



PUBLIC DISCLOSURE

August 5, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Santa Anna National Bank
Charter Number 13854

610 Wallis Ave
Santa Anna, TX 76878

Office of the Comptroller of the Currency

Fort Worth Field Office
9003 Airport Freeway, Suite 275
North Richland Hills, TX 76180

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

Institution's CRA Rating: Outstanding

The lending test is rated: Outstanding

The major factors that support this rating include:

- The Lending Test rating is based on performance in the Bank's one Assessment Area (AA). We noted a substantial majority of the Bank's loan originate within the AA and the distribution of loans to individuals and businesses of different income levels is excellent.
- Community Development (CD) lending and investments were reviewed at the bank's option. CD Lending and Investment performance is excellent.

Loan-to-Deposit Ratio

Considering the Bank's size, financial condition, and credit needs of the AA, the Bank's loan-to-deposit (LTD) ratio is more than reasonable.

The Bank's size is the only limiting factor in terms of making larger commercial loans. The primary credit needs of the community include small business loans, personal loans, and home improvement loans. Because these are all small dollar transactions, they do not yield a high LTD ratio. The Bank's LTD ratio compares favorably to that of similarly situated institutions. The Bank's quarterly LTD ratio during the assessment period was 63.27 percent. We compared the Bank's LTD ratio to nine similarly situated institutions. Three of the institutions we used for comparison have larger asset sizes but are located in the local market. The asset size of those three institutions ranges from \$118 million to \$499 million. The remaining six institutions have similar asset sizes, ranging from \$48 million to \$71 million, and are located in similar, rural communities within 150 miles of the Bank. The aggregate average LTD ratio for the other institutions was 55.35 percent. The LTD ratios for these six institutions range from a low of 17.93 percent to a high of 90.48 percent. When evaluating only the institutions of similar asset size, the aggregate average LTD ratio is 42.66 percent with a low of 17.93 percent and a high of 60.46 percent.

Lending in Assessment Area

A substantial majority of the Bank's loans are inside the AA. The Bank originated and purchased 79.9 percent of its total loans inside the Bank's AAs during the evaluation period. This analysis is performed at the Bank level rather than the AA. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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 Business	501	79.90	126	20.10	627	9,175	66.4	4,643	33.6	13,818
Consumer	103	79.23	27	20.77	130	2,360	73.41	845	26.28	3,215
Total	604	79.79	153	20.21	757	11,535	67.72	5,488	32.22	17,033

Source: 1/1/2016 - 12/31/2018 Bank Data entire population taken for Small Business loans; sample of Consumer loans taken for analysis
Due to rounding, totals may not equal 100.0

Description of Institution

The Santa Anna National Bank (SANB) is a \$51 million institution headquartered in Santa Anna, TX. Santa Anna is located in Coleman County. The Bank operates one location in Santa Anna, TX. It is the only bank with a physical location in the town. As of December 31, 2018, SANB had loans totaling \$27.2 million, or 55.2 percent of total assets. The Bank is owned 66 percent by one individual. The Bank is a minority or woman owned institution. There are no other subsidiaries or affiliates and there was no merger or acquisition activity during the evaluation period.

As of December 31, 2018, the Bank had \$40.4 million in core deposits representing 79.25 percent of average assets. Loan products are traditional including financing for small businesses, small farms, and personal loans. The Bank is located in a rural area and the AA includes two CTs classified as distressed middle-income CTs based on poverty rates. The SANB strategy focuses on serving customers in the rural areas of the AA. Due, in part, to the Bank's small size and strategy to focus on rural areas, loan amounts tend to be small. This is particularly true of small business loans and consumer loans for personal expenses. The loan portfolio mix is 31 percent commercial loans, 30 percent real estate loans, 25 percent agriculture loans, and 14 percent consumer loans. While consumer loans make up only 14 percent of the portfolio by dollar volume, they represent a majority of the number of loans made during the assessment period.

There are no legal, financial, or other factors impeding SANB's ability to help meet the credit needs in of the AA. SANB received an overall rating of "Satisfactory" at the last CRA evaluation dated October 6, 2014.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a full-scope review of SANB's CRA activities in its AA under the Small Bank CRA procedures. This included the Lending Test and at the Bank's option a review of CD lending and investments. The Lending Test evaluates the Bank's record of meeting the credit needs of the AA through its lending activities. CD activities were reviewed to evaluate responsiveness to CD needs in the AA through qualified CD lending, investments and donations, and services.

