



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# INTERMEDIATE SMALL BANK

## PUBLIC DISCLOSURE

January 7, 2019

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Farm Bureau Bank, FSB  
Charter Number 715205

2165 Green Vista Drive, Ste. 204  
Sparks, NV 89431

Office of the Comptroller of the Currency  
10001 Reunion Place, Suite 250  
San Antonio, TX 78216

**NOTE:** This document is an evaluation of this bank'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 bank. This evaluation is not, and should not be construed as, an assessment of the financial condition of this bank. The rating assigned to this bank does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

**The institution is rated: Satisfactory.**

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

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

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is more than reasonable.
- Lending in the assessment areas (AAs) is reasonable given the bank's non-traditional business strategy, despite a limited percentage of loans originating within the AAs.
- The overall geographic distribution of loans reflects reasonable distribution in low- and moderate-income (LMI) census tracts.
- The overall borrower distribution of loans by income level of the borrower reflects reasonable distribution to borrowers of different income levels.
- The level of community development (CD) activities reflects adequate responsiveness in relation to the bank's performance context, and reflects adequate responsiveness to AA needs.

## Definitions and Common Abbreviations

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

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

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

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

**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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's AA(s) or outside the AA(s) provided the bank has adequately addressed the CD needs of its AA(s).

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

**Geography:** A CT 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 MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

**Market Share:** The number of loans originated and purchased by the bank as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the AA.

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

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

**Metropolitan Division (MD):** 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 MD 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 (MSA):** 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 MSA 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 MFI 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 MFI that is at least 50 percent and less than 80 percent, in the case of a geography.

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

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

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

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report).

These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

## Description of Institution

Farm Bureau Bank, FSB (“FBB” or “the bank”) is an interstate bank headquartered in Sparks, NV. The bank is a non-traditional thrift and is wholly owned by FB Bancorp, the bank holding company that is also headquartered in Sparks, NV. Although the bank is headquartered in Sparks, NV, the bulk of their operations are run out of their branch in San Antonio, TX. As of December 31, 2017, FBB had total assets of \$774.1 million, total loans of \$732.6 million, and tier 1 capital of \$77.1 million.

The bank has two locations; its main office in Sparks, NV and a location in San Antonio, TX, which serves as the bank’s operations center and administrative office. The counties that these two branches are housed, Washoe County, NV, and Bexar County, TX, serve as the bank’s two AAs. The bank has designated these entire counties as their AAs, noting no barriers to entry in either county.

Washoe County, NV is located in northwest Nevada and had about 435 thousand people as of the 2010 census. The majority of the county’s population lives in either Reno or Sparks, which account for over 80 percent of the county’s total inhabitants. These two cities are both part of the Reno-Sparks MSA. Reno’s economy has been expanding recently, partially spurred by the Tesla Gigafactory that was opened in 2016. This factory is expected to drive continued growth in the area in the near-term future, with other companies likely to compete for space at the nearby industrial park. Unemployment rates have seen a steady decline over the past several years, dropping from 11.1 percent in 2012 to 3.9 percent as of June 30, 2018, with median household income increasing by about \$12 thousand over this timeframe. The hot job market has caused a rising demand in single-family housing, with new residents spiking up rent prices and causing a very low rental vacancy rate.

Bexar County, TX is located in central Texas and consists of the city of San Antonio and the surrounding area. San Antonio’s economy has been experiencing an expansion over the past several years, and this is expected to continue at a more modest pace moving forward. The United States military remains the most significant employer in the area, with over 75 thousand employees as of 2017 due to the presence of the joint military base. H-E-B and USAA are other major employers in the area, each with over 17 thousand employees. Unemployment is low at about 3.4 percent, with the median household income increasing by about \$9 thousand since 2012. Population growth has been relatively steady at about 2 percent per year over the same time frame. Unique factors to the San Antonio market include a significant exposure to the Eagle Ford Shale oil and gas activity that is nearby, south of the county, and an exposure to Mexican trade and distribution.

During the evaluation period, there were no branch openings or closures. FBB does not have a traditional retail branch platform. The bank relies on Farm Bureau insurance agents located throughout the country to refer much of its business. The vast majority of FBB’s business is conducted through internet, mail, or telephone.

FBB offers various products, including checking, savings, certificates of deposit, online and mobile banking, wire transfers, consumer loans, commercial loans, real estate loans, and small business loans. The bank receives a majority of its deposits and loan payments by mail or wire transfer from across much of the United States. Its primary lending business is in auto loans

and credit cards loans, which compose most of the bank's earning assets. FBB is not a HMDA reporting institution.

The bank primarily serves Farm Bureau Federation members in all 50 states, with nearly 6 million Farm Bureau Federation members located throughout the country. While most of the bank's customers are Farm Bureau members, the bank does not require membership to conduct business. Farm Bureau insurance agents generally refer business to the bank, as these agent offices do not accept deposits or applications, they are not considered branches. While Farm Bureau Insurance has members in all 50 states, a significant amount of the bank's activity comes from southern states. In particular, much of their lending activity is derived from rural, agricultural areas.

