

PUBLIC DISCLOSURE

November 17, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Texas Community Bank
RSSD # 528960
6721 McPherson Road
Laredo, Texas 78041

Federal Reserve Bank of Dallas
2200 North Pearl Street
Dallas, Texas 75201

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION’S COMMUNITY REINVESTMENT ACT RATING: Texas Community Bank is rated **Satisfactory**.

The following table indicates the Community Reinvestment Act (CRA) performance level of Texas Community Bank (TCB or bank) with respect to the lending, investment, and service tests.

Texas Community Bank			
Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			X
Low Satisfactory	X	X	
Needs to Improve			
Substantial Non-Compliance			

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

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors supporting the institution’s rating include:

Lending Test

- Lending activity reflects adequate responsiveness and record of serving the credit needs of the assessment areas (AAs), including low- and moderate-income (LMI) individuals, LMI areas, and small businesses.
- A substantial majority of loans are made in the bank’s AAs.
- The geographic distribution of loans reflects good penetration throughout the AAs.
- TCB’s distribution of loans among individuals of different income levels, including LMI individuals, and businesses of different revenue sizes is good.
- The bank makes an adequate level of community development (CD) loans.
- TCB makes limited use of innovative and/or flexible lending practices in serving AAs’ needs.

Investment Test

- TCB has an adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors, and is rarely in a leadership position.
- TCB makes occasional use of innovative and/or complex investments to support CD initiatives.
- The bank exhibits adequate responsiveness to credit and CD needs.

Service Test

- Delivery systems are reasonably accessible to individuals of different income levels throughout the bank’s AAs.
- The bank’s services do not vary in a way that inconveniences the bank’s AAs, particularly LMI geographies and/or LMI individuals.
- TCB provides a relatively high level of CD services.

INSTITUTION

DESCRIPTION OF THE INSTITUTION

TCB, a financial institution headquartered in Laredo, Texas, has the following characteristics.

- The bank is wholly owned by Vision Bancshares, Inc., headquartered in Laredo, Texas.
- As of June 30, 2025, TCB reported total assets of approximately \$2.1 billion and gross loans of \$1.1 billion.
- TCB delineates five AAs in the state of Texas that remain unchanged since the prior evaluation dated October 23, 2023.
- The bank operates 10 branch offices and 16 full-service automated teller machines (ATMs) throughout its AAs.
- TCB offers traditional deposit and loan products to meet the needs of the communities it serves.
 - The bank is predominately a commercial lender, with commercial loans representing 81.6 percent of its loan portfolio as of June 30, 2025. Commercial loans are made for a variety of business purposes, including interim construction of industrial and commercial properties; equipment, inventories, and accounts receivable; and acquisition financing.
 - Residential real estate loans comprise 14.6 percent of the bank’s loan portfolio.
 - TCB offers a wide variety of consumer loan products, including auto loans, secured and unsecured installment loans, personal open-end lines of credit, and lot loans. In addition, the bank offers agricultural loans. As shown in Table 1, consumer open- and closed-end loans account for only 1.9 percent of the total loan portfolio while agricultural loans represent 1.7 percent. Given that these loans are immaterial, they are not discussed further in this evaluation.
- TCB’s ability to meet various credit needs of the communities it serves has not been hampered by its capacity to lend, financial condition and size, product offerings, prior performance, legal impediments, or other factors.

Table 1 below reflects TCB’s loan portfolio mix as of June 30, 2025.

Table 1

Composition of Loan Portfolio as of June 30, 2025		
Loan Type	\$(000)	Percent (%)
Residential Real Estate	162,772	14.6
Agricultural	18,541	1.7
Commercial	909,513	81.6
Consumer Closed-End	18,397	1.7
Consumer Open-End	2,656	0.2
Other	2,675	0.2
Gross Loans	1,114,554	100.0
Note: Percentages may not total 100.0 percent due to rounding.		

The Federal Reserve Bank of Dallas rated the bank’s CRA performance as **Satisfactory** at the previous performance evaluation dated October 23, 2023. The bank received a *High Satisfactory* rating under the lending test, a *Low Satisfactory* rating under the investment test, and a *Needs to Improve* rating under the service test.

SCOPE OF EVALUATION

Examiners utilized the Federal Financial Institutions Examination Council’s (FFIEC’s) *Interagency Examination Procedures for Large Institutions* to evaluate TCB’s CRA performance. The evaluation considered relevant performance context, including the bank’s asset size, financial condition, business strategy, and market competition, as well as the demographic and economic characteristics of the AAs and their credit needs.

To conduct the evaluation, examiners relied on the following bank data:

- Residential real estate lending data reported in the 2023 and 2024 Home Mortgage Disclosure Act (HMDA) Loan/Application Registers,
- Small business lending data reported in the 2023 and 2024 CRA registers, and
- CD loans, investments, and services extended from October 1, 2023, through September 30, 2025, including prior period investments.

While the review considered small business and HMDA loan data, overall conclusions regarding lending performance are largely based on TCB’s small business lending, as commercial lending accounts for a majority of the bank’s lending portfolio.

As shown in Table 2, TCB has five delineated AAs in the state of Texas: Laredo Metropolitan Statistical Area (MSA) AA, San Antonio Metropolitan AA, McAllen MSA AA, Brownsville MSA AA, and Val Verde County Nonmetropolitan AA. Examiners conducted full-scope reviews for two of the five AAs: Laredo MSA AA and San Antonio Metropolitan AA. Factors to determine which AAs would receive full-scope reviews include, but are not limited to, number of branch locations and volume of deposits, loans, and CD activities during the review period. Overall, 71.0 percent of TCB’s total lending activity (by number of loans), 83.2 percent of total deposits, and 40.0 percent of total branches were evaluated through full-scope reviews.

