



PUBLIC DISCLOSURE

July 18, 2016

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Community Bank, National Association
Charter Number 16809

1151 West Highway 77
San Benito, TX 78586

Office of the Comptroller of the Currency
Southern District
San Antonio Field Office
10001 Reunion Place, Suite 250
San Antonio, TX 78216-4165

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, nor should it 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.

INSTITUTION'S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

First Community Bank's (FCB) CRA performance depicts a practice of providing for the credit needs of its assessment areas (AAs). The following factors support this rating:

- The loan-to-deposit (LTD) ratio meets the standard for satisfactory performance. The LTD ratio is reasonable in relation to similar situated banks averaging 70 percent since the last evaluation.
- Lending in the AA is outstanding as a substantial majority of the bank's loans are inside the AAs.
- The bank's loan portfolio reflects a reasonable penetration of residential real estate (RRE) loans among families of various income levels and loans to businesses of different sizes.
- The geographic distribution of the bank's RRE and business loans is satisfactory. The loans made within Hidalgo County and Willacy County reflects reasonable dispersion.
- The bank's community development (CD) performance is outstanding as it demonstrates excellent responsiveness to CD needs in its AAs, through CD lending, investments, and services.

Scope of Examination

We evaluated FCB's CRA performance under the Intermediate Small Bank (ISB) examination procedures, which include a lending and a community development test. We used financial information as of June 30, 2016, and used an evaluation period from January 1, 2014, to March 31, 2016.

We reviewed residential mortgage loans subject to reporting under the Home Mortgage Disclosure Act (HMDA) and a random sample of business loans, the bank's primary loan product, originated during the evaluation period. As a previous data integrity examination for HMDA determined that the data was reliable, we used the reported information for all residential loan analysis. We also reviewed a sample of 67 total business loans in the three assessment areas. Lending performance for loans to businesses received the most weight in determining ratings since this is the major loan product of the bank and represents over 50 percent of the total loan portfolio as of March 31, 2016. Our evaluation of CD activities included CD loans, investments, and services for the entire evaluation period.

Description of Institution

FCB is an intrastate bank headquartered in San Benito, Texas. As of June 30, 2016, FCB had total assets of \$341 million and Tier 1 leverage capital of 8.56 percent. It is a wholly-owned subsidiary of First San Benito Bancshares Corporation, a one-bank holding company based in San Benito, Texas. FCB does not have any other operation subsidiaries or affiliates that affect its capacity to lend or invest in the community. FCB offers 8 full service banking offices as well as a drive-thru location. The bank has branches located in San Benito, Harlingen, Los Fresnos, Brownsville, Raymondville, South Padre Island, and McAllen. The bank also offers ATM services at all of its locations within its AAs. We did not identify any legal or financial circumstances that impeded the bank's ability to help meet the credit needs in its AAs.

FCB offers a full range of deposit and loan products and services as well as online and mobile banking. In addition, other products and services the bank offers include individual retirement accounts, health savings accounts, and other financial products. While the bank offers a variety of products, commercial or business lending remains the primary lending focus of the bank. As of June 30, 2016, net loans represent 68 percent of total assets. Commercial real estate and commercial loans totaled 61 percent of loans. As of June 30, 2016, FCB reported total loans of \$235 million. The loan portfolio composition is as follows:

Loan Portfolio Composition		
Loan Category	\$000s	%
Residential Real Estate Loans	36,195	15%
Commercial Loans	37,281	15%
Commercial Real Estate Loans	104,403	45%
Construction & Land Development Loans	34,665	15%
Agricultural Loans	13,293	6%
Consumer Loans	6,107	3%
Other Loans	2,642	1%
Total	234,545	100%

Source: Quarterly call report data

The previous CRA Performance Evaluation, dated November 21, 2011, reflected a satisfactory rating. The bank has since expanded its assessment areas to include Hidalgo and Willacy Counties in addition to Cameron County. Additionally, the bank's asset size has exceeded the threshold to be examined under "small bank" CRA examination procedures and will be evaluated under the "intermediate small bank" procedures which includes the Community Development Test. Also, in 2013, FCB acquired South Padre Bank, N.A. and converted it into a banking center. The newest of the bank's branches is its McAllen location, a new full service banking center with five drive-thru lanes that opened in early 2016.

