



## **PUBLIC DISCLOSURE**

August 24, 2020

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

First Financial Bank, National Association  
Charter Number: 4166

400 Pine Street, Abilene, TX 79601

Office of the Comptroller of the Currency

Fort Worth Field Office  
225 East John Carpenter Freeway, Suite 900, Irving, TX 75062-2270

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.

**Table of Contents**

Overall CRA Rating.....3  
Description of Institution..... 4  
Scope of the Evaluation.....5  
Discriminatory or Other Illegal Credit Practices Review..... 6  
State Rating.....7  
    State of Texas.....7  
Appendix A: Scope of Examination.....A-1  
Appendix B: Summary of MMSA and State Ratings.....B-1  
Appendix C: Definitions and Common Abbreviations.....C-1  
Appendix D: Tables of Performance Data.....D-1

## Overall CRA Rating

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

The following table indicates the performance level of First Financial Bank, National Association (FFB) with respect to the Lending, Investment, and Service Tests:

Performance Levels	First Financial Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on the level of community development (CD) lending with FFB being a leader in CD lending, the adequate geographic and borrower distribution of lending, and a high percentage of the bank’s loans being in the assessment areas.
- The Investment Test rating is based on the excellent level of investments and excellent responsiveness to credit and CD needs.
- The Service Test rating is based on the accessibility of branch offices to borrowers and geographies of different income levels and the bank providing a relatively high level of CD services.

### Lending in Assessment Area

A high percentage of the bank’s loans are in its assessment areas (AAs).

The bank originated and purchased 84.7 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Mortgage	9,702	84.4	1,794	15.6	11,496	1,802,467	80.0	449,659	20.0	2,252,126
Small Business	8,574	85.9	1,403	14.1	9,977	1,001,132	81.2	231,709	18.8	1,232,841
Small Farm	2,309	81.8	515	18.2	2,823	172,568	75.4	56,437	24.6	229,005
Total	20,584	84.7	3,712	15.3	24,296	2,976,167	80.1	737,805	19.9	3,713,972

## Description of Institution

FFB is an intrastate community bank headquartered in Abilene, Texas. The bank is wholly owned by First Financial Bankshares, Inc. (NASDAQ: FFIN). FFB is a full-service financial institution that generates deposits and originates a full range of credit products including consumer, commercial, small business, agriculture, and real estate loans. As of December 31, 2019, the bank reported total assets of \$8.2 billion, total loans of \$4.2 billion, and total investments of \$3.4 billion. The bank reported total deposits of \$6.7 billion and tier 1 capital of \$855.5 million. Loans represent 51 percent of total assets. The loan portfolio breakdown reflects commercial real estate, home mortgage loans, and commercial and industrial loans as the primary lending products. As of December 31, 2019, commercial real estate loans comprised 37 percent of the loan portfolio, followed by mortgage loans at 26 percent, commercial loans at 16 percent, and consumer loans at 10 percent. Agriculture loans were not a significant portion of the portfolio at 6 percent.

FFB's overall market reach encompasses 29 counties across Texas and is centered in Central, North Central, Southeast, and West Texas. The bank designates the Abilene MSA (Abilene AA), portions of the Beaumont-Port Arthur MSA (Beaumont AA), portions of the Dallas-Fort Worth-Arlington MSA (DFW AA), portions of the Houston-The Woodlands-Sugar Land MSA (Houston AA), the entire Odessa MSA (Odessa AA), Tom Green County in the San Angelo MSA (San Angelo AA), and 13 non-MSA counties (Non-MSA AA) as its AAs. Within these AAs, the bank operates 72 branches; 13 branches of which are located in the Abilene AA, five in the Beaumont AA, 20 in the DFW AA, 10 in the Houston AA, one in the Odessa AA, two in the San Angelo AA, and the remaining 21 in the non-MSA counties. In addition to traditional bank/drive thru operations, 76 deposit-taking ATMs are available across the bank's AAs.

FFB completed the acquisition of Commercial Bancshares, Inc., Kingwood, Texas since our prior CRA performance evaluation. This resulted in four additional branch locations and expanded the bank's footprint in the Houston AA, while also increasing the number of non-MSA counties.

We did not consider the activities of affiliates in this evaluation. There are no legal or financial impediments hindering FFB's ability to meet the credit, investment, or service needs of its AAs. The bank received a "Satisfactory" rating at the last CRA evaluation dated July 24, 2017. We reviewed the bank's CRA public file and the OCC consumer complaint records for complaints filed since the previous evaluation. We did not identify any complaints relating to the bank's CRA performance.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending, Investment, and Service Tests. In evaluating the bank's lending performance, we reviewed residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA), small loans to businesses and farms as reported under the CRA, and CD loans. We also evaluated qualified investments, including donations and grants, as well as retail and CD services.

The evaluation period for HMDA and small loans to businesses and farms is January 1, 2017 through December 31, 2019. The review period for CD loans, the Investment Test, and Service Test is July 25, 2017 through December 31, 2019. With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are not addressed in this evaluation. Bank qualifying activities will be considered in the subsequent evaluation.

### Selection of Areas for Full-Scope Review

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

FFB's designated AAs are all within the state of Texas. The bank's AAs consist of whole geographies, meet the requirements of the CRA regulation, and do not arbitrarily exclude any low- or moderate-income areas. For this evaluation period, we performed a full-scope review of the Abilene AA, DFW AA, and Houston AA. We completed limited-scope reviews for the remaining AAs. Refer to the "Scope" section under each State Rating section 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.

During the evaluation period, FFB experienced changes in the county and census tract composition in several of its AAs. In 2018, changes implemented by the Office of Management and Budget (OMB) resulted in the removal of Somervell and Hood counties from the DFW AA, with these changes effective January 2019. In 2018 and 2019, the bank expanded its footprint in the Houston area with the acquisition of Commercial Bancshares, Inc., Kingwood and opening of a new branch in Spring, Texas resulting in Fort Bend county and numerous census tracts in Harris county being included in the bank's Houston AA designation. As a result, tables presented to reflect geographical and borrower income distributions for the Lending Test under Appendix D will reflect these changes. For the DFW AA, demographic data reported in 2017 and 2018 will be presented in one table and data for 2019 will be presented in a separate table. For the Houston AA, demographic data for 2017, 2018, and 2019 will each be presented separately. Since there were no changes in the Abilene AA during the evaluation period, combined data for 2017 – 2019 will be presented in one table.

## **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. When determining conclusions for FFB, we weighted performance in the three full-scope AAs equally. When evaluating the bank's performance under the Lending Test, we placed greater weight on the bank's distribution of small business loans and home mortgage loans, as these are both primary products in terms of volume.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

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

Pursuant to 12 C.F.R. §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 Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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<sup>1</sup>:** Satisfactory

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

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- The bank's lending activity is good and reflects good responsiveness to the credit needs of its AAs.
- The bank originates a high percentage of its loans within its designated AAs.
- The bank exhibits adequate geographic distribution of loans within its AAs.
- The bank reflects an adequate distribution of loan to borrowers of different income levels and businesses and farms of different sizes.
- The bank is a leader in making CD loans, which has had a positive impact on the bank's performance under the Lending Test.
- The bank has an overall excellent level of qualified CD investments that are responsive to community needs.
- The bank's service delivery systems are accessible to geographies and individuals of different income levels in the AAs.
- The bank provides a relatively high level of CD services.

### Description of Institution's Operations in Texas

FFB operates only within the state of Texas. Of its seven AAs, a high volume of deposit and lending activity is centered in the Abilene AA and DFW AA. In the Abilene AA, the bank has \$1.6 billion or 41.5 percent of the deposit market share and ranks 1<sup>st</sup> out of 27 financial institutions. In the DFW AA, FFB has \$1.4 billion or 2.0 percent of the deposit market share and ranks 8<sup>th</sup> among 117 financial institutions. Finally, FFB has \$549 million or 1.7 percent of the deposit market share in the Houston AA making it the 12<sup>th</sup> largest depositor out of 56 financial institutions in the AA.

Approximately 25 percent of FFB's deposits are located in the Abilene AA, while 22 percent are held in the DFW AA, and 8.5 percent are held in the Houston AA. FFB operates in highly competitive markets. FFB faces the largest competition in the DFW and Houston AAs where it competes with local community banks, credit unions, mortgage companies, as well as larger regional and nationwide

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<sup>1</sup> This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.



institutions. Major competitors in the Abilene AA include small and large community banks as well as mortgage companies and nationwide institutions.

We completed two community contacts in the Abilene AA with representatives from a small business development center and an affordable housing organization that works with low-income families who would not otherwise be able to afford a home. The contacts indicated primary needs in the AA are lending for small and micro businesses, rehab programs to help preserve existing housing units in LMI areas, school aged financial literacy, increased bank participation in the Dallas Federal Home Loan Bank programs, and a program to acquire bank owned foreclosed single-family units.

We completed two community contacts in the DFW AA with representatives from a local chamber of commerce and an affordable housing organization. Community contacts indicated a need for capital funding and business development services for small businesses in the area AA. More specifically, financial education and technical assistance for small businesses was stated to be what local businesses are lacking in. In addition to this, affordable housing was identified as a resource needed within the AA, especially given the high population growth rate in the area.

We completed two community contacts in the Houston AA with representatives from a housing department and an affordable housing organization. Primary needs in the AA are affordable housing, small business technical assistance and financing, financial literacy, and job training programs.

