



## **PUBLIC DISCLOSURE**

November 1, 2021

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

First National Bank of Giddings  
Charter Number: 4410

108 E. Austin  
Giddings, TX 78942

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

**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 Lending Test rating was based on the bank's performance within the one full-scope review designated assessment area (AA).

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable.
- A majority of the bank's loans are inside its AA.
- The bank exhibits reasonable distribution of loans by income level of the borrower for home mortgage and small loans to businesses.
- The bank exhibits excellent distribution of small loans to farms by income level of the borrower.

### Loan-to-Deposit Ratio

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

First National Bank of Giddings (FNB Giddings) quarterly average LTD ratio calculated on a bank-wide basis for the 15-quarter evaluation period was 63.88 percent. The LTD ratio ranged from a low of 58.04 percent at December 31, 2020 to a high of 70.34 percent at September 30, 2019. The LTD ratio reflects an improvement from the average of 52 percent during the prior performance period. The average LTD ratio among three similarly situated institutions, with total assets between \$528 million and \$777 million, ranged from 62.63 percent to 83.25 percent.

### Lending in Assessment Area

A majority of the bank's loans are inside its AA. The bank originated and purchased 63.3 percent of its total loans by number 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	12	60.0	8	40.0	20	1,968	30.1	4,572	69.9	6,540
Small Business	12	60.0	8	40.0	20	1,434	54.7	1,190	45.3	2,624
Small Farm	14	70.0	6	30.0	20	2,320	54.3	1,951	45.7	4,271
<b>Total</b>	<b>38</b>	<b>63.3</b>	<b>22</b>	<b>36.7</b>	<b>60</b>	<b>5,722</b>	<b>42.6</b>	<b>7,713</b>	<b>57.4</b>	<b>13,435</b>

Source: Bank Data. Due to rounding, totals may not equal 100%

## Description of Institution

FNB Giddings, a full-service, intrastate community bank headquartered in Giddings, Texas, is located 50 miles east of Austin and 100 miles west of Houston. FNB Giddings is 100 percent owned by Giddings Holdings, Inc., a one-bank holding company that is 100 percent owned by Giddings Bancshares, Inc., headquartered in Giddings, Texas. There were no affiliate or subsidiary activities considered in this evaluation.

FNB Giddings operates two locations in Giddings, Texas, the main office and a stand-alone drive-through facility. Each location has an onsite automatic teller machine (ATM) and convenient banking hours Monday through Friday. The drive-through facility is also open on Saturdays. FNB Giddings has not opened or closed any branch or ATM locations since the prior CRA evaluation.

FNB Giddings offers traditional loan and deposit products. Online banking, accessible through the bank's website (<https://www.fnbiddings.com>), allows customers to pay bills, check account balances, transfer funds between customer accounts, peer-to-peer payments and transfers, make loan payments, view account transactions, and use remote check deposit. In addition, depositors can access account funds 24-hours a day via the bank's ATMs. While loans are offered only at the main office, loan applications are available online. FNB Giddings business strategy remains focused on offering single family residential loans and commercial loans as primary lending products.

The FDIC's Deposit Market Share report as of September 30, 2021, reflects seven financial institutions that operate 10 offices within the bank's AA. FNB Giddings ranks second in terms of total deposit share with total deposits of \$178.1 million or a deposit market share of 23.9 percent. Round Top State Bank ranks first with a 36.6 percent deposit market share. At December 31, 2020, FNB Giddings reported \$260.6 million in total assets, including nearly \$136 million in total loans.

<b>Loan Type</b>	<b>Dollar Amount of Loans \$(000s)</b>	<b>% of Total Loan Portfolio</b>
Residential Loans	50,872	37.43%
Commercial Loans	40,666	29.92%
Farmland Loans	36,357	26.75%
Agricultural Production	3,451	2.54%
Consumer Loans	4,158	3.06%
Other	391	0.29%
<b>Total</b>	<b>135,895</b>	<b>100.00%</b>

In response to the Coronavirus Aid, Relief, and Economic Security Act or CARES Act established in 2020, FNB Giddings participated in the Small Business Administrations' Paycheck Protection Program (PPP). These loans were designed to provide a direct incentive for small businesses to keep their workers on payroll during the COVID pandemic. The bank originated 77 PPP loans totaling \$5.7 million in 2020.

Based on the financial condition, size, and product offerings, there are no legal, financial, or other factors that inhibit FNB Giddings' ability to meet the credit needs of its AA. The prior CRA performance evaluation, dated July 24, 2017, assigned an overall Satisfactory rating.

