



## **PUBLIC DISCLOSURE**

December 2, 2019

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Crockett National Bank  
Charter Number 17828

8018 Broadway Street, Suite 200  
San Antonio, TX 78209

Office of the Comptroller of the Currency  
San Antonio Field Office  
10001 Reunion Place, Suite 250  
San Antonio, TX 78216-4165

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

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## **Overall CRA Rating**

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

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

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

The lending test rating is based primarily on the bank's performance in the full-scope review assessment area (AA), the San Angelo AA. The bank's performance in the limited-scope review AAs was evaluated to determine if the performance impacted the overall rating.

The community development (CD) test rating is based primarily on the bank's performance in the full-scope review AA, the San Angelo AA. The bank's performance in the limited-scope review AAs was evaluated to determine if performance impacted the overall rating.

The major factors that support the overall rating include:

- The bank's loan-to-deposit (LTD) ratio is more than reasonable.
- A majority of the bank's loans are inside its AAs.
- The bank exhibits a reasonable geographic distribution of loans.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels.
- The bank exhibits adequate responsiveness to CD needs, considering the bank's capacity and the need and availability of CD opportunities in the AAs.

### **Loan-to-Deposit Ratio**

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable.

During the evaluation period, Crockett had a quarterly average LTD ratio of 117 percent and ranged from a low of 101 percent to a high of 132 percent. The LTD ratio is calculated at the bank, rather than the AA, level. To assess the bank's performance, we compared its quarterly average ratio to five institutions similarly situated to Crockett in asset size and with offices inside the bank's AAs. The quarterly average LTD ratio for the five institutions was 61 percent and ranged from a low of 18 percent to a high of 86 percent.

### **Lending in Assessment Area**

A majority of the bank's loans are inside its AAs. The bank originated and purchased 55 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										
2016	44	52	41	48	85	11,163	44	14,148	56	25,341
2017	74	67	36	33	110	22,394	52	20,688	48	43,082
2018	41	43	54	57	95	9,266	27	24,512	73	33,779
<b>Total</b>	<b>159</b>	<b>55</b>	<b>131</b>	<b>45</b>	<b>290</b>	<b>42,823</b>	<b>42</b>	<b>59,378</b>	<b>58</b>	<b>102,202</b>

*Source: Evaluation Period: 1/1/2016 – 12/31/2018 Bank Data; due to rounding, totals may not equal 100.*

## Description of Institution

Crockett National Bank (Crockett), an intrastate financial institution, is wholly-owned by Crockett County National Bancshares, Inc., a one-bank holding company. The bank and the holding company are headquartered in San Antonio, Texas. Crockett has six offices; two in San Antonio; two in San Angelo, one in College Station, and one in Ozona. The bank considers one of the San Angelo locations as its main office. Crockett also has loan production offices in San Antonio, Austin, and New Braunfels. The bank has two automated teller machines (ATMs); one at the San Angelo motor bank and one at the San Antonio Broadway office.

In February 2017, Crockett closed its branch in Austin and opened a loan production office there the same month. Crockett opened its College Station branch in December 2018. We did not include the College Station AA in this evaluation because a meaningful analysis of performance could not be performed due to the limited time as an AA. Crockett has not engaged in any merger or acquisition activities since the previous evaluation.

During the evaluation period, Crockett had four assessment areas (AAs), the San Angelo AA, the San Antonio AA, the Austin AA, and the Ozona AA. The San Angelo AA includes all of Tom Green County, which is part of the San Angelo, Texas MSA. The San Antonio AA includes all of Bexar County and all of Comal County; both part of the much larger San Antonio-New Braunfels, Texas MSA. The Austin AA includes all of Travis County, which is part of the Austin-Round Rock, Texas MSA. The Ozona AA includes all of Crockett County, which is not part of any MSA.

