



## **PUBLIC DISCLOSURE**

December 18, 2019

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Texas Heritage National Bank  
Charter Number 4701

107 Webb Street  
Daingerfield, TX 75638

Office of the Comptroller of the Currency

1800 West Loop 281, Suite 306  
Longview, TX 75604

**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 Community Reinvestment Act (CRA) Rating

**Institution's CRA Rating:** This institution is rated **Outstanding**.

**The Lending Test is rated: Outstanding.**

The major factors that support this rating include:

- The Lending Test rating is based on the excellent penetration of loans among farms of different sizes and borrowers of different income levels, a more than reasonable loan-to-deposit (LTD) ratio, and a majority of the institution's lending is within the assessment areas (AA).

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the institution's LTD ratio is more than reasonable. The LTD ratio is calculated on an institution-wide basis. The average quarterly LTD ratio for the institution during the evaluation period was 103.68 percent. The quarterly average LTD ratio for institutions similarly situated was 78.86 percent ranging from 68.85 percent to 103.68 percent.

### Lending in Assessment Area

A majority of the institution's loans are inside its AAs. The institution originated and purchased 67.50 percent of its total loans inside the institution's AAs during the evaluation period. This analysis is performed at the institution, rather than the AA level. This conclusion is based on a random sample of 20 farm loans and 20 consumer loans made in 2016, 2017, and 2018. The following table depicts the institution's lending in the AA during the evaluation period.

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		
	#	%	#	%		\$	%	\$	%	
Small Farm	12	60.00	8	40.00	20	903	30.24	2084	69.76	2986
Consumer	15	75.00	5	25.00	20	213	80.28	52	19.62	265
Total	27	67.50	13	32.50	40	1116	34.32	2136	65.68	3251

## Description of Institution

Texas Heritage National Bank (THNB or institution) is a single state institution headquartered in Daingerfield, Texas. THNB is wholly owned by Daingerfield Holding Company, also located in Daingerfield. THNB is a full-service institution that provides a traditional mix of loan and deposit products. Besides the main bank and automatic teller machine (ATM) in Daingerfield, the institution has three full-service branches and ATMs located in Omaha, Ore City, and Sulphur Springs, Texas.

As of December 31, 2018, THNB had total assets of \$134 million, total loans of \$106.9 million, total deposits of \$99.3 million, and tier 1 capital of \$15.5 million. Total loans represent approximately 80 percent of assets. THNB's loan portfolio is comprised of agricultural loans (40.96 percent), residential real estate loans (30.64 percent), commercial and industrial loans (22.05 percent), and consumer loans (6.36 percent). The institution's primary loan product is agricultural loans.

There are no legal or other factors that impede the institution's ability to meet the credit needs in its AAs. The institution's rating at the previous CRA examination, dated August 18, 2014, was "Outstanding".

The institution has two AAs and one rating area, which is the state of Texas. The AAs include Morris and Hopkins Counties in their entirety and one census tract (CT) in Cass County and one CT in Upshur County. Upshur County is part of the Longview metropolitan statistical area (MSA) and will be its own AA, while the other three non-MSA counties will be combined into one MSA. These AAs meet the requirements of the CRA regulation and do not arbitrarily exclude any low- or moderate-income (LMI) geographies.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated the CRA performance of THNB using Small Bank performance criteria. Our evaluation covered the period from January 1, 2016, through December 31, 2018. The institution's primary loan products in the non-MSA AA are agricultural and consumer loans. The primary loan product in the Upshur County AA is consumer loans.

### Selection of Areas for Full-Scope Review

In each state where the institution has an office, one or more of AAs within that state were selected for a full-scope review. For purposes of this evaluation, institution delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

THNB has two AAs in Texas comprised of one MSA (Upshur County) and one non-MSA. For our full-scope reviews, we selected both the non-MSA AA and the Upshur County AA. The full-scope AAs represent 100 percent of the institution's deposits as of December 31, 2018, and 100 percent of the total number of loans. For this evaluation, we did not have any limited-scope AAs to review. Refer to Appendix A for additional information.

## **Ratings**

The institution's overall rating is a blend of the state ratings, and where applicable, multistate ratings. THNB operates in one state and the state rating is based on performance in all of the institution's AAs.

## **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, institution) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the institution, or in any AA by an affiliate whose loans have been considered as part of the institution'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 engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information 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 Texas

**CRA rating for the State of Texas<sup>1</sup>:** Outstanding.

**The Lending Test is rated:** Outstanding.

The major factors that support this rating include:

- The penetration of loans to low- and moderate-income borrowers is excellent.
- The institution's LTD ratio was more than reasonable over the evaluation period.
- A majority of loan originations are within the institution's AA.

### Description of Institution's Operations in Texas

The institution operates in two AAs in the state of Texas as described in the "Description of Institution" and the "Scope of Evaluations" sections of this Performance Evaluation. The institution's primary business focus is agricultural and consumer lending; however, the institution offers a mix of loan products to meet the needs of the community. Therefore, primary products for analysis vary in each AA. A majority of the institution's lending is done in the non-MSA AA and therefore small farm loans and consumer loans were reviewed for analysis. The Upshur County AA represents a much smaller portion of the institution's loan portfolio and therefore consumer loans were reviewed for analysis in the AA. The institution's competitors include other local community institutions in its markets.

