



## PUBLIC DISCLOSURE

July 20, 2015

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

West Texas National Bank  
Charter Number 24185

#6 Desta Drive, Suite 2400  
Midland, TX 79705

Office of the Comptroller of the Currency  
Lubbock Field Office  
5225 South Loop 289, Suite 108  
Lubbock, TX 79424

**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, 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.**

**The Lending Test is rated Satisfactory.**

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

West Texas National Bank (WTNB) has a satisfactory record of meeting community credit needs based on the following:

- WTNB's loan-to-deposit ratio is reasonable with a quarterly average net loan-to-deposit ratio of 54 percent.
- A majority of WTNB's loans are within the bank's assessment areas (AAs). About 76 percent of the number and 56 percent of the dollar volume of loans were made within the AAs.
- Lending to businesses of different sizes is reasonable and consumer loans reflect reasonable distribution to individuals of different income levels.
- The geographic distribution of loans to small businesses and consumers reflects a reasonable dispersion throughout the AAs.
- WTNB's community development activities demonstrate adequate responsiveness to the needs of its AAs through community development loans, qualified investments, and community development services.

## **Scope of Examination**

We evaluated WTNB using the Intermediate Small Bank evaluation procedures, which include Lending and Community Development Tests. The Lending Test evaluates the bank's record of meeting the credit needs of its AAs through lending activities. The Community Development Test evaluates the bank's responsiveness to identified needs in its AAs through lending, qualified investments, and services.

WTNB has three AAs that include the Midland MSA AA, Gaines & Yoakum Counties AA, and the Trans-Pecos Region AA. The Trans-Pecos Region AA is comprised of four similar but noncontiguous non-MSA counties. Based on the distribution of WTNB's loans and deposits, all AAs received full-scope reviews.

The bank's predominant primary loan product for the Midland MSA and Trans-Pecos AAs is commercial loans. Agricultural loans are the primary loan product in the Gaines & Yoakum Counties AA. In all three AAs, we also considered consumer loans (by number) a primary product. Performance in the Midland MSA AA is weighted most heavily since it contains the majority of the bank's loans and deposits. Conclusions regarding the Lending Test are based on the origination of commercial, agricultural, and consumer loans originated in 2012 and 2013, which are evaluated against 2010 U.S. Census data. We sampled 184 loans to analyze CRA lending performance, approximately 30 loans in each primary product for each AA.

The evaluation period for the Community Development Test uses information from the end of the previous CRA evaluation period, May 23, 2011, through June 20, 2015.

## Description of Institution

WTNB is an intrastate institution headquartered in Midland, TX in the Permian Basin area of the state. WTNB has eleven branches in eight cities throughout West Texas. The bank is a wholly owned subsidiary of First West Texas Bancshares, Inc., which reported total assets of \$1.06 billion as of March 31, 2015.

The bank offers a comprehensive range of commercial and consumer banking products and related financial products. All branches offer full-service banking. Lobby and drive-up hours Monday through Friday are set by each location to meet customer needs, with Saturday drive-up services at two locations. WTNB has ATMs at all branches plus three additional locations to increase accessibility. The bank provides 24-hour access to banking services through its website at [www.wtnb.com](http://www.wtnb.com). Services include account balance inquiries, funds transfer activities, bill pay services, new account applications, and mobile banking. WTNB also offers telebanking and mobile banking, which also provides 24-hour access to banking services.

As of March 31, 2015, WTNB had total assets of \$1.06 billion, with net loans and leases comprising 52 percent of this total. The bank specializes in oil and gas lending, which is a subset of commercial lending. The following table depicts WTNB's loan portfolio composition as of March 31, 2015:

Loan Portfolio Composition		
Loan Category	\$000s	%
Commercial	271,783	48%
Commercial Real Estate	144,737	26%
Agricultural	16,664	3%
Agricultural Real Estate	33,755	6%
Secured by 1-4 Family Residential Real Estate	65,856	12%
Consumer	29,660	5%
<b>Total Loans</b>	<b>562,455</b>	<b>100%</b>

*Source: March 31, 2015 Report of Condition*

Management and the Board's primary business focus is serving commercial, agricultural, and consumer customers in West Texas, while providing a return to shareholders. WTNB was rated "Satisfactory" at the previous CRA examination dated May 23, 2011. WTNB has no legal or financial circumstances that impede its ability to help meet the credit needs in its AAs. The bank is financially capable of meeting almost any request for credit, subject to certain legal restrictions applicable to all national banks.