Table 2

Assessment Area Delineation and Scope of Review		
Assessment Area Name	Assessment Area Description	Scope of Review Received
Laredo MSA	Webb County, TX Entire Laredo MSA	Full-Scope
San Antonio Metropolitan	Atascosa County, TX Bexar County, TX Part of San Antonio MSA	Full-Scope
McAllen MSA	Hidalgo County, TX Entire McAllen MSA	Limited-Scope
Brownsville MSA	Cameron County, TX Entire Brownsville MSA	Limited-Scope
Val Verde County Nonmetropolitan	Val Verde County, TX	Limited-Scope

The Laredo MSA AA accounts for 75.0 percent of deposit volume and 60.0 percent of loan volume and continues to be a key area of focus and growth. As such, TCB’s performance in the Laredo MSA AA carried more weight in drawing conclusions regarding the bank’s overall performance than other AAs.

Evaluation Analysis

The evaluation of the bank's lending record in the individual AAs includes the use of and comparison to demographic characteristics. The primary sources for the demographic information are 2016-2020 U.S. Census Bureau's American Community Survey (ACS) data as well as Dun & Bradstreet (D&B) data for 2023 and 2024. Demographic characteristics of a particular AA are useful in analyzing the bank's record of lending, as they provide a means of estimating loan demand and identifying lending opportunities. To understand small businesses, examiners relied on D&B data, which consists of self-reported data of revenue size and geographical location by businesses entities. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers; rather, the information is used to understand the bank's performance in the context of available data. Lastly, examiners conducted interviews with two representatives of community organizations that promote economic development in the AAs receiving a full-scope review to better understand the credit needs, opportunities, and challenges of the areas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

TCB's overall lending test performance is **Low Satisfactory**. Lending activity reflects adequate responsiveness to AAs' credit needs. The geographic distribution of loans reflects good penetration throughout the AAs, and the overall distribution of loans by borrower income and revenue size of the business is good. TCB makes an adequate level of CD loans. The bank's small business lending received greater weight in determining the overall lending test performance, as it is a strategic focus and represents a larger portion of TCB's loan portfolio.

Lending Activity

This performance criterion evaluates the bank's lending volume considering relevant performance context.

TCB's overall lending levels between January 1, 2023, and December 31, 2024 (review period) reflect adequate responsiveness to the credit needs of the delineated AAs. As shown in Table 3, the bank made significantly more small business loans than HMDA loans. TCB's overall loan volume since the prior evaluation decreased given the rising interest rate environment and the cessation of the Small Business Administration's (SBA's) Paycheck Protection Program (PPP) in response to the COVID-19 pandemic. Therefore, the decline in loan volume does not reflect poorly on the bank's performance. TCB makes limited use of innovative and/or flexible lending programs to serve AAs' credit needs. The bank participates in industry-recognized, government-guaranteed lending programs, such as Veterans Affairs and Federal Housing Administration mortgage loans, displaying flexibility in serving the credit needs of its communities. Lending programs offered by the bank include Federal Housing Administration and Veterans Affairs loans for consumers seeking residential real estate loans.

Table 3

Summary of Lending Activity January 1, 2023 through December 31, 2024				
Loan Type	#	%	\$(000)	%
Home Purchase	73	2.9	27,303	8.6
Refinancing	25	1.0	28,012	8.8
Home Improvement	14	0.5	793	0.2
Multifamily	22	0.9	30,654	9.6
Other Purpose Closed/Exempt	6	0.2	1,715	0.5
Total HMDA	140	5.5	88,477	27.8
Total Small Business	2,287	89.8	222,479	69.8
Total Small Farm	119	4.7	7,768	2.4
Total Loans	2,546	100.0	318,724	100.0

Note: Discrepancies are possible in dollar amount totals due to rounding.

Assessment Area Concentration

This performance criterion evaluates the volume and percentage of HMDA- and CRA-reported loans extended inside and outside of the bank’s delineated AAs.

As depicted in Table 4, TCB extends a substantial majority of its loans within its AAs, demonstrating a strong commitment to meeting their credit needs. Examiners placed more weight on the number of loans extended instead of the dollar amount. When considering lending by dollar amount, the bank originated a small number of high-dollar HMDA outside its delineated AAs, which were exceptions to TCB’s general lending patterns. Moreover, the bank originated 90.9 percent of small business loans, by dollar amount, inside the AAs. Given that small business lending is TCB’s strategic focus and primary product, this effort confirms the bank’s commitment to meeting the credit needs of its AAs and reflects well on TCB’s overall performance.

Table 4

Lending Inside and Outside of the Assessment Areas								
Loan Types	Inside Assessment Areas				Outside Assessment Areas			
	#	%	\$(000)	%	#	%	\$(000)	%
Home Purchase	60	82.2	19,411	71.1	13	17.8	7,892	28.9
Refinancing	23	92.0	4,172	14.9	2	8.0	23,840	85.1
Home Improvement	12	85.7	603	76.0	2	14.3	190	24.0
Multifamily	19	86.4	13,497	44.0	3	13.6	17,157	56.0
Other Purpose Closed/Exempt	6	100.0	1,715	100	0	0.0	0	0.0
Total HMDA	120	85.7	39,398	44.5	20	14.3	49,079	55.5
Total Small Business	2,169	94.8	202,196	90.9	118	5.2	20,283	9.1
Total Small Farm	100	84.0	5,859	75.4	19	16.0	1,909	24.6
TOTAL LOANS	2,389	93.8	247,453	77.6	157	6.2	71,271	22.4

Note: Discrepancies are possible in dollar amount totals and percentages due to rounding.

