



## **PUBLIC DISCLOSURE**

April 19, 2021

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

The City National Bank of Taylor  
Charter Number 5275

212 North Main Street  
Taylor, TX 76574-3515

Office of the Comptroller of the Currency  
Southern District  
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, 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 major factors that support this rating include:

- The quarterly average loan-to-deposit (LTD) ratio is reasonable.
- A majority of loans originated inside the assessment area (AA).
- The bank exhibits a reasonable distribution of loans to borrowers of different income levels, given the product lines offered by the bank and credit needs of the AA.
- The geographic distribution of originations reflects excellent dispersion throughout the AA.

### 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.

City National Bank of Taylor's (CNBT) quarterly LTD ratio averaged 66 percent over the 14-quarter evaluation period ending December 31, 2019. During this timeframe, CNBT's LTD ratio ranged from a low of 61 percent to a high of 71 percent. CNBT's average quarterly LTD ratio exceeded the average quarterly ratio of four similarly sized institutions. The overall average quarterly LTD ratio of the other four institutions was 50 percent and ranged from 28 percent to 73 percent.

### Lending in Assessment Area

A majority of the bank's loans are inside its AA. By number of loans, CNBT originated 60 percent of the home mortgage loan sample inside the bank's AA 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                                     | 167             | 60 | 113     | 40 | 280     | 18,172                          | 41 | 26,567  | 59 | 44,739         |

### Description of Institution

CNBT, an intrastate bank headquartered in Taylor, Texas, is a wholly owned subsidiary of CNB Financial Corporation, a one-bank holding company based in Taylor. We did not review any activities of the bank holding company in this Performance Evaluation (PE). Holding company activities do not adversely affect CNBT's capacity to lend or invest in its AA.

In addition to the main office, the bank has a lending center and drive-through banking branch located in Taylor. The bank has eight automated teller machines (ATMs) located in Taylor and the immediate

surrounding communities of Thorndale, Granger, and Hutto. Seven of the eight ATMs have deposit-taking capabilities.

At December 31, 2019 CNBT reported total assets of \$197 million. Loans totaled \$116 million or 59 percent of total assets with an LTD ratio of 66 percent. Residential real estate loans comprise the majority of the loan portfolio, followed by commercial loans.

CNBT offers full banking services, including standard deposit and loan products, Monday through Friday. Personal deposit account options include free Kasasa checking and savings, money market, and Reward Savings. The bank also offers standard savings and time accounts including an individual retirement account (IRA). Other products and services include VISA debit and gift cards, savings bonds, cashier checks, safe deposit boxes, onsite notary, no liability merchant processing programs, remote deposit capture, mobile deposit, CNBT mobile app and online banking. The CNBT mobile app and online banking give customers instant access to their accounts and real time balances, internal and external funds transfers, and bill pay. Customers may also apply for loans online using the bank's web site, [www.cnbt.com](http://www.cnbt.com).

CNBT faces strong competition in its AA from local community banks, credit unions, non-bank financial institutions, mortgage companies, online lenders, and regional banks. In an effort to increase its loan portfolio, CNBT expanded its origination of 1-4 family residential real estate loans into Port Aransas, Texas during the prior evaluation period. Although this supplemental lending activity is outside the bank's AA, CNBT's primary strategy and focus is meeting the credit needs of its local, Central Texas, community.

The prior examination, dated June 30, 2016, assigned an overall "Satisfactory" rating to CNBT's CRA performance. Based on its financial condition, size, product offerings, and branch network, there are no legal, financial, or other factors that inhibit CNBT's ability to help meet credit needs in its AA.

## **Scope of the Evaluation**

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

The evaluation period for the lending test covered lending activities from January 1, 2017 through December 31, 2019. The bank's primary loan product, residential real estate, was selected for testing.

