



## **PUBLIC DISCLOSURE**

April 22, 2019

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Commercial National Bank of Texarkana  
Charter Number 15257

5515 Summerhill Road  
Texarkana, TX 75505

Office of the Comptroller of the Currency  
1401 West Capitol  
Little Rock, AR 72201

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

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**Overall CRA Rating: This institution is rated Satisfactory.**

**The Lending Test is rated: Satisfactory**

The major factors that support this rating include:

- Commercial National Bank (CNB) has a reasonable loan to deposit (LTD) ratio.
- A substantial majority of CNB's primary loan products originated within the bank's assessment area (AA).
- CNB's overall borrower distribution for loans within the AA reflects reasonable penetration among individuals of different income levels and businesses of different sizes.
- CNB's overall geographic distribution for loans in the AA reflects reasonable dispersion throughout the AA.
- CNB has not received any CRA-related complaints since the last CRA performance evaluation (PE).

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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

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

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

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

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include

non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

**Full Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

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

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

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

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

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

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

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

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

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

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

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

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

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

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

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans

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

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

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

## **Description of Institution**

CNB is 100 percent owned by Commercial Bancshares, a one-bank holding company located in Texarkana, AR. CNB has six branches, one full-service banking facility in Bowie County, Texas, (Summerhill Road) and five full-service branches in Miller County, Arkansas, (Downtown, State Line, 82 East, Fouke, and Arkansas Boulevard). All facilities are equipped with either drive-up or walk-up cash-dispensing ATMs. As of May 20, 2019, CNB relocated the North State Line Branch to 4601 West 7<sup>th</sup> Street in Texarkana, Arkansas.

The bank's lending focuses primarily in 1-4 family owner occupied residential and small business loans.

CNB does not have any legal or financial impediments that would limit its ability to meet the credit needs within the AAs. As of December 31, 2018, the bank reported total assets of \$206.3 million with \$184 million in core deposits and \$126.05 million in net loans (61.09 percent of total assets). CNB's prior CRA examination was performed as of June 30, 2013, and was rated Outstanding.

## **Description of the Assessment Area**

### **Texarkana, AR-TX Metropolitan Statistical Area**

CNB's AA consists of the Texarkana, AR-TX MSA #45500. The AA includes all of Bowie County, TX and Miller County, AR. The 2015 American Community Survey census shows 30 CTs in the AA, including one low-income, eight moderate-income, 17 middle-income, and four upper-income CTs. One CT (9800) in the AA has an unknown income level due to having a very low population and consisting primarily of the Texarkana Regional Airport. The Texarkana, AR-TX MSA AA includes only whole CTs and does not arbitrarily exclude any low- or moderate-income areas; delineation is in conformance with the Community Reinvestment Act.

Financial services providers in the AA are highly competitive, with numerous banks and credit unions operating 54 banking offices in Bowie County, TX and Miller County, AR. As demonstrated by the chart on the next page, CNB's primary focus is providing services within its AA, which allows the bank to remain competitive with larger regional and national institutions. The market consists of 23 financial institutions with 54 offices. CNB holds 11.11 percent of the AA market share in deposits. Competition includes Regions Bank, Wells Fargo, Bancorp South, Farmers Bank and Trust, State Bank of De Kalb, and Bank of Ozarks.



| <b>Financial Institution</b>                 | <b>Market Share (%)</b> | <b>Total Deposits (\$) (000's)</b> |
|--|-------------------------|------------------------------------|
| Bancorp South                                | 11.11                   | \$226,348                          |
| <b>Commercial National Bank of Texarkana</b> | <b>11.11</b>            | <b>\$193, 623</b>                  |
| Wells Fargo                                  | 9.26                    | \$666,019                          |
| Farmer's Bank and Trust                      | 9.26                    | \$337,663                          |
| Regions Bank                                 | 7.41                    | \$201,883                          |
| State Bank of De Kalb                        | 7.41                    | \$133,954                          |

Overall, economic conditions in Texarkana are generally favorable with modest population growth and controlled unemployment. The local economy primarily centers in defense, healthcare, and industrial occupations. Major employers within the Texarkana, AR-TX MSA include Red River Army Depot, Cooper Tire & Rubber, two area hospitals, and two paper companies. Based on the Bureau of Labor Statistics reporting, the Texarkana, AR-TX MSA had an unemployment rate of 5.1 percent as of February 2019.

