

## PUBLIC DISCLOSURE

August 20, 2018

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Anson Charter Number 6091

> 1021 12th Street Anson, TX 79501

Office of the Comptroller of the Currency

9003 Airport Freeway Suite 275 North Richland Hills, TX 76180-9127

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

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# **Overall CRA Rating**

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

The First National Bank of Anson's (FNB Anson or The Bank) CRA performance is satisfactory. We based our conclusions on the lending test. The major factors supporting the institution's rating include:

- The bank's loan-to-deposit ratio (LTD) is reasonable and reflects a willingness to lend within the bank's assessment area (AA) communities.
- The substantial majority of the bank's loan originations are inside the AA.
- The bank's lending to borrowers with different incomes and businesses of different sizes
  reflects excellent distribution and a commitment to lend to low- and moderate-income (LMI)
  individuals and small businesses.
- The overall geographic distribution of loans reflects reasonable distribution in LMI census tracts.
- There have been no complaints related to FNB Anson's CRA performance since the prior Public Evaluation was issued.

#### **Definitions and Common Abbreviations**

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

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

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

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

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; or loans, investments, and services that support, enable or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's assessment area(s) or outside the assessment area(s) provided the bank has adequately addressed the community development needs of its assessment area(s).

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder' and no wife present) or 'female householder' (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

# **Description of Institution**

FNB Anson is a single state, community bank located in Anson, TX. The bank is wholly owned by Anson Bancshares, Inc., a one bank holding company located in Anson and FNB Anson is the primary asset of the holding company. There are no other subsidiaries or affiliates. The bank has one main location in Anson and operates a deposit taking ATM in Hawley, TX, approximately 15 miles south of Anson and also in Jones County. The bank's AA includes all whole census tracts located within Jones County. The following table details the bank's branch and ATM distribution by geographic income level:

		Table C	C - Branch	and ATM	I Distrib	oution by (	Geograp	hy Incon	ne Level			
			Assessmen	t Area: F	NB Anso	on 2018 E	xam AA	Jones Co	)			
Tract Income Level	Census	s Tracts	Popula	ation	Bra	nches	AT	ΓMs	Open B	ranches	Closed I	Branches
	#	%	#	%	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Middle	4	66.7	11,630	58.2	1	100.0	2	100.0	0	0.0	0	0.0
Upper	1	16.7	1,134	5.7	0	0.0	0	0.0	0	0.0	0	0.0
NA	1	16.7	7,214	36.1	0	0.0	0	0.0	0	0.0	0	0.0
Totals	6	100.0	19,978	100.0	1	100.0	2	100.0	0	100.0	0	100.0

Source: 2015 ACS Census & Bank Data Due to rounding, totals may not equal 100.0

The bank's primary lending products include 1-4 family residential loans, commercial loans, and unsecured consumer loans. Other loan products are traditional and common for community banks of comparable size. Deposit products are also traditional including products for individuals and businesses. The bank's strategy is to provide consumer credit to the entire AA community and make commercial loans in the AA community within the constraints of a high level of competition in the AA and the bank's small size and lending limit. There was no merger or acquisition activity during the assessment period.

As of December 31, 2017, FNB Anson reported total assets of \$63.4 million, total loans of \$32.3 million or 50 percent of average assets, and total deposits of \$60 million. FNB Anson's Tier 1 Capital, an important measure of a bank's financial strength, totaled \$5.5 million, resulting in a Tier 1 Leverage Ratio of 8.48 percent relative to the peer group at 11.8 percent. The loan portfolio is diverse, including 1-4 family residential loans, representing 37 percent of the portfolio; commercial and industrial loans, representing 16 percent of the portfolio; other consumer loans, representing 12.4 percent of the portfolio; agricultural loans, representing 10.6 percent of the portfolio; municipal loans, representing 7.8 percent of the portfolio; farmland loans, representing 7 percent of the portfolio; auto loans, representing 6 percent of the portfolio; and nonfarm nonresidential loans, representing 2 percent of the portfolio.

There were no legal, financial or other factors impeding the bank's ability to help meet the credit needs in its AA during the assessment period. The prior CRA Performance Evaluation, dated January 7, 2013, concluded that bank's performance was satisfactory.

