



**PUBLIC DISCLOSURE**

July 15, 2019

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

First National Bank of McGregor  
Charter Number 4076

401 South Main  
McGregor, TX 76657

Office of the Comptroller of the Currency  
225 E. John Carpenter Fwy, 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

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

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

**The Community Development test is rated: Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating is based on First National Bank McGregor's lending performance in the sole assessment area (AA), McLennan County, Texas. The lending performance is satisfactory given the bank's size, financial condition, and credit needs of the AA.
- The bank's loan-to-deposit ratio is more than reasonable given its size, financial condition and the credit needs of its AA.
- The bank originated a majority of loans inside the AA.
- The distribution of loans to individuals and businesses of different income levels reflects reasonable penetration.
- The geographic distribution of loans reflects reasonable dispersion throughout the AA.
- The Community Development (CD) Test rating is based on CD activities, including lending, investments, donations, and services. CD activities reflect adequate responsiveness to the needs of the bank's AA.

### Loan-to-Deposit Ratio

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

The quarterly bank-wide LTD ratio since the previous CRA performance evaluation (PE) averaged 98.93 percent. The LTD was determined by using quarterly averages for the previous 13 quarters from March 31, 2016 through March 31, 2019.

We compared the bank's LTD ratio to four similarly situated banks in their market area. The aggregate average LTD ratio for the competing banks was 87.01 percent, with a low average of 78.27 percent and a high average of 91.68 percent.

### Lending in Assessment Area

A majority of the bank's loans are inside its AAs. The bank originated and purchased 67.5 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. The bank does not have any credit extended by affiliates that may be considered under the other performance criteria.

First National Bank of McGregor lending in the AA is reasonable and meets the standard for satisfactory performance. The majority of the bank's loans were made within the bank's delineated AA, both by number and dollar volume. The bank originated or purchased 67.5 percent of the number of loans and 52.10 percent of the dollar volume of loans in the AA. See Table D for details.

<b>Table D - Lending Inside and Outside of the Assessment Area</b>										
<b>Loan Category</b>	<b>Number of Loans</b>				<b>Total #</b>	<b>Dollar Amount of Loans \$(000s)</b>				<b>Total \$(000s)</b>
	<b>Inside</b>		<b>Outside</b>			<b>Inside</b>		<b>Outside</b>		
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>		<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	
Home Mortgage										
2016	149	74.5	51	25.5	200	17,350	75.6	5,611	24.4	22,961
2017	164	71.9	64	28.1	228	22,314	66.9	11,062	33.1	33,376
2018	176	55.7	140	44.3	316	24,083	43.5	31,335	56.5	55,418
<b>Subtotal</b>	<b>489</b>	<b>65.7</b>	<b>255</b>	<b>34.3</b>	<b>744</b>	<b>63,747</b>	<b>57.0</b>	<b>48,008</b>	<b>43.0</b>	<b>111,755</b>
Small Business										
2016	108	68.79	49	31.21	157	19,136	53.98	16,314	46.02	35,451
2017	146	65.37	77	34.53	223	23,647	42.49	32,008	57.51	55,656
2018	229	72.24	88	27.76	317	32,448	50.29	32,071	49.71	64,520
<b>Subtotal</b>	<b>483</b>	<b>69.40</b>	<b>213</b>	<b>30.60</b>	<b>696</b>	<b>75,232</b>	<b>48.54</b>	<b>79,730</b>	<b>51.45</b>	<b>154,963</b>
<b>Total</b>	<b>972</b>	<b>67.45</b>	<b>468</b>	<b>32.55</b>	<b>1440</b>	<b>138,979</b>	<b>52.10</b>	<b>127,738</b>	<b>47.89</b>	<b>266,718</b>

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

The information noted in Table D was calculated using the entire population of loans originated and purchased during the evaluation period.

