

## PUBLIC DISCLOSURE

August 9, 2018

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank in Cooper Charter Number 13046

> 11 Westside Square Cooper, TX 75432

Office of the Comptroller of the Currency Dallas Field Office 225 E. John Carpenter Frwy., Suite 900 Irving, TX 75062

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

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## **Overall CRA Rating**

#### This institution is rated: Satisfactory.

#### The Lending Test is rated: Satisfactory.

The following factors support the overall rating:

- The bank has a reasonable loan-to-deposit ratio compared to peer banks and lending opportunities within the assessment area.
- A majority of the bank's primary loan products were originated inside the assessment area.
- The distribution of loans reflects reasonable distribution among borrowers of different income levels and businesses of different sizes and meets the standard for satisfactory performance.
- The geographic distribution of loans reflects reasonable distribution throughout the assessment area and meets the standard for satisfactory performance.
- The bank has not received any CRA related complaints during the evaluation period.

## **Definitions and Common Abbreviations**

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is; therefore, an affiliate.

**Aggregate Lending:** The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people. Their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community Development:** 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; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity 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 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 census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area 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), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 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 income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

**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 MA/assessment area.

**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. 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 it and half below it.

**Metropolitan Area (MA):** Any metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget, and any other area designated as such by the appropriate federal financial supervisory agency.

**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:** 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 Metropolitan Statistical Area 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.

**Other Products:** Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

**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.

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

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

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

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

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

## **Description of Institution**

The First National Bank in Cooper (FNB) is a \$45 million community bank located in Cooper, Delta County, Texas. FNB is wholly owned by Cooper Lake Financial Corporation, a one-bank holding company. The bank is a single-state institution and operates from one location with drive-thru banking and an Automated Teller Machine. FNB is a full service institution that offers traditional, non-complex loan and deposit products. No branches have been opened since the previous CRA evaluation.

The bank's lending strategy focuses on small business lending, while also promoting consumer lending and one-to-four family real estate loans to meet the needs of the community. As of June 30, 2018, FNB had loans of \$21.2 million, or 47 percent of total assets.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its assessment area (AA). The bank's CRA performance was previously evaluated as of February 18, 2014, with an overall level of performance of "Satisfactory".

## Scope of the Evaluation

#### **Evaluation Period/Products Evaluated**

This Performance Evaluation (PE) is an assessment of FNB's ability to meet the credit needs of the communities in which it operates. The examination included a full-scope review of one AA, which included all census tracts in Delta County, under the Small Bank CRA procedures. Small Bank CRA procedures include a Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of the AA through its lending activities.

Conclusions regarding the Lending Test are based on loan samples of FNB's primary lending products originated from January 1, 2015, through December 31, 2017. During 2015 and 2016, FNB's primary lending products were loans to consumers by both number and dollar volume. For 2017, FNB's primary lending products were loans to businesses by dollar volume and loans to consumers by number of loans. The following tables provide additional information on the lending activity during the evaluation period.

Loans Origina	ated during (2015-2	•	ation Period	
Loan Category	\$ (000)	% Dollar Volume	Number of Loans	% of Number
1-4 Family Residential RE Loans	\$1,949	37.6%	26	14.3%
Agricultural Loans	\$1,256	24.3%	44	24.2%
Consumer Loans	\$1,039	20.1%	88	48.4%
Business Loans	\$883	17.1%	23	12.6%
Other Loans	\$50	1.0%	1	0.5%
Total	\$5,177	100.0%	182	100.0%

Loans Origina	ated during (201		ation Period								
Loan Category\$ (000)% Dollar VolumeNumber of Loans% of Number											
Business Loans	\$3,749	46.2%	40	14.1%							
1-4 Family Residential RE Loans	\$1,962	24.2%	17	6.0%							
Consumer Loans	\$1,279	15.7%	188	66.2%							
Agricultural Loans	\$1,125	13.9%	39	13.7%							
Total	\$8,155	100.0%	284	100.0%							

#### **Data Integrity**

Not applicable. The bank is not required to report loan information under HMDA.

#### Selection of Areas for Full-Scope Review

The Delta County AA will receive a full-scope review.

#### Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews. FNB has only one AA; therefore, the bank's overall rating is based solely on the full-scope review of the Delta County 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 assessment area 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 Consumer Financial Protection Bureau, as applicable.

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

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next Performance Evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this Performance Evaluation.