A community contact interview was conducted to help identify possible needs within the community. The contact was from the Housing Authority of De Kalb. The contact provides housing for elderly, disabled, and low-income families. The contact indicated that economic conditions in the area have declined. Several retail businesses that provide key resources have closed. The key needs identified by the contact were affordable housing, home improvement loans, and small business loans.

## **Scope of the Evaluation**

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

CNB was examined using the small bank CRA examination procedures. The evaluation period for this CRA Performance Evaluation was January 1, 2017, to December 31, 2018. Loan products used to assess the bank's performance under the Lending Test include residential real estate and small business loans.

### **Data Integrity**

The bank's internal auditors review the adequacy of HMDA data reporting annually. The most recent review, dated December 2018, indicates HMDA data for 2017 and 2018 are accurate. A HMDA Data Integrity Exam was conducted in 2018 with the HMDA LAR deemed reliable.

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

CNB has only one AA, which is the Texarkana, AR-TX MSA #45500: Bowie County, TX and Miller County, AR. Therefore, this AA will be treated as a full scope review.

## **Discriminatory or Other Illegal Credit Practices Review**

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

The OCC has not identified that this 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.

## Conclusions with Respect to Performance Tests

### Lending Test

#### Loan to Deposit Ratio

CNB's average LTD ratio at 59.63 percent is reasonable. The LTD ratio was derived using a 26-quarter average. Although the LTD ratio is less than the bank's peer group, CNB's practice is to maintain a strong liquidity position. For purposes of this analysis, one similarly situated bank with comparable asset size was reviewed for comparison to CNB's performance. The bank included was the State Bank of De Kalb in DeKalb, TX.

| Financial Institution                            | Total Assets<br>(000s) | Average LTD<br>(%) |
|--|------------------------|--------------------|
| State Bank of De Kalb                            | \$ 251,351             | 101.59             |
| <b>Commercial National Bank<br/>of Texarkana</b> | <b>\$ 193,177</b>      | <b>59.63</b>       |

We also considered other lending activities in our assessment of the LTD ratio. This includes three CD loans to two non-profit organizations renewed during the evaluation period. These three loans total \$362 thousand and represent 1.78 percent of total capital as of March 31, 2019. Both non-profit organizations provide essential services primarily to low- and moderate-income individuals and families within the bank's AA.

#### Lending in Assessment Area

| Table 1 - Lending in Texarkana, AR-TX MSA #45500 AA |                 |             |           |             |            |                  |             |              |             |               |
|---|-----------------|-------------|-----------|-------------|------------|------------------|-------------|--------------|-------------|---------------|
| Loan Type   | Number of Loans |             |           |             |            | Dollars of Loans |             |              |             |               |
|   | Inside          |             | Outside   |             | Total      | Inside           |             | Outside      |             | Total         |
|   | #               | %           | #         | %           | #          | \$               | %           | \$           | %           | \$            |
| Home Mortgage Loans                                 | 81              | 81.9        | 18        | 18.2        | 99         | 8,315            | 64.8        | 4,524        | 35.2        | 12,839        |
| Small Business Loans                                | 40              | 100.0       | 0         | 0           | 40         | 22,712           | 100.0       | 0            | 0           | 22,712        |
| <b>Total Loans</b>                                  | <b>121</b>      | <b>87.1</b> | <b>18</b> | <b>12.9</b> | <b>139</b> | <b>31,027</b>    | <b>87.3</b> | <b>4,524</b> | <b>12.7</b> | <b>35,551</b> |

Source: Loan sample and 2017 – 2018 HMDA data.

