



**PUBLIC DISCLOSURE**

August 10, 2020

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

First National Bank of Huntsville  
Charter Number 4208  
1300 11th Street  
Huntsville, TX 77340

Office of the Comptroller of the Currency  
1301 McKinney Street, Suite 1410  
Houston, TX 77010-3031

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

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## Overall CRA Rating

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

**The Lending Test is rated: Satisfactory**

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

The major factors that support this rating include:

- The loan-to-deposits (LTD) ratio is more than reasonable
- A substantial majority of loans were originated in the assessment areas (AA)
- The bank exhibited reasonable geographic distribution of loans to low- or moderate-income (LMI) census tracts (CTs)
- The bank exhibited reasonable distribution of loans to individuals of different income levels and businesses of different sizes
- The Community Development (CD) Test rating is based on a satisfactory level of CD loans, qualified investments, donations, and CD services.
- The bank did not receive any CRA-related complaints during the evaluation period

### Loan-to-Deposit Ratio

First National Bank of Huntsville's (FNB Huntsville) LTD ratio is more than reasonable given the bank's size and the credit needs of its AAs. As of December 31, 2019, FNB Huntsville's quarterly average LTD was 61.0 percent, ranging from a low of 58.2 percent to a high of 63.2 percent since the last CRA examination. In order to evaluate FNB Huntsville's performance, we identified five similarly situated community banks comparable in asset size and product offerings. The comparator average LTDs ranged from an average low of 37.2 percent to an average high of 73.7 percent, with an average LTD of 59.8 percent. FNB Huntsville's LTD ratio is more than reasonable when compared to the average LTD of comparator banks.

### Lending in Assessment Area

A substantial majority of the bank's loans are inside its AAs.

The bank originated 91 percent of its total loans inside its 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.

| <b>Lending Inside and Outside of the Assessment Area</b> |                 |              |         |       |       |                          |              |         |       |        |
|--|-----------------|--------------|---------|-------|-------|--------------------------|--------------|---------|-------|--------|
| Type of Loan   | Number of Loans |              |         |       |       | Dollars of Loans (000's) |              |         |       |        |
|  | Inside          |              | Outside |       | Total | Inside                   |              | Outside |       | Total  |
|  | #               | %            | #       | %     |       | \$                       | %            | \$      | %     |        |
| Residential  | 523             | 90.17        | 57      | 9.83  | 580   | 76,875                   | 90.19        | 8,366   | 9.81  | 85,241 |
| Consumer   | 72              | 90.00        | 8       | 10.00 | 80    | 681                      | 85.78        | 113     | 14.22 | 794    |
| Commercial   | 75              | 93.75        | 5       | 6.25  | 80    | 4,333                    | 96.43        | 160     | 3.57  | 4,493  |
| Totals   | 670             | <b>90.54</b> | 70      | 9.46  | 740   | 81,889                   | <b>90.46</b> | 8,639   | 9.54  | 90,528 |

## Description of Institution

FNB Huntsville is a full-service community bank headquartered at 1300 11th Street in Huntsville, Texas. The bank was chartered on January 14, 1890, originally as Gibbs National Bank. In 1923, the bank changed its name to First National Bank of Huntsville. FNB Huntsville is the only locally owned community bank. It is wholly owned by First National Bancshares of Huntsville, Inc.

The bank's two AAs, the Huntsville Non-Metropolitan Statistical Area (MSA) AA and College Station-Bryan MSA AA, have a total of six full-service locations. In addition to the main branch, the bank has an additional branch in Huntsville, and one each in Bryan, Crockett, Franklin, and Madisonville. Of the six locations, two are in upper-income CTs, two in middle-income CTs, and two in moderate-income CTs. Each location has reasonable banking hours, a nondeposit taking automated teller machine (ATM), and drive through facility. There is also a stand-alone ATM located in the Sam Houston State University computer lab and one at Huntsville Memorial Hospital. Two drive through locations in Huntsville are open on Saturdays to help meet the banking needs in the community. The bank offers online and mobile banking services to both personal and business customers. The bank's website details information on products and services offered for consumers and businesses. As an added service FNB Huntsville promotes financial literacy through its Financial Fitness Center on its website.