FBB is a unique financial institution in regards to its operational structure. The bank operates with a limited physical infrastructure, with only the two physical locations and only one true operating branch. As such, FBB does not provide a well-established avenue for cash transactions, and does not advertise itself as a traditional walk-in bank. Since FBB is not a traditional institution, their peers and competitors are more unique than most banks as they are truly a nationally-focused institution, and their business model that is based on insurance agent referrals makes them even more unique. With their non-physical infrastructure and their national focus, FBB does not truly have a significant deposit market share in any geographical location, including their two AAs. The geographical areas of higher loan and deposit concentration will really depend on how active the Farm Bureau Insurance agents are in that particular area.

The last CRA evaluation was on February 2, 2015 and resulted in an overall Satisfactory rating.

There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs in its AA.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We completed a review of the bank's CRA performance in its AAs under the Intermediate Small Bank (ISB) examination procedures, which includes a lending test and a community development (CD) test. The lending test evaluates the bank's record of meeting the credit needs of the bank's AAs through its lending activities. The CD test evaluates the bank's responsiveness to CD needs in its AAs through qualified lending, investments and donations, and services.

The evaluation period for the lending test is January 1, 2015 through December 31, 2017. FBB's primary lending products are auto loans and credit cards loans, which represent 47 and 45 percent of total loans, respectively. We performed revenue and geographic distribution analyses on all 216 loans originated or purchased inside the AAs. Home mortgage loans, small loans made to businesses, and small loans to farms were not a primary loan product; therefore, we did not evaluate these products separately. The evaluation period for the CD test is from January 6, 2015 through December 31, 2017.

In our evaluation under the Lending Test geographic distribution and borrower income criteria, we performed separate analyses of 2015 through 2016 data and 2017 data. This was due to changes between the 2015 U.S. Census American Community Survey. Performance tables in appendix D include data covered by the analysis period 2015-2016 and 2017.

### Data Integrity

The bank is not required to collect or report loan data for home mortgage or business loans; management has elected not to collect the data and present it for analysis. The OCC performed a review in October 2018 to assess the data integrity of consumer lending data and documentation of CD activities. The OCC identified integrity issues with the bank's initial lending datasets that were remedied by management prior to the conclusion of the review. The OCC validated that the corrective actions were effective and determined the datasets to be accurate for use at this CRA examination.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, an AA within that state metropolitan area was selected for full-scope reviews. Full-scope reviews consider quantitative and qualitative factors, as well as performance context factors. There were no limited-scope areas tested during our review. Refer to the "Scope" section under each State Rating section for details regarding how the areas were selected.

### Ratings

The bank's overall rating is a blend of the ratings for both states. The state ratings are based primarily on those areas that received full-scope reviews. Refer to the "Scope" section under

each State Rating section for details regarding how ratings were determined. The Texas rating area carried the greatest weight in our conclusions because the state represented the bank's most significant market in terms of deposit concentration. As of June 30, 2017, deposits in Texas consisted of 99.99 percent of FBB's total deposits.

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

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this bank [or any affiliate whose loans have been considered as part of the bank'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 bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## Conclusions with Respect to Performance Criteria

### Loan-to-Deposit Ratio

FBB's LTD ratio is more than reasonable. The bank's quarterly LTD ratio since the previous CRA evaluation averaged 107.56 percent, with a high ratio of 109.78 percent in the first quarter of 2017. We compared the bank's LTD ratio to other banks in Washoe County, NV and Bexar County, TX ranging in total asset sizes from \$643 million to \$829 million. The peer group bank's average LTD ratio was 93.69 percent with a high average ratio of 114.28 percent and a low average ratio of 80.55 percent. FBB's quarterly LTD compared favorably to these institutions.

### Lending in Assessment Area

After consideration of performance context, the bank's originations and purchases of loans is reasonable. Lending in the AA meets the standard for satisfactory performance based on the bank's capacity, despite a limited number of loans, by both number and dollar volume, being originated within the bank's AAs. While FBB only originated a minimal amount of its loans within the AA, this is attributed to their business model rather than a weakness in identifying lending opportunities in their AA. The bank does not take in a significant amount of deposits or originate a significant number of loans in either AA, with the bank's non-physical branch delivery focus resulting in limited ability for the bank to have significant concentrations in any one area. The following table details the bank's lending inside and outside its AA by number and dollar amount:

<b>Table 1 - Lending Inside and Outside of the Assessment Area</b>										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$000s	%	\$000s	%	
Small Business	6	0.2%	2,987	99.8%	2,993	236	0.3%	79,101	99.7%	79,337
Small Farm	1	0.0%	4,546	100.0%	4,547	11	0.0%	116,587	100.0%	116,598
Consumer Loans	209	0.3%	72,461	99.7%	72,670	2,610	0.2%	1,158,304	99.8%	789,841
<b>Totals</b>	<b>216</b>	<b>0.3%</b>	<b>79,994</b>	<b>99.7%</b>	<b>80,210</b>	<b>2,858</b>	<b>0.2%</b>	<b>1,353,992</b>	<b>99.8%</b>	<b>1,356,850</b>

Source: 01/01/2015-12/31/2017 Bank Data

## State Rating

### State of Nevada

<b>CRA rating for Nevada:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>Satisfactory</b>
<b>The community development test is rated:</b>	<b>Needs to Improve</b>

The major factors that support this rating include:

- The overall geographic distribution of loans reflects reasonable dispersion in low- and moderate-income (LMI) census tracts.
- The overall borrower distribution of loans by income level of the borrower reflects reasonable penetration of borrowers of different income levels.
- The level of CD activities Needs to Improve in relation to the bank's performance context, and reflects poor responsiveness to AA needs.

### Description of Bank's Operations in Nevada

FBB has one AA, Washoe County, in the Reno-Sparks NV MSA within the state of Nevada. FBB provides products and services in the AA through one branch, which is located in a middle-income geography. While FBB does offer its full array of products and services to the this AA, they maintain limited staff at this location with the majority of their employees being located in the San Antonio, TX branch.

Based on FDIC Deposit Market Share data as of June 30, 2017, FBB had \$1 thousand in deposits in Nevada, which represented less than 0.1 percent of the bank's total deposits. The bank ranks 15th out of 16 depository financial institutions in the AA. The bank made 0.06 percent of its total evaluation period loans in Nevada. Though the bank has limited activity in this AA, this is more due to the bank's unique business model than a true failure to meet the needs of this community. With the bank being mostly a non brick and mortar institution and targeting a national customer base, it makes intuitive sense that they would not have a significant concentration in any one MSA, including its own AAs.

Refer to the community profiles for the state of Nevada in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review. Additional information can also be found in the Description of Institution section of this report.

### Scope of Evaluation in Nevada

The Reno-Sparks NV MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. To reach our conclusion, we performed a lending test on loans generated or purchased in this AA, as well as a community development test. The lending test

consisted of a test of bank loans against both geographical information and consumer characteristics in the AA, accounting for performance context. The community development test consisted of a review of applicable loans, investments, and services within the AA.

Ratings are primarily based on results of the full-scope area. Please see Appendix A for more information.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEVADA**

### **LENDING TEST**

FBB's performance under the lending test is reasonable. When applicable, more weight was placed on consumer loans originated or purchased inside the AA. As only 3 loans were originated in 2015 and 2016 which would not render a meaningful analysis, more emphasis was placed on results from 2017.

FBB's dispersion of loans to borrowers of different incomes and businesses of different sizes is reasonable. Of the 17 loans FBB generated in 2017, 24 percent were to LMI individuals compared to 40 percent of LMI individuals in the AA. FBB's geographical distribution in this AA is reasonable. 29 percent of census tracts in the AA were designated as LMI in 2017, and 24 percent of FBB's loans were made to LMI tracts.

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

#### **Consumer Loans**

The distribution of the bank's consumer loans originated or purchased reflects reasonable penetration. In years 2015 through 2016, only 3 loans were originated for a dollar volume of \$99 thousand, and this was not enough to perform a meaningful analysis. In 2017, FBB originated 17 loans in this AA for a total volume of \$476 thousand. FBB's loans to LMI borrowers was within a reasonable range of actual characteristics. Refer to Tables V in the state of Nevada 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.

### **Geographic Distribution of Loans**

#### **Consumer Loans**

The distribution of the bank's consumer loans originated or purchased in LMI geographies reflects reasonable dispersion. As with the distribution of loans to different income levels, we were not able to perform a meaningful analysis of geographical distribution for the years 2015 and 2016 as only 3 loans were generated in the AA during those years. As such, we placed the most emphasis on 2017. The bank's geographical dispersion reasonably conformed to actual geographical characteristics in the county. 24 percent of the bank's loans were made to borrowers in LMI tracts, compared to 29 percent of LMI census tracts in the A. Refer to Tables U in the state of Nevada 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.

## **Responses to Complaints**

The bank did not receive any CRA related complaints during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

FBB's performance under the CD test is Needs to Improve. The level of CD activities demonstrates poor responsiveness to the needs of the community. The bank generated no new CD loans or investments in this AA over the evaluation period.

However, while the overall CD performance in this AA is in need of improvement, FBB does have CD activity in the area. FBB employees contributed 875 hours of eligible service during the evaluation. They also made \$38 thousand in qualified investments over the evaluation period. In addition, while FBB only had a minimal number of *new* CD investments, they do have \$455 thousand in existing qualifying investments.