Based on the data in the above table, CNB's performance for lending within the AA exceeds the standard for satisfactory performance. A substantial majority of loans, 87.1 percent of total loans reviewed and 87.3 percent of the dollar volume of loans reviewed, originated by CNB are located inside the AA. We evaluated all HMDA loans and a sample of small business loans from 2017-2018 to determine the lending in the AA. A substantial majority, 81.9 percent of the number reviewed and 64.8 percent of the dollar volume reviewed, of home mortgage loans originated inside the AA. All small business loans in our sample originated within the AA. Furthermore, the

bank renewed three qualified CD loans to non-profits headquartered in the AA during the evaluation period.

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

The distribution of loans to borrowers of different income levels for residential mortgage lending and businesses of different sizes exhibits a reasonable distribution and meets the standard for satisfactory performance.

### **Home Mortgage Lending**

The distribution of home mortgage loans in 2017 is reasonable. Based on data in table P, appendix C, for 2017, the bank's percent of mortgage loans to low-income borrowers is somewhat lower than the percentage of low-income families in the AA. However, the bank's proportion of loans to low-income borrowers is stronger than the aggregate percentage of loans to low-income borrowers in the geographies. The percentage of mortgage loans to moderate-income borrowers was lower than the percentage of moderate-income families in the AA, and the bank's proportion of loans to moderate-income borrowers was weaker than aggregate. Home mortgage data included 17.1 percent of the bank's loans to not available-income borrowers.

The distribution of home mortgage loans in 2018 is reasonable. Based on data in table P, appendix C, for 2018, the bank's percent of mortgage loans to low-income borrowers is lower than the percentage of low-income families in the AA. However, the bank's portion of loans to low-income borrowers is stronger than the aggregate percentage of these loans in the geographies. The percentage of mortgage loans to moderate-income borrowers is lower than the percentage of moderate-income families in the AA, and the bank's proportion of loans to moderate-income borrowers is weaker than the aggregate. The home mortgage data included 15.0 percent of the bank's loans to not available-income borrowers.

### **Loans to Small Businesses**

The distribution of loans to small businesses is excellent for 2017 and 2018. Based on data in table R, appendix C, for both 2017 and 2018, the percentage of loans by number to small businesses with revenues less than \$1 million exceeds the percentage of small businesses with revenues less than \$1 million in the AA. The bank's portion of loans to small businesses with revenues less than \$1 million is significantly stronger than the aggregate level of lending to these entities for the geographies in both 2017 and 2018.

## **Geographic Distribution of Loans**

The geographic distribution of home mortgage and loans to small businesses within the AA exhibits reasonable dispersion and meets the standard for satisfactory performance.

### **Home Mortgage Lending**

The geographic distribution of home mortgage loans is excellent in 2017. Based on table O in appendix C, for 2017, the percentage of home mortgage loans originated in both low- and moderate-income tracts is greater than the percentage of owner-occupied housing units in these geographies. In addition, the percentage of home mortgage loans originated to borrowers in both

low- and moderate-income tracts exceeded the aggregate level of lending within these geographies.

The geographic distribution of home mortgage loans is reasonable in 2018. Based on table O in appendix C, for 2018, the percentage of total home mortgage loans originated to borrowers in low-income tracts is poor in 2018 compared to the percentage of owner-occupied housing units. The lack of owner occupied housing units and very low level of aggregate lending within the low-income geographies mitigates the bank's poor performance. Owner occupied housing units represent only 0.9 percent and aggregate lending is 0.2 percent within these tracts. The percentage of total home mortgage loans originated to borrowers in moderate-income tracts exceeds the percentage of owner occupied housing units in these geographies for 2018 and is excellent. Performance is also stronger than the aggregate level of lending in moderate-income tracts.