As of December 31, 2019, FNB Huntsville had \$486 million in total assets with a tier 1 leverage capital ratio of 11.92 percent. The loan portfolio totals \$255 million or 55 percent of earning assets. The bank offers a wide array of credit products to its customers including commercial, residential real estate, consumer, commercial real estate, and agricultural loans. The bank offers an online mortgage application portal for customer convenience. In addition to its loan products, the bank also offers a variety of standard deposit products and services to appeal to different types of customers and their needs.

There are no legal or financial circumstances impeding the bank's ability to meet the credit and CD needs within its AAs. The bank was rated "Satisfactory" at its last CRA evaluation dated May 8, 2017.

*Please refer to the bank's Public File for additional information.*

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

FNB Huntsville was evaluated under the Intermediate Small Bank CRA Evaluation Procedures, which include the Lending Test and Community Development Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through lending activities. Our evaluation period for the Lending Test was from January 1, 2017 through December 31, 2019. The Community Development Test evaluates the bank's responsiveness to the CD needs and opportunities within the community. We evaluated CD activities from May 9, 2017 through December 31, 2019.

In evaluating the bank's lending performance, we reviewed the bank's primary products which were identified as residential real estate, consumer, and commercial loans. By dollar volume, both residential real estate and commercial loans represented 41 percent and 33 percent of the loan portfolio, respectively. By number, consumer loans represented 38 percent of the loan portfolio.

### Data Integrity

We performed a data integrity review in April 2020 prior to the CRA evaluation to assess the reliability of loan data subject to the Home Mortgage Disclosure Act (HMDA) reporting requirements. We verified data reliability by assessing internal policies and procedures. We performed transaction testing of loan data reported on your HMDA Loan Application Records for 2017, 2018, and 2019. Our total random sample consisted of 120 loans, as detailed in OCC Bulletin 2017-31, "FFIEC HMDA Examiner Transaction Testing Guidelines." We found internal policies and procedures satisfactory and deemed your HMDA data reliable. The bank is not required to collect and report business and consumer loan data; however, management has elected to collect this data. We selected a sample of these products using reports of loan originations during the Lending Test evaluation period.

### 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 AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area 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 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.

### Ratings

The bank's overall rating is limited to the state of Texas, as FNB Huntsville only has branches in this state. While no loan product was given more weight over the other, we did place more weight on the Huntsville Non-MSA AA in comparison to the College Station-Bryan MSA AA due to the significant volume of loans and deposits that come from this AA as well as branch distribution with four of the six branches located in the Huntsville Non-MSA AA.

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.

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

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

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## State Rating

### State of Texas

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

**The Lending Test is rated:** Satisfactory

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

The major factors that support this rating include:

- The LTD ratio is reasonable
- A substantial majority of loans were originated in the AAs
- The bank exhibited reasonable geographic distribution of loans to LMI tracts
- The bank exhibited reasonable distribution of loans to individuals of different income levels and businesses of different sizes
- The CD Test rating is based on a satisfactory level of CD loans, qualified investments, donations, and CD services.
- The bank did not receive any CRA-related complaints during the evaluation period

### Description of Institution's Operations

FNB Huntsville has one main office, five branches, and a total of eight ATMs within its two AAs. The Huntsville Non-MSA AA is comprised of five contiguous counties surrounding Huntsville, Texas. The AA has 29 CTs within the Leon, Houston, Madison, Trinity, and Walker Counties. Of the 29 CTs, one is low-income, six are moderate-income, 17 are middle-income, and five are upper-income. Of note, the majority of the middle-income CTs were distressed during the evaluation period. Three of the six moderate-income CTs are in Walker County and the presence of Sam Houston State University in one of the moderate-income CTs limits lending opportunities to this CT. In addition, Walker County is home to the Texas State Penitentiary in Huntsville, which also impacts lending to individuals in that AA and explains the low volume of owner-occupied homes and relatively high volume of vacant units. Four of the bank's six branches are located in this AA. Two branches are located in a moderate-income CT with the other two each located in a middle and upper-income CT. This AA accounted for a significant portion of the bank's deposits and loans at 94 percent and 77 percent, respectively. The Huntsville Non-MSA AA is more established and is more reflective of the overall level of lending activity for the bank.

The College Station-Bryan MSA AA consists of 47 CTs within Brazos and Robertson Counties. Each county has a branch and ATM. Of the 47 CTs, six are low-income, 13 are moderate-income, 14 are middle-income, 12 are upper-income, and two are unknown. The branch in Robertson County is located in a middle-income CT while the branch in Brazos County is located in an upper-income CT. The only low-income tract in Robertson County is eleven miles away from the branch in a small town that is primarily considered rural, resulting in little lending to this CT.

