

PUBLIC DISCLOSURE

January 26, 2015

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**TotalBank
Certificate Number: 21468**

**100 Southeast Second Street
Miami, Florida 33131-2100**

**Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
10 Tenth Street, Northeast, Suite 800
Atlanta, Georgia 30309-3906**

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, nor should it 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.

INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

PERFORMANCE TEST RATINGS TABLE:

The following table indicates the performance level of TotalBank with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	TOTALBANK		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

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

- The bank continues to hold three Fannie Mae and two Ginnie Mae mortgage-backed securities with an aggregate book value of over \$2.9 million. Since the previous evaluation, the bank has also purchased two Fannie Mae mortgage-backed securities with an aggregate book value of \$1.8 million. The mortgage-backed securities are structured to meet the requirements of CRA-qualified investments.
- In 2012, the bank increased its holding of a \$2.0 million investment in the CRA Qualified Investment Fund to \$3.0 million. In 2013 and 2014, the bank purchased another \$800,000 and \$1.5 million, respectively, for a total of \$5.3 million. This investment was a part of Fannie Mae and Ginnie Mae pools, secured by rental housing restricted to low- and moderate-income individuals.
- The bank continues to hold a \$2.6 million investment in the form of a municipal bond to the Miami Beach Redevelopment Agency (RDA). The RDA is an arm of the Miami Beach government. The bond finances the redevelopment of a distressed moderate-income census tract located in Miami Beach. The area has been targeted for reinvestment by Miami Beach and is designated a Community Revitalization Area.
- The bank continues to hold a \$500,000 bond to fund the Senior Housing Crime Foundation. The income from the bond funds expenses of the Senior Crimestopper Program. The bank's investment supports the operation of the Senior Crimestopper Program for 180 low- and moderate-income individuals residing in a senior living facility.

Donations

TotalBank provided monetary donations to over 25 different organizations totaling \$122,685. TotalBank made 15 donations in 2012 totaling \$32,416, 18 donations totaling \$36,000 in 2013, and 20 donations totaling \$54,269 in 2014. All of the donations provided funds to local organizations that furnish much needed services to low- and moderate-income individuals, including children. For example, several of the donations supported a variety of community development activities, such as affordable housing or economic development.

SERVICE TEST

TotalBank's delivery systems are reasonably accessible to all portions of the AA, and the opening and closing of branches has improved the accessibility of those delivery systems. Bank hours and services do not vary in a way that inconveniences any portion of the AA, and the bank provides a relatively high level of community development services.

Retail Banking Services