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

FBB has provided a very poor level of CD loans in its AA. During the evaluation period, the bank originated no CD loans. There are relatively limited opportunities for CD lending in the AA.

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

FBB's performance in providing CD investment in the AA is poor. We considered the investment opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

During the evaluation period, the bank provided no new investments, six donations totaling \$38 thousand, and one prior period investment with a December 31, 2017 outstanding balance of \$454 thousand. The donations were made to organizations that offer community services to LMI individuals. The donations benefited programs that provide financial literacy to LMI students, jobs, and skills training to LMI individuals, and services to LMI families. The prior period investment is for an SBA Loan Fund, with a mission of promoting permanent job creation, retention, and/or improvement for low- or moderate-income individuals who are employed by small businesses. While not innovative or complex, these investments exhibited adequate responsiveness to the credit and CD needs in the AA. Although the donations represents adequate responsiveness, the bank's limited quantity and low volume of CD investments did negatively impact conclusions about the bank's performance in the AA.

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

FBB exhibited adequate responsiveness in providing CD services in the AA. During the evaluation period, the bank provided two qualified CD services, one of which was to an organization within its AA that consisted of 863 service hours. An FBB employee served in a leadership capacity with the organization, which promotes community services to LMI

individuals and various resources to LMI families in crisis situations. Additionally, FBB employees contributed 12 hours towards a continuing education award, for a total of 875 service hours in the AA.

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

The bank's level of CD activities demonstrates a poor responsiveness to the needs and opportunities in its AA. A community contact noted a need for affordable housing and financial education.

## State of Texas

<b>CRA rating for the Texas:</b>	<b>Satisfactory</b>
<b>The lending test is rated:</b>	<b>Satisfactory</b>
<b>The community development test is rated:</b>	<b>Satisfactory</b>

The major factors that support this rating include:

- The overall geographic distribution of loans reflects reasonable dispersion in low- and moderate-income (LMI) census tracts.
- The overall borrower distribution of loans by income level of the borrower reflects reasonable penetration of borrowers of different income levels.
- The level of CD activities is satisfactory in relation to the bank's performance context, and reflects adequate responsiveness to AA needs.

## Description of Bank's Operations in Texas

FBB has one AA, the San Antonio TX MSA, which is comprised of Bexar County within the state of Texas. FBB provides products and services in the AA through one branch, which is located in middle-income geography.

Based on FDIC Deposit Market Share data as of June 30, 2017, FBB had over \$649.2 million in deposits in Texas, which represented 99.9 percent of the bank's total deposits. The bank ranks 13th out of 41 depository financial institutions in the AA. The bank made 0.21 percent of its total evaluation period loans in Texas.

Refer to the community profiles for the state of Texas in Appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

## Scope of Evaluation in Texas

The San Antonio TX MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. To reach our conclusion, we performed a lending test on loans generated or purchased in this AA, as well as a community development test. The lending test consisted of a test of bank loans against both geographical information and consumer characteristics in the AA, accounting for performance context. The community development test consisted of a review of applicable loans, investments, and services within the AA.

Ratings are primarily based on results of the full-scope area. Please see appendix A for more information.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS**

### **LENDING TEST**

FBB's performance under the lending test is satisfactory. When applicable, more weight was placed on consumer loans originated or purchased inside the AA. Additionally, more weight was also placed on years 2015 through 2016, as these loans represent the largest percentage of the number of loans in the evaluation period.

Overall lending test results were based on an analysis of the distribution to borrowers of different incomes and businesses of different sizes, as well as an analysis on the distribution to borrowers in different geographies. For both geography and income tests, we found that FBB's performance was reasonable and indicative of reasonable performance overall.

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

#### **Consumer Loans**

The distribution of the bank's consumer loans originated or purchased reflect reasonable penetration. In 2015-2016, 41 percent of households in the AA were LMI. 30 percent of the bank's loans during this time were to LMI individuals. In 2017, about 40 percent of households were LMI compared to about 24 percent of bank loans. While the bank's actual lending performance was lower than census tract characteristics, they were still within a reasonable range compared to actual household information. Refer to Tables V in the state of Texas 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.

### **Geographic Distribution of Loans**

#### **Consumer Loans**

The distribution of the bank's consumer loans originated or purchased in LMI geographies reflects reasonable dispersion. In 2015-2016, 32 percent of census tracts in the AA were LMI, compared to 28 percent of the bank's loans in the AA being LMI. While the bank had a lower percentage of loans in LMI tracts than the geographical characteristics, they were still within a reasonable range. However, 2017 results reflect poor geographical distribution. Only 6 percent of the bank's loans were made in LMI tracts compared to about 33 percent of census tracts being LMI in this AA. Overall, we concluded that the bank's geographical distribution was reasonable despite the results in 2017. While 2017 is a more recent time period, the bank generated more loans in 2015-2016, and more representative of lending during the evaluation period. Refer to Tables U in the state of Texas 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.