Brazos County is home to Texas A&M University. All five low-income tracts border the Texas A&M campus with the remaining moderate tracts within a few miles of the campus, which limits lending opportunities to these tracts that are composed primarily of rental units for student housing. Of the available housing units in the AA, 47 percent are rental units and 60 percent of the rental units are located in low- or moderate-income CTs.

Banking competition is moderate, particularly in the College Station-Bryan MSA AA. As of June 30, 2019, the Federal Deposit Insurance Corporation Market Share report listed 24 institutions operating 64 branches in the College Station-Bryan MSA AA. FNB Huntsville ranks 17th with a 0.45 percent market share and deposits totaling \$25 million. The largest depository institutions in the AA were Wells Fargo Bank, N.A., Prosperity Bank, and Branch Banking and Trust Company, which held a combined market share of 45 percent. In the Huntsville Non-MSA AA, FNB Huntsville ranked number one with a market share of 17 percent and deposits totaling \$384 million. Citizens State Bank and Prosperity Bank ranked second and third in market share, respectively.

### Community Contacts

We identified two community contacts during the evaluation, one in the College Station-Bryan AA and one in the Huntsville Non-MSA AA. Both contacts indicated a need for small business lending and affordable housing in the area. They also mentioned that local banks were receptive to participation with local organizations. These banks have shown an interest in originating small business and affordable housing loans. The Huntsville Non-MSA AA contact indicated that there were opportunities for banks to promote small business development through the local college.

### Huntsville Non-MSA AA

| Table A – Demographic Information of the Assessment Area  |         |               |                              |                  |                 |               |
|---|---------|---------------|------------------------------|------------------|-----------------|---------------|
| Assessment Area: Huntsville Non-MSA   |         |               |                              |                  |                 |               |
| Demographic Characteristics   | #       | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)   | 29      | 3.4           | 20.7                         | 58.6             | 17.2            | 0.0           |
| Population by Geography   | 137,341 | 2.2           | 20.9                         | 58.1             | 18.7            | 0.0           |
| Housing Units by Geography  | 59,804  | 2.4           | 19.4                         | 54.1             | 24.0            | 0.0           |
| Owner-Occupied Units by Geography   | 29,077  | 1.8           | 11.0                         | 57.6             | 29.5            | 0.0           |
| Occupied Rental Units by Geography  | 15,242  | 4.5           | 44.3                         | 39.3             | 11.9            | 0.0           |
| Vacant Units by Geography   | 15,485  | 1.5           | 10.6                         | 62.2             | 25.6            | 0.0           |
| Businesses by Geography   | 6,770   | 3.0           | 21.5                         | 49.7             | 25.8            | 0.0           |
| Farms by Geography  | 391     | 1.3           | 7.7                          | 62.4             | 28.6            | 0.0           |
| Family Distribution by Income Level   | 27,946  | 22.5          | 17.6                         | 18.7             | 41.3            | 0.0           |
| Household Distribution by Income Level  | 44,319  | 28.2          | 17.4                         | 15.7             | 38.8            | 0.0           |
| Median Family Income Non-MSAs - TX  |         | \$52,198      | Median Housing Value         |                  |                 | \$100,846     |
| <i>Source: 2015 ACS and 2019 D&amp;B Data<br/>Due to rounding, totals may not equal 100.0%<br/>(* ) The NA category consists of geographies that have not<br/>been assigned an income classification.</i> |         |               | Median Gross Rent            |                  |                 | \$743         |
|   |         |               | Families Below Poverty Level |                  |                 | 15.5%         |