## Abilene AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Abilene AA 2017-2019						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	47	0.0	27.7	42.6	21.3	8.5
Population by Geography	167,945	0.0	23.1	41.3	30.4	5.2
Housing Units by Geography	70,396	0.0	22.6	47.2	30.2	0.0
Owner-Occupied Units by Geography	38,193	0.0	15.1	47.9	37.0	0.0
Occupied Rental Units by Geography	22,045	0.0	34.8	43.7	21.5	0.0
Vacant Units by Geography	10,158	0.0	24.2	52.5	23.2	0.0
Businesses by Geography	10,654	0.0	24.6	41.9	32.6	0.9
Farms by Geography	554	0.0	7.4	56.5	36.1	0.0
Family Distribution by Income Level	39,448	21.5	17.7	20.2	40.6	0.0
Household Distribution by Income Level	60,238	24.1	16.3	17.6	42.0	0.0
Median Family Income MSA - 10180 Abilene, TX MSA		\$62,900	Median Housing Value			\$95,509
			Median Gross Rent			\$790
			Families Below Poverty Level			12.7%
<i>Source: 2015 ACS and 2019 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>						

**DFW AA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: DFW AA 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)	595	10.1	20.2	38.8	30.8	0.2
Population by Geography	3,203,325	7.8	18.4	40.1	33.7	0.0
Housing Units by Geography	1,221,968	7.9	18.7	41.0	32.4	0.0
Owner-Occupied Units by Geography	721,611	3.7	13.3	41.3	41.6	0.0
Occupied Rental Units by Geography	403,906	14.0	26.9	40.5	18.6	0.0
Vacant Units by Geography	96,451	13.5	24.1	40.7	21.7	0.0
Businesses by Geography	242,518	5.7	16.1	34.9	43.2	0.1
Farms by Geography	5,773	3.0	11.6	43.6	41.7	0.0
Family Distribution by Income Level	796,569	20.6	16.0	19.3	44.1	0.0
Household Distribution by Income Level	1,125,517	22.0	15.9	18.2	43.9	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX MD		\$77,200	Median Housing Value			\$163,086
Median Family Income MSA - 23104 Fort Worth-Arlington, TX MD		\$75,000	Median Gross Rent			\$964
			Families Below Poverty Level			9.7%
<i>Source: 2015 ACS 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>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: DFW AA 2019</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)	583	9.8	20.8	37.0	32.2	0.2
Population by Geography	3,141,546	7.6	18.8	38.5	35.0	0.0
Housing Units by Geography	1,192,908	7.7	19.2	39.1	33.9	0.0
Owner-Occupied Units by Geography	703,223	3.6	13.7	39.4	43.3	0.0
Occupied Rental Units by Geography	397,976	13.8	27.5	38.9	19.8	0.0
Vacant Units by Geography	91,709	13.6	25.2	37.7	23.5	0.0
Businesses by Geography	281,640	5.3	16.0	32.1	46.5	0.1
Farms by Geography	6,414	3.0	12.3	40.0	44.6	0.0
Family Distribution by Income Level	779,670	20.6	16.0	19.2	44.2	0.0
Household Distribution by Income Level	1,101,199	21.9	15.9	18.1	44.1	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$83,100	Median Housing Value			\$163,540
Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX		\$75,300	Median Gross Rent			\$966
			Families Below Poverty Level			9.7%

Source: 2015 ACS and 2019 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.

## Houston AA

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Houston AA 2017</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)	62	3.2	21.0	30.6	45.2	0.0
Population by Geography	525,164	1.9	18.9	28.3	50.9	0.0
Housing Units by Geography	198,156	1.8	17.8	29.5	50.9	0.0
Owner-Occupied Units by Geography	130,585	0.9	16.2	26.4	56.5	0.0
Occupied Rental Units by Geography	49,741	4.1	22.2	36.6	37.1	0.0
Vacant Units by Geography	17,830	2.7	17.1	31.8	48.3	0.0
Businesses by Geography	39,494	1.6	14.0	26.8	57.6	0.0
Farms by Geography	1,003	1.0	15.7	33.5	49.9	0.0
Family Distribution by Income Level	134,216	18.8	13.8	16.8	50.5	0.0
Household Distribution by Income Level	180,326	20.2	14.3	16.1	49.4	0.0
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		\$72,500	Median Housing Value			\$200,072
			Median Gross Rent			\$1,081
			Families Below Poverty Level			9.1%

Source: 2015 ACS and 2017 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\*) The NA category consists of geographies that have not been assigned an income classification.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Houston AA 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)	148	2.7	14.9	31.8	50.0	0.7
Population by Geography	1,244,880	1.7	12.7	27.4	57.9	0.2
Housing Units by Geography	437,535	1.8	12.4	28.1	57.7	0.0
Owner-Occupied Units by Geography	310,101	0.8	10.5	25.0	63.7	0.0
Occupied Rental Units by Geography	98,330	4.4	17.7	37.4	40.5	0.0
Vacant Units by Geography	29,104	3.1	15.1	29.7	52.2	0.0
Businesses by Geography	102,871	1.3	8.3	24.4	65.9	0.0
Farms by Geography	2,128	1.5	11.2	29.0	58.3	0.0
Family Distribution by Income Level	321,609	15.3	12.6	16.4	55.7	0.0
Household Distribution by Income Level	408,431	16.4	12.5	15.7	55.4	0.0

Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA	\$75,600	Median Housing Value	\$205,549
		Median Gross Rent	\$1,170
		Families Below Poverty Level	7.5%
<i>Source: 2015 ACS 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>			

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Houston AA 2019</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)	159	2.5	13.8	35.2	47.8	0.6
Population by Geography	1,340,630	1.6	11.8	31.1	55.3	0.2
Housing Units by Geography	471,006	1.7	11.5	31.6	55.2	0.0
Owner-Occupied Units by Geography	333,826	0.8	9.8	28.6	60.8	0.0
Occupied Rental Units by Geography	106,228	4.0	16.4	40.7	38.8	0.0
Vacant Units by Geography	30,952	2.9	14.2	32.9	50.1	0.0
Businesses by Geography	131,249	1.1	7.4	25.3	66.1	0.0
Farms by Geography	2,521	1.1	10.2	31.3	57.4	0.0
Family Distribution by Income Level	345,390	15.4	13.1	16.8	54.7	0.0
Household Distribution by Income Level	440,054	16.4	12.9	16.1	54.6	0.0
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		\$77,100	Median Housing Value			\$199,111
			Median Gross Rent			\$1,173
			Families Below Poverty Level			7.6%
<i>Source: 2015 ACS 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>						

## Scope of Evaluation in Texas

Three of the bank's AAs were selected for full-scope reviews. The Abilene AA, DFW AA, and Non-MSA AA each received a full-scope review at the last evaluation due to the bank's high percentage of deposits in those AAs. These AAs continue to have the highest percentage of deposits at 25 percent, 22 percent, and 26 percent, respectively. The Houston AA has 8.5 percent of total deposits. Additionally, the branch presence in the Houston AA has increased significantly since the last evaluation due to the acquisition of Commercial Bancshares, Inc., Kingwood in 2018 and the opening of a new branch in Spring, TX in 2019. The bank now has 10 branches in this AA. As a result, it is being selected for a full-scope review at this evaluation. We also completed a full scope review of the Abilene AA and DFW AA due to the continued branch presence and lending volume in these AAs. Combined, the three full-scope AAs represent approximately 55 percent of total deposits, 60 percent of the bank's branches, and 69 percent of reported lending activity.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

### LENDING TEST

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

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Abilene, DFW, and Houston AAs is good. The level of community development lending is good and had a positive impact on lending performance.

### Lending Activity

Lending levels reflect good responsiveness to AA credit needs. We identified home mortgage and small business loans as the bank's primary lending products and reviewed those products for the lending test. We reviewed small farm loans as an additional lending product.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Abilene AA	2,548	1,520	423	20	4,511	21.74	24.55
DFW AA	3,761	2,531	446	21	6,759	32.57	21.97
Houston AA	593	764	41	11	1,409	6.79	8.51
Beaumont AA	720	1,114	12	29	1,875	9.03	7.84
Odessa AA	34	18	3	1	56	0.27	0.61
San Angelo AA	592	486	128	10	1,216	5.86	10.12
Non-MSA AA	1,454	2,141	1,255	39	4,889	23.56	26.39
Statewide with no Purpose, Mandate, or Function	0	0	0	38	38	0.18	0.0
	<b>9,702</b>	<b>8,574</b>	<b>2,308</b>	<b>166</b>	<b>20,753</b>	<b>100.00</b>	<b>100.00</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Abilene AA	415,746	186,763	24,746	25,658	652,913	20.14	24.55
DFW AA	801,736	306,570	36,539	19,419	1,164,264	35.92	21.97
Houston AA	144,832	119,571	3,316	28,426	296,145	9.14	8.51
Beaumont AA	108,719	139,201	568	75,604	324,092	10.00	7.84
Odessa AA	4,137	3,265	283	1,900	9,585	0.30	0.61
San Angelo AA	116,355	60,700	15,268	12,371	204,694	6.31	10.12
Non-MSA AA	210,942	185,062	91,848	54,427	542,279	16.73	26.39
Statewide with no Purpose, Mandate, or Function	0	0	0	47,678	47,678	1.47	0.0
	<b>1,802,467</b>	<b>1,001,132</b>	<b>172,568</b>	<b>265,483</b>	<b>3,241,650</b>	<b>100.00</b>	<b>100.00</b>

\*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Based on the data in Lending Volume Tables O, P, Q, and R, lending levels within the Abilene, DFW, and Houston AAs is good and reflects FFB's good responsiveness to the credit needs of its AAs. The bank originated a good volume of loans in the AAs relative to its capacity based on deposits, competition, market presence, and business strategy. During the review period, FFB originated 20,715 loans totaling \$3.19 billion within the state of Texas.

### Abilene AA

Based on the Federal Deposit Insurance Corporation (FDIC) Market Share data as of June 30, 2019, FFB ranked 1<sup>st</sup> amongst 27 depository institutions within the Abilene AA with a deposit market share of 41.53 percent. FFB operates 13 branches within the AA and the market share by number of branches is 25.49 percent. In addition to FFB, the institutions with the largest market share of deposits within the AA are Abilene Teachers, Prosperity Bank, Bank of America N.A., and First National Bank Baird. The top five institutions with the largest market share collectively hold 71.44 percent of the deposit market share.

Based on 2019 Peer Mortgage Data, FFB ranked 1<sup>st</sup> amongst 221 reporting lenders with a 14.82 percent market share of home mortgage loans within the AA. Although FFB's proportion of home mortgage loans within the Abilene AA is lower than its deposit market share, it is the top lender for mortgage loans within the AA. Given the highly competitive nature of the home mortgage market within the AA from regional, state and national banks, as well as non-depository mortgage institutions, the bank's lending activity for all home mortgages is considered good. The top five mortgage lenders hold 34.11 percent of the total lender market share. In addition to FFB, the top lenders within the AA are Prime Lending, Wells Fargo Bank N.A., Amerihome Mortgage Company, and City Bank.

According to the 2018 Peer Small Business Data, FFB's loans to small businesses ranked 1<sup>st</sup> with a 21.47 percent market share by number of loans and a 53.30 percent share by dollar of loans out of 76 reporting lenders. The bank's lending to businesses by number of loans is lower than its deposit market share of 41.53 percent however, the bank's market share in dollar volume exceeds its deposit market share. Including FFB, the top small business lenders within the AA, with a combined market share of 52.66 percent, are American Express National Bank, Lake Forest Bank and Trust, Capital One Bank USA N.A. and Synchrony Bank.

### DFW AA

Based on the FDIC Market Share data as of June 30, 2019, FFB ranked 8<sup>th</sup> amongst 117 depository institutions within the DFW AA with a deposit market share of 1.99 percent. FFB operates 20 branches within the AA and the market share by number of branches is 2.81 percent. The five largest institutions within the AA, with a collective market share of 54.24 percent, are JP Morgan Chase Bank N.A., Wells Fargo Bank N.A., Bank of America N.A., American Airlines, and Frost Bank.

Based on 2019 Peer Mortgage Data, FFB achieved a 0.77 percent market share of home mortgage loans, ranking 29<sup>th</sup> among 815 reporting lenders and is considered amongst the top 4 percent of lenders within the AA. FFB's proportion of home mortgage loans is lower than its deposit market share within the AA, however the lending activity is considered adequate as reflected by the bank's ranking and the highly competitive market for home loans within the AA. The top five mortgage lenders which collectively hold 21.47 percent of the home mortgage market share are Wells Fargo Bank N.A., JP Morgan Chase Bank N.A., Quicken Loans, Bank of America N.A., and Amerihome Mortgage Company.

