



PUBLIC DISCLOSURE

October 29, 2013

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Moody
Charter Number 5774

101 7th Street at Avenue D
Moody, Texas 76557

Office of the Comptroller of the Currency
San Antonio – North Field Office
10001 Reunion Place, Suite 250
San Antonio, Texas 78216

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods consistent with the safe and sound operation of the institution. This evaluation is not, nor should it 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.

INSTITUTION'S CRA RATING: This institution is rated **"Satisfactory."**

First National Bank of Moody's (FNBM) lending performance is satisfactory given its size, financial condition, and known credit needs in its assessment area (AA).

- FNBM's loan-to-deposit (LTD) is reasonable given the bank's size, financial condition, and AA credit needs. The LTD ratio averaged 59% for this evaluation period.
- The majority of FNBM's loans were originated within its AA.
- FNBM's record of lending reflects satisfactory penetration to borrowers of different incomes and businesses of different sizes.
- There have been no complaints with respect to FNBM's Community Reinvestment Act (CRA) performance.

SCOPE OF EXAMINATION

We evaluated FNBM's CRA performance under the Small Bank examination procedures, which includes a lending test. The lending test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. The current review focused on the bank's primary loan products, commercial and real estate loans. We sampled 41 commercial loans that were originated between January 1, 2010 and June 30, 2013. In addition, our review utilized internally generated management reports and Home Mortgage Disclosure Act (HMDA) data of all residential real estate loans originated in 2010 through June 2013.

We performed a data integrity check of the HMDA – Loan Application Register (LAR) to ensure the accuracy of the 1-4 family lending sample. As of the 2010 Census, the US Census Bureau revised its approach to collecting most of the population and demographic data used in the CRA performance evaluation (PE) process. Data collection requirements and CRA PEs were impacted by 2010 Census data changes beginning January 1, 2012. The data changes required separate analysis for each year of CRA activity evaluated between 2011 through our examination date. Therefore, for this CRA examination, we analyzed and evaluated loan data against the applicable demographic for the years subject to our review. We tested three prior years and the first two quarters of the current year. For each loan product, these data changes required the use of two sets of tables for each metropolitan statistical area (MSA) - a table reflecting 2000 Census data demographics for the loans originated in 2010 and 2011 and a table reflecting 2010 Census data demographics for loans originated in 2012 and the first two quarters of 2013.

DESCRIPTION OF INSTITUTION

FNBM is headquartered in the city of Moody, Texas. Moody is located approximately 85 miles north of Austin and 25 miles southwest of Waco. The bank is a locally owned and managed financial institution with \$49 million in average assets as of June 30, 2013. FNBM is 100% owned by Reynolds, Teague, Thurman Financial Corporation located in Moody. This affiliate was not reviewed or considered in this evaluation.

The bank provides lobby and drive-through services Monday through Friday. Based on its financial condition, the local economy, product offerings, competition, and prior performance, FNBM has the ability to meet the various credit needs in its community. At our last CRA examination conducted in September 2007, FNBM's CRA rating was "Outstanding." No legal impediments or other factors hinder the bank's ability to provide credit in its AA.

FNBM's primary lending products include residential, real estate nonfarm nonresidential and commercial loans. Total loans as of September 30, 2013, amounted to \$23.2 million, which comprise 29.2% of total assets. Table 1 reflects a detailed breakdown of FNBM's loan portfolio as of September 30, 2013.

Table 1		
LOAN PORTFOLIO COMPOSITION		
<i>Loan Type</i>	<i>Dollar Amount (000's)</i>	<i>% of Total Loans</i>
Real Estate (RE) Residential (1-4)	8,193	35%
RE Nonfarm Nonresidential	5,620	24%
Commercial and Industrial	2,325	10%
Consumer	2,146	9%
Agricultural Production	1,790	8%
Other	1,573	7%
RE Construction	1,506	6%
RE Farmland	84	1%
Total	23,237	100%

DESCRIPTION OF ASSESSMENT AREA

FNBM's AA consists of over 100 census tracts (CTs), which are located primarily in southern McLennan County, eastern Coryell County, and northern Bell County. This area includes whole CTs of the Waco MSA and the Killeen-Temple MSA. The Waco MSA includes five low- and fourteen moderate-income (low and moderate combined to form LMI) CTs. The Killeen MSA includes one low- and twelve moderate-income CTs.

Although bank management defines its AA as encompassing the CTs within a thirty-mile radius of Moody, management recognizes both primary and secondary trade areas within this AA. The secondary trade area includes parts of Falls County, a rural farming community. Refer to the bank's public file for more information regarding these trade areas. The bank has only a .45% market share of deposits in the AA based on FDIC data. Competition from larger regional banks in the MSA limits their distribution, especially to the LMI CTs.

The local economy is considered stable. The city of Moody is a bedroom community with many of its residents commuting to Temple and Waco for employment. Specific demographic and economic data is listed on Table 2.

Table 2		
DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS - ASSESSMENT AREAS		
<i>Population</i>	<i>Killeen-Temple MSA</i>	<i>Waco MSA</i>
Number of Persons	351,420	227,964
Number of Families	80,694	53,919
Number of Households	111,425	80,628
<i>Geographies</i>		
Number of Census Tracts	76	49
% Low-Income Census Tracts	3.95 %	14.29 %
% Moderate-Income Census Tracts	25 %	20.41 %
% Middle-Income Census Tracts	47.37 %	28.57 %
% Upper-Income Census Tracts	18.42 %	32.65 %
<i>Median Family Income (MFI)</i>		
2010 MFI for AA	56,271	53,772
2012 HUD-Adjusted MFI	56,700	54,700
<i>Economic Indicators</i>		
Unemployment Rate	3.96 %	4.46%
2012 Median Housing Value	\$105,397	\$100,782
% of Owner-occupied Properties	49.10 %	53.08 %
% of Households Below Poverty Level	12.28 %	19.95 %

Source: 2010 US Census Data

FNBM's AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. Major employers in Moody and Bruceville-Eddy include the City of Moody, City of Bruceville-Eddy, and city independent school districts (ISD). In McGregor, major employers include Space X, and Ferguson. The Killeen MSA includes Scott and White in Temple, L3 and the Ft. Hood military installation. The Waco MSA includes employers of Providence Healthcare, Hillcrest Healthcare, Baylor University and Waco ISD.

In order to gather information that is more current on the nature of the community and potential lending opportunities in the AA, we contacted one community leader during this examination. The contact is the President of the Moody Chamber of Commerce. This contact mentioned that the bank is very involved in the community and responsive to credit needs. This contact further mentioned that FNBM has opportunities to participate in community development.

CONCLUSIONS ABOUT PERFORMANCE CRITERIA

Based on our analysis and AA demographics, FNBM is performing in a satisfactory manner in meeting the credit needs within its AA, including LMI individuals, consistent with its resources and capabilities.

Loan-to-Deposit Ratio

FNBM's LTD ratio is satisfactory given its asset size, financial condition, and lending opportunities within its AA. Since the last CRA examination, the average LTD ratio has decreased from 65% on June 30, 2007, to 59% on June 30, 2013. FNBM's LTD ratio is comparable to other similarly situated banks and is reasonable when considering the nature of its community, customer base, and known credit needs in the AA. The average LTD ratio for similarly situated banks ranged from 36% to 97%. The asset size and average LTD ratios for FNBM and its competing banks are listed below in Table 3.

<i>Institution</i>	<i>Assets as of 06/30/2013</i>	<i>Average LTD Ratio %</i>
First National Bank of McGregor	\$129,688	96.91
First National Bank of Evant	66,848	68.08
Oglesby State Bank	14,004	93.92
Pointwest Bank	95,971	36.14
First Texas Bank-Killeen	248,614	38.05
First National Bank of Moody	\$49,126	58.88

* Asset sizes of institutions are in thousands (000's)

Lending in Assessment Area

A substantial majority of the bank's loans were made within its AA. In order to assess performance for this criterion, we reviewed a sample of 41 commercial loans originated during 2010 through June 30, 2013. Our analysis determined that 94% of the number and 95% of the dollar amount of all loans sampled were made within the AA.

Based on our analysis, FNBM meets the standards for outstanding performance regarding this criterion. Table 4 below details FNBM's record of lending in the AA.

Loan Type	Number of Loans					Dollars of Loans (000's)				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Residential RE (2010 & 2011)	35	92.11	3	7.89	38	\$2,067	90.18	\$225	9.82	\$2,292
Residential RE (2012 & 2013)	35	94.59	2	5.41	37	\$2,770	97.67	\$66	2.33	\$2,836
Commercial (2010 & 2011) (limited sample)	4	80	1	20	5	\$112	71	\$45	29	\$157
Commercial (2012 & 2013) (limited sample)	36	100	0	0	36	1,702	100	0	0	1,702
Totals	110	94	6	6	116	6,651	95	336	5	6,987

Source: Data reported under HMDA; Commercial Loan Sample

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

FNBM has a reasonable penetration in lending to borrowers of different incomes and businesses of different sizes, meeting the standards for satisfactory performance.

FNBM's record of commercial lending to small businesses within the AA reflects satisfactory penetration. In the Killeen MSA loan sample, FNBM originated 65% of loans to businesses with annual revenues of \$1 million or less and 57% by dollar volume. This performance is considered reasonable and consistent with area demographics that indicated that 71% of businesses within the MSA reported revenues of \$1 million or less. In the Waco MSA loan sample, FNBM originated 100% of the loans to businesses with annual revenues of \$1 million or less. This performance is considered outstanding. Waco area demographics indicated that 70% of businesses within the MSA reported revenues of \$1 million or less. Refer to Table 5 for additional details regarding the Killeen AA and Table 6 for additional details regarding the Waco AA.

TABLE 5				
BORROWER DISTRIBUTION OF LOANS TO BUSINESSES IN KILLEEN MSA ASSESSMENT AREA				
<i>Business Revenues (or Sales)</i>	<i><\$1,000,000</i>	<i>>\$1,000,000</i>	<i>Unavailable/ Unknown</i>	<i>Total</i>
% of AA Businesses	71.78%	2.19%	26.02%	100%
% of Bank Loans in AA by # (limited sample)	65.00%	35.00%	0.00%	100%
% of Bank Loans in AA by \$ (limited sample)	57.21%	42.79%	0.00%	100%

Source: Commercial Loan Sample; Dunn & Bradstreet data

TABLE 6				
BORROWER DISTRIBUTION OF LOANS TO BUSINESSES IN WACO MSA ASSESSMENT AREA				
<i>Business Revenues (or Sales)</i>	<i><\$1,000,000</i>	<i>>\$1,000,000</i>	<i>Unavailable/ Unknown</i>	<i>Total</i>
% of AA Businesses	70.27%	3.59%	26.13%	100%
% of Bank Loans in AA by # (limited sample)	100.00%	0.00%	0.00%	100%
% of Bank Loans in AA by \$ (limited sample)	100.00%	0.00%	0.00%	100%

Source: Commercial Loan Sample; Dunn & Bradstreet data

Residential Real Estate Loans

FNBM’s record of 1-4 family residential real estate lending to consumers of different income levels within the AA is excellent. Within the Killeen MSA, 65% of residential loans were made for home purchases, 10% for home improvement and 25% for home refinance purposes.

According to 2000 Census demographic information, 17% of families within this MSA are low-income and 20.02% are moderate-income. FNBM originated 25% of its home refinance loans to low-income borrowers and 50% of its home purchase loans to moderate-income borrowers. See Table 7A for further details.

Table 7A								
BORROWER DISTRIBUTION OF RESIDENTIAL REAL ESTATE LOANS IN KILLEEN MSA ASSESSMENT AREA								
<i>Borrower Income Level</i>	<i>Low</i>		<i>Moderate</i>		<i>Middle</i>		<i>Upper</i>	
Loan Type	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans
Home Purchase	17.05	0.00	20.02	50.00	23.75	33.33	39.18	16.67
Home Improvement	17.05	0.00	20.02	0.00	23.75	0.00	39.18	0.00
Home Refinance	17.05	25.00	20.02	25.00	23.75	50.00	39.18	0.00

Source: Data reported under HMDA; 2000 U.S. Census data; Loans originated in 2010 and 2011

According to 2010 Census demographic information, 19.53% of families within this MSA are low-income and 19.24% are moderate-income. FNBM originated 15.38% of its home purchase loans and 20% of its home refinance loans to low-income borrowers. They originated 23% of its home purchase loans to moderate-income borrowers. See Table 7B for further details.

Table 7B								
BORROWER DISTRIBUTION OF RESIDENTIAL REAL ESTATE LOANS IN KILLEEN MSA ASSESSMENT AREA								
<i>Borrower Income Level</i>	<i>Low</i>		<i>Moderate</i>		<i>Middle</i>		<i>Upper</i>	
Loan Type	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans
Home Purchase	19.53	15.38	19.24	23.08	21.46	15.38	39.77	46.15
Home Improvement	19.53	0.00	19.24	0.00	21.46	0.00	39.77	100.00
Home Refinance	19.53	20.00	19.24	0.00	21.46	60.00	39.77	20.00

Source: Data reported under HMDA; 2010 U.S. Census data; Loans originated in 2012 – June 30, 2013

According to 2000 Census demographic information, 20.64% of families within the Waco MSA are low-income and 17.56% are moderate-income. Within the Waco MSA, 66% of residential loans were made for home purchases, 3% for home improvement and 31% for home refinance purposes.

FNBM originated 20% of its home purchase loans and 14.29% of its home refinance loans to low-income borrowers. The bank originated 13.33% of its home purchase loans and 50% of home improvement loans to moderate-income borrowers. See Table 8A for further details.

Table 8A								
BORROWER DISTRIBUTION OF RESIDENTIAL REAL ESTATE LOANS IN WACO MSA ASSESSMENT AREA								
<i>Borrower Income Level</i>	<i>Low</i>		<i>Moderate</i>		<i>Middle</i>		<i>Upper</i>	
Loan Type	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans
Home Purchase	20.64	20.00	17.56	13.33	21.23	20.00	40.57	46.67
Home Improvement	20.64	0.00	17.56	50.00	21.23	0.00	40.57	50.00
Home Refinance	20.64	14.29	17.56	0.00	21.23	42.86	40.57	42.86

Source: Data reported under HMDA; 2000 U.S. Census data; Loans originated 2010 – 2011

According to 2010 Census demographic information, 22.46% of families within this MSA are low-income and 17.37% are moderate-income. FNBM originated 18.18% of its home purchase loans and 50.00% of its home improvement loans to low-income borrowers. The bank originated 9.09% of its home purchase loans and 33.33% of home refinance loans to moderate-income borrowers. See Table 8B for further details.

Table 8B								
BORROWER DISTRIBUTION OF RESIDENTIAL REAL ESTATE LOANS IN WACO MSA ASSESSMENT AREA								
<i>Borrower Income Level</i>	<i>Low</i>		<i>Moderate</i>		<i>Middle</i>		<i>Upper</i>	
Loan Type	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans
Home Purchase	22.46	18.18	17.37	9.09	19.64	27.27	40.54	45.45
Home Improvement	22.46	50.00	17.37	0.00	19.64	0.00	40.54	50.00
Home Refinance	22.46	0.00	17.37	33.33	19.64	66.67	40.54	0.00

Source: Data reported under HMDA; 2010 U.S. Census data

Geographic Distribution of Loans

FNBM’s lending to families in LMI CTs in the Killeen MSA does not meet the AA demographic standards. FNBM’s residential real estate lending to families in LMI CTs in the Killeen MSA shows poor dispersion. According to 2000 Census information, .2% of AA households are located in low-income CTs and 9% of AA households are located in moderate-income CTs. According to 2010 Census information, 1% of AA households are located in low-income CTs and 9% of AA households are in moderate-income CTs. However, based on our sample test for both periods (2010-2011; 2012-2013), the bank did not make any residential real estate loans to individuals located in low-income or in moderate-income CTs. This can be attributed to the single branch location in Moody relative to the LMI CTs in in the Killeen MSA. A majority of the LMI CTs are also east of the I-35 corridor in the Killeen MSA. The particular location of the bank, as well as the competitive banking environment in Temple, make it unlikely that the bank can reasonably and competitively serve the entire MSA. The LMI CTs are located on the south east side of Temple where there are at least six other banks located in or around the LMI CTs. FNBM’s location and the presence of competitor banks in LMI CTs limit the demand of loans from FNBM in LMI CTs.

Tables 9A and 9B reflect the results of our geographic distribution test of residential real estate loans in the Killeen MSA AA.

Table 9A								
GEOGRAPHIC DISTRIBUTION OF RESIDENTIAL REAL ESTATE LOANS IN KILLEEN MSA ASSESSMENT AREA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	0.20	0.00	9.04	0.00	54.60	0.00	36.15	100.00
Home Improvement	0.20	0.00	9.04	0.00	54.60	0.00	36.15	0.00
Home Refinance	0.20	0.00	9.04	0.00	54.60	25.00	36.15	75.00

Source: Data reported under HMDA; 2000 U.S. Census data; Loans originated in 2010 – 2011

Table 9B								
GEOGRAPHIC DISTRIBUTION OF RESIDENTIAL REAL ESTATE LOANS IN KILLEEN MSA ASSESSMENT AREA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	1.42	0.00	9.70	0.00	60.22	76.92	28.66	23.08
Home Improvement	1.42	0.00	9.70	0.00	60.22	100.00	28.66	0.00
Home Refinance	1.42	0.00	9.70	0.00	60.22	40.00	28.66	60.00

Source: Data reported under HMDA; 2010 U.S. Census data; Loans originated in 2012 – June 30, 2013

FNBM lending to families in LMI CTs in the Waco MSA overall meets the AA demographic standards. FNBM’s residential real estate lending to families in LMI CTs in the Waco MSA shows reasonable dispersion. According to 2000 Census information, 5% of AA households are located in low-income CTs and 19% are in moderate-income CTs. Within the Waco MSA, 66% of residential loans were made for home purchases, 3% for home improvement and 31% for home refinance purposes.

According to 2010 Census information, 5% of AA households are located in low-income CTs and 15% are in moderate-income CTs. Based on our sample test for 2010 - 2011, FNBM originated 14.28% of its home refinance loans to low-income borrowers, and 13% of its home purchase loans to moderate-income borrowers. Based on our sample test for 2012 - 2013, the bank did not make any residential real estate loans to individuals located in low- or moderate-income CTs. This continues to be attributed to the single-branch location in Moody relative to the LMI CTs in in the Waco MSA. A majority of the LMI tracts are also east of the I-35 corridor in the Waco MSA. The particular location of the bank, as well as the competitive banking environment in Waco, make it unlikely that the bank can reasonably and competitively serve the entire MSA.

The LMI CTs near downtown Waco are where there are at least six other banks located in or around those CTs. FNBM’s location and the presence of competitor banks in LMI CTs limit FNBM from making additional loans in LMI CTs. Tables 10A and 10B reflect the results of our geographic distribution test of residential real estate loans in the Waco MSA AA.

Table 10A								
GEOGRAPHIC DISTRIBUTION OF RESIDENTIAL REAL ESTATE LOANS IN WACO MSA ASSESSMENT AREA								
<i>Census Tract Income Level</i>	<i>Low</i>		<i>Moderate</i>		<i>Middle</i>		<i>Upper</i>	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	5.00	0.00	19.45	13.33	33.91	53.33	41.63	33.33
Home Improvement	5.00	0.00	19.45	0.00	33.91	100.00	41.63	0.00
Home Refinance	5.00	14.28	19.45	0.00	33.91	57.14	41.63	28.57

Source: Data reported under HMDA; 2000 U.S. Census data

Table 10B								
GEOGRAPHIC DISTRIBUTION OF RESIDENTIAL REAL ESTATE LOANS IN WACO MSA ASSESSMENT AREA								
<i>Census Tract Income Level</i>	<i>Low</i>		<i>Moderate</i>		<i>Middle</i>		<i>Upper</i>	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	5.68	0.00	15.49	0.00	27.61	54.55	51.20	45.45
Home Improvement	5.68	0.00	15.49	0.00	27.61	50.00	51.20	50.00
Home Refinance	5.68	0.00	15.49	0.00	27.61	100.00	51.20	0.00

Source: Data reported under HMDA; 2010 U.S. Census data

FNBM’s lending to businesses in LMI CTs in the Waco and Killeen MSA does not meet the AA demographic standards.

FNBM’s lending to businesses in LMI CTs in the Killeen MSA shows poor dispersion. According to 2010 Dunn and Bradstreet data, 1.6% of businesses in the AA are located in low-income CTs and 20% are in moderate-income CTs. However, based on our loan sample, the bank did not make any commercial loans to businesses in low- or moderate-income CTs. FNBM’s location and the presence of competitor banks in LMI CTs limit the demand on FNBM for loans in LMI CTs. Table 11 reflects the results of our geographic distribution test of lending to businesses in the Killeen MSA AA.

Table 11								
GEOGRAPHIC DISTRIBUTION OF LOANS TO BUSINESSES IN KILLEEN MSA ASSESSMENT AREA								
<i>Census Tract Income Level</i>	<i>Low</i>		<i>Moderate</i>		<i>Middle</i>		<i>Upper</i>	
Loan Type	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans
Businesses	1.68	0	19.66	0	51.20	65.0	26.29	35.0

Source: Loan sample; Dunn & Bradstreet data

FNBM’s lending to businesses in LMI CTs in the Killeen MSA shows poor dispersion. According to 2000 Census information, .2% of AA households are located in low- and 9% in moderate-income CTs. According to 2010 Census information, 1% of AA households are located in low- and 9% in moderate-income CTs. However, based on our sample test for both time periods (2010 - 2011 and 2012 - 2013), the bank did not make any commercial loans to individuals located in low- or moderate-income CTs. This continues to be attributed to the single-branch location in Moody relative to the LMI CTs in the Killeen MSA. Table 12 reflects the results of our geographic distribution test of loans to businesses in the Waco MSA AA.

Table 12								
GEOGRAPHIC DISTRIBUTION OF LOANS TO BUSINESSES IN WACO MSA ASSESSMENT AREA								
<i>Census Tract Income Level</i>	<i>Low</i>		<i>Moderate</i>		<i>Middle</i>		<i>Upper</i>	
Loan Type	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans
Businesses	5.76	0	20.22	0	28.11	55.57	45.36	44.43

Source: Loan sample; Dunn & Bradstreet data

Responses to Complaints

Neither FNBM nor the Office of the Comptroller of the Currency’s Customer Assistance Group has received a complaint on the bank’s CRA performance.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.