### **Responses to Complaints**

The bank did not receive any CRA related complaints during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

FBB exhibits adequate responsiveness to CD needs in this AA. The level of CD activities demonstrates adequate responsiveness to the needs of the community. Factors supporting this conclusion include an adequate record regarding qualified CD loans, and services, combined with adequate responsiveness to CD needs. The CD activities benefit LMI individuals or LMI geographic areas throughout the entire AA. Though overall responsiveness was adequate, the bank's level of CD investments was poor as there were no new CD investments during our evaluation period.

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

FBB has provided an adequate level of CD loans in its AA. During the evaluation period, the bank originated one CD loan totaling \$150 thousand. The loan was made to promote economic development in the bank's AA. CD loans exhibited adequate responsiveness to the identified community needs.

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

FBB's performance in providing CD investment in the AA is poor. We considered the investment opportunities with direct benefit within the AA, state, and region and the bank's capacity to address these needs.

During the evaluation period, the bank provided no new investments, 11 donations totaling \$195 thousand, and one prior period investment with a December 31, 2017 outstanding balance of \$545 thousand. The donations were made to organizations that offer community services to LMI individuals. The donations benefited programs that provide financial literacy to LMI students, jobs, and skills training to LMI individuals, and services to LMI families. The prior period investment is for a SBA Loan Fund, with a mission of promoting permanent job creation, retention, and/or improvement for low- or moderate-income individuals who are employed by small businesses.

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

FBB exhibits adequate responsiveness in providing CD services to this AA. During the evaluation period, the bank provided qualified CD services to 9 organizations within its AA that consisted of 782 service hours. FBB employees served in a leadership capacity with organizations. All services promote community services to LMI individuals and involved bank officers and personnel who presented financial literacy classes to LMI individuals, provided financial expertise as board members of organizations that target services to LMI individuals, supported organizations that provide jobs and skills training to LMI individuals, and various resources to LMI families in crisis situations.

## **Responsiveness to Community Development Needs**

The bank's level of CD activities demonstrates adequate responsiveness to the needs and opportunities in its AA. A community contact noted a need for affordable housing and financial education. During the evaluation period, the bank's officers and personnel provided needed services to LMI individuals.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): 01/01/15 to 12/31/17 Investment and Service Tests and CD Loans: 01/06/15 to 12/31/17	
<b>Bank</b>	<b>Products Reviewed</b>	
Farm Bureau Bank (FBB) Sparks, NV	Auto, Consumer, Credit Card loans; and CD loans; Qualified Investments; and CD Services.	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
State of Nevada Reno-Sparks NV MSA	Full-Scope	Washoe County
State of Texas San Antonio TX MSA	Full-Scope	Bexar County

# Appendix B: Summary of State Ratings

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RATINGS FARM BUREAU BANK			
Overall Bank:	Lending Test Rating	Community Development Test Rating	Overall Bank/State Rating
Farm Bureau Bank	Satisfactory	Satisfactory	Satisfactory
<b>State:</b>			
State of Nevada	Satisfactory	Needs to Improve	Satisfactory
State of Texas	Satisfactory	Satisfactory	Satisfactory

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

### State of Nevada

#### Reno-Sparks NV MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Reno-Sparks NV MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	112	8.9	17.9	36.6	30.4	6.3
Population by Geography	435,019	8.6	19.1	41.3	29.6	1.4
Housing Units by Geography	186,481	9.8	19.9	38.9	30.3	1.1
Owner-Occupied Units by Geography	94,470	2.7	12.7	43.6	40.6	0.4
Occupied Rental Units by Geography	71,875	18.2	29.3	35.1	15.6	1.8
Vacant Units by Geography	20,136	13.1	19.8	29.8	34.8	2.5
Businesses by Geography	24,468	9.1	26.0	27.5	31.6	5.8
Farms by Geography	525	5.9	15.6	38.5	37.9	2.1
Family Distribution by Income Level	102,630	21.1	17.2	20.6	41.0	0.0
Household Distribution by Income Level	166,345	24.6	15.7	17.5	42.1	0.0
Median Family Income MSA - 39900 Reno, NV MSA		\$65,722	Median Housing Value			\$219,183
			Median Gross Rent			\$945
			Families Below Poverty Level			10.0%
<i>Source: 2015 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FBB has one AA in the state of Nevada which meets the requirements of the regulation. The Reno-Sparks MSA is located along the northwest region of Nevada. The bank's AA is comprised of the entire Washoe County in the MSA. There are 112 CTs in Washoe County, and within the county there are a total of 10 low-, 20 moderate-, 41 middle-, 34 upper-income CTs, along with seven CTs that have no income designations. FBB currently has one office in the AA, with less than 0.1 percent of the bank's total deposits are located in Washoe County.