Loan information used for this evaluation included a sample of small business loans and consumer loans from 2016, 2017, and 2018. Conclusions regarding CD activities were based on CD activities during the same period.

Selection of Areas for Full-Scope Review

In each state where the Bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (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.

Because the bank has only one location and one AA, we performed full-scope review of the one AA. The AA is not in an MSA or an MMSA and is not a combination of more than one non-MSA AA.

Ratings

The Bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The Bank's strategy is focused on serving consumers and businesses in the rural areas of the AA. Performance in small business lending and consumer lending are weighted equally.

The state rating is based on performance in the 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.

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.

State Rating

State of Texas

CRA rating for the State of Texas¹: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The Bank's LTD ratio is more than reasonable, reflecting strong responsiveness to credit needs in the AA.
- A substantial majority of the loans were originated inside the Bank's AA.
- The distribution of loans to individuals and businesses of different income levels is excellent and meets the standard for Outstanding performance.
- The geographic distribution of loans is excellent and meets the standard for Outstanding performance.
- CD activities including lending, investments, services, and donations reflect excellent responsiveness to CD needs within the AA.

Description of Institution's Operations in Texas

The Bank operates only in Texas (TX). The information provided in the Description of Institution section of this PE describes the institution's operations in TX.

We conducted an interview with one community contact in conjunction with this evaluation. The contact was with a local business owner in Santa Anna, TX. The contact identified small business lending and consumer loans for personal expenses as a credit need in the community. The contact also identified affordable housing and loans for home improvement purposes as credit needs in the community.

Scope of Evaluation in Texas

The Bank has only one AA. We performed a full-scope review of performance in the AA. The designated AA is reasonable given the Bank's size and financial condition, and the credit needs of the AA. The AA consists of six contiguous census tracts (CTs) in Coleman and Western Brown Counties. The AA includes all three whole CTs in Coleman County and three whole CTs making up the western portion of Brown County. Coleman and Brown Counties are not located in an MSA or MMSA. Of the three CTs in Coleman County, one is moderate-income and two are distressed middle-income. The distressed status is based on poverty rates in the tracts. The three CTs in Brown County are middle-income. The Bank included in its AA only the rural CTs in Brown County contiguous to the Coleman County CTs. The Bank has not included all of Brown County in its AA because it cannot reasonably be expected to serve all of Brown County as other, larger institutions dominate the market including the

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

City of Brownwood. It would not be reasonable to expect the Bank with only one location in a rural area approximately 20 miles from the City of Brownwood to serve all of Brown County.

Santa Anna AA

Table A - Demographic Information of the Assessment Area							
Assessment Area: Santa Anna AA							
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #	
Geographies (Census Tracts)	6	0.0	16.7	83.3	0.0	0.0	
Population by Geography	19,653	0.0	23.0	77.0	0.0	0.0	
Housing Units by Geography	11,509	0.0	22.7	77.3	0.0	0.0	
Owner-Occupied Units by Geography	5,631	0.0	20.5	79.5	0.0	0.0	
Occupied Rental Units by Geography	1,798	0.0	35.7	64.3	0.0	0.0	
Vacant Units by Geography	4,080	0.0	20.0	80.0	0.0	0.0	
Businesses by Geography	1,207	0.0	25.8	74.2	0.0	0.0	
Farms by Geography	124	0.0	12.1	87.9	0.0	0.0	
Family Distribution by Income Level	5,317	21.3	18.8	24.8	35.1	0.0	
Household Distribution by Income Level	7,429	24.6	17.8	19.7	37.8	0.0	
Median Family Income Non-MSAs - TX		\$52,076	Median Housing Value				\$76,307
			Median Gross Rent				\$599
			Families Below Poverty Level				10.4%
<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>							

LENDING TEST

The Bank's performance under the Lending Test in Texas is rated Outstanding.

Based on full-scope review, the Bank's lending performance in the state of Texas is excellent.

Primary weight for this conclusion is on the Bank's performance in the distressed middle-income tracts immediately surrounding the Bank's one physical location and on the distribution of loans by business size and income category of the borrower. Less weight is given to the Bank's performance in the one moderate-income tract in the AA because of its distance from the Bank's location and the proximity of competing institutions within that specific tract.

