



PUBLIC DISCLOSURE

June 11, 2018

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The First National Bank of Winnsboro
Charter Number 5674

315 North Main
Winnsboro, TX 75604

Office of the Comptroller of the Currency

1800 NW 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.

Table of Contents

OVERALL CRA RATING	3
DEFINITIONS AND COMMON ABBREVIATIONS	4
DESCRIPTION OF INSTITUTION	8
SCOPE OF THE EVALUATION.....	8
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	10
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS.....	11
LENDING TEST.....	11
APPENDIX A: SCOPE OF EXAMINATION.....	1
APPENDIX B: COMMUNITY PROFILES FOR FULL-SCOPE AREAS.....	1

INSTITUTION'S CRA RATING: This institution is rated Satisfactory

First National Bank of Winnsboro (FNB or bank) has a “Satisfactory” record of meeting the credit needs within its assessment area (AA). The major factors supporting this rating include:

- The bank’s average loan-to-deposit (LTD) ratio is reasonable.
- A majority of the bank’s loans were extended within its AA.
- The bank’s distribution of loans based on borrower income and business size is reasonable.
- The bank’s geographic distribution of loans reflects a reasonable dispersion within its AA.

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 (MA)/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 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 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 AA(s) 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 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 (MSA) 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 MA/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, and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division (MD): 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. An MD consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The 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 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings, and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Bank

FNB is a nationally chartered community bank headquartered at 315 Main Street in Winnsboro, Texas. In addition to the main office, FNB has two branches, one located in Winnsboro, Texas with the other located in Winona, Texas. The bank reported total assets of \$141.3 million, as of March 31, 2018 and ownership is centered in Etex Banco, Inc., a one bank holding company. FNB's business strategy is that of a traditional community bank with focus on small business lending and consumer loans. FNB has designated two distinct AAs. The Winnsboro AA consists of the non-MSA counties of Franklin, Hopkins, and Wood, while the Winona AA is part of the Tyler, Texas MSA and consists of CTs 15.00, 17.00 and 18.01.

As of March 31, 2018, FNB's loan portfolio totaled \$91.1 million with reported deposits of \$109.7 million. The bank's lending focus for the Winnsboro AA is small business loans and consumer loans, while the lending focus for the Winona AA is consumer lending.

There are no financial or legal obstacles affecting the bank's ability to meet community credit needs. The bank was rated "Satisfactory" during the prior CRA Examination dated October 14, 2013. OCC records and the bank's CRA Public File indicate there have been no complaints related to the bank's CRA performance. FNB's tier 1 capital equaled \$26.5 million, representing 18.84 percent of adjusted average assets as of March 31, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

FNB's CRA performance was evaluated using the small bank CRA procedures. Under these procedures, loan originations are evaluated to determine if the bank is meeting the credit needs of its AAs. Conclusions regarding FNB's lending volume were based on consumer lending, small business loans, and one- to four-family mortgages. Conclusions for income distribution and geographic dispersions were based on statistical samples of small business loans and consumer loans for the Winnsboro AA and statistical samples of consumer loans for the Winona AA. Small business and consumer loans were analyzed separately for 2016 and 2017 due to different demographic data being in place for the two time periods.

Data Integrity

Prior to this CRA examination, a data integrity examination was performed to verify the accuracy of the HMDA data. No significant errors were identified.

Selection of Areas for Full-Scope Review

We performed a full-scope review for the Winnsboro AA. FNB has two locations in this AA and 89.6 percent of FNB's deposits. In addition, a majority of the bank's lending volume is in this AA with 87.94 percent of loans originating out of these offices. FNB ranked 7th out of 14 in deposit market share with 5.49 percent of the outstanding deposits as of June 30, 2017.

A limited-scope review was completed for the Winona AA. FNB has one branch located in this AA. Bank deposits represented 10.35 percent, while lending volume represented 12.06 percent. FNB ranked 21st out of 24 in deposit market share with 0.19 percent of the outstanding deposits as of June 30, 2017. Significantly impacting the lower activity is the strong competition within the Tyler, Texas MSA.

Ratings

The bank's overall rating is based primarily on the performance in the Winnsboro AA, as the vast majority of the bank's deposits and lending volume originated in this AA.

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 AA 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 this bank has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this bank engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the bank'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's performance under the CRA is "Satisfactory". The bank's LTD ratio is reasonable, and a majority of the bank's lending activity was originated within its AA. In addition, the distribution of loans to borrowers of different income levels reflects a reasonable penetration, and the geographic distribution of loans reflects a reasonable dispersion. Finally, there were no CRA-related complaints filed during this evaluation period.