## College Station-Bryan MSA AA

| <b>Table A – Demographic Information of the Assessment Area</b>  |          |                       |                              |                          |                         |                       |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: College Station-Bryan MSA</b>  |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>   | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)  | 47       | 12.8                  | 27.7                         | 29.8                     | 25.5                    | 4.3                   |
| Population by Geography  | 221,803  | 11.2                  | 32.1                         | 26.8                     | 25.9                    | 4.1                   |
| Housing Units by Geography   | 90,423   | 13.4                  | 31.4                         | 29.5                     | 25.8                    | 0.0                   |
| Owner-Occupied Units by Geography  | 37,393   | 2.8                   | 24.4                         | 31.6                     | 41.3                    | 0.0                   |
| Occupied Rental Units by Geography   | 42,530   | 22.0                  | 38.1                         | 25.5                     | 14.5                    | 0.0                   |
| Vacant Units by Geography  | 10,500   | 16.3                  | 29.0                         | 38.1                     | 16.6                    | 0.0                   |
| Businesses by Geography  | 14,296   | 7.8                   | 24.8                         | 30.6                     | 36.4                    | 0.3                   |
| Farms by Geography   | 579      | 4.7                   | 16.2                         | 40.1                     | 39.0                    | 0.0                   |
| Family Distribution by Income Level  | 44,696   | 24.6                  | 16.0                         | 17.5                     | 41.9                    | 0.0                   |
| Household Distribution by Income Level   | 79,923   | 27.6                  | 14.2                         | 15.0                     | 43.1                    | 0.0                   |
| Median Family Income MSA - 17780<br>College Station-Bryan, TX MSA  |          | \$60,756              | Median Housing Value         |                          |                         | \$148,188             |
|  |          |                       | Median Gross Rent            |                          |                         | \$869                 |
|  |          |                       | Families Below Poverty Level |                          |                         | 14.2%                 |
| <i>Source: 2015 ACS and 2019 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0%</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |          |                       |                              |                          |                         |                       |

## Scope of Evaluation in Texas

The rating for Texas is based on a full-scope review of both the Huntsville Non-MSA AA and College Station-Bryan MSA AA. However, more weight was given to the Huntsville Non-MSA AA due to the significant percentage of loan and deposit volume as well as the number of branches located within this AA. FNB Huntsville's branches and ATMs are all located within the AAs, as well as a majority of the bank's lending activities.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

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

### Conclusions for Areas Receiving a Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance is reasonable.

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

The bank exhibits reasonable geographic distribution of loans.

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

Refer to Table O 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 distribution of residential loans to borrowers in LMI geographies is excellent.

For the Huntsville Non-MSA AA, the bank did not originate any residential loans in low-income geographies but had excellent volume of loans in moderate-income geographies. During the evaluation period, there was only one low-income CT, limiting the number of residential loans made to this geography. The proportion of loans made in moderate-income CTs was significantly stronger than the proportion of both owner-occupied housing units and aggregate distribution of loans in those geographies.

For the College Station-Bryan MSA AA, the volume of loans in low- and moderate-income CTs was excellent. The proportion of loans made in low-income CTs was significantly stronger than both the owner-occupied units and aggregate distribution of loans in those geographies. For moderate-income CTs, residential loans were slightly less than the proportion of owner-occupied housing units but exceeded the aggregate distribution of loans in those geographies. Given that only 41 percent of the total housing units are owner-occupied, and 47 percent are rental units due to the presence of the university, residential lending to LMI geographies in this AA is considered excellent.

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

Refer to Table Q of 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 distribution of small loans to businesses in LMI geographies is reasonable.

For the Huntsville Non-MSA AA, the bank did not originate any small loans to businesses in low-income CTs; however, loans in moderate-income CTs was excellent. During the evaluation period, there was only one low-income CT, located in Houston County, with very little businesses in that CT, limiting the number of business loans made to this geography. The proportion of loans in moderate-income geographies exceeded both the proportion of businesses located in those geographies and aggregate distribution of loans.

For the College Station-Bryan MSA AA, the bank did not originate any small loans to businesses in low-income CTs and originated a very low volume of loans in moderate-income CTs. However, all the low-income tracts in Brazos County border the university and there are not many business opportunities in those tracts. The one low-income tract in Robertson County is in a predominately rural area, also limiting lending opportunities. The moderate-income tracts in Brazos County are located several miles from the branch and those tracts primarily consist of hotels. In addition, competition in this area is intense and there are other institutions closer to these moderate-income tracts, which impacts business lending opportunities.

### ***Consumer Loans***

Refer to Table U of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is reasonable.

For the Huntsville Non-MSA AA, the distribution of consumer loans in low-income CTs exceeded the area demographics for the AA and was near to the demographic comparator for moderate-income CTs. This demonstrates excellent performance especially given that there is only one low-income CT. Additionally, the distribution of loans to middle-income CTs, of which the majority were distressed during the evaluation period, were in line with the demographic comparator.