The remaining loan distribution analyses discussed in this performance evaluation consider only those loans originated within the bank’s AAs.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs.

TCB's overall geographic distribution of lending reflects good penetration among the different census tracts and dispersion throughout its AAs. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria for each AA.

Lending to Borrowers of Different Income Levels and Businesses of Different Revenue Sizes

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes.

TCB's lending distribution reflects good penetration among individuals of different income levels and businesses of different revenue sizes. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each AA.

Community Development Lending

This performance criterion evaluates the bank's level of CD lending.

TCB makes an adequate level of CD loans. The bank originated or renewed 18 CD loans totaling approximately \$27.2 million during the review period. The largest portion of the CD lending was in the Laredo MSA AA, which aligns with TCB's strategic focus. CD loans originated during the review period were extended for a variety of purposes, as noted in Table 5. Since the previous evaluation, the bank's CD lending decreased by 39.3 percent due to the cessation of PPP lending in May 2021. Despite the decline, TCB demonstrates adequate responsiveness to the credit needs of its AAs, particularly low-income individuals and very small businesses. A substantial majority of TCB's CD-lending has the primary purpose of affordable housing, which reflects favorably on the bank's performance as it is a CD need within the bank's AAs.

Examiners considered three qualified CD loans, totaling \$9.3 million, benefiting a broader statewide or regional area that includes TCB's AAs given that the bank adequately met the CD needs of its AAs. Specifically,

- TCB extended two loans totaling \$5.0 million to a nonprofit organization that provides affordable housing and community service programs to LMI individuals.
- The bank extended a \$4.3 million loan to construct a multifamily housing project where over 50.0 percent of the units are restricted to LMI individuals/families, specifically earning 50.0 percent to 80.0 percent of the area median income.

Details regarding the CD lending can be found in the Conclusions with Respect to Performance Tests section for each AA.

Table 5

Community Development Lending Assessment Area: All		
Purpose	#	\$(000)
Affordable Housing	15	20,612
Community Services	2	5,000
Economic Development	0	0
Revitalization and Stabilization	1	1,640
Total	18	27,252

Note: Discrepancies are possible in dollar amount totals due to rounding.

INVESTMENT TEST

The bank’s overall investment test rating is **Low Satisfactory**.

This performance criterion evaluates the bank’s level of qualifying investments, grants, and donations made since the prior evaluation that have a primary purpose of CD. TCB has an adequate level of qualified CD investments and donations, particularly those not routinely provided by private investors. The volume and amount of such investments and grants rarely positions the bank as a leader. Additionally, TCB makes occasional use of innovative and/or complex investments to support CD initiatives while exhibiting adequate responsiveness to CD needs. The bank extended equity investments to a community development financial institution (CDFI) specifically dedicated to affordable housing initiatives operating in the AAs. The investments were eligible for the low-income housing tax credit, which funds housing projects that meet certain rent affordability requirements. Specifically, the nonprofit organization acquired and rehabilitated foreclosed and/or donated homes within Webb, Bexar, Atascosa, Hidalgo, Cameron, and Val Verde counties. Additionally, TCB's investments targeted small business investment corporations (SBICs), which promote economic development by supporting small businesses. The SBICs operate across broader geographic regions that target the bank’s AAs, including the counties of Webb, Bexar, Atascosa, Hidalgo, Cameron, and Val Verde. Since these investments benefit more than one of the delineated AA, the investment activity is reflected at the institution level rather than in a specific AA. Since the previous examination, TCB’s CD investments increased by 117.3 percent, demonstrating its commitment to meeting the CD community needs.

TCB’s CD donations remain consistent with the prior evaluation despite the shorter review period. The donations were responsive to nonprofit organizations that targeted LMI individuals and families. During this review period, the bank donated to organizations operating in areas designated by the FFIEC as distressed due to poverty and unemployment and supported local organizations that provide community services and affordable housing targeted to LMI individuals throughout the delineated AAs.

Table 6 illustrates TCB’s overall level of CD investments. Specific details regarding investments, grants, and donations can be found in the Conclusions with Respect to Performance Tests section for each AA.

Table 6

Investments, Grants, and Donations Assessment Area: All								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	1	500	1	500	26	117	28	1,117
Community Services	2	2,774	1	3,735	108	377	111	6,886
Economic Development	2	1,000	2	900	0	0	4	1,900
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	5	4,274	4	5,135	134	494	143	9,902

¹ Book value of investment
² Original market value of investment
Note: Discrepancies are possible in dollar amount totals due to rounding.

SERVICE TEST

The bank’s overall service test rating is **High Satisfactory**.

Retail Services

This performance criterion evaluates the bank’s level of delivery systems provided in each geography classification. TCB’s branch locations, drive-through facilities, and alternative delivery systems, such as online and mobile banking, are reasonably accessible to the bank’s geographies and individuals of different income levels in the AAs. As shown in Table 7, TCB’s branch network reasonably aligns with the distribution of census tracts, households, and businesses throughout its AAs. Given that TCB has not opened or closed any branches since the previous evaluation, examiners did not evaluate the bank’s record of opening or closing branches. Banking services and hours of operations do not vary in a way that inconveniences the AAs, particularly LMI geographies and/or individuals. Specific details regarding retail services can be found in the Conclusions with Respect to Performance Tests section for each AA.