Loan-to-Deposit Ratio

FNB's LTD ratio is reasonable given the bank's size, financial condition, and AA credit needs. The bank's quarterly LTD ratio has averaged 77.73 percent since the prior CRA evaluation. The average quarterly LTD ratio of similarly situated banks for the same time period equaled 75.70 percent and ranged from 43.99 percent to 125.03 percent.

Lending in Assessment Area

A majority of the bank's lending activity is located inside its AA. We reviewed all one- to four-family mortgages along with samples of business loans and consumer loans originated during 2016 and 2017. This sample reflected 71.06 percent of the number of loans were extended in the bank's AA. Refer to the following table:

Table 1 - Lending in Assessment Area										
Loan Type	Number of Loans					Dollars of Loans				
	Inside		Outside		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
1-4 Family Mortgages	77	66.96%	38	33.04%	115	6,292	61.75%	3,897	38.25%	10,189
Consumer	61	76.25%	19	23.75%	80	347	59.42%	237	40.58%	584
Small Business	29	72.50%	11	27.50%	40	4,886	39.03%	7,632	60.97%	12,518
Totals	167	71.06%	68	28.94%	235	11,525	49.48%	11,766	50.52%	23,291

Source: Loan sample; HMDA data.

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

FNB's distribution of loans to borrowers of different income and businesses of different sizes income represents a reasonable penetration.

Conclusions for full-scope AA:

The distribution of loan originations represents a reasonable penetration among businesses of different sizes. The percentage of loans by number to businesses with revenues less than \$1 million exceeded the AA's demographics for 2016 and was near to the AA's demographics for 2017.

Table 2A - Borrower Distribution of Loans to Businesses in Winnsboro 2016				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	84.60	4.41	10.99	100%
% of Bank Loans in AA by #	85.00	15.00	0.00	100%
% of Bank Loans in AA by \$	95.33	4.67	0.00	100%

Source: Loan sample; Dun and Bradstreet data.

Table 2A - Borrower Distribution of Loans to Businesses in Winnsboro AA 2017				
Business Revenues (or Sales)	≤\$1,000,000	>\$1,000,000	Unavailable/Unknown	Total
% of AA Businesses	84.01	4.71	11.28	100%
% of Bank Loans in AA by #	75.00	25.00	0.00	100%
% of Bank Loans in AA by \$	42.08	57.92	0.00	100%

Source: Loan sample; Dun and Bradstreet data.

The distribution of consumer loan originations represents a reasonable penetration to borrowers of different income levels. While the percentage of loan originations to moderate-income borrowers was significantly less than the percentage of moderate-income households, the percentage of loan originations to low-income borrowers significantly exceeded the percentage of low-income households.

Table 2B - Borrower Distribution of Consumer Loans in Winnsboro AA 2016								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Consumer Loans	20.89	35.00	15.32	5.00	18.81	25.00	44.98	35.00

Source: Loan sample; U.S. Census data.

Table 2B - Borrower Distribution of Consumer Loans in Winnsboro AA 2017								
Borrower Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Consumer Loans	22.09	45.00	16.45	5.00	17.08	10.00	44.37	40.00

Source: Loan sample; U.S. Census data.

Conclusions for limited-scope AA:

Based on a limited-scope review, FNB’s performance in the Winona AA is weaker than the bank’s performance in the Winnsboro AA. The distribution of consumer loans to low- and moderate-income borrowers were less than the percentage of low- and moderate-income households located in this AA. Greater emphasis was placed on the bank’s lending activities in the Winnsboro AA as the vast majority of the bank’s deposits and lending activities are located there.

Table 2B - Borrower Distribution of Consumer Loans in Winona AA 2016								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Consumer Loans	24.01	16.67	15.60	16.67	20.18	16.67	40.21	50.00

Source: Loan sample; U.S. Census data.

Table 2B - Borrower Distribution of Consumer Loans in Winona AA 2017								
Borrower Income Level	Low		Moderate		Middle		Upper	
Loan Type	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Consumer Loans	29.09	28.33	23.70	16.67	17.37	15.00	29.84	40.00

Source: Loan sample; U.S. Census data.

Geographic Distribution of Loans

FNB’s distribution of loans by geography reflects a reasonable dispersion given the demographics of the bank’s AAs. The analysis for the full-scope review was based on 2017 loan originations only, as there were no CTs identified as low- or moderate-income based on 2016 demographic data.

Conclusions for full-scope AA:

FNB's distribution of business loans by geography reflects a reasonable dispersion in the Winnsboro AA. The percentage of small business loans originated during 2017 in moderate-income CTs exceeded the percentage of businesses located there. Five percent of small business loans were originated within a moderate-income CT, compared to two percent of businesses that are located in a moderate-income CT.

Table 3A - Geographic Distribution of Loans to Businesses in Winnsboro AA 2017

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
	0.00	0.00	2.00	5.00	83.88	85.00	14.11	10.00

Source: Loan sample; Dun and Bradstreet data.

The distribution of consumer loan originations represents an excellent dispersion throughout the Winnsboro AA. The percentage of 2017 consumer loan originations significantly exceeded the percentage of households located within moderate-income CTs. Twenty-five percent of consumer loans were originated within a moderate-income CT compared to 2.87 percent of the households that reside in moderate-income CTs.

Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Consumer Loans	0.00	0.00	2.87	25.00	80.28	75.00	16.84	0.00

Source: Loan sample; U.S. Census data.

Conclusions for limited-scope AA:

Based on a limited-scope review, FNB’s performance in the Winona AA was weaker than the bank’s performance in the Winnsboro AA. The distribution of consumer loans in moderate income CTs were less than the percentage of households residing there for both 2016 and 2017. Greater emphasis was placed on the bank’s lending activities in the Winnsboro AA as the vast majority of the bank’s deposits and lending activities are located there.

Table 3B - Geographic Distribution of Consumer Loans in Winona AA – 2016								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Consumer Loans	0.00	0.00	37.70	27.78	62.30	72.22	0.00	0.00

Source: Loan sample; U.S. Census data.

Table 3B - Geographic Distribution of Consumer Loans in Winona AA – 2017								
Census Tract Income Level	Low		Moderate		Middle		Upper	
	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans	% of AA Households	% of Number of Loans
Consumer Loans	0.00	0.00	70.40	28.33	29.60	71.67	0.00	0.00

Source: Loan sample; U.S. Census data.

Responses to Complaints

FNB did not receive any complaints or public comments regarding CRA performance during this evaluation period.

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: (01/01/2016 to 12/31/2017)	
Financial Institution	Products Reviewed	
First National Bank (FNB) Winnsboro, TX	1-4 Family Mortgages (In and Out only) Business Loans Consumer Loans	
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Winnsboro AA Winona AA	Full-scope Limited-scope	Business and Consumer Loans Consumer Loans

Appendix B: Community Profiles for Full-Scope Areas

Assessment Area – 2016 Demographics

Demographic Information for Full-Scope Area: 2016 Demographics						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CT/Block Numbering Areas (BNAs))	22	0.00	0.00	86.36	13.64	0.00
Population by Geography	87,730	0.00	0.00	86.78	13.22	0.00
Owner-Occupied Housing by Geography	25,345	0.00	0.00	85.75	14.25	0.00
Businesses by Geography	5,415	0.00	0.00	89.12	10.88	0.00
Farms by Geography	447	0.00	0.00	80.09	19.91	0.00
Family Distribution by Income Level	23,780	18.07	17.86	19.80	44.27	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	8,544	0.00	0.00	89.44	10.56	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2016 Households Below the Poverty Level	= \$52,400 = 14.52%	Median Housing Value Unemployment Rate				= \$97,261 = 4.31%

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2016 FFIEC updated MFI.

Assessment Area – 2017 Demographics

Demographic Information for Full-Scope Area: 2017 Demographics						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	22	0.00	4.55	81.82	13.64	0.00
Population by Geography	88,956	0.00	2.82	80.79	16.39	0.00
Owner-Occupied Housing by Geography	25,375	0.00	2.55	78.45	19.01	0.00
Businesses by Geography	5,442	0.00	2.00	83.88	14.11	0.00
Farms by Geography	430	0.00	2.09	69.77	28.14	0.00
Family Distribution by Income Level	24,818	20.49	17.78	19.63	42.10	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	9,346	0.00	3.91	81.12	14.97	0.00
Median Family Income FFIEC Adjusted Median Family Income for 2017 Households Below the Poverty Level	= \$54,200 = 15.26%	Median Housing Value Unemployment Rate		= \$104,330 = 4.23%		

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2010 U.S. Census, and 2017 FFIEC updated MFI.

FNB has designated all of Franklin, Hopkins, and Wood Counties as the bank’s primary AA. Refer to the bank’s CRA Public File for details. This AA meets the requirements of the Community Reinvestment Act and does not arbitrarily exclude any low- or moderate-income geographies. The AA has a total population of 89,000. Based on 2016 demographic data, this area consisted of nineteen middle-income CTs and three upper-income CT. Changes in the AA’s demographics during 2017 resulted in the following composition: one moderate-income CT, 18 middle-income CTs and three upper-income CTs.

Major industries include retail, health care, and manufacturing. The local economy is considered stable with unemployment as of March 2018 reported at 4.5 percent for Franklin and Wood Counties and 3.7 percent for Hopkins County, compared to a statewide unemployment rate of 4.1 percent for Texas. The AA’s poverty is moderately high with 15.26 percent of households living below the poverty level. Competition is strong with several local community banks located within the AA.

We contacted a local representative from a community based development organization as part of our community needs assessment. The representative did not identify any credit needs that were not being met.