As of December 31, 2018, Crockett had total assets of \$643 million. Net loans totaled \$561 million or 87 percent of total assets. By dollar volume, commercial loans, including commercial real estate, comprised 38 percent of the loan portfolio; 1 to 4 residential real estate comprised 33 percent, and farmland loans comprised 28 percent. Consumer loans comprised a negligible less than 1 percent of the loan portfolio. Tier 1 capital totaled \$72 million. Total assets averaged \$639.6 million during the quarter resulting in a Tier 1 leverage ratio of 11.4 percent.

Crockett offers traditional loan and deposit products and services. Customers can access the bank's website ([www.crockettnationalbank.com](http://www.crockettnationalbank.com)) and a 24-hour telephone banking service for balance inquiries and rate information; and to transfer funds between accounts, make loan payments, and pay bills.

Based on its financial condition and size, there are no legal or financial factors that inhibit the bank's ability to meet credit needs in its AAs. Crockett's business strategy throughout the evaluation period focused on offering residential loans as its primary loan product. The prior CRA examination, dated November 26, 2016, assigned an overall rating of Satisfactory to Crockett's CRA performance.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

We used interagency intermediate small bank CRA examination procedures to evaluate bank performance. The procedures include a lending test and a CD test. The lending test evaluates the bank's record of meeting the credit needs in its AAs; and the CD test evaluates the bank's responsiveness to CD needs in its AAs. The evaluation period for this examination is from January 1, 2016 through December 31, 2018.

The lending test covers home mortgage disclosure act (HMDA) reported residential mortgage loans. For CRA analytical purposes, the American Community Survey (ACS) demographics replaced the decennial census demographics. To evaluate the distribution of loans, we used the ACS demographics related to the calendar year evaluated. We used 2006-2010 ACS demographics to analyze data related to calendar year 2016; and 2011-2015 ACS demographics to analyze data related to calendar years 2017 and 2018. In October 2019, we tested HMDA data for calendar years 2016, 2017, and 2018 to verify the accuracy of reported data and found it reliable to use for this evaluation.

For the CD test, we verified information bank management provided to us for CD loans, investments, and CD services to ensure it met the regulatory definition of CD. We excluded any item that did not meet the definition or purpose of CD from our analysis.

### **Selection of Areas for Full-Scope Review**

In each state where a bank has an office, one or more AAs within that state are selected for a full-scope review. For evaluation purposes, 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. The combined AAs may be evaluated as full- or limited-scope.

Crockett operates only in the state of Texas. We selected one of its four AAs for a full-scope review and completed limited-scope reviews for the remaining three AAs. Refer to the "Scope" section under State Rating for details regarding how the full-scope AA was 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 ratings, and where applicable, multistate ratings. Crockett operates in only one state. We based the overall rating primarily on the bank's performance in the full-scope review AA and determined if the performance in the limited-scope review AAs impacted the overall rating.

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

## **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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution 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 Texas

**CRA rating for the State of Texas:** Satisfactory

**The Lending Test is rated:** Satisfactory

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

The lending test rating is based primarily on the bank's performance in the full-scope review assessment area (AA), the San Angelo AA. The bank's performance in the limited-scope review AAs was evaluated to determine if the performance impacted the overall rating.

The CD test rating is based primarily on the bank's performance in the full-scope review AA, the San Angelo AA. The bank's performance in the limited-scope review AAs was evaluated to determine if performance impacted the overall rating.

The major factors that support the overall rating include:

- The bank's LTD ratio is more than reasonable.
- A majority of the bank's loans are inside its AAs.
- The bank exhibits a reasonable geographic distribution of loans.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels.
- The bank exhibits adequate responsiveness to CD needs, considering the bank's capacity and the need and availability of CD opportunities in the AAs.

### Description of Institution's Operations in Texas

As previously noted, Crockett operates only in Texas. It has six offices and two ATMs. At June 30, 2019, Crockett had total deposits of \$448 million. Based on the FDIC's Summary of Deposits for the same date, 73 percent of the deposits are in the San Angelo AA, 14 percent are in the Ozona AA, 11 percent are in the San Antonio AA, and 2 percent are in the College Station AA.