## **Scope of the Evaluation**

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

The evaluation period for this examination was January 1, 2018 to December 31, 2020. Qualifying lending activities performed in response to the Coronavirus pandemic during the evaluation period are included in this CRA evaluation.

To evaluate lending performance, analysis was completed on a random sample of home mortgage, small business, and small farm loans. For the geographic and borrower distribution analyses, we compared lending performance data to updated 2015 American Community Survey census data effective January 2017.

### **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. 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.

For analytical purposes, FNB Giddings has one AA. Lee County AA encompasses the entirety of Lee County as well as two CTs within Fayette County and one CT within Washington County. The CTs are contiguous and there are no low or moderate-income (LMI) CTs. The AA does not arbitrarily exclude LMI CTs.

### **Ratings**

The bank’s overall rating is based on performance in the State of Texas. Except for the bank’s LTD ratio (based on the bank’s entire lending portfolio), all weight for performance under the Lending Test was equally based on the bank’s lending performance in relation to the three primary products in its one AA.

## **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 major factors that support this rating include:

- The bank's LTD ratio is reasonable.
- A majority of the bank's loans are inside its AA.
- The bank exhibits reasonable distribution of loans by income level of the borrower for home mortgage and small loans to businesses.
- The bank exhibits excellent distribution of small loans to farms by income level of the borrower.

### Description of Institution's Operations in Texas

FNB Giddings operates two locations in Giddings, TX, including the main office and a separate drive-thru facility. Both locations offer ATM access. The bank locations reside in the Lee County AA, which consists of seven CTs. The AA encompasses the entirety of Lee County as well as two CTs within Fayette County and one CT within Washington County. The CTs are contiguous and there are no low or moderate-income (LMI) CTs. The AA does not arbitrarily exclude LMI CTs.

### Lee County AA

The AA consists of a total population of 27,932 individuals with the majority residing in an upper-income CT based on 2015 ACS data. This includes 7,414 family units and 14,528 housing units. Approximately 56 percent of all housing units are owner-occupied. When considering family distribution by income level, the majority of families in the AA are considered middle or upper income with the AA median family income being \$52,198 based on FFIEC data. The primary economic and employment opportunities are centered in the retail, services, and agricultural industry. The overwhelming majority of businesses are single-location small businesses with revenue less than \$500,000, employing an average of less than nine employees each.

The unemployment level at the beginning of 2018 for the AA was 3.6 percent, decreasing to 3.0 percent as of year-end 2019. The unemployment rate increased to 4.7 percent by year-end 2020 as a direct result of adverse impacts caused by COVID-19. In comparison, the Texas unemployment rate ranged from 4.1 percent in the beginning of 2018 to 3.5 percent by year-end 2019. The state unemployment rate stood at 6.9 percent at year-end 2020. The AA has been able to benefit from its proximity to both Austin and Houston, Texas and has capitalized on the flow of traffic and goods through the AA.

Demographic Information of the Assessment Area						
Assessment Area: Lee County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	7	0.0	0.0	42.9	57.1	0.0
Population by Geography	27,932	0.0	0.0	38.9	61.1	0.0
Housing Units by Geography	14,528	0.0	0.0	37.2	62.8	0.0
Owner-Occupied Units by Geography	8,127	0.0	0.0	34.2	65.8	0.0
Occupied Rental Units by Geography	2,396	0.0	0.0	43.6	56.4	0.0
Vacant Units by Geography	4,005	0.0	0.0	39.4	60.6	0.0
Businesses by Geography	2,232	0.0	0.0	44.5	55.5	0.0
Farms by Geography	208	0.0	0.0	34.6	65.4	0.0
Family Distribution by Income Level	7,414	12.8	14.4	20.4	52.4	0.0
Household Distribution by Income Level	10,523	19.0	13.3	14.3	53.3	0.0
Median Family Income Non-MSAs - TX		\$52,198	Median Housing Value			\$128,372
			Median Gross Rent			\$771
			Families Below Poverty Level			7.9%
<i>Source: 2015 ACS and 2020 D&amp;B Data 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>						

The FDIC Deposit Market Share Report as of June 30, 2019 reflects FNB Giddings ranks second in terms of total deposit market share within the AA, accounting for 23.91 percent, or \$178.1 million. This deposit market share within the AA includes all of Lee County and portions of Fayette and Washington County. The bank is only surpassed by Round Top State Bank with 36.6 percent total deposit market share. When solely considering Lee County, the deposit market share increases to 38.8 percent as of June 30, 2021.

