

**INTERMEDIATE SMALL BANK** 

# PUBLIC DISCLOSURE

August 6th, 2019

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Louisiana Charter Number 12523

> 128 North Parkerson Ave Crowley, LA 70526

Office of the Comptroller of the Currency

3838 North Causeway Blvd., Suite 2890, Metairie, LA 70002-8105

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 (CD) Test is rated: Satisfactory.

The major factors that support this rating include:

- A more than reasonable loan-to-deposit (LTD) ratio given the bank's size, competition, and economic environment.
- A significant majority of loans being originated in the assessment area (AA).
- A geographic distribution of both home mortgage loans and small loans to businesses within lowand moderate-income census tracts (CTs) that exhibit an excellent dispersion throughout the bank's AAs.
- A reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- An excellent responsiveness to CD lending in the AAs.
- An adequate responsiveness to CD investment needs.
- Management did not receive any complaints in the AAs during the preview period.

## LTD Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is more than reasonable. The quarterly LTD ratio since the previous CRA evaluation averaged 89.59 percent, with a high of 94.36 percent in the third quarter of 2017 and a low of 84.65 percent in the second quarter of 2019. We compared the bank's LTD ratio to similarly-situated banks (peer group banks) within or near the AA during the same period of time. The peer group bank's average LTD ratio was 68.84 percent with a high average ratio of 85.15 percent and a low average ratio of 30.83 percent.

|                                    | Assets – As of    |                |
|------------------------------------|-------------------|----------------|
|                                    | December 31, 2018 | Average        |
| Institution                        | (in thousands)    | LTD            |
| First National Bank of Louisiana   | 400,708           | 89.59 <b>%</b> |
| Bank of Commerce & Trust Company   | 317,274           | 30.83%         |
| Rayne State Bank & Trust Company   | 373,384           | 85.15%         |
| First Federal Bank of Louisiana    | 888,698           | 82.92%         |
| Lakeside Bank                      | 195,596           | 73.85%         |
| Farmers State Bank & Trust Company | 110,090           | 71.45%         |

Source: Call Reports

## Lending in AA

A significant majority of the bank's loans were inside its AAs.

The bank originated and purchased 87.6 percent of its total loans by number and 77.5 percent of its total loans by dollar amount inside the bank's AAs during the evaluation period. This analysis is performed at the bank level, rather than at the AA level.

|                | Ν    | lumber | of Loans |      |       | Dollar A | 000s) |        |      |          |
|----------------|------|--------|----------|------|-------|----------|-------|--------|------|----------|
| Loan Category  | Insi | de     | Outs     | ide  | Total | Insid    | le    | Outsi  | de   | Total    |
|                | #    | %      | #        | %    | #     | \$       | %     | \$     | %    | \$(000s) |
| Home Mortgage  |      |        |          |      |       |          |       |        |      |          |
| Home Mortgage  | 342  | 85.7   | 57       | 14.3 | 399   | 56,407   | 73.8  | 20,031 | 26.2 | 76,438   |
| Small Business | 81   | 96.4   | 3        | 3.6  | 84    | 12,972   | 99    | 115    | 1    | 13,087   |
| Total          | 423  | 87.6   | 60       | 12.4 | 483   | 69,379   | 77.5  | 20,146 | 22.5 | 89,525   |

12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0

# **Description of Institution**

First National Bank of Louisiana (FNBL) is a \$400 million full-service nationally-chartered community bank headquartered in Crowley, Louisiana. Management currently operates with five branches in two AAs, with the main branch being located in Crowley, Louisiana, which is the parish seat of Acadia Parish. Acadia Parish is part of the Lafayette Metropolitan Statistical Area (MSA). In addition to another branch in Acadia Parish, the bank also operates a third branch in Lafayette and two branches in Calcasieu Parish, which is part of the Lake Charles MSA. The branches in the Lake Charles MSA are located in the cities of Lake Charles and Sulphur. FNBL did not open or close any braches during the review period.

The City of Crowley is 24 miles west of the City of Lafayette and 47 miles east of the City of Lake Charles, the two largest cities in the area. Crowley is primarily a rural and agricultural community and is the center of the state's rice industry. The bank's primary business focus is that of a commercial and real estate lender, with commercial real estate comprising the largest segment of the bank's loan portfolio. However, the bank offers a wide variety of loan products to serve the diverse needs of its communities, including Small Business Administration, conventional, and U.S. Government-sponsored (FHA, VA, and Rural Housing Development) mortgages originated and sold in the secondary market. There has been no change in focus regarding products since the previous CRA examination.

As illustrated in the table below, the bank's primary loan products include both small business and home mortgage lending.

| FNB Louisiana's Loan Portfolio |               |            |  |  |  |  |  |  |  |  |
|--------------------------------|---------------|------------|--|--|--|--|--|--|--|--|
| Loan Category                  | Dollars (000) | Percentage |  |  |  |  |  |  |  |  |
| Small Business                 | 100,682       | 44.4       |  |  |  |  |  |  |  |  |
| Mortgage Lending               | 63,104        | 27.8       |  |  |  |  |  |  |  |  |
| Construction                   | 28,763        | 12.7       |  |  |  |  |  |  |  |  |
| Multifamily                    | 17,633        | 7.8        |  |  |  |  |  |  |  |  |
| Consumer                       | 5,519         | 2.4        |  |  |  |  |  |  |  |  |
| Farm                           | 11,076        | 4.9        |  |  |  |  |  |  |  |  |
| Total                          | \$226,777     | 100        |  |  |  |  |  |  |  |  |

Source: Call Report as of 12/31/2018

Banking hours reasonably meet the community needs with lobby hours Monday through Friday and extended Friday hours, motor banking, and automated teller machines (ATMs) at all locations. The bank offers a wide range of deposit and loan products, and no significant differences exist between locations. There are no legal, financial, or other factors impeding the bank's ability to meet the credit needs in its AAs. The bank's CRA performance was previously evaluated on July 11, 2016 with an overall rating of "Satisfactory."

## Scope of the Evaluation

## **Evaluation Period/Products Evaluated**

The evaluation period for both the lending test and the CD test is January 1, 2016 through December 31, 2018. The bank is primarily a small business lender, but did make a considerable amount of residential mortgage loans during the review period. Consequently, we analyzed both loans to small businesses and home mortgage loans during this evaluation.

The loans to small business sample included a review of 81 loans originated during the review period while the home mortgage review included all Home Mortgage Disclosure Act (HMDA) loans originated during the review period. There were a total of 342 home mortgage loan originated in the AAs during

the review period. Additionally, we reviewed all CD activity including CD lending, investments and services.

Appendix D at the end of this evaluation contains the data used to conduct our analysis. We analyzed 2016 data separately from 2017 and 2018 data, as the 2017/18 data had been recently updated. Analysis of data related to calendar year 2016 is based on the 2006-2010 American Community Survey (ACS), while analysis of data related to calendar years 2017 and 2018 are based on the 2011 through 2015 ACS.

### Selection of Areas for Full-Scope Review

FNBL operates in two AAs, the Lafayette AA and Lake Charles AA. Both are within the State of Louisiana. Both AAs received a full-scope review. There are no limited-scope reviews in this evaluation.

## Ratings

FNBL's two AAs were rated equally during this evaluation. Additionally, both small business and home mortgage loans were also weighted equally.

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

Pursuant to 12 CFR 25.28(c), in determining a national bank's 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 does not have public information regarding noncompliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

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 Louisiana

## CRA rating for the State of Louisiana: Satisfactory The Lending Test is rated: Satisfactory The CD Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of both home mortgage loans and small loans to businesses within low- and moderate-income CTs exhibits an excellent dispersion throughout the bank's AAs.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- The bank exhibits excellent responsiveness to CD lending in the AAs.
- The level of CD investments revealed an adequate responsiveness to CD needs.
- Management did not receive any complaints in the AAs during the preview period.

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

#### Lafayette AA

FNBL operates with three branches in the Lafayette AA, two of which are located in Crowley, Louisiana, and one located in Lafayette, Louisiana. All branches are located in the Lafayette MSA, but the entire MSA is to too large to serve. Therefore, management focused its activities in Acadia Parish, which includes Crowley, and Lafayette Parish. The Lafayette AA is comprised of 55 CTs, including five low-income CTs, 11 moderate-income CTs, 21 middle-income CTs, 17 upper-income CTs, and one not applicable CT. A CT can become not applicable due to changes in the geography of the AA. The AA meets regulatory requirements and does not arbitrarily exclude any low- or moderate-income areas.

The Federal Financial Institutions Examination Council's (FFIEC) updated 2015 median family income for the AA was \$64,800. Low-income is defined as less than 50 percent of the median family income. Moderate-income is defined as 50 percent to less than 80 percent of the median family income. Middle-income is defined as 80 percent to 119 percent of the median family income. Upper-income is defined as income of 120 percent and over the median family income. The following table depicts income categories:

| Income Categories – Lafayette AA |                      |                      |           |  |  |  |  |  |
|----------------------------------|----------------------|----------------------|-----------|--|--|--|--|--|
| Low Moderate Middle Upper        |                      |                      |           |  |  |  |  |  |
| <\$32,400                        | \$32,400 to \$51,839 | \$51,840 to \$77,759 | ≥\$77,759 |  |  |  |  |  |

Source: US Census data

Low-income families earning a median family income less than \$32,399 represented 23.6 percent of families in the AA, while moderate-income families comprised 14.6 percent of the AA population. In

2015, 13 percent of households in the AA earned wages below the property level. In addition to these borrower lending constraints, opportunities for residential lending remain limited within the five low-income and 11 moderate-income CTs in the AA. Of the 31,199 housing units within those 16 CTs, approximately 48 percent of the units are occupied rental units with an average gross monthly rent of \$654 and another 11 percent are vacant.

Based on 2018 business demographic data, there were 32,369 non-farm businesses in the AA. Of these, 28,028 (86.59 percent) of the businesses had revenues of less than \$1 million, 1,595 (4.93 percent) had revenues greater than \$1 million, and 2,746 (8.48 percent) did not report revenue information. The economy of the Lafayette AA is mixed, with retail, education, medical services, manufacturing, mining, and tourism as major economic drivers. Agriculture (rice, soybeans, and crawfish), particularly in Acadia Parish, also comprise major segments of the AA's economy. Major employers in the AA include the Lafayette Parish School System (education), Lafayette General Health (medical services), Wood Group Production Services (oil and gas services), and Lafayette Consolidated Government (municipal government). According to the Bureau of Labor Statistics, the Lafayette MSA had a 4.8 percent unemployment rate in 2018, which was slightly lower than the Louisiana state average of 4.9 percent.

Competition among financial institutions in the AA remains significantly strong with the bank vying for loans among other large regional and local banks. According to the June 30, 2018 FDIC Deposit Market Share Report, FNBL ranked tenth out of 14 depository institutions, with approximately \$108 million in deposits within the AA and a market share of 1.56 percent. The top five institutions command 76.41 percent of the market share. Consequently, there is significant loan competition in the AA.

In conjunction with this evaluation, we conducted an interview with a community leader in the AA. The primary credit need in the community was identified as small business lending. According to this contact, local banks have been active in helping meet the credit needs of the AA.

|   | La      | fayette AA    |                    |                  |                 |               |
|---|---------|---------------|--------------------|------------------|-----------------|---------------|
| Demographic Characteristics                           | #       | Low<br>% of # | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (CTs)                                     | 55      | 9.1           | 20.0               | 38.2             | 30.9            | 1.8           |
| Population by Geography                               | 293,974 | 6.6           | 18.2               | 36.8             | 38.3            | 0.0           |
| Housing Units by Geography                            | 122,205 | 6.3           | 19.3               | 37.0             | 37.5            | 0.0           |
| Owner-Occupied Units by Geography                     | 73,235  | 3.9           | 14.8               | 39.6             | 41.6            | 0.0           |
| Occupied Rental Units by Geography                    | 38,359  | 10.5          | 26.2               | 32.5             | 30.9            | 0.0           |
| Vacant Units by Geography                             | 10,611  | 7.2           | 25.0               | 35.1             | 32.7            | 0.0           |
| Businesses by Geography                               | 32,369  | 8.2           | 15.5               | 37.1             | 39.0            | 0.2           |
| Farms by Geography                                    | 783     | 4.2           | 14.0               | 45.5             | 36.3            | 0.0           |
| Family Distribution by Income Level                   | 70,813  | 23.6          | 14.6               | 16.6             | 45.2            | 0.0           |
| Household Distribution by Income Level                | 111,594 | 26.1          | 14.3               | 14.9             | 44.7            | 0.0           |
| Median Family Income MSA - 29180<br>Lafayette, LA MSA |         | \$59,988      | Median Housi       | ng Value         |                 | \$153,907     |
|   |         |               | Median Gross       | Rent             |                 | \$756         |
|   |         |               | Families Belov     | w Poverty Lev    | vel             | 13.0%         |

Table A below illustrates select demographic data from the Lafayette AA:

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## Lake Charles AA

FNBL operates with two branches in the Lake Charles AA, located in the cities of Lake Charles and Sulphur, Louisiana. All branches are located in the Lake Charles MSA, but the entire MSA is too large to serve. Therefore, management focused its activities in Calcasieu Parish which includes both the cities of Lake Charles and Sulphur. The bank's AA includes 44 CTs with four low-income CTs, 12 moderateincome CTs, 14 middle-income CTs, 12 upper-income CTs, and two not applicable CTs. The bank did not select the entire MSA as its AA since the MSA is too large an area to be effectively served by the bank's two branches. The AA meets regulatory guidelines by including whole geographies and not arbitrarily excluding low- and moderate-income areas.

The FFIEC updated 2018 median family income for the AA was \$60,000. Low-income is defined as less than 50 percent of the median family income. Moderate-income is defined as 50 percent to less than 80 percent of the median family income. Middle-income is defined as 80 percent to 119 percent of the median family income. Upper-income is defined as income of 120 percent and over the median family income. The following table depicts income categories:

| Income Categories – Calcasieu Parish |                     |                    |           |  |  |  |  |  |
|--------------------------------------|---------------------|--------------------|-----------|--|--|--|--|--|
| Low Moderate Middle Upper            |                     |                    |           |  |  |  |  |  |
| <\$30,000                            | \$30,000 - \$47,999 | \$48,000- \$72,000 | >\$72,000 |  |  |  |  |  |

Source: US Census data

Low-income families earning a median family income less than \$30,000 represented 23.7 percent of families in the AA. Moderate-income families comprised 16.8 percent of the AA population. In 2015, 17.07 percent of households in the AA earned wages below the property level. In addition to these borrower lending constraints, opportunities for residential lending remain limited within the four low-income and 12 moderate-income CTs in the AA. Of the 26,811 housing units within those 16 CTs, approximately 46.9 percent of the units are occupied rental units with an average gross monthly rent of \$645 and another 15.54 percent are vacant.

Based on 2018 business demographic data, there were 18,242 non-farm businesses in the AA. Of these, 15,833 (86.79 percent) of the businesses had revenues of less than \$1 million, 673 (3.69 percent) had revenues greater than \$1 million, and 1,736 (9.52 percent) did not report revenue information. The economy of the Calcasieu Parish is mixed. Major employers in Calcasieu Parish include education (Calcasieu Parish School Board), healthcare (Lake Charles Memorial Health System), casino (Coushatta, Golden Nugget, LLC, and L'Auberge - Lake Charles Casinos Resort), chemical manufacturing (Westlake Chemical Corporation, LLC and Sasol Chemicals, LLC). According to the Bureau of Labor Statistics, the Calcasieu Parish MSA had a 4.7 percent unemployment rate in 2018, which was lower than the Louisiana state average and national average of 4.9 percent.

Competition among financial institutions in the AA remains significantly strong with the bank vying for loans amongst other large regional and local banks. According to the June 30, 2018 FDIC Deposit Market Share Report, FNBL ranked 11th out of 18 deposit institutions, with approximately \$74 million in deposits within the AA and a market share of 1.94 percent. The top five institutions command 72.5 percent of the market share, and consequently there is significant loan competition in the AA.

In conjunction with this examination, we conducted an interview with a community leader in the Calcasieu Parish AA. The type of organizations represented were community development based. Both organizations indicated that affordable housing, financial literacy and education were needed in the AA. According to this contact, local banks have been active in helping meet the credit needs of the AA.

| Lake Charles AA  |         |   |                |               |      |               |  |  |  |  |  |  |
|--|---------|---|----------------|---------------|------|---------------|--|--|--|--|--|--|
| Demographic Characteristics                              | #       | #     Low<br>% of #     Moderate<br>% of #     Middle<br>% of #     U |                |               |      | NA*<br>% of # |  |  |  |  |  |  |
| Geographies (CTs)  | 44      | 9.1   | 27.3           | 31.8          | 27.3 | 4.:           |  |  |  |  |  |  |
| Population by Geography                                  | 195,887 | 5.0   | 25.8           | 36.7          | 32.5 | 0.0           |  |  |  |  |  |  |
| Housing Units by Geography                               | 84,954  | 5.6   | 25.9           | 36.1          | 32.3 | 0.0           |  |  |  |  |  |  |
| Owner-Occupied Units by Geography                        | 51,678  | 2.9   | 18.7           | 41.5          | 36.9 | 0.0           |  |  |  |  |  |  |
| Occupied Rental Units by Geography                       | 23,647  | 10.7  | 38.3           | 24.9          | 26.2 | 0.0           |  |  |  |  |  |  |
| Vacant Units by Geography                                | 9,629   | 8.0   | 34.1           | 34.8          | 23.1 | 0.0           |  |  |  |  |  |  |
| Businesses by Geography                                  | 18,242  | 5.6   | 28.6           | 33.9          | 31.7 | 0.2           |  |  |  |  |  |  |
| Farms by Geography                                       | 365     | 3.0   | 15.3           | 41.4          | 40.3 | 0.0           |  |  |  |  |  |  |
| Family Distribution by Income Level                      | 50,663  | 23.7  | 16.8           | 17.9          | 41.6 | 0.0           |  |  |  |  |  |  |
| Household Distribution by Income Level                   | 75,325  | 25.6  | 15.6           | 16.4          | 42.5 | 0.0           |  |  |  |  |  |  |
| Median Family Income MSA - 29340<br>Lake Charles, LA MSA |         | \$57,618  | Median Housi   | ng Value      |      | \$126,978     |  |  |  |  |  |  |
|  |         |   | Median Gross   | Rent          |      | \$745         |  |  |  |  |  |  |
|  |         |   | Families Below | w Poverty Lev | /el  | 13.0%         |  |  |  |  |  |  |

Table A below illustrates select demographic data from the Lake Charles AA:

## Scope of Evaluation in Louisiana

FNBL operates in two AAs (Lafayette and Lake Charles) within the State of Louisiana. Both AAs received a full-scope review. There are no limited-scope areas.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISIANA

## LENDING TEST

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

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

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

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

## Home Mortgage Loans

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

## Lafayette AA

FNBL's geographic distribution of loans in the Lafayette AA is considered excellent. While the bank did not make any loans in the low-income CTs in 2016, the aggregate lending in the low-income CTs was only 0.6 percent and the percentage of owner-occupied housing units was only 1.6 percent, evidencing limited opportunities for lending in those tracks. The bank's lending in the moderate-income CTs in 2016 exceeded both the aggregate and comparator and is considered excellent.

The bank's geographic distribution of loans in 2017/18 is considered excellent as the bank exceeded both the percentage of owner-occupied housing units, as well as peer lending in both the low- and moderate-income CTs.

#### Lake Charles AA

FNBL's geographic distribution of loans in the Lakes Charles AA is considered excellent. The bank's lending activity either exceeded or was on par with the percentage of owner-occupied housing units and peer data for 2016 and 2017/18 in both the low- and moderate-income CTs.

#### Small Loans to Businesses

Refer to Table Q in the State of Louisiana section 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.

#### Lafayette AA

FNBL's geographic distribution of small loans to businesses in the Lafayette AA is considered excellent. The bank's lending activity exceeded the percentage of businesses in both the low- and moderate-income CTs for 2016 and 2017/18.

#### Lake Charles AA

FNBL's geographic distribution of small loans to business in the Lakes Charles AA is considered satisfactory. While the bank did not make any small loans to businesses in the low-income CTs in 2016, the bank's small loans to business in the moderate-income CTs exceeded the percentage of businesses in those tracts and is therefore considered excellent.

The bank's lending of small loans to businesses in 2017/18 is considered satisfactory as the percentage of land loans were only slightly less than the percentage of businesses in both the low- and moderate-income CTs.

## Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines and demographic information relating to the bank.

## Home Mortgage Loans

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

## Lafayette AA

FNBL's distribution of home mortgage loans to low-income borrowers is considered satisfactory. While the percentage of bank loans in 2016 was less than the percent of low-income families in the AA, the bank's percentage of loans was greater than peer lending and is therefore considered satisfactory. However, home mortgage lending to moderate-income borrowers was considered poor as the percent of bank loans was considerably less than both the percent of moderate-income families and peer lending.

The percent of moderate-income families as well as aggregate lending was 15.8 percent and 15.2 percent respectively, evidencing the availability of lending opportunities to moderate-income borrowers in the AA. Furthermore, demographic information reveals that approximately 40 percent of housing units are power-occupied, illustrating a need for home mortgage lending.

The bank's distribution to low-income borrowers in 2017/18 is considered satisfactory. While the percentage of bank loans was less than the percent of low-income families, the bank's percentage of loans was greater than peer lending and is therefore considered satisfactory. Home mortgage lending to moderate-income borrowers was considered satisfactory as the bank's lending was only slightly less than the percentage of families and peer lending.

## Lake Charles AA

FNBL's distribution of home mortgage loans to low-income borrowers is considered poor. While the percentage of bank loans in 2016 was less than the percent of low-income families, the bank's percentage of loans was greater than peer lending and is therefore considered satisfactory. Home mortgage lending to moderate-income borrowers was considered poor as the percent of bank loans was considerably less than both the percent of families and peer data.

The bank's distribution to low-income borrowers in 2017/18 is considered poor, as the bank did not make any loans to low-income borrowers in the AA. Aggregate lending, at 3.9 percent, evidences the availability of qualified borrowers in the AA. Home mortgage lending to moderate-income borrowers was also considered poor as the percent of bank loans was considerably less than both the percent of moderate-income families and peer data.

Aggregate lending data reveal that 9.9 percent and 10.8 percent of aggregate loans were made to moderate-income borrowers in 2016 and 2017/18, illustrating the ability of moderate-income borrowers to qualify for loans. Moreover, moderate-income families represent 16.8 percent of the population in the AA revealing a sizable pool of available borrowers. Lastly, 18.7 percent of the housing units in the AA are owner-occupied, illustrating a sizable mortgage lending market in the AA.

## Small Loans to Businesses

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

## Lafayette AA

The distribution of small loans to businesses in the Lafayette AA is considered excellent. For 2016, the small loans to businesses exceeded the percentage of businesses in the AA and is therefore the distribution is considered excellent. The distribution of small loans to businesses in 2017/18 is considered satisfactory as the bank's small loans to businesses was only slightly less than the percentages of businesses in the AA.

## Lake Charles AA

The distribution of small loans to businesses in the Lake Charles AA is considered satisfactory. For 2016 and 2017/18, the small loans to businesses was slightly less than the percentage of businesses in the AA and the distribution is considered satisfactory.

## **Responses to Complaints**

Management did not receive any complaints during the review period.

## **CD TEST**

The bank's performance under the CD Test in the state of Louisiana is rated Satisfactory.

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

## Number and Amount of CD Loans

Refer to the Lending Activity tables below for the facts and data used to evaluate the bank's level of CD lending.

FNBL's performance under the CD loans test in portions of the Lafayette and Calcasieu AAs is rated Outstanding. Based on a full-scope review, the bank exhibits excellent responsiveness to CD lending. CD loans in the broader statewide or regional area were not considered during this evaluation.

During the evaluation, FNBL originated 29 loans, totaling \$6.4 million or 13.3 percent of tier 1 capital in both AAs. Of the 29 loans, 79 percent were located in low- and moderate-income CTs.

## Lafayette AA

The level of CD lending in the Lafayette AA is considered excellent, which had a positive impact on the Lending Test performance in the Lafayette AA. During the evaluation, the bank originated 18 CD loans, totaling \$4.7 million. Of the 18 loans, 15 loans totaling \$3.7 million were for economic development, and three loans totaling \$1 million, were for affordable housing. Some notable examples of CD loans are as follows:

• The bank originated four lines of credit, totaling \$2 million to two companies that provide jobs to low- and moderate-income individuals. The lines of credit help meet the needs of the companies when working capital is needed.

• FNBL made a line of credit and two loans totaling \$808,000 to three companies for affordable housing. The line of credit was to renovate and repair low- and moderate-income rental properties. One loan was to finance the purchase of a seven-plex to provide housing to low- and moderate-income individuals. Another loan was to purchase rental houses, specifically for low- and moderate-income families.

## Lake Charles AA

The level of CD lending in the Lake Charles AA is considered adequate, which had a positive impact on the Lending Test performance in the AA. During the evaluation, the bank originated 11 CD loans, totaling \$1.7 million. Of these 11 loans, six loans totaling \$1.2 million were for CD services; four loans totaling \$460,000 were for affordable housing, and one loan totaling \$63,000 was for economic development. Some notable examples of CD loans are as follows:

- FNBL originated five lines of credit, totaling \$1.1 million to two companies for working capital to run a mental health facility through the Medicaid Program, and for working capital to offer behavioral services in low- and moderate-income areas of which 50 percent of the services are provided to Medicaid patients.
- FNBL made three loans, totaling \$307,000 to three companies for affordable housing in lowand moderate-income areas to low- and moderate-income families.

|              | Curre | ent Period |   |         | Total     |            |
|--------------|-------|------------|---|---------|-----------|------------|
| AA           | #     | \$(000's)  | # | % of    | \$(000's) | % of Total |
|              |       |            |   | Total # |           | \$         |
| Lafayette    | 1     | 481        | 1 | 100     | 481       | 100        |
| Lake Charles | 1     | 421        | 1 | 100     | 421       | 100        |

## Number and Amount of Qualified Investments

FNBL's qualified investments are considered satisfactory when considering the bank's performance context, capacity, and the needs of the AAs. The bank's investments demonstrate adequate responsiveness to CD needs in the AAs.

During the evaluation period, management made two qualifying CD investments totaling \$902,000, which represents 1.9 percent of tier 1 capital and eight Federal Home Loan Bank matching grants totaling approximately \$92,000. Additionally, \$102,719 in donations were provided to various charities and organizations who promote community and economic development. FNBL's combined investments, donations, and grants represented 2.3 percent of tier 1 capital. Some notable examples of CD investments are as follows:

## Lafayette AA

- Invested \$481,000 in a GNMA mortgage pool which provided affordable housing to low- and moderate-income borrowers in low- and moderate-income CTs.
- Provided grants in the amount of \$72,000, in conjunction with the FHLB matching grant program, to two non-profit organizations for after school tutoring to children living in public assistance housing; and another grant for revitalizing and stabilizing downtown Crowley in order to attract businesses and job opportunities.

• Contributed \$83,143 in donations to various charities and organizations who promote community and targeted economic development.

## Lake Charles AA

- Invested \$421,000 in a GNMA mortgage pool which provided affordable housing to low- and moderate-income borrowers in low- and moderate-income CTs.
- Provided a grant in the amount of \$20,000, in conjunction with the FHLB matching grant program to one non-profit organization to offset closing costs and fees for low- and moderate-income individuals when purchasing a new home.
- Contributed \$19,576 in donations to various charities and organizations who promote community and targeted economic development.

## Extent to Which the FNBL Provides CD Services

FNBL provided a poor level of CD services in both AAs during the review period.

The bank offers a full line of banking services, with most checking and savings account products offered at the bank having no monthly service charge. Additionally, the minimum opening deposit required for both checking and savings account is \$100, making these products readily accessible to low- and moderate-income individuals. In addition to low-cost checking and savings products, FNBL offers free online banking, telephone banking, and toll-free customer service. Products offered at the bank include personal loans, auto loans, home equity loans, home improvement loans, and mortgage loans.

In addition to the deposit and lending products and services, the bank offers various programs throughout the AA that benefit low- and moderate-income customers, the highlights of which include:

- A program wherein customers who have incurred NSF fees are offered a noninterest-bearing loan to help them pay off those fees without incurring additional costs. During the review period 27 customers were able to obtain approximately \$24,000 in interest free loans to help them strengthen their finances.
- An ACH program whereby internet banking customers can send money to anyone in the U.S. for \$0.95 per transaction, up to \$1,000 per day total for all recipients. This method of electronic funds transfer is significantly less than traditional, consumer wire transfer services, such as Western Union.
- Partnering with a provider of online financial literacy curriculum targeted to low- and moderateincome borrowers. The bank provided \$3,771 to cover the cost of software license, printed material, and technical and educational support for teachers and students in the AA.

## Lafayette AA

The bank operates with three branches in the AA, one each in a low-, moderate-, and upper-income CT. All branches provide services that are accessible to all geographies and individuals of different income levels. Branch hours are 8:30 a.m. to 4:00 p.m. Monday through Thursday with branches closing at 5:00 p.m. on Friday. No branches are open on the weekends. All branches have ATM access 24 hours a day, as well as drive-thru services. In addition to the ATMs located at the bank's branches, FNBL also grants access to nine additional ATMs throughout the AA at no cost to the customer. Business hours and services are convenient and accessible to all segments of the AA.

FNBL's management and employees participated in only a total of seven services designed to stabilize communities and improve the quality of life in the AA during the review period. These services focus on the needs of low- and moderate-income groups in the AA and enables the bank to better focus and participate in activities that satisfy CD needs in the AA.

### Lake Charles AA

FNB Louisiana operates with two branches in the AA, one in a low-income CT and the other in an upper-income CT. All branches provide services that are accessible to all geographies and individuals of different income levels. Branch hours are 9:00 a.m. to 5:00 p.m. Monday through Friday, with extended drive-thru hours in Lake Charles of 8:30 a.m. to 6:00 p.m. and 8:30 a.m. to 5:30 p.m. in Sulphur. No branches are open on the weekends. All branches additionally have ATM access 24 hours a day. Business hours and services are convenient and accessible to all segments of the AA.

FNBL's management and employees participated in only a total of six services designed to stabilize communities and improve the quality of life in the AA. These services focus on the needs of low- and moderate-income groups. Such activity enables the bank to become aware of and participate in activities that satisfy the CD needs of the AA.

## **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 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."

| Time Period Reviewed:          | 01/01/2016 - 12/31/2018  |                               |  |  |  |  |  |  |
|--------------------------------|--|-------------------------------|--|--|--|--|--|--|
| <b>Bank Products Reviewed:</b> | Home mortgage, small business, CD loans, CD investments, and CD services |                               |  |  |  |  |  |  |
|                                |  |                               |  |  |  |  |  |  |
| Affiliate(s)                   | Affiliate Relationship   | Products Reviewed             |  |  |  |  |  |  |
|                                |  |                               |  |  |  |  |  |  |
| Not Applicable                 |  |                               |  |  |  |  |  |  |
|                                |  |                               |  |  |  |  |  |  |
| List                           | of Assessment Areas and Typ  | e of Examination              |  |  |  |  |  |  |
| Rating and AAs                 | Type of Exam   | Other Information             |  |  |  |  |  |  |
| Louisiana                      |  |                               |  |  |  |  |  |  |
| Lafayette AA                   | Full-Scope   | Acadia and Lafayette Parishes |  |  |  |  |  |  |
| Lake Charles AA                | Full-Scope   | Calcasieu Parish              |  |  |  |  |  |  |

# **Appendix B: Summary of MMSA and State Ratings**

| RAT           | INGS First Na           | tional Bank of Louis      | siana        |  |  |  |  |  |
|---------------|-------------------------|---------------------------|--------------|--|--|--|--|--|
| Overall Bank: | Lending Test<br>Rating* |                           |              |  |  |  |  |  |
| FNBL          | Satisfactory            | Satisfactory Satisfactory |              |  |  |  |  |  |
| State:        |                         |                           |              |  |  |  |  |  |
| Louisiana     | Satisfactory            | Satisfactory              | Satisfactory |  |  |  |  |  |
|               |                         |                           |              |  |  |  |  |  |
|               |                         |                           |              |  |  |  |  |  |
|               |                         |                           |              |  |  |  |  |  |
|               |                         |                           |              |  |  |  |  |  |
|               |                         |                           |              |  |  |  |  |  |

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

## **Appendix C: Definitions and Common Abbreviations**

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:** 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.

**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 parishes, 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.

**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.

**CRA:** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including low- and moderate-income areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A CT 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 an 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/AA.

**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 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 income above.

**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/parishes that represent an employment center or centers, plus adjacent counties associated with the main/secondary county/parish or counties/parishes through commuting ties.

**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/parish or counties/parishes containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county/parish or counties/parishes 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 as CD.

**Rating Area:** A rated area is a state or multi-state MSA. 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 MSA, the institution will receive a rating for the multi-state MSA.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate MSAs, if applicable, are presented in one set of tables. References to FNBL include activities of any affiliates that FNBL provided for consideration. Refer to Appendix A. 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 multi-state MSA/AA. Deposit data are compiled by the FDIC and are available as of June 30 of each year. Tables without data are not included in this Performance Evaluation. For FNBL, these are Tables S, T, U, and V.

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

- Table O.AA Distribution of Home Mortgage Loans by Income Category of the Geography -<br/>Compares the percentage distribution of the number of loans originated and purchased by<br/>the bank in low-, moderate-, middle-, and upper-income geographies to the percentage<br/>distribution of owner-occupied housing units throughout those geographies. The table also<br/>presents aggregate peer data for the years the data is available.
- Table P.AA Distribution of Home Mortgage Loans by Income Category of the Borrower -<br/>Compares the percentage distribution of the number of loans originated and purchased by<br/>the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage<br/>distribution of families by income level in each multi-state MSA/AA. The table also<br/>presents aggregate peer data for the years the data is available.
- Table Q.AA Distribution of Loans to Small Businesses by Income Category of the Geography -<br/>The percentage distribution of the number of small loans (less than or equal to \$1 million)<br/>to businesses that were originated and purchased by the bank in low-, moderate-, middle-,<br/>and upper-income geographies compared to the percentage distribution of businesses<br/>(regardless of revenue size) in those geographies. Because aggregate small business data is<br/>not available for geographic areas smaller than counties/parishes, it may be necessary to<br/>compare bank loan data to aggregate data from geographic areas larger than the bank's AA.
- Table R.AA Distribution of Loans to Small Businesses by Gross Annual Revenue Compares<br/>the percentage distribution of the number of small loans (loans less than or equal to \$1<br/>million) originated and purchased by the bank to businesses with revenues of \$1 million or<br/>less to: 1) the percentage distribution of businesses with revenues of greater than \$1<br/>million; and, 2) the percentage distribution of businesses for which revenues are not<br/>available. The table also presents aggregate peer small business data for the years the data<br/>is available.
- Table S.AA Distribution of Loans to Farms by Income Category of the Geography The<br/>percentage distribution of the number of small loans (less than or equal to \$500,000) to<br/>farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income<br/>geographies compared to the percentage distribution of farms (regardless of revenue size)

throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties/parishes, it may be necessary to use geographic areas larger than the bank's AA.

- **Table T.AA Distribution of Loans to Farms by Gross Annual Revenues** Compares the<br/>percentage distribution of the number of small loans (loans less than or equal to \$500,000)<br/>originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the<br/>percentage distribution of farms with revenues of greater than \$1 million; and, 2) the<br/>percentage distribution of farms for which revenues are not available. The table also<br/>presents aggregate peer small farm data for the years the data is available.
- Table U.AA Distribution of Consumer Loans by Income Category of the Geography -<br/>Compares the percentage distribution of the number of loans originated and purchased by<br/>the bank in low-, moderate-, middle-, and upper-income geographies to the percentage<br/>distribution of households in those geographies.
- Table V.AA Distribution of Consumer Loans by Income Category of the Borrower Compares<br/>the percentage distribution of the number of loans originated and purchased by the bank to<br/>low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of<br/>households by income level in each multi-state MSA/AA.

|                       | Tota | al Home M | lortgage      | Loans             | Low-l  | Income '           | Tracts    | Moderate-Income Tracts                         |      |           | Middle   | -Income            | Tracts        | Upper-   | Income             | Tracts        | Not Available-Income Tracts                    |                    |           |
|-----------------------|------|-----------|---------------|-------------------|--|--------------------|-----------|--|------|-----------|--|--------------------|---------------|--|--------------------|---------------|--|--------------------|-----------|
| AA:                   | #    | \$        | % of<br>Total | Overall<br>Market | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units |      | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregat<br>e | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregat<br>e | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate |
| Lafayette<br>AA       | 79   | 9,998     | 54.5          | 9,168             | 1.6  | 0.0                | 0.6       | 21.3   | 38.0 | 13.4      | 36.9   | 25.3               | 32.5          | 40.2   | 36.7               | 53.5          | 0.0  | 0.0                | 0.0       |
| Lake<br>Charles<br>AA | 66   | 13,955    | 45.5          | 6,057             | 5.1  | 12.1               | 2.5       | 18.2   | 18.2 | 14.8      | 49.1   | 34.8               | 48.8          | 27.6   | 34.8               | 33.9          | 0.0  | 0.0                | 0.0       |
| Total                 | 145  | 23,953    | 100.0         | 15,225            | 3.1  | 5.5                | 1.4       | 20.0   | 29.0 | 13.9      | 42.1   | 29.7               | 39.0          | 34.9   | 35.9               | 45.7          | 0.0  | 0.0                | 0.0       |

| Total Home Mortgage Loa |     | e Loans | Low-Income Tracts |                   |  | Moderat            | te-Incon  | ne Tracts                                      | Middle             | -Income   | Tracts   | Upper-Income Tracts |           |  | Not Available-Income Tracts |           |  |                    |           |
|-------------------------|-----|---------|-------------------|-------------------|--|--------------------|-----------|--|--------------------|-----------|--|---------------------|-----------|--|-----------------------------|-----------|--|--------------------|-----------|
| AA:                     | #   | \$      | % of<br>Total     | Overall<br>Market | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans  | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans          | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate |
| Lafayette<br>AA         | 88  | 12,705  | 44.7              | 7,485             | 3.9  | 10.2               | 3.3       | 14.8   | 29.5               | 11.2      | 39.6   | 31.8                | 35.1      | 41.6   | 28.4                        | 50.4      | 0.0  | 0.0                | 0.0       |
| Lake<br>Charles<br>AA   | 109 | 19,749  | 55.3              | 5,328             | 2.9  | 4.6                | 1.9       | 18.7   | 33.9               | 15.8      | 41.5   | 24.8                | 41.2      | 36.9   | 36.7                        | 41.1      | 0.0  | 0.0                | 0.0       |
| Total                   | 197 | 32,454  | 100.0             | 12,813            | 3.5  | 7.1                | 2.7       | 16.4   | 32.0               | 13.1      | 40.4   | 27.9                | 37.6      | 39.7   | 33.0                        | 46.6      | 0.0  | 0.0                | 0.0       |

|                    | Tot | al Home I | Mortgag       | e Loans           | Low-In        | y-Income Borrowers |           | Moderate-Income<br>Borrowers |                    | Middle-I  | ncome I       | Borrowers          | Upper-I   | ncome B       | orrowers           | Not Available-Income<br>Borrowers |               |                    |           |
|--------------------|-----|-----------|---------------|-------------------|---------------|--------------------|-----------|------------------------------|--------------------|-----------|---------------|--------------------|-----------|---------------|--------------------|-----------------------------------|---------------|--------------------|-----------|
| AA:                | #   | \$        | % of<br>Total | Overall<br>Market | %<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 |
| Lafayette AA       | 79  | 9,998     | 54.5          | 9,168             | 22.9          | 7.6                | 5.5       | 15.8                         | 7.6                | 15.2      | 17.3          | 11.4               | 18.1      | 44.0          | 41.8               | 38.4                              | 0.0           | 31.6               | 22.8      |
| Lake Charles<br>AA | 66  | 13,955    | 45.5          | 6,057             | 23.4          | 9.1                | 2.9       | 17.9                         | 3.0                | 9.9       | 17.5          | 3.0                | 18.1      | 41.2          | 51.5               | 50.1                              | 0.0           | 33.3               | 19.0      |
| Total              | 145 | 23,953    | 100.0         | 15,225            | 23.1          | 8.3                | 4.5       | 16.7                         | 5.5                | 13.1      | 17.4          | 7.6                | 18.1      | 42.8          | 46.2               | 43.0                              | 0.0           | 32.4               | 21.3      |

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

|                       | Total Home Mortgage Loans |        |               | Loans             | Low-Income Borrowers |                    |           |               | erate-In<br>Borrowe |           | Middle-I      | ncome H            | Borrowers | Upper-Income Borrowers |                    |           | Not Available-Income<br>Borrowers |                    |           |
|-----------------------|---------------------------|--------|---------------|-------------------|----------------------|--------------------|-----------|---------------|---------------------|-----------|---------------|--------------------|-----------|------------------------|--------------------|-----------|-----------------------------------|--------------------|-----------|
| AA:                   | #                         | \$     | % of<br>Total | Overall<br>Market | %<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 |
| Lafayette<br>AA       | 88                        | 12,705 | 44.7          | 7,485             | 23.6                 | 5.7                | 5.4       | 14.6          | 9.1                 | 14.6      | 16.6          | 9.1                | 18.1      | 45.2                   | 43.2               | 37.7      | 0.0                               | 33.0               | 24.2      |
| Lake<br>Charles<br>AA | 109                       | 19,749 | 55.3          | 5,328             | 23.7                 | 0.0                | 3.9       | 16.8          | 6.4                 | 10.8      | 17.9          | 5.5                | 19.0      | 41.6                   | 47.7               | 45.2      | 0.0                               | 40.4               | 21.1      |
| Total                 | 197                       | 32,454 | 100.0         | 12,813            | 23.6                 | 2.5                | 4.8       | 15.5          | 7.6                 | 13.0      | 17.2          | 7.1                | 18.5      | 43.7                   | 45.7               | 40.8      | 0.0                               | 37.1               | 22.9      |

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

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|                 | Total Lo | ans to Small B | usinesses     | Low-Incor       | Low-Income Tracts |                 | Moderate-Income Tracts |                 | ome Tracts      | Upper-Inco      | me Tracts       | Not Available-Income<br>Tracts |                 |
|-----------------|----------|----------------|---------------|-----------------|-------------------|-----------------|------------------------|-----------------|-----------------|-----------------|-----------------|--------------------------------|-----------------|
| AA:             | #        | \$             | % of<br>Total | %<br>Businesses | % Bank<br>Loans   | %<br>Businesses | % Bank<br>Loans        | %<br>Businesses | % Bank<br>Loans | %<br>Businesses | % Bank<br>Loans | %<br>Businesses                | % Bank<br>Loans |
| Lafayette AA    | 20       | 1,406          | 31.8          | 1.6             | 10                | 18.8            | 35                     | 38.4            | 35              | 41.1            | 20              | 0.1                            | 0               |
| Lake Charles AA | 20       | 3,009          | 68.2          | 6.8             | 0                 | 27.7            | 35                     | 42.2            | 30              | 23.2            | 35              | 0.2                            | 0               |
| Total           | 40       | 4,415          | 100           | 3.5             | 5                 | 22.1            | 35                     | 39.8            | 32.5            | 34.5            | 27.5            | 0.2                            | 0               |

| Table Q: AA Distri | bution of I | Loans to Sn    | nall Busin    | esses by Inc    | come Cate       | gory of the (   | Geography              | <i>¥</i>        |                      |                 |                     |                 | 2017-1             |
|--------------------|-------------|----------------|---------------|-----------------|-----------------|-----------------|------------------------|-----------------|----------------------|-----------------|---------------------|-----------------|--------------------|
|                    | Total Loa   | ans to Small B | usinesses     | Low-Inco        | me Tracts       | Moderate-In     | Moderate-Income Tracts |                 | Middle-Income Tracts |                 | Upper-Income Tracts |                 | ble-Income<br>acts |
| AA:                | #           | \$             | % of<br>Total | %<br>Businesses | % Bank<br>Loans | %<br>Businesses | % Bank<br>Loans        | %<br>Businesses | % Bank<br>Loans      | %<br>Businesses | % Bank<br>Loans     | %<br>Businesses | % Bank<br>Loans    |
| Lafayette AA       | 21          | 5,145          | 60.1          | 8.2             | 19              | 15.5            | 38.1                   | 37.1            | 14.3                 | 39.0            | 28.6                | 0.2             | 0                  |
| Lake Charles AA    | 20          | 3,422          | 39.9          | 5.6             | 5               | 28.6            | 25                     | 33.9            | 25                   | 31.7            | 45                  | 0.2             | 0                  |
| Total              | 41          | 8,567          | 100           | 7.2             | 12              | 20.2            | 31.55                  | 36.0            | 19.65                | 36.4            | 30.15               | 0.2             | 0                  |

Due to rounding, totals may not equal 100.0

2016

 Table R: AA Distribution of Loans to Small Businesses by Gross Annual Revenues

|                 | 1  | Fotal Loans to | Small Business | es                | Businesses      | s with Revenues | s <= 1MM  | Businesses wit<br>1M |                 | Businesses with Revenues<br>Not Available |                 |
|-----------------|----|----------------|----------------|-------------------|-----------------|-----------------|-----------|----------------------|-----------------|---|-----------------|
| AA:             | #  | \$             | % of Total     | Overall<br>Market | %<br>Businesses | % Bank<br>Loans | Aggregate | %<br>Businesses      | % Bank<br>Loans | %<br>Businesses                           | % Bank<br>Loans |
| Lafayette AA    | 20 | 1,406          | 31.8           |                   | 87.5            | 95              |           | 4.6                  | 5               | 7.9                                       |                 |
| Lake Charles AA | 20 | 3,009          | 68.2           |                   | 88.1            | 60              |           | 3.3                  | 40              | 8.6                                       |                 |
| Total           | 40 | 4,415          | 100            | -                 | 87.7            | 77.5            |           | 4.2                  | 22.5            | 8.1                                       | -               |

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0

|                 |    | Total Loans to | Small Business | es                | Businesses      | with Revenue    | s <= 1MM  | Businesses wit<br>1M |                 | Businesses with Revenues<br>Not Available |                 |
|-----------------|----|----------------|----------------|-------------------|-----------------|-----------------|-----------|----------------------|-----------------|---|-----------------|
| AA:             | #  | \$             | % of Total     | Overall<br>Market | %<br>Businesses | % Bank<br>Loans | Aggregate | %<br>Businesses      | % Bank<br>Loans | %<br>Businesses                           | % Bank<br>Loans |
| Lafayette AA    | 21 | 5,145          | 60.1           |                   | 86.6            | 76.2            |           | 4.9                  | 23.8            | 8.5                                       |                 |
| Lake Charles AA | 20 | 3,422          | 39.9           |                   | 86.8            | 70              |           | 3.7                  | 30              | 9.5                                       |                 |
| Total           | 41 | 8,567          | 100            |                   | 86.7            | 73.1            |           | 4.5                  | 26.9            | 8.9                                       |                 |