Table 7

Branch and Deposit Taking ATM Locations Assessment Area: All								
Tract Income	Census Tracts		% of Households	% of Businesses	Branches		Deposit-Taking ATMs	
	#	%			#	%	#	%
Low	54	6.7	5.8	5.3	1	10.0	1	6.3
Moderate	263	32.7	31.2	26.4	1	10.0	2	12.5
Middle	251	31.2	32.1	28.6	3	30.0	6	37.5
Upper	217	27.0	30.3	38.9	5	50.0	7	43.8
Unknown	20	2.5	0.6	0.8	0	0.0	0	0.0
Total	805	100.0	100.0	100.0	10	100.0	16	100.0

Note: Discrepancies are possible in percentages due to rounding.

Community Development Services

This performance criterion evaluates the bank’s level of CD services. Overall, TCB provides a relatively high level of CD services. During the review period, bank representatives provided 283 services totaling 3,456 hours to 170 organizations. A significant portion of the services were extended to local organizations that provide varying levels of community services to LMI individuals and families in the bank’s AAs. Despite the shortened review period, TCB increased the number of CD services provided by 25.2 percent and the number of hours by 1,189.6 percent. TCB’s employees engaged in a variety of community services, including serving on the board of directors for organizations focused on assisting LMI individuals and participating in financial literacy courses to educate LMI students and small business owners. Noteworthy examples of the bank’s community services include:

- TCB partners with a local franchise to provide financial literacy training directly to its employees. Bank employees facilitate weekly 60-minute courses covering credit and debt management skills, banking, and budgeting. This activity was responsive as the hourly employees are classified as LMI, and this service directly addresses the critical need for financial education within the community as highlighted by community contacts. The alliance with this franchise allowed TCB to overcome barriers through outreach and directly impact the LMI population. TCB dedicated over 60 hours to this organization by bridging the financial gap.
- Bank employees provided over 80 hours of technical assistance to small business owners within the AAs focusing on financial documentation and creditworthiness. This activity promotes economic development by supporting small businesses within the AAs and provides the foundation of small business lending.

Table 8

Community Development Services		
Assessment Area: All		
Purpose	#	Hours
Affordable Housing	1	35
Community Services	273	3,196
Economic Development	9	225
Revitalization and Stabilization	0	0
Total	283	3,456

Details regarding CD services can be found in the Conclusions with Respect to Performance Tests section for each AA.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Compliance with the substantive provisions of antidiscrimination and other consumer protection laws and regulations, including the Equal Credit Opportunity Act and the Fair Housing Act, was considered as part of this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

LAREDO METROPOLITAN STATISTICAL AREA ASSESSMENT AREA
(Full-Scope Review)

DESCRIPTION OF OPERATIONS IN LAREDO METROPOLITAN STATISTICAL AREA ASSESSMENT AREA

- The Laredo MSA AA is comprised of Webb County, which represents the entire Laredo MSA. There have been no changes to the delineation of the AA since the previous evaluation. Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- The AA is comprised of 69 census tracts, of which 4.3 percent are designated as low-income, 44.9 percent as moderate-income, 18.8 percent as middle-income, 29.0 percent as upper-income, and 2.9 percent are designated as unknown-income.
- TCB operates three full-service branches in the AA, representing 30.0 percent of its branches. Of the three branches, one is located in a middle-income census tract and two are located in upper-income census tracts.
- According to the Federal Deposit Insurance Corporation (FDIC) Market Share Report as of June 30, 2025, TCB held 16.2 percent of the deposit market share, ranking second out of 10 FDIC-insured depository institutions operating in the AA. International Bank of Commerce holds the largest market share at 35.1 percent while Falcon International Bank has the third largest market share at 14.5 percent.
- In 2024, the bank ranked third among 77 institutions reporting CRA lending activity. Of the total 7,295 loans originated, TCB extended to 691 (9.5 percent). American Express National Bank ranked first, with 1,716 originations or 23.5 percent. JPMorgan Chase Bank ranked second, with 802 originations or 11.0 percent.
- In 2024, 177 institutions originated or purchased 3,373 HMDA-reportable loans in the AA. TCB ranked 24th, with 32 home mortgage originations, representing 0.9 percent of the total reportable loans in the AA.
- A community contact noted that affordable housing, small business lending (particularly to startup businesses), and workforce development are needs within the AA.

Table 9

Population Change			
Assessment Area: Laredo MSA			
Area	2015 Population	2020 Population	Percent Change
Laredo MSA	263,251	267,114	1.5
Texas	26,538,614	29,145,505	9.8
<i>Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census</i>			

- As reflected in Table 9, the AA population remained relatively stable between 2015 and 2020, increasing by 1.5 percent, while the state of Texas population grew by 9.8 percent.
- According to the Laredo Morning Times, the lack of job opportunities, low wages, and limited access to resources and services may contribute to the slow population growth in the AA.¹

¹ Vela, Jorge A. "Study: Laredo Ranked 5th "Least Prosperous Metro" in Nation." *Laredo Morning Times*, 23 Jan. 2023, www.lmtonline.com/local/article/Laredo-is-5th-least-prosperous-metro-in-the-17728877.php.

Table 10

Median Family Income Change			
Assessment Area: Laredo MSA			
Area	2015 Median Family Income (\$)	2020 Median Family Income (\$)	Percent Change
Laredo MSA	45,803	54,078	18.1
Texas	68,523	76,073	11.0

*Source: 2011 - 2015 U.S. Census Bureau American Community Survey
2016 - 2020 U.S. Census Bureau American Community Survey
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.*

- As indicated in Table 10, the AA’s median family income (MFI) grew by 18.1 percent between 2015 and 2020, exceeding the state of Texas growth rate of 11.0 percent. Despite growing at a higher rate, the AA MFI remains lower than the state of Texas’ MFI by \$21,995.
- According to ACS data, approximately 61,334 families reside in the AA. Of which 40.5 percent of the families are considered LMI.
- Per the 2023 FFIEC Census Data, 22.3 percent of families in the AA live below the poverty level, which is higher than the statewide percentage of 10.9 percent.
- The Laredo Morning Times² noted that Laredo ranked fifth as the least prosperous metropolitan area in the nation. Community contacts confirmed these observations, noting resource availability and job opportunities as community needs.