### **Loans to Small Businesses**

The geographic distribution of loans to small businesses is reasonable for 2017 and 2018. Based on table Q in appendix C, for 2017 and 2018, the percentage of loans originated to small businesses in low-income tracts is poor compared to the percentage of business and aggregate level of lending in the geographies. The nominal percentage of small businesses in the low-income tracts mitigates the bank's poor performance. The bank's percentage of small business loans originated to borrowers in moderate-income tracts in 2017 is near the percentage of small businesses in these geographies and exceeds the aggregate level of lending to small businesses in moderate-income tracts. 2018 performance in moderate-income tracts exceeds both demographic and aggregate comparators.

### **Responses to Complaints**

CNB has not had any complaints made relating to the CRA since the prior examination dated September 19, 2013.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities reviewed, and loan products considered. The table also reflects the metropolitan and nonmetropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

|   |   |   |
|---|---|---|
| <b>Time Period Reviewed</b>                             | Lending Test (01/01/2017 to 12/31/2018) |   |
| <b>Financial Institution</b>                            |   | <b>Products Reviewed</b>  |
| Commercial National Bank                                |   | Home Mortgages (Purchase, Refinance, and Improvement)<br>Small Business Loans |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b>           | <b>Products Reviewed</b>  |
| N/A   | N/A                                     | N/A   |
| <b>List of Assessment Areas and Type of Examination</b> |   |   |
| <b>Assessment Area</b>                                  | <b>Type of Exam</b>                     | <b>Other Information</b>  |
| Texarkana, AR-TX MSA                                    | Full Scope                              | Includes: Bowie County & Miller County  |

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

| Table A – Demographic Information of the Assessment Area   |         |               |                              |                  |                 |               |
|--|---------|---------------|------------------------------|------------------|-----------------|---------------|
| Assessment Area: Miller County AR and Bowie County TX AA 2018  |         |               |                              |                  |                 |               |
| Demographic Characteristics  | #       | Low<br>% of # | Moderate<br>% of #           | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)  | 30      | 3.3           | 30.0                         | 46.7             | 16.7            | 3.3           |
| Population by Geography  | 136,807 | 1.5           | 21.5                         | 53.6             | 23.3            | 0.0           |
| Housing Units by Geography   | 58,383  | 1.6           | 22.6                         | 54.2             | 21.6            | 0.0           |
| Owner-Occupied Units by Geography  | 32,975  | 0.9           | 14.7                         | 57.4             | 27.0            | 0.0           |
| Occupied Rental Units by Geography   | 17,408  | 3.2           | 35.2                         | 47.8             | 13.7            | 0.0           |
| Vacant Units by Geography  | 8,000   | 1.1           | 27.3                         | 54.8             | 16.8            | 0.0           |
| Businesses by Geography  | 8,076   | 0.9           | 26.7                         | 48.5             | 23.7            | 0.2           |
| Farms by Geography   | 281     | 0.0           | 11.0                         | 61.9             | 27.0            | 0.0           |
| Family Distribution by Income Level  | 34,302  | 22.5          | 16.2                         | 19.2             | 42.1            | 0.0           |
| Household Distribution by Income Level   | 50,383  | 25.1          | 15.4                         | 16.9             | 42.5            | 0.0           |
| Median Family Income MSA - 45500<br>Texarkana, TX-AR MSA   |         | \$51,151      | Median Housing Value         |                  |                 | \$100,557     |
|  |         |               | Median Gross Rent            |                  |                 | \$711         |
|  |         |               | Families Below Poverty Level |                  |                 | 16.4%         |
| <p>Source: 2015 ACS Census and 2018 Dunn &amp; Bradshaw (D&amp;B) Data<br/>           Due to rounding, totals may not equal 100.0<br/>           (*) The NA category consists of geographies that have not been assigned an income classification.</p> |         |               |                              |                  |                 |               |

## Appendix C: 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 areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Deposit data is compiled by the FDIC and is available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

**Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category 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 MA/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 originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data is not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

**Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** – Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan



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

**Table S. Assessment Area Distribution of Loans to Farms by Income Category of the 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. Because small farm data is 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 (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer 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 throughout 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 MA/assessment area.