Community credit needs in the full-scope AAs were determined by reviewing recent housing demographic information and performing community contacts in the institution's AAs. Two community contacts were made during this evaluation period.

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

**Non-MSA AA****Table A – Demographic Information of the Assessment Area****Assessment Area: Combined**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of
Geographies (Census Tracts)	7	0.0	0.0	100.0	0.0	0.0
Population by Geography	30,544	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	13,795	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	8,330	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	3,330	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	2,135	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	1,572	0.0	0.0	100.0	0.0	0.0
Farms by Geography	91	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	8,548	20.4	20.2	20.6	38.7	0.0
Household Distribution by Income Level	11,660	23.6	17.5	17.1	41.8	0.0
Median Family Income Non-MSAs – TX		\$52,076	Median Housing Value			\$86,193
			Median Gross Rent			\$647
			Families Below Poverty Level			14.3%

*Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0  
 (\*) The NA category consists of geographies that have not been assigned an income classification.*

The non-MSA AA has a total population of 30,544. The AA is comprised of Morris County, Hopkins County, and one CT in Cass County. All of the CTs are designated middle-income geographies.

The local economy is stable, although many of the small towns do not have a strong work force. Most residents must travel to larger cities like Longview and Mt. Pleasant for employment. The local school districts are primarily the major employers in the AA. Demographic information indicates the unemployment rate is 4.73 percent and 17.18 percent of households live below poverty level.

A community contact made in the AA during the evaluation period indicated that small business loans and affordable housing is the AA's most critical needs. The contact felt that local institutions do a good job at meeting the community needs.

## Upshur County MSA

**Table A – Demographic Information of the Assessment Area**

Assessment Area: Upshur AA

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of
Geographies (Census Tracts)	1	0.0	0.0	100.0	0.0	0.0
Population by Geography	8,073	0.0	0.0	100.0	0.0	0.0
Housing Units by Geography	3,607	0.0	0.0	100.0	0.0	0.0
Owner-Occupied Units by Geography	2,460	0.0	0.0	100.0	0.0	0.0
Occupied Rental Units by Geography	516	0.0	0.0	100.0	0.0	0.0
Vacant Units by Geography	631	0.0	0.0	100.0	0.0	0.0
Businesses by Geography	304	0.0	0.0	100.0	0.0	0.0
Farms by Geography	13	0.0	0.0	100.0	0.0	0.0
Family Distribution by Income Level	2,236	13.8	20.8	26.2	39.3	0.0
Household Distribution by Income Level	2,976	23.5	14.7	19.1	42.7	0.0
Median Family Income 30980 Longview, TX MSA		\$56,689	Median Housing Value			\$90,300
			Median Gross Rent			\$989
			Families Below Poverty Level			13.0%

Source: 2015 ACS Census and 2018 D&B Data Due to rounding, totals may not equal 100.0

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

The Upshur County AA has a total population of 8,073. It is made up of one CT in Upshur County. The CT is a middle-income CT.

The local economy is stable; however, the available employment opportunities are scarce. Most residents must travel to larger cities for employment. The local school district is the major employer in the AA. Demographic information indicates the unemployment rate is 3.81 percent and 16.3 percent of households live below the poverty level.

A community contact made in the AA during the evaluation period indicated there is not a lot of development in the AA and basic banking services are the primary need. There is minimal competition in the AA and the contact indicated the financial institutions are providing needed banking services.

### Scope of Evaluation in Texas

As discussed earlier, the non-MSA AA and the Upshur County AA were both selected for a full-scope review. Agricultural loans and consumer loans were sampled for the non-MSA AA and consumer loans were sampled for the Upshur County AA. Refer to the table in Appendix A for a list of all AAs under review.

For the Lending Test, separate analyses were conducted for the year 2016. The years 2017 and 2018 were combined and analyzed separately due to the 2015 American Consumer Survey (ACS) U.S. Census that applies to 2017 and 2018. The 2010 U.S. Census applies to 2016. Comparative data was different for each census change, as well as income levels for some CTs also referred to as geographies.



## **LENDING TEST**

The institution's performance under the Lending Test in Texas is rated Outstanding. Based on full-scope reviews, the institution's lending performance in the state of Texas is excellent.

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

A geographic analysis of lending activity in the AA was not performed. There are no low- or moderate-income geographies located in the AA, therefore an analysis would not be meaningful.

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

The institution exhibits an excellent penetration of loans to individuals of different income levels and farms of different sizes, given the product lines offered by the institution.

#### **Non-MSA AA**

##### ***Small Loans to Farms***

The borrower distribution of small loans to farms is excellent. Refer to Table T in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

In 2016, the institution's loans to farms with revenues less than or equal to \$1 million was slightly below the percentage of businesses identified as having revenues less than or equal to \$1 million but exceeded the aggregate lending for these farms.