Table 11

Housing Cost Burden						
Assessment Area: Laredo MSA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Laredo MSA	77.3	38.7	43.8	61.9	34.9	23.7
Texas	79.4	49.8	43.5	59.0	32.7	19.4

*Cost burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy*

- As highlighted in Table 11, the housing cost burden for LMI renters in the AA is lower in comparison to the statewide LMI renters, while the cost burden for LMI homeowners is higher than statewide LMI homeowners. It is more economical for LMI families in the AA to purchase a home rather than rent. However, factors such as downpayment requirements, rising interest rates, and income verification requirements act as barriers for many LMI families seeking homeownership.
- Of the 84,553 housing units in the AA, 56.9 percent are owner-occupied, 33.5 percent are rental units, and 9.7 percent are vacant.
- The median age of housing stock in the AA is 35 years, with a median housing value of \$134,965, which is below the state’s median housing value of \$187,200. This data point indicates it is more affordable to own a home in the AA compared to the state of Texas.

² Vela, Jorge A. “Study: Laredo Ranked 5th “Least Prosperous Metro” in Nation.” *Laredo Morning Times*, 23 Jan. 2023, www.lmtonline.com/local/article/Laredo-is-5th-least-prosperous-metro-in-the-17728877.php.

- A community contact noted that affordable housing is an AA need and that LMI families face fundamental challenges, such as lack of general banking knowledge and financial literacy, to attain homeownership.

Table 12

Unemployment Rates					
Assessment Area: Laredo MSA					
Area	2020	2021	2022	2023	2024
Laredo MSA	8.8	6.4	4.2	4.1	4.2
Texas	7.7	5.6	3.9	4.0	4.1

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- As shown in Table 12, the AA unemployment rates have decreased and stabilized since the 2020 COVID-19 pandemic while trending slightly above the statewide rates.
- Transportation and warehousing are major industries within the AA. The Port of Laredo is a major trade hub, as the largest port in the United States, Inland Port on the US-Mexico Border, and Railroad Interchange on the US-Mexico Border. This port is an essential economic driver of the AA.
- Major employers in the AA include Concentrix, FedEx Freight, H-E-B, International Bank of Commerce, and Laredo Medical Center.
- A community contact stated that economic conditions have slightly increased retail services; however, a minimal number of qualified applicants are available to secure new employment in retail and restaurant spaces.

The following table details selected characteristics of the AA.

Table 13

2024 Laredo MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	4.3	2,034	3.3	955	47.0	15,840	25.8
Moderate	31	44.9	23,602	38.5	8,064	34.2	9,031	14.7
Middle	13	18.8	10,272	16.7	2,142	20.9	10,767	17.6
Upper	20	29.0	25,415	41.4	2,474	9.7	25,696	41.9
Unknown	2	2.9	11	0.0	0	0.0	0	0.0
Total AA	69	100.0	61,334	100.0	13,635	22.2	61,334	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,444	1,374	2.9	39.9	1,446	42.0	624	18.1
Moderate	33,851	15,736	32.7	46.5	14,312	42.3	3,803	11.2
Middle	14,391	7,727	16.1	53.7	5,400	37.5	1,264	8.8
Upper	32,856	23,256	48.4	70.8	7,120	21.7	2,480	7.5
Unknown	11	0	0.0	0.0	11	100.0	0	0.0
Total AA	84,553	48,093	100.0	56.9	28,289	33.5	8,171	9.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	413	4.7	372	4.7	35	4.4	6	9.4
Moderate	2,309	26.2	2,117	26.7	177	22.4	15	23.4
Middle	1,310	14.9	1,213	15.3	89	11.3	8	12.5
Upper	4,729	53.8	4,209	53.0	486	61.4	34	53.1
Unknown	36	0.4	31	0.4	4	0.5	1	1.6
Total AA	8,797	100.0	7,942	100.0	791	100.0	64	100.0
Percentage of Total Businesses:			90.3		9.0		0.7	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	3	3.6	3	3.7	0	0.0	0	0.0
Moderate	19	22.6	19	23.5	0	0.0	0	0.0
Middle	10	11.9	10	12.3	0	0.0	0	0.0
Upper	52	61.9	49	60.5	3	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	84	100.0	81	100.0	3	100.0	0	0.0
Percentage of Total Farms:			96.4		3.6		0.0	

Source: 2024 FFIEC Census Data
 2024 Dun & Bradstreet Data
 2016-2020 U.S. Census Bureau: American Community Survey
 Note: Percentages may not total 100.0 percent due to rounding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

TCB's lending performance in the Laredo MSA AA is adequate. Lending activity reflects adequate responsiveness to AA credit needs, including low-income individuals and areas as well as very small businesses. The geographic distribution of loans reflects good penetration throughout AA. In addition, the distribution of borrowers reflects good penetration among borrowers of different income levels and small businesses of different revenue sizes. Additionally, the bank makes an adequate level of CD loans.

Lending Activity

The bank's lending activity in the Laredo MSA AA reflects adequate responsiveness and makes limited use of innovative and/or flexible lending practices in serving the AA communities.