To assess performance, we analyzed CNBT's average quarterly LTD ratio for the 14 quarters in the evaluation period and lending activities for the calendar years 2017 through 2019. The bank's AA includes 16 census tracts (CT) located in the Austin-Round Rock-Georgetown metropolitan statistical area (MSA). The bank is a Home Mortgage Disclosure Act (HMDA) reporter. We conducted a data integrity review of the bank's HMDA data and found it to be reliable to use for assessing the bank's residential lending performance.

### **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 MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are

combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

CNBT had one AA during the evaluation period; we performed a full-scope review of it.

### **Ratings**

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings. The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

CNBT did not have any multi-state AAs or a multi-state rating during the evaluation period; it operates only in Texas.

### **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 (or any affiliate whose loans have been considered as part of the institution’s lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of Texas

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

**The Lending Test is rated:** Satisfactory

The major factors that support this rating include:

- The quarterly average LTD ratio is reasonable.
- A majority of loans originated inside AA.
- The bank exhibits a reasonable distribution of loans to borrowers of different income levels, given the product lines offered by the bank.
- The geographic distribution of originations reflects excellent dispersion throughout the AA

### Description of Institution's Operations in Texas

#### Williamson AA

The Williamson AA includes 16 CTs located in Williamson County. One of the 16 CTs is low-income, four are moderate-income, 10 are middle-income, and one is upper-income. Cities located within the AA include Taylor, Granger, Hutto, Jarrell, and Thrall. The bank's defined AA meets the requirement of the regulation and does not arbitrarily exclude any low- or moderate-income geographies. The table below provides additional demographic information about the AA.

The City of Taylor, centrally located within the AA, has a combined population of 70 thousand. Majority of the population is located in middle-income CTs while majority of households are in upper-income level. Primary industries include services, retail trade and construction. Major employers include Electric Reliability Council of Texas (ERCOT), Taylor ISD, Wal-Mart, and the City of Taylor. Of the 4,936 businesses with operations within the AA, 94 percent are single location businesses with sole operations located within the AA. The vast majority (90 percent) of AA businesses have revenues less than \$1 million.

In conducting the evaluation of CNBT's CRA performance, we contacted a member of the local community to discuss community needs. A contact from the Greater Austin Chamber of Commerce stated the area has experienced good economic growth that placed Austin among the fastest growing metropolitan areas in the country. A contact from the Round Rock Chamber of Commerce also stated that the area has seen continued population growth that is driving demand for commercial, industrial, and residential real estate development.

**Table A - Demographic Information of the Assessment Area**

Assessment Area: Williamson AA

| Demographic Characteristics   | #      | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
|---|--------|---------------|------------------------------|------------------|-----------------|---------------|
| Geographies (Census Tracts)   | 16     | 6.3           | 25.0                         | 62.5             | 6.3             | 0.0           |
| Population by Geography   | 69,990 | 4.3           | 18.6                         | 62.8             | 14.3            | 0.0           |
| Housing Units by Geography  | 24,516 | 4.2           | 18.7                         | 63.6             | 13.4            | 0.0           |
| Owner-Occupied Units by Geography                                     | 17,254 | 3.0           | 15.0                         | 68.0             | 14.0            | 0.0           |
| Occupied Rental Units by Geography                                    | 5,381  | 7.1           | 28.1                         | 49.8             | 15.1            | 0.0           |
| Vacant Units by Geography   | 1,881  | 7.1           | 26.1                         | 63.0             | 3.8             | 0.0           |
| Businesses by Geography   | 4,936  | 2.6           | 19.0                         | 59.3             | 19.1            | 0.0           |
| Farms by Geography  | 290    | 1.7           | 20.7                         | 70.0             | 7.6             | 0.0           |
| Family Distribution by Income Level                                   | 17,259 | 20.6          | 19.5                         | 25.4             | 34.5            | 0.0           |
| Household Distribution by Income Level                                | 22,635 | 21.5          | 16.2                         | 19.6             | 42.7            | 0.0           |
| Median Family Income MSA - 12420 Austin-Round Rock-Georgetown, TX MSA |        | \$78,997      | Median Housing Value         |                  |                 | \$154,734     |
|   |        |               | Median Gross Rent            |                  |                 | \$988         |
|   |        |               | Families Below Poverty Level |                  |                 | 7.2%          |

Source: 2015 ACS Census and 2019 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 performed a full-scope review of the bank's only AA and based the overall rating on our findings.