The 2018 Peer Small Business Data reports that the bank's loans to small businesses ranked 13<sup>th</sup> out of 198 reporting lenders with a market share of 1.50 percent. This keeps the bank in the top 7 percent

among small business lenders within the AA. The bank's market share is relatively consistent with its deposit market share. The top small business lenders within the AA comprise of Chase Bank USA N.A., American Express National Bank, Bank of America N.A., Wells Fargo Bank N.A., and Citibank N.A. These top five lenders collectively hold a market share of 60.18 percent.

#### Houston AA

Based on the FDIC Market Share data as of June 30, 2019, FFB ranked 12<sup>th</sup> amongst 56 depository institutions within the Houston AA with a deposit market share of 1.72 percent and ranking in the top 20 percent of financial institutions. The five largest institutions within the AA, which hold a combined market share of 60.32 percent, are JP Morgan Chase Bank N.A., Wells Fargo N.A., Bank of America N.A., Woodforest National Bank, and Zions Bancorporation N.A.

Based on 2019 Peer Mortgage Data, FFB achieved a 0.26 percent market share of home mortgage loans, ranking 81<sup>th</sup> among 649 reporting lenders within the AA. The bank ranks in the top 13 percent of lenders within the AA. While this is well below the bank's deposit market share, the level of home mortgage lending is adequate when considering the level of competition for mortgage loans in the AA include mortgage companies and banks with a broader selection of mortgage products. The top five mortgage lenders within the AA are Wells Fargo Bank N.A., JP Morgan Chase Bank N.A., Quicken Loans, Bank of America N.A., and United Shore Financial Service and collectively, they hold 22.19 percent of the home mortgage market share.

According to the 2018 Peer Small Business Data, FFB's small loans to businesses within the AA ranked 35<sup>th</sup> out of 218 reporting lenders with a 0.26 percent market share. The bank ranks in the top 16 percent of lenders within the AA. The bank's small business lending is significantly lower than its deposit market share, however the bank's market share by total dollar amount of loans originated is closer to the bank's deposit market share at 1.20 percent. The top small business lenders in this AA by number of loans are Chase Bank USA N.A., American Express National Bank, Bank of America N.A., Wells Fargo Bank N.A., and Capital One Bank USA N.A.

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

The bank exhibits an adequate geographic distribution of loans in its AAs. This is based on overall adequate distribution of lending in the Abilene and DFW AAs, and good distribution of lending in the Houston AA.

### Abilene AA

The overall geographic distribution of loans within the Abilene AA reflects an adequate distribution to moderate-income geographies within the AA. There are no low-income geographies in the AA.

### ***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.

The geographic distribution of home mortgage loans within the Abilene AA is adequate.

During 2017 – 2019, the bank's level of home mortgage lending was somewhat lower than the percentage of owner-occupied units in moderate-income geographies, but near to the level of aggregate lending within these geographies by similarly situated financial institutions. One of the factors driving the bank's lower penetration of home mortgage lending in moderate-income tracts is the limited supply of housing in Abilene. In 2019, housing inventory decreased by 4.1 percent year-over-year and home prices appreciated 5.08 percent, potentially putting the purchase of a home out of the reach of low- and moderate-income earners. Additionally, the moderate-income tracts within the AA are concentrated in the downtown area where several of the city's businesses, universities, and hospitals are located. In 2019, approximately 23 percent of all homes within the Abilene AA were located in moderate-income tracts and 50 percent of housing units within those tracts were renter-occupied.

### ***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.

The geographic distribution of small loans to businesses located in the Abilene AA is adequate. During 2017 – 2019, the bank's lending to small businesses in moderate-income geographies was somewhat lower than the percentage of small businesses within moderate-income geographies but near to the aggregate level of lending within these geographies.

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

Refer to Table S 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 farms.

The geographic distribution of small loans to farms in the Abilene AA is adequate. During 2017 – 2019, the bank's lending to farms in moderate-income geographies was lower than the percentage of farms within moderate-income geographies, but was equal to the level of aggregate lending within moderate-income tracts.



DFW AA

The overall geographic distribution of loans within the DFW AA reflects an adequate distribution.

***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.

The geographic distribution of home mortgage loans reflects an adequate distribution to low- and moderate-income geographies in the DFW AA.

In 2017 – 2018, the bank's level of home mortgage lending was lower than the level of owner-occupied units in low-income geographies and somewhat lower than the aggregate level of lending within low-income geographies. The bank's distribution of home mortgage loans to moderate-income geographies was somewhat lower than the percentage level of owner-occupied units within low-income geographies but near to the level of aggregate lending within those geographies.

In 2019, the bank's level of home mortgage lending was lower than the level of owner-occupied units in low-income geographies but near to the aggregate level of lending within those geographies. The bank's distribution of home mortgage loans was somewhat lower than the level of owner-occupied units in moderate-income geographies within the AA but near to the aggregate level of lending within those geographies.

***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.

The geographic distribution of small loans to businesses located in the DFW AA is adequate.

During 2017 – 2018, the bank's lending to small businesses in low-income geographies was lower than the percentage of businesses within low-income geographies and lower than the level of aggregate lending in low-income tracts. The bank's distribution of small loans to businesses in moderate-income geographies was near to the percentage of businesses in those geographies and near to the level of aggregate lending by peer financial institutions within the AA.

In 2019, FFB's lending to small businesses in low-income geographies was lower than the percentage of businesses within low-income geographies. During the same period, FFB's distribution of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in those geographies. As of our examination date, data on the level of aggregate lending of small loans to businesses for 2019 was not yet available.

***Loans to Small Farms***

Refer to Table S 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 farms.

The geographic distribution of small loans to farms within the DFW AA is poor.

During 2017 – 2018, bank’s small loans to farms in low-income geographies was lower than the percentage of farms in low-income geographies and lower than the level of aggregate lending within those geographies. The bank’s small loans to farms in moderate-income geographies was lower than the percentage of farms in the moderate-income geographies and lower than the level of aggregate lending.

In 2019, FFB’s lending to small farms in low-income geographies was lower than the percentage of farms within low-income geographies. FFB’s lending to small farms in moderate-income geographies was lower than the percentage of farms within those moderate-income geographies. As of our examination date, data on the level of aggregate lending of small loans to farms for 2019 was not yet available.

#### Houston AA

The overall geographic distribution of loans in the Houston AA is good.

#### ***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.

The geographic distribution of home mortgage loans reflects a good distribution of lending to low- and moderate-income geographies throughout the Houston AA.

In 2017, the bank’s level of home mortgage lending in low-income geographies was somewhat lower than the percentage of owner-occupied units within those low-income geographies but exceeded the aggregate level of lending within low-income geographies. The bank’s distribution of home mortgage loans to moderate-income geographies was near to the percentage level of owner-occupied units within those geographies and exceeded the level of aggregate lending within those geographies.

In 2018, the bank did not originate any mortgage loans within the low-income geographies. The bank’s distribution of home mortgage loans to moderate-income geographies was near to the percentage level of owner-occupied units in moderate-income geographies and exceeded the level of aggregate lending within those geographies.

In 2019, the bank’s level of home mortgage lending was somewhat lower than the level of owner-occupied units in low-income geographies within the AA but exceeded the level of aggregate lending in low-income geographies. The bank’s distribution of home mortgage loans to moderate-income geographies exceeded the level of owner-occupied units in moderate-income geographies and exceeded the aggregate level of home mortgage lending in moderate-income geographies.

#### ***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.

The bank’s geographic distribution of small loans to businesses within the Houston AA is excellent.

In 2017, FFB’s lending to small businesses in low-income geographies exceeded the percentage of businesses within low-income geographies and similarly exceeded the aggregate level of lending within these low-income geographies. During the same period, FFB’s distribution of small loans to businesses

in moderate-income geographies exceeded the percentage of businesses in those geographies and exceeded the aggregate level of lending of peer banks within the AA.

In 2018, FFB's lending to small businesses in low-income geographies exceeded the percentage of businesses within low-income geographies and exceeded the level of aggregate lending by peer banks. During the same period, FFB's distribution of small loans to businesses in moderate-income geographies was excellent as it exceeded the percentage of businesses in moderate-income geographies and exceeded the level of aggregate lending in those geographies by peer banks.

In 2019, FFB's lending to businesses in low-income geographies exceeded the percentage of businesses within low-income geographies. During the same period, the bank's distribution of small loans to businesses in moderate-income geographies exceeded the percentage of businesses in moderate-income geographies. As of our examination date, data on the level of aggregate lending of loans to businesses in 2019 was not yet available.

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

Refer to Table S 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 farms.

The bank's geographic distribution of small loans to farms within the Houston AA is good.

In 2017, FFB had no lending penetration to small farms in low-income geographies, however the bank's lending to farms in moderate-income geographies exceeded the percentage of farms in moderate-income geographies and exceeded the aggregate lending within those geographies.

In 2018, FFB had no lending penetration to small farms in low-income geographies, however the bank's lending to farms in moderate-income geographies exceeded the percentage of farms in moderate-income geographies and exceeded the level of aggregate lending within those geographies.

In 2019, FFB had no lending penetration to small farms in low-income geographies, however the bank's lending to farms in moderate-income geographies exceeded the percentage of farms in moderate-income geographies. As of our examination date, data on the level of aggregate lending of loans to small farms for 2019 was not yet available.

### ***Lending Gap Analysis***

We evaluated the lending distribution of the bank's AAs to determine if any unexplained conspicuous gaps existed. There were no unexplained conspicuous gaps identified after reviewing performance context.

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

The bank exhibits an adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution. This is based on an adequate distribution of lending in the Abilene, DFW, and Houston AAs

### Abilene AA

The distribution of loans in the Abilene AA by the income level of individuals, small businesses and small farms is adequate.

### ***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 distribution of home mortgage loans reflects an adequate distribution among low-and moderate-income individuals within the Abilene AA.

In 2017-2019, the bank's lending to low-income borrowers was lower than the percentage of low-income families within the AA and somewhat lower than the level of aggregate lending to low-income borrowers within the AA. For moderate-income individuals, the bank's lending was somewhat lower than the percentage of families identified as moderate-income but near to the aggregate level of lending to moderate-income individuals.

### ***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 origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses within the Abilene AA is good.

In 2017-2019, the bank's lending to businesses that earned less than \$1 million in gross revenue was somewhat lower than the percentage of such businesses within the AA but exceeded the aggregate level of lending by peer banks to these businesses.

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

Refer to Table T in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The borrower distribution of loans to small farms within the Abilene AA is good.

In 2017-2019, the bank's lending to farms that earned less than \$1 million in gross revenue was somewhat lower than the percentage of such farms within the AA but exceeded the aggregate level of lending by peer banks to such farms.

### DFW AA

The distribution of loans in the DFW AA by income levels of individuals, small businesses and small farms is adequate.