According to the 2015 U.S. Census American Community Survey, the AA population totals 435,019. The distribution of families by income level is 21.1 percent low-income, 17.2 percent moderate-income, 20.6 percent middle-income, and 41.0 percent upper-income. The percentage of families in the AA living below the poverty level is high at

10.0 percent at the 2010 U.S. Census. The 2017 FFIEC adjusted MFI for the AA is \$68,100. Low-income families in the AA, earn median annual income of \$34,050 or less, and moderate-income families earn an annual income of \$34,051 to \$54,480.

According to the June 30, 2018 FDIC Summary of Deposits Report, the bank's deposits total \$1 thousand. The bank ranks 15th out of 16 depository financial institutions in the AA, with a less than 0.1 percent market share. Competitors operate 84 branches in the AA and include large interstate banks, regional banks, savings banks, and community banks. The top five depository institutions account for 84.97 percent of total deposits in the AA. The top five depository institutions include Wells Fargo Bank National Association, Bank of America National Association, US Bank National Association, ZB National Association, and Western Alliance Bank.

### Employment and Economic Factors

According to the U.S. Bureau of Labor Statistics, unemployment in this AA is 3.9 percent, which is lower than the nationwide and Nevada unemployment rates as of December 2017. The nationwide and Nevada unemployment rates are 4.1 percent and 4.9 percent, respectively.

According to Moody's Analytics, Reno's economy is outperforming Nevada and the West in nearly all key gauges. The metro area is benefitting on new manufacturing and distribution operations thanks to the buildup at and near Tesla's Gigafactory. Leisure and hospitality has paused following strong growth, but other private services, notably professional and business services, are making up the slack. A thriving job market and ballooning business investment are drawing more workers into the labor force, which has grown. The unemployment rate has dipped to 3.9 percent, indicating that the labor market is still capable of absorbing new entrants. An increasing job market and household formation that is twice the U.S. average has lifted the housing market. Demand for single-family housing is rising much faster than supply, lifting house prices as builders contend with labor shortages.

Major employers include University of Nevada-Reno, Renown Health, Tesla, Inc., Peppermill Hotel Casino-Reno, and Grand Sierra Hotel & Casino.

# State of Texas

## San Antonio, TX MSA

Table A – Demographic Information of the Assessment Area						
Assessment Area: San Antonio, TX MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	366	9.0	35.8	25.1	29.0	1.1
Population by Geography	1,825,502	7.4	34.0	27.7	30.9	0.0
Housing Units by Geography	675,208	7.1	33.9	27.9	31.0	0.0
Owner-Occupied Units by Geography	361,851	5.3	27.8	27.5	39.4	0.0
Occupied Rental Units by Geography	256,980	8.7	41.0	28.8	21.5	0.0
Vacant Units by Geography	56,377	11.3	41.1	26.7	21.0	0.0
Businesses by Geography	110,654	5.3	24.7	28.2	41.4	0.3
Farms by Geography	2,195	3.2	20.1	28.2	48.3	0.1
Family Distribution by Income Level	419,295	24.1	17.7	19.3	39.0	0.0
Household Distribution by Income Level	618,831	25.6	16.3	18.0	40.1	0.0
Median Family Income MSA - 41700 San Antonio-New Braunfels, TX MSA		\$62,228	Median Housing Value			\$146,871
			Median Gross Rent			\$893
			Families Below Poverty Level			13.8%
<i>Source: 2015 ACS Census and 2017 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

FBB has one AA in the state of Texas which meets the requirements of the regulation. The San Antonio MSA is located south-central area of Texas. The bank's AA is comprised of the entire Bexar County in the MSA. There are 366 CTs in Bexar County, within the county there are a total of 33 low-, 131 moderate-, 92 middle-, 106 upper-income CTs, and four CTs that have no income designations. FBB currently has one office in the AA, with 99.9 percent of the bank's total deposits are located in Bexar County.

According to the 2015 U.S. Census American Community Survey, the AA population totals 1.82 million. The distribution of families by income level is 24.1 percent low-income, 17.7 percent moderate-income, 19.3 percent middle-income, and 39.0 percent upper-income. The percentage of families in the AA living below the poverty level is high at 13.8 percent at the 2010 U.S. Census. The 2017 FFIEC adjusted MFI for the AA is

\$64,300. Low-income families in the AA, earn median annual income of \$32,150 or less, and moderate-income families earn an annual income of \$32,151 to \$51,440.

According to the June 30, 2018 FDIC Summary of Deposits Report, the bank's deposits total \$649.2 million, making this AA the bank's largest AA, in terms of deposits held. The bank ranks 13th out of 41 depository financial institutions in the AA, with a 0.62 percent market share. Competitors operate 296 branches in the AA and include large interstate banks, regional banks, savings banks, and community banks. The top five depository institutions account for 87.85 percent of total deposits in the AA. The top five depository institutions include USAA Federal Savings Bank, Frost Bank, Citibank, National Association, Bank of America National Association, and Wells Fargo Bank National Association.