## **Conclusions with Respect to Performance Tests**

### LENDING TEST

FNB's performance under the Lending Test is Satisfactory. The bank's loan-to-deposit (LTD) ratio is reasonable given the bank's performance context, and a majority of lending occurred within the AA. Additionally, the distribution of loans geographically and to borrowers and businesses of different income levels is reasonable. Overall, FNB meets the standard for satisfactory performance for lending within its AA.

#### Loan-to-Deposit Ratio

The LTD ratio for FNB is reasonable given the bank's size, financial condition, and AA credit needs. The bank's quarterly average LTD ratio since the previous CRA examination is 45.62 percent, compared to an average LTD ratio of 90.33 percent for a similarly situated institution with total assets of \$35 million. While the bank's percentage is lower than the comparator, FNB originates numerous small dollar loans to serve and meet the needs of the community. The LTD ratio is calculated on a bank-wide basis.

#### Lending in Assessment Area

A majority of the bank's lending activity is within the AA. We tested a random sample of 20 small business and 40 consumer loans originated from January 1, 2015 to December 31, 2017. The majority of both number of loans and dollar volume of loans are above 50 percent at 65.0 percent and 53.3 percent, respectively. The following table provides additional information on the lending inside the AA.

		Number o	of Loans	5		Dollar A	mount of	Loans \$	5(000s)	
_oan Category	Inside		Outside		Total #	Inside		Outside		Total
	#	%	#	%	#	\$	%	\$	%	\$(000s
Small Business	10	50.0	10	50.0	20	736	46.4	851	53.6	1,587
Consumer	29	72.5	11	27.5	40	356	77.2	105	22.8	461
Total	39	65.0	21	35.0	60	1,092	53.3	956	46.7	2,048

Source: Evaluation Period: 01/01/2015-12/31/2017 Bank Data. Due to rounding, totals may not equal 100.0.

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

The overall distribution of loans to borrowers of different income levels and businesses of different sizes reflects reasonable distribution given the overall demographics of the AA.

Refer to Table R and V in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

#### **Small Loans to Businesses**

Based on the data in Table R in Appendix C, the borrower distribution of business loans in the AA is reasonable and meets the standard. By number of loans made, FNB's percentage of lending to AA small businesses is reasonable and near the percentage of reporting AA small businesses with gross annual revenues of less than \$1 million. However, the bank's percentage of lending to AA small businesses by dollar volume exceeds the aggregate distribution of loans to those businesses.

#### **Consumer Loans**

Based on the data in Tables V in Appendix C, the borrower distribution of consumer loans in the AA reflects reasonable distribution; however, a reliable conclusion could not be drawn over the sample reviewed for the 2015-2016 evaluation period due to lack of income data maintained by FNB. Based on 2017 data, the percentage of loans to low-income borrowers reflects poor distribution compared to the percentage of low-income households in the AA. Although performance does not meet the standard, the poor distribution is attributed to the high number of families living below poverty level within the AA at 16 percent, resulting in fewer lending opportunities to low-income borrowers. Lending to moderate-income borrowers reflects excellent distribution and exceeds the percentage of moderate-income households in the AA.

#### **Geographic Distribution of Loans**

The overall geographic distribution of loans reflects reasonable distribution given the demographics of the area. A geographic analysis of lending activity was not performed for the 2015-2016 review given there were no low- or moderate-income geographies located in the AA, and analysis would not be meaningful. For 2017, approximately two-thirds of loans originated by FNB were consumer loans; therefore, we placed greater emphasis on the geographic distribution on consumer loans in the overall conclusion.

Refer to Table Q, and U in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

#### **Small Loans to Businesses**

Based on 2017 data in Table Q in Appendix C, the geographic distribution of loans to small businesses reflects reasonable distribution within the AA. Although FNB's percentage of loans to businesses in moderate-income CTs is less than the percentage of AA businesses located in moderate-income CTs, the performance is considered reasonable. For 2017, there are fewer small businesses (revenues less than \$1 million) located in the moderate-income CT.

#### **Consumer Loans**

Based on 2017 data in Table U in Appendix C and performance context factors, the geographic distribution of loans to consumers reflects excellent distribution and significantly exceeds the percentage of households in moderate-income CTs.

#### **Responses to Complaints**

FNB has not received any complaints or public comments regarding CRA performance during this evaluation period.