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2017**

| 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  |
| Miller County AR and Bowie County TX AA 2017 | 41                        | 3,393        | 100.0        | 2,984          | 0.9                               | 2.4          | 0.2        | 14.7                              | 26.8         | 11.5        | 57.4                              | 41.5         | 54.4        | 27.0                              | 29.3         | 33.8        | 0.0                               | 0.0          | 0.1        |
| <b>Total</b>                                 | <b>41</b>                 | <b>3,393</b> | <b>100.0</b> | <b>2,984</b>   | <b>0.9</b>                        | <b>2.4</b>   | <b>0.2</b> | <b>14.7</b>                       | <b>26.8</b>  | <b>11.5</b> | <b>57.4</b>                       | <b>41.5</b>  | <b>54.4</b> | <b>27.0</b>                       | <b>29.3</b>  | <b>33.8</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.1</b> |

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

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2018**

| 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  |
| Miller County AR and Bowie County TX AA 2018 | 40                        | 4,922        | 100.0        | 2,984          | 0.9                               | 0.0          | 0.2        | 14.7                              | 27.5         | 11.5        | 57.4                              | 37.5         | 54.4        | 27.0                              | 35.0         | 33.8        | 0.0                               | 0.0          | 0.1        |
| <b>Total</b>                                 | <b>40</b>                 | <b>4,922</b> | <b>100.0</b> | <b>2,984</b>   | <b>0.9</b>                        | <b>0.0</b>   | <b>0.2</b> | <b>14.7</b>                       | <b>27.5</b>  | <b>11.5</b> | <b>57.4</b>                       | <b>37.5</b>  | <b>54.4</b> | <b>27.0</b>                       | <b>35.0</b>  | <b>33.8</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.1</b> |

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

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower |                           |              |              |                |                      |              |            |                           |              |             |                         |              |             |                        |              |             |                                |              | 2017        |
|---|---------------------------|--------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| Assessment Area:  | Total Home Mortgage Loans |              |              |                | Low-Income Borrowers |              |            | Moderate-Income Borrowers |              |             | Middle-Income Borrowers |              |             | Upper-Income Borrowers |              |             | Not Available-Income Borrowers |              |             |
|   | #                         | \$           | % of Total   | Overall Market | % Families           | % Bank Loans | Aggregate  | % Families                | % Bank Loans | Aggregate   | % Families              | % Bank Loans | Aggregate   | % Families             | % Bank Loans | Aggregate   | % Families                     | % Bank Loans | Aggregate   |
| Miller County AR and Bowie County TX AA 2017  | 41                        | 3,393        | 100.0        | 2,984          | 22.5                 | 14.6         | 3.2        | 16.2                      | 7.3          | 10.6        | 19.2                    | 7.3          | 19.8        | 42.1                   | 53.7         | 45.8        | 0.0                            | 17.1         | 20.6        |
| <b>Total</b>  | <b>41</b>                 | <b>3,393</b> | <b>100.0</b> | <b>2,984</b>   | 22.5                 | 14.6         | <b>3.2</b> | 16.2                      | 7.3          | <b>10.6</b> | 19.2                    | 7.3          | <b>19.8</b> | 42.1                   | 53.7         | <b>45.8</b> | 0.0                            | 17.1         | <b>20.6</b> |

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

| Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower |                           |              |              |                |                      |              |            |                           |              |             |                         |              |             |                        |              |             |                                |              | 2018        |
|---|---------------------------|--------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|
| Assessment Area:  | Total Home Mortgage Loans |              |              |                | Low-Income Borrowers |              |            | Moderate-Income Borrowers |              |             | Middle-Income Borrowers |              |             | Upper-Income Borrowers |              |             | Not Available-Income Borrowers |              |             |
|   | #                         | \$           | % of Total   | Overall Market | % Families           | % Bank Loans | Aggregate  | % Families                | % Bank Loans | Aggregate   | % Families              | % Bank Loans | Aggregate   | % Families             | % Bank Loans | Aggregate   | % Families                     | % Bank Loans | Aggregate   |
| Miller County AR and Bowie County TX AA 2018  | 40                        | 4,922        | 100.0        | 2,984          | 22.5                 | 7.5          | 3.2        | 16.2                      | 2.5          | 10.6        | 19.2                    | 22.5         | 19.8        | 42.1                   | 52.5         | 45.8        | 0.0                            | 15.0         | 20.6        |
| <b>Total</b>  | <b>40</b>                 | <b>4,922</b> | <b>100.0</b> | <b>2,984</b>   | 22.5                 | 7.5          | <b>3.2</b> | 16.2                      | 2.5          | <b>10.6</b> | 19.2                    | 22.5         | <b>19.8</b> | 42.1                   | 52.5         | <b>45.8</b> | 0.0                            | 15.0         | <b>20.6</b> |

