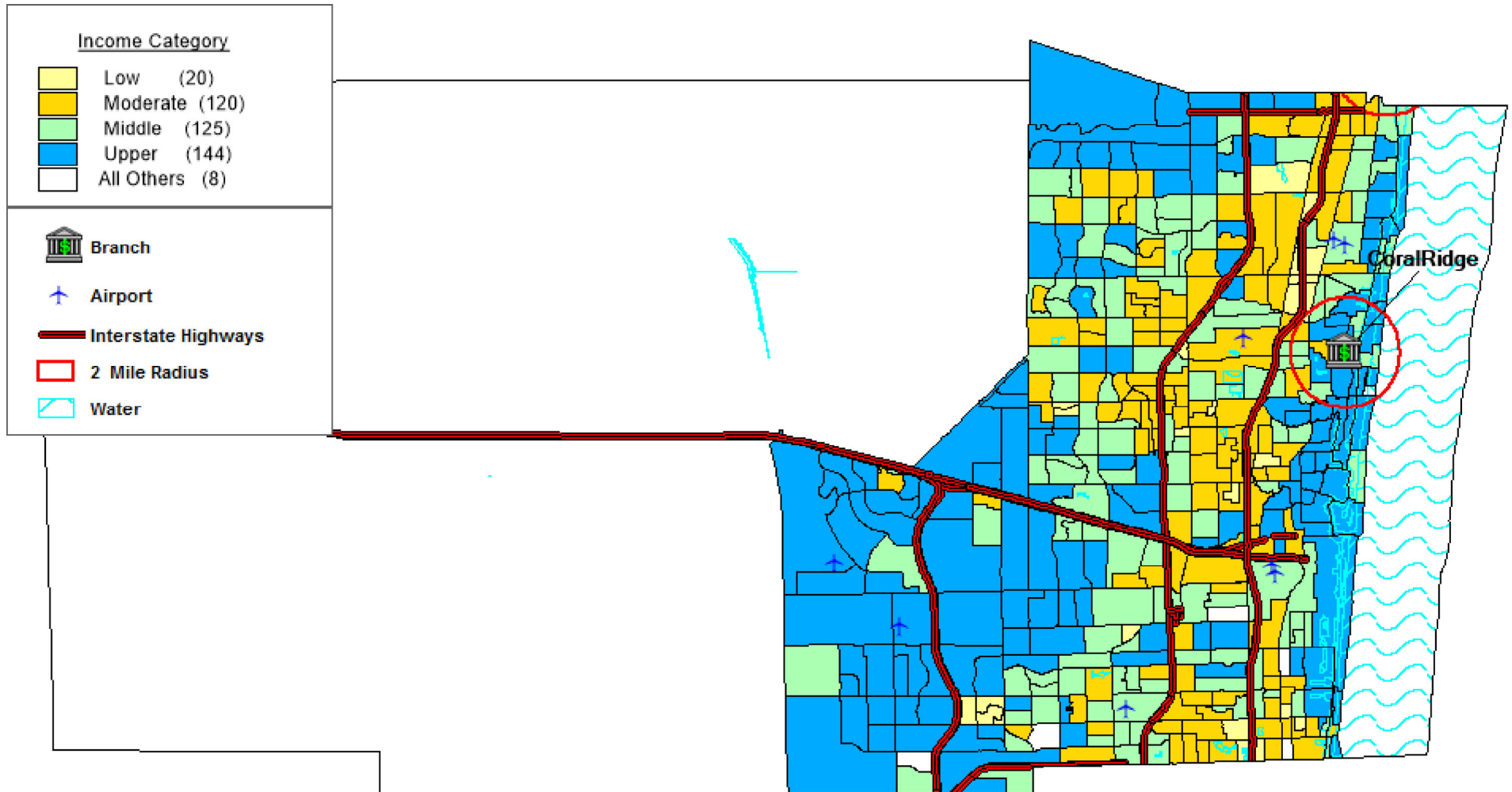
Assessment Areas

2024 EverBank Assessment Areas

<i>Assessment Area</i>	<i>MSA Code</i>	<i>MSA/MD Description</i>	<i>County Name</i>	<i>Partial MSA</i>	<i># of Branches /ATMs</i>
Duval	27260	Jacksonville, FL MSA	Duval (031)	Y	3 Branches, 1 Standalone ATM
Lee	15980	Cape Coral - Fort Myers, FL MSA	Lee (071)	N	1 Branch
Broward	22744	Fort Lauderdale - Pompano Beach - Deerfield Beach MD	Broward (011)	N	1 Branch
Miami-Dade	33124	Miami - Miami Beach - Kendall, FL MD	Miami-Dade (086)	N	1 Branch
Collier	34940	Naples - Marco Island, FL MSA	Collier (021)	N	1 Branch
Palm Beach	48424	West Palm Beach - Boca Raton - Boynton Beach, FL MD	Palm Beach (099)	N	1 Branch
Pinellas	45300	Tampa - St. Petersburg - Clearwater, FL MSA	Pinellas (103)	Y	1 Branch
Total:					9 Branches, 1 Standalone ATMs