Description of Assessment Area(s)

Cameron County Assessment Area

The Cameron County AA is comprised of all census tracts (CTs) located in the Brownsville-Harlingen-San Benito Metropolitan Statistical Area (MSA). The AA meets the requirements of the regulations and does not arbitrarily exclude low- and moderate-income (LMI) areas. FCB operates six branches in the AA that offer a full-range of banking products and services with primary focus on loans to small businesses. The bank continues to face strong competition from branches of multinational, regional, and local banking companies.

Please refer to the following chart for demographic information of the AA.

DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS CAMERON COUNTY ASSESSMENT AREA 2010 CENSUS	
<i>Population</i>	
Number of Persons	406,220
Number of Families	91,493
Number of Households	113,547
<i>Geographies</i>	
Number of Census Tracts	86
% Low-Income Census Tracts	3.49%
% Moderate-Income Census Tracts	32.56%
% Middle-Income Census Tracts	40.70%
% Upper-Income Census Tracts	20.93%
<i>Median Family Income (MFI)</i>	
2010 MFI for AA	\$33,770
2010 HUD-Adjusted MFI	\$36,000
<i>Economic Indicators</i>	
Unemployment Rate	3.88%
Weighted Average of Median Housing Value	\$84,725
% of Owner-occupied Properties	55.95%
% of Households Below Poverty Level	31.14%

Source: 2010 US Census Data

Hidalgo County Assessment Area

Hidalgo County is comprised of all CTs in the McAllen-Edinburg-Mission MSA located in South Texas. Based on US Census data, the population of the county is 774,769. The median family income was \$34,106 with 33.5 percent of persons in the county in poverty. Major employers in the AA include the independent school districts of McAllen, Edinburg, Mission, Weslaco, and Pharr, local hospitals and medical centers, the University of Texas Rio Grande Valley, South Texas College, Walmart, and grocery stores.

Please refer to the following chart for demographic information of the AA.

DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS HIDALGO COUNTY ASSESSMENT AREA 2010 CENSUS	
<i>Population</i>	
Number of Persons	774,769
Number of Families	170,503
Number of Households	205,971
<i>Geographies</i>	
Number of Census Tracts	113
% Low-Income Census Tracts	0.88%
% Moderate-Income Census Tracts	30.97%
% Middle-Income Census Tracts	42.48%
% Upper-Income Census Tracts	23.89%
<i>Median Family Income (MFI)</i>	
2010 MFI for AA	\$34,106
2010 HUD-Adjusted MFI	\$35,000
<i>Economic Indicators</i>	
Unemployment Rate	4.48%
Weighted Average of Median Housing Value	\$78,900
% of Owner-occupied Properties	67.90%
% of Households Below Poverty Level	42.43%

Source: 2010 US Census Data

Willacy County Assessment Area

Willacy County is located in South Texas and is adjacent to both Cameron and Hidalgo County. The most populated city in the county is Raymondville. The population of the county as of 2010 was 22,134. The median family income was \$25,143 with a poverty rate of 38.8 percent. Major employers in the AA include local independent school districts, correctional facilities, grocery stores, restaurants.

In 2015, the Willacy County Correctional Center in Raymondville was closed due to a riot that occurred at the facility earlier in the year and resulted in almost 400 individuals being laid off. Additionally, the Walmart that was located in Raymondville closed its doors in January 2016 resulting in layoffs of just under 150 employees. Willacy County is at the top of the state's unemployment rate with an average annual unemployment rate of 14.7 percent between 2011 and 2015. The unemployment rate for the state of Texas as of June 2016 was 4.5 percent.

Please refer to the following chart for demographic information of the AA.