## LENDING TEST

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

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Williamson AA is adequate.

## Distribution of Loans by Income Level of the Geography

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

### *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.

The geographic distribution of originations reflects excellent dispersion throughout the AA. The bank originated 4.9 percent of loans to low-income tracts and 32.3 percent of loans to moderate-income tracts. This compares favorably to the average for similar institutions in the AA who, in aggregate, originated 1.3 percent of loans to low-income tracts and 6.9 percent to moderate-income tracts.

## **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 the state of Texas of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

During the evaluation period, 6.7 percent of originations were to low-income borrowers while 18.3 percent were to moderate-income borrowers. This is consistent with lending activity from other similar institutions in the AA who, in aggregate, originated 7.5 percent of loans to low-income borrowers and 26.7 percent to moderate-income borrowers.

### **Responses to Complaints**

CNBT did not receive any complaints related to its CRA or fair lending performance during the evaluation period.

## 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>                            | (1/1/2017-12/31/2019)         |  |
| <b>Bank Products Reviewed:</b>                          | Home Mortgage                 |  |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b> | <b>Products Reviewed</b>               |
| None  | N/A                           | N/A                                    |
| <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>State: Texas</b>                                     |                               |  |
| Williamson AA   | Full-Scope                    | Partial portions of Williamson County. |

# Appendix B: Summary of MMSA and State Ratings

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| RATINGS: City National Bank of Taylor |                     |
|---------------------------------------|---------------------|
| Overall Bank:                         | Lending Test Rating |
| City National Bank of Taylor          | Satisfactory        |
| State of 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.
- 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.

| <b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b> |                           |               |              |                |                                   |              |            |                                   |              |            |                                   |              |             |                                   |              |             |                                   |              |            | <b>2017-19</b> |  |
|---|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|----------------|--|
| 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  |                |  |
| Williamson AA   | 164                       | 17,766        | 100.0        | 5,970          | 3.0                               | 4.9          | 1.3        | 15.0                              | 32.3         | 6.9        | 68.0                              | 62.8         | 78.8        | 14.0                              | 0.0          | 13.0        | 0.0                               | 0.0          | 0.0        |                |  |
| <b>Total</b>  | <b>164</b>                | <b>17,766</b> | <b>100.0</b> | <b>5,970</b>   | <b>3.0</b>                        | <b>4.9</b>   | <b>1.3</b> | <b>15.0</b>                       | <b>32.3</b>  | <b>6.9</b> | <b>68.0</b>                       | <b>62.8</b>  | <b>78.8</b> | <b>14.0</b>                       | <b>0.0</b>   | <b>13.0</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |                |  |

*Source: 2015 ACS Census; 01/01/2017 - 12/21/2019 Bank Data, 2019 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> |  |
|--|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|----------------|--|
| 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   |                |  |
| Williamson AA  | 164                       | 17,766        | 100.0        | 5,970          | 20.6                 | 6.7          | 7.5        | 19.5                      | 18.3         | 26.7        | 25.4                    | 22.0         | 25.2        | 34.5                   | 32.9         | 20.5        | 0.0                            | 20.1         | 20.2        |                |  |
| <b>Total</b>   | <b>164</b>                | <b>17,766</b> | <b>100.0</b> | <b>5,970</b>   | <b>20.6</b>          | <b>6.7</b>   | <b>7.5</b> | <b>19.5</b>               | <b>18.3</b>  | <b>26.7</b> | <b>25.4</b>             | <b>22.0</b>  | <b>25.2</b> | <b>34.5</b>            | <b>32.9</b>  | <b>20.5</b> | <b>0.0</b>                     | <b>20.1</b>  | <b>20.2</b> |                |  |

*Source: 2015 ACS Census ; 01/01/2017 - 12/21/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*