



## **PUBLIC DISCLOSURE**

May 11, 2020

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

First-Lockhart National Bank  
Charter Number 13934

111 South Main Street  
Lockhart, TX 78644

Office of the Comptroller of the Currency  
San Antonio North 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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

**Table of Contents**

Overall CRA Rating..... 2  
Description of Institution..... 4  
Scope of the Evaluation..... 5  
Discriminatory or Other Illegal Credit Practices Review..... 6  
Lending Test ..... 9  
Appendix A: Scope of Examination..... 11  
Appendix B: Summary of MMSA and State Ratings..... 12  
Appendix C: Definitions and Common Abbreviations..... 13  
Appendix D: Tables of Performance Data..... 17

## **Overall CRA Rating**

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

**The lending test is rated: Satisfactory.**

The major factors that support this rating include:

- The loan-to-deposit ratio is reasonable at 77.8 percent.
- The bank originated a majority of loans inside its assessment area (AA).
- The geographic distribution of loans reflects excellent dispersion to borrowers in low- and moderate-income (LMI) geographies.
- The distribution of loans reflects reasonable penetration to borrowers of different income levels and businesses of different sizes.
- There were no Fair Lending or CRA-related complaints during the evaluation period.

**Loan-to-Deposit Ratio**

Considering the bank’s size, financial condition, and credit needs of the AA, the bank’s loan-to-deposit ratio is reasonable.

The quarterly average loan-to-deposit (LTD) ratio was 77.8 percent during the evaluation period. The LTD ratio fluctuated during the evaluation period, from a low of 70.3 percent to a high of 80.2 percent. The LTD ratio was compared to six similarly situated institutions operating either within the AA or in counties adjacent to the AA. The quarterly average LTD ratio for these institutions during the evaluation period was 79.8 percent. The ratios ranged from an average low of 65.6 percent to an average high of 91.8 percent. The table below compares the bank’s average quarterly LTD ratio with the six peer institutions.

BANK NAME	CITY	STATE	TOTAL ASSETS (000s) (December 31, 2019)	Average LTD Ratio
First-Lockhart National Bank	Lockhart	TX	304,032	78
Frontier Bank of Texas	Elgin	TX	362,736	92
Schertz Bank & Trust	Schertz	TX	416,073	91
R Bank	Round Rock	TX	553,637	88
Sage Capital Bank	Gonzales	TX	419,948	76
The City National Bank of Taylor	Taylor	TX	197,116	67
The First National Bank of Bastrop	Bastrop	TX	622,055	66

**Lending in Assessment Area**

A majority of the bank’s loans are inside of its AA.

The bank originated and purchased 66.4 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	81	64.3	45	35.7	126	21,053	61.1	13,399	38.9	34,452
Small Business	16	80.0	4	20.0	20	2,533	37.7	4,182	62.3	6,715
Total	97	66.4	49	33.6	146	23,586	57.3	17,581	42.7	41,167

Source: HMDA and Loan Sample Data

## Description of Institution

First-Lockhart National Bank (FLNB), established in 1934, operates solely in the state of Texas. FLNB is wholly owned by Lockhart Bankshares, Inc. (LBI), a one-bank holding company also headquartered in Lockhart, Texas. LBI is a sub-chapter S company, independently owned by its shareholders. There are no other subsidiaries or related organizations. FLNB has had no merger or acquisition activity during the evaluation period.

The single assessment area consists of three contiguous counties in the Austin-Round Rock-Georgetown MSA: Caldwell County, Hays County, and Travis County. FLNB has four offices—the main office in Lockhart, a branch in Kyle, a branch in Austin, and a branch in San Marcos. The San Marcos branch is the newest office, located in Hays County, and opened in September 2019. FLNB also has a standalone motorbank in Lockhart and operates a network of five ATMs. The FDIC Institution Branch Report as of June 30, 2019 showed FLNB had total deposits of \$236 million. The Lockhart office had \$175 million, or 74.2 percent, of total bank deposits.

FLNB offers a variety of loan products. The primary loan products are commercial lending and residential real estate lending. The bank also originates residential mortgage loans for sale into the secondary market and offers various consumer loan products, including unsecured personal lines of credit. As of March 31, 2020, tier 1 capital totaled \$28 million and assets totaled \$295 million, with loans comprising 64.4 percent of total assets. The composition of the loan portfolio is summarized in the following table using Call Report information.

<b>Loan Portfolio Summary by Product as of March 31, 2020</b>		
<b>Loan Category</b>	<b>Dollar Volume \$(000)</b>	<b>% of Outstanding Dollars</b>
Commercial	\$ 117,627	62%
Residential Real Estate	\$ 65,973	35%
Agricultural	\$ 4,115	2%
Consumer	\$ 1,966	1%
Total	\$ 189,681	100%

Based on its financial condition and size, there is no financial or legal factors that inhibit FLNB's ability to meet credit needs of its AA. The prior CRA examination, dated June 26, 2017, assigned an overall Outstanding rating to FLNB's lending performance.