DEMOGRAPHIC AND ECONOMIC CHARACTERISTICS WILLACY COUNTY ASSESSMENT AREA 2010 CENSUS	
<i>Population</i>	
Number of Persons	22,134
Number of Families	4,419
Number of Households	5,485
<i>Geographies</i>	
Number of Census Tracts	5
% Low-Income Census Tracts	40.00%
% Moderate-Income Census Tracts	60.00%
% Middle-Income Census Tracts	0%
% Upper-Income Census Tracts	0%
<i>Median Family Income (MFI)</i>	
2010 MFI for AA	\$25,143
2010 MSA HUD-Adjusted MFI	\$51,600
<i>Economic Indicators</i>	
Unemployment Rate	2.74%
Weighted Average of Median Housing Value	\$48,886
% of Owner-occupied Properties	55.35%
% of Households Below Poverty Level	41.71%

Source: 2010 US Census Data

Community Contacts

As part of this evaluation, we determined the community credit needs in FCB's AAs by reviewing the CRA Public Evaluations of other banks operating in the same areas and conducting an interview with a community contact who works with a not-for-profit organization focusing on community services. The contact indicated there is a need to provide credit assistance to LMI individuals for residential loans. The contact noted that banks in the area could work more with the not-for-profit organizations in the area that cater to LMI families.

Conclusions with Respect to Performance Tests

LENDING TEST

FCB's performance under the Lending Test is rated "Satisfactory".

Loan-to-Deposit Ratio

FCB's LTD ratio is reasonable and meets the standard for satisfactory performance given its asset size, financial condition, and lending opportunities within its AAs.

The quarterly average LTD ratio since the last examination is 65 percent. While this ratio has declined from the 72 percent reported at the previous CRA examination, FCB's average LTD ratio remains comparable to other similarly situated banks.

Institution	Total Assets (000's)	Average LTD Ratio
Rio Bank	286,289	71.43
Texas Regional Bank	596,030	65.87
First Community Bank, N.A.	338,302	64.53
International Bank of Commerce	991,133	62.09
First National Bank of South Padre Island	60,627	45.73

Source: Quarterly call report data; average LTD based on data from September 2011 to March 2016

Lending in Assessment Area

FCB originates a substantial majority of loans within its AAs. A total of 94 percent number of loans and 95 percent dollar volume of loans were originated within its AAs. We reviewed a sample of business loans originated during the assessment period and also used aggregate reported loans from HMDA data during the assessment period to determine these percentages. Refer to the following table for more information.

Lending in Assessment Area										
Loan Type	Number of loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		#	%	#	%	
Home Purchase	70	97.22%	2	2.78%	72	\$19,694	99.4%	\$119	0.6%	\$19,813
Home Improvement	5	71.43%	2	28.57%	7	\$473	87.92%	\$65	12.08%	\$538
Refinance	35	100%	0	0%	35	\$13,694	100%	\$0	0%	\$13,694
Total Residential	110	96.49%	4	3.51%	114	\$33,861	99.46%	\$184	0.54%	\$34,045
Business	60	89.55%	7	10.45%	67	\$31,667	90.02%	\$3,511	9.98%	\$35,178
Total All Loans	170	93.92%	11	6.08%	181	\$65,528	94.66%	\$3,695	5.34%	\$69,223

Source: Data reported under HMDA, Loan sample

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

FCB's lending to borrowers of different incomes and to businesses of different sizes is reasonable and considered satisfactory.

We reviewed residential real estate and business loans in our analysis; however, the most weight was given to business loans since this is the bank's primary loan product as the volume was higher than other products. As of June 30, 2016, business loans and residential real estate loans comprises 75 percent and 15 percent of total loans, respectively.

Cameron County Assessment Area

Residential Real Estate Loans

FCB’s distribution of residential loans among LMI borrowers is lower than comparative demographics with poor penetration. Due to the heightened requirements from recent changes to mortgage regulations, the bank has discontinued RRE, owner-occupied lending for borrowers intending to use the RRE as a primary residence. The focus on RRE lending is now primarily for investment type purpose loans which are not subject to these regulations. While HMDA data shows that the majority of the distribution of these loans were made to borrowers in the middle and upper income level, this is due to a combination of the bank’s underwriting guidelines for these types of loans as well as an increase of loans made from the recently acquired South Padre Island branch. Given that the bank’s primary loan product is business loans, less weight was given to penetration performance for residential loan products.