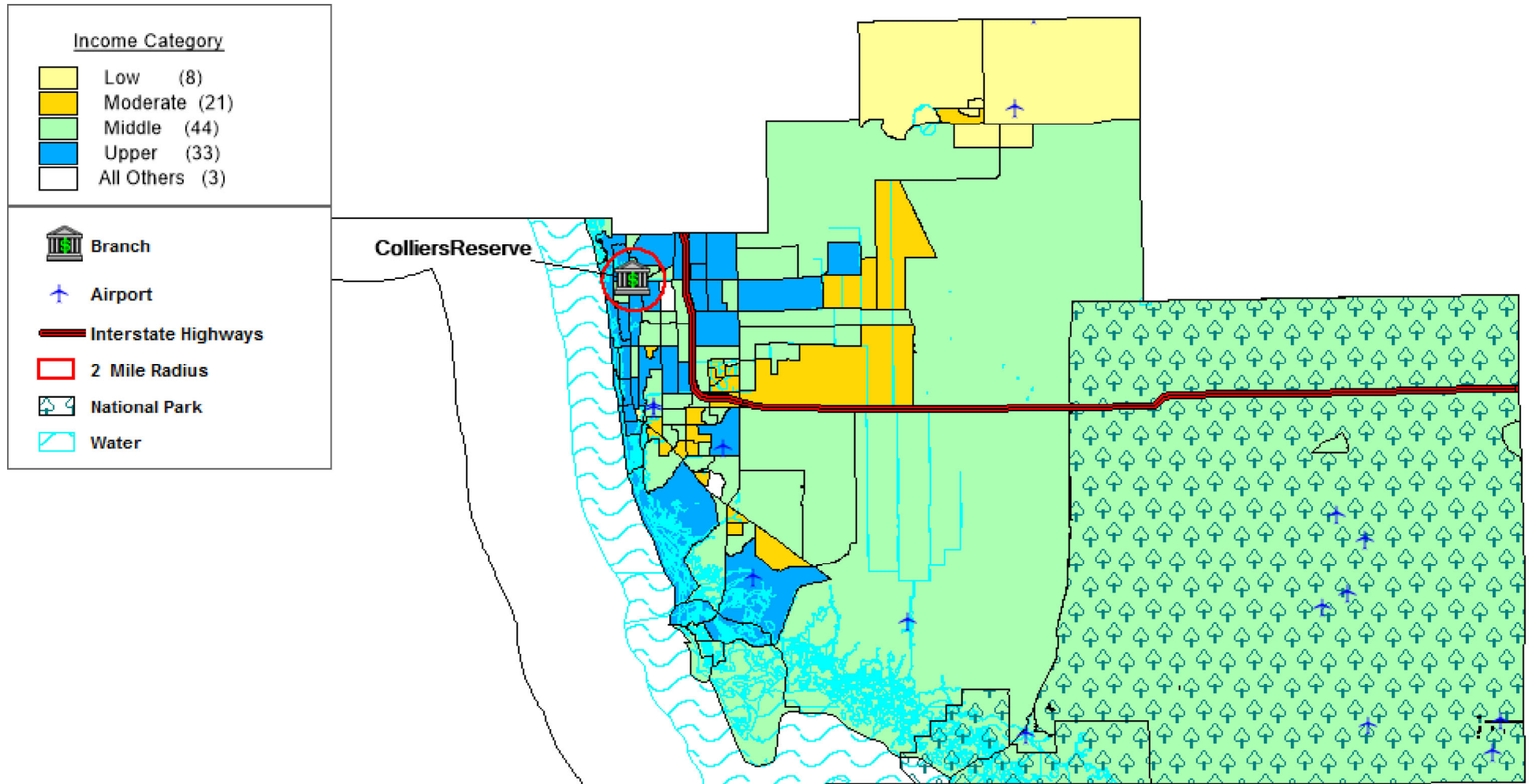


2024 Broward County Assessment Area



