



## **PUBLIC DISCLOSURE**

October 9, 2018

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

First National Bank of Trinity  
Charter Number 13706

105 South Robb Street, Trinity, TX 75862

Office of the Comptroller of the Currency  
1800 West Loop 281, Suite 306, Longview, TX 75604-2516

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

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

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

First National Bank of Trinity (FNB Trinity or FNB) has a satisfactory record of meeting community credit needs based on the following:

- The loan-to-deposit (LTD) ratio is reasonable given the bank's size, financial condition, and assessment area (AA) credit needs.
- A majority of lending originated in the AA.
- The borrower distribution of loans by income level reflects reasonable distribution of borrowers of different income levels and businesses of different sizes.
- The geographic distribution of loans reflects excellent distribution among families and households of different income levels and businesses of different sizes.
- There have been no complaints related to FNB Trinity'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 metropolitan area/AA.

**Census Tract (CT):** A small subdivision of metropolitan and other densely populated counties. CT boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. CT(s) 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. CT(s) 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 Housing and Urban Development (HUD) Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's Assessment Areas (AA) or outside the AA(s) provided the bank has adequately addressed the community development needs of its AA(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:** A loan 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 CT 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 bank as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/AA.

**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 (OMB), and any other area designated as such by the appropriate federal financial supervisory agency.

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

**Metropolitan Statistical Area (MSA):** An area, defined by the OMB, as a core-based statistical area associated with at least one urbanized area that has a population of at least 50,000. The MSA 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 bank collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data a bank 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 a bank with domestic branches in only one state, the bank's CRA rating would be the state rating. If a bank maintains domestic branches in more than one state, the bank will receive a rating for each state in which those branches are located. If a bank maintains domestic branches in two or more states within a multi-state metropolitan area, the bank will receive a rating for the multi-state metropolitan area.

**Small Loan to Business:** 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 to Farm:** A loan included in 'loans to small farms' as defined in the instructions for preparation of the 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 Trinity is a single-state independent community bank in Texas with two full service locations. The main location is in Trinity and a branch is located in Riverside. FNB opened a loan production office in Jefferson in April 2014, which does not offer any deposit services. The bank has one AA comprised of one moderate- and seven middle-income CTs in Houston, San Jacinto, Trinity, and Walker counties. There are no low-income CTs in the AA. In 2016, all of the bank's AA was identified as distressed and in 2017, there were two CTs identified as distressed.

The bank is a full-service bank and offers a variety of products to business and consumer customers. Products include checking, savings, and individual retirement accounts, certificate of deposits, wire transfers, and safe deposit boxes. The bank also offers various business loans including term loans, lines of credit, agricultural, equipment, and commercial real estate. Personal loan products include residential mortgage, lines of credit, and consumer loans.

Banking hours and services are reasonable. Lobby hours are 8:30 a.m. to 4:00 p.m. Monday through Thursday and 8:30 a.m. to 5:00 p.m. on Friday. Motor bank hours are 7:30 a.m. to 5:00 p.m. Monday through Friday. There is also a non-deposit taking automated teller machine at each branch. The bank offers online banking, bill pay, and mobile banking to its personal and business customers. There were no branch openings or closings during the evaluation period.

As of December 31, 2017, FNB Trinity reported total assets of \$59 million, tier one capital of \$6 million, and net loans and leases totaling \$27 million. For the same time period by dollar volume, business, home mortgage, and consumer loans represented 34.14 percent, 28.76 percent, and 12.61 percent of gross loans, respectively. By number, consumer loans represented 44.04 percent, home mortgage loans represented 10.50 percent, and business loans represented 9.64 percent of gross loans. For this evaluation, we concluded business loans were the primary loan product and home mortgage and consumer loans were secondary products.

The last CRA evaluation dated January 21, 2014, resulted in an overall satisfactory rating. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA.



## **Scope of the Evaluation**

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

This evaluation includes a full-scope review of FNB Trinity's CRA activities within its AA, which includes the lending test. The lending test evaluates FNB's record of meeting the credit needs of the AA through its lending activities. The evaluation was completed using the CRA small bank examination procedures.

The evaluation period for the lending test is January 1, 2015, through December 31, 2017. We selected a sample of business, home mortgage, and consumer loans originating during the evaluation period. The loan sample consisted of 64 business loans, 82 home mortgage loans, and 90 consumer loans.

### **Data Integrity**

FNB Trinity is not required to collect and report loans under HMDA. Therefore, no prior data integrity testing was performed.

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

The bank's one AA, a non-MSA, received a full-scope review.

### **Ratings**

The overall rating is based solely on performance within the AA comprised of Houston, San Jacinto, Trinity, and Walker counties.

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

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

The OCC has not identified that FNB Trinity [or any affiliate whose loans have been considered as part of FNB Trinity's lending performance] engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

## Conclusions with Respect to Performance Tests

### LENDING TEST

FNB Trinity's performance under the lending test is satisfactory. The 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.

#### Loan-to-Deposit Ratio

The LTD ratio for FNB Trinity is below average when compared to similarly situated institutions, but it is reasonable given the bank's performance context. The LTD ratio averaged 43.65 percent for the 16 quarters since the last CRA evaluation, which is an increase from 33.49 percent at the prior CRA examination. Over the last 16 quarters, the bank's LTD ratio ranged from 31.97 percent to 49.46 percent. The LTD ratio of similarly situated institutions located in Houston, San Jacinto and Trinity counties with asset sizes ranging from \$42 million to \$92 million had an average LTD of 47.97 percent, having averages ranging from a low of 38.72 percent to a high of 54.10 percent. The total asset size, as of December 31, 2017, and the average quarterly LTD ratio of similarly situated institutions is illustrated in the table below.

Institution	Total Assets (\$000)	Average LTD Ratio (%)
FNB Trinity	59,434	43.65
The Bank of San Jacinto County	42,098	54.10
Lovelady State Bank	48,160	51.08
Citizens National Bank	92,558	38.72

Source: Call Report Data

FNB Trinity has traditionally made larger numbers of smaller-dollar, consumer-related loans. This trend was apparent during the evaluation period. As of December 31, 2017, the bank had a total of 1,276 loans on the trial balance totaling \$26 million, of which 562 consumer loans represented 44.04 percent of loans by number, and only 12.61 percent by dollar volume. The bank originates loans as small as \$500.

## Lending in Assessment Area

A majority of the bank's loans originated during the evaluation period were inside the bank's AA by both number and dollar amount.

**Table D - Lending Inside and Outside of the Assessment Area**

Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	49	59.76	33	40.24	82	3,466	48.57	3,670	51.43	7,136
Small Business	41	64.06	23	35.94	64	2,736	55.36	2,206	44.64	4,942
Consumer	62	68.89	28	31.11	90	269	70.60	112	29.40	381
<b>Total</b>	152	<b>64.41</b>	84	35.59	236	6,471	<b>51.94</b>	5,988	48.06	12,459

Source: Loan Sample for Evaluation Period: 01/01/2014-12/31/2017 Bank Data; Due to rounding, totals may not equal 100.00

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

The borrower distribution of loans by income level reflects reasonable distribution of borrowers of different income levels and businesses of different sizes.

Refer to Table P (Home Mortgage Loans), R (Business Loans), and V (Consumer Loans) in appendix C for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

### Home Mortgage Lending

In the years 2015 through 2016, the distribution of the bank's mortgage loans to low-income borrowers is substantial when compared to the demographics and excellent when compared to the aggregate. The distribution to moderate-income borrowers is good when compared to the demographics and excellent when compared to the aggregate.

In the year 2017, the distribution to low-income borrowers is substantial when compared to the demographics and excellent when compared to the aggregate. The distribution to moderate-income borrowers is adequate when compared to the demographics and excellent when compared to the aggregate.

### Business Lending

Borrower distribution of small business loans reflects excellent penetration. The bank's lending to businesses with gross annual revenues of \$1 million or less is excellent in the years 2015 through 2017.

## **Consumer Lending**

The distribution of loans to low- and moderate-income borrowers showed excellent distribution in years 2015 through 2016.

In the year 2017, the distribution of loans to low-income borrowers showed adequate distribution and distribution to moderate-income borrowers was excellent.

## **Geographic Distribution of Loans**

The geographic distribution of loans reflects excellent distribution among families and households of different income levels and businesses of different sizes. During the 2015 through 2016 evaluation period, there were no low- or moderate-income CTs. And in the year 2017, there were no low-income CTs and one moderate-income CT.

Refer to tables O (Home Mortgage Loans), Q (Business Loans), and U (Consumer Loans) in appendix C for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

## **Home Mortgage Lending**

In the year 2017, the geographic distribution in moderate-income CTs is excellent. The bank's performance exceeded the demographic and aggregate comparator.

## **Business Lending**

In the 2017, the geographic distribution in moderate-income CTs is excellent. The bank's performance exceeded the demographic and aggregate ratio.

## **Consumer Lending**

The geographic distribution in moderate-income CTs is excellent and the bank's performance exceeded the demographic comparator.

## **Responses to Complaints**

FNB Trinity has not received any CRA-related complaints during the evaluation period.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending Test (excludes CD loans): (01/01/15 to 12/31/17) Investment and Service Tests and CD Loans: NA	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First National Bank of Trinity Trinity, TX	Home Mortgage, Business and Consumer Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Houston, San Jacinto, Trinity and Walker counties	Full-Scope	Non-MSA Whole CTs within the counties

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

**Table A - Demographic Information of the Assessment Area**  
**Assessment Area: FNB Trinity AA**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	12.5	87.5	0.0	0.0
Population by Geography	30,626	0.0	8.5	91.5	0.0	0.0
Housing Units by Geography	14,722	0.0	9.0	91.0	0.0	0.0
Owner-Occupied Units by Geography	7,489	0.0	8.5	91.5	0.0	0.0
Occupied Rental Units by Geography	1,449	0.0	21.9	78.1	0.0	0.0
Vacant Units by Geography	5,784	0.0	6.5	93.5	0.0	0.0
Businesses by Geography	952	0.0	8.7	91.3	0.0	0.0
Farms by Geography	52	0.0	3.8	96.2	0.0	0.0
Family Distribution by Income Level	5,833	20.4	23.8	20.5	35.3	0.0
Household Distribution by Income Level	8,938	26.6	17.9	20.1	35.3	0.0
Median Family Income Non-MSAs - GA		\$52,076	Median Housing Value			\$91,625
			Median Gross Rent			\$623
			Families Below Poverty Level			11.0%

*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.*

FNB Trinity has one AA located in the non-MSA geography of Trinity, Houston, San Jacinto, and Walker counties. For the year 2017, there were no low-income CTs, one moderate-income CT (12.5 percent), seven middle-income CTs (87.5 percent) and no upper-income CTs. According to the Federal Deposit Insurance Corporation Market Share Report dated June 30, 2018, there were 16 financial institutions in the AA with the five largest competitors being First National Bank of Huntsville, Prosperity Bank, First Financial Bank, N.A., Pioneer Bank, SSB, and Citizens National Bank.

### Trinity County

The bank designated all five CTs in Trinity County as part of the AA. One CT is moderate-income and four are middle-income. According to the 2017 census data, the estimated population was 14,667. Groveton is the county seat, with an estimated population of 1,057 per 2017 census data.

The economic climate in Trinity county is good with specializations in agriculture, forestry, fishing, hunting, mining, quarrying, oil, gas extraction, and public administration. Major employers include Trinity ISD and the Texas Department of Criminal Justice. According to the 2016 U.S. Census Data, 20.1 percent of the population lived below the poverty level and the median household income was \$38,973. According to the Bureau of Labor Statistics (BLS), the September 2018 unemployment rate was 5.1 percent for the county. The unemployment rate

was consistent with the county's annual 2017 rate of 5.5 percent and lower than the 2016 unemployment rate of 6.1 percent.

Banking competition in Trinity county is minimal with FNB Trinity holding 35.12 percent of the deposit market share as of June 30, 2018. The remaining shares are held between two institutions, Citizens State Bank (40.90 percent) and Pioneer Bank, SSB (23.98 percent).

### **Houston, San Jacinto, and Walker Counties**

The bank designated one CT in each county of Houston, San Jacinto and Walker. All of the CTs are middle-income. Houston county, located northwest of Trinity county, is named for former Governor of Texas, Sam Houston, and was the first county established by the Republic of Texas. Per 2017 census data, the estimated population of Houston county was 23,021 and the estimated population of Crockett, the county seat, was 6,526. The economy includes businesses in livestock, timber, government services, manufacturing, and tourism. According to the 2016 U.S. Census Data, 22.1 percent of the population lived below the poverty level and the median household income was \$34,587. The September 2018 unemployment rate was 3.3 percent for the county, according to the BLS. The county's annual unemployment rate for 2017 was 4.2 percent, which was consistent with the 2016 unemployment rate of 4.6 percent.

San Jacinto county, located south of Trinity county, is named after the Battle of San Jacinto. Per 2017 census data, the estimated population of San Jacinto county was 28,270 and the estimated population of Coldspring, the county seat, was 923. The economy includes timber and oil businesses. According to the 2016 U.S. Census Data, 17.7 percent of the population lived below the poverty level and the median household income was \$45,794. The September 2018 unemployment rate was 4.8 percent for the county, according to the BLS. The county's annual unemployment rate for 2017 was 5.6 percent, which was lower than the 2016 unemployment rate of 6.3 percent.

Walker county, located west of Trinity county, is originally named after Robert J. Walker, a legislator from Mississippi, and was later renamed after Samuel H. Walker, a Texas Ranger and soldier in the U.S. Army. Per 2017 census data, the estimated population of Walker county was 72,245 and the estimated population of Huntsville, the county seat, was 41,277. The economy in the county is good with major employers being the Texas Department of Criminal Justice and Sam Houston State University. According to the 2016 U.S. Census Data, 22.3 percent of the population lived below the poverty level and the median household income was \$42,709. The September 2018 unemployment rate was 4.1 percent for the county, according to the BLS. The county's annual unemployment rate for 2017 was 4.6 percent, which was lower than the 2016 unemployment rate of 5.2 percent.

Banking competition in Houston, San Jacinto, and Walker counties is strong. FNB holds a 0.60 percent of the deposit market share as of June 30, 2018. Competition in this market includes First National Bank of Huntsville (23.55 percent) and Prosperity Bank (14.67 percent).



## **Community Contact**

We conducted a community contact to determine credit and development needs in the AA. A representative of a volunteer organization that coordinates efforts dedicated to economic development in the AA was interviewed. The primary function of the organization is to communicate the views of the business community as expressed by its members to promote the overall economic and social well-being of the community. The contact stated the general credit needs of the community are being met by financial institutions, but does see a need for new businesses in the area.

## Appendix C: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate MA(s) 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 as originations/purchases; (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA. Deposit data are compiled by the Federal Deposit Insurance Corporation and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this performance evaluation. Tables are identified by both letters and numbers, which results from how they are generated in supervisory analytical systems.

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

**Table O. AA 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. AA Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/AA. The table also presents aggregate peer data for the years the data is available.

**Table Q. AA Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. Because small business data 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 AA.

**Table R. AA Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. The table also presents aggregate peer data for the years the data is available.

- Table S. AA Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- Table T. AA Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. The table also presents aggregate peer data for the years the data is available.
- Table U. AA Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households throughout those geographies.
- Table V. AA 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 to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MA/AA.

**Table O : Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2015-2016**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
FNB Trinity AA	33	2,618	100.0	449	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>33</b>	<b>2,618</b>	<b>100.0</b>	<b>449</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank 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 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	
FNB Trinity AA	16	848	100.0	481	0.0	0.0	0.0	8.5	31.3	6.0	91.5	68.8	94.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>16</b>	<b>848</b>	<b>100.0</b>	<b>481</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>8.5</b>	<b>31.3</b>	<b>6.0</b>	<b>91.5</b>	<b>68.8</b>	<b>94.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</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, "--" 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
FNB Trinity AA	33	2,618	100.0	449	17.8	15.2	2.7	18.1	15.2	10.2	22.5	12.1	16.9	41.7	57.6	56.8	0.0	0.0	13.4
<b>Total</b>	<b>33</b>	<b>2,618</b>	<b>100.0</b>	<b>449</b>	<b>17.8</b>	<b>15.2</b>	<b>2.7</b>	<b>18.1</b>	<b>15.2</b>	<b>10.2</b>	<b>22.5</b>	<b>12.1</b>	<b>16.9</b>	<b>41.7</b>	<b>57.6</b>	<b>56.8</b>	<b>0.0</b>	<b>0.0</b>	<b>13.4</b>

*Source: 2010 U.S. Census ; 01/01/2015 - 12/31/2016 Bank 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
FNB Trinity AA	16	848	100.0	481	20.4	18.8	4.4	23.8	12.5	12.1	20.5	18.8	20.8	35.3	50.0	48.0	0.0	0.0	14.8
<b>Total</b>	<b>16</b>	<b>848</b>	<b>100.0</b>	<b>481</b>	<b>20.4</b>	<b>18.8</b>	<b>4.4</b>	<b>23.8</b>	<b>12.5</b>	<b>12.1</b>	<b>20.5</b>	<b>18.8</b>	<b>20.8</b>	<b>35.3</b>	<b>50.0</b>	<b>48.0</b>	<b>0.0</b>	<b>0.0</b>	<b>14.8</b>

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2017 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**

**2015-2016**

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
FNB Trinity AA	25	2,064	100.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
<b>Total</b>	<b>25</b>	<b>2,064</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 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**

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
FNB Trinity AA	16	672	100	0.0	0.0	8.7	31.3	91.3	68.8	0.0	0.0	0.0	0.0
<b>Total</b>	<b>16</b>	<b>672</b>	<b>100</b>	<b>0.0</b>	<b>0.0</b>	<b>8.7</b>	<b>31.3</b>	<b>91.3</b>	<b>68.8</b>	<b>0.0</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; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2015-2016**

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
FNB Trinity AA	25	2,064	100.0	252	82.0	96.0	51.5	3.3	0.0	14.7	4.0
<b>Total</b>	<b>25</b>	<b>2,064</b>	<b>100.0</b>	<b>252</b>	<b>82.0</b>	<b>96.0</b>	<b>51.5</b>	<b>3.3</b>	<b>0.0</b>	<b>14.7</b>	<b>4.0</b>

Source: 2016 D&B Data; 01/01/2015 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

**Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues** **2017**

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
FNB Trinity AA	16	672	100.0	252	85.3	87.5	45.2	3.9	0.0	10.8	12.5
<b>Total</b>	<b>16</b>	<b>672</b>	<b>100.0</b>	<b>252</b>	<b>85.3</b>	<b>87.5</b>	<b>45.2</b>	<b>3.9</b>	<b>0.0</b>	<b>10.8</b>	<b>12.5</b>

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

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2015-2016**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
FNB Trinity AA	43	205	100	0.0	0.0	0.0	2.3	100.0	97.7	0.0	0.0	0.0	0.0

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography** **2017**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
FNB Trinity AA	19	64	100	0.0	0.0	10.7	15.8	89.3	84.2	0.0	0.0	0.0	0.0

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



**Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** **2015-2016**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
FNB Trinity AA	43	205	100.0	20.2	37.2	15.8	25.6	20.8	18.6	43.3	16.3	0.0	2.3
<b>Total</b>	<b>43</b>	<b>205</b>	<b>100.0</b>	<b>20.2</b>	<b>37.2</b>	<b>15.8</b>	<b>25.6</b>	<b>20.8</b>	<b>18.6</b>	<b>43.3</b>	<b>16.3</b>	<b>0.0</b>	<b>2.3</b>

Source: 2010 U.S. Census; 01/01/2015 - 12/31/2016 Bank Data. Due to rounding, totals may not equal 100.0

**Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** **2017**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
FNB Trinity AA	19	63	100.0	26.6	15.8	17.9	26.3	20.2	26.3	35.3	31.6	0.0	0.0
<b>Total</b>	<b>19</b>	<b>63</b>	<b>100.0</b>	<b>26.6</b>	<b>15.8</b>	<b>17.9</b>	<b>26.3</b>	<b>20.2</b>	<b>26.3</b>	<b>35.3</b>	<b>31.6</b>	<b>0.0</b>	<b>0.0</b>

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