## Description of Institution

First National Bank of McGregor (FNBM or the bank) is a \$487 million rural community bank, headquartered in McGregor, Texas. As of June 30, 2019, FNBM had net loans of \$420 million, or 86 percent of total assets. FNBM is a single-state institution with the main bank facility located in downtown McGregor, Texas. FNBM is wholly-owned by McGregor Bancshares, Inc., also located in McGregor, Texas.

The bank has one rating area, the State of Texas, with one assessment area which consists of all of McLennan County, Texas. The bank operates three branches within its AA. The Downtown main branch, and the South Bosque branch are located in McGregor, Texas, and the Triangle Tower branch is located in Waco, Texas.

In February 2017, the bank sold the Oglesby, Texas branch which is the only branch closing during the current review period and prior two calendar years. The bank opened the Triangle Tower branch in November 2017 and has future plans to open the 8<sup>th</sup> Street Location in Waco, Texas later in 2019.

FNBM's physical offices are its primary delivery system for traditional commercial and retail products and services. The main office and both branches each have drive-up facilities with extended hours and a 24-hour ATM. Saturday hours are offered at the drive-up facility and lobby of the McGregor branch that is known as the South Bosque McGregor location.

FNBM's banking programs and hours allow the bank to deliver needed banking and credit services to LMI areas and customers as well as small business owners, farmers, and livestock operators throughout the bank's AA. FNBM offers on-line banking through its web site, [www.tfnbt.com](http://www.tfnbt.com). Mobile banking allows access through a customer's phone. Telephone banking in English and Spanish is available. ATM services are available in English and Spanish. Each bank location has employees who speak Spanish. FNBM offers secured and unsecured small dollar personal loans to qualified customers. The bank also offers start-up and working capital loans for small businesses. Business loans are also offered through the Small Business Administration lending programs.

As of June 30, 2019, total assets were \$487 million, tier 1 capital was 57 million and the tier 1 leverage ratio was 12.4 percent. As mentioned, the loan portfolio totals \$420 million with \$351 million, or 83.5 percent in real estate loans, \$51 million or 12.1 percent in commercial and industrial loans, and \$17 million or 4 percent in loans to individuals.

The bank was rated "satisfactory" during the prior CRA evaluation dated as of June 13, 2016. There are no legal or financial impediments to FNBM's ability to meet the credit needs of the AA.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

FNBM is subject to the interagency Intermediate Small Bank (ISB) CRA evaluation procedures. As such, this PE assesses the bank's performance under the Lending and Community Development Tests. The evaluation period ranges from January 1, 2016, end date for the most recent CRA evaluation HMDA lending and CRA lending, through December 31, 2018, the date of the most recent full calendar year. We identified commercial loans (business loans), and residential real estate loans as the bank's

primary loan products. The Lending Test concentrated on lending activity from January 1, 2016 to December 31, 2018. In our evaluation of the distribution of loans, we utilized the demographics and geographies related to the 2010 Census as it applies to the years 2016, 2017, and 2018.

In addition to the Lending Test, ISBs are evaluated under the Community Development Test. Our consideration of CD activity including loans, investments and services, extended from June 14, 2016 to December 31, 2018.

At the start of the examination, we identified the primary loan products, based on the data available from the March 31, 2019 Call Report, as 1-4 family residential loans, commercial real estate loans, and commercial and industrial loans. Please see the following table for details.

<b>First National Bank of McGregor Loan Portfolio Summary</b>		
<b>Loan Category</b>	<b>Dollar Volume (in thousands)</b>	<b>Percentage</b>
Commercial and Commercial Real Estate	180,190	44%
Residential Real Estate	167,274	40%
Construction	30,423	7%
Consumer and Other	19,207	5%
Agriculture and Livestock – Mortgage and Production	15,197	4%
Total Loans	413,072	100%

Source: March 31, 2019 Call Report

In evaluating the loan-to-deposit ratio, we used a comparison of four similarly situated banks over the prior 13 quarters. These banks were selected based on their proximity and similar size to FNBM.

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

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. Four 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.

The bank’s sole AA of McClennan County was selected for a full-scope review.