During the review period, TCB originated 67 HMDA reportable loans and 1,420 small business loans. The volume of small business lending decreased since the previous evaluation, primarily due to the cessation of PPP lending, coupled with a rising interest rate environment, which decreases loan demand. However, the loan products and volume appear consistent with the credit needs of the bank's AA. The number of small business and HMDA loans extended by the bank was compared against the number of loans made by aggregate lenders during the review period given the high level of competition. Of the 177 financial institutions reporting HMDA lending in 2024, TCB ranked 24th accounting for 0.9 percent of all HMDA loans originated or purchased in Laredo MSA AA. Additionally, the bank ranked 3rd among 77 institutions reporting CRA small business lending in the AA in 2024, with a market share of 9.5 percent. National and regional institutions dominate the mortgage and small business markets, with Prime Lending and American Express dominating these markets, respectively.

As previously mentioned, TCB is primarily a commercial lender and strategically applies its resources to meet the credit needs of small businesses in the AA. While the bank offers HMDA-reportable loans, this is not a strategic priority and represents a small percentage of the lending. Given the very low number of HMDA reportable loans and the bank's strategic focus, small business loans carried heavier weight when evaluating the bank's performance.

Table 14

Summary of Lending Activity				
January 1, 2023 through December 31, 2024				
Assessment Area: Laredo MSA				
Loan Type	#	%	\$(000)	%
Home Purchase	26	1.8	11,242	4.6
Refinancing	17	0.8	2,983	1.2
Home Improvement	8	0.8	453	0.2
Multifamily	14	1.0	9,369	3.8
Other Purpose Closed/Exempt	2	0.0	651	0.3
Total HMDA	67	4.3	24,698	14.4
Total Small Business	1,420	91.4	143,214	83.6
Total Small Farm	67	4.3	3,482	2.0
TOTAL LOANS	1,554	100.0	171,394	100.0

Note: Discrepancies are possible in dollar amount totals due to rounding.

Geographic Distribution of Loans

For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared to available demographic information. Performance context and aggregate lending data were taken into consideration. In addition, a separate evaluation of the HMDA products was not performed, as the volume of originations would not have allowed for a meaningful analysis.

The bank's geographic distribution of loans reflects good penetration among geographies of different income levels throughout the AA. Loans were generally made in close proximity to the bank's branches, with no conspicuous gaps or anomalies in the lending patterns. Furthermore, the distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions reached about TCB's performance in LMI geographies.

Residential Real Estate (HMDA) Lending

TCB's geographic distribution of HMDA loans reflects good penetration throughout the AA despite limited availability of owner-occupied homes in LMI geographies and the high level of competition the bank. In 2023 and 2024, TCB's home mortgage lending in low-income census tracts outpaced the performance of aggregate lenders and the percentage of owner-occupied units (demographic figure). Among moderate-income census tracts, the bank performed slightly below the aggregate lending data and demographic figure in 2023; however, it was comparable. In 2024, the bank exceeded aggregate lender performance in moderate-income tracts while falling slightly below the demographic figure.

Table 15A

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Laredo MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	1	7.7	0.5	70	1.9	0.4	1	7.7	0.8	68	0.9	0.7	2.9
Moderate	2	15.4	30.4	296	8.1	23.7	5	38.5	29.3	4,784	63.0	23.2	32.7
Middle	2	15.4	14.2	413	11.3	13.4	1	7.7	13.3	46	0.6	13.4	16.1
Upper	8	61.5	54.9	2,873	78.7	62.5	6	46.2	56.5	2,692	35.5	62.8	48.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	13	100.0	100.0	3,652	100.0	100.0	13	100.0	100.0	7,590	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.1	0	0.0	0.7	0	0.0	2.0	0	0.0	1.5	2.9
Moderate	3	27.3	28.0	404	24.2	21.9	0	0.0	22.4	0	0.0	16.3	32.7
Middle	3	27.3	12.6	265	15.9	9.7	1	16.7	13.3	95	7.2	10.2	16.1
Upper	5	45.5	58.2	1,000	59.9	67.6	5	83.3	62.3	1,219	92.8	71.9	48.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	11	100.0	100.0	1,669	100.0	100.0	6	100.0	100.0	1,314	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	1	16.7	0.0	60	15.3	0.0	2.9
Moderate	0	0.0	18.2	0	0.0	14.7	3	50.0	22.4	158	40.2	21.3	32.7
Middle	1	50.0	16.7	40	66.7	9.3	1	16.7	10.4	75	19.1	10.2	16.1
Upper	1	50.0	65.2	20	33.3	75.9	1	16.7	67.2	100	25.4	68.5	48.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	60	100.0	100.0	6	100.0	100.0	393	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	1	14.3	0.0	248	12.0	0.0	0	0.0	0.0	0	0.0	0.0	3.6
Moderate	4	57.1	58.3	1,333	64.4	19.3	2	28.6	38.9	525	7.2	11.1	40.3
Middle	2	28.6	16.7	489	23.6	5.8	1	14.3	27.8	145	2.0	22.4	22.9
Upper	0	0.0	25.0	0	0.0	74.9	4	57.1	33.3	6,629	90.8	66.5	33.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	2,070	100.0	100.0	7	100.0	100.0	7,299	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	2	5.7	0.6	318	3.9	0.4	2	6.3	0.9	128	0.8	0.7	2.9
Moderate	10	28.6	29.3	2,148	26.5	23.1	10	31.3	27.7	5,467	32.9	21.7	32.7
Middle	8	22.9	14.0	1,207	14.9	12.7	4	12.5	13.3	361	2.2	13.5	16.1
Upper	15	42.9	56.1	4,429	54.7	63.8	16	50.0	58.0	10,640	64.1	64.2	48.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	35	100.0	100.0	8,102	100.0	100.0	32	100.0	100.0	16,596	100.0	100.0	100.0