# **Scope of the Evaluation**

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

We completed a review of FNB Anson's CRA performance within its AA under the small bank examination procedures, which is solely based on the lending test. The evaluation period includes the full calendar years 2015, 2016, and 2017. Primary lending products reviewed include 1-4 family residential loans, commercial and industrial loans, and unsecured consumer loans. The assessment includes a review of demographic and economic data about the institution's AA, the institution's major business products and strategies, financial condition, capacity, and ability to lend or invest in its community. The review also includes gathering information from examinations of other institutions serving the same or similar assessment areas, reviewing information from other recent community contacts, and reviewing information about the AA developed cooperatively by the different agencies. Specific data included in the assessment includes data reported by the institution on the bank's Home Mortgage Disclosure Act (HMDA) Loan Application Register (LAR) for 1-4 family residential loans originated during the assessment period and data gathered from the institution's files for commercial and industrial loans and consumer loans originated during the assessment period.

#### **Data Integrity**

Prior to this evaluation, the accuracy of the data reported in the bank's 2015, 2016, and 2017 HMDA LARs was reviewed in May 2018. The review found the data to be reliable for all three years for the purpose of this assessment. Errors were isolated to the bank's reporting of borrower income and none of the errors resulted in borrowers being inaccurately reported as LMI.

### Selection of Areas for Full-Scope Review

The area primarily served by FNB Anson and designated as the bank's AA is the area consisting of all whole census tracts within Jones County making up the northern part of the Abilene MSA. It is allowable for the bank to designate only part of the MSA as its AA, given its size and location relative to the MSA. This assessment will include a full-scope review of the AA. The assessment does not include limited-scope reviews of any secondary AAs. Please refer to the table in Appendix A for more information.

# Ratings

The bank's overall rating is based solely on the area receiving a full scope review as the bank only has one AA, comprised of Jones County.

# **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 Consumer Financial Protection Bureau, as applicable.

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

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

# **Conclusions with Respect to Performance Tests**

As FNB Anson is a small bank, we only performed the lending test to determine compliance with the Community Reinvestment Act (CRA). The bank demonstrated satisfactory performance under the lending test and no CRA related complaints have been received since the prior CRA performance evaluation was issued.

The bank's LTD ratio is reasonable and meets the standard for satisfactory performance given the performance context. The bank's lending within its AA is satisfactory as the majority of loans were made inside the AA. The bank's lending to borrowers with different incomes and businesses of different sizes meets the standard for satisfactory performance with reasonable distribution to LMI individuals and businesses with gross revenues less than \$1 million. The bank's lending across areas with different incomes meets the standard for satisfactory performance with reasonable distribution of lending in LMI geographies considering the opportunities for lending in LMI geographies within the AA. The AA is primarily middle income; it had no low-income tracts during the assessment period and only one moderate-income tract during 2015-2016 which was changed to middle-income in 2017. Given the limited diversity of income tracts in the AA, we placed more reliance on the distribution of loans to low-and moderate income individuals and businesses with gross revenues less than \$1 million than on the geographic distribution of lending in determining that the bank's performance is satisfactory.

#### **LENDING TEST**

The bank demonstrated satisfactory performance under the lending test.

#### **Loan-to-Deposit Ratio**

FNB's average LTD ratio is reasonable and meets the standard for satisfactory performance.

The LTD ratio measures the extent to which the bank has returned the deposits it has received to the community in the form of loans. The average of such ratios for each quarter-end of the evaluation period was used to determine performance in this area. The average LTD ratio for FNB Anson during the evaluation period was 56.50 percent. The surrounding counties contain four other institutions which are similar in size to FNB Anson. During the same period, the average LTD ratios of these banks ranged from 43.11 percent to 92.39 percent. FNB Anson's LTD ratio is within the range of competing institutions. This ratio is reasonable and reflects satisfactory efforts to meet the credit needs of the community.

#### **Lending in Assessment Area**

The majority of the loans made during the assessment period were made inside the bank's AA. The distribution by dollar amount is impacted by large loans made to local individuals purchasing properties outside the bank's AA. Of the 284 loans totaling \$3.97 million the bank made in the three year assessment period, 77.1 percent by number and 39.7 percent by dollar volume were made inside the bank's AA. Considering the distribution by number of loans and by dollar amount, this meets the standard for satisfactory performance. The following table quantifies the proportion of the bank's lending that was inside the AA:

	Tab	le D - ]	Lend	ing Ins	ide and	Outside of t	he Ass	essment Are	a	
	Nu	mber o	of Lo	ans		Dollar Ar	nount	of Loans \$(0	00s)	
Loan Category	Ins	side	Ou	tside	Total	Inside	)	Outsid	e	Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage										
2015	29	78.4	8	21.6	37	2,312	77.9	656	22.1	2,968
2016	37	75.5	12	24.5	49	1,846	58.8	1,293	41.2	3,139
2017	18	78.3	5	21.7	23	895	71	365	29	1,260
Subtotal	84	77.1	25	22.9	109	5,053	68.6	2314	31.4	7,367
Consumer										
2015	25	86.2	4	13.8	29	36,124	81.0	8,450	19.0	44,574
2016	25	83.3	5	16.7	30	60,689	93.1	4,523	6.9	65,212
2017	22	75.9	7	24.1	29	98,285	45.0	120,345	55.0	218,630
Subtotal	72	81.8	16	18.2	88	195,099	59.4	133,318	40.6	328,416
Commercial										
2015	21	70.0	9	30.0	30	290,411	16.8	1,442,546	83.2	1,732,956
2016	22	73.3	8	26.7	30	356,273	42.9	473,850	57.1	830,123
2017	20	74.1	7	25.9	27	729,582	68.1	341,208	31.9	1,070,790
Subtotal	63	72.4	24	27.6	87	1,376,265	37.9	2,257,604	62.1	3,633,869
Total	219	77.1	65	22.9	284	1,576,417	39.7	2,393,236	60.3	3,969,653

Source: Evaluation Period: 1/1/2015 - 12/31/2017 Bank Data

Due to rounding, totals may not equal 100.0

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

The bank's lending to borrowers of different incomes and to businesses of different sizes reflects reasonable distribution.

#### Residential Real Estate Loans

The borrower distribution of residential real estate loans reflects satisfactory performance throughout the bank's AA.

During 2015 and 2016, 3 percent of mortgage loans were made to low-income borrowers, which is weaker than the proportion of low income families at 18.9 percent and comparable to the aggregate distribution of loans at 3.6 percent. Over the same period, 22.7 percent of mortgage loans were made to moderate-income borrowers, which is stronger than the proportion of moderate-income families at 20.7 percent and the aggregate distribution of loans at 18.6 percent.

Table P: A	Asse	ssment	Area	Distrib	ution of	Home	Mortgag	e Loans	by Inc	come Cat	egory of	the B	orrower						2015-16
	Tota	ıl Home	Mortgag	ge Loans	Low-In	come B	orrowers		lerate-Ii Borrowe		Middle-I	ncome l	Borrowers	Upper-I	ncome I	Borrowers		ailable Borrowe	-Income ers
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Jones County	66	4,158	100.0	253	18.9	3.0	3.6	20.7	22.7	18.6	25.2	30.3	23.3	35.3	42.4	37.2	0.0	3.4	17.4
Total	66	4,158	100.0	253	18.9	3.0	3.6	20.7	22.7	18.6	25.2	30.3	23.3	35.3	42.4	37.2	0.0	3.4	17.4
Source: 2010	U.S (	Census; (	01/01/201	15 - 12/31	/2016 Bani	k Data, 2	2016 HMDA	Aggregate	Data, '	'" data not	available.								

Due to rounding, totals may not equal 100.0

In 2017, 22.2 percent of bank loans were to low-income individuals, which is stronger than the aggregate at 4.6 and comparable to the proportion of low income families at 23.1 percent. During the same period, 11.1 percent of mortgage loans were to moderate-income individuals which is below the proportion of moderate-income families, but comparable to the aggregate group at 12.6 percent.

Table P: A	Asses	ssmer	t Area	Distrib	oution of	Home	e Mortgaș	ge Loans	by In	come Cat	tegory of	the B	orrower						2017
	Т		ome Moi Loans	rtgage	Low-In	come B	orrowers		lerate-Ii Borrowe		Middle-I	ncome 1	Borrowers	Upper-I	ncome I	Borrowers		vailable Borrowe	-Income ers
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Jones County	18	895	100.0	285	23.1	22.2	4.6	18.2	11.1	12.6	21.2	33.3	26.7	37.5	33.3	41.1	0.0	0.0	15.1
Total Source: 2015			100.0		<b>23.1</b>	22.2	<b>4.6</b>	18.2	11.1	12.6	21.2	33.3	<b>26.7</b>	<b>37.5</b>	33.3	41.1	0.0	0.0	15.1

#### Small Business Loans

Borrower distribution of small business loans is excellent. The bank's lending to business with gross revenues less than \$1 million represented 85.7 percent of the loans we tested. This is significantly higher than the 31.7 percent reported by the aggregate and also higher than the 78.8 percent of businesses in the area that reported gross revenues less than \$1 million. This performance reflects the bank's commitment to lend to small businesses. It is also notable that all of the loans we sampled were originated for less than \$1 million which further supports the conclusion that the majority of the bank's business loans were made to small businesses in the area.