## **Appendix A: Scope of Examination**

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas 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	Lending Test (exclude Investment and Service CD Loans: Not Applice					
Financial Institution		Products Reviewed				
The First National Bank in Cooper Cooper, TX	(FNBC)	Business and Consumer Loans				
Affiliate(s)	Affiliate Relationship	Products Reviewed				
None						
List of Assessment Areas and Ty	pe of Examination					
Assessment Area	Type of Exam	Other Information				
Delta County	Full-Scope					

## **Appendix B: Community Profiles for Full-Scope Areas**

Table A - Demograp Assessmer			n of the A unty 2010 (		nt Area	
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.0	0.0	50.0	50.0	0.0
Population by Geography	5,231	0.0	0.0	43.2	56.8	0.0
Housing Units by Geography	2,456	0.0	0.0	40.4	59.6	0.0
Owner-Occupied Units by Geography	1,644	0.0	0.0	32.8	67.2	0.0
Occupied Rental Units by Geography	401	0.0	0.0	64.1	35.9	0.0
Vacant Units by Geography	411	0.0	0.0	47.2	52.8	0.0
Businesses by Geography	280	0.0	0.0	45.0	55.0	0.0
Farms by Geography	41	0.0	0.0	26.8	73.2	0.0
Family Distribution by Income Level	1,319	20.6	15.2	18.7	45.4	0.0
Household Distribution by Income Level	2,045	29.8	14.6	14.0	41.6	0.0
Median Family Income Non-MSAs - GA		\$47,817	Median Housing	Value		\$62,610
			Median Gross Re	\$75		
			Families Below F	9.1%		

Source: 2010 U.S. Census and 2016 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.

## Table A - Demographic Information of the Assessment Area

Assessment Area: Delta County 2015 Census

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2	0.0	50.0	50.0	0.0	0.0
Population by Geography	5,223	0.0	43.2	56.8	0.0	0.0
Housing Units by Geography	2,468	0.0	44.1	55.9	0.0	0.0
Owner-Occupied Units by Geography	1,496	0.0	37.7	62.3	0.0	0.0
Occupied Rental Units by Geography	432	0.0	74.1	25.9	0.0	0.0
Vacant Units by Geography	540	0.0	37.8	62.2	0.0	0.0
Businesses by Geography	283	0.0	48.1	51.9	0.0	0.0
Farms by Geography	43	0.0	20.9	79.1	0.0	0.0
Family Distribution by Income Level	1,442	23.2	18.1	18.2	40.4	0.0
Household Distribution by Income Level	1,928	23.9	20.3	11.9	43.9	0.0
Median Family Income Non-MSAs - GA		\$52,076	Median Housing	Value		\$72,717
			Median Gross R	ent		\$699
			Families Below F	16.0%		

Source: 2015 ACS Census and 2017 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 city of Cooper, Texas is the county seat of Delta County. The county consists of two CTs, one moderate-income and one upper-income as of 2017. The current condition of the local community is stable. Major employers are TexTrail, a trailer tire manufacturer, a cotton gin and warehouse facility, and the local nursing home.

As part of this examination, we contacted a local organization within the community. The organization is a non-profit organization, funded by businesses who are members. The organization promotes the community through sponsoring various community wide activities and stated local financial institutions are willing to participate financially in the needs of the community.

## **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan areas 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 Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) "aggregate" is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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<br/>of the Geography Compares the percentage distribution of the number of loans<br/>originated and purchased by the bank in low-, moderate-, middle-, and upper-<br/>income geographies to the percentage distribution of owner-occupied housing<br/>units throughout those geographies. The table also presents aggregate peer data<br/>for the years the data is available.
- Table P.Assessment Area Distribution of Home Mortgage Loans by Income Category<br/>of the Borrower Compares the percentage distribution of the number of loans<br/>originated and purchased by the bank to low-, moderate-, middle-, and upper-<br/>income borrowers to the percentage distribution of families by income level in each<br/>MA/assessment area. The table also presents aggregate peer data for the years<br/>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 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) throughout those geographies. Because small business data is 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 assessment area.
- Table R.Assessment Area Distribution of Loans to Small Businesses by Gross<br/>Annual Revenue Compares the percentage distribution of the number of small<br/>loans (less than or equal to \$1 million) originated and purchased by the bank to<br/>businesses with revenues of \$1 million or less to the percentage distribution of<br/>businesses with revenues of \$1 million or less. In addition, the table presents the<br/>percentage distribution of the number of loans originated and purchased by the

bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

- Table S.Assessment Area Distribution of Loans to Farms by Income Category of the<br/>Geography The percentage distribution of the number of small loans (less than<br/>or equal to \$500,000) to farms originated and purchased by the bank in low-,<br/>moderate-, middle-, and upper-income geographies compared to the percentage<br/>distribution of farms (regardless of revenue size) throughout those geographies.<br/>Because small farm data is not available for geographic areas smaller than<br/>counties, it may be necessary to use geographic areas larger than the bank's<br/>assessment area.
- Table T.Assessment Area Distribution of Loans to Farms by Gross Annual Revenues<br/>- Compares the percentage distribution of the number of small loans (less than or<br/>equal to \$500,000) originated and purchased by the bank to farms with revenues<br/>of \$1 million or less to the percentage distribution of farms with revenues of \$1<br/>million or less. In addition, the table presents the percentage distribution of the<br/>number of loans originated and purchased by the bank by loan size, regardless of<br/>the revenue size of the farm. The table also presents aggregate peer data for the<br/>years the data is available.
- Table U.Assessment Area Distribution of Consumer Loans by Income Category of<br/>the Geography Compares the percentage distribution of the number of loans<br/>originated and purchased by the bank in low-, moderate-, middle-, and upper-<br/>income geographies to the percentage distribution of households throughout those<br/>geographies.
- Table V.Assessment Area Distribution of Consumer Loans by Income Category of<br/>the Geography Compares the percentage distribution of the number of loans<br/>originated and purchased by the bank to low-, moderate-, middle-, and upper-<br/>income borrowers to the percentage distribution of households by income level in<br/>each MA/assessment area.

## Table Q: Assessment Area Distribution of Loans to Small Businesses by IncomeCategory of the Geography

			<b>U</b> I										
		al Loans I Busine		Low-Income Tracts		Moderate-Inc Tracts	Moderate-Income Tracts		Middle-Income Tracts		ne	Not Available- Income Tracts	
Assessment Area:	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Delta County	20	815	100.0	0.0	0.0	48.1	25.0	51.9	75.0	0.0	0.0	0.0	0.0
Total	20	815	100.0	0.0	0.0	48.1	25.0	51.9	75.0	0.0	0.0	0.0	0.0
Source: 2017 D&B L	Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; "Aggregate"												

2017

data not available. Due to rounding, totals may not equal 100.0

# Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual2017Revenues

	То	tal Loans to	Small Busines	ses	Businesse	s with Reven	ues <= 1MM	Business Reve		Businesses with Revenues Not	
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Delta County	20	815	100.0	54	84.1	75.0	42.6	1.8	0.0	14.1	25.0
Total	20	815	100.0	54	84.1	75.0	42.6	1.8	0.0	14.1	25.0

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

# Table U: Assessment Area Distribution of Consumer Loans by Income Category of theGeography

	1	Fotal Con	sumer Loans	Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Denton County	20	335	100.0	0.0	0.0	0.0	0.0	39.0	55.0	61.0	45.0	0.0	0.0
Source: 2010 Due to roundi		,		1/2016 Bank Dat	a.								

2015-

2016

2017

### Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography

	٦	Fotal Con	sumer Loans	Low-Income Tracts		Moderate-Inc	Moderate-Income Tracts		Middle-Income Tracts		ne Tracts	Not Available-Income Tracts	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Denton County	20	97	100.0	0.0	0.0	45.9	75.0	54.1	25.0	0.0	0.0	0.0	0.0
	punty purce: 2015 ACS Census; 01/01/2017 - 12/31/2017 Bank Data. ue to rounding, totals may not equal 100.0.												

## Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower

2015-16

	То	tal Consu	imer Loans	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Household s	% Bank Loans
Denton County	20	335	100.0	29.8	5.0	14.6	0.0	14.0	10.0	41.6	10.0	0.0	75.0
Total	20	335	100.0	29.8	5.0	14.6	0.0	14.0	10.0	41.6	10.0	0.0	75.0
	purce: 2010 U.S Census; 01/01/2015 - 12/31/2016 Bank Data. le to rounding, totals may not equal 100.0.												

## Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower

2017

	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Denton County	20	97	100.0	23.9	10.0	20.3	30.0	11.9	15.0	43.9	25.0	0.0	20.0
Total	20	97	100.0	23.9	10.0	20.3	30.0	11.9	15.0	43.9	25.0	0.0	20.0

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