

### PUBLIC DISCLOSURE

August 13, 2018

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Stockmens National Bank in Cotulla Charter Number 14302

206 North Main Street Cotulla, Texas 78014

Office of the Comptroller of the Currency

San Antonio South Field Office 10001 Reunion Place, Suite 250 San Antonio, TX 78216-4133

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: This institution is rated SATISFACTORY.

### The Lending Test is rated: SATISFACTORY.

The bank's lending performance reflects a satisfactory record of meeting community needs in its assessment area (AA). Factors supporting the institution's rating include:

- The bank's loan-to-deposit ratio is reasonable given the institution's size, financial condition, and AA credit needs.
- A substantial majority of lending and lending-related activities originate in the institution's AA.
- The distribution of borrowers reflects reasonable penetration among individuals of different income levels.
- There is no evidence of illegal discrimination.

### **Definitions and Common Abbreviations**

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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, loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**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 MA/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. 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 it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**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.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

Rated Area: A rated area is a state or multi-state metropolitan 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 area, the institution will receive a rating for the multi-state metropolitan 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 One 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.

# **Description of Institution**

Stockmens National Bank in Cotulla (SNB) is a full service community bank headquartered in Cotulla, Texas. The bank was chartered in 1904, and has operated in La Salle County since inception. As of June 30, 2018, SNB reported total assets of \$105 million and tier one capital of \$10 million, representing a 10 percent tier one capital leverage ratio. SNB has no holding company. The bank's only location is in Cotulla, Texas, 90 miles southwest of San Antonio, Texas.

In addition to a full range of residential and commercial banking products and services, the bank offers online and mobile banking through its internet website <a href="https://snbcotulla.com">https://snbcotulla.com</a>. The bank's website and phone application allow customers to review account activity, transfer funds between accounts, view cleared checks, view online statements, and perform Bill Pay. SNB also offers telephone banking, providing customers with 24/7 access to account balances, loan balances, and account transactions.

SNB reported net loans of \$13 million, as of June 30, 2018, comprising 13 percent of the bank's total assets. SNB's primary loan products were identified as consumer loans and 1-4 family residential real estate loans. The following table reflects the loan portfolio composition by loan type.

| Loan Portfolio Composition               | n as of June 30, 2018 |                  |
|--|-----------------------|------------------|
| Loan Type                                | Volume (000s)         | % of Total Loans |
| 1-4 Family Residential Real Estate Loans | \$6,296               | 47%              |
| Commercial & Industrial Loans            | \$2,286               | 17%              |
| Agricultural Loans                       | \$1,452               | 11%              |
| Loans to Individuals                     | \$2,301               | 17%              |
| Other Loans                              | \$1,081               | 8%               |
| Total Loans:                             | \$13,416              | 100%             |

Source: June 30, 2018 Call Report

SNB faces nominal competition from other local financial institutions in their AA, as SNB is the only financial institution in La Salle County. According to the FDIC Deposit Market Share report, as of June 30, 2017, SNB accumulated 100 percent of the deposit market share of La Salle County.

The previous CRA examination, dated May 5, 2014, rated SNB CRA performance as "Satisfactory" under the small bank examination procedures. Based on its financial condition, the local economy, product offerings, and competition, SNB has the ability to meet the various credit needs in its community. There are no legal, financial, or other factors that impact SNB's ability to meet credit needs in its AA. SNB's current business strategy is to continue to support the local community through the offering of generic, non-complex, loan products.

# Scope of the Evaluation

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

The Office of the Comptroller of Currency (OCC) evaluated SNB's CRA performance utilizing interagency small bank examination procedures, which includes a lending test. The CRA lending test evaluates the bank's record of meeting credit needs of its AA through its primary lending activities. The evaluation period of the lending test was January 1, 2015 to December 31, 2017. The evaluation period uses the most current U.S. Census data for each data set included in the analysis.