Crockett faces strong competition in its AAs. Market share reports reflect the following information:

- In the San Angelo AA, there are 15 financial institutions with 29 branches in the AA. Crockett ranks third with a 13 percent market share of deposits; First Financial Bank, N.A. ranks first with a 26 percent market share.
- In the San Antonio AA, there are 49 financial institutions with 329 branches in the AA. Crockett ranks 30<sup>th</sup> with a 0.05 percent market share; USAA Federal Savings Bank ranks first with a 67.5 percent market share.
- In the Austin AA, there are 52 financial institutions with 329 branches in the AA. Crockett closed its Austin branch in February 2017 and is not ranked; Wells Fargo Bank, N.A. is ranked 1<sup>st</sup> with a 20 percent market share.

- In the Ozona AA, there are 2 financial institutions with 3 branches in the AA. Crockett is ranked second with a 36 percent market share; Ozona National Bank ranks first with a 64 percent market share.

We reviewed five recently prepared community contact forms; one in the San Angelo AA; two in the San Antonio AA, and two in the Austin AA. The contact in the San Angelo AA said the biggest need was affordable housing and business loans. The contacts in the San Antonio AA also mentioned affordable housing, as well as revitalization/stabilization (especially in the inner city downtown), and financial literacy as needs. The Austin AA contacts said affordable housing was the biggest need.

### San Angelo Assessment Area

The San Angelo AA is comprised of Tom Green County; one of two counties in the San Angelo, TX MSA. The AA has 25 census tracts (CTs) - one low-income, seven moderate-income, ten middle-income, six upper-income, and one with no income designation (location of San Angelo airport). The AA meets regulatory requirements, does not reflect discrimination, and does not arbitrarily exclude any low- or moderate-income (LMI) geographies. The city of San Angelo is the county seat for Tom Green County.

Crockett has two branches and a motor bank with an ATM in San Angelo; the main office in a moderate-income CT and a branch in an upper-income CT. The motor bank is in an upper-income CT across the street from the main office.

The city of San Angelo is a highly competitive banking environment that includes large regional and national banks, and smaller community banks. The FDIC's June 30, 2019 Deposit Market Share Report reflects 15 financial institutions operate 29 offices within Tom Green County. Crockett ranks third with a deposit market share of 13 percent First Financial Bank, NA ranks first with a 26 percent deposit market share.

According to the US Bureau of Labor Statistics, the seasonally-adjusted unemployment rate for the nation was 3.9 percent as of December 2018, while the unemployment rate for the state of Texas was 3.7 percent. The Tom Green County unemployment rate of 2.8 percent is lower than both the Texas and national unemployment rates.

Services that include, but are not limited to, education, health care, social assistance, food services, recreation, and administrative, represent the largest industry in the AA at 39 percent; followed by retail trade with 14 percent. Of the 6,912 total businesses in the AA, 85 percent are single location businesses with 65 percent of the businesses reporting four or fewer employees; and 80 percent reporting annual revenue less than \$1 million.

The September 2019 Moody's Analytics report reflects San Angelo's economy is cooling. Nonfarm job growth is still near 1 percent, but it has been volatile in 2019 and lags the Texas and U.S. averages. Sharp declines in professional/business services and slippage in mining are behind the slowdown. However, most other private industries and the public sector continue to grow. Oil and gas production continue to rise in the nearby Permian Basin. Well completions are up, but drilling is down and weaker demand for oil field services is taking a toll on industry employment, where more than three-fourths of mining jobs are in support activities. An expanding healthcare industry will help support the local economy. Since there are no other large municipalities within a 90-mile radius, San Angelo serves as a regional healthcare hub. Healthcare providers account for three of the top five employers in San Angelo; the other two are Goodfellow Air Force Base and Angelo State University.

The following tables reflect pertinent demographic information about the AA for the 2016 and 2017-2018 evaluation periods.