### Employment and Economic Factors

According to Moody's, unemployment in this AA is 3.4 percent, which is in line with nationwide and Texas unemployment rates as of December 2017. The nationwide and Texas unemployment rate is 4.1 percent and 4.0 percent, respectively.

According to Moody's Analytics, job growth in San Antonio has been moderately above the national rate. However, the pace has been uneven, with construction and distribution much faster than average and most other industries underperforming. In particular, federal civilian employment has actually declined from 2017. The unemployment rate remains low amid solid growth in the labor force.

Major employers include Joint Base San Antonio, H-E-B, USAA, Methodist Healthcare System, Baptist Health System, JP Morgan Chase, and Wells Fargo.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate MAs are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which result from how they are generated in supervisory analytical systems.

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

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

**Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** – The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s AA.

**Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.

**Table U. Assessment Area Distribution of Consumer 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 households throughout those geographies.

**Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – 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 households by income level in each MA/AA.

# State of Nevada

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-16**

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Reno-Sparks MSA	1	17	100.0	10.6	0	29.7	0	21.2	0	33.4	100.0	5.2	0
<b>Total</b>	<b>1</b>	<b>17</b>	<b>100.0</b>	<b>10.6</b>	<b>0</b>	<b>29.7</b>	<b>0</b>	<b>21.2</b>	<b>0</b>	<b>33.4</b>	<b>100.0</b>	<b>5.2</b>	<b>0</b>

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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017**

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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Reno-Sparks MSA	0	0	0	9.1	0	26.0	0	27.5	0	31.6	0	5.8	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>9.1</b>	<b>0</b>	<b>26.0</b>	<b>0</b>	<b>27.5</b>	<b>0</b>	<b>31.6</b>	<b>0</b>	<b>5.8</b>	<b>0</b>

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

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2015-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Reno-Sparks MSA	1	17	100.0	15,074	80.4	100.0	40.9	7.4	0	12.2	0
<b>Total</b>	<b>1</b>	<b>17</b>	<b>100.0</b>	<b>15,074</b>	<b>80.4</b>	<b>100.0</b>	<b>40.9</b>	<b>7.4</b>	<b>0</b>	<b>12.2</b>	<b>0</b>

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

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2017**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Reno-Sparks MSA	0	0	0	15,074	80.3	0	40.9	7.5	0	12.2	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>15,074</b>	<b>80.3</b>	<b>0</b>	<b>40.9</b>	<b>7.5</b>	<b>0</b>	<b>12.2</b>	<b>0</b>

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

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2015-16**

Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Reno-Sparks MSA	1	11	100.0	6.3	0	19.7	0	30.5	100	41.5	0	1.9	0
<b>Total</b>	<b>1</b>	<b>11</b>	<b>100.0</b>	<b>6.3</b>	<b>0</b>	<b>19.7</b>	<b>0</b>	<b>30.5</b>	<b>100</b>	<b>41.5</b>	<b>0</b>	<b>1.9</b>	<b>0</b>

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

**Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography** **2017**

Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Reno-Sparks MSA	0	0	--	5.9	0	15.6	0	38.5	0	37.9	0	2.1	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>--</b>	<b>5.9</b>	<b>0</b>	<b>15.6</b>	<b>0</b>	<b>38.5</b>	<b>0</b>	<b>37.9</b>	<b>0</b>	<b>2.1</b>	<b>0</b>

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

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2015-16**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Reno-Sparks MSA	1	11	100.0	27	93.5	100.0	48.1	4.3	0	2.2	0
<b>Total</b>	<b>1</b>	<b>11</b>	<b>100.0</b>	<b>27</b>	<b>93.5</b>	<b>100.0</b>	<b>48.1</b>	<b>4.3</b>	<b>0</b>	<b>2.2</b>	<b>0</b>

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

**Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** **2017**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Reno-Sparks MSA	0	0	0	27	93.3	0	48.1	4.6	0	2.1	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>27</b>	<b>93.3</b>	<b>0</b>	<b>48.1</b>	<b>4.6</b>	<b>0</b>	<b>2.1</b>	<b>0</b>

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

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2015-16**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Reno-Sparks MSA	3	99	100.0	10.5	0	24.3	0	32.6	66.7	32.7	33.3	0.0	0
<b>Total</b>	<b>3</b>	<b>99</b>	<b>100.0</b>	<b>10.5</b>	<b>0</b>	<b>24.3</b>	<b>0</b>	<b>32.6</b>	<b>66.7</b>	<b>32.7</b>	<b>33.3</b>	<b>0.0</b>	<b>0</b>

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

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2017**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Reno-Sparks MSA	17	476	100.0	9.4	11.8	19.9	11.8	39.9	47.1	29.8	29.4	1.0	0
<b>Total</b>	<b>17</b>	<b>476</b>	<b>100.0</b>	<b>9.4</b>	<b>11.8</b>	<b>19.9</b>	<b>11.8</b>	<b>39.9</b>	<b>47.1</b>	<b>29.8</b>	<b>29.4</b>	<b>1.0</b>	<b>0</b>