The OCC analyzed loans that were originated and purchased during the evaluation period, to identify the bank's primary loan products. Examiners identified 1-4 family residential loans and consumer loans as SNB's primary products, based on the quantity and dollar volume of loans originated during the lending test period. A sample of 19 1-4 family residential loans and 21 consumer loans originated during the evaluation period were tested to determine SNB's CRA performance under the lending test. The table below shows the breakdown of all loans that SNB originated or purchased during the evaluation period.

| Loan Originations and Purchases          | By Loan Type During the | Evaluation Period |
|--|-------------------------|-------------------|
| Loan Type                                | % by Number of Loans    |                   |
| 1-4 Family Residential Real Estate Loans | 24                      | 3                 |
| Commercial & Industrial Loans            | 17                      | 4                 |
| Agricultural Loans                       | 8                       | 3                 |
| Loans to Individuals                     | 28                      | 83                |
| Other Loans                              | 23                      | 7                 |
| Total                                    | 100                     | 100               |

Source: Internal Bank Reports

### **Data Integrity**

The bank is not a Home Mortgage Disclosure Act (HMDA) data reporter, therefore, full-scope data integrity procedures were not performed. Data integrity was validated through analysis of the loan files as part of the lending test. Data was found to be reliable as there were no data integrity issues identified.

### Selection of Areas for Full-Scope Review

SNB has designated only one AA, which consists wholly of La Salle County, Texas. Examiner review of the AA selection determined that the AA meets regulatory requirements, as it consists of whole geographies and does not reflect illegal discrimination or arbitrarily exclude any low- or moderate-income geographies. Examiners conducted a full-scope review for the AA.

# Ratings

The bank's overall rating is based on the full-scope review of its only AA. Both identified primary products (1-4 family residential and consumer) were given equal weighting in determining the institution's lending test rating.

# **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 assessment area 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution [or any affiliate whose loans have been considered as part of the institution's lending performance] has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

# **Conclusions with Respect to Performance Tests**

#### LENDING TEST

SNB's performance under the lending test is **SATISFACTORY**, and management has been successful in meeting the credit needs of its AA. The results of the lending test indicate that SNB has maintained a reasonable loan-to-deposit ratio, originated a substantial majority of loans inside the AA, and produced satisfactory lending penetration to borrowers of low- to moderate-income (LMI) levels. A geographic distribution analysis was deemed not meaningful due to bank's AA including only one census tract.

#### Loan-to-Deposit Ratio

SNB's loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and the credit needs of its AA. The bank's quarterly LTD ratio averaged 18 percent over the 16 quarters since the previous CRA examination. During this timeframe, the institution's LTD ratio reached a low of 14 percent and a high of 22 percent.

SNB's quarterly average LTD ratio compares favorably to those of other community banks of similar sizes, locations, and product offerings. Similarly situated institutions (SSI) that serve similar AAs were identified as Zavala County Bank, Atascosa Bank, and Dilley State Bank. SNB's average quarterly LTD ratio ranks first among SSIs. The remaining three banks produced an average LTD ratio of 15 percent, with a range of 14 percent to 17 percent.

| Loan-to-Deposit Ratio              |                       |                                |  |  |  |  |  |  |  |  |  |
|------------------------------------|-----------------------|--------------------------------|--|--|--|--|--|--|--|--|--|
| Institution                        | Total Assets (\$000s) | Average Quarterly<br>LTD Ratio |  |  |  |  |  |  |  |  |  |
| Stockmens National Bank in Cotulla | 103,703               | 18%                            |  |  |  |  |  |  |  |  |  |
| Zavala County Bank                 | 62,473                | 17%                            |  |  |  |  |  |  |  |  |  |
| Atascosa Bank                      | 91,564                | 15%                            |  |  |  |  |  |  |  |  |  |
| Dilley State Bank                  | 128,123               | 14%                            |  |  |  |  |  |  |  |  |  |

Source: Institution Reports of Condition from June 2014 to March 2018

The table below illustrates SNB's trends in total assets, loans, deposits, and their effect on the LTD ratio over the prior four year-ends since the previous CRA examination.