As part of this CRA examination, we met with a community contact in Midland, TX to help ascertain the economic development needs of the AA. The community contact noted that there are several opportunities to participate in community service activities, including lending to start-up businesses and Small Business Administration (SBA) loans. The contact also indicated that local banks are responsive to meeting the credit needs of the community. Community development opportunities are ample in the Midland MSA AA, but limited in the other two AAs.

## Description of Assessment Areas

The Midland MSA AA is the bank's primary AA when considering the bank's overall operations, branch network, lending and deposit levels, and deposit market share. Demographic and economic information for each of the three assessment areas is in the following table:

<b>Demographic and Economic Characteristics</b>			
<b>Assessment Area</b>	<b>Midland MSA AA</b>	<b>Gaines &amp; Yoakum Counties AA</b>	<b>Trans-Pecos Region AA</b>
<b>Population</b>			
Number of Families	35,366	6,110	7,669
Number of Households	49,122	7,944	11,726
<b>Geographies</b>			
Number of Census Tracts (CTs)	27	5	12
% Low-Income CTs	7	0	8
% Moderate-Income CTs	19	0	25
% Middle-Income CTs	44	100	42
% Upper-Income CTs	26	0	25
% N/A CTs	4	0	0
<b>Median Family Income (MFI)</b>			
2010 MFI for AA	\$71,186	\$52,445	\$49,848
2013 HUD-Adjusted MFI	\$65,100	\$50,500	\$50,500
<b>Economic Indicators</b>			
Unemployment Rate	2.61%	3.48%	4.41%
2010 Median Housing Value	\$132,404	\$72,820	\$60,425
% of Households Below Poverty Level	12.14	18.40	21.90

*Source: 2010 Census data and updated HUD income data*

### Midland MSA AA

The Midland MSA AA is the bank's primary AA. The AA is comprised of Midland County located in the Permian Basin area of West Texas. The city of Midland is the largest city in the AA. The main office, three additional branches, and one additional ATM are located in the Midland AA.

The AA consists of whole geographies and does not arbitrarily exclude any low- or moderate-income census tracts (CTs). The AA includes 27 CTs with a total population of 136,872. The census tracts consist of 2 low-, 5 moderate-, 12 middle-, 7 upper-income, and 1 NA CT. Approximately 12 percent of the AA households are below the poverty level. Twenty-two percent of families in the AA are low-income, 17 percent are moderate-income, 20 percent are middle-income, and 41 percent are upper-income.

Economic conditions were strong during the evaluation period, centered in energy production. As of 2014, Midland, TX had the lowest unemployment rate in the United States at 2.3 percent. According to the city's 2014 Comprehensive Annual Financial Report, the top employers in the city are Midland ISD, Dawson Geophysical, Midland Memorial Hospital & Medical Center, Walmart, the City of Midland, and Midland College. In addition, many residents are employed either directly or indirectly in oil and gas production.

Banking competition is strong in the AA and includes national, regional, and community banks. As of June 30, 2014, WTNB's deposit market share in the AA was 7 percent, ranking sixth among 17 financial institutions. Wells Fargo Bank N.A., Community National Bank, Bank of America N.A., and Frost Bank dominate market share, with each exceeding 12 percent. About 72 percent of WTNB's loans and 51 percent of its deposits are attributable to this AA.

Trans-Pecos Region AA

The AA consists of Winkler, Crane, Reeves, and Brewster Counties located in the Southwestern part of Texas. The bank has five branches throughout the AA in the cities of Pecos, Kermit, Crane, Alpine, and Terlingua.

The AA consists of whole geographies and does not arbitrarily exclude any low- or moderate-income CTs. The AA includes 12 CTs with a total population of 34,500. Geographies consist of 1 low-, 3 moderate-, 5 middle-, and 3 upper-income CTs. About 22 percent of AA households are below the poverty level. Twenty-six percent of families in the AA are low-income, 13 percent are moderate-income, 20 percent are middle-income, and 41 percent are upper-income.

Economic conditions are strong. The AA economy is centered in energy and agricultural production. In Crane and Winkler counties, the largest segment of the local economy is oil and gas production followed by cattle ranching and local government. In Reeves County, agriculture, food processing, and gravel mining support the economy. Major employers are the TransPecos Foods processing plant, the GEO group (which manages private correctional centers), local school districts, and city and county government offices. The Brewster County economy is primarily based on tourism and is the home of Big Bend National Park. Alpine is the county seat and contains Sul Ross State University, one of the largest employers in the AA.

Banking competition is moderate in the AA. As of June 30, 2014, WTNB dominated deposit market share in the AA at 53 percent, ranking first among six financial institutions. About 14 percent of WTNB's loans and 33 percent of its deposits are attributable to this AA.

Gaines & Yoakum Counties AA

The AA is comprised of Gaines and Yoakum Counties. Principal cities include Seminole and Denver City, which are also the respective county seats. The bank has one branch each in Seminole and Denver City.

The AA consists of whole geographies and does not arbitrarily exclude any low- or moderate-income CTs. The AA includes 5 CTs (all middle-income) with a total population of 25,405. About 18 percent of AA households are below the poverty level. Twenty-two percent of families in the AA are low-income, 11 percent are moderate-income, 22 percent are middle-income and 45 percent are upper-income.

Economic conditions are good. Agriculture, oil, and gas are the primary industries for the AA. The AA is a leader in the state for the production of peanuts, cotton, oil, and natural gas. The top individual employers in Gaines County are Seminole ISD, Seagraves ISD, Memorial Hospital, Key Energy Services, Hess Corporation, and Doss Fitness Memorial Hospital, all of which employ more than 100 people.

Banking competition is moderate in the AA. As of June 30, 2014, WTNB’s deposit market share in the AA was 27 percent, ranking second among six financial institutions. First United Bank (36 percent) is the leader in deposit market share accounting for 63 percent of the total. About 14 percent of WTNB’s loans and 16 percent of its deposits are attributable to this AA.

## Conclusions with Respect to Performance Tests

### LENDING TEST

#### Loan-to-Deposit Ratio

The loan-to-deposit ratio is reasonable given the bank's size, financial condition, and AAs credit needs. The bank’s quarterly average loan-to-deposit ratio is 53.80 percent since the last CRA evaluation in May 2011. During that time, WTNB's quarterly net loan-to-deposit ratio ranged from a low of 47.54 percent to a high of 60.91 percent. The average loan-to-deposit ratio of five similarly situated banks with asset sizes between \$450 million and \$1.1 billion operating within one or more of the AAs for the same period was 63.80 percent.

Loan-to-Deposit Ratios		
Institution	Total Assets (\$000s) as of 3/31/15	Quarterly Average Loan-to-Deposit Ratio
Community National Bank	1,176,980	57.30
Commercial State Bank	576,394	71.16
FirstCapital Bank of Texas, N.A.	968,974	67.49
Security Bank	946,767	71.64
West Texas State Bank	474,410	51.40
<b>West Texas National Bank</b>	<b>1,059,888</b>	<b>53.80</b>

*Source: Institution Reports of Condition from June 30, 2011 to March 31, 2015*

#### Lending in Assessment Areas

A majority of the WTNB’s primary loan products were made inside the bank’s AAs. We sampled 184 loans originated or purchased in 2012 and 2013. About 76 percent of the number of loans and 56 percent of the dollar amount of loans in the sample were made within the bank's combined AAs. Results by loan category are depicted in the following table:

Table 1 - Lending in AA										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Business	42	67	21	33	63	65,664	53	58,511	47	124,175
Farm	28	87	4	13	32	10,276	92	845	8	11,121
Consumer	69	78	20	22	89	1,275	71	518	29	1,793
Totals	139	<b>76</b>	45	24	184	77,215	<b>56</b>	59,874	44	137,089

*Source: Sample of loans.*

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

The distribution of loans made to businesses of different sizes and individuals of different income levels reflects an overall reasonable penetration for all AAs and all primary products.

Midland MSA AA

The distribution of loans to businesses reflects a reasonable penetration among businesses of different sizes. About 45 percent by number of commercial loans were made to businesses with gross annual revenues less than \$1 million, which is somewhat below demographic data showing that 69 percent of the AA’s businesses are considered small. The dollar amount percentages resulting from our sample included one loan of \$23 million that was 55 percent of the total amount of the sample. During this time, the oil and gas economy was strong, and loans to borrowers directly and indirectly involved in oil and gas were typically to larger businesses and were larger in dollar amount. The following table shows the results of our sample of business loans.

<b>Borrower Distribution of Loans to Businesses in the Midland MSA AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	68.51	5.20	26.28	100
% of Bank Loans in AA by #	<b>45.00</b>	40.00	15.00	100
% of Bank Loans in AA by \$	11.49	84.61	3.90	100

Source: Loan sample; Dunn and Bradstreet data.

The distribution of consumer loans reflects reasonable penetration among households of different income levels. The distribution of consumer loans to low-income households (15 percent) is below the demographic (24 percent). However, this is reasonable given that 12 percent of households are below the poverty level, making it more difficult to qualify for a loan. The distribution of consumer loans to moderate-income households (5 percent) is below the demographic (16 percent), and is poor. The following table shows the results of our sample of consumer loans.

<b>Borrower Distribution of Consumer Loans in the Midland MSA AA</b>								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans						
Consumer Loans	23.87	<b>15.00</b>	16.25	<b>5.00</b>	17.60	25.00	42.29	55.00

Source: Loan sample or data collected by the bank; U.S. Census data.

Trans Pecos AA

The borrower distribution for business loans reflects a reasonable penetration to businesses of different sizes. About 50 percent by number of commercial loans were made to businesses with gross annual revenues less than \$1 million, which is somewhat below demographic data showing that 67 percent of the AA’s businesses are considered small. The dollar amount percentages

resulting from our sample included one loan of \$22 million that was 91 percent of the total amount of the sample. The following table shows the results of our sample of business loans.

<b>Borrower Distribution of Loans to Businesses in Trans Pecos Region AA</b>				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	66.86	2.98	30.16	100%
% of Bank Loans in AA by #	<b>50.00</b>	40.91	9.09	100%
% of Bank Loans in AA by \$	4.47	93.19	2.34	100%

Source: Loan sample; Dunn and Bradstreet data.

The distribution of consumer loans reflects a reasonable penetration among households of different income levels. The distribution of consumer loans to low-income households (17 percent) is below the demographic (27 percent). However, this is reasonable given that 18 percent of households are below the poverty level, making it more difficult to qualify for a loan. The distribution of consumer loans to moderate-income households (9 percent) is slightly below the demographic (15 percent), and is reasonable. The following table shows the results of our sample of consumer loans.

<b>Borrower Distribution of Consumer Loans in Trans Pecos Region AA</b>								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans						
Consumer Loans	27.18	<b>17.39</b>	14.65	<b>8.70</b>	18.06	26.09	40.11	47.83

Source: Loan sample; U.S. Census data.

Gaines & Yoakum County AA

The borrower distribution for business loans reflects reasonable penetration to farms of different sizes. About 79 percent by number and 80 percent by dollar amount of agricultural loans were made to farms with gross annual revenues less than \$1 million, which is somewhat below demographic data showing that 95 percent of the AA’s farms are considered small. The following table shows the results of our sample of farm loans.

<b>Borrower Distribution of Loans to Farms in Gaines &amp; Yoakum Counties AA</b>				
Business Revenues	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Farms	95.07	3.87	1.06	100
% of Bank Loans in AA by #	<b>78.57</b>	21.43	0.00	100
% of Bank Loans in AA by \$	79.84	20.16	0.00	100

Source: Loan sample; Dunn and Bradstreet data.

The distribution of consumer loans reflects a reasonable penetration among households of different income levels. Consumer lending to moderate-income households (19 percent) is

excellent, significantly exceeding the demographic (10 percent). Consumer lending to low-income households (8 percent) is below the demographic (25 percent). However, this is reasonable as 18 percent of AA households are below the poverty level, making it more difficult to qualify for a loan. The following table shows the results of our sample of consumer loans.

Borrower Distribution of Consumer Loans in Gaines & Yoakum Counties AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Consumer Loans	25.15	<b>7.69</b>	10.27	<b>19.23</b>	15.71	23.08	48.87	50.00

Source: Loan sample; U.S. Census data.

### Geographic Distribution of Loans

Overall, WTNB’s geographic distribution of loans is reasonable for all applicable AAs and all primary products.

#### Midland MSA AA

The geographic distribution of loans to small businesses reflects reasonable dispersion. About 21 percent of commercial loans were originated in moderate-income CTs, which is reasonable and near the demographic of 25 percent. Commercial lending in low-income CTs is poor, but the demographic is very low, indicating that there are few small businesses in these CTs. The following table summarizes the distribution of loans in this AA.

Geographic Distribution of Loans to Businesses in Midland MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Commercial	2.42	<b>0.00</b>	25.35	<b>21.05</b>	40.27	31.58	31.52	47.37

Source: Loan sample; D & B data.

The geographic distribution of consumer loans reflects reasonable dispersion. Consumer lending in moderate-income CTs of 15 percent is reasonable, slightly above the demographic of 14 percent. Consumer lending in low-income CTs is poor, but note that the demographic is also quite low. The following table summarizes the distribution of loans in this AA.

Geographic Distribution of Consumer Loans in Midland MSA AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Consumer	5.08	<b>0.00</b>	14.29	<b>15.00</b>	47.94	70.00	32.70	15.00

Source: Loan sample; U.S. Census data.

Trans Pecos AA

The geographic distribution of loans to small businesses reflects reasonable dispersion. About 18 percent of commercial loans were originated in moderate-income CTs, which is excellent relative to the demographic of 9 percent. Commercial lending in the low-income CT is poor. The following table summarizes the distribution of loans in this AA:

Geographic Distribution of Loans to Businesses in Trans Pecos Region AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
Commercial	8.42	<b>0.00</b>	8.86	<b>18.18</b>	31.80	50.00	50.91	31.82

Source: Loan sample; D & B data.

The geographic distribution of consumer loans reflects excellent dispersion. Consumer lending in moderate-income CTs of 26 percent is excellent, significantly exceeding the demographic of 10 percent. Consumer lending in the low-income CT of 4 percent is reasonable, very near the demographic of 6 percent. The following table summarizes the distribution of loans in this AA.

Geographic Distribution of Consumer Loans in Trans Pecos Region AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Consumer	6.13	<b>4.35</b>	9.71	<b>26.09</b>	36.07	47.83	48.09	21.74

Source: Loan sample; U.S. Census data.

Gaines & Yoakum County AA

All CTs are middle-income; therefore, geographical distribution analysis is not meaningful.

**Responses to Complaints**

There have been no complaints related to the bank’s CRA performance during this evaluation period, which has a neutral effect on the bank’s overall performance.

## COMMUNITY DEVELOPMENT TEST

WTNB’s performance under the Community Development (CD) Test is rated Satisfactory. WTNB shows adequate responsiveness to CD needs in each AA through CD loans, qualified investments, and CD needs in its AAs through CD services.

### Number and Amount of Community Development Loans

The level of CD lending reflects an adequate responsiveness to CD needs of the AAs. WTNB originated 21 CD loans during the evaluation period totaling \$73.3 million, representing 77 percent of tier 1 capital. Sixteen of the loans are located within the bank’s AAs. WTNB also made five large, qualified loans outside of the assessment area.

In the Midland MSA AA, WTNB originated 11 loans totaling \$29.4 million during the evaluation period. The majority of loans were originated to not-for-profit organizations for affordable housing for low- to moderate-income individuals. One loan was made to a governmental entity to cover the costs of constructing a new water supply for the City of Midland, which was designated as a disaster area due to drought.

In the Trans-Pecos Region AA, WTNB originated five loans totaling \$8.7 million during the evaluation period. Four loans were used construct or renovate local businesses, which thus creating additional permanent jobs for low- to moderate-income individuals. One loan was for the renovation of affordable housing.

WTNB participated in five loans outside of the AA totaling \$35.1 million during the evaluation period. All five of the loans were used to construct affordable housing in San Marcos, TX; Schertz, TX; San Antonio, TX; and Harlingen, TX, all of which are located in and benefit the broader statewide or regional area.

### Number and Amount of Qualified Investments

The level of qualified investments reflects an adequate responsiveness to CD needs of the AAs. WTNB made qualified investments, grants, and donations totaling \$13.2 million within its AAs. All qualified investments specifically benefitted low- or moderate-income individuals or supported organizations with an economic revitalization purpose within the AAs. In the Midland MSA AA, WTNB invested \$2.7 million to construct infrastructure necessary to produce and deliver groundwater as the City of Midland was designated as a disaster area due to drought. Small Business Investment Corporations (SBICs) investments benefitting the broader statewide or regional area totaled \$6 million. WTNB was active in providing donations, particularly within the Midland MSA AA, to various organizations assisting low- and moderate-income individuals.

Qualified Investments		
Assessment Area	Number	Amount (\$000s)
Midland MSA	49	\$ 3,691
Gaines & Yoakum Counties	1	\$ 3
Trans-Pecos Region	7	\$ 11
Statewide/Regional	4	\$ 6,000
Out of AA	2	\$ 3,496
<b>Total</b>	<b>63</b>	<b>\$ 13,201</b>

### **Extent to Which Bank Provides Community Development Services**

The level of CD services reflects an adequate responsiveness to CD needs of the AAs. WTNB has met this need primarily by providing financial services through bank employees' financial expertise. CD service activities are responsive to the needs of low- and moderate-income individuals. WTNB provided CD services to a total of 15 organizations and WTNB employees provided 1,969.5 service hours of financial services to agencies and organizations involved in CD activity. The majority of service hours (1,715.5 or 87 percent) occurred in the Midland MSA AA due to the larger number of employees in that AA. The remaining hours occurred within the Trans-Pecos Region AA. The following activities had high impact and demonstrated strong leadership by the bank in the Midland MSA AA.

#### *Midland Memorial Hospital (MMH)*

During the period 2011-2013, WTNB's Marketing Director served as a member of the organization's Quality and Planning Committees. She used her financial expertise to help plan for the long-term financial viability of the hospital, as well as assisting with fundraising efforts. MMH is the only not-for-profit hospital in Midland County, established with a mission to make quality healthcare available to all residents. Financial assistance programs are offered to ensure healthcare is available to everyone, regardless of their ability to pay.

#### *Senior Link Midland (Formerly known as Community and Senior Services)*

WTNB employees volunteered 410 hours during 2011-2015 providing financial oversight to ensure the organization's ongoing financial viability, as well as assisting with fundraising efforts. Senior Link Midland is a private, nonprofit agency that offers a variety of programs designed to meet recognized needs in Midland, especially for the elderly. Some of their programs include Meals-on-Wheels, Homebound Services, Foster Grandparent, and Senior Companion.

Retail services are reasonably accessible to low- and moderate-income areas and individuals. In the Midland MSA AA, two of the bank's four branch locations are in moderate-income CTs. In the Trans-Pecos Region AA, one of the bank's five branch locations is in a low-income CT. The Gaines & Yoakum Counties AA only contains middle-income CTs.

### **Responsiveness to Community Development Needs**

WTNB demonstrated adequate responsiveness to CD needs in all three AAs, most notably by employing lending expertise to originate CD loans that are responsive to AA needs.

### **Fair Lending or Other Illegal Credit Practices Review**

Pursuant to 12 C.F.R. 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 assessment area by an affiliate whose loans have been considered as part of the bank's lending performance.

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