### **Ratings**

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings. Ratings for this CRA evaluation are based on the results of the full-scope review of the bank’s AA.

The bank’s AA consists of the entire county of McLennan County. McLennan County is located in Central Texas. Waco is its largest city and the county seat. Waco, approximately 90 miles south of Dallas/Fort Worth and 100 miles north of Austin, is centrally located on Interstate 35.

## **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 Texas: Satisfactory

**The Lending Test is rated:** Satisfactory

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

The major factors that support this rating include:

- The geographic distribution of loans reflects reasonable dispersion throughout the AA.
- The distribution of loans to individuals and businesses of different income levels is reasonable.
- CD activities, including lending, investments, donations, and services, reflect adequate responsiveness to the needs of the bank's AA.

### Description of Institution's Operations in Texas

FNBM has delineated McLennan County's fifty-one census tracts as the bank's AA. Seven of the fifty-one census tracts are designated low income, fifteen tracts are moderate-income, thirteen are middle-income, fourteen are upper-income and two are unknown. There are no census tracts designated as middle-income distressed or underserved in the AA. The city of Waco is the county seat of McLennan County. The bank's primary business focus is residential and commercial lending within the AA.

The city center of McGregor is located 17 miles southwest of Waco on U.S. Route 84. Over the last several years, McGregor has become more of a bedroom community to Waco with many of its residents commuting to Waco for employment. McGregor's population at the 2010 Census was 4,987. The city is home to one of the area's largest employers, SpaceX that operates a rocket engine development and test facility.

The county's 3.8 percent unemployment rate is slightly higher in comparison with the 3.4 percent and 3.7 percent unemployment rates for the State of Texas and the United States, respectively. Low-income households are higher than the percentage of moderate-income households in the AA, at 24.7 percent compared to 15.3 percent. Low-income individuals represent 13.7 percent of the AA compared to moderate-income at 19.6 percent.

The AA is a moderately competitive banking environment. According to the June 30, 2018 FDIC Deposit Market Share Report, 39 banks operate 72 branches within the AA. FNBM is ranked seventh overall holding 4.17 percent of the total market share.

A community contact interview was conducted at a recent CRA evaluation of a Waco bank. The contact was made to an economic development organization responsible for assisting the greater Waco region with job growth, enhancing quality of life, and attracting talent to the Waco workforce market. The contact indicated Waco and the McLennan County area continue to enjoy a stable and growing economy. Economic growth has been continuous since 2012 and is supported by a variety of industries.



Construction and development continues at a strong pace. The largest employers are Baylor University, Healthcare groups, L3 Communications (aerospace), retail (Walmart), and school districts. New businesses continue to move into the area and existing businesses are growing. The population continues to grow at about 1 to 2 percent annually. The area continues to court national companies to move into the area. The needs of the AA are affordable housing and small business loans.

FNBM has continued its Charity for Champions program. Charity for Champions works to raise awareness of local non-profit organizations that benefit low-income and moderate-income families, individuals, and areas. Many of the recipient organizations report increased donations of volunteer service and money resulting from the exposure provided by this innovative program. FNBM's program include some 501 C non-profit organizations that assist with temporary affordable housing and in the past included Waco Habitat for Humanity.

Please see the following tables for demographic information of the AA.

2016 McClennan County AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: McLennan County MSA 2016</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	51	13.7	19.6	31.4	31.4	3.9
Population by Geography	234,906	12.2	19.2	29.2	37.6	1.8
Housing Units by Geography	93,656	14.2	19.6	30.3	35.9	0.0
Owner-Occupied Units by Geography	49,856	5.5	15.0	30.0	49.5	0.0
Occupied Rental Units by Geography	33,142	24.3	25.9	30.0	19.7	0.0
Vacant Units by Geography	10,658	23.2	21.7	32.6	22.5	0.0
Businesses by Geography	14,301	5.1	21.6	31.0	41.7	0.6
Farms by Geography	589	1.5	8.5	35.3	54.3	0.3
Family Distribution by Income Level	55,570	22.1	17.3	19.5	41.1	0.0
Household Distribution by Income Level	82,998	24.7	15.3	17.0	43.0	0.0
Median Family Income MSA - 47380 Waco, TX MSA		\$50,689	Median Housing Value			\$100,223
			Median Gross Rent			\$742
			Families Below Poverty Level			14.1%

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.