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2017 HMDA 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**

| 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  |
| Miller County AR & Bowie County TX AA 2017 | 16                              | 5,295        | 100.0        | 2,478          | 0.9               | 0            | 1.0        | 26.4                   | 25.0         | 22.4        | 48.6                 | 25.0         | 46.4        | 23.9                | 50.0         | 30.2        | 0.2                         | 0            | 0.1        |
| <b>Total</b>                               | <b>16</b>                       | <b>5,295</b> | <b>100.0</b> | <b>2,478</b>   | <b>0.9</b>        | <b>0</b>     | <b>1.0</b> | <b>26.4</b>            | <b>25.0</b>  | <b>22.4</b> | <b>48.6</b>          | <b>25.0</b>  | <b>46.4</b> | <b>23.9</b>         | <b>50.0</b>  | <b>30.2</b> | <b>0.2</b>                  | <b>0</b>     | <b>0.1</b> |

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 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** **2018**

| 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  |
| Miller County AR and Bowie County TX AA 2018 | 23                              | 17,373        | 100.0        | 2,478          | 0.9               | 0            | 1.0        | 26.7                   | 34.7         | 22.4        | 48.5                 | 34.7         | 46.4        | 23.7                | 30.4         | 30.2        | 0.2                         | 0            | 0.1        |
| <b>Total</b>                                 | <b>23</b>                       | <b>17,373</b> | <b>100.0</b> | <b>2,478</b>   | <b>0.9</b>        | <b>0</b>     | <b>1.0</b> | <b>26.7</b>            | <b>34.7</b>  | <b>22.4</b> | <b>48.5</b>          | <b>34.7</b>  | <b>46.4</b> | <b>23.7</b>         | <b>30.4</b>  | <b>30.2</b> | <b>0.2</b>                  | <b>0</b>     | <b>0.1</b> |

Source: 2018 D&B Data; 01/01/2018 - 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>2017</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 |
| Miller County AR and Bowie County TX AA 2017   | 16                              | 5,295        | 100.0        | 2,478          | 79.9                            | 87.5         | 49.9        | 5.5                            | 6.2          | 14.6                                   | 6.2          |
| <b>Total</b>   | <b>16</b>                       | <b>5,295</b> | <b>100.0</b> | <b>2,478</b>   | <b>79.9</b>                     | <b>87.5</b>  | <b>49.9</b> | <b>5.5</b>                     | <b>6.2</b>   | <b>14.6</b>                            | <b>6.2</b>   |

Source: 2017 D&B Data; 01/01/2017 - 12/31/2017 Bank Data; 2017 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.00

| <b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b> |                                 |               |              |                |                                 |              |             |                                |              |  | <b>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 |
| Miller County AR and Bowie County TX AA 2018   | 23                              | 17,373        | 100.0        | 2,478          | 78.7                            | 91.3         | 49.9        | 5.7                            | 8.7          | 15.5                                   | 0            |
| <b>Total</b>   | <b>23</b>                       | <b>17,373</b> | <b>100.0</b> | <b>2,478</b>   | <b>78.7</b>                     | <b>91.3</b>  | <b>49.9</b> | <b>5.7</b>                     | <b>8.7</b>   | <b>15.5</b>                            | <b>0</b>     |

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