



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Southwestern District Office

Public Disclosure

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Community Reinvestment Act Performance Evaluation

**San Angelo National Bank
Charter Number: 23445**

**301 West Beauregard Street
San Angelo, TX 76903**

Office of the Comptroller of the Currency

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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

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

The following table indicates the performance level of **San Angelo National Bank** with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Business lending which favors lending to small businesses and to businesses in LMI geographies.
- Good performance in consumer lending to LMI individuals.
- HMDA lending patterns which show the bank's support for residential purchase and home improvement lending to LMI geographies and persons.
- An adequate level of community development investments.
- A good branch and alternate delivery system of providing retail banking services and products, particularly to LMI geographies and individuals.
- A favorable level of community development services, one of which had a particularly high impact for an organization that serves primarily low-income people.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation. 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.

Block Numbering Area (BNA) - Statistical subdivisions of counties in which census tracts have not been established. The U.S. Census Bureau has established BNAs in conjunction with state agencies.

Census Tract (CT) - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the U.S. Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten-year census and an average population of 4,000.

Community Development (CD) - Affordable 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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.

Full-Scope Review - Performance under the lending, investment, and service tests is analyzed considering fully understood performance context, quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution) and qualitative factors (e.g., innovation, complexity).

Geography - A census tract or a block numbering area delineated by the U.S. Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA) - The statute that requires certain mortgage lenders that do 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, and the disposition of the application (e.g., approved, denied, withdrawn).

Home Mortgage Loans - Such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwellings loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

Limited-Scope Review - Performance under the lending, investment, and service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, branch distribution).

Low-Income - Income levels that are less than 50 percent of the median family income.

Median Family Income (MFI) - The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 Statistical Area (MSA) - Area defined by the director of the U.S. Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

Middle-Income - Income levels that are at least 80 percent and less than 120 percent of the MFI.

Moderate-Income - Income levels that are at least 50 percent and less than 80 percent of the MFI.

Small Loans to Businesses - Loans with original amounts of \$1 million or less that are: (1) secured by non-farm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

Small Loans to Farms - Loans with original amounts of \$500,000 or less that are: (1) secured by farmland; or (2) 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 - Income levels that are 120 percent or more of the MFI.

Description of Institution

San Angelo National Bank (SANB) is an intrastate bank that is based in San Angelo, Texas. As of December 31, 2000, SANB's total assets were \$290 million with both of its banking offices located in the city of San Angelo, Texas. SANB is a subsidiary of First Financial Bankshares, Inc. (FFBI), a multi-bank holding company headquartered in Abilene, Texas. Consolidated holding company assets total \$1.7 billion as of December 31, 2000. The parent organization owns nine banks with 25 full-service locations in the Central, West and High Plains regions of Texas. A full range of credit products, depository accounts, trust services and retail nondeposit investment services are offered throughout the company.

SANB's charter was effective on September 25, 1997 when Southwest Bank of San Angelo (SWB-SA), a bank owned by FFBI, merged with Texas Commerce Bank-San Angelo (TCB-SA). On that date, SWB-SA and TCB-SA ceased to exist. Following the merger, the former TCB-SA main office became SANB's main office and the former SWB-SA location became SANB's branch. The former TCB-SA branch was closed as it was located less than 1000 feet from the new branch and effectively served the same market.

The loan portfolio is \$113 million, or 39% of total assets. Investment securities, excluding federal funds sold, comprise 40%. Management's lending strategy has resulted in a fairly balanced approach among real estate, commercial and agricultural, and consumer loans. Loans secured by real estate total \$44 million or 39% of total loans. Commercial and agricultural loans total \$31 million or 27% of total loans. Consumer loans total \$38 million or 34% of total loans.

As of December 31, 2000, the bank's loan-to-deposit ratio measured 50%, reflecting a gradual, slight increase from December 31, 1997 when the ratio was 44%. The bank's return-on-assets is 1.1%, and the Tier One leverage capital ratio is 10.0%. Based on the bank's financial condition, size, product offerings, and branch configuration, there are no legal impediments which inhibit its ability to meet the assessment area's credit needs. The community's resistance to the construction of multi-family affordable housing units has inhibited the bank's ability to meet this identified growing need.