Source: 2024 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Table 15B

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Laredo MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	1.9	0	0.0	1.0	0	0.0	0.0	0	0.0	0.0	2.9
Moderate	0	0.0	9.3	0	0.0	8.6	0	0.0	9.2	0	0.0	6.6	32.7
Middle	0	0.0	9.3	0	0.0	8.5	0	0.0	6.2	0	0.0	3.1	16.1
Upper	0	0.0	79.6	0	0.0	81.9	0	0.0	84.6	0	0.0	90.3	48.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.4	0	0.0	3.6	0	0.0	0.0	0	0.0	0.0	2.9
Moderate	1	50.0	24.4	115	17.7	26.7	0	0.0	17.6	0	0.0	15.4	32.7
Middle	0	0.0	17.1	0	0.0	7.5	0	0.0	16.2	0	0.0	13.8	16.1
Upper	1	50.0	56.1	536	82.3	62.1	0	0.0	66.2	0	0.0	70.8	48.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	651	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	2.9
Moderate	0	0.0	16.9	0	0.0	14.2	0	0.0	15.2	0	0.0	16.9	32.7
Middle	0	0.0	12.3	0	0.0	8.1	0	0.0	21.2	0	0.0	21.9	16.1
Upper	0	0.0	70.8	0	0.0	77.7	0	0.0	63.6	0	0.0	61.2	48.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

TCB's geographic distribution of small business loans reflects good penetration throughout the AA. In 2023 and 2024, the bank's small business lending among LMI census tracts fell slightly below the aggregate lenders and the respective demographic figures. Given that TCB's performance is comparable to aggregate lenders and the percentage of businesses located in LMI tracts, the bank's performance is good.

Table 16

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography Assessment Area: Laredo MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	12	1.6	3.4	573	0.8	2.1	7	1.1	2.9	566	0.8	2.0	4.7
Moderate	155	20.3	21.8	12,995	17.2	15.0	121	18.4	21.8	11,702	17.3	16.1	26.2
Middle	88	11.5	11.6	8,699	11.5	6.2	75	11.4	10.7	7,162	10.6	6.8	14.9
Upper	504	66.1	62.7	53,329	70.5	76.2	452	68.7	64.1	48,047	71.1	74.9	53.8
Unknown	3	0.4	0.2	64	0.1	0.4	3	0.5	0.2	77	0.1	0.1	0.4
Total	762	100.0	100.0	75,660	100.0	100.0	658	100.0	100.0	67,554	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Borrowers of Different Income Levels and Businesses of Different Revenue Sizes

The bank’s distribution of lending to borrowers reflects good penetration among individuals of different income levels and businesses of different revenue sizes. While TCB’s HMDA lending to LMI borrowers is adequate, lending to small businesses is excellent and carried more weight when arriving at the overall conclusions. The distribution of the bank’s lending to middle- and upper-income borrowers did not affect conclusions reached about TCB’s performance to LMI borrowers.

Residential Real Estate (HMDA) Lending

HMDA lending by borrower income in the AA is adequate when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the AA.

In 2023, TCB did not originate any home mortgage loans to low-income borrowers and extended one to a moderate-income borrower, which was below aggregate and the demographic figure. In 2024, TCB originated a home mortgage loan to a low-income borrower and another one to a moderate-income borrower. It is noteworthy that the performance of aggregate lenders was also substantially below the demographic figures for LMI families, which better reflects loan demand and LMI families’ challenges in securing home mortgage loans given scarce affordable housing, higher interest rate environment, and difficulty in meeting financing requirements. When adding the high level of competition among financial institutions and TCB’s strategic focus on small business lending rather than HMDA lending, the bank’s lending is adequate.

Table 17A

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Laredo MSA													
Borrower Income Level	Bank And Aggregate Loans By Year											Families by Family Income %	
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%		\$%
Home Purchase Loans													
Low	0	0.0	0.6	0	0.0	0.3	0	0.0	1.1	0	0.0	0.5	25.8
Moderate	0	0.0	7.8	0	0.0	4.5	0	0.0	8.3	0	0.0	5.6	14.7
Middle	0	0.0	25.5	0	0.0	21.4	1	7.7	25.1	68	0.9	21.7	17.6
Upper	5	38.5	45.0	1,876	51.4	54.0	5	38.5	37.7	2,185	28.8	46.6	41.9
Unknown	8	61.5	21.1	1,776	48.6	19.9	7	53.8	27.8	5,337	70.3	25.6	0.0
Total	13	100.0	100.0	3,652	100.0	100.0	13	100.0	100.0	7,590	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.1	0	0.0	1.2	0	0.0	2.5	0	0.0	1.2	25.8
Moderate	1	9.1	6.1	100	6.0	3.2	0	0.0	11.0	0	0.0	6.1	14.7
Middle	0	0.0	17.2	0	0.0	12.7	0	0.0	19.8	0	0.0	14.9	17.6
Upper	1	9.1	59.8	144	8.6	67.8	4	66.7	41.6	969	73.7	48.5	41.9
Unknown	9	81.8	13.8	1,425	85.4	15.0	2	33.3	24.9	345	26.3	29.3	0.0
Total	11	100.0	100.0	1,669	100.0	100.0	6	100.0	100.0	1,314	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	1	16.7	3.0	22	5.6	0.9	25.8
Moderate	0	0.0	10.6	0	0.0	5.8	1	16.7	13.4	100	25.4	8.2	14.7
Middle	0	0.0	28.8	0	0.0	19.2	0	0.0	25.4	0	0.0	19.2	17.6
Upper	0	0.0	54.5	0	0.0	67.7	3	50.0	53.7	211	53.7	66.0	41.9
Unknown	2	100.0	6.1	60	100.0	7.3	1	16.7	4.5	60	15.3	5.7	0.0
Total	2	100.0	100.0	60	100.0	100.0	6	100.0	100.0	393	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	1.1	0	0.0	0.5	1	4.0	1.4	22	0.2	0.6	25.8
Moderate	1	3.6	7.5	100	1.7	4.4	1	4.0	8.8	100	1.1	5.7	14.7
Middle	0	0.0	24.0	0	0.0	20.3	1	4.0	24.0	68	0.7	20.8	17.6
Upper	8	28.6	46.2	2,671	44.3	54.9	12	48.0	39.2	3,365	36.2	47.2	41.9
Unknown	19	67.9	21.2	3,261	54.1	19.9	10	40.0	26.8	5,742	61.8	25.7	0.0
Total	28	100.0	100.0	6,032	100.0	100.0	25	100.0	100.0	9,297	100.0	100.0	100.0
Source: 2024 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