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

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** **2015-16**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Reno-Sparks MSA	3	99	100.0	22.9	0	17.0	33.3	18.6	0	41.5	66.7	0.0	0
<b>Total</b>	<b>3</b>	<b>99</b>	<b>100.0</b>	<b>22.9</b>	<b>0</b>	<b>17.0</b>	<b>33.3</b>	<b>18.6</b>	<b>0</b>	<b>41.5</b>	<b>66.7</b>	<b>0.0</b>	<b>0</b>

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

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** **2017**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Reno-Sparks MSA	17	476	100.0	24.6	4.8	15.7	19.0	17.5	19.0	42.1	57.1	0.0	0
<b>Total</b>	<b>17</b>	<b>476</b>	<b>100.0</b>	<b>24.6</b>	<b>4.8</b>	<b>15.7</b>	<b>19.0</b>	<b>17.5</b>	<b>19.0</b>	<b>42.1</b>	<b>57.1</b>	<b>0.0</b>	<b>0</b>

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

# State of Texas

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2015-16**

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
San Antonio MSA	2	182	100.0	5.6	50.0	20.3	0	28.7	0	45.0	50.0	0.4	0
<b>Total</b>	<b>2</b>	<b>182</b>	<b>100.0</b>	<b>5.6</b>	<b>50.0</b>	<b>20.3</b>	<b>0</b>	<b>28.7</b>	<b>0</b>	<b>45.0</b>	<b>50.0</b>	<b>0.4</b>	<b>0</b>

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

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017**

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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
San Antonio MSA	0	0	--	5.0	0.0	20.1	0.0	30.0	0.0	44.5	0.0	0.4	0.0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>--</b>	<b>5.0</b>	<b>0.0</b>	<b>20.1</b>	<b>0.0</b>	<b>30.0</b>	<b>0.0</b>	<b>44.5</b>	<b>0.0</b>	<b>0.4</b>	<b>0.0</b>

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

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2015-16**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
San Antonio MSA	2	183	100.0	31,723	83.1	50.0	40.4	6.0	50.0	10.9	0
<b>Total</b>	<b>2</b>	<b>183</b>	<b>100.0</b>	<b>31,723</b>	<b>83.1</b>	<b>50.0</b>	<b>40.4</b>	<b>6.0</b>	<b>50.0</b>	<b>10.9</b>	<b>0</b>

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

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2017**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
San Antonio MSA	0	0	--	31,723	83.5	0.0	40.4	6.0	0.0	10.5	0.0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>--</b>	<b>31,723</b>	<b>83.5</b>	<b>0.0</b>	<b>40.4</b>	<b>6.0</b>	<b>0.0</b>	<b>10.5</b>	<b>0.0</b>

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

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2015-16**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
San Antonio MSA	29	659	100.0	7.1	0	25.3	27.6	31.3	37.9	36.3	34.5	0.0	0
<b>Total</b>	<b>29</b>	<b>659</b>	<b>100.0</b>	<b>7.1</b>	<b>0</b>	<b>25.3</b>	<b>27.6</b>	<b>31.3</b>	<b>37.9</b>	<b>36.3</b>	<b>34.5</b>	<b>0.0</b>	<b>0</b>

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

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2017**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
San Antonio MSA	17	493	100.0	6.2	0	26.3	5.9	31.9	35.3	35.5	58.8	0.0	0
<b>Total</b>	<b>17</b>	<b>493</b>	<b>100.0</b>	<b>6.2</b>	<b>0</b>	<b>26.3</b>	<b>5.9</b>	<b>31.9</b>	<b>35.3</b>	<b>35.5</b>	<b>58.8</b>	<b>0.0</b>	<b>0</b>

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2015-16	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
San Antonio MSA	29	659	100.0	24.7	10.0	16.0	20.0	17.2	23.3	42.2	46.7	0.0	0	
<b>Total</b>	<b>29</b>	<b>659</b>	<b>100.0</b>	<b>24.7</b>	<b>10.0</b>	<b>16.0</b>	<b>20.0</b>	<b>17.2</b>	<b>23.3</b>	<b>42.2</b>	<b>46.7</b>	<b>0.0</b>	<b>0</b>	

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2017	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
San Antonio MSA	17	493	100.0	24.6	5.9	15.8	17.6	17.6	5.9	41.9	70.6	0.0	0	
<b>Total</b>	<b>17</b>	<b>493</b>	<b>100.0</b>	<b>24.6</b>	<b>5.9</b>	<b>15.8</b>	<b>17.6</b>	<b>17.6</b>	<b>5.9</b>	<b>41.9</b>	<b>70.6</b>	<b>0.0</b>	<b>0</b>	

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