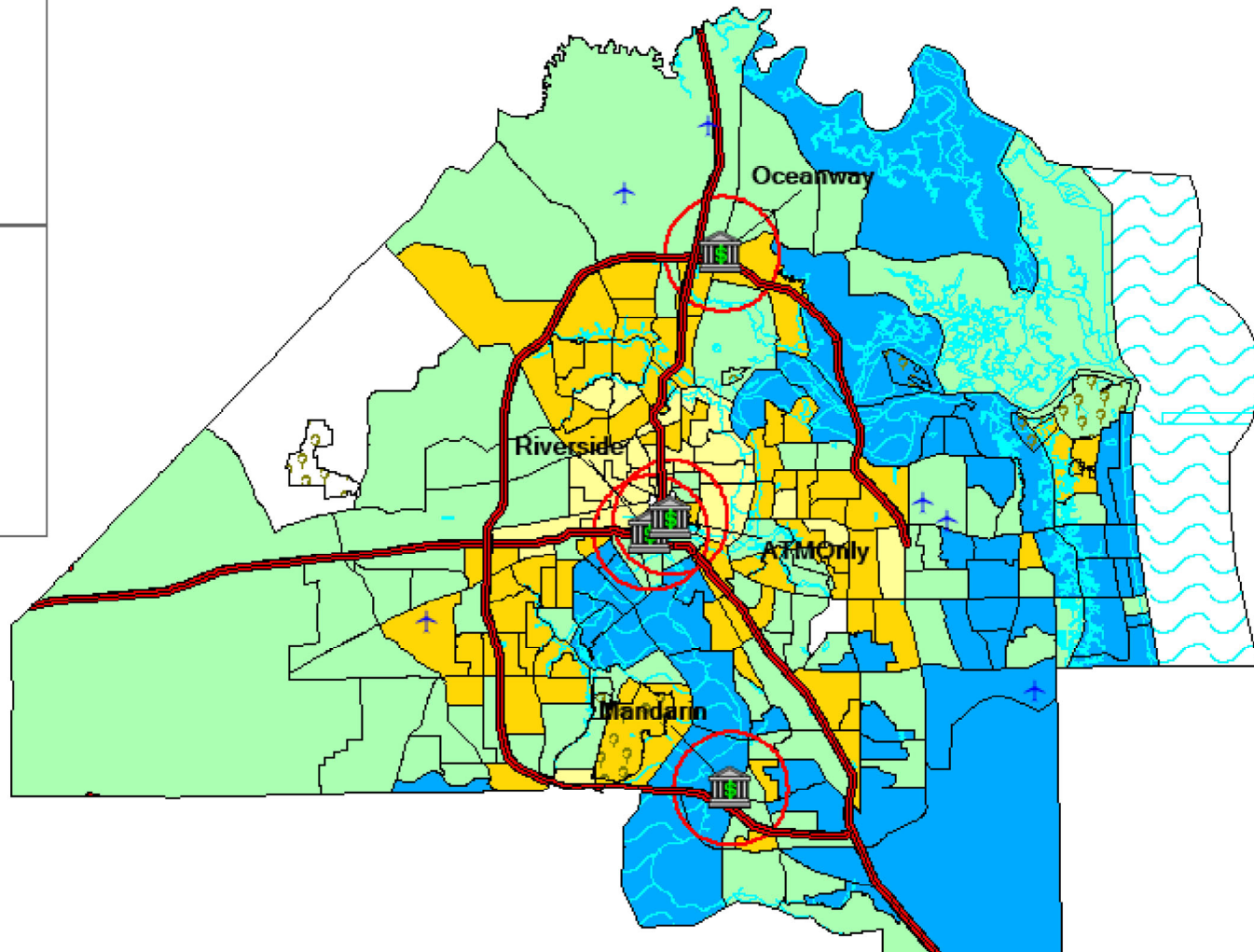
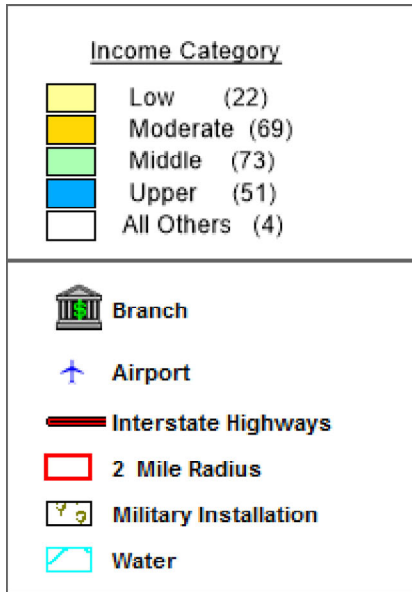