***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 distribution of home mortgage loans reflects an adequate distribution among low-and moderate-income individuals within the DFW AA.

In 2017-2018, the bank's lending to low-income borrowers was lower than the percentage of low-income families but exceeded the level of aggregate lending to low-income borrowers within the AA. For moderate-income individuals, the bank's lending was somewhat lower than the percentage of families identified as moderate-income and somewhat lower than the aggregate level of lending to moderate-income families.

In 2019, the bank's lending to low-income borrowers was lower than the percentage of low-income families within the AA but exceeded the level of aggregate lending to low-income borrowers within the AA. For moderate-income individuals, the bank's lending was somewhat lower than the percentage of families identified as moderate-income and somewhat lower than the aggregate level of lending to moderate-income families.

***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 origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses within the DFW AA is adequate.

In 2017-2018, the bank's lending to businesses which earned less than \$1 million in gross revenue was somewhat lower than the percentage of such businesses within the AA but exceeded the aggregate level of lending by peer banks to these businesses.

In 2019, the bank's lending to businesses which earned less than \$1 million in gross revenue was lower than the percentage of such businesses within the AA. As of our examination date, data on the level of aggregate lending of small loans to businesses was not yet available.

***Small Loans to Farms***

Refer to Table T in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The borrower distribution of loans to small farms within the DFW AA is good.

In 2017-2018, the bank's lending to farms that earned less than \$1 million in gross revenue was somewhat lower than the percentage of such farms within the AA but exceeded the aggregate level of lending by peer banks to these farms.

In 2019, the bank's lending to farms which earned less than \$1 million in gross revenue was somewhat lower than the percentage of such farms within the AA. As of our examination date, data on the level of aggregate lending of small loans to farms was not yet available.

#### Houston AA

The distribution of loans in the Houston AA by income levels of individuals, small businesses and small farms is adequate.

#### ***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 distribution of home mortgage loans reflects an adequate distribution among low-and moderate-income individuals within the Houston AA.

In 2017, the bank's lending to low-income borrowers was significantly lower than the percentage of low-income families within the AA and somewhat lower than the level of aggregate lending to low-income borrowers within the AA. For moderate-income individuals, the bank's lending distribution was near to the percentage of moderate-income families but exceeded the aggregate level of lending to moderate-income geographies.

In 2018, the bank's lending to low-income borrowers was lower than the percentage of low-income families but exceeded the level of aggregate lending to low-income borrowers within the AA. For moderate-income individuals, the bank's lending distribution was near to the percentage of moderate-income families in the AA and exceeded the aggregate level of lending to moderate-income families.

In 2019, the bank's lending to low-income borrowers was lower than the percentage of low-income families within the AA but near to the level of aggregate lending to low-income borrowers within the AA. For moderate-income individuals, the bank's lending distribution was somewhat lower than the percentage of families identified as moderate-income and somewhat lower than the aggregate level of lending to moderate-income families.

#### ***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 origination and purchase of small loans to businesses.

The borrower distribution of small loans to businesses within the Houston AA is poor.

In 2017, the bank's lending to businesses which earned less than \$1 million in gross revenue was lower than the percentage of such businesses within the AA but near to the aggregate level of lending by peer banks to such businesses.

In 2018, the bank's lending to businesses which earned less than \$1 million in gross revenue was lower than the percentage of such businesses within the AA and somewhat lower the aggregate level of lending by peer banks to such businesses.

In 2019, the bank's lending to businesses which earned less than \$1 million in gross revenue was lower than the percentage of such businesses within the AA. As of our examination date, data on the level of aggregate lending of small loans to small businesses was not yet available.

***Small Loans to Farms***

Refer to Table T in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to farms.

The borrower distribution of loans to small farms within the Houston AA is adequate.

In 2017, the bank's lending to farms which earned less than \$1 million in gross revenue was somewhat lower than the percentage of such farms within the AA but exceeded the aggregate level of lending by peer banks to these farms.

In 2018, the bank's lending to farms which earned less than \$1 million in gross revenue was lower than the percentage of such farms within the AA but near to the aggregate level of lending by peer banks to these farms.

In 2019, the bank's lending to farms which earned less than \$1 million in gross revenue was lower than the percentage of such farms within the AA. As of our examination date, data on the level of aggregate lending of small loans to farms was not yet available.

## Community Development Lending

The institution is a leader in making CD loans. FFB's level of CD Lending had a significantly positive impact on the overall Lending Test performance in its AAs. During the evaluation period, FFB originated within its AAs, 131 CD loans totaling \$217.8 million and representing 25.55 percent of tier 1 capital.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

### Abilene AA

Within the Abilene AA, FFB originated 20 CD loans totaling \$25.66 million, or 12.32 percent of tier 1 capital allocated to the AA. These loans reflect the bank's good responsiveness to identified needs in the AA. CD loans comprised of seven loans to small businesses for job creation and stabilization of low- and moderate-income geographies, five loans to provide community services in rural and underserved communities, four loans to promote revitalization efforts, and four loans to support affordable housing. Examples of CD loans originated during the evaluation period include:

- \$4 million to fund the construction of two 5,500 square foot cottages to an organization in a moderate-income tract that focuses on providing homes for children who were orphaned, or affordable housing for single parents and their children needing a safer place to live.
- \$5 million to fund the construction of a new hotel and convention center in the Abilene downtown area, a moderate-income geography, as part of the city's bona fide plan to revitalize that area and promote job creation.
- \$2.1 million originated under the SBA 7a program to a small business which provides sweeping services for retail, warehouse and construction businesses to purchase new equipment. The new equipment will create 23 new jobs that will primarily benefit LMI individuals.

### DFW AA

Within the DFW AA, FFB originated 21 CD loans totaling \$19.42 million, or 10.41 percent of tier 1 capital allocated to the AA. These loans reflect the bank's good responsiveness to identified needs in the AA. CD loans comprised of seven loans to small businesses for job creation and stabilization of low- and moderate-income geographies, six loans to provide community services in rural and underserved communities, seven loans to promote revitalization efforts, and one loan to support affordable housing projects. Examples of CD loans originated during the evaluation period include:

- \$1.1 million to finance the building of a 16-unit apartment complex that will provide affordable housing options in the AA.
- \$3.04 million to a shoe manufacturing company to provide relocation costs to the DFW AA under the SBA 504 program.
- \$98 thousand to finance equipment that will support community services in a city in a moderate-income geography within the AA where 21 percent of the residents live below the poverty level.
- \$7 million to fund the purchase of a new operating facility to consolidate business operations in a moderate-income geography designated under the City of Fort Worth's comprehensive plan as needing revitalization.



Houston AA

Within the Houston AA, FFB originated 11 CD loans totaling \$28.43 million, or 39.34 percent of tier 1 capital allocated to the AA. These loans demonstrate the bank's high level of responsiveness to the needs within the AA. CD loans comprised of five loans to small businesses for job creation and stabilization of low- and moderate-income geographies, one loan to provide community services in rural and underserved communities, three loans to promote revitalization efforts, and two loans to support affordable housing projects. Examples of CD loans originated during the evaluation period include:

- \$2.125 million to expand a small business located in a moderate-income geography. The expansion will create 40 new jobs and will be part of a revitalization plan for this geography which is already experiencing growth.
- \$4 million to an organization which provides financing for rebuilding in declared disaster areas such as areas impacted by Hurricane Harvey. Programs are specifically targeted to low- and moderate-income households.
- \$12.4 million to an anchor retail development in a moderate-income geography. The retail development creates jobs and also aligns with the city's Comprehensive Plan for growth, expansion and revitalization of the area.

Broader Statewide Area

In addition to the CD loans made within the bank's AAs, FFB originated 38 CD loans totaling \$47.7 million in the broader statewide area with no purpose, mandate, or function to serve the AA. The bank received positive consideration for these CD loans since it met the needs of its delineated AAs. CD Loans originated included 24 loans to fund community services in low- and moderate-income geographies, seven loan to support projects revitalizing low- or moderate-income geographies, five loans to small businesses, and two loans to support affordable housing projects. Notable examples of CD lending include:

- \$18 million to an organization located in a moderate-income geography which provides disaster recovery, restoration and roofing services in relation to Hurricane Harvey.
- \$1.5 million in a line of credit facility to a hospital located in a moderate-income tract to fund medical gaps in accounts receivable for LMI individuals who typically receive Medicaid.
- \$5 million to fund the development of a service travel center and new café in an underserved/distressed community.
- \$146 thousand in loans to a city located in a rural area where 44 percent of the residents live below poverty levels to purchase equipment that will promote public safety.

## Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

During the evaluation period, the bank offered the following Down Payment Assistance Programs: TSAHC Home for Heroes, TSAHC Home Sweet Texas, and South East Texas Housing Finance. FFB originated \$1.2 million comprised of 11 notes under these programs in 2019. In addition, FFB offered payment deferrals in response to the government shutdown in 2019. Five customers took advantage of this deferral program. FFB also offered payment deferrals in response to Tropical Storm Imelda in September 2019. Five customers took advantage of this deferral program.

Hurricane Harvey was a devastating Category 4 hurricane that made landfall on Texas and Louisiana in August 2017. In an effort to assist residents who had experienced financial loss due to the event, FFB initiated the Hurricane Harvey - You First in Recovery Program. The program included a Home Improvement Recovery Program with up to 90 percent financing with no out of pocket costs, an Auto Loans Recovery Program for new auto purchases without having to wait for insurance, a Loan Payment Deferrals Plan for consumer and commercial loans for as long as 2 months, an FHA Home Loan with 100 percent financing open to renters or homeowners in a declared disaster area where their home was destroyed or damaged by the floods, and a Flood Relief Loan Program with a maximum loan amount of \$15,000 and a maximum term of 27 months with three months of interest only payments. Over 800 loans were extended under the Loan Payment Deferrals Plan. FFB funded a total of \$553,000 under the Flood Relief Loan Program to consumers and commercial borrowers. FFB also partnered with FHLB of Dallas and secured \$150,000 in grant funds for 28 small business customers and one community-based organization. In addition, FFB assisted 8 affected employees obtain \$64,000 in grant monies. FFB also provided three local non-profit organizations with rent free office space in one of their branch locations.

During the evaluation period, FFB continued to offer a special Retail Finance Program (RFP) to assist its business customers. This program has four segments to provide businesses an opportunity to offer financing for goods and services at no- or low-interest installment contracts. The maximum loan under each of the four segments is \$30,000. (1) The Retail segment has a maximum term of 60 months. (2) The indoor/outdoor segment has a maximum term of 60 months. (3) The specialty vehicle segment has a maximum term of 84 months. (4) The health and wellness segment has a maximum term of 36 months. The RFP's flexible terms address the credit needs of LMI individuals.

As detailed in the below table, there were significant originations under this program.