In 2017-2018, the institution's loans to farms with revenues less than or equal to \$1 million exceeded both the percentage of farms identified as having revenues less than or equal to \$1 million as well as the aggregate lending for these farms.

##### ***Consumer Loans***

The borrower distribution of consumer loans in the AA is excellent. Refer to Table V in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's consumer loan originations and purchases.

In 2016, the institution's loans to low- and moderate-income borrowers exceeded the percentage of households in the AA.

In 2017-2018, the institution's loans to low-income borrowers was less than the percentage of low-income households; however, loans to moderate-income borrowers significantly exceeded the percentage of moderate-income households in the AA.

## **Upshur County AA**

### ***Consumer Loans***

The borrower distribution of consumer loans in the AA is excellent. Refer to Table V in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of households in the AA.

In 2016, the institution's loans to low-income borrowers was less than the percentage of low-income households; however, loans to moderate-income borrowers significantly exceeded the percentage of moderate-income households in the AA.

In 2017-2018, the institution's loans to low-income borrowers significantly exceeded the percentage of low-income households and loans to moderate-income borrowers was just below the percentage of moderate-income households in the AA.

### **Responses to Complaints**

The institution did not receive any CRA-related complaints during this evaluation period.

## Appendix A: Scope of Examination

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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 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”.

<b>Time Period Reviewed:</b>	01/01/2016-12/31/2018	
<b>Bank Products Reviewed:</b>	Small Farm Consumer	
<b>Affiliates</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>MMSAs</b>		
<b>Texas</b>		
Non-MSA	Full-scope	
Upshur County	Full-scope	

## Appendix B: Summary of MMSA and State Ratings

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<b>RATINGS</b>	
<b>Overall Bank:</b>	<b>Lending Test Rating</b>
Texas Heritage National Bank	Outstanding
<b>MMSA or State:</b>	
Texas	Outstanding

## Appendix C: Definitions and Common Abbreviations

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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, an institution subsidiary is controlled by the institution and is, therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders (Home Mortgage Disclosure Act (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 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.

**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 non-metropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate an institution's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the institution, and to take this record into account when evaluating certain corporate applications filed by the institution.

**Consumer Loan:** A loan 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 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 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 Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, 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 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 to Business:** 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 to Farm:** 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 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.

## Appendix D: Tables of Performance Data

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### 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 the “institution” include activities of any affiliates that the institution 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 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 MMSA/AA. Deposit data are compiled by the Federal Deposit Insurance Company and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this Performance Evaluation.

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the institution in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the institution to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.
- 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 institution 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 is not available for geographic areas smaller than counties, it may be necessary to compare institution loan data to aggregate data from geographic areas larger than the institution’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 institution 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 institution 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 institution'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 institution 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 U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the institution in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the institution to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2016</b>
<b>Assessment Area:</b>	<b>Total Loans to Farms</b>				<b>Farms with Revenues &lt;= 1MM</b>			<b>Farms with Revenues &gt; 1MM</b>		<b>Farms with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>% Farms</b>	<b>% Bank Loans</b>
Non-MSA	20	3,687	100	29	99	95	79.3	0	5	1	0
<b>Total</b>	20	3,687	100	29	99	95	79.2	0	5	1	0

*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*

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>											<b>2017-2018</b>
<b>Assessment Area:</b>	<b>Total Loans to Farms</b>				<b>Farms with Revenues &lt;= 1MM</b>			<b>Farms with Revenues &gt; 1MM</b>		<b>Farms with Revenues Not Available</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Farms</b>	<b>% Bank Loans</b>	<b>% Farms</b>	<b>% Bank Loans</b>
Non-MSA	20	1,506	100	45	97.8	100	80	1.1	0	1.1	0
<b>Total</b>	20	1,506	100	45	97.8	100	80	1.1	0	1.1	0

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

<b>Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>												<b>2016</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>
Non-MSA	20	181	100	26.1	30	14.1	15	19.1	35	40.6	20	0.0	0.0
Upshur County	20	127	100	25.6	20	18.0	35	17.9	15	38.4	30	0.0	0.0
<b>Total</b>	<b>40</b>	<b>308</b>	<b>100</b>	<b>26.0</b>	<b>25</b>	<b>14.9</b>	<b>25</b>	<b>18.9</b>	<b>25</b>	<b>40.2</b>	<b>25</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0*

<b>Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>												<b>2017-2018</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>	
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>
Non-MSA	20	196	100	23.6	10	17.5	25	17.1	25	41.8	40	0.0	0.0
Upshur County	20	191	100	23.5	35	14.7	10	19.1	20	42.7	35	0.0	0.0
<b>Total</b>	<b>40</b>	<b>387</b>	<b>100</b>	<b>23.5</b>	<b>22.5</b>	<b>17.0</b>	<b>17.5</b>	<b>17.5</b>	<b>22.5</b>	<b>42.0</b>	<b>37.5</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data. Due to rounding, totals may not equal 100.0*