Distribution of Loans by Income Level of the Geography

Small Loans to Businesses

Refer to Table Q in the state of Texas section of 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.

In 2016, the Bank's lending to small businesses in the moderate-income CT exceeds the percent of businesses located in the moderate-income CT, but is significantly lower than the aggregate lending in the moderate-income CT. Because there are no low-income CTs in the AA, no analysis is performed for lending in low-income CTs.

In 2017 and 2018, the Bank's lending to small businesses in the moderate-income CT is lower than the percent of businesses located in the moderate-income CT and significantly lower than the aggregate lending in the CT. Again, because there are no low-income CTs in the AA, no analysis is performed for lending in low-income CTs.

Performance in the AA is excellent despite being lower than aggregate in the only moderate-income tract because the moderate-income tract represents the City of Coleman and the area is served by several larger institutions. Additionally, considering the Bank's strategy of serving the rural areas of Coleman and western Brown Counties it is reasonable that lending inside the City of Coleman is lower than that of the larger institutions that have a physical banking facility in the City of Coleman competing primarily for loans to businesses located in the less rural areas of the AA. As noted above, Santa Anna National Bank does not have a physical facility within the City of Coleman.

The Bank's performance in the designated distressed, middle-income tracts in Coleman County reflect a strong willingness to serve small businesses in the rural areas of the AA. The Bank made 311 of the total 993 loans reported made during the review period in the AA. Of the 311 loans the Bank made, 203 of them, or 65.2 percent, were made in the distressed, middle-income tracts. In comparison, the other institutions serving the AA made, in aggregate, 280 loans, or 28 percent of the aggregate 993 loans, in the distressed, middle-income tracts.

Consumer Loans

Refer to Table U in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the Bank's consumer loan originations and purchases.

In 2016, the Bank's lending to consumers living in the moderate-income CT exceeded the percent of households in the moderate-income tract. In 2017 and 2018, the Bank's lending to consumers living in the moderate-income CT is near to the percent of households in the moderate-income tract. Because there are no low-income CTs in the AA, no analysis is performed for lending in low-income CTs.

Performance in the AA is excellent despite being near to the percent of households in the moderate-income tract in 2017 and 2018 because, as stated previously, the only moderate-income tract in the AA represents the City of Coleman where other, larger institutions dominate the market.

The Bank's performance in the distressed, middle-income tracts in Coleman County reflect a strong willingness to serve individuals in the rural areas of the AA. For 2016, we sampled 34 consumer loans in the AA and 15, or 44 percent, were to individuals in the distressed, middle-income tracts. In 2017 and 2018, we sampled 270 consumer loans in the AA and 141, or 52 percent, were to individuals in the distressed, middle-income tracts.

Distribution of Loans by Income Level of the Borrower

The Bank exhibits excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the Bank.

Small Loans to Businesses

Refer to Table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the Bank's originations and purchases of loans to small businesses. Performance in the AA is excellent.

In 2016, all of the small business loans we reviewed were made to businesses with revenue less than \$1 million. This exceeds the percent of businesses identified as having revenues less than \$1 million and the aggregate lending to small businesses.

In 2017 and 2018, the Bank's lending to businesses with revenue less than \$1 million exceeded the percent of businesses identified as having revenues less than \$1 million and exceeded the aggregate lending to small businesses.

Using loan amounts as a proxy for business size demonstrates the Bank's strong willingness to serve the small businesses in the AA. Community contacts reveal that many of the small businesses in the AA are very small businesses operated by sole proprietors who operate several different small businesses. Because these businesses are so small, they often require financing in very small amounts that are not typically offered by larger institutions. Our sample included loan amounts ranging from \$400 to \$970 thousand with an average loan amount of \$34,567.

In 2016, 40.6 percent of the small business loans we reviewed were less than \$10 thousand, 43.5 percent were between \$10 thousand and \$50 thousand, and 8.7 percent were between \$50 thousand and \$100 thousand. In 2017 and 2018, 40 percent of the small business loans we reviewed were less than \$10 thousand, 48 percent were less than \$50 thousand, and 7.9 percent were less than \$100 thousand. Overall, 95.27 percent of the small business loans we reviewed were less than \$100 thousand.

Consumer Loans

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 bank's consumer loan originations and purchases. Performance in the AA is excellent.