### RFP Loans

Assessment Area	# of Loans	2017-2019 Total Originations (000)
Abilene AA	643	\$1,815
Dallas AA	2,372	\$6,319
Houston AA	531	\$1,199
Beaumont AA	343	\$856
Odessa AA	76	\$249
San Angelo AAA	164	\$393
Non-MSA AA	289	\$595
Outside AA	3,037	\$8,034

<b>Total</b>	7,455	\$19,463
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Also, during the review period, the bank continued to participate in SBA lending as a direct lender.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, FFB's performance under the Lending Test in the Non-MSA AA is stronger than its overall performance under the Lending Test in the full-scope areas. The strong performance in the Non-MSA AA is attributable to the excellent geographic and borrower distributions for home mortgage loans and small loans to businesses, as well as a high volume of CD lending.

Based on limited-scope reviews, performance in the Beaumont and San Angelo AAs is consistent with the bank's overall performance under the Lending Test in the full-scope areas. Although geographic and borrower distributions in the Beaumont AA were adequate, the bank had its highest volume of CD lending in this AA with \$75 million in originated loans, representing 113 percent of allocated tier 1 capital. This volume of CD lending had a positive impact on the Lending Test.

Based on a limited-scope review, the bank's performance under the Lending Test in the Odessa AA is weaker than the overall performance under the Lending Test in the full-scope areas. This did not have a significant impact on the conclusions given the bank's limited deposit and lending operations within this AA.

Refer to Tables O through V in the state of Texas section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The bank's performance under the Investment Test in Texas is rated Outstanding.

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Abilene AA and Houston AA is excellent. Based on a full-scope review, the bank's performance in the DFW AA is good.

The institution has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits excellent responsiveness to credit and community economic development needs.

The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments*	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Abilene AA	17	15,854	62	16,665	79	19.51	32,519	12.28	0	0
DFW AA	19	39,149	74	18,627	93	22.96	57,776	21.82	0	0
Houston AA	8	8,601	40	42,030	48	11.85	50,631	19.12	0	0
Beaumont AA	1	302	15	36	16	3.95	338	0.13	0	0
Odessa AA	0	0	9	8,228	9	2.22	8,228	3.11	0	0
San Angelo AA	1	2,319	12	69	13	3.21	2,388	0.90	0	0
Non-MSA AA	12	2,148	104	1,412	116	28.64	3,560	1.34	0	0
Statewide with Purpose, Mandate, or Function	2	4,647	3	21,003	5	1.23	25,650	9.69	0	0
Statewide with no Purpose, Mandate, or Function	10	18,690	16	65,012	26	6.42	83,702	31.61	0	0

\* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

### Abilene AA

During the evaluation period, the bank made 79 investments and grants totaling approximately \$32.5 million. This includes 17 prior period investments totaling \$15.9 million and six current period investments totaling \$16.2 million. Additionally, there were 56 grants totaling \$426 thousand. The bank's total investments represented 15.49 percent of tier 1 capital allocated to the AA.

Although, the bank did not take a leadership position in the Abilene AA, responsiveness was considered excellent due to the numerous needs identified within the AA that were met by the bank, which include affordable housing, small business lending, and revitalization/stabilization.

Examples of investments made during the evaluation period include:

- A Fannie Mae Mortgage Backed Security for \$3.7 million to finance a 128-unit multifamily property providing the community with affordable housing.
- \$16 thousand in donations to support the local school district and school programs and contribute to improvements for schools across the district. The majority of the students within this school district are eligible for free or reduced lunches.
- Donations to several entities involved in the initiative to revitalize the downtown Abilene area. This revitalization seeks to attract businesses to the downtown area and will result in job opportunities in a moderate-income tract.

#### DFW AA

During the evaluation period, the bank made 93 investments and grants totaling approximately \$57.8 million. This includes 19 prior period investments totaling \$39.1 million and 13 current period investments totaling \$18.5 million. Additionally, there were 61 grants totaling \$152 thousand. The bank's total investments represented 30.74 percent of tier 1 capital allocated to the AA.

Examples of investments made during the evaluation period include:

- A Low-Income Housing Tax Credit (LIHTC) bond for \$1 million to finance a 144-unit multifamily property providing the community with affordable housing. These types of bonds are considered to be complex and require specialized knowledge and expertise to execute.
- A school bond for \$1.14 million to construct and renovate various schools within the district. The majority of the students within this school district are eligible for free or reduced lunches and considered economically disadvantaged.
- \$29.5 thousand in donations to an organization that provides basic needs such as clothing, food, transitional housing, and financial assistance to individuals that meet the federal poverty guidelines.

#### Houston AA

During the evaluation period, the bank made 48 investments and grants totaling approximately \$50.6 million. This includes 8 prior period investments totaling \$8.6 million and 14 current period investments totaling \$41.9 million. Additionally, there were 26 grants totaling \$92 thousand. The bank's total investments represented 69.51 percent of tier 1 capital allocated to the AA.

Although, the bank did not take a leadership position in the Houston AA, responsiveness was considered excellent due to the numerous needs identified within the AA that were met by the bank, which include revitalization and stabilization in response to Hurricane Harvey relief.

Examples of investments made during the evaluation period include:

- Two investments totaling approximately \$9 million for the purpose of revitalizing and stabilizing LMI areas that were affected by Hurricane Harvey according to an approved government plan.
- Revitalization/stabilization donations totaling \$31,500 to provide Hurricane Harvey disaster relief to FFB employees directly affected by the disaster.

#### Statewide with Purpose, Mandate, or Function

Qualified investments that are provided in the broader statewide or regional area and that have a purpose, mandate, or function to serve the bank's AAs receive consideration. During the evaluation period, management reported five investments in qualified bonds in the broader statewide area with a purpose, mandate, or function that includes serving the bank's AAs totaling \$25.7 million. This

included two prior period investments totaling \$4.6 million. The majority of the broader statewide investments were Texas revenue bonds that are for the purpose of revitalization and stabilization throughout the state. These investments have a positive effect on the bank's AAs.

#### Statewide with no Purpose, Mandate, or Function

Qualified investments that are located in the broader statewide or regional area that do not have a purpose, mandate, or function to serve the bank's AAs may receive consideration if the bank has been responsive to the needs and opportunities of its AAs. During the evaluation period, management reported 26 investments in qualified bonds in the broader statewide area that do not have a purpose, mandate, or function that includes serving the AAs totaling \$83.7 million, which includes three donations totaling \$3 thousand. Ten of these were prior period investments totaling \$18.7 million. The majority of the broader statewide investments were for school district bonds outside of the AA, but within the state of Texas.

The bank enhanced their performance by investing in bonds that impacted the broader statewide area, including the bank's AAs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Investment Test in the Odessa AA is consistent with the bank's overall performance under the Investment Test in the full-scope areas.

Based on limited-scope reviews, the bank's performance under the Investment Test in the Beaumont, San Angelo, and Non-MSA AAs is weaker than the bank's overall performance under the Investment Test in the full-scope areas. This did not have a significant impact on the conclusions given the bank's limited opportunities for investments within these AAs.

## SERVICE TEST

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

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Abilene, DFW, and Houston AAs is good.

### Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Abilene AA	41.5	13	25.5	0.0	23.1	46.2	0.0	0	23.1	41.3	30.4
DFW AA	2.0	20	2.8	5.0	25.0	30.0	40.0	7.6	18.9	38.5	35.0
Houston AA	1.7	10	3.1	0.0	10.0	10.0	80.0	1.6	11.8	31.1	55.3
Beaumont AA	6.1	5	6.0	0.0	40.0	40.0	20.0	5.7	24.5	41.7	25.0
Odessa AA	0.9	1	2.4	0.0	0.0	0.0	100.0	2.2	22.3	40.7	34.8
San Angelo AA	22.4	2	6.5	50.0	0.0	50.0	0.0	2.3	28.2	51.0	18.5
Non-MSA AA	25.0	21	17.8	0.0	28.6	47.6	23.8	0.0	20.4	53.8	25.9

#### Abilene AA

The bank's service delivery systems are accessible to geographies and individuals of different income levels throughout the Abilene AA. The bank has thirteen full-service branches in the AA, including the bank's main office. There are no low-income geographies in the AA. The bank has three branches in moderate-income areas. The bank's branch offices located in moderate-income geographies is equal to the percentage of the population (23.1 percent) within the moderate-income geographies. Additionally, the bank offers internet and mobile banking and remote deposit capture to customers regardless of geography or income level.

#### DFW AA

The bank's service delivery systems are accessible to geographies and individuals of different income levels throughout the DFW AA. The bank has twenty full-service branches in the AA. The bank has one branch in a low-income geography and five branches in moderate-income areas. One branch in a low-income geography (5 percent) is acceptable when compared to the population of 7.6 percent living in low-income geographies. The bank's branch offices located in moderate-income geographies (25 percent) is more than the percentage of the population within the moderate-income geographies (18.9 percent). Additionally, the bank offers internet and mobile banking and remote deposit capture to customers regardless of geography or income level.

#### Houston AA

The bank's service delivery systems are accessible to geographies and individuals of different income levels throughout the Houston AA. The bank has ten full-service branches in the AA. The bank has no

branches in low-income geographies but has two branches in moderate-income areas. No branches in low-income geographies is acceptable when compared to the small population (1.6 percent) living in low-income geographies. The bank's branch offices located in moderate-income geographies (10 percent) is slightly below the percentage of the population within the moderate-income geographies (11.8 percent). Additionally, the bank offers internet and mobile banking and remote deposit capture to customers regardless of geography or income level.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Abilene AA	1	1	0	0	-1	+1
DFW AA	0	0	0	0	0	0
Houston AA	1	0	0	0	0	+1
Beaumont AA	1	1	0	0	0	0
Odessa AA	0	0	0	0	0	0
San Angelo AA	0	1	0	0	-1	0
Non-MSA AA	1	1	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

FFB opened four new branches and closed four branches since the previous CRA examination. The new branches are located in Abilene, New Waverly, Spring, and Orange. The four branches closed were in Abilene, San Angelo, New Waverly, and Orange. The Abilene, New Waverly, and Orange branches were relocations. Additionally, four new branch locations were acquired as part of the Commercial Bancshares, Inc., Kingwood, acquisition effective January 2018. Two locations are in the Houston AA, one in an upper-income geography and one in a middle-income geography. The other two locations are in the Non-MSA AA, one in Wharton county in an upper-income geography and one in Matagorda county in a distressed non-metropolitan middle-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals.

Management complements its traditional service delivery methods with alternative delivery processes, including online banking, mobile banking, and telephone banking. The delivery methods provide increased access to banking services throughout all areas in the AAs. The bank has a network of deposit-taking ATMs at most branch locations.



## Community Development Services

The institution provides a relatively high level of CD services.

### Abilene AA

The bank provides a relatively high level of CD services in the Abilene AA. FFB employees from various lines of business provided 2,320 hours of CD services to 37 organizations in the AA. CD services were primarily provided to community organizations that target community services to low- and moderate-income individuals but were also provided to organizations that support affordable housing, promote economic development of small businesses, and revitalize or stabilize low- and moderate-income geographies.