|                             | 12/31/2017 | 12/31/2016 | 12/31/2015 | 12/31/2014 |
|-----------------------------|------------|------------|------------|------------|
| Average Total Assets (000s) | \$103,528  | \$90,650   | \$107,580  | \$124,215  |
| Net Loans & Leases (000s)   | \$13,111   | \$17,742   | \$19,298   | \$19,359   |
| Total Deposits (000s)       | \$94,582   | \$88,364   | \$94,836   | \$120,352  |
| Loan-to-Deposit Ratio       | 13.86%     | 20.08%     | 20.35%     | 16.09%     |

Source: Institution Reports of Condition from June 2014 to March 2018

SNB's LTD ratio has experienced a significant decline since the previous CRA examination. As the only financial institution in the AA, healthy oil and gas income has presented SNB with sustained low loan demand and fluctuating deposit volumes. SNB supports loan growth within the AA, but has experienced difficulties in maintaining loan volume due to inflated local real estate values and loan payoffs. SNB's LTD ratio is comparable to SSIs that are located in communities that are also affected by Eagle Ford Shale oil activity.

#### **Lending in Assessment Area**

Lending in the AA is considered outstanding as SNB originated a substantial majority of their primary loan products inside the AA during the evaluation period. All 19 1-4 family residential real estate loans and a representative sample of 20 consumer loans originated during the evaluation period were selected to represent the bank-wide proportion of lending inside versus outside the bank's AA. The following table reflects the bank's lending performance in its AA by number and dollar volume of loans originated or purchased during the evaluation period:

|                        | Table 1 - Lending in La Salle County AA |      |     |        |       |                  |     |         |    |        |  |  |  |
|------------------------|---|------|-----|--------|-------|------------------|-----|---------|----|--------|--|--|--|
|                        |   | Num  | ber | of Loa | ıns   | Dollars of Loans |     |         |    |        |  |  |  |
|                        | In                                      | side | Ou  | tside  | Total | Inside           | Э   | Outside | Э  | Total  |  |  |  |
| Loan Type              | #                                       | %    | #   | %      |       | \$000s           | %   | \$000s  | %  | \$000s |  |  |  |
|                        |   |      |     |        |       |                  |     |         |    |        |  |  |  |
| 1-4 Family Residential | 19                                      | 100  | 0   | 0      | 19    | 2,163            | 100 | 0       | 0  | 2,163  |  |  |  |
| Loans to Individuals   | 19                                      | 95   | 1   | 5      | 20    | 237              | 87  | 36      | 13 | 273    |  |  |  |
| Totals                 | 38                                      | 97   | 1   | 3      | 39    | 2,400            | 99  | 36      | 1  | 2,436  |  |  |  |

Source: 1/1/2015-12/31/2017 Bank Data

#### **Geographic Distribution of Loans**

The geographic distribution of loans was not evaluated as part of the CRA lending test. A meaningful analysis could not be performed for the geographic distribution of loans, as the bank's AA has only one census tract. The bank's AA consists solely of La Salle County, and the 9503.00 census tract.

#### Lending to Borrowers of Different Incomes and to Businesses of Different Sizes

The distribution of borrowers reflects reasonable penetration among individuals of different income levels. An analysis of lending to borrowers of different incomes was performed for the bank's primary products, utilizing a sample of 19 1-4 family residential and 20 consumer loans that were originated within the institution's AA. Loans originated in 2015 and 2016 were evaluated separately than those originated in 2017, due to updated American Community Survey (ACS) census data being used for 2017. No significant disparities of borrower distribution in the AA were identified. Examiners considered other factors such as rising home values, and the strengthening of the oil and gas economy as mitigating factors to decreased LMI lending.

Refer to **Table P (Home Mortgage)** and **Table V (Consumer)** in **Appendix C** for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

#### 1-4 Family Residential Real Estate Loans

The distribution of the bank's home mortgage loans to LMI borrowers reflects reasonable penetration among borrowers of different income levels. The proportion of bank loans was generally comparable to the proportion of LMI families within the AA, and comparable to the aggregate distribution of loans originated in the AA by HMDA reporting institutions. The lending test included all 1-4 family residential real estate loans originated between January 1, 2015, and December 31, 2017. The sample was comprised of all three loans originated in 2017, and all 16 loans originated in 2015 and 2016.