FNBM has one AA in the state of Texas which meets the requirements of the regulation, and does not arbitrarily exclude low- and moderate-income geographies. The 2010 U.S. census data and 2016 Dun & Bradstreet data shows that there are fifty-one census tracts in McLennan County. Low-income census tracts comprise 13.7 percent of the AA, and moderate-income census tracts comprise 19.6 percent of the AA. The population of the county is nearly 235,000 people, with 12.2 percent located in low-income census tracts and 19.2 percent of the population located in moderate-income census tracts. Family distribution by income level shows 22.1 percent of families in the AA are considered low-income families and 17.3 percent of families are considered moderate-income families. The median family income for the MSA is \$50,689, and the median housing value is \$100,223. Median gross rent is \$742 per month. There are 14.1 percent of families that live below the poverty level. Please see Table A below for 2016 demographic information related to the McLennan County AA.

2017-2018 McLennan County AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: McLennan County MSA 2017-2018</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	51	13.7	29.4	25.5	27.5	3.9
Population by Geography	241,505	10.4	29.8	23.2	35.0	1.6
Housing Units by Geography	96,935	12.1	30.1	24.8	33.0	0.0
Owner-Occupied Units by Geography	50,850	4.5	22.1	26.9	46.4	0.0
Occupied Rental Units by Geography	35,919	20.7	40.9	20.5	17.9	0.0
Vacant Units by Geography	10,166	19.6	31.8	29.2	19.3	0.0
Businesses by Geography	14,997	5.1	30.9	25.3	38.1	0.6
Farms by Geography	596	2.0	13.4	36.6	47.8	0.2
Family Distribution by Income Level	57,860	22.5	17.7	18.0	41.8	0.0
Household Distribution by Income Level	86,769	25.3	16.0	15.6	43.1	0.0
Median Family Income MSA - 47380 Waco, TX MSA		\$54,026	Median Housing Value			\$112,021
			Median Gross Rent			\$780
			Families Below Poverty Level			14.7%
<p><i>Source: 2015 ACS Census and 2018 D&amp;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></p>						

2015 ACS census data and 2018 Dun & Bradstreet data shows fifty-one census tracts in McLennan County. During the census review, seven low-income census tracts equaling 13.7 percent, and fifteen moderate-income census tracts equaling 29.4 percent made up 43.1 percent of the AA. The population of the county is roughly 241,500 people, with 40 percent of the population located in low- and moderate-income census tracts. Family distribution by income level shows 22.5 percent of families in the AA are considered low-income families and 17.7 percent of families are considered moderate-income families. The median family income for the MSA is \$54,026, and the median housing value is \$112,021. Median gross rent is \$780 per month. There are 14.7 percent of families that live below the poverty level. Please see Table A below for the 2017 – 2018 demographic information for the McLennan County AA.

## **Scope of Evaluation in Texas**

The bank's sole AA of McClennan County, Texas received a full-scope review. Performance within the AA was assessed through the Lending Test and the Community Development Test. Please see the following conclusions for detail.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS**

### **LENDING TEST**

The bank's performance under the Lending Test in Texas is rated Satisfactory.

Based on a full-scope review of the McLennan County AA, the bank's lending performance in the state of Texas is reasonable.

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

The bank exhibits reasonable geographic distribution of loans in the state.

#### ***Home Mortgage Loans***

Refer to Table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

FNBM distribution of Home Mortgage Loans in the AA reflects reasonable penetration to low- and moderate-income geographies.