Examples of these services include:

- Habitat for Humanity – Twelve employees performed 14 hours of CD service by providing financial literacy to homebuyers in the program and one employee performed 12 hours of service by serving on the Board of Directors as the Vice Chair. The organization provides affordable housing to low- and moderate-income individuals.
- Alliance for Women and Children – Two employees performed 450 hours of CD services. They provided financial expertise by serving on the Board of Directors for the organization. The organization provides services for low- and moderate-income individuals including youth programs and job training.
- Abilene Recovery Council – One employee provided 75 CD service hours by serving as the Treasurer on the Board. The Council provides substance abuse programs that are targeted to low- and moderate-income individuals.
- Abilene Independent School District – Six employees provided 97 hours of community services by serving as Policy Council Members or facilitating financial literacy programs to students. Financial literacy was provided at schools that have a majority of students who are economically disadvantaged.
- Abilene Chamber of Commerce – One employee performed 189 hours of service by serving as a member of the Board of Directors and Small Business Council Chair. Service was directed to financial matters for small businesses and organizations that promote small businesses in Abilene.
- Connecting Caring Communities – One employee performed 54.5 hours of service by serving as the President and Vice President of the Board of Directors during the examination period. The organization's purpose is to revitalize or stabilize neighborhoods subject to a bona fide government revitalization plan.

### DFW AA

The bank provides a relatively high level of CD services in the DFW AA. FFB employees from various lines of business provided 949 hours of CD services to 27 organizations in the AA. CD services were primarily provided to community organizations that target community services to low- and moderate-income individuals but were also provided to organizations that promote economic development of small businesses.

Examples of these services include:

- Court Appointed Special Advocates (CASA) – Hope for Children – Two employees performed 59 hours of CD service by serving as the President of the Board of Directors and Serving on the

Fundraising Committee. The organization provides advocates for abused and neglected children that are under the protection of the court.

- Midcities Supporters of Safe Haven - One employee provided 240 hours of service by serving as a Board member. The organization provides community services for those affected by family violence, including shelter.
- Salvation Army – Eight employees provided 44 service hours by providing financial literacy classes at the Family Life Center shelter and counting money collected from fundraising. The organization provides community services to low- and moderate-income individuals.
- United Way of Wise and Parker County – Four employees provided 194 hours of service by serving as Board and Committee members. The organization is dedicated to improving lives and building a healthier and stronger community. Over 50 percent of the organizations the United Way supports provide services targeted to low- and moderate-income individuals.
- Midlothian Chamber of Commerce – One employee performed 64 hours of service by serving as a member of Board Member and Small Business Council Chair. Service was directed to financial matters for small businesses and entrepreneurs.

#### Houston AA

The bank provides a relatively high level of CD services in the Houston AA. FFB employees from various lines of business provided 841.5 hours of CD services to nine organizations in the AA. CD services were primarily provided to community organizations that target community services to low- and moderate-income individuals but were also provided to organizations that promote economic development of small businesses, and revitalize or stabilize low- and moderate-income geographies.

Examples of these services include:

- Conroe Independent School District – Two employees provided 200 hours of services by providing financial literacy programs to students. Financial literacy was provided at schools that have a majority of students who are economically disadvantaged.
- Willis Independent School District – One employee provided 50 hours of services by providing financial literacy programs to students. Financial literacy was provided at schools that have a majority of students who are economically disadvantaged.
- Salvation Army of Montgomery County – Two employees provided 76 service hours by serving as a Board member or volunteering counting collected donations from fundraising. The organization provides community services to low- and moderate-income individuals.
- Montgomery County Community Foundation – One employee performed 72.5 hours by serving as a Board and Committee member. The organization provides funding to non-profits that have a defined mission of serving low- and moderate-income individuals.

#### Broader Statewide or Regional Area

The bank performed 504 service hours to five organizations in the broader statewide and regional area. The organizations served provide services to low- and moderate-income individuals, promote economic development and provide affordable housing.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Service Test in the Non-MSA AA is consistent with the bank's overall performance under the Service Test in the full-scope areas.

Based on limited-scope reviews, the bank's performance under the Service Test in the Odessa, San Angelo, and Beaumont AAs is weaker than the bank's overall performance under the Service Test in the full-scope areas. The bank's branch presence, thus employee numbers, in these AA is limited, resulting in limited opportunities for CD services. This did not have a significant impact on the conclusions given the bank's limited operations within these AAs.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed:</b>	01/01/2017 to 12/31/2019 – Home Mortgage, Small Business and Farm Loans 07/25/2017 to 12/31/2019 – Community Development Loans, Qualified Investments, and Community Development Services	
<b>Bank Products Reviewed:</b>	Home Mortgage Loans Small Loans to Businesses Loans to Small Farms Community Development Loans Qualified Investments Community Development Services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Texas</b>		
Abilene AA	Full-scope	2017-2019: Entire Abilene MSA including counties of Callahan, Jones, and Taylor
DFW AA	Full-scope	2017-2018: Portion of Dallas-Fort Worth-Arlington MSA including counties of Denton, Ellis, Hood, Johnson, Parker, Somervell, Tarrant, and Wise 2019: Portion of Dallas-Fort Worth-Arlington MSA including counties of Denton, Ellis, Johnson, Parker, Tarrant, and Wise
Houston AA	Full-scope	2017: Portion of Houston-The Woodlands-Sugar Land MSA including Montgomery county, as well as the following tracts in Harris county: 5553.01, 5553.02, 5553.03 2018: Portion of Houston-The Woodlands-Sugar Land MSA including Fort Bend and Montgomery counties, as well as the following tracts in Harris county: 2509.00, 2510.00, 2511.00, 2512.00, 2513.00, 2514.01, 2514.02, 2515.01, 2515.02, 2515.03, 5553.01, 5553.02, 5553.03 2019: Portion of Houston-The Woodlands-Sugar Land MSA including Fort Bend and Montgomery counties, as well as the following tracts in Harris county: 2409.01, 2409.02, 2410.00, 2411.01, 2411.02, 2411.03, 2412.00, 2413.00, 2414.00, 2509.00, 2510.00, 2511.00, 2512.00, 2513.00, 2514.01, 2514.02, 2515.01, 2515.02, 2515.03, 5551.00, 5552.00, 5553.01, 5553.02, 5553.03
Beaumont AA	Limited-scope	2017-2018: Portion of Beaumont-Port Arthur MSA including counties of Jefferson, Newton, and Orange 2019: Portion of Beaumont-Port Arthur MSA including counties of Jefferson and Orange

Odessa AA	Limited-scope	2017-2019: Entire Odessa MSA including Ector county
San Angelo AA	Limited-scope	2017-2019: Portion of San Angelo MSA including Tom Green county
Non-MSA AA	Limited-scope	2017: Non-MSA counties of Deaf Smith, Eastland, Erath, Fisher, Nolan, Palo Pinto, Shackelford, and Walker 2018: Non-MSA counties of Deaf Smith, Eastland, Erath, Fisher, Matagorda, Nolan, Palo Pinto, Shackelford, Walker, and Wharton 2019: Non-MSA counites of Deaf Smith, Eastland, Erath, Fisher, Hood, Matagorda, Newton, Nolan, Palo Pinto, Shackelford, Somervell, Walker, and Wharton

## Appendix B: Summary of MMSA and State Ratings

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RATINGS: First Financial Bank, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
First Financial Bank, N.A.	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
MMSA or State:				
Texas	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

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

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

**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.

**MMSA (state):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**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 loans are treated the same 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.

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. 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																				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	
Houston AA	182	41,740	27.5	21,789	0.9	0.5	0.4	16.2	15.9	11.2	26.4	35.2	23.2	56.5	48.4	65.2	0.0	0.0	0.0	
Non-MSA AA	481	48,372	72.5	4,433	0.0	0.0	0.0	17.4	14.6	14.2	53.0	58.2	51.8	29.6	27.2	34.0	0.0	0.0	0.0	
<b>Total</b>	<b>663</b>	<b>90,112</b>	<b>100.0</b>	<b>26,222</b>	<b>0.6</b>	<b>0.2</b>	<b>0.3</b>	<b>16.6</b>	<b>14.9</b>	<b>11.7</b>	<b>35.0</b>	<b>51.9</b>	<b>28.0</b>	<b>47.9</b>	<b>33.0</b>	<b>60.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</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	
Houston AA	227	54,727	37.8	51,511	0.8	0.0	0.3	10.5	9.3	7.4	25.0	32.6	18.6	63.7	58.2	73.6	0.0	0.0	0.0	
Non-MSA AA	374	52,792	62.2	4,380	0.0	0.0	0.0	17.4	16.0	14.5	53.0	64.2	52.5	29.6	19.8	33.0	0.0	0.0	0.0	
<b>Total</b>	<b>601</b>	<b>107,519</b>	<b>100.0</b>	<b>55,891</b>	<b>0.7</b>	<b>0.0</b>	<b>0.3</b>	<b>11.6</b>	<b>13.5</b>	<b>8.0</b>	<b>29.6</b>	<b>52.2</b>	<b>21.3</b>	<b>58.0</b>	<b>34.3</b>	<b>70.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

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

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2019</b>
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	
Beaumont AA	227	37,692	10.1	6,597	4.2	1.3	1.4	20.7	8.8	8.1	44.0	45.4	50.1	31.1	44.5	40.5	0.0	0.0	0.0	
DFW AA	1,244	277,297	55.2	143,260	3.6	1.3	1.5	13.7	7.6	9.1	39.4	37.3	38.7	43.3	53.8	50.7	0.0	0.0	0.0	
Houston AA	184	48,365	8.2	62,904	0.8	0.5	0.3	9.8	10.9	6.9	28.6	29.3	20.6	60.8	59.2	72.2	0.0	0.0	0.0	
Non-MSA AA	599	109,778	26.6	8,185	0.0	0.0	0.0	14.4	11.4	8.0	52.8	54.1	49.7	32.8	34.6	42.2	0.0	0.0	0.0	
<b>Total</b>	<b>2,254</b>	<b>473,132</b>	<b>100.0</b>	<b>220,946</b>	<b>2.6</b>	<b>0.9</b>	<b>1.1</b>	<b>13.2</b>	<b>9.0</b>	<b>8.4</b>	<b>37.7</b>	<b>41.9</b>	<b>34.3</b>	<b>46.6</b>	<b>48.2</b>	<b>56.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	

Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2017-18</b>
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	
Beaumont AA	493	71,027	16.4	6,250	4.0	1.2	1.5	20.9	11.2	8.3	45.3	51.3	51.8	29.8	36.3	38.4	0.0	0.0	0.0	
DFW AA	2,517	524,439	83.6	127,383	3.7	1.1	1.7	13.3	8.8	9.4	41.3	48.6	40.6	41.6	41.5	48.2	0.0	0.0	0.0	
<b>Total</b>	<b>3,010</b>	<b>595,466</b>	<b>100.0</b>	<b>133,633</b>	<b>3.8</b>	<b>1.1</b>	<b>1.7</b>	<b>14.2</b>	<b>9.2</b>	<b>9.4</b>	<b>41.7</b>	<b>49.1</b>	<b>41.1</b>	<b>40.3</b>	<b>40.7</b>	<b>47.8</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, 2018 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