During 2015 and 2016, SNB made 25 percent of its 1-4 family residential real estate loans to moderate-income borrowers, and zero residential real estate loans to low-income borrowers. The bank's level of LMI penetration compares slightly lower than the AA distribution of LMI families, but similar to aggregate loan data. An aggregate of 26 percent of loans originated within the AA in 2016 were to LMI borrowers. The bank's performance of 25 percent of loans originated to LMI borrowers represents reasonable penetration of borrowers of different income levels, when compared to 2016 HMDA aggregate data.

Although the proportion of loans to LMI borrowers is lower compared to the proportion of LMI families, the bank and industry performance was impacted by a rising housing value to income ratio within the AA. Home values continue to rise due to increased demand from oil and gas related renters and home buyers. The increased cost of 1-4 family residential real estate properties within the AA constrains lending opportunities to LMI borrowers, as the proportion of properties affordable to LMI families is limited.

#### Consumer Loans

The distribution of the bank's consumer loans to LMI borrowers reflects reasonable penetration among borrowers of different income levels. The representative sample included eight loans originated during 2017, and 12 loans originated during 2015 and 2016. In 2017, the proportion of loans to low-income borrowers exceeded the proportion of low-income households and was generally comparable in years 2015 and 2016. A cumulative total of the consumer loan sample illustrates SNB originated 35 percent of loans to low-income borrowers, and 5 percent to moderate-income borrowers. In total, 40 percent of the consumer loans sampled during the evaluation period were originated to LMI borrowers, which is generally comparable to the proportion of LMI households in the AA. SNB originates a substantial amount, by number of loans, of the loan portfolio via consumer loans. Without any other financial institutions located within the bank's AA, SNB is able to support a significant portion of the community, particularly LMI households, through small dollar consumer lending.

# **Responses to Complaints**

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

# **Appendix A: Scope of Examination**

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 metropolitan and nonmetropolitan areas 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").

| Time Period Reviewed                                 | Lending Test: (01/01/2    | 2015 to 12/31/2017)   |
|--|---------------------------|---|
| Financial Institution                                |                           | Products Reviewed   |
| Stockmens National Bank in Cotulla<br>Cotulla, Texas | a                         | 1-4 Family Residential Real Estate Loans<br>Consumer Loans  |
| Affiliate(s)   | Affiliate<br>Relationship | Products Reviewed   |
| Not Applicable                                       | Not Applicable            | Not Applicable  |
| List of Assessment Areas and Ty                      | pe of Examination         |   |
| Assessment Area                                      | Type of Exam              | Other Information   |
| La Salle County Non-MSA AA                           | Full-Scope                | The bank's only AA consists 100% of La Salle County. La Salle County contains one CT that is classified as middle-income. |

# **Appendix B: Community Profiles for Full-Scope Areas**

### La Salle County AA

| Table A – Demo                            | graphic Ir | nformation    | of the Asses       | sment Area       | 1               |               |
|---|------------|---------------|--------------------|------------------|-----------------|---------------|
| ,   | Assessme   | nt Area: La   | Salle AA           |                  |                 |               |
| Demographic Characteristics               | #          | Low<br>% of # | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)               | 1          | 0.0           | 0.0                | 100.0            | 0.0             | 0.0           |
| Population by Geography                   | 7,191      | 0.0           | 0.0                | 100.0            | 0.0             | 0.0           |
| Housing Units by Geography                | 2,923      | 0.0           | 0.0                | 100.0            | 0.0             | 0.0           |
| Owner-Occupied Units by Geography         | 1,387      | 0.0           | 0.0                | 100.0            | 0.0             | 0.0           |
| Occupied Rental Units by Geography        | 584        | 0.0           | 0.0                | 100.0            | 0.0             | 0.0           |
| Vacant Units by Geography                 | 952        | 0.0           | 0.0                | 100.0            | 0.0             | 0.0           |
| Businesses by Geography                   | 305        | 0.0           | 0.0                | 100.0            | 0.0             | 0.0           |
| Farms by Geography                        | 23         | 0.0           | 0.0                | 100.0            | 0.0             | 0.0           |
| Family Distribution by Income Level       | 1,331      | 24.8          | 24.0               | 23.8             | 27.4            | 0.0           |
| Household Distribution by Income<br>Level | 1,971      | 30.6          | 12.2               | 27.4             | 29.7            | 0.0           |
| Median Family Income Non-MSAs - TX        |            | \$52,076      | Median Hous        | sing Value       |                 | \$70,100      |
|   |            |               | Median Gros        | s Rent           |                 | \$433         |
|   |            |               | Families Bel       | ow Poverty L     | _evel           | 13.4%         |