2024 Collier County Assessment Area



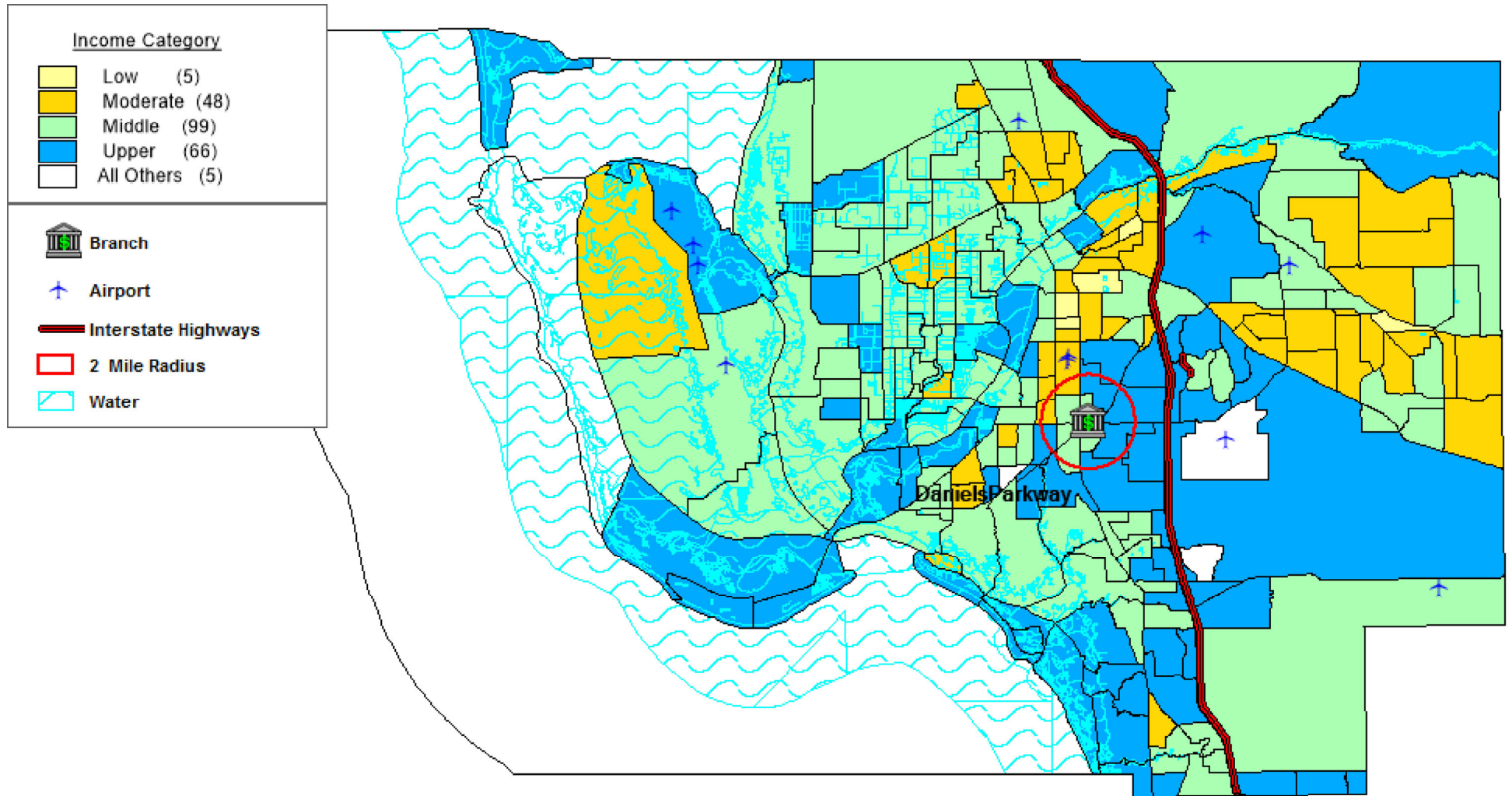


2024 Duval County Assessment Area





2024 Lee County Assessment Area