To help identify needs and opportunities in the AA we reviewed two prior regulatory agency contacts as well as conducted one contact outreach as part of this performance evaluation. The three contacts were directly or indirectly involved in area business opportunities and were knowledgeable on the local community. We found that primary needs included consumer and residential lending, small business lending, small business financial education outreach, and additional infrastructure spending. The contacts also praised local financial institutions for their support in providing PPP opportunities for area businesses.

## Scope of Evaluation in Texas

We performed a full-scope review of the Lee County AA. This is a non-MSA AA. We did not perform an assessment of the distribution of loans by income level of the geography because there were no LMI CTs within the AA. This would have resulted in an analysis that would not have been meaningful.

## 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 Lee County AA is good.

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

There are no low or moderate income CTs in Lee County AA. An analysis of the bank's geographic distribution of loans would not be meaningful.

### **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 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.

The distribution of home mortgage loans to borrowers of different income levels is reasonable. The bank did not originate home mortgage loans to low-income families during the evaluation period. The aggregate lender data, which reports on loan distributions by competitor institutions, was negligible at 1.7 percent. The increase in home purchase prices, coupled with the increasing amounts needed for down payments and closing costs have negatively impacted the bank's performance among low-income borrowers. The percentage of bank loans to moderate-income families is less than the percentage of moderate-income families in the AA but is greater than aggregate lender distributions, reflecting more favorable performance as compared to other institutions in the AA.

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

Refer to Table R in the state of Texas section of 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 is reasonable. The percentage of bank loans to businesses with gross annual revenues of less than \$1 million is only slightly below the total percent of small businesses within the AA. The bank's percent of loans, however, is more than twice the aggregate lending data from other business lenders in the AA.

#### ***Small Loans to Farms***

Refer to Table T in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The distribution of small loans to farms is excellent. All loans within the sample size were to farms with annual revenues of \$1 million or less. This exceeds the percentage within the AA as well as the aggregate data on lending made by other financial institutions within the AA.

## **Responses to Complaints**

The bank did not receive any complaints related to CRA or fair lending performance during the evaluation.

## 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>	January 1, 2018 – December 31, 2020	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, and small farm loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	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>State of Texas</b>		
Lee County AA	Full-scope	Includes portions of Fayette and Washington Counties

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS</b>	<b>First National Bank of Giddings</b>
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
First National Bank of Giddings	Satisfactory
<b>State:</b>	
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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2018-20</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	
Lee County AA 2020	20	2,108	100.0	814	12.8	0.0	1.7	14.4	10.0	6.1	20.4	--	15.0	52.4	90.0	61.3	0.0	0.0	15.8	
<b>Total</b>	<b>20</b>	<b>2,108</b>	<b>100.0</b>	<b>814</b>	<b>12.8</b>	<b>0.0</b>	<b>1.7</b>	<b>14.4</b>	<b>10.0</b>	<b>6.1</b>	<b>20.4</b>	<b>--</b>	<b>15.0</b>	<b>52.4</b>	<b>90.0</b>	<b>61.3</b>	<b>0.0</b>	<b>0.0</b>	<b>15.8</b>	

*Source: 2015 ACS Census ; 01/01/2018 - 12/21/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2018-20</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Lee County AA 2020	20	1,504	100.0	514	87.2	80.0	36.2	3.5	20.0	9.3	0.0		
<b>Total</b>	<b>20</b>	<b>1,504</b>	<b>100.0</b>	<b>514</b>	<b>87.2</b>	<b>80.0</b>	<b>36.2</b>	<b>3.5</b>	<b>20.0</b>	<b>9.3</b>	<b>0.0</b>		

*Source: 2020 D&B Data; 01/01/2018 - 12/21/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2018-20</b>
<b>Assessment Area:</b>	<b>Total Loans to Farms</b>				<b>Farms with Revenues &lt;= 1MM</b>			<b>Farms with Revenues &gt; 1MM</b>		<b>Farms with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>% Farms</b>	<b>% Bank Loans</b>
Lee County AA 2020	20	1,914	100.0	55	99.0	100.0	58.2	0.5	0.0	0.5	0.0
<b>Total</b>	<b>20</b>	<b>1,914</b>	<b>100.0</b>	<b>55</b>	<b>99.0</b>	<b>100.0</b>	<b>58.2</b>	<b>0.5</b>	<b>0.0</b>	<b>0.5</b>	<b>0.0</b>

*Source: 2020 D&B Data; 01/01/2018 — 12/21/2020 Bank Data; 2019 CRA Aggregate Data, “—” data not available.  
Due to rounding, totals may not equal 100.0%*