<b>2016 Demographic Information for San Angelo Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	25	4.0	28.0	40.0	24.0	4.0
Population by Geography	110,224	2.4	30.4	43.2	24.1	0.0
Housing Units by Geography	46,027	2.0	28.8	43.1	26.1	0.0
Owner-Occupied Units by Geography	28,134	1.3	26.2	45.3	27.2	0.0
Occupied Rental Units by Geography	13,330	3.0	34.7	36.2	26.2	0.0
Vacant Units by Geography	4,563	3.6	27.5	49.4	19.5	0.0
Businesses by Geography	6,998	11.9	15.4	44.9	27.4	0.4
Farms by Geography	415	6.7	7.0	36.4	49.9	0.0
Family Distribution by Income Level	27,769	22.0	18.3	19.4	40.2	0.0
Household Distribution by Income Level	41,464	23.0	17.4	17.2	42.4	0.0
Median Family Income MSA - 41660 San Angelo, TX MSA		\$53,682	Median Housing Value			\$97,880
			Median Gross Rent			\$667
			Families Below Poverty Level			12.2%

*Source: 2010 U.S. Census and 2016 D&B Data; due to rounding, totals may not equal 100.0.*  
 (\*) The NA category consists of geographies that have not been assigned an income classification.

<b>2017-2018 Demographic Information for San Angelo Assessment Area</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	25	4.0	32.0	44.0	16.0	4.0
Population by Geography	115,056	2.3	28.2	51.0	18.5	0.0
Housing Units by Geography	47,367	2.4	28.7	49.1	19.7	0.0
Owner-Occupied Units by Geography	26,465	1.4	25.2	49.4	23.9	0.0
Occupied Rental Units by Geography	16,360	3.5	28.5	53.9	14.1	0.0
Vacant Units by Geography	4,542	4.0	50.1	30.3	15.6	0.0
Businesses by Geography	6,912	12.0	21.6	44.1	22.0	0.4
Farms by Geography	396	6.1	8.8	35.4	49.7	0.0
Family Distribution by Income Level	27,418	21.5	18.2	20.7	39.5	0.0
Household Distribution by Income Level	42,825	23.4	17.0	17.0	42.6	0.0
Median Family Income MSA - 41660 San Angelo, TX MSA		\$59,830	Median Housing Value			\$118,884
			Median Gross Rent			\$784
			Families Below Poverty Level			10.7%

*Source: 2015 ACS Census and 2018 D&B Data; due to rounding, totals may not equal 100.0.*  
 (\*) The NA category consists of geographies that have not been assigned an income classification.

## **Scope of Evaluation in Texas**

We selected the San Angelo AA for a full-scope review as 73 percent of total deposits and 41 percent of the total reported HMDA loans in the evaluation period originated in this AA. We completed limited-scope reviews on the remaining AAs. Refer to the table in appendix A for the list of all the AAs under review.

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

### **LENDING TEST**

The bank's performance under the lending test in Texas is rated Satisfactory.

Based on full- and limited-scope reviews, the bank's lending performance in the state of Texas is reasonable.

### **Distribution of Loans by Income Level of the Geography**

The bank exhibits a reasonable geographic distribution of loans in the state of Texas.

#### ***Home Mortgage Loans***

Refer to Table O 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.

In 2016, Crockett had excellent geographic distribution of mortgage loans in the San Angelo AA. It originated 28.6 percent of the loans in low-income census tracts; demographic data reflects only 1.3 percent of owner-occupied housing units are in these tracts. In addition, the bank originated 28.6 percent of the loans in moderate-income tracts. Demographic data reflects 26.2 percent of owner-occupied housing units are in moderate-income census tracts.

During the 2017–2018 evaluation period, Crockett had reasonable geographic distribution. It originated 13.7 percent of its mortgage loans in low-income census tracts in the San Angelo AA. Demographic data reflects only 1.4 percent of owner-occupied housing units are in low-income census tracts. The bank originated 11.8 percent of the loans in moderate-income tracts. Demographic data reflects 25.2 percent of owner-occupied housing units are in moderate-income census tracts.