For the College Station-Bryan MSA AA, there were no loans made in low- or moderate-income CTs. As previously mentioned, the majority of the low-income and moderate-income CTs border the Texas A&M University campus. As a result, the majority population in these tracts consist of students, which explains the low penetration.

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

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

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

Refer to Table P 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 residential loans to LMI borrowers is reasonable.

For the Huntsville Non-MSA AA, the bank's proportion of loans to low-income borrowers was significantly below the proportion of low-income families but exceeded the aggregate distribution of loans to those families. The bank's proportion of loans to moderate-income borrowers was below the proportion of moderate-income families but near to the aggregate distribution of loans to those families.

For the College Station-Bryan MSA AA, the bank's proportion of loans to low-income borrowers was significantly below the proportion of low-income families but was near to the aggregate distribution of loans to those families. The bank's proportion of loans to moderate-income borrowers was below the proportion of moderate-income families but consistent with the aggregate distribution of loans to those families. Of note, the median housing value in this AA is \$148,188 with the median family income of \$60,756, making it difficult for LMI borrowers to qualify for mortgages.

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

Refer to Table R 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 by revenue is excellent.

For the Huntsville Non-MSA AA, the distribution of small loans to businesses was slightly lower than the comparator demographic but significantly exceeded the aggregate industry data.

For the College Station MSA AA, the distribution of small loans to businesses exceeded both the comparator demographic and aggregate industry data.

### ***Consumer Loans***

Refer to Table V of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to LMI borrowers is considered reasonable, given the performance context.

For the Huntsville Non-MSA AA, the distribution of consumer loans to both low- and moderate-income borrowers was significantly lower than the demographics of the AA households. However, the demographic comparators are high and the fact that the bank had some penetration to these borrowers is considered reasonable. Although the analysis indicates somewhat low distribution to LMI borrowers, internal bank reports indicate that approximately 43 percent of all consumer loans made throughout the evaluation period were for loan amounts less than \$5,000 with loans as small as \$200.

For the College Station-Bryan MSA AA, the bank did not originate any loans to low-income borrowers. The distribution of consumer loans to moderate-income borrowers is somewhat lower than the demographics of the AA households and considered reasonable. Similar to the Huntsville Non-MSA AA, approximately 39 percent of consumer loans made to this AA were for loan amounts less than \$5,000 with the smallest loan at \$770.

### **Responses to Complaints**

FNB Huntsville did not receive any CRA-related complaints during the evaluation period.

## **COMMUNITY DEVELOPMENT TEST**

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

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

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

## Number and Amount of Community Development Loans

Refer to the CD Loan Table below for the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

| <i>Community Development Loans</i> |       |              |           |               |
|------------------------------------|-------|--------------|-----------|---------------|
| Assessment Area                    | Total |              |           |               |
|                                    | #     | % of Total # | \$(000's) | % of Total \$ |
| College Station-Bryan MSA AA       | 3     | 30           | 791       | 27            |
| Huntsville Non-MSA AA              | 7     | 70           | 2,131     | 73            |

FNB Huntsville made a reasonable level of CD loans in both AAs. During the evaluation period, the bank originated ten loans totaling \$2.9 million. The bank effectively helped meet community credit needs by supporting community services to LMI individuals and affordable housing, as well as revitalization and stabilization as part of a city plan. One of the loans in the Huntsville Non-MSA AA was to the Boys and Girls Club of Walker County for \$1.4 million for the construction of a new facility targeted to LMI youth. The volume of CD lending in this AA was equivalent to 4.1 percent of the allocated tier 1 capital. For College Station-Bryan MSA AA, the volume of CD lending was equivalent to 24.2 percent of the allocated tier 1 capital.

## Number and Amount of Qualified Investments

| Assessment Area              | Prior Period* |           | Current Period |           | Total |              |           |               |
|------------------------------|---------------|-----------|----------------|-----------|-------|--------------|-----------|---------------|
|                              | #             | \$(000's) | #              | \$(000's) | #     | % of Total # | \$(000's) | % of Total \$ |
| College Station-Bryan MSA AA | 1             | 1,657     | 8              | 157       | 9     | 22           | 1,814     | 22            |
| Huntsville Non-MSA AA        | 3             | 4,584     | 29             | 1,985     | 32    | 78           | 6,569     | 78            |

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

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. The table includes all CD investments, including prior period investments that remain outstanding as of the examination date. The volume of investments made during the evaluation period in both AAs was excellent. FNB Huntsville allocated \$2.1 million to three qualified investments that provided community services to LMI individuals and two which provided economic development. There were also four prior period investments in the amount of \$6.2 million, bringing the total number of investments to nine totaling \$8.3 million. There were no unfunded commitments during the evaluation period. FNB Huntsville's total investments to the College Station-Bryan MSA AA represented 55.4 percent of tier 1 capital allocated to this AA. For the Huntsville Non-MSA AA, investments totaled 12.6 percent of the allocated tier 1 capital. In addition, the bank has a technology platform known as EverFi, which assists bank management with the teaching of financial literacy basics for grades 9-12 as well as adults of all ages for both AAs. This software was utilized in both AAs to teach LMI individuals. FNB Huntsville also donated \$23,250 to 21 organizations in the AAs. A majority of the bank's investments helped organizations provide community services to LMI individuals.

**Extent to Which the Bank Provides CD Services**

FNB Huntsville provided 16 qualified CD services within the AAs. Bank employees provided a total of 3,142 hours of service with a majority providing community services that benefit LMI individuals; however, two organizations helped support affordable housing. A number of employees held leadership positions through board membership, while other employees provided financial assistance and/or literacy to organizations that target services to LMI individuals.

## Appendix A: Scope of Examination

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

|   |   |  |
|---|---|--|
| <b>Time Period Reviewed:</b>                            |   |  |
| Lending Test  | 01/01/2017 – 12/31/2019   |  |
| CD Test   | 05/09/2017 – 12/31/2019   |  |
| <b>Bank Products Reviewed:</b>                          | Home mortgage, small business, consumer loans<br>CD loans, qualified investments and donations, CD services |  |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b>   | <b>Products Reviewed</b>   |
| 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>Texas</b>  |   |  |
| Huntsville Non-MSA AA                                   | Full-scope  | Leon County, Madison County, Houston County, Trinity County, Walker County |
| College Station-Bryan MSA AA                            | Full-scope  | Robertson County and Brazos County   |
|   |   |  |
|   |   |  |

## Appendix B: Summary of MMSA and State Ratings

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| RATINGS First National Bank of Huntsville |                      |                |                           |
|---|----------------------|----------------|---------------------------|
| Overall Bank:                             | Lending Test Rating* | CD Test Rating | Overall Bank/State Rating |
|   | Satisfactory         | Satisfactory   | Satisfactory              |
| State:                                    |                      |                |                           |
| Texas                                     | Satisfactory         | Satisfactory   | Satisfactory              |

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



## Appendix C: Definitions and Common Abbreviations

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

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

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/AA.

**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. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, CTs 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:** ACT delineated by the U.S. Census Bureau in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), 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 CT 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 (MSA):** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The MSA comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a 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 multistate metropolitan statistical area (MMSA). 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 MMSA, the institution will receive a rating for the MMSA.

**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 (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 MMSAs, 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/AA. Deposit data are compiled by the FDIC and are available as of June 30th 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/AA. 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 AA.
- 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 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/AA

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017-19**

| Assessment Area:          | Total Home Mortgage Loans |               |              |                | Low-Income Tracts                 |              |            | Moderate-Income Tracts            |              |             | Middle-Income Tracts              |              |             | Upper-Income Tracts               |              |             | Not Available-Income Tracts       |              |            |
|---------------------------|---------------------------|---------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|
|                           | #                         | \$(000's)     | % 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  |
| College Station-Bryan MSA | 126                       | 27,932        | 24.1         | 5,617          | 2.8                               | 9.5          | 4.6        | 24.4                              | 21.4         | 20.5        | 31.6                              | 45.2         | 28.1        | 41.3                              | 23.8         | 46.7        | 0.0                               | 0.0          | 0.0        |
| Huntsville Non MSA        | 397                       | 48,943        | 75.9         | 2,211          | 1.8                               | 0.0          | 1.5        | 11.0                              | 19.9         | 10.3        | 57.6                              | 42.8         | 51.1        | 29.5                              | 37.3         | 37.1        | 0.0                               | 0.0          | 0.0        |
| <b>Total</b>              | <b>523</b>                | <b>76,875</b> | <b>100.0</b> | <b>7,828</b>   | <b>2.4</b>                        | <b>2.3</b>   | <b>3.7</b> | <b>18.5</b>                       | <b>20.3</b>  | <b>17.7</b> | <b>43.0</b>                       | <b>43.4</b>  | <b>34.6</b> | <b>36.1</b>                       | <b>34.0</b>  | <b>44.0</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |

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

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017-19**

| Assessment Area:          | Total Home Mortgage Loans |               |              |                | Low-Income Borrowers |              |            | Moderate-Income Borrowers |              |             | Middle-Income Borrowers |              |             | Upper-Income Borrowers |              |             | Not Available-Income Borrowers |              |             |
|---------------------------|---------------------------|---------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
|                           | #                         | \$(000's)     | % of Total   | Overall Market | % Families           | % Bank Loans | Aggregate  | % Families                | % Bank Loans | Aggregate   | % Families              | % Bank Loans | Aggregate   | % Families             | % Bank Loans | Aggregate   | % Families                     | % Bank Loans | Aggregate   |
| College Station-Bryan MSA | 126                       | 27,932        | 24.1         | 5,617          | 24.6                 | 1.6          | 2.7        | 16.0                      | 10.3         | 10.9        | 17.5                    | 9.5          | 19.5        | 41.9                   | 52.4         | 53.3        | 0.0                            | 26.2         | 13.5        |
| Huntsville Non MSA        | 397                       | 48,943        | 75.9         | 2,211          | 22.5                 | 3.5          | 1.9        | 17.6                      | 9.8          | 10.3        | 18.7                    | 18.9         | 20.4        | 41.3                   | 56.9         | 53.9        | 0.0                            | 10.8         | 13.5        |
| <b>Total</b>              | <b>523</b>                | <b>76,875</b> | <b>100.0</b> | <b>7,828</b>   | <b>23.8</b>          | <b>3.1</b>   | <b>2.5</b> | <b>16.6</b>               | <b>9.9</b>   | <b>10.7</b> | <b>18.0</b>             | <b>16.6</b>  | <b>19.7</b> | <b>41.6</b>            | <b>55.8</b>  | <b>53.5</b> | <b>0.0</b>                     | <b>14.5</b>  | <b>13.5</b> |

Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 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> |  |
|---|---------------------------------|--------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|----------------|--|
| Assessment Area:  | Total Loans to Small Businesses |              |              |                | Low-Income Tracts |              |            | Moderate-Income Tracts |              |             | Middle-Income Tracts |              |             | Upper-Income Tracts |              |             | Not Available-Income Tracts |              |                |  |
|   | #                               | \$(000's)    | % of Total   | Overall Market | % Businesses      | % Bank Loans | Aggregate  | % Businesses           | % Bank Loans | Aggregate   | % Businesses         | % Bank Loans | Aggregate   | % Businesses        | % Bank Loans | Aggregate   | % Businesses                | % Bank Loans | Aggregate      |  |
| College Station-Bryan MSA   | 20                              | 536          | 23.3         | 4,002          | 7.8               | 0.0          | 4.6        | 24.8                   | 5.0          | 24.6        | 30.6                 | 65.0         | 30.9        | 36.4                | 30.0         | 39.9        | 0.3                         | 0.0          | 0.0            |  |
| Huntsville Non-MSA  | 66                              | 4,085        | 76.7         | 1,914          | 3.0               | 0.0          | 1.1        | 21.5                   | 22.7         | 16.5        | 49.7                 | 53.0         | 53.0        | 25.8                | 24.4         | 29.3        | 0.0                         | 0.0          | 0.0            |  |
| <b>Total</b>  | <b>86</b>                       | <b>4,621</b> | <b>100.0</b> | <b>5,916</b>   | <b>6.3</b>        | <b>0.0</b>   | <b>3.5</b> | <b>23.7</b>            | <b>18.60</b> | <b>22.0</b> | <b>36.7</b>          | <b>55.81</b> | <b>38.0</b> | <b>33.0</b>         | <b>25.58</b> | <b>36.5</b> | <b>0.2</b>                  | <b>0.00</b>  | <b>0.0</b>     |  |