Source: 2015 ACS Census and 2017 D&B Data Due to rounding, totals may not equal 100.0

(\*) The NA category consists of geographies that have not been assigned an income classification.

#### La Salle County Description

The bank has designated their AA as La Salle County, Texas, a non-metropolitan statistical area with approximately 7,584 people and 2,101 households, according to the 2017 Census population estimate. This AA meets the requirements of the CRA regulation and does not arbitrarily exclude LMI geographies. La Salle County consists of one census tract, which was classified as middle-income during the 2015 ACS Census. La Salle County includes three incorporated communities, Cotulla, Encinal, and Fowlerton, representing populations of 4,178, 587, and 55, respectively. Cotulla serves as the county seat and major employment center of the AA. Cotulla is located 90 miles southwest of San Antonio.

Economic activity in La Salle County is concentrated in agriculture, outdoor recreation, healthcare and social assistance, oil and gas extraction, and utilities. The economy is largely agriculture based, with private ranches hosting outdoor recreational activities making up the majority. Other major employers in the area include EOG Resources, EP Energy, Cotulla ISD, and La Salle County. Tourism for outdoor recreation and oil and gas activity plays an important role in the economy of La Salle County.

La Salle County continues to be faced with the lingering effects of a booming oil economy. The 2016 ACS Census data indicates a median housing value of \$63,500, and median rent of \$384 per month. However, this survey utilizes data from a period when oil prices were at a record low, and local oil and gas activity was virtually non-existent. Per discussion with local community members, oil and gas employees have continued seeking local housing, increasing local home values and rental rates. Consequently, the availability of local affordable housing remains low.

The 2016 ACS estimated the median household income in La Salle County to be \$40,094, and per capita income of \$23,939. Meanwhile, the unemployment rate for La Salle County is listed at 8.4 percent, which is higher than the state of Texas at 3.8 percent and the national rate of 3.9 percent. Local community members explained that local unemployment rates remain moderate due to the oil and gas activity attracting many employees from outside of the AA. Oil and gas activity continues to bolster the local economy through business sales, rental income, employment opportunities, and tax revenue. This is apparent through the gradual increase in median household income, and the recent AA upgrade in census tract income level from moderate to middle.

### **Community Contacts**

As part of this evaluation, examiners assessed the credit needs and opportunities in the La Salle County AA by interviewing a community contact. The community organization contacted during this evaluation focuses on serving the academic needs of La Salle County. The community contact did not identify any immediate opportunities for improving access to credit or financial literacy in the community. The contact stated that financial institutions in the area are involved in the community and are meeting its credit needs.

# **Appendix C: Tables of Performance Data**

### **Content of Standardized Tables**

The following is a listing and brief description of the tables included in the appendix:

- **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 MA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table V. 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 to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MA/assessment area.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2017