This CRA examination is the first for SANB under the current charter. Prior to the merger, SWB-SA was rated "Satisfactory" as of October 1, 1996. TCB-SA was rated "Satisfactory" as of August 8, 1996. A review of OCC records, as well as the bank's CRA Public File, did not reveal any complaints relating to the bank's CRA performance since the merger.

During the evaluation period, SANB's strategic plan has been to provide a wide array of financial services to consumers and small businesses within the market area. The bank offers a variety of loan products, including the following types of loans: residential mortgages, home equity, home improvement, construction, commercial, commercial mortgages, personal and education. In March, 2001 SANB made a business decision to stop purchasing consumer loans referred by indirect lenders and to concentrate on small business lending. The bank has elected to include consumer loans secured by motor vehicles that originated in 1998, 1999, and 2000 with HMDA-reportable mortgage loans, and small loans to businesses and farms in this CRA evaluation.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test includes consumer loans secured by motor vehicles, HMDA and CRA loans made in 1998, 1999, and 2000, and any community development loans made between September 25, 1997 and July 9, 2001. The evaluation period for the investment and service tests includes any qualifying CD investments made and any CD services provided from September 25, 1997 to July 9, 2001.

Data Integrity

The OCC verified HMDA and CRA loan data that was used in the evaluation of the bank's performance during a Data Integrity Review in June, 2001. Samples of residential real estate, small business/small farm, and consumer loans were selected in accordance with sampling methods as described in the Large Bank CRA Examiner Guidance, dated December 2000. The OCC did not identify any systemic errors in publicly reported loan data. Therefore, the publicly reported data was relied upon in evaluating the bank's performance.

Selection of Areas for Full-Scope Review

A full-scope review was performed on the bank's one assessment area - San Angelo, Texas MSA. Refer to the table in Appendix A for more information.

Ratings

The bank's overall rating is based on the full-scope review of the bank's one assessment area - San Angelo, Texas MSA.

Other

Two community leaders in the city of San Angelo, Texas were contacted during the evaluation of the bank's performance. One deals with affordable housing issues and the other with small business development. Both indicated few, if any, opportunities to invest in community development projects in the AA. They referenced examples of the community's resistance to actively address identified community development needs for economic development in a designated enterprise zone and for more multifamily affordable housing. Specifically identified credit needs included more flexible lending criteria for small business lending and for purchasing affordable housing. An indicator of the strong affordable housing need is a waiting list for assisted public housing that has approximately 500 families/individuals. See the Investment Test for details on the lack of investment opportunities in the AA.

Fair Lending Review

An analysis of 1997-2001 public comments and consumer complaint information was performed according to the OCC's risk-based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The bank has not received a comprehensive fair lending exam since being chartered in September 1997.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the San Angelo MSA is good. Small business and consumer lending weighed most heavily in evaluating the bank's performance under the Lending Test. Small business and consumer loans represent the largest loan types at 38% and 34%, respectively. Although consumer loans do not constitute a substantial majority of total loans, the bank elected to provide information on motor vehicle loans for consideration in this analysis. Motor vehicle loans represent the highest volume category of consumer loans. SANB originated a low volume of home mortgage and small farm loans during the evaluation period. Home mortgage loans represented 14% of total loans and small farm loans represented 7%. The bank did not originate or purchase any community development loans during the evaluation period.

Lending Activity

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

The volume of lending is excellent. SANB and one competitor are tied for the leading deposit market share at 24% each. SANB's market share for small business lending exceeds the deposit market share at 27%. SANB also ranks first in small business lending. With almost 2,000 originations, motor vehicle loans represent the highest volume of consumer loans during the evaluation period. This volume of consumer lending positively impacts the overall rating for the Lending Test. Because consumer loan reporting is optional, market share information is not available.