Table 17B

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Laredo MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Other Purpose LOC													
Low	0	0.0	3.7	0	0.0	3.9	0	0.0	3.1	0	0.0	1.1	25.8
Moderate	0	0.0	11.1	0	0.0	8.8	0	0.0	6.2	0	0.0	3.6	14.7
Middle	0	0.0	18.5	0	0.0	17.0	0	0.0	12.3	0	0.0	10.1	17.6
Upper	0	0.0	64.8	0	0.0	67.1	0	0.0	72.3	0	0.0	76.7	41.9
Unknown	0	0.0	1.9	0	0.0	3.1	0	0.0	6.2	0	0.0	8.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	12.2	0	0.0	7.2	0	0.0	4.4	0	0.0	5.1	25.8
Moderate	0	0.0	4.9	0	0.0	4.1	0	0.0	16.2	0	0.0	13.7	14.7
Middle	0	0.0	9.8	0	0.0	7.8	0	0.0	20.6	0	0.0	19.2	17.6
Upper	2	100.0	65.9	651	100.0	77.6	0	0.0	57.4	0	0.0	60.4	41.9
Unknown	0	0.0	7.3	0	0.0	3.3	0	0.0	1.5	0	0.0	1.6	0.0
Total	2	100.0	100.0	651	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.1	0	0.0	0.7	0	0.0	0.0	0	0.0	0.0	25.8
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	14.7
Middle	0	0.0	1.5	0	0.0	1.9	0	0.0	0.0	0	0.0	0.0	17.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	41.9
Unknown	0	0.0	95.4	0	0.0	97.5	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

TCB's borrower distribution of small business loans by revenue size of businesses is excellent. The bank's distribution of small business loans to businesses with revenues of \$1 million or less significantly outperformed the aggregate lending performance in 2023 and 2024. Neither TCB nor aggregate lenders met the demographic figure (90.3 percent of businesses reported revenues of \$1 million or less), which is reasonable as not every small business would need a loan during the review period. In addition, it reflects well on the bank that it extended approximately 76.0 percent of its small business loans in amounts of \$100,000 or less, as community contacts identified smaller dollar loans as a credit need for AA small and start-up businesses.

Table 18

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Laredo MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	535	70.2	41.0	43,379	57.3	33.0	451	68.5	40.0	37,214	55.1	33.0	90.3
Over \$1 Million	216	28.3		30,992	41.0		195	29.6		28,414	42.1		9.0
Revenue Unknown	11	1.4		1,289	1.7		12	1.8		1,926	2.9		0.7
Total	762	100.0		75,660	100.0		658	100.0		67,554	100.0		100.0
By Loan Size													
\$100,000 or Less	584	76.6	88.4	21,167	28.0	30.2	501	76.1	88.6	18,399	27.2	30.7	
\$100,001 - \$250,000	100	13.1	6.6	16,488	21.8	21.7	89	13.5	6.6	14,971	22.2	21.7	
\$250,001 - \$1 Million	78	10.2	5.0	38,005	50.2	48.0	68	10.3	4.7	34,184	50.6	47.6	
Total	762	100.0	100.0	75,660	100.0	100.0	658	100.0	100.0	67,554	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	443	82.8		13,917	32.1		375	83.1		11,712	31.5		
\$100,001 - \$250,000	50	9.3		8,095	18.7		39	8.6		6,027	16.2		
\$250,001 - \$1 Million	42	7.9		21,367	49.3		37	8.2		19,475	52.3		
Total	535	100.0		43,379	100.0		451	100.0		37,214	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

The bank makes an adequate level of CD loans in the AA. As depicted in Table 19, TCB originated 11 qualified CD loans totaling \$16.3 million in the AA, which represents 64.7 percent and 61.3 percent of its CD loan originations during the review period by number dollar amount, respectively. The number and dollar amount of the bank’s qualified CD loans decreased by 35.5 percent and 83.4 percent, respectively, compared to the previous evaluation. The sharp decline was primarily due to the cessation of the PPP loans in May 2021, as TCB participated extensively in this program.

TCB extended 10 loans to promote affordable housing, which represents 68.8 percent of the total CD loans in the AA. This level of CD lending activity reflects favorably in the bank’s performance, community contacts noted affordable housing was an AA need. Notable examples of TCB’s CD loans in the AA include:

- An \$8.8 million loan to finance the purchase of a housