



PUBLIC DISCLOSURE

October 07, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Eagle Lake
Charter Number 7534
100 Commerce Street
Eagle Lake, TX 77434

Office of the Comptroller of the Currency

1301 McKinney Street
Suite 1410
Houston, TX 77010-3031

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

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Overall Rating

Institution's Community Reinvestment Act (CRA) Rating: This institution is rated Satisfactory.

The major factors that support this rating include:

- The average loan-to-deposit (LTD) ratio of 82 percent is more than reasonable given the bank's size, financial condition, market focus, competition, and lending opportunities in the assessment area (AA).
- A majority of our sample of loans, 66 percent by number and 47 percent by dollar volume, were originated within the AA.
- Lending activities of small loans to businesses and farms of different sizes reflects excellent penetration.
- Lending activities of small loans to businesses and small loans to farms reflects reasonable dispersion to borrowers located in moderate-income census tracts (CTs).
- There were no CRA related complaints during the evaluation period.

Description of Institution

The First National Bank of Eagle Lake (FNB) is a \$125 million community bank headquartered in Eagle Lake, Texas and located in Colorado County. The bank was chartered on December 30, 1904. It is wholly owned by Eagle Lake Bancshares, Inc., which is owned by approximately 72 shareholders who are mostly residents of the local community. FNB provides the community with full banking services. The community it serves is located within Colorado and Wharton counties. Eagle Lake is in a primarily rural and agricultural community.

The bank's main office is located at 100 Commerce Street in Eagle Lake, Texas, which is in a middle-income CT. The bank also has two additional full-service branches located at 138 S. Dill St. in East Bernard, Texas and 408 Walnut Street in Columbus, Texas. The East Bernard branch is in an upper-income CT and the Columbus branch is located in a middle-income CT. The bank has two non-deposit taking automated teller machines, one in Eagle Lake and one in East Bernard. All locations have reasonable hours of operation during the week. The East Bernard and Columbus branches are open for additional hours on Saturday. The bank offers 24-hour account access through online banking.

Commercial and agricultural lending is the bank's primary loan focus, with the majority of the loan portfolio consisting of business loans. Consumer and commercial real estate loans are also available to its customers. The bank offers standard deposit products and services, including financial education on their website.

There are no legal or financial factors impeding the bank's ability to meet the credit and community development needs of its AA. The bank was rated Satisfactory at its last CRA examination dated March 10, 2015.

We contacted a community representative to determine general banking and credit needs, as well as opportunities for local financial institutions to meet these needs. We spoke to someone from a small business development center of a local college. The representative stated that the community needs real estate and small business lending. It was also noted that the current economic condition of the county is good with stable growth prospects, which is supported by the declining unemployment rate.

Scope of Evaluation

FNB was evaluated under the Small Bank CRA Evaluation Procedures, which includes a Lending Test. This analyzes the bank's record of meeting the credit needs of its AA through lending activities. We also reviewed any complaints the bank received since the last examination.

The scope of the evaluation covered the time period from January 1, 2016 to December 31, 2018. We utilized call report information to review loan products for the evaluation period. We determined that 59 percent of the bank's loan portfolio consisted of commercial loans and 29 percent consisted of agricultural loans. To evaluate the bank's lending performance, we relied on a random sample of commercial and agricultural loans that were originated or purchased during the stated evaluation period.

As of December 30, 2018				
Product Type	Loan Portfolio by Dollar Volume		Loan Portfolio by Number of Loans	
	\$(000)	%	#	%
Commercial	48,028	59.45	190	40.00
Agriculture	23,667	29.30	169	35.58

Source: December 31, 2018 Report of Condition

Selection of Areas for Full-Scope Review

FNB has one AA which consists of all of Wharton and Colorado counties. The bank has properly defined its AA in accordance with the technical requirements of CRA regulations. The AA consists of whole CTs, does not arbitrarily exclude low- or moderate-income CTs, and includes CTs where the bank offices are located, and the majority of its loans are originated. The AA does not reflect illegal discrimination.

Ratings

Ratings for this CRA evaluation are based on the results of a full-scope reviews of the bank's AA.

Discriminatory or Other Illegal Credit Practices Review

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

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

Loan-to-Deposit Ratio

The bank's average quarterly LTD ratio, at 82 percent, is more than reasonable and exceeds the average for three similarly sized and situated institutions and is comparable to one similarly situated savings bank. The bank's ratio ranged between 73 percent and 95 percent over the last 18 quarters. The average LTD ratio for the four peer institutions was 32 percent, ranging between 9 percent and 87 percent.

Lending in Assessment Area

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

The bank originated 66 percent of the sampled loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. We relied on a total sample of 180 loans, originated or purchased since January 31, 2016 to perform our analysis. The following table reflects the distribution of loans, by number and dollar volume, as originated in or out of the AA.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Agriculture	62	68.89	28	31.11	90	17,978	54.18	15,201	45.82	33,179
Commercial	57	63.33	33	36.67	90	9,947	38.73	15,733	61.27	25,680
Total	119	66.11	61	33.89	180	27,925	47.44	30,934	52.56	58,859

*Source: Evaluation Period: 1/1/2016 - 12/31/2018 Bank Data
Due to rounding, totals may not equal 100.0*

LENDING TEST

The lending test is rated: Satisfactory

During the evaluation period, the bank did not have any CTs in low-income areas. We took this into consideration and focused on the bank's performance in moderate-income CTs.

Distribution of Loans by Income Level of the Geography

FNB exhibits reasonable geographic distribution of loans to borrowers in low- or moderate-income CTs.

Small Loans to Businesses

The geographic distribution of small loans to businesses in low- or moderate-income CTs reflects reasonable dispersion.

During both evaluation periods, there were no businesses located in low-income CTs. For the 2016 evaluation period, the bank did not make any small loans to businesses in moderate-income CTs. However, only 6.3 percent of businesses in the AA were in these tracts and only 3.8 percent of comparative institutions in the AA made loans to these businesses.

For the 2017 through 2018 evaluation period, the bank made 6.1 percent of its small loans to businesses in moderate-income CTs. This is significantly lower than both the demographic and aggregate comparators. This is reasonable given that the bank only has one moderate-income CT in their AA.

Refer to Table Q in 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.

Small Loans to Farms

The geographic distribution of small loans to farms in low- or moderate-income CTs reflects reasonable dispersion.

During both evaluation periods, there were no farms located in low-income CTs. For the 2016 evaluation period, the bank significantly exceeded the demographic and aggregate comparators for loans made in moderate-income CTs. However, for the 2017 through 2018 evaluation period, the bank made only 2.5 percent of its loans to farms in moderate-income CTs. This is significantly lower than both the demographic and aggregate comparators; however, this is reasonable based on the bank only having one moderate-income CT in their AA.

Refer to Table S in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Distribution of Loans by Income Level of the Borrower

FNB exhibits excellent distribution of small loans to businesses and farms of different sizes.

Small Loans to Businesses

The borrower distribution of small loans to businesses of different sizes reflects excellent penetration.

During both evaluation periods, loans made to small businesses were in line with demographic comparators and exceeded aggregate comparators. The bank made 79.2 percent and 78.8 percent of their loans to small businesses for the 2016 and 2017 through 2018 evaluation periods, respectively.

Refer to Table R in 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.

Small Loans to Farms

The borrower distribution of small loans to farms of different sizes reflects excellent penetration.

During both evaluation periods, loans made to small farms were significantly below demographic comparators but exceeded aggregate comparators. The bank made 76.2 percent and 75.6 percent of their loans to small farms for the 2016 and 2017 through 2018 evaluation periods, respectively.

Refer to Table T in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

Lending Gap Analysis

We did not identify any unexplained conspicuous gaps in our analysis.

Responses to Complaints

We reviewed all complaints filed during the evaluation period. There were no CRA-related complaints received.

Appendix A: Scope of Examination

The following table identifies the period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs 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:	January 1, 2016 to December 31, 2018	
Bank Products Reviewed:	Agriculture Commercial	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Wharton-Colorado AA	Full Scope	The AA includes all of Wharton and Colorado counties.

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

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other nonvisible features in some instances, CTs ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent core based statistical areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including low- or 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 nonrelatives 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 U.S. Census Bureau in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A CT with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/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 Federal Financial Institutions Examination Council annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a core based statistical area that contains an urbanized population of at least 2.5 million. A metropolitan division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The MSA comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rating Area: A rating area is a state or multi-state metropolitan statistical area (MMSA). For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a MMSA, the institution will receive a rating for the MMSA.

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the call report.

These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Appendix C: Community Profiles for Full-Scope Areas

Table A – Demographic Information of the Assessment Area – 2016						
Assessment Area: Colorado and Wharton Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	6.3	75.0	18.8	0.0
Population by Geography	62,154	0.0	3.0	67.9	29.1	0.0
Housing Units by Geography	27,457	0.0	2.4	68.9	28.7	0.0
Owner-Occupied Units by Geography	16,585	0.0	2.1	66.1	31.8	0.0
Occupied Rental Units by Geography	6,428	0.0	3.0	75.1	21.9	0.0
Vacant Units by Geography	4,444	0.0	2.5	70.9	26.6	0.0
Businesses by Geography	4,046	0.0	6.3	64.8	28.9	0.0
Farms by Geography	530	0.0	5.7	57.7	36.6	0.0
Family Distribution by Income Level	15,807	19.1	17.3	18.9	44.7	0.0
Household Distribution by Income Level	23,013	24.7	15.0	16.4	43.8	0.0
Median Family Income Non- MSAs - TX		\$47,817	Median Housing Value			\$93,840
			Median Gross Rent			\$612
			Families Below Poverty Level			11.8%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The 2010 census data and 2016 Dun & Bradstreet data shows 16 CTs in the AA. During the census review, there were no low-income CTs in the AA and 6.3 percent were identified as moderate-income. The MSA had a population of 62,154, with 3 percent of the people located in moderate-income CTs. Of the 4,046 businesses in the AA, 6.3 percent are in moderate-income CTs. Family distribution by income levels shows that 19.1 percent of families in the AA are considered low-income and 17.3 percent are considered moderate-income. The median family income for the AA is \$47,817, with 11.8 percent of families living below poverty level.