Table R: Assess	sment A	rea Dist	tribution	n of Loans	to Small Bus	sinesses b	y Gross Anı	nual Revenue	es	2015-17	
	Tota	l Loans	to Smal	l	Businesses v	vith Reve	enues <=	Businesses v	with	Businesses v	with
	Busi	nesses			1MM			Revenues >	1MM	Revenues N	ot
										Available	
Assessment	#	\$	% of	Overall	%	%	Aggregate	%	<b>%</b>	%	<b>%</b>
Area:			Total	Market	Businesses	Bank		Businesses	Bank	Businesses	Bank
						Loans			Loans		Loans
Jones County	63	1,248	28.51	221	78.8	85.71	31.7	4.8	14.29	16.4	0
Total	63	1,248	28.51	221	78.8	85.71	31.7	4.8	14.29	16.4	0
Source: 2017 D&B I	Data; 01/	01/2015 -	12/31/201	7 Bank Data	; 2016 CRA Agg	regate Date	a; Due to round	ing, totals may n	ot equal 10	00.0	

#### Consumer Loans

Borrower distribution of consumer loans reflects excellent distribution. Of the loans we sampled from 2015, 2016, and 2017, 43 percent were made to individuals classified as low-income and another 15.3 percent were made to individuals classified as moderate-income. This level of lending to LMI individuals exceeds the standard for satisfactory performance and demonstrates the bank's commitment to lending to qualified borrowers with different income levels. Additionally, the size of the loans we sampled supports the bank's commitment to make small loans that meet the needs of individuals in the community. The average origination amount for consumer loans originated in the evaluation period was \$3,144 and 223 of the 1,333 loans originated during the period had origination amounts less than \$500.

Table	<b>V</b> - A	Assessmen	t Area	Distribution o	f Consu	mer Loans by	Income	Category of the	he Borro	wer		2015-17	
	Tot Loa	al Consu ins	mer	Low-Income Borrowers		Moderate-In Borrowers	come	Middle-Inco Borrowers	me	Upper-Incom Borrowers	ne	Not Availabl Income Borr	
Year	#	\$(000)s	% of	% of	%	% of	%	% of	%	% of	%	% of	%
			Total	Households	Bank	Households	Bank	Households	Bank	Households	Bank	Households	Bank
					Loans		Loans		Loans		Loans		Loans
2015	25	36	18.5	24.5	52.0	17.5	8.0	18.4	20.0	39.6	0.0	0.0	20.0
2016	25	61	31.3	24.5	32.0	17.5	16.0	18.4	12.0	39.6	16.0	0.0	24.0
2017	22	98	50.3	26.9	45.0	14.1	23.0	19.7	18.0	39.3	14.0	0.0	0.0
Total	72	195	100	25.3	43.1	16.4	15.3	18.8	16.7	39.5	9.7	0	15.3
Source	. 201	10  HS  Co	neue. 21	015 ASC Censu	us 01/01/	2015 - 12/31/2	017 Rank	Z Data: Due to	rounding	a totals may n	ot equal	100.0	

Source: 2010 U.S. Census; 2015 ASC Census 01/01/2015 - 12/31/201/ Bank Data; Due to rounding, totals may not equal 100.0

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

The bank's lending in LMI geographic areas reflects reasonable distribution throughout the AA. There were no gaps or areas of low penetration in the bank's lending patterns.

#### Residential Real Estate Loans

The geographic distribution of residential real estate loans in the bank's AA is satisfactory. Given the AA is primarily made up of census tracts classified as middle-income, the opportunity to lend in low-and moderate-income tracts within the AA is limited.

In 2015 and 2016, 7.6 percent of the home mortgage loans the bank made were for properties located in moderate-income tracts; this is significantly lower than the 21.4 percent of the owner occupied housing units located in these tracts, but only slightly lower than 10.3 percent of loans the aggregate reported. In 2017, none of the tracts within the AA were classified as low-or moderate-income. The following table illustrates the bank's performance across the different income geographies relative to the percent of owner occupied housing units and peer performance in the areas.

	7	Fotal Ho	me Moi Loans	tgage	Low-l	Income	Tracts	Moderat	te-Incor	ne Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Av	ailable Tracts	Income
Assessment Area:	#	\$		Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate
Jones County	66	4,158	100.0	253	0.0	0.0	0.0	21.4	7.6	10.3	67.6	92.4	72.3	11.0	0.0	17.4	0.0	0.0	0.0
Total	66	4,158	100.0	253	0.0	0.0	0.0	21.4	7.6	10.3	67.6	92.4	72.3	11.0	0.0	17.4	0.0	0.0	0.0

	To		ome Mo Loans	rtgage	Low-l	Income	Tracts	Moderat	te-Incor	ne Tracts	Middle	-Income	Tracts	Upper-	Income	Tracts	Not Av	ailable- Tracts	Income
Assessment Area:	#	\$		Overall Market	_	% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate
Jones County	18	895	100.0	285	0.0	0.0	0.0	0.0	0.0	0.0	88.3	94.4	84.9	11.7	5.6	15.1	0.0	0.0	0.0
Total	18	895	100.0	285	0.0	0.0	0.0	0.0	0.0	0.0	88.3	94.4	84.9	11.7	5.6	15.1	0.0	0.0	0.0
Source: 2010	US (	Census	; 2015 A	CS Censi	us; 01/01/20	015 - 12/	/31/2017 Bai	nk Data, 20	17 HMI	OA Aggregat	e Data; Du	e to rour	ıding, totals	may not eq	ual 100.	0			

#### **Small Business Loans**

Geographic distribution of small business loans in the bank's AA is satisfactory. The bank's small business lending during the assessment period reflects reasonable distribution given that the AA is primarily made up of census tracts classified as middle-income limiting the opportunity to lend in LMI tracts within the AA. While the bank's performance in moderate income tracts is significantly lower than the percent of small business located in these tracts, the aggregate also reported no loans in these areas indicating a lack of demand for lending from qualified borrowers.

Table Q:	Ass	sessmen	t Are	a Distr	ibution of	f Loan	s to Sma	ll Busines	ses by	Income (	Category	of the	Geograp	hy					2015-17
	7	Fotal Loa Busi	ns to S nesses		Low-I	ncome '	Γracts	Moderat	e-Incon	ne Tracts	Middle-	Income	Tracts	Upper-l	íncome	Tracts	Not Availa	ble-Inco	ome Tracts
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Jones County	63	1,248	100	221	0.0	0	0.0	16.6	0	0.0	71.1	98.4	80.1	11.8	1.6	19.9	0.5	0	0.0
Total	63	1,248	100	221	0.0	0	0.0	16.6	0	0.0	71.1	98.4	80.1	11.8	1.6	19.9	0.5	0	0.0
Source: 2017	7 D&	B Data; (	01/01/2	015 - 12/3	31/2017 Ban	k Data1	/1/2015-12/.	31/2017; 201	6 CRA	Aggregate L	Data; Due to	roundin	g, totals ma	y not equal 1	00.0				

#### **Consumer Loans**

Geographic distribution of loans in the AA is satisfactory. The bank's consumer lending during the assessment period reflects reasonable distribution given that the AA is primarily made up of census tracts classified as middle-income limiting the opportunity to lend in LMI tracts within the AA. In 2015 and 2016, only one of the tracts in the AA was classified as moderate income and in 2017 there were no LMI tracts in the AA. Of the consumer loans we sampled during this assessment, none were to individuals in this moderate-income tract. It is notable that the one tract that was classified as moderate-income in 2015-2016 is located in the northern part of the county and includes the city of Stamford, TX, approximately 15 miles from FNB Anson's single branch location. It is reasonable that individuals seeking unsecured consumer credit would apply at one of the three competing banks located in Stamford rather than travel to FNB Anson.

Table	<b>U</b> : A	Assessment	t Area Distrib	ution of	Consumer Lo	ans by I	ncome Catego	ry of the	Geography		2015-17	
	Tot Cor Loa	nsumer	Low-Income	Tracts	Moderate-In Tracts	come	Middle-Inco Tracts	me	Upper-Incom Tracts	ne	Not Availabl Income Trac	
Year	#	\$	% of Households	% Bank	% of Households	% Bank	% of Households	% Bank	% of Households	% Bank	% of Households	% Bank
			Households	Loans	Households	Loans	Households	Loans	Householus	Loans	Households	Loans
2015	25	36	0	0	24.6	0	64.7	100	10.8	0	0	0
2016	25	61	0	0	24.6	0	64.7	100	10.8	0	0	0
2017	22	98	0	0	0	0	89.4	95.4	10.6	4.5	0	0
Source	2: 20	10 U.S Cer	isus; 2015 ACS	Census	01/01/2015 - 12	2/31/201	7 Bank Data.;	Due to re	ounding, totals	may not	equal 100.0	•

Responses to Complaints
There have been no CRA related complaints since the prior Public Evaluation was issued.

# **Appendix A: Scope of Examination**

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

Time Period Reviewed	Lending Test (exclude	es CD loans): (1/1/2015 to 12/31/2017)
Financial Institution		Products Reviewed
FNB Anson Anson, Texas		HMDA reportable 1-4 Family Loans Consumer Unsecured Loans Commercial Loans categorized as C&I
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None	None
List of Assessment Areas and Ty	/pe of Examination	
Assessment Area	Type of Exam	Other Information
Jones County, Texas, within the Abilene, Texas MSA	Full Scope	All whole census tracts within Jones County

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

Table A – 2017 Demographic Information of the Assessment Area									
Assessment Area: FNB Anson 2018 Exam AA Jones Co									
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #			
Geographies (Census Tracts)	6	0.0	0.0	66.7	16.7	16.7			
Population by Geography	19,978	0.0	0.0	58.2	5.7	36.1			
Housing Units by Geography	7,330	0.0	0.0	89.8	10.2	0.0			
Owner-Occupied Units by Geography	4,180	0.0	0.0	88.3	11.7	0.0			
Occupied Rental Units by Geography	1,309	0.0	0.0	93.0	7.0	0.0			
Vacant Units by Geography	1,841	0.0	0.0	90.9	9.1	0.0			
Businesses by Geography	902	0.0	0.0	87.8	11.5	0.7			
Farms by Geography	155	0.0	0.0	91.6	8.4	0.0			
Family Distribution by Income Level	3,729	23.1	18.2	21.2	37.5	0.0			
Household Distribution by Income Level	5,489	26.9	14.1	19.7	39.3	0.0			
Median Family Income MSA - 10180 Abilene, TX MSA \$56,44		\$56,448	Median Housing Value		\$66,531				
Median Gross Rent						\$664			
Families Below Poverty Level					ty Level	17.2%			

Source: 2015 ACS Census and 2017 D&B Data Due to rounding, totals may not equal 100.0

(\*) The NA category consists of geographies that have not been assigned an income classification.

Table B – Median Family Income Ranges								
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%				
Abilene, TX MSA Median Family Income (10180)								
2015 (\$57,700)	<\$28,850	\$28,850 to <\$46,160	\$46,160 to <\$69,240	≥\$69,240				
2016 (\$58,000)	<\$29,000	\$29,000 to <\$46,400	\$46,400 to <\$69,600	≥\$69,600				
2017 (\$56,100)	<\$28,050	\$28,050 to <\$44,880	\$44,880 to <\$67,320	≥\$67,320				
Source: FFIEC								

Source: FFIEC

Due to rounding, totals may not equal 100.0

FNB Anson has identified one AA. The AA consists of all whole census tracts located in Jones County, TX. The majority of the bank's activity is conducted within this AA; the bank has one branch location and an ATM location in Anson, TX and one ATM location in Hawley, TX. All of FNB Anson's physical locations are located inside the AA. The bank does not have any non-contiguous AAs and does not operate in any multi-state MSAs. Competition in the AA is moderate with 38.7 percent of the market share held by FNB Anson according to the FDIC Market Share Report based on information as of June 30, 2017. Vista bank was second to FNB Anson with 26.8 percent of the deposit market followed by First Bank Texas and Compass Bank with 19.11 percent and 15.42 percent of the market, respectively.

There was one community contact conducted in 2017 and we conducted one community contact in conjunction with this assessment. The contacts did not provide any indication that FNB Anson is not meeting the needs of its AA communities. The contacts characterized the economic conditions as stagnant with unemployment numbers highly correlated to the oil field and occupancy of local prison facilities. Both noted affordable housing as a community credit need because the City of Anson has demolished approximately 130 dwellings within its city limits since 2015 and new homes have not been built to replace them. Other community credit needs noted were small business lending and general consumer loans. One contact noted the presence of alternative lending institutions such as pay day lenders, pawn shops, and check cashing services in nearby Abilene, TX and identified small, unsecured consumer loans for individuals with no or poor credit to cover unexpected personal expenses as a community credit need.