Borrower Distribution of Residential Real Estate Loans in Cameron County AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans	% of AA Families	% of Number of Loans
Home Purchase	24.34	0.00	15.96	0.00	17.55	12.50	42.14	87.50
Home Improvement	24.34	0.00	15.96	0.00	17.55	0.00	42.14	100.00
Refinance	24.34	0.00	15.96	0.00	17.55	0.00	42.14	100.00

Source: Data reported under HMDA; U.S. Census data.

Business Loans

The distribution of loans to small businesses reflects reasonable distribution among businesses of different sizes. The loan sample of 24 loans reflected the bank originated 73 percent of these loans to businesses with revenues less than \$1 million by number and 77 percent by loan dollar volume. This is comparable to the AA demographic information which reports 75 percent of reported information have less than \$1 million in gross revenues.

Borrower Distribution of Loans to Businesses in Cameron County AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	74.68	3.74	21.58	100%
% of Bank Loans in AA by #	72.73	27.27	0.00	100%
% of Bank Loans in AA by \$	77.17	22.83	0.00	100%

Source: Loan sample; Dunn and Bradstreet data.

Hidalgo County Assessment Area

Residential Real Estate Loans

FCB did not meet the standard for the borrower distribution of RRE loans in Hidalgo County. The demographic data reflects that 25.27 percent and 15.52 percent of RRE loans were made to low- and moderate-borrowers, respectively; however, the reported data shows that the bank had only made 12.5 percent of loans to borrowers with low-income and none were reported to borrowers at the moderate-income level. Although the bank shows poor performance in relation to the demographic information, there was a significant amount of income information that was not available for RRE loans.

Borrower Distribution of Residential Real Estate Loans in Hidalgo County AA								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans	% of AA Families	% of # of Loans
Home Purchase	25.27	12.50	15.52	0.00	16.77	0.00	42.44	50.00
Home Improvement	25.27	0.00	15.52	0.00	16.77	0.00	42.44	0.00
Refinance	25.27	0.00	15.52	0.00	16.77	0.00	42.44	40.00

Source: Data reported under HMDA; U.S. Census data.

Note: No income information was available for 37.5 percent of Home Purchase loans and 60 percent of Refinance loans reported by the bank.

Business Loans

The bank's distribution of loans to small businesses reflects reasonable penetration in the Hidalgo County AA. Our sample of 22 loans reflected the bank originated 70 percent of loans to businesses with revenues less than \$1 million by number of loans. This meets the standards shown in the demographic information which reports 77.76 percent of the businesses have less than \$1 million in gross revenues.

Borrower Distribution of Loans to Businesses in Hidalgo County Assessment Area				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	77.76	3.39	18.85	100%
% of Bank Loans in AA by #	70.00	30.00	0	100%
% of Bank Loans in AA by \$	49.15	50.85	0	100%

Source: Loan sample; Dunn and Bradstreet data.

Willacy County Assessment Area

Residential Real Estate Loans

No weight was given to the performance for RRE loans as the bank did not originate any of this type of loan in the AA during the evaluation period.

Business Loans

FCB distribution of loans to small businesses and small farms reflects reasonable penetration among businesses of different sizes. Our sample of 21 loans reflected the bank originated 90 percent of these loans to businesses with revenues with less than \$1 million by number of loans but only 30.42 percent by dollar volume of loans. While the number of loans significantly exceeds the AA demographic information which reports 66.22 percent of businesses with less than \$1 million in gross revenues, the dollar volume of loans does not meet this standard, but the overall distribution remains reasonable.

Borrower Distribution of Loans to Businesses in Willacy County AA				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/ Unknown	Total
% of AA Businesses	66.22	3.89	29.90	100%
% of Bank Loans in AA by #	90.00	10.00	0	100%
% of Bank Loans in AA by \$	30.42	69.58	0	100%

Source: Loan sample; Dunn and Bradstreet data.

Geographic Distribution of Loans

The overall geographic distribution of loans reflects reasonable dispersion given the bank’s performance context and is consistent with safe and sound operations. Although the bank did not meet reasonable dispersion in all of its AAs, FCB met the standards for satisfactory performance under this criteria given the bank’s product offerings and overall business strategy. Since the bank’s primary loan product is business loans, which is a primary credit need of the community, the majority of the bank’s AAs reflect reasonable dispersion of business loans and outweighs the AA that reflects poor dispersion.

Cameron County Assessment Area

Residential Real Estate Loans

FCB’s geographic distribution of total RRE loans reflects poor dispersion throughout the AA. Demographic data reflects low- and moderate-census tract income levels of 0.98 percent and 23.62 percent, respectively; however, the vast majority of its originations for home purchases and all home improvement and refinances were made in the middle- to upper-income census tracts.

Geographic Distribution of Residential Real Estate Loans in Cameron County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	0.98	3.13	23.62	6.25	47.54	28.13	27.83	62.50
Home Improvement	0.98	0.00	23.62	0.00	47.54	66.67	27.83	33.33
Refinance	0.98	0.00	23.62	0.00	47.54	57.14	27.83	42.86

Source: Dunn & Bradstreet data; 2010 US Census

Business Loans

The bank’s geographic distribution of loans to businesses in the AA reflects poor dispersion throughout the AA and does not meet the standards for satisfactory performance. The following table shows that demographic data shows LMI census tracts reflecting 3.83 percent and 27.51 percent of businesses, respectively. FCB did not make any loans in the low-income census tracts and only 3.74 percent in the moderate-income census tracts.

Geographic Distribution of Loans to Businesses in Cameron County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans	% of AA Businesses	% of Number of Loans
% of Total	3.83	0.00	27.51	3.74	36.97	55.78	31.38	40.47

Source: Dunn & Bradstreet data; 2010 US Census

Hidalgo County Assessment Area

Residential Real Estate Loans

FCB’s geographic distribution of RRE loans reflects reasonable dispersion throughout the AA. The bank’s geographic dispersion of home purchase and refinance loans met the AA’s demographic data as shown in the following chart. No weight was given to home improvement as the bank did not originate any of these types of loans in the AA during the evaluation period.

Geographic Distribution of Residential Real Estate Loans in Hidalgo County Assessment Area								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans	% of AA Owner Occupied Housing	% of Number of Loans
Home Purchase	0.59	0.00	28.50	25.00	42.22	50.00	28.69	25.00
Home Improvement	0.59	0.00	28.50	0.00	42.22	0.00	28.69	0.00
Refinance	0.59	0.00	28.50	20.00	42.22	30.00	28.69	50.00

Source: Data reported under HMDA; U.S. Census data.

Business Loans

The following table shows the geographic distribution of loans to businesses in the Hidalgo County AA. Based on our loan sample, the geographic distribution of these loans reflects reasonable dispersion as the bank’s percent of LMI loans compares similarly to demographic data.

Geographic Distribution of Loans to Businesses in Hidalgo County Assessment Area								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans	% of AA Businesses	% of # of Loans
Businesses	0.41	5.00	22.72	10.00	36.21	30.00	40.54	55.00

Source: Loan sample; Dunn and Bradstreet data.

Willacy County Assessment Area

Residential Real Estate Loans

Geographic analysis of RRE loans in the AA is impractical as the bank did not originate any of these loans in the AA during the evaluation period.

Business Loans

The geographic distribution of loans reflects a reasonable dispersion throughout the AA when compared to area demographics. Though the bank made 100 percent of its loans to LMI census tracts in the AA, this meets the standard for satisfactory performance in the AA as demographic information shows that all of the census tracts in the AA are LMI levels.

Geographic Distribution of Loans to Businesses in Willacy County AA								
Census Tract Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Businesses	% of Number of Loans						
	42.74	35.00	57.26	65.00	0.00	0.00	0.00	0.00

Source: Loan sample; Dunn and Bradstreet data.

Responses to Complaints

The bank has received no complaints related to its performance under CRA.

COMMUNITY DEVELOPMENT TEST

Bank performance under the CD test is rated “Outstanding”. The bank demonstrated excellent responsiveness to the needs of their AAs. During the CRA evaluation, we interviewed a community contact in the AA that works for an organization that administers local, state, and federal grants to LMI areas for the population’s benefit. The contact noted that banks in the area could work more with not-for-profit organizations that cater to LMI families. The bank has originated over \$25 million in loans and made qualified investments in the form of donations for over \$80 thousand to businesses and organizations that benefit LMI families and individuals. CD loans and qualified investments during the CRA period total 86 percent of Tier 1 capital as of March 31, 2016. CD services performed by the bank exceed the standards for satisfactory CRA performance. Participation in Housing Authority Boards, Economic Development Corporations, a homeless shelter, and financial literacy education initiatives benefit LMI persons within the AAs.

Number and Amount of Community Development Loans

Qualified CD loans are those that meet the definition of CD as defined in the CRA regulation and do not include loans given consideration under the Lending Test.

Performance in the Cameron, Hidalgo, and Willacy County Assessment Areas

FCB originated an excellent level of CD loans in their AAs. FCB made over \$25 million in CD loans since the last CRA examination. Loans made during the evaluation period detailed below were to non-profit organizations, small business, and small farms within the AAs for community development in LMI and distressed areas.

- \$343,318 loan to Loaves & Fishes of the Rio Grande Valley Inc., a non-profit who provides meals and shelter to those in need.
- \$1,590,000 loan to Municipal Housing Finance Corporation, a small business low-income housing project.
- \$1,061,000 in total loans to Bruce Gamble farms, a small farm (less than \$1 million in annual revenues) providing economic development in the AA.

Number and Amount of Qualified Investments

Investments, deposits, membership's shares, or grants that have CD as their primary purpose are defined as "qualified investments" in the CRA regulation. These also include investments that support community services that target LMI families and individuals.

Performance in the Cameron, Hidalgo, and Willacy County Assessment Areas

FCB has contributed an adequate level to the community through numerous donations totaling over \$80,000 during the examination cycle. The bank makes ongoing contributions to organizations such as the Loaves & Fishes of the RGV, Boys and Girls Clubs, Boy Scouts and Girl Scouts, UTRGV, Junior League of Harlingen, Brownsville and Harlingen Literacy Centers, United Way, and the Family Crisis Center. These organizations work to service LMI families and individuals and distressed areas within the Rio Grande Valley (RGV).

Extent to Which the Bank Provides Community Development Services

Qualified CD services must meet the definition of "community development" in the CRA regulation and must be related to providing financial services to qualified individuals and organizations.

Performance in the Cameron, Hidalgo, and Willacy County Assessment Areas

FCB works in their community to provide financial guidance to individuals and organizations. The bank has several employees involved in organizations around the RGV. Bank employees hold roles as members and directors in organizations such as

Harlingen and San Benito Housing Finance Corporation, Willacy County Economic Development Corporation, Harlingen Housing Authority, United Way of Southern Cameron County, Business Development Fund of Texas, and Loaves & Fishes of the RGV Homeless Shelter. In addition, several employees provide financial literacy training in local schools and student organizations. Multiple local schools and age groups have benefited from bank employees presenting or helping develop school savings programs and financial literacy curricula.

Responsiveness to Community Development Needs

The bank demonstrates a strong responsiveness to the CD needs of its AAs. FCB invests a significant amount of time, loans, donations, and people into services for LMI individuals and distressed areas. The bank is responsive to the needs of non-profit organizations and small businesses in the community that directly impact LMI families and individuals. In addition, the bank has been active in sponsoring financial literacy curricula and school savings programs.

Fair Lending or Other Illegal Credit Practices Review

We conducted a Fair Lending review concurrent with the CRA examination. We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.