## **Scope of the Evaluation**

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

We evaluated FLNB lending activities using Small Bank Community Reinvestment Action (CRA) examination procedures. The initial examination scope covered the period from January 1, 2017 through December 31, 2019. The procedures include a lending test which evaluates the bank's record of meeting the credit needs in its assessment area.

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. We used the 2015 ACS demographics to analyze data related to years 2017-2019. In March 2020, we tested HMDA data for calendar years 2017, 2018, and 2019 to verify the accuracy of reported data and found it reliable for use in this evaluation.

The evaluation period under the lending test is representative of the bank's lending strategy since the last CRA examination. We focused on the bank's primary loan products: commercial lending and residential real estate lending.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are not addressed in this evaluation. Bank qualifying activities will be considered in the subsequent evaluation.

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

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

FLNB operates only in the State of Texas. FLNB's AAs include Caldwell County, Hays County, and Travis County. All three counties are part of the Austin-Round Rock MSA, we combined the counties for analytical purposes.

### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. FLNB's rating is based on performance in three counties in the Austin-Round Rock-Georgetown MSA. All branches are located within the MSA in the state of Texas. The overall rating is based on the bank's primary lending products. The MMSA rating and state ratings are based on performance in all bank AAs.

## **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**

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

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

- The loan-to-deposit ratio is reasonable at 77.8 percent.
- The bank originated a majority of loans inside its assessment area (AA).
- The geographic distribution of loans reflects excellent dispersion to borrowers in low- and moderate-income (LMI) geographies.
- The distribution of loans reflects reasonable penetration to borrowers of different income levels and businesses of different sizes.

## **Description of Institution's Operations in Texas**

As previously noted, FLNB operates only in Texas and specifically in three counties: Caldwell County, Hays County, and Travis County. The three counties are contiguous and are part of the Austin-Round Rock-Georgetown MSA. The AA contains 251 CTs, in which 60 are moderate-income tracts and 35 are low-income tracts. The AA meets regulatory requirements and does not arbitrarily exclude low and moderate-income geographies.

As previously noted, the bank has four offices in the MSA, along with five ATMs and one standalone motorbank. The Austin-Round Rock-Georgetown MSA is a highly competitive banking environment that includes several large national banks. The FDIC June 30, 2019 Deposit Market Share Report shows that 74 institutions operate 302 offices within the AA. FLNB has a deposit market share of 0.99 percent.

We reviewed previously gathered information from three economic development organizations in the region operating in the AA. The representatives of those programs indicated that local financial institutions are meeting the credit needs of the community, but identified needs for small business lending and affordable housing.

Using census data updated by the FFIEC for 2019, the Austin-Round Rock-Georgetown MSA had a weighted average median family income of \$95,900. Housing values in the AA are higher than the national average and vacant housing units are low at 8 percent. The largest industry is the services sector, representing 43 percent of all business in the AA. The overwhelming majority of business are small, with 88 percent of all business earning less than \$1 million in annual revenue and only 2 percent having more than 50 employees.



<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Austin-Round Rock-Georgetown MSA AA 2019</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)	251	13.9	23.9	30.7	29.1	2.4
Population by Geography	1,338,554	13.8	24.9	30.4	29.4	1.5
Housing Units by Geography	545,524	13.5	21.9	32.2	31.2	1.2
Owner-Occupied Units by Geography	268,814	5.4	21.2	32.8	40.4	0.3
Occupied Rental Units by Geography	233,217	22.5	22.9	31.3	21.1	2.2
Vacant Units by Geography	43,493	15.4	21.4	32.4	28.8	2.0
Businesses by Geography	156,305	8.3	13.5	29.0	47.6	1.6
Farms by Geography	2,957	6.6	18.3	31.1	43.6	0.4
Family Distribution by Income Level	292,716	24.7	16.6	18.5	40.2	0.0
Household Distribution by Income Level	502,031	25.7	16.9	17.5	39.9	0.0
Median Family Income MSA - 12420 Austin-Round Rock-Georgetown, TX MSA		\$78,997	Median Housing Value			\$250,762
			Median Gross Rent			\$1,070
			Families Below Poverty Level			11.1%
<i>Source: 2015 ACS and 2019 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>						

## Scope of Evaluation in Texas

We selected the bank's only assessment area for a full scope review. The AA, which includes three contiguous counties in the Austin-Round Rock – Georgetown MSA, is where the bank's offices are located. We evaluated FLNB lending activities using Small Bank Reinvestment Act CRA examination procedures. We used HMDA LAR to analyze home mortgages and did not sample any loans. For the commercial testing, we selected 20 random commercial loans. We analyzed 2017, 2018, and 2019 loans based on 2015 ACS data. For CRA purposes, the ACS replaces the decennial census.

## LENDING TEST

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

Based on a full-scope review, the bank's performance in the Austin-Round Rock-Georgetown MSA is reasonable. Our analysis focused on home mortgage loans and small loans to businesses as these loans, by number originated, are the primary lending product during the evaluation.

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

The bank exhibits excellent geographic distribution of loans in the AA.

#### *Home Mortgage Loans*

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

The geographic distribution of home mortgage loans to CTs of different income levels is excellent. First-Lockhart originated 9.9 percent of its home mortgage loans to borrowers located in low-income CTs and 37 percent to borrowers located in moderate-income CTs in 2017, 2018, and 2019. 2015 ACS census data indicates 5.4 percent and 21.2 percent of owner-occupied housing units are in low-income and moderate-income CTs, respectively. Aggregate HMDA data indicates 5.4 percent of home mortgage loans within the AA were originated to borrowers located in low-income CTs and 20.2 percent to borrowers located in moderate-income tracts during the evaluation period.

#### *Small Loans to Businesses*

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

The geographic distribution of business loans to CTs of different income levels is excellent. First-Lockhart originated 5 percent of sampled business loans to businesses located in low-income tracts and 60 percent to businesses in moderate-income tracts. 2019 D&B data indicates 8.3 percent of AA businesses are in low-income CTs and 13.5 percent of businesses are in moderate-income CTs.

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

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

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

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

The bank exhibits reasonable distribution of home mortgage loans to borrowers of different income levels, given the economic conditions and competitive lending environment in the AA. FLNB originated 8.6 percent of home mortgage loans to low-income borrowers and 16.6 percent to moderate-income borrowers. It should be noted that almost 30 percent of the bank's HMDA reportable loans during the evaluation period did not have borrower income information available. Based on the AA, low-income borrowers accounted for 24.7 percent of the AA demographics while moderate-income borrowers accounted for 16.6 percent. FLNB compares favorably to other HMDA filing institutions in dispersion of loans to low-income borrowers. Aggregate HMDA data indicates that only 3.7 percent of home mortgage loans in the AA were originated to low-income borrowers.

### ***Small Loans to Businesses***

Refer to Table R in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses of different sizes within the AA is reasonable. Based on our commercial sample, FLNB originated 75 percent of commercial loans to businesses with gross annual revenue of less than \$1 million. 2019 demographic data indicates that 87.7 percent of businesses in AA qualify as "small businesses," but aggregate data for other lenders suggests that only 42.5 percent of commercial loans originated to small businesses.

## **Responses to Complaints**

First-Lockhart has not received any complaints about its CRA performance between June 26 2017 (date of previous CRA examination) and May 11, 2020 (date of current examination).

## 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 MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope.”

<b>Time Period Reviewed:</b>	01/01/2017 to 12/31/2019	
<b>Bank Products Reviewed:</b>	Home mortgage and small business	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Not applicable	Not applicable	Not applicable
<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>
<b>MMSA(s)</b>		
Austin-Round Rock-Georgetown MSA	Full-scope	Counties of Caldwell, Hays, and Travis

## Appendix B: Summary of MMSA and State Ratings

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RATINGS FIRST-LOCKHART NATIONAL BANK	
Overall Bank:	Lending Test Rating
First-Lockhart National Bank	Satisfactory
MMSA or State:	
Texas	Satisfactory

## 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.

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																			<b>2017-19</b>	
Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
#	\$	% of Total by #	Overall Market by #	% 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		
<b>Total</b>	<b>81</b>	<b>21,053</b>	<b>100.0</b>	<b>50,912</b>	<b>5.4</b>	<b>9.9</b>	<b>5.4</b>	<b>21.2</b>	<b>37.0</b>	<b>20.2</b>	<b>32.8</b>	<b>37.0</b>	<b>36.0</b>	<b>40.4</b>	<b>16.0</b>	<b>38.0</b>	<b>0.3</b>	<b>0.0</b>	<b>0.4</b>	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017-19</b>	
Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
#	\$	% of Total by #	Overall Market by #	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
<b>Total</b>	<b>81</b>	<b>21,053</b>	<b>100.0</b>	<b>50,912</b>	<b>24.7</b>	<b>8.6</b>	<b>3.7</b>	<b>16.6</b>	<b>7.4</b>	<b>14.9</b>	<b>18.5</b>	<b>8.6</b>	<b>20.2</b>	<b>40.2</b>	<b>45.7</b>	<b>47.5</b>	<b>0.0</b>	<b>29.6</b>	<b>13.7</b>	

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2017-19</b>	
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	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total by #	Overall Market by #	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
<b>Total</b>	<b>20</b>	<b>2,873</b>	<b>2.4</b>	<b>41,679</b>	<b>8.3</b>	<b>5.0</b>	<b>8.8</b>	<b>13.5</b>	<b>60.0</b>	<b>14.7</b>	<b>29.0</b>	<b>25.0</b>	<b>29.2</b>	<b>47.6</b>	<b>10.0</b>	<b>46.2</b>	<b>1.6</b>	<b>0.0</b>	<b>1.0</b>
<i>Source: 2019 D&amp;B Data; business loan sample                      Due to rounding, totals may not equal 100.0%</i>																			

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2017-19</b>	
<b>Total</b>	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total by #	Overall Market by #	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
	<b>20</b>	<b>2,873</b>	<b>2.4</b>	<b>41,679</b>	<b>87.7</b>	<b>75.0</b>	<b>42.5</b>	<b>4.0</b>	<b>20.0</b>	<b>8.3</b>	<b>5.0</b>		
<i>Source: 2019 D&amp;B Data; business loan sample                      Due to rounding, totals may not equal 100.0%</i>													