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
Abilene AA	2,548	415,746	80.3	4,933	0.0	0.0	0.0	15.1	8.6	9.2	47.9	30.9	33.8	37.0	60.3	56.9	0.0	0.2	0.2
Odessa AA	34	4,137	1.1	4,912	1.6	5.9	1.0	21.4	5.9	8.9	42.7	26.5	26.7	34.3	61.8	63.4	0.0	0.0	0.0
San Angelo AA	592	116,355	18.7	3,391	1.4	0.3	0.5	25.2	13.2	16.5	49.4	45.4	53.7	23.9	41.0	29.3	0.0	0.0	0.0
<b>Total</b>	<b>3,174</b>	<b>536,237</b>	<b>100.0</b>	<b>13,236</b>	<b>0.9</b>	<b>0.1</b>	<b>0.5</b>	<b>20.0</b>	<b>9.5</b>	<b>11.0</b>	<b>46.5</b>	<b>33.6</b>	<b>36.2</b>	<b>32.6</b>	<b>56.7</b>	<b>52.2</b>	<b>0.0</b>	<b>0.2</b>	<b>0.1</b>

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

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
Houston AA	182	41,740	27.5	21,789	18.8	1.6	2.7	13.8	12.1	9.8	16.8	14.8	18.0	50.5	65.4	53.6	0.0	6.0	15.9
Non-MSA AA	481	48,372	72.5	4,433	22.0	6.0	3.0	17.5	14.8	10.2	19.1	17.3	17.8	41.3	55.7	50.8	0.0	6.2	18.1
<b>Total</b>	<b>663</b>	<b>90,112</b>	<b>100.0</b>	<b>26,222</b>	<b>19.8</b>	<b>4.8</b>	<b>2.7</b>	<b>15.0</b>	<b>14.0</b>	<b>9.9</b>	<b>17.6</b>	<b>16.6</b>	<b>18.0</b>	<b>47.6</b>	<b>58.4</b>	<b>53.1</b>	<b>0.0</b>	<b>6.2</b>	<b>16.3</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
Houston AA	227	54,727	37.8	51,511	15.3	3.1	2.6	12.6	11.5	11.1	16.4	20.7	18.6	55.7	57.7	50.0	0.0	7.0	17.6
Non-MSA AA	374	52,792	62.2	4,380	22.0	5.1	2.5	17.5	9.9	10.0	19.1	18.4	16.8	41.3	57.8	51.7	0.0	8.8	19.0
<b>Total</b>	<b>601</b>	<b>107,519</b>	<b>100.0</b>	<b>55,891</b>	<b>16.4</b>	<b>4.3</b>	<b>2.6</b>	<b>13.4</b>	<b>10.5</b>	<b>11.1</b>	<b>16.8</b>	<b>19.3</b>	<b>18.5</b>	<b>53.4</b>	<b>57.7</b>	<b>50.1</b>	<b>0.0</b>	<b>8.2</b>	<b>17.7</b>

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 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																			2019
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
Beaumont AA	227	37,692	10.1	6,597	23.3	4.0	2.9	17.3	4.4	11.5	18.8	11.0	21.2	40.6	62.6	46.8	0.0	18.1	17.6
DFW AA	1,244	277,297	55.2	143,260	20.6	3.1	2.9	16.0	9.6	13.4	19.2	14.6	21.6	44.2	64.0	44.9	0.0	8.8	17.1
Houston AA	184	48,365	8.2	62,904	15.4	2.2	2.4	13.1	9.2	12.1	16.8	13.0	20.2	54.7	65.2	49.4	0.0	10.3	15.9
Non-MSA AA	599	109,778	26.6	8,185	22.0	2.0	2.0	18.1	8.3	8.5	19.8	12.5	17.4	40.1	68.1	56.5	0.0	9.0	15.6
<b>Total</b>	<b>2,254</b>	<b>473,132</b>	<b>100.0</b>	<b>220,946</b>	<b>19.5</b>	<b>2.8</b>	<b>2.7</b>	<b>15.4</b>	<b>8.7</b>	<b>12.8</b>	<b>18.6</b>	<b>13.5</b>	<b>21.0</b>	<b>46.5</b>	<b>65.0</b>	<b>46.6</b>	<b>0.0</b>	<b>9.9</b>	<b>16.8</b>

Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%



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
Beaumont AA	493	71,027	16.4	6,250	23.3	2.6	4.0	17.6	8.1	12.8	18.9	14.6	18.8	40.2	62.9	42.7	0.0	11.8	21.7
DFW AA	2,517	524,439	83.6	127,383	20.6	3.7	3.6	16.0	9.9	12.9	19.3	19.0	21.3	44.1	59.5	44.2	0.0	7.9	18.0
<b>Total</b>	<b>3,010</b>	<b>595,466</b>	<b>100.0</b>	<b>133,633</b>	<b>20.9</b>	<b>3.6</b>	<b>3.6</b>	<b>16.2</b>	<b>9.6</b>	<b>12.9</b>	<b>19.2</b>	<b>18.3</b>	<b>21.2</b>	<b>43.7</b>	<b>60.0</b>	<b>44.1</b>	<b>0.0</b>	<b>8.5</b>	<b>18.2</b>

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

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
Abilene AA	2,548	415,746	80.3	4,933	21.5	2.6	3.7	17.7	11.7	13.6	20.2	19.1	21.3	40.6	56.9	44.0	0.0	9.6	17.4
Odessa AA	34	4,137	3.3	4,912	21.8	2.9	2.4	17.3	8.8	15.3	20.5	20.6	25.7	40.4	52.9	37.5	0.0	14.7	19.1
San Angelo AA	592	116,355	18.7	3,391	21.5	4.2	4.0	18.2	8.8	13.5	20.7	20.9	23.1	39.5	58.3	41.1	0.0	7.8	18.3
<b>Total</b>	<b>3,174</b>	<b>536,237</b>	<b>100.0</b>	<b>13,236</b>	<b>21.6</b>	<b>2.9</b>	<b>3.3</b>	<b>17.7</b>	<b>11.2</b>	<b>14.2</b>	<b>20.5</b>	<b>19.5</b>	<b>23.4</b>	<b>40.2</b>	<b>57.2</b>	<b>40.8</b>	<b>0.0</b>	<b>9.3</b>	<b>18.3</b>

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, 2019 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
Houston AA	198	30,462	26.5	13,800	1.6	2.5	1.2	14.0	35.4	13.3	26.8	27.3	27.5	57.6	34.8	58.0	0.0	0.0	0.0
Non-MSA AA	549	34,156	73.5	4,467	0.0	0.0	0.0	22.9	18.4	19.5	51.0	55.6	51.8	26.1	26.0	28.7	0.0	0.0	0.0
<b>Total</b>	<b>747</b>	<b>64,618</b>	<b>100.0</b>	<b>18,267</b>	<b>1.2</b>	<b>0.7</b>	<b>0.9</b>	<b>16.4</b>	<b>22.9</b>	<b>14.8</b>	<b>33.4</b>	<b>48.1</b>	<b>33.5</b>	<b>49.0</b>	<b>28.4</b>	<b>50.8</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</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
Houston AA	287	44,670	27.3	38,685	1.3	2.8	1.1	8.3	27.5	7.5	24.4	27.5	23.4	65.9	42.2	68.1	0.0	0.0	0.0
Non-MSA AA	764	68,957	72.7	4,814	0.0	0.0	0.0	22.5	19.8	19.4	51.5	55.1	53.1	26.0	25.1	27.5	0.0	0.0	0.0
<b>Total</b>	<b>1,051</b>	<b>113,627</b>	<b>100.0</b>	<b>43,499</b>	<b>1.2</b>	<b>0.8</b>	<b>1.0</b>	<b>10.1</b>	<b>21.9</b>	<b>8.8</b>	<b>27.8</b>	<b>47.6</b>	<b>26.7</b>	<b>60.9</b>	<b>29.8</b>	<b>63.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 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														2019	
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Beaumont AA	401	49,995	17.5	5.0	0.5	22.3	13.7	47.1	48.4	25.5	37.4	0.1	0.0		
DFW AA	780	99,058	34.1	5.3	1.5	16.0	17.9	32.1	39.0	46.5	41.5	0.1	0.0		
Houston AA	279	44,439	12.2	1.1	2.5	7.4	24.0	25.3	33.0	66.1	40.5	0.0	0.0		
Non-MSA AA	828	81,949	36.2	0.0	0.0	16.7	16.1	49.8	56.5	33.5	27.4	0.0	0.0		
<b>Total</b>	<b>2,288</b>	<b>275,441</b>	<b>100.0</b>	<b>3.8</b>	<b>0.9</b>	<b>13.9</b>	<b>17.3</b>	<b>31.8</b>	<b>46.2</b>	<b>50.4</b>	<b>35.6</b>	<b>0.1</b>	<b>0.0</b>		

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2017-18	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Beaumont AA	713	89,206	28.9	5,686	5.1	1.0	5.2	20.6	15.3	18.2	49.7	50.9	48.9	24.6	32.8	27.8	0.1	0.0	0.0		
DFW AA	1,751	207,512	71.1	74,268	5.7	1.5	5.3	16.1	13.3	15.4	34.9	51.2	33.6	43.2	34.1	45.6	0.1	0.0	0.1		
<b>Total</b>	<b>2,464</b>	<b>296,718</b>	<b>100.0</b>	<b>79,954</b>	<b>5.6</b>	<b>1.3</b>	<b>5.3</b>	<b>16.4</b>	<b>13.8</b>	<b>15.6</b>	<b>36.1</b>	<b>51.1</b>	<b>34.7</b>	<b>41.7</b>	<b>33.7</b>	<b>44.3</b>	<b>0.1</b>	<b>0.0</b>	<b>0.1</b>		

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

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
Abilene AA	1,520	186,763	75.1	3,096	0.0	0.0	0.0	23.9	17.8	19.2	40.7	46.6	43.9	34.5	35.2	36.7	0.8	0.4	0.2
Odessa AA	18	3,265	0.9	3,376	1.4	0.0	1.2	22.0	5.6	20.9	33.3	55.6	35.9	43.3	38.9	42.0	0.0	0.0	0.0
San Angelo AA	486	60,700	24.0	1,799	11.6	15.2	7.6	21.0	15.4	22.3	43.8	47.3	44.8	23.3	21.2	25.0	0.4	0.8	0.3
<b>Total</b>	<b>2,024</b>	<b>250,728</b>	<b>100.0</b>	<b>8,271</b>	<b>3.5</b>	<b>3.7</b>	<b>2.1</b>	<b>22.5</b>	<b>17.1</b>	<b>20.6</b>	<b>38.9</b>	<b>46.8</b>	<b>40.8</b>	<b>34.7</b>	<b>31.9</b>	<b>36.3</b>	<b>0.4</b>	<b>0.5</b>	<b>0.2</b>

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

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
Houston AA	198	30,462	26.5	13,800	87.3	40.4	46.8	4.7	27.8	7.9	31.8
Non-MSA AA	549	34,156	73.5	4,467	81.3	54.5	40.4	5.0	17.3	13.7	28.2
<b>Total</b>	<b>747</b>	<b>64,618</b>	<b>100.0</b>	<b>18,267</b>	<b>85.7</b>	<b>50.7</b>	<b>45.2</b>	<b>4.8</b>	<b>20.1</b>	<b>9.5</b>	<b>29.2</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 100.0%*

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
Houston A	287	44,670	27.3	38,685	89.4	35.2	45.1	3.6	30.7	7.0	34.1
Non-MSA AA	764	68,957	72.7	4,814	80.9	42.3	37.3	5.1	21.9	14.0	35.9
<b>Total</b>	<b>1,051</b>	<b>113,627</b>	<b>100.0</b>	<b>43,499</b>	<b>88.3</b>	<b>40.3</b>	<b>44.3</b>	<b>3.8</b>	<b>24.3</b>	<b>7.9</b>	<b>35.4</b>

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

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
Beaumont AA	401	49,995	17.5	--	82.2	37.4	--	4.9	28.2	12.9	34.4
DFW AA	780	99,058	34.1	--	88.1	39.5	--	3.6	33.2	8.3	27.3
Houston AA	279	44,439	12.2	--	90.7	36.6	--	3.0	34.8	6.3	28.7
Non-MSA AA	828	81,949	36.2	--	83.7	42.2	--	4.3	22.0	11.9	35.9
<b>Total</b>	<b>2,288</b>	<b>275,441</b>	<b>100.0</b>	<b>--</b>	<b>88.3</b>	<b>39.7</b>	<b>--</b>	<b>3.5</b>	<b>28.5</b>	<b>8.2</b>	<b>31.8</b>

*Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank 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>2017-18</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	
Beaumont AA	713	89,206	28.9	5,686	80.3	39.6	34.8	5.5	27.2	14.2	33.2	
DFW AA	1,751	207,512	71.1	74,268	86.5	44.7	42.8	4.2	30.7	9.3	24.6	
<b>Total</b>	<b>2,464</b>	<b>296,718</b>	<b>100.0</b>	<b>79,954</b>	<b>86.0</b>	<b>43.2</b>	<b>42.2</b>	<b>4.3</b>	<b>29.7</b>	<b>9.6</b>	<b>27.1</b>	
<i>Source: 2018 D&amp;B Data; 01/01/2017 - 12/31/2018 Bank Data; 2018 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>2017-19</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	
Abilene AA	1,520	186,763	75.1	3,096	81.9	46.9	34.3	5.1	30.4	13.0	22.7	
Odessa AA	18	3,265	0.9	3,376	80.9	44.4	24.3	6.4	16.7	12.7	38.9	
San Angelo AA	486	60,700	24.0	1,799	81.6	47.7	35.1	5.0	36.6	13.4	15.6	
<b>Total</b>	<b>2,024</b>	<b>250,728</b>	<b>100.0</b>	<b>8,271</b>	<b>81.4</b>	<b>47.1</b>	<b>30.4</b>	<b>5.5</b>	<b>31.8</b>	<b>13.0</b>	<b>21.1</b>	
<i>Source: 2019 D&amp;B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0%</i>												

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Houston AA	7	689	2.2	72	1.0	0.0	0.0	15.7	42.9	11.1	33.5	28.6	38.9	49.9	28.6	50.0	0.0	0.0	0.0
Non-MSA AA	312	20,487	97.8	1,037	0.0	0.0	0.0	11.2	11.9	10.3	48.8	51.3	50.0	40.0	36.9	39.6	0.0	0.0	0.0
<b>Total</b>	<b>319</b>	<b>21,176</b>	<b>100.0</b>	<b>1,109</b>	<b>0.4</b>	<b>0.0</b>	<b>0.0</b>	<b>13.1</b>	<b>12.5</b>	<b>10.4</b>	<b>42.5</b>	<b>50.8</b>	<b>49.3</b>	<b>44.0</b>	<b>36.7</b>	<b>40.3</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</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%*

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Houston AA	17	1,125	3.3	281	1.5	0.0	0.0	11.2	23.5	8.5	29.0	23.5	43.1	58.3	52.9	48.4	0.0	0.0	0.0
Non-MSA AA	496	38,539	96.7	1,208	0.0	0.0	0.0	11.7	12.9	11.2	48.6	53.4	52.2	39.6	33.7	36.7	0.0	0.0	0.0
<b>Total</b>	<b>513</b>	<b>39,664</b>	<b>100.0</b>	<b>1,489</b>	<b>0.9</b>	<b>0.0</b>	<b>0.0</b>	<b>11.4</b>	<b>13.3</b>	<b>10.7</b>	<b>36.6</b>	<b>52.4</b>	<b>50.4</b>	<b>51.0</b>	<b>34.3</b>	<b>38.9</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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

Assessment Area:	Total Loans to Farms			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans	% Farms	% Bank Loans
Beaumont AA	6	256	1.0	4.1	0.0	13.2	0.0	42.6	66.7	40.1	33.3	0.0	0.0
DFW AA	142	13,730	23.2	3.0	0.7	12.3	3.5	40.0	63.4	44.6	32.4	0.0	0.0
Houston AA	17	1,502	2.8	1.1	0.0	10.2	29.4	31.3	23.5	57.4	47.1	0.0	0.0
Non-MSA AA	447	32,822	73.0	0.0	0.0	10.6	11.0	49.3	56.2	40.1	32.9	0.0	0.0
<b>Total</b>	<b>612</b>	<b>48,310</b>	<b>100.0</b>	<b>2.2</b>	<b>0.2</b>	<b>11.6</b>	<b>9.6</b>	<b>39.6</b>	<b>57.0</b>	<b>46.6</b>	<b>33.2</b>	<b>0.0</b>	<b>0.0</b>

*Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Beaumont AA	6	312	3.1	73	4.1	0.0	0.0	13.1	0.0	8.2	44.4	66.7	35.6	38.4	33.3	56.2	0.0	0.0	0.0
DFW AA	304	22,809	98.9	897	3.0	0.3	0.8	11.6	3.6	8.5	43.6	57.9	53.2	41.7	38.2	37.6	0.0	0.0	0.0
<b>Total</b>	<b>310</b>	<b>23,121</b>	<b>100.0</b>	<b>970</b>	<b>3.1</b>	<b>0.3</b>	<b>0.7</b>	<b>11.8</b>	<b>3.5</b>	<b>8.5</b>	<b>43.7</b>	<b>58.1</b>	<b>51.9</b>	<b>41.4</b>	<b>38.1</b>	<b>39.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

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



<b>Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography</b>																			<b>2017-19</b>
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Abilene AA	423	24,746	78.7	264	0.0	0.0	0.0	7.2	1.9	1.9	56.0	75.9	75.8	36.7	22.0	22.3	0.2	0.2	0.0
Odessa AA	3	283	0.7	9	2.1	0.0	0.0	8.4	0.0	11.1	28.7	0.0	11.1	60.8	100.0	77.8	0.0	0.0	0.0
San Angelo AA	128	15,268	24.7	102	6.1	2.3	2.0	10.1	1.6	2.0	34.3	43.8	27.5	49.5	52.3	68.6	0.0	0.0	0.0
<b>Total</b>	<b>554</b>	<b>40,297</b>	<b>100.0</b>	<b>375</b>	<b>2.5</b>	<b>0.5</b>	<b>0.5</b>	<b>8.4</b>	<b>1.8</b>	<b>2.1</b>	<b>44.4</b>	<b>68.1</b>	<b>61.1</b>	<b>44.5</b>	<b>29.4</b>	<b>36.3</b>	<b>0.1</b>	<b>0.2</b>	<b>0.0</b>

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues</b>												<b>2017</b>
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Houston AA	7	689	2.2	72	96.5	57.1	52.8	1.3	0.0	2.2	42.9	
Non-MSA AA	312	20,487	97.8	1,037	94.5	74.7	59.0	3.7	2.2	1.8	23.1	
<b>Total</b>	<b>319</b>	<b>21,176</b>	<b>100.0</b>	<b>1,109</b>	<b>95.3</b>	<b>74.3</b>	<b>58.6</b>	<b>2.7</b>	<b>2.2</b>	<b>2.0</b>	<b>23.5</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 T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Houston AA	17	1,125	3.3	281	95.8	47.1	57.3	1.9	5.9	2.3	47.1
Non-MSA AA	496	38,539	96.7	1,208	93.7	49.2	51.6	4.0	6.3	2.3	44.6
<b>Total</b>	<b>513</b>	<b>39,664</b>	<b>100.0</b>	<b>1,489</b>	<b>95.0</b>	<b>49.1</b>	<b>52.7</b>	<b>2.8</b>	<b>6.2</b>	<b>2.3</b>	<b>44.6</b>
<i>Source: 2018 D&amp;B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.            Due to rounding, totals may not equal 100.0%</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Beaumont AA	6	256	1.0	--	98.9	33.3	--	0.9	16.7	0.2	50.0
DFW AA	142	13,730	23.2	--	96.2	57.0	--	2.1	7.0	1.7	35.9
Houston AA	17	1,502	2.8	--	96.3	35.3	--	1.7	11.8	1.9	52.9
Non-MSA AA	447	32,822	73.0	--	94.6	55.9	--	3.5	7.2	2.0	36.9
<b>Total</b>	<b>612</b>	<b>48,310</b>	<b>100.0</b>	<b>--</b>	<b>96.1</b>	<b>55.4</b>	<b>--</b>	<b>2.1</b>	<b>7.4</b>	<b>1.8</b>	<b>37.3</b>
<i>Source: 2019 D&amp;B Data; 01/01/2019 - 12/31/2019 Bank Data; "--" data not available.            Due to rounding, totals may not equal 100.0%</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Beaumont AA	6	312	1.9	73	98.7	50.0	63.0	0.9	0.0	0.4	50.0
DFW AA	304	22,809	98.1	897	95.4	55.9	48.8	2.4	7.9	2.1	36.2
<b>Total</b>	<b>310</b>	<b>23,121</b>	<b>100.0</b>	<b>970</b>	<b>95.7</b>	<b>55.8</b>	<b>49.9</b>	<b>2.3</b>	<b>7.7</b>	<b>2.0</b>	<b>36.5</b>

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

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2017-19
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Abilene AA	423	24,746	76.4	264	97.5	63.4	58.3	1.9	4.5	0.5	32.2
Odessa AA	3	283	0.5	9	96.5	0.0	11.1	0.7	0.0	2.8	100.0
San Angelo AA	128	15,268	23.1	102	96.2	84.4	59.8	2.3	5.5	1.4	10.2
<b>Total</b>	<b>554</b>	<b>40,297</b>	<b>100.0</b>	<b>375</b>	<b>96.9</b>	<b>67.9</b>	<b>57.6</b>	<b>1.9</b>	<b>4.7</b>	<b>1.1</b>	<b>27.4</b>

Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%