Table A – Demographic Information of the Assessment Area – 2017/2018						
Assessment Area: Colorado and Wharton Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs)	16	0.0	25.0	50.0	25.0	0.0
Population by Geography	62,021	0.0	17.1	50.6	32.2	0.0
Housing Units by Geography	27,832	0.0	15.2	50.8	34.0	0.0
Owner-Occupied Units by Geography	16,186	0.0	12.2	51.9	35.9	0.0
Occupied Rental Units by Geography	6,212	0.0	28.9	46.6	24.5	0.0
Vacant Units by Geography	5,434	0.0	8.6	52.4	38.9	0.0
Businesses by Geography	4,021	0.0	14.3	54.1	31.5	0.0
Farms by Geography	463	0.0	13.4	43.4	43.2	0.0
Family Distribution by Income Level	15,645	20.7	15.7	19.7	43.8	0.0
Household Distribution by Income Level	22,398	23.7	13.8	17.6	45.0	0.0
Median Family Income Non- MSAs - TX		\$52,076	Median Housing Value			\$105,613
			Median Gross Rent			\$665
			Families Below Poverty Level			13.2%
<i>Source: 2015 ACS Census and 2018 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The 2015 census data and 2018 Dun & Bradstreet data shows 16 CTs in the AA. During the census review, there were no low-income CTs in the AA and 25 percent were identified as moderate-income. The MSA had a population of 62,021, with 17.1 percent of the people located in moderate-income CTs. Of the 4,021 businesses in the AA, 14.3 percent are located in moderate-income CTs. Family distribution by income levels shows that 20.7 percent of families in the AA are considered low-income and 15.7 percent are considered moderate-income. The median family income for the AA is \$52,076, with 13.2 percent of families living below poverty level.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All MMSAs, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/AA. Deposit data are compiled by the Federal Deposit Insurance Corporation and are available as of June 30th of each year. Tables without data are not included in this PE.

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

- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income 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, it may be necessary to use geographic areas larger than the bank’s AA.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Wharton-Colorado AA	30	4,575	100	1,117	0.0	0.0	0.0	6.3	0.0	3.8	64.8	75.00	62.0	28.9	25.00	34.2	0.0	0.0	0.0
Total	30	4,575	100	1,117	0.0	0.0	0.0	6.3	0.0	3.8	64.8	75.00	62.0	28.9	25.00	34.2	0.0	0.0	0.0

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Wharton-Colorado AA	60	21,106	100	1,037	0.0	0.0	0.0	14.4	6.1	13.9	54.1	76.8	50.0	31.5	18.2	36.1	0.0	0.0	0.0
Total	60	21,106	100	1,037	0.0	0.0	0.0	14.4	6.1	13.9	54.1	76.8	50.0	31.5	18.2	36.1	0.0	0.0	0.0

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2016**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Wharton-Colorado AA	30	4,575	100	1,117	81.5	79.2	42.3	5.4	20.8	13.1	0.0
Total	30	4,575	100	1,117	81.5	79.2	42.3	5.4	20.8	13.1	0.0

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-18**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Wharton-Colorado AA	60	21,106	100	1,037	81.0	78.8	37.3	5.5	21.2	13.5	0.0
Total	60	21,106	100	1,037	81.0	78.8	37.3	5.5	21.2	13.5	0.0

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2016

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Wharton-Colorado AA	30	4,575	100	215	0.0	0.0	0.0	5.7	10.53	3.3	57.7	63.1	50.2	36.6	26.3	46.5	0.0	0.0	0.0
Total	30	4,575	100	215	0.0	0.0	0.0	5.7	10.53	3.3	57.7	63.1	50.2	36.6	26.3	46.5	0.0	0.0	0.0

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2017-18

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Wharton-Colorado AA	60	24,177	100	297	0.0	0.0	0.0	13.4	2.5	11.8	43.4	52.5	46.5	43.2	45.00	41.8	0.0	0.0	0.0
Total	60	24,177	100	297	0.0	0.0	0.0	13.4	2.5	11.8	43.4	52.5	46.5	43.2	45.00	41.8	0.0	0.0	0.0

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2016	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Wharton-Colorado AA	30	4,575	100	215	95.8	76.2	56.7	3.2	23.8	0.9	0.0	
Total	30	4,575	100	215	95.8	76.2	56.7	3.2	23.8	0.9	0.0	

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Wharton-Colorado AA	60	24,177	100	297	94.2	75.6	43.1	4.3	24.4	1.5	0.0	
Total	60	24,177	100	297	94.2	75.6	43.1	4.3	24.4	1.5	0.0	

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