### **Distribution of Loans by Income Level of the Borrower**

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

#### ***Home Mortgage Loans***

Refer to Table P 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.

In 2016, Crockett had reasonable distribution of mortgage loans to borrowers of different income levels in the San Angelo AA. It originated 14.3 percent of the loans to borrowers with low-income; demographic data reflects 22.0 percent of the families in the AA have low income. The bank originated 50.0 percent of the loans to borrowers with moderate-income. Demographic data reflects 18.3 percent of the families in the AA have moderate income.

During the 2017–2018 evaluation period, Crockett had reasonable distribution of mortgage loans to borrowers of different income levels in the San Angelo AA. It originated 15.7 percent of the loans to borrowers with low-income; demographic data reflects 21.5 percent of the families in the AA have low income. The bank originated 17.6 percent of the loans to borrowers with moderate-income. Demographic data reflects 18.2 percent of the families in the AA have moderate income.

### **Responses to Complaints**

Crockett did not receive any complaints related to its CRA or fair lending performance between November 28, 2016 (date of the previous CRA examination) and December 2, 2019 (date of the current CRA examination).

### **Conclusions for Areas Receiving Limited Scope Reviews**

Based on a limited-scope review, the bank’s performance under the lending test in the San Antonio AA is consistent with the bank’s overall performance under the lending test in the full scope area. Crockett had reasonable geographic distribution of loans and reasonable distribution of loans to borrowers of different income levels.

Based on limited-scope reviews, the bank’s performance under the lending test in the Austin AA and in the Ozona AA is weaker than the bank’s overall performance under the lending test in the full scope area. Crockett did not originate enough mortgage loans in the Austin AA during either evaluation period to perform meaningful analyses and did not originate any loans in the Ozona AA during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

The bank’s performance under the CD test in the state of Texas is rated Satisfactory.

Based on the full- and limited-scope reviews, the bank exhibits adequate responsiveness to CD needs through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for CD in the bank’s AAs.

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

During the evaluation period, the bank originated five qualifying CD loans totaling \$1.4 million in the full-scope review AA. The five loans were to related entities with similar mission of purchasing and renovating condominium and apartment complexes in Tom Green County to provide affordable housing to low- and moderate-income individuals. The five loans funded purchases of four condominium complexes and one apartment complex for a combined total of 148 rental units. One- and two-bedroom units are rented to low- and moderate-income families at rents considerably below market rent averages.

In addition, the bank partners with the Galilee Community Development Corporation (Galilee) to provide housing and to focus on neighborhood needs of low- and moderate-income families in San Angelo and the Concho Valley. Galilee works with local builders to revitalize blighted neighborhoods and to produce single-family and multi-family housing. During the evaluation period, the bank funded 16 single-family mortgage loans totaling \$1.25 million to individuals that qualified for Galilee's programs in the San Angelo AA. While these loans cannot be included in the CD test because they are single-family mortgage loans reported as HMDA loans and included in the lending test, these loans demonstrate Crockett's willingness to address CD needs.

### Number and Amount of Qualified Investments

During the evaluation period, qualified investments consisted solely of charitable donations that were targeted primarily to community services for low- and moderate-income individuals and families. Crockett made 80 donations totaling \$403.7 thousand to 30 different organizations in its AAs during the evaluation period. The bank had no qualifying debt or equity investments; nor did it have any prior period investments or unfunded commitments. The following table reflects the number and dollar volume of donations in each AA during the evaluation period.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$ (000's)	#	\$ (000's)	#	% of Total #	\$ (000's)	% of Total \$	#	\$ (000's)
San Angelo AA	0	0	29	42,810	29	36	42,810	11	0	0
San Antonio AA	0	0	49	348,925	49	61	348,925	86	0	0
Austin AA	0	0	2	12,000	2	3	12,000	3	0	0
Ozona AA	0	0	0	0	0	0	0	0	0	0
Totals	0	0	80	403,735	80	100	403,735	100	0	0

\* Investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Examples of qualified donations include:

- **Habitat for Humanity of San Angelo:** a locally-run affiliate of Habitat for Humanity International, a nonprofit organization with over 2,100 affiliates. Habitat works with partner families to build homes that provide safe, decent affordable housing. The homes are sold to the partner families with no profit added and financed with a zero-interest rate mortgage loan. Crockett made two donations totaling \$10 thousand during the evaluation period.
- **Galilee Community Development Corporation:** a nonprofit organization that serves as a major catalyst for CD initiatives. It focuses on housing and neighborhood needs of low- and moderate-income families in San Angelo and the Concho Valley. Galilee works with local builders to produce affordable housing targeted to low- and moderate-income families. Crockett made four donations totaling \$6.5 thousand during the evaluation period.
- **Business and Community Lenders of Texas (BCL):** BCL of Texas is a nonprofit economic development organization in the Austin AA. It provides lending, homeownership, entrepreneurship, and community development programs to fulfill its mission of building strong communities across Texas. BCL is a certified Community Development Financial Institution, an US SBA Certified

Development Corporation, a HUD Secondary Finance Lender, and a US SBA Micro Lender. Crockett made two donations totaling \$12 thousand during the evaluation period.

- **Alamo Community Group (ACC):** Nonprofit organization with a mission to develop, acquire, own, and manage affordable housing in the San Antonio-New Braunfels MSA. ACC is a chartered member of NeighborWorks America, a nationwide network of community developers and affordable housing organizations. Crockett made five donations totaling \$30 thousand during the evaluation period.
- **Mexican American Unity Council (MAUC):** It provides guidance, services, and resources in the areas of education, affordable housing, community, and economic development in San Antonio. Data reflects MAUC serviced 8,448 individuals annually and 89 percent of these individuals had annual household income less than \$15 thousand. Services provided include: GED (general educational development) and ESL (English as second language) classes; financial literacy; family literacy; nutrition and health wellness programs; and summer food programs for children. Crockett made five donations totaling \$15.7 thousand during the evaluation period.
- **LiftFund Inc.:** It is a designated Community Development Financial Institution operating in San Antonio with a mission to provide credit and other services to small businesses and entrepreneurs who do not have access to loans from commercial sources and to provide leadership and innovation to the microlending industry. Crockett made five donations totaling \$115 thousand during the evaluation period.
- **Our Casas Resident Council, Inc.:** This organization's mission is to develop and implement initiatives for the empowerment of low- and moderate-income families in San Antonio. It organizes, motivates, and assists low- and moderate-income families to move towards self-sufficiency and into the economic mainstream of homeownership. To fulfill its mission, it offers homebuyer education; housing counseling; mortgage foreclosure prevention, debt management and credit counseling workshops; acquisition and management of rental units; and the acquisition of land and development of affordable single-family housing units. Crockett made three donations totaling \$15 thousand during the evaluation period.

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

During the evaluation period, a bank officer served as a board member and offered financial expertise to a local organization that provides affordable housing for low- and moderate-income families. Job duties included review and approval of housing applications and builder packages; and assessing an increased need for housing, especially for low- and moderate-income families. Members of the mortgage bank team offer financial expertise by volunteering monthly as interviewers for a local community service group that helps low- and moderate-income individuals and families. The team members help applicants to identify their financial needs and prepare budgets. Bank officers and employees work with organizations that provide community services to low- and moderate-income individuals and families. Examples include organizations with programs to feed children during summer month when schools are not in session; and programs that feed elderly, homebound individuals.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope review, the bank's performance under the CD test in the San Antonio AA is stronger than the bank's overall performance under the CD test in the full-scope area. During the evaluation period, the bank concentrated many of its CD activities in this AA. Crockett's CD activities in this AA positively impact the bank's overall CD test rating.