In 2016, the Bank's lending to low-income borrowers is lower than the percent of households identified as low-income, but lending to moderate-income borrowers is significantly higher than the percent of households identified as moderate-income.

In 2017 and 2018, the Bank's lending to low-income borrowers exceeds the percent of households identified as low-income. Lending to moderate-income borrowers also exceeds the percent of households identified as moderate-income.

The size of the loans in our sample further demonstrates the Bank's willingness to serve low-income borrowers in the rural areas of the AA by providing very small consumer loans not typically offered by

larger institutions. Our sample included loan amounts ranging from \$250 to \$55 thousand with an average loan amount of \$7,300. Of the loans reviewed, 56.58 percent were less than \$5 thousand and another 19.5 percent were less than \$10 thousand.

COMMUNITY DEVELOPMENT

Community Development lending, investments, donations and services had a significantly positive effect on the overall rating.

During the assessment period, the Bank made \$824 thousand in community development loans. These loans resulted in at least 26 new jobs in the AA and six affordable housing units. Significant loans included a \$308 thousand loan to the Santa Anna ISD to provide six affordable housing units for teachers in the district and a \$75 thousand loan to a local business that provided 12 new jobs in the AA.

During the assessment period, bank employees and directors provided 558 hours of volunteer time to qualifying organizations. Volunteer hours included teaching financial literacy classes at the local high school and serving in board positions for local non-profit entities providing community development services in the community. The Bank donated \$1,500 to a non-profit organization providing before and after school programs for low- and moderate-income families in the AA.

Responses to Complaints

The bank did not receive any complaints during the 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 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:	01/10/2016 to 12/31/2018	
Bank Products Reviewed:	Small Business and Consumer Loans At the bank’s option - Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
No affiliates		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Texas		
Santa Anna AA	Full Scope	The AA includes a total of six whole, contiguous CTs. All three whole CTs in Coleman County and three CTs making up the western portion of Brown County.

Appendix B: Summary of MMSA and State Ratings

RATINGS	The Santa Anna National Bank
Overall Bank:	Lending Test Rating
The Santa Anna Bank	Outstanding
MMSA or State:	
Texas	Outstanding

Appendix C: 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/assessment area.

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. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts 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 LMI 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 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 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), 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 census tract 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/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. 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: 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.

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 metropolitan statistical 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 statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, 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 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/assessment area. Deposit data are compiled by the FDIC 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 assessment area.
- 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 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 Bank 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 Bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

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
Santa Anna AA	80	2,810	100.0	501	0.0	0.0	0.0	27.2	28.99	51.1	72.8	71.8	48.9	0.0	0.0	0.0	0.0	0.0	0.0
Total	80	2,810	100.0	501	0.0	0.0	0.0	27.2	28.99	51.1	72.8	71.8	48.9	0.0	0.0	0.0	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
Santa Anna AA	231	6,416	100	492	0.0	0.0	0.0	26.6	18.18	51.0	73.4	81.82	49.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	231	6,416	100	492	0.0	0.0	0.0	26.6	18.18	51.0	73.4	81.82	49.0	0.0	0.0	0.0	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
Santa Anna AA	80	2,810	100.0	501	81.9	100.0	71.7	4.1	0.0	14.0	0.0
Total	80	2,810	100.0	501	81.9	100.0	71.7	4.1	0.0	14.0	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 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
Santa Anna AA	231	6,416	100	492	80.9	99.13	39.2	4.0	.87	15.2	0
Total	231	6,416	100	492	80.9	99.13	39.2	4.0	.87	15.2	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 U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2016

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Santa Anna AA	50	405	100	0.0	0.0	23.5	44.12	76.5	55.88	0.0	0.0	0.0	0.0

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography 2017-18

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Santa Anna AA	270	2,759	100	0.0	--	24.2	23.58	75.8	76.42	0.0	--	0.0	--

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2016

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Santa Anna AA	50	405	100.0	27.5	9.36	18.0	37.46	16.9	9.28	37.5	43.89	0.0	0.0
Total	50	405	100.0	27.5	9.36	18.0	37.46	16.9	9.28	37.5	43.89	0.0	0.0

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower 2017-18

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Santa Anna AA	270	2,759	100	24.6	25.84	17.8	26.85	19.7	14.09	37.8	23.66	0.0	.67
Total	270	2,759	100	24.6	25.84	17.8	26.85	19.7	14.09	37.8	23.66	0.0	.67

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