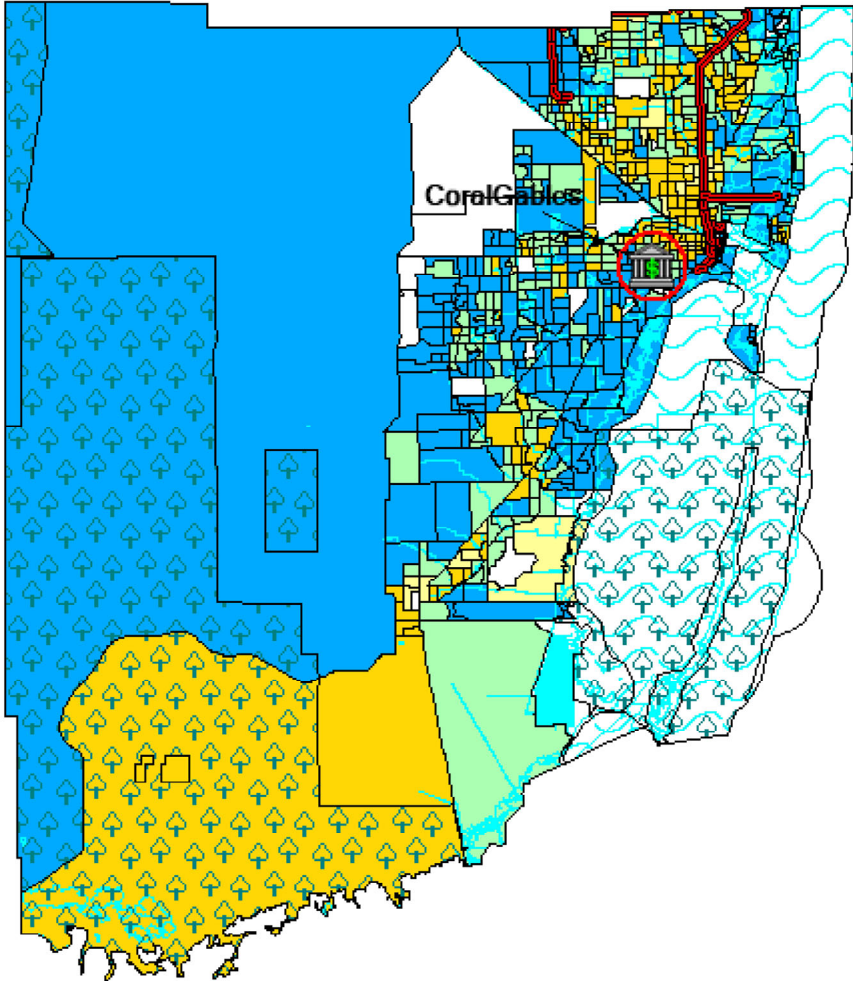
2024 Miami-Dade County Assessment Area

Income Category

- Low (34)
- Moderate (176)
- Middle (221)
- Upper (243)
- All Others (33)