- It originated three CD loans totaling \$8.6 million. Funds primarily used to renovate and revitalize old office buildings; and to help promote economic growth in downtown San Antonio. Once renovation

was completed, several new businesses opened, including one that employed over 200 individuals; a specialty grocery store; and a restaurant. The number and dollar volume of CD loans represents 38 percent and 86 percent respectively of total CD loans the bank in all its AAs during the evaluation period.

- It made 49 donations totaling \$349 thousand that supported affordable housing, economic development, and community service. The number and dollar volume of donations represents 61 percent and 86 percent respectively of total donations the bank made in all its AAs during the evaluation period.
- Bank officers provide financial expertise serving as board and committee members for several organizations, such as Comal County Habitat for Humanity, LiftFund, Mayor’s Housing Policy Task Force, National Association of Hispanic Real Estate Professionals, and the Local Initiatives Support Corporation. A bank officer also provides financial education through participation in workshops, speaking engagements, and classes held by several organizations including, but not limited to San Antonio Housing Authority, Alamo Community Group, and Mexican American Unity Council.

Based on limited-scope reviews, the bank’s performance under the CD test in the Austin AA is weaker than the bank’s overall performance under the CD test in the full-scope area. As noted earlier, Crockett closed the branch in this AA in February 2017.

- It did not originate any CD loans in this AA during the evaluation period.
- It made 2 donations totaling \$12 thousand to a non-profit organization focused on economic development. The number and dollar volume of the donations represents 2.5 percent and 3 percent respectively of total donations the bank in all its AAs during the evaluation period.
- The bank did not provide any CD services in this AA during the evaluation period.

Based on limited-scope reviews, the bank’s performance under the CD test in the Ozona AA is consistent with the bank’s overall performance under the CD test in the full-scope area.

## 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 MSA(s) and non-MSA(s) 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>	1/1/2016 to 12/31/2018	
<b>Bank Products Reviewed:</b>	Home mortgage loans Community development loans, qualified investments, community development services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	None	None
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Texas		
San Angelo AA	Full-scope	County of Tom Green; in MSA #41660
San Antonio AA	Limited-scope	Counties of Bexar and Comal; in MSA #41700
Austin AA	Limited-scope	County of Travis; in MSA #12420
Ozona AA	Limited-scope	County of Crockett; not in-MSA

## Appendix B: Summary of MMSA and State Ratings

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RATINGS: Crockett National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating*	Overall Bank/State Rating
Crockett National Bank	Satisfactory	Satisfactory	Satisfactory
State:			
Texas	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and the Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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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.

**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, 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-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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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.

**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 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

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### 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 are treated 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 30<sup>th</sup> 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 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. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm 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 in those geographies.
- Table V. Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
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
San Angelo AA	14	1,023	31.8	3,488	1.3	28.6	0.6	26.2	28.6	16.0	45.3	35.7	48.4	27.2	7.1	35.0	0.0	0.0	0.0
San Antonio AA	25	7,810	56.8	66,270	4.9	4.0	1.6	25.2	28.0	11.7	32.1	16.0	33.3	37.8	52.0	53.4	0.0	0.0	0.0
Austin AA	5	2,330	11.4	46,841	7.6	0.0	5.8	19.7	20.0	21.1	26.8	20.0	26.7	46.0	60.0	46.4	0.0	0.0	0.0
Ozona AA	0	0	0.0	38	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>44</b>	<b>11,163</b>	<b>100.0</b>	<b>116,637</b>	<b>5.6</b>	<b>11.4</b>	<b>3.3</b>	<b>23.4</b>	<b>27.3</b>	<b>15.6</b>	<b>31.0</b>	<b>22.7</b>	<b>31.1</b>	<b>40.0</b>	<b>38.6</b>	<b>50.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2006-2010 ACS Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017 - 2018
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
San Angelo AA	51	10,034	44.3	2,690	1.4	13.7	0.7	25.2	11.8	14.5	49.4	43.1	51.4	23.9	31.4	33.4	0.0	0.0	0.0
San Antonio AA	50	14,599	43.5	62,326	4.8	12.0	1.3	26.1	24.0	14.4	27.7	16.0	31.9	41.3	48.0	52.4	0.0	0.0	0.0
Austin AA	14	7,027	12.2	41,674	6.2	7.1	6.2	18.6	14.3	18.2	29.9	35.7	33.4	45.0	42.9	41.9	0.3	0.0	0.4
Ozona AA	0	0	0.0	25	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	100.0	0.0	100.0	0.0	0.0	0.0
<b>Total</b>	<b>115</b>	<b>31,660</b>	<b>100.0</b>	<b>106,715</b>	<b>5.2</b>	<b>12.2</b>	<b>3.2</b>	<b>23.4</b>	<b>17.4</b>	<b>15.9</b>	<b>29.3</b>	<b>30.4</b>	<b>33.0</b>	<b>42.0</b>	<b>40.0</b>	<b>47.8</b>	<b>0.1</b>	<b>0.0</b>	<b>0.2</b>