Although small farm lending is not a primary loan product, SANB ranks first with a market share of 60%. SANB's market shares for home purchase and home mortgage refinance loans reflect the bank's less active role in this line of business. The market share for home purchase loans is less than 5% and the market share for home mortgage refinance loans is even lower at less than 1%. These market shares significantly lag the bank's deposit market share. However, market rankings indicate strong competition from non-bank mortgage lenders. SANB has a bigger impact in home improvement lending than other mortgage loan products, with a market share of 18% and a market rank of second.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3 and 4 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans is good. The largest volume loan product is home purchase loans. The percentage of loans originated and purchased in both low- and moderate-income geographies is less than the percentage of owner-occupied housing in those geographies. However, the bank's market share in moderate-income geographies exceeds its overall market share.

The volume of home improvement loans originated during the evaluation period is almost 40% less than the volume of home purchase loans, but performance is stronger. Lending in low- and moderate-income geographies exceeds the percentage of owner-occupied housing in those geographies. Additionally, the bank's market share in low- and moderate-income geographies substantially exceeds its overall market share.

The bank originated few home mortgage refinance loans during the evaluation period. While there were no originations in low-income geographies, originations in moderate-income geographies were near to the percentage of owner-occupied housing in that geography. Likewise, the bank's market share for this loan product in moderate-income geographies exceeded its overall market share.

Small Loans to Businesses

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good. The percentage of the bank's loans in both low- and moderate-income geographies is near the percentage of businesses located in those geographies. The bank's market shares in low- and moderate-income geographies slightly exceed its overall market share.

Small Loans to Farms

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The geographic distribution of small loans to farms is good. The percentage of the bank's loans in low-income geographies is less than the percentage of farms in those geographies. The percentage of small loans to farms in moderate-income geographies is near to the percentage of farms in those geographies. Market share data for low- and moderate-income geographies bears a similar relationship to the bank's overall market share.

Consumer Loans

Refer to Table 14 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The geographic distribution of consumer loans is good. The percentage of the bank's loans in low-income geographies slightly exceeds the percentage of households in those geographies. The percentage of loans in moderate-income geographies is near to the percentage of households in those geographies.

Lending Gap Analysis

No unexplained or conspicuous gaps in lending were identified. Small loans to businesses and consumer loans, which weighed most heavily in the Lending Test, were made in all geographies in the AA. There were no small loans to farms in several low- and moderate-income geographies. However, these geographies are in the City of San Angelo where there is no farming activity.

The bank did not originate any home purchase loans in two low-income geographies. One of the low-income geographies is the central business district. The other low-income geography is adjacent to downtown where there is relatively little residential housing and many businesses. Due to the low number of home mortgage refinance loans originated in the evaluation period, a number of geographies are not represented. However, this includes geographies of all income levels.

Inside/Outside Ratio

The inside/outside ratio analysis was performed at the bank level as opposed to the AA level. This information includes bank originations and purchases only and does not include any extensions of credit by affiliates. The bank's lending activity within the AA is excellent. The results of this analysis had a positive impact on the overall Lending Test rating. With the exception of small loans to farms, a substantial majority of loans in all reported categories were made in the AA. Over 90% of originations and purchases by the bank for each of the home mortgage products and for small loans to businesses were made in the AA. Eighty-one percent of consumer loans were originated or purchased within the bank's AA. A slight majority of small loans to farms was originated in the AA. Many of the small loans to farms were originated in neighboring rural counties.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 7, 8, and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is good. Performance is strongest for moderate-income borrowers. The percentage of the bank's loans to moderate-income borrowers for home purchase and home improvement loans exceeds the percentage of families that are moderate-income. However, the percentage of the bank's home purchase loans to low-income borrowers is less than the percentage of families that are low-income. The percentage of home improvement loans to low-income borrowers nearly meets the percentage of families that are low-income. The market shares for both loan products for low- and moderate-income borrowers exceed the bank's overall market shares. Less weight is placed on the bank's record of originating home mortgage refinance loans since the volume of originations is small. The percentages of the bank's loans to low- and moderate-income borrowers for home mortgage refinance loans are less than the percentages of families that are low- and moderate-income.