The bank's lending in 2016 to low-income and moderate-income geographies reflects poor penetration as the sampled loans are lower than the percentage of Owner Occupied Housing Units in the AA and are lower than, but near the percentage of peer aggregated in both low- and moderate-income census tracts within McLennan County AA. Mitigating factors include a higher volume of rental units with 24.3 percent and 25.9 percent of the low- and moderate-income census tracts designated as occupied rental units in 2016. Please see Table A which references the 2016 McLennan County Demographic Information.

FNBM lending in low- and moderate-income tracts in 2017 and 2018 is reasonable. While the bank did not exceed the percent of Owner Occupied Housing Units, the bank did exceed the aggregated percent in low-income tracts and was only slightly lower in moderate-income tracts.

### ***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.

FNBM distribution of small business loans to by income category of different geographies in the AA reflects reasonable penetration.

In 2016, while the sample identified no small business loans in low-income census tracts, the bank's distribution percentage of loans in moderate-income census tracts is excellent. The bank's percentage of loans in moderate-income census tracts exceeded the percentage of small businesses in those geographies as well as exceeded the distribution of loans of its aggregate comparators. In 2017 and 2018, the bank's distribution percentage of loans in low-income census tracts is reasonable and moderate-income census tracts is poor in comparison to the percent of business and aggregate comparators inside the AA.

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

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

### ***Home Mortgage Loans***

Refer to Table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans in the AA is reasonable given the performance context. While the bank's percentage of home mortgage loans in 2016 to low- and moderate-income borrowers was below the percentage of low- and moderate-income families in the AA, the percentage of bank loans was above the aggregate lending for low- and moderate-income families. For 2017-2018, the bank's percentage of loans was below the percentage of low- and moderate-income families in the AA and below, but near the aggregate for moderate-income borrowers; however, the bank's percentage of loans was above the aggregate percentage for low-income borrowers.

Opportunities to lend to low- and moderate-income families in the AA are limited. The AA has a large percentage of rental housing. Additionally, due to lower income levels, many low- and moderate-income families have difficulty meeting the credit qualification standards to obtain a loan.

### ***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 small loans to businesses.

The distribution of loans to businesses of different sizes in the AA reflects excellent penetration of loans to businesses that are small. By number of loans made in 2016, the bank’s percentage of lending to AA small businesses is comparable to the percentage of reporting AA small businesses with gross annual revenues of less than \$1 million. The bank’s percentage of lending to AA small businesses also exceeded the aggregate distribution of loans to those businesses. For 2017-2018, the bank’s percentage of lending to AA small businesses was comparable to the percentage of reporting AA small businesses and exceeded the aggregate distribution of loans to AA small businesses.

***Responses to Complaints***

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

**COMMUNITY DEVELOPMENT TEST**

The bank’s performance under the Community Development Test in the state of Texas is rated Satisfactory.

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the AA through community development loans, qualified investments, and community development services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s AA.

**Number and Amount of Community Development Loans**

Refer to the Lending Activity tables below for the facts and data used to evaluate the bank’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The level of CD lending reflects an adequate responsiveness to CD needs in the AA.

The bank originated nine CD loans totaling \$10.5 million during the evaluation period or 18.41 percent of tier 1 capital. The bank’s level of CD lending demonstrates adequate responsiveness to the needs of its AA. Key lending in the AA included loans to primarily promote economic development, community service operations, and revitalization and stabilization projects.

Significant loans include approximately \$6.3 million in business development loans to a local company to build a restaurant and retail center that will create new jobs as well as 1.9 million in business development to build a strip mall center which will also create jobs for LMI individuals.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
McLennan AA	10	100.0	10,500	100.0

**Number and Amount of Qualified Investments**

The level of qualified investments in the McLennan AA reflects an adequate responsiveness to the CD needs of the AA.

The bank made 64 qualifying donations totaling \$130,500 thousand during the evaluation period. Following are examples of how the donations made a positive impact on the AA:

- \$38,800 in cash donations to the McGregor ISD. The McGregor ISD Education Foundation is dedicated to providing resources to enrich the educational opportunities available to all McGregor ISD students.
- \$12,000 to the Generation Adoption of Waco Generations Adoptions is a non-profit, 501(c)(3) adoption agency licensed by the state of Texas to provide adoption services.
- \$8,000 to Caritas of Waco which is a non-profit charity organization which provides food, clothing, household items to local individuals. The Caritas in Waco is located in a LMI geographical area.
- \$7,800 to CASA of McLennan a 501(c)3 nonprofit organization governed by a volunteer board of directors, and a member of the National and Texas CASA Associations. CASA is Court appointed special advocate for children during the foster care process.
- \$6,300 to The Family Health Center has 15 remote clinics spread throughout the McLennan County area to provide the best quality healthcare services to the vulnerable population of the community (LMI individuals).

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

The level of CD services in the McLennan AA reflects an adequate responsiveness to CD needs.

The level of CD services in the McLennan AA reflects an adequate responsiveness to the CD needs of the AA. During the evaluation period FNBM provided 355 hours of community service to 10 CD organizations within the AA. These hours were served by nine bank employees mostly in leadership roles for these organizations, either on the board, as treasurer, or as a committee member, with many serving on a continuing basis to the organizations.

CD service hours (in parentheses) are categorized below by CD criteria that either benefit LMI individuals, families, or geographies. Below are highlights of service hours and organizations services were provided to.

- United Way (59) – Reviewing applications/grants proposals from Non-Profit organizations to assess their mission.
- Leadership Waco (40) – An employee participated in leadership Waco which is sponsored by the Waco Chamber of Commerce.
- McGregor Chamber of Commerce (36) – An employee is a committee member of the McGregor Chamber of Commerce.
- Family Health Center (36) – An employee is a Board Member.
- Nightlight Adoptions (36) – An employee is a Board Member.

## 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 MSA(s) and non-MSA(s) 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 to 12/31/2018	
<b>Bank Products Reviewed:</b>	Home mortgage loans and small business loans. CD loans, qualified investments and donations, and CD services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A		
<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>
MMSA(s)		
<b>Texas</b>		
McLennan County	Full-scope	The entire county of McLennan County is the bank’s assessment area.

## Appendix B: Summary of MMSA and State Ratings

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RATINGS First National Bank of McGregor			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
FNBM	Satisfactory	Satisfactory	Satisfactory
Texas	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.



## 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, 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

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### 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 30<sup>th</sup> of each year. Tables without data are not included in this PE. *[Note: Do not re-letter the tables.]*

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 bank 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 bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. 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 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 S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- 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 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table 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 O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
McLennan County MSA 2016	149	17,350	100.0	6,051	5.5	2.7	3.5	15.0	8.1	9.1	30.0	25.5	22.8	49.5	63.8	64.6	0.0	0.0	0.0
<b>Total</b>	<b>149</b>	<b>17,350</b>	<b>100.0</b>	<b>6,051</b>	<b>5.5</b>	<b>2.7</b>	<b>3.5</b>	<b>15.0</b>	<b>8.1</b>	<b>9.1</b>	<b>30.0</b>	<b>25.5</b>	<b>22.8</b>	<b>49.5</b>	<b>63.8</b>	<b>64.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.

Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
McLennan County MSA 2017	340	46,397	100.0	6,152	4.5	4.4	4.2	22.1	15.3	15.4	26.9	19.7	21.3	46.4	60.6	59.1	0.0	0.0	0.0
<b>Total</b>	<b>340</b>	<b>46,397</b>	<b>100.0</b>	<b>6,152</b>	<b>4.5</b>	<b>4.4</b>	<b>4.2</b>	<b>22.1</b>	<b>15.3</b>	<b>15.4</b>	<b>26.9</b>	<b>19.7</b>	<b>21.3</b>	<b>46.4</b>	<b>60.6</b>	<b>59.1</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2016</b>
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
McLennan County MSA 2016	149	17,350	100.0	6,051	22.1	5.4	1.9	17.3	16.1	7.5	19.5	18.1	16.0	41.1	53.7	52.9	0.0	6.7	21.7
<b>Total</b>	<b>149</b>	<b>17,350</b>	<b>100.0</b>	<b>6,051</b>	<b>22.1</b>	<b>5.4</b>	<b>1.9</b>	<b>17.3</b>	<b>16.1</b>	<b>7.5</b>	<b>19.5</b>	<b>18.1</b>	<b>16.0</b>	<b>41.1</b>	<b>53.7</b>	<b>52.9</b>	<b>0.0</b>	<b>6.7</b>	<b>21.7</b>

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

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017-18</b>
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
McLennan County MSA 2017	340	46,397	100.0	6,152	22.5	5.9	2.9	17.7	9.4	10.2	18.0	17.4	19.8	41.8	53.2	48.0	0.0	14.1	19.1
<b>Total</b>	<b>340</b>	<b>46,397</b>	<b>100.0</b>	<b>6,152</b>	<b>22.5</b>	<b>5.9</b>	<b>2.9</b>	<b>17.7</b>	<b>9.4</b>	<b>10.2</b>	<b>18.0</b>	<b>17.4</b>	<b>19.8</b>	<b>41.8</b>	<b>53.2</b>	<b>48.0</b>	<b>0.0</b>	<b>14.1</b>	<b>19.1</b>

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



<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2016</b>
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
McLennan County MSA 2016	21	1,366	100	3,123	5.1	0.0	5.1	21.6	42.8	17.6	31.0	9.52	30.1	36.6	47.62	46.8	0.6	0.0	0.3
<b>Total</b>	<b>21</b>	<b>1,366</b>	<b>100</b>	<b>3,123</b>	<b>5.1</b>	<b>0.0</b>	<b>5.1</b>	<b>21.6</b>	<b>42.8</b>	<b>17.6</b>	<b>31.0</b>	<b>9.52</b>	<b>30.1</b>	<b>36.6</b>	<b>47.62</b>	<b>46.8</b>	<b>0.6</b>	<b>0.0</b>	<b>0.3</b>

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

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2017-18</b>
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
McLennan County MSA 2017-2018	26	2,071	100	3,280	5.1	3.8	5.2	30.9	19.2	28.7	25.3	23	26.1	38.1	53.8	39.7	0.6	0.0	0.5
<b>Total</b>	<b>26</b>	<b>2,071</b>	<b>100</b>	<b>3,280</b>	<b>5.1</b>	<b>3.8</b>	<b>5.2</b>	<b>30.9</b>	<b>19.2</b>	<b>28.7</b>	<b>25.3</b>	<b>23</b>	<b>26.1</b>	<b>38.1</b>	<b>53.8</b>	<b>39.7</b>	<b>0.6</b>	<b>0.0</b>	<b>0.5</b>

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

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2016</b>
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	
McLennan County MSA 2016	21	1,366	100	3,123	81.4	71.43	38.5	5.8	28.57	12.8	0.0	
<b>Total</b>	<b>21</b>	<b>1,366</b>	<b>100</b>	<b>3,123</b>	<b>81.4</b>	<b>71.43</b>	<b>38.5</b>	<b>5.8</b>	<b>28.57</b>	<b>12.8</b>	<b>0.0</b>	
<i>Source: 2016 D&amp;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</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2017-2018</b>
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	
McLennan County MSA 2017-2018	26	2,071	100	3,280	81.4	80.8	40.1	5.9	19.2	12.7	0.0	
<b>Total</b>	<b>26</b>	<b>2,071</b>	<b>100</b>	<b>3,280</b>	<b>81.4</b>	<b>80.8</b>	<b>40.1</b>	<b>5.9</b>	<b>19.2</b>	<b>12.7</b>	<b>0.0</b>	
<i>Source: 2018 D&amp;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</i>												