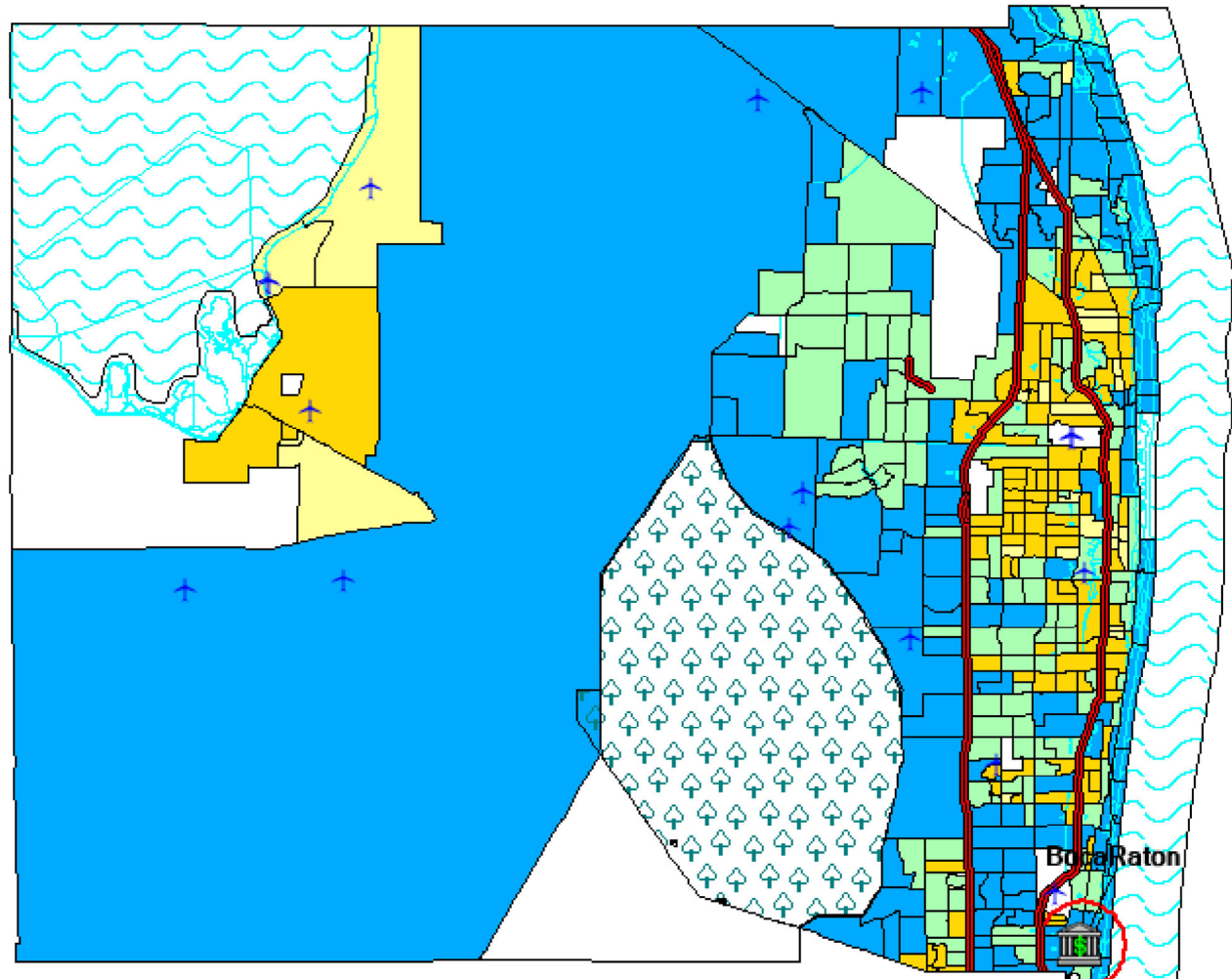
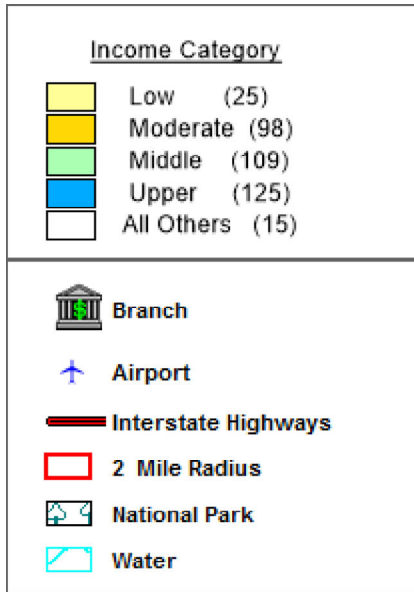
Branch