Small Loans to Businesses

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is good. The percentage of loans to business with revenues of \$1 million or less is less than the percentage of businesses with revenues of \$1 million or less. However, the bank's market share of loans to small businesses exceeds its market share of loans to businesses of all sizes. A substantial majority of loans by original amount regardless of business size are for \$100,000 or less.

Small Loans to Farms

Refer to Table 11 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

The borrower distribution of small loans to farms is good. The percentage of loans to farms with revenues of \$1 million or less is less than the percentage of farms with revenues of \$1 million or less. However, the bank's market share of loans to small farms exceeds its market share of loans to farms of all sizes. A substantial majority of loans by original amount regardless of farm size are for \$100,000 or less.

Consumer Loans

Refer to Table 14 in appendix C for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The borrower distribution of consumer loans is good. The percentage of the bank's loans to low-income borrowers is less than the percentage of households that are low-income. However, the percentage of the bank's loans to moderate-income borrowers exceeds the percentage of households that are moderate-income.

Community Development Lending

SANB did not report any community development loans for the evaluation period.

Product Innovation and Flexibility

The bank did not report any innovative and flexible loan products.

Conclusions for Areas Receiving Limited-Scope Reviews

Not applicable.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the San Angelo, Texas MSA is adequate.

Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period SANB made \$84 thousand in qualified investments, all of which directly benefited the full-scope area. This volume of investments is adequate, given the low level of community development investment opportunities in the San Angelo MSA. Community contacts indicated they were unaware of any real opportunities to invest in community development projects in the AA. The City of San Angelo adopted a tax abatement policy November 4, 1997. This policy's stated intent is to encourage economic development and rehabilitation in a designated enterprise zone, which includes most of the low- and moderate-income CT's in the AA. Applications are to be considered on a case-by-case basis by the San Angelo City Council. However, none have been approved since adoption of the policy. In addition, the city government and residential communities have historically opposed construction of any new affordable housing units. Examples include the city's expired opportunity to use approximately \$12 million in HUD funding for construction of new affordable housing projects and opposition by local residents to a new affordable housing multifamily project. One of the contacts indicated that the only new multifamily projects that have come on line were purchased by the city's housing authority at foreclosure. This lack of support for economic development in low- and moderate-income areas and affordable housing initiatives in the San Angelo area has effectively limited investment opportunities by local financial institutions. Therefore, existing investment opportunities primarily involve providing grants for community development purposes.

Specific examples of qualified investments consist of grants to the organizations below. Grants to these organizations are routinely provided by others in the AA. None are considered complex or innovative.

- United Way of the Concho Valley (UW). SANB determined that the most effective way to reach the community and social service groups in the AA is through donations to this San Angelo-based United Way. Since inception of its charter in September 1997, the bank has donated \$80,000 to UW. Some of the more notable United Way agencies include Adult Day Care Center of San Angelo, Alcohol and Drug Abuse Center, Boys and Girls Clubs, Christians in Action, Christmas in April, Healthy Families of San Angelo, Institute for Cognitive Development, Regional Food Bank, Salvation Army, and San Angelo Day Nursery.
- Habitat for Humanity of San Angelo. The bank donated \$1,430 for operating expenses and purchasing office equipment to this organization whose focus is affordable housing.
- San Angelo Lions Charities, Inc. The bank donated \$1,250 to this organization whose major activity is to provide glaucoma medication for those who do not qualify under any

other program. This charity targets persons whose income is at or below 150% of the federal poverty level, or 45% of the area's median family income.

- Concho Resource Center. The bank gave \$1,000 to this organization that provides assisted housing, job and life skills training, and other community services to mentally, visually, and physically challenged persons whose income is at or below the federal poverty level.

Refer to the "Metropolitan Areas" section of this Evaluation for additional performance context information.