Source: 2011-2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 and 2018 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
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
San Angelo AA	14	1,023	31.8	3,488	22.0	14.3	4.2	18.3	50.0	12.4	19.4	21.4	19.6	40.2	0.0	40.1	0.0	14.3	23.6
San Antonio AA	25	7,810	56.8	66,270	23.4	8.0	3.0	17.0	4.0	9.4	19.1	32.0	18.8	40.5	32.0	43.8	0.0	24.0	25.1
Austin AA	5	2,330	11.4	46,841	24.6	20.0	2.7	17.0	0.0	12.3	17.6	20.0	17.7	40.8	60.0	53.4	0.0	0.0	13.9
Ozona AA	0	0	0.0	38	23.4	0.0	0.0	10.3	0.0	5.3	22.8	0.0	7.9	43.4	0.0	76.3	0.0	0.0	10.5
<b>Total</b>	<b>44</b>	<b>11,163</b>	<b>100.0</b>	<b>116,637</b>	<b>23.7</b>	<b>11.4</b>	<b>2.9</b>	<b>17.1</b>	<b>18.2</b>	<b>10.6</b>	<b>18.6</b>	<b>27.3</b>	<b>18.3</b>	<b>40.6</b>	<b>25.0</b>	<b>47.5</b>	<b>0.0</b>	<b>18.2</b>	<b>20.5</b>

Source: 2006–2010 ACS Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-2018
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
San Angelo AA	51	10,034	44.3	2,690	21.5	15.7	4.3	18.2	17.6	12.3	20.7	9.8	20.5	39.5	43.1	38.8	0.0	13.7	24.2
San Antonio AA	50	14,599	43.5	62,326	23.4	12.0	3.3	17.5	18.0	11.4	19.1	10.0	20.7	40.0	42.0	42.6	0.0	18.0	22.0
Austin AA	14	7,027	12.2	41,674	24.8	0.0	3.6	15.90	0.0	14.2	18.1	7.1	18.5	41.2	64.3	51.7	0.0	28.6	12.0
Ozona AA	0	0	0.0	25	12.5	0.0	4.0	10.3	0.0	8.0	26.2	0.0	20.0	50.9	0.0	52.0	0.0	0.0	16.0
<b>Total</b>	<b>115</b>	<b>31,660</b>	<b>100.0</b>	<b>106,715</b>	<b>23.8</b>	<b>12.2</b>	<b>3.4</b>	<b>17.0</b>	<b>15.7</b>	<b>12.5</b>	<b>18.8</b>	<b>9.6</b>	<b>19.8</b>	<b>40.4</b>	<b>45.2</b>	<b>46.1</b>	<b>0.0</b>	<b>17.4</b>	<b>18.2</b>

Source: 2011–2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 and 2018 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0.