- Interstate Highways
- 2 Mile Radius
- National Park
- Water



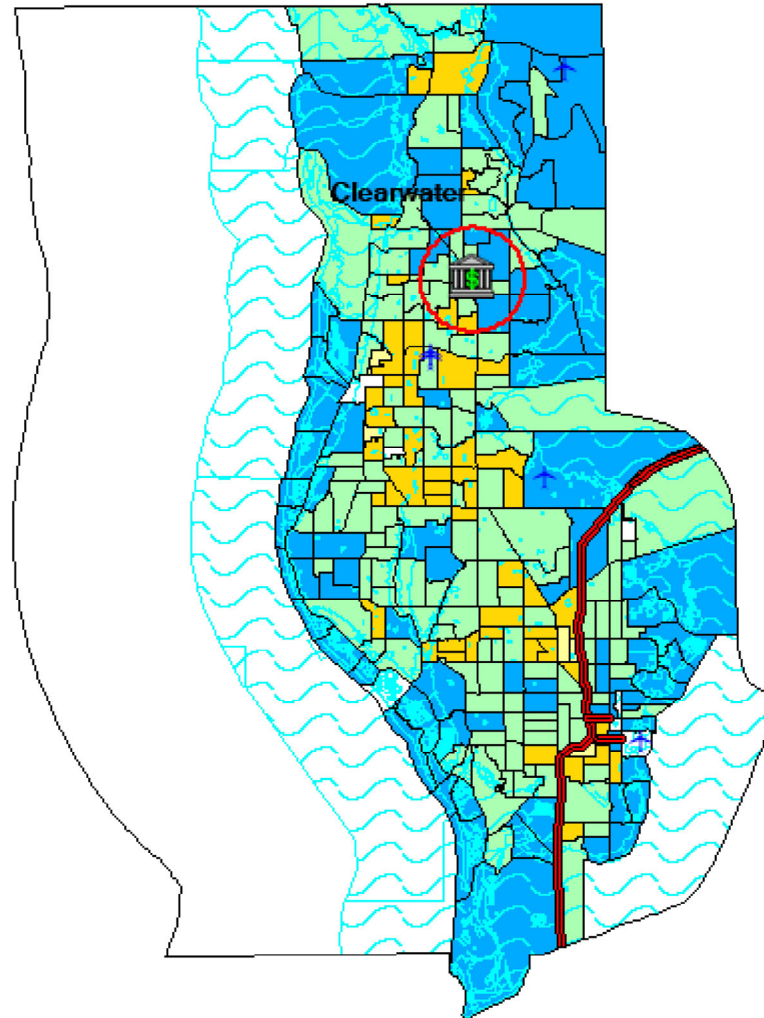
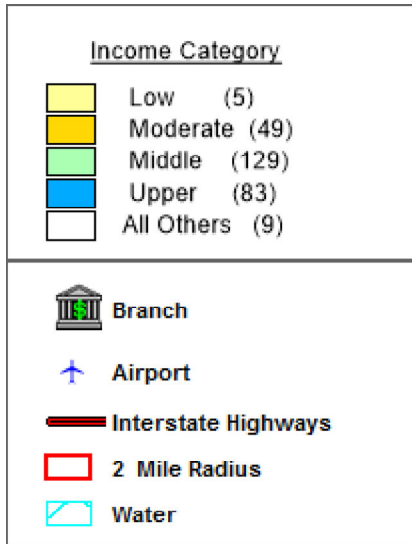


2024 Palm Beach County Assessment Area





2024 Pinellas County Assessment Area





HMDA & CRA Disclosure Statements

Effective January 1, 2018,

A bank required to report home mortgage loan data pursuant part 1003 of this title shall include in its public file a written notice that the institution's HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's (Bureau's) website at www.consumerfinance.gov/hmda. The bank shall place the written notice(s) in the public file within three business days after receiving notification from the Federal Financial Institutions Examination Council of the availability of the disclosure statement(s).

If you would like a hard copy of the HMDA or CRA Disclosure Statement, please contact the person listed below.

Theresa Connolly
TIAA Bank
301 West Bay Street
Jacksonville, FL 32202
Phone 212-916-6426
Theresa.Connolly@EverBank.com