Conclusions for Area Receiving Limited-Scope Reviews

Not applicable.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "High Satisfactory". This is based on a full-scope review of the bank's good performance in the San Angelo, Texas MSA.

Retail Banking Services

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's services delivery systems are easily accessible to geographies and individuals of different income levels in the San Angelo, Texas MSA, and particularly to those in LMI CTs. The percentage of the bank's offices located in low-income CTs significantly exceeds the portion of the population located in those tracts. The main office is in a low-income CT that borders the other low-income CT and three of the five moderate-income CTs. SANB has no locations in moderate-income geographies. The absence of SANB offices in moderate-income tracts is mitigated by the branch's relatively easy access by residents in two nearby moderate-income CTs. The remaining moderate-income CT represents the residential quarters of military personnel living on Goodfellow Air Force Base, who have reasonable access to the branch.

SANB's record of opening and closing offices has not had an adverse impact on the availability of its products and services, and particularly to LMI CTs and persons. Following the merger, the bank had two branches in middle-income tracts within 1000 feet of each other and on the same street. The bank subsequently closed the smaller location in favor of the larger one, which was more suited to providing better service to the community.

The bank's alternative delivery system is reasonably effective in providing retail banking services to LMI areas and persons. The ATM system includes two locations in one low-income CT, three in middle-income CTs, which are reasonably accessible to LMI CTs, and one in an upper-income CT. SANB also offers toll-free telephone banking, consumer loan applications by internet or mail, and personal and commercial banking by computer.

Standard bank services are offered by SANB at both banking centers. Hours, services and products offered are consistent throughout the AA, except for a minor difference in Saturday hours. The lobby of the main office is not open on Saturdays, although motor bank services are available at that location. This variance is deemed to not have a significant adverse effect on the availability of services to LMI geographies and individuals because the branch, whose lobby is open on Saturdays, is on a major thoroughfare and easily accessible by persons in all LMI tracts. All locations, including the telephone banking areas, offer services in Spanish.

SANB offers a free checking account, which is receptive to the LMI customers in that no minimum balance is required and no monthly maintenance fees are assessed. SANB also offers commercial checking and savings accounts, which are tailored to small businesses. The checking account has a \$10 monthly maintenance fee and requires at least \$300 to open. The savings account requires at least \$100 to open and charges no maintenance fees if a balance of \$100 is maintained.

Community Development Services

On an overall basis, SANB provides a good level of community development services that benefits its assessment area. CD services are concentrated in the AA, and some also benefit the Concho Valley, a regional area of 13 counties that includes the AA. A SANB officer was very prominent in helping raise funds for a community development organization (See Specific examples below). SANB is also active in providing technical financial assistance and financial education to local nonprofit organizations that serve low-moderate (LMI) individuals, families and geographies. Organizations that were assisted were involved in three major CD activities - community services, affordable housing, and small business assistance.

Specific examples of qualifying CD services include,

- Concho Resource Center (CRC): A bank officer provided fundraising assistance that made a large impact to this organization. The officer helped raise \$100,000 out of \$683,000 needed by this organization to fund the purchase and expansion of facilities. This expansion is projected to help CRC increase and improve its services to the nine-county regional area that it covers. (See Investment Test, Specific examples for details about this organization).
- United Way of the Concho Valley: Seven bank officers are or have been members of UW's Allocations Committee which makes decisions on funding amounts to the various United Way agencies.
- Habitat for Humanity of San Angelo: Two officers provide homebuyer/homeowner education classes for clients of Habitat.

- Plaza del Sol: A SANB representative is a director and sits on the finance committee for this HUD Section 202 low-income, senior citizen housing facility.
- Meals for the Elderly: A bank officer is on the board and has helped raise funds for this organization which provides meals for low-income elderly.
- Angelo State University Small Business Development Center: A bank officer partnered with this organization to develop the Women in Business Seminar, which is targeted to women in small business. The officer also conducts financial education training and information sessions of this seminar.

Conclusions for Areas Receiving Limited-Scope Reviews

Not Applicable.

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 non-metropolitan 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 (excludes CD Loans): (01/01/98 to 12/31/00) Investment and Service Tests and CD Loans: (09/25/97 to 07/09/01)	
Financial Institution	Products Reviewed	
San Angelo National Bank San Angelo, Texas	CRA Loans, HMDA Loans, Consumer (Motor Vehicle) Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
<i>[Instructions: Provide only if affiliate products are reviewed.]</i> None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
San Angelo MSA #7200	“Full-Scope”	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

San Angelo, TX MSA	B-2
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San Angelo, TX MSA

Demographic Information for Full-Scope Area: San Angelo, TX MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	23	8.70	21.74	47.82	21.74	0.00
Population by Geography	98,458	2.82	20.95	51.69	24.54	0.00
Owner-Occupied Housing by Geography	22,059	1.73	17.31	52.89	28.07	0.00
Businesses by Geography	4,216	14.97	19.23	40.16	25.64	0.00
Farms by Geography	225	4.46	4.02	54.02	37.50	0.00
Family Distribution by Income Level	25,657	2.23	18.50	52.53	26.74	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	9,874	4.72	29.26	51.29	14.73	0.00
Median Family Income = \$29,162						
HUD Adjusted Median Family Income for 2000 = \$43,400						
Households Below the Poverty Level = 5,941						
			Median Housing Value = \$52,051			
			Unemployment Rate = 3.2%			

(*) The NA category consists of geographies that have not been assigned an income classification.
 Sources: 1990 U.S. Census, and 2000 HUD updated MFI.

SANB has one assessment area - San Angelo, Texas MSA. The boundaries of the MSA are the same as those of Tom Green County. The city of San Angelo, Texas is located in the approximate center of the county. It is the largest city within an 85-mile radius and the major trade center for the West Texas agricultural community ranging up to 200 miles. San Angelo is approximately 220 miles northwest of San Antonio, 250 miles southwest of the Dallas/Ft. Worth Metroplex, and 130 miles southeast of Midland/Odessa.

The area's economy is based on agriculture, manufacturing, telecommunications, and information processing. Ranching and farming are based in cotton, cattle, sheep and goats, hay, and sorghum. San Angelo is the largest processing and shipping center for the wool and mohair industry in the United States. The area's agriculture markets continue to suffer due to drought conditions that have existed for the last several years.

Competition for loan and deposit customers includes several financial institutions. There are 12 banks operating in the city of San Angelo. Ten are branch facilities of institutions that are headquartered outside of the MSA, primarily from surrounding counties. In addition, six credit unions serve the area. At 24%, SANB is tied with another bank for having the largest deposit market share in the AA.

The top four employers in the area include Ethicon, San Angelo Packing Company, Lone Star Beef Company and Hirschfeld Steel. These companies on a combined basis represent a majority of manufacturing employment. Other significant employers include the local school

district, Angelo State University, three hospitals, city and county governments, and Goodfellow Air Force Base. The unemployment rate for 2000 was 3.2%.

According to the 1990 U.S. Census data, approximately 98,460 people reside in the MSA representing 35,638 households. The 2000 census population estimate for the San Angelo MSA is 108,938. The 1990 MFI is \$29,162, and the HUD updated MFI for 2001 is \$43,400. Housing statistics from the 1990 census indicate 55% of the AA's housing is owner-occupied

Two community contacts were performed. They indicated the community credit needs to be primarily more flexible lending criteria for small business loans and for purchasing affordable housing.

Appendix C: Tables of Performance Data

Content of Standardized 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: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MSA/assessment area.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MSA/assessment area.
- Table 2. Geographic Distribution of Home Purchase Loans** - 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 market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Small Loans to Businesses** - 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. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Farms** - 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. The table also presents market share information based on the most recent aggregate market data available.
- Table 7. Borrower Distribution of Home Purchase Loans** - 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 MSA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.

- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. Borrower Distribution of Small Loans to Businesses** - 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. Market share information is presented based on the most recent aggregate market data available.
- Table 11. Borrower Distribution of Small Loans to Farms** - 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. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.
- Table 13. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.
- Table 14. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MSA/assessment area.

Table 1. Lending Volume

LENDING VOLUME		State: Texas				Evaluation Period: January 1, 1998 To December 31, 2000						
MSA/Assessment Area:	% of Rated Area Loans (#) in MSA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MSA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full-Review:												
Tom Green County	100	406	20,615	748	38,573	143	8,839	0	0	1,297	68,027	85

(*) Rated area refers to either the state or multistate MSA rating area.
 (**) The evaluation period for Community Development Loans is September 25, 1997 to July 9, 2001.
 (***) Deposit data as of June 30, 2001. Rated area refers to either the state or multistate MSA rating area.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		State: Texas				Evaluation Period: January 1, 1998 To December 31, 2000					Market Share (%) by Geography ***				
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp
	#	% of Total*	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans					
Full-Review:															
Tom Green County	230	100	2	0	17	11	53	52	28	37	4.40	0.00	6.30	4.90	3.70

(*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

(**) Percentage of Owner-Occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(***) Based on 1999 Aggregate HMDA Data only.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		State: Texas					Evaluation Period: January 1, 1998 To December 31, 2000								
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full-Review:															
Tom Green County	140	100	2	4	17	19	53	44	28	33	18.10	80.00	33.30	12.80	17.80

(*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

(**) Percentage of Owner-Occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.

(***) Based on 1999 Aggregate HMDA Data only.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		State: Texas				Evaluation Period: January 1, 1998 To December 31, 2000					Market Share (%) by Geography ***				
MSA/Assessment Area:	Total Home Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Over all	Low	Mod	Mid	Upp
	#	% of Total*	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans	% Owner OCC Units**	% BANK Loans					
Full-Review:															
Tom Green County	32	100	2	0	17	16	53	44	28	41	0.80	0.00	1.80	0.60	0.90

(*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.
 (**) Percentage of Owner-Occupied Units is the number of owner-occupied housing units in a particular geography divided by the number of owner-occupied housing units in the area based on 1990 Census information.
 (***) Based on 1999 Aggregate HMDA Data only.

Table 5. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			State: Texas				Evaluation Period: January 1, 1998 To December 31, 2000								
MSA/Assessment Area:	Total Small Loans To Businesses		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	% of Businesses**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Tom Green County	748	100	16	12	17	15	42	39	25	33	27.40	28.60	29.00	25.10	23.10

(*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

(**) Source of Data-Dunn and Bradstreet.

(***) Based on 1999 Aggregate Small Business Data only.

Table 6. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		State: Texas					Evaluation Period: January 1, 1998 To December 31, 2000								
MSA/Assessment Area:	Total Small Loans To Farms		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ***				
	#	% of Total*	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full-Review:															
Tom Green County	143	100	4	1	4	3	60	69	32	26	60.00	33.30	50.00	55.60	59.10

(*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

(**) Source of Data-Dunn and Bradstreet.

(***) Based on 1999 Aggregate Small Farm Data only.

Table 7. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		State: Texas					Evaluation Period: January 1, 1998 To December 31, 2000									
MSA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****					
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	Over all	Low	Mod	Mid	Upp	
Full-Review:																
Tom Green County	230	100	20	7	19	27	22	24	39	43	4.40	6.20	6.20	5.10	6.10	

(*) Home purchase loans originated and purchased in the MSA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
 (**) Percentage of Families is based on 1990 Census information.
 (***) As a percentage of loans with borrower income information available. No information was available for 0% of loans originated and purchased by the bank.
 (****) Based on 1999 Aggregate HMDA Data only.

Table 8. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		State: Texas					Evaluation Period: January 1, 1998 To December 31, 2000								
MSA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****				
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp
Full-Review:															
Tom Green County	140	100	20	17	19	25	22	18	39	36	18.10	33.30	30.40	16.70	10.70

(*) Home improvement loans originated and purchased in the MSA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

(**) Percentage of Families is based on 1990 Census information.

(***) As a percentage of loans with borrower income information available. No information was available for 4% of loans originated and purchased by the bank.

(****) Based on 1999 Aggregate HMDA Data only.

Table 9. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												State: Texas		Evaluation Period: January 1, 1998 To December 31, 2000				
MSA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share (%) by Borrower Income****							
	#	% of Total*	% of Families**	% BANK Loans***	% of Families**	% BANK Loans**	% of Families**	% BANK Loans***	% of Families**	% BANK Loans***	Overall	Low	Mod	Mid	Upp			
Full-Review:																		
Tom Green County	32	100	20	0	19	6	22	6	39	56	0.80	0.00	0.00	0.70	1.30			

(*) Home mortgage refinance loans originated and purchased in the MSA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.
 (**) Percentage of Families is based on 1990 Census information.
 (***) As a percentage of loans with borrower income information available. No information was available for 31% of loans originated and purchased by the bank.
 (****) Based on 1999 Aggregate HMDA Data only.

Table 10. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					State: Texas		Evaluation Period: January 1, 1998 To December 31, 2000		
	Total Small Loans to Businesses		Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Tom Green County	748	100	91	75	85	5	4	27.41	32.56

(*) Small loans to businesses originated and purchased in the MSA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.
 (**) Businesses with revenues of \$1 million or less as a percentage of all businesses.
 (***) Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 7% of small loans to businesses originated and purchased by the bank.
 (****) Based on 1999 Aggregate Small Business Data only.

Table 11. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		State: Texas		Evaluation Period: January 1, 1998 To December 31, 2000					
	Total Small Loans to Farms		Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share****	
	#	% of Total*	% of Businesses**	% BANK Loans***	\$100,000 or Less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 million or less
Full-Review:									
Tom Green County	143	100	97	89	76	20	1	60.00	60.29

(*) Small loans to farms originated and purchased in the MSA/AA as a percentage of all small loans to farms originated and purchased in the rated area.
 (**) Farms with revenues of \$1 million or less as a percentage of all businesses.
 (***) Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 2% of small loans to businesses originated and purchased by the bank.
 (****) Based on 1999 Aggregate Small Farm Data only.

Table 12. Qualified Investments

QUALIFIED INVESTMENTS		State: Texas		Evaluation Period: September 25, 1997 To July 9, 2001					
MA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$'s	#	\$ (000's)
Full-Review:									
Tom Green County	0	0	5	84	5	84	100	0	0

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

(**) "Unfunded Commitments" means legally binding investment commitments that are tracked and recorded by the bank's financial reporting system.

Table 13. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS										State: Texas				Evaluation Period: September 25, 1997 To July 9, 2001			
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full-Review:																	
Tom Green County	100	2	2	1	0	1	0	1	0	0	0	-1	0	3	21	52	24

Table 14. Geographic and Borrower Distribution of Consumer Loans (Institution's Option)

Geographic and Borrower Distribution: CONSUMER LOANS										State: Texas		Evaluation Period: January 1, 1998 To December 31, 2000							
MSA/Assessment Area:	Total Consumer Loans		Geographic Distribution								Borrower Distribution								
			Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		
	#	% of Total**	% of Hhlds*	% BAN K Loans	% of Hhlds*	% BAN K Loans	% of Hhlds*	% BAN K Loans	% of Hhlds*	% BAN K Loans	% of Hhlds*	% BAN K Loans	% of Hhlds*	% BAN K Loans	% of Hhlds*	% BAN K Loans	% of Hhlds*	% BAN K Loans	
Full-Review:																			
Tom Green County	1,966	100	3	4	19	17	51	48	26	31	24	18	16	30	20	24	41	28	

(*) Percentage of Households (Hhlds) is based on 1990 Census information.

(**) Consumer loans originated and purchased in the MSA/AA as a percentage of all consumer loans originated and purchased in the rated area.