|                     | Te |              | me Mo<br>.oans     | Low-Income Borrowers |          |                    | Moderate-Income<br>Borrowers |               |                    | Middle-Income Borrowers |               |                    | Upper-Income Borrowers |               |                    | Not Available-Income<br>Borrowers |               |                    |           |
|---------------------|----|--------------|--------------------|----------------------|----------|--------------------|------------------------------|---------------|--------------------|-------------------------|---------------|--------------------|------------------------|---------------|--------------------|-----------------------------------|---------------|--------------------|-----------|
| Assessment<br>Area: |    | \$<br>(000s) | % of<br>Total<br># | Overaii              | Families | %<br>Bank<br>Loans | Aggregate                    | %<br>Families | %<br>Bank<br>Loans | Aggregate               | %<br>Families | %<br>Bank<br>Loans | Aggregate              | %<br>Families | %<br>Bank<br>Loans | Aggregate                         | %<br>Families | %<br>Bank<br>Loans | Aggregate |
| La Salle<br>AA      | 3  | 78           | 100                | 32                   | 24.8     | 0.0                | 9.4                          | 24.0          | 66.7               | 15.6                    | 23.8          | 0.0                | 18.8                   | 27.4          | 33.3               | 46.9                              | 0.0           | 0.0                | 9.4       |

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data, 2017 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

2015-16

|                     | Total Home Mortgage<br>Loans |              |       |         | Low-Income Borrowers |                    |           | Moderate-Income<br>Borrowers |                    |           | Middle-Income Borrowers |                    |           | Upper-Income Borrowers |                    |           | Not Available-Income<br>Borrowers |                    |           |
|---------------------|------------------------------|--------------|-------|---------|----------------------|--------------------|-----------|------------------------------|--------------------|-----------|-------------------------|--------------------|-----------|------------------------|--------------------|-----------|-----------------------------------|--------------------|-----------|
| Assessment<br>Area: | #                            | \$<br>(000s) | Intal | Overall | %<br>Families        | %<br>Bank<br>Loans | Aggregate | %<br>Families                | %<br>Bank<br>Loans | Aggregate | %<br>Families           | %<br>Bank<br>Loans | Aggregate | %<br>Families          | %<br>Bank<br>Loans | Aggregate | %<br>Families                     | %<br>Bank<br>Loans | Aggregate |
| La Salle<br>AA      | 16                           | 2,085        | 100   | 50      | 37.6                 | 0.0                | 4.0       | 14.0                         | 25.0               | 22.0      | 18.4                    | 6.3                | 34.0      | 30.0                   | 68.8               | 30.0      | 0.0                               | 0.0                | 10.0      |

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower

2017

|                     | Total (             | Consume | r Loans            | Low-Income I    | Borrowers          | Moderate-l<br>Borrow |     | Middle-In<br>Borrow          |      | Upper-In<br>Borrow |                    | Not Available-Income<br>Borrowers |     |
|---------------------|---------------------|---------|--------------------|-----------------|--------------------|----------------------|-----|------------------------------|------|--------------------|--------------------|-----------------------------------|-----|
| Assessment<br>Area: | # \$ % of Total # H |         | % of<br>Households | % Bank<br>Loans | % of<br>Households |                      |     | % of Households % Bank Loans |      | % Bank<br>Loans    | % of<br>Households | % Bank<br>Loans                   |     |
| La Salle AA         | 8                   | 26      | 1.5                | 30.6            | 50.0               | 12.2                 | 0.0 | 27.4                         | 37.5 | 29.7               | 12.5               | 0.0                               | 0.0 |

Source: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data.

Due to rounding, totals may not equal 100.0

### Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower

2015-16

|                     | Total | Consume      | r Loans            | Low-Income I       | Borrowers | Moderate-l<br>Borrow |                                 | Middle-In<br>Borrow |                              | Upper-In<br>Borrow |                 | Not Available-Income<br>Borrowers |                 |
|---------------------|-------|--------------|--------------------|--------------------|-----------|----------------------|---------------------------------|---------------------|------------------------------|--------------------|-----------------|-----------------------------------|-----------------|
| Assessment<br>Area: | #     | \$<br>(000s) | % of<br>Total<br># | % of<br>Households |           |                      | % of % Bank<br>louseholds Loans |                     | % of Households % Bank Loans |                    | % Bank<br>Loans | % of<br>Households                | % Bank<br>Loans |
| La Salle AA         | 12    | 215          | 7.8                | 30.0               | 25.0      | 21.8                 | 8.3                             | 14.6                | 50.0                         | 33.5               | 16.7            | 0.0                               | 0.0             |

Source: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data.

Due to rounding, totals may not equal 100.0