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA 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>2017-19</b> |  |
|--|---------------------------------|--------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|----------------|--|
| Assessment Area:   | Total Loans to Small Businesses |              |              |                | Businesses with Revenues <= 1MM |              |             | Businesses with Revenues > 1MM |              | Businesses with Revenues Not Available |              |                |  |
|  | #                               | \$(000's)    | % of Total   | Overall Market | % Businesses                    | % Bank Loans | Aggregate   | % Businesses                   | % Bank Loans | % Businesses                           | % Bank Loans |                |  |
| College Station-Bryan MSA  | 20                              | 536          | 23.3         | 4,002          | 82.2                            | 85.0         | 39.0        | 4.4                            | 10.0         | 13.3                                   | 5.0          |                |  |
| Huntsville Non-MSA   | 66                              | 4,085        | 76.7         | 1,914          | 83.2                            | 78.8         | 38.0        | 4.2                            | 9.1          | 12.6                                   | 12.1         |                |  |
| <b>Total</b>   | <b>86</b>                       | <b>4,621</b> | <b>100.0</b> | <b>5,916</b>   | <b>82.5</b>                     | <b>80.2</b>  | <b>38.7</b> | <b>4.4</b>                     | <b>9.3</b>   | <b>13.1</b>                            | <b>10.5</b>  |                |  |

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*



| <b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b> |                      |            |              |                   |              |                        |              |                      |              |                     |              |                             | <b>2017-19</b> |  |
|--|----------------------|------------|--------------|-------------------|--------------|------------------------|--------------|----------------------|--------------|---------------------|--------------|-----------------------------|----------------|--|
| Assessment Area:   | Total Consumer Loans |            |              | Low-Income Tracts |              | Moderate-Income Tracts |              | Middle-Income Tracts |              | Upper-Income Tracts |              | Not Available-Income Tracts |                |  |
|  | #                    | \$(000's)  | % of Total   | % of Households   | % Bank Loans | % of Households        | % Bank Loans | % of Households      | % Bank Loans | % of Households     | % Bank Loans | % of Households             | % Bank Loans   |  |
| College Station-Bryan MSA  | 22                   | 237        | 25.6         | 13.0              | 0.0          | 31.7                   | 0.0          | 28.3                 | 81.8         | 27.0                | 18.2         | 0.0                         | 0.0            |  |
| Huntsville Non-MSA   | 64                   | 633        | 74.4         | 2.7               | 6.3          | 22.5                   | 17.2         | 51.3                 | 50.0         | 23.5                | 26.6         | 0.0                         | 0.0            |  |
| <b>Total</b>   | <b>86</b>            | <b>870</b> | <b>100.0</b> | <b>9.3</b>        | <b>4.7</b>   | <b>28.4</b>            | <b>12.8</b>  | <b>36.5</b>          | <b>58.1</b>  | <b>25.7</b>         | <b>24.4</b>  | <b>0.0</b>                  | <b>0.0</b>     |  |

*Source: 2015 ACS Census; 01/01/2017 – 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%*

| <b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b> |                      |            |              |                      |              |                           |              |                         |              |                        |              |                                | <b>2017-19</b> |  |
|--|----------------------|------------|--------------|----------------------|--------------|---------------------------|--------------|-------------------------|--------------|------------------------|--------------|--------------------------------|----------------|--|
| Assessment Area:   | Total Consumer Loans |            |              | Low-Income Borrowers |              | Moderate-Income Borrowers |              | Middle-Income Borrowers |              | Upper-Income Borrowers |              | Not Available-Income Borrowers |                |  |
|  | #                    | \$(000's)  | % of Total   | % of Households      | % Bank Loans | % of Households           | % Bank Loans | % of Households         | % Bank Loans | % of Households        | % Bank Loans | % of Households                | % Bank Loans   |  |
| College Station-Bryan MSA  | 22                   | 237        | 25.6         | 27.6                 | 0.0          | 14.2                      | 9.1          | 15.0                    | 36.4         | 43.1                   | 54.6         | 0.0                            | 0.0            |  |
| Huntsville Non-MSA   | 64                   | 633        | 74.4         | 28.2                 | 10.9         | 17.4                      | 6.3          | 15.7                    | 20.3         | 38.8                   | 50.0         | 0.0                            | 12.5           |  |
| <b>Total</b>   | <b>86</b>            | <b>870</b> | <b>100.0</b> | <b>27.9</b>          | <b>8.1</b>   | <b>15.4</b>               | <b>10.5</b>  | <b>15.2</b>             | <b>22.1</b>  | <b>41.5</b>            | <b>50.0</b>  | <b>0.0</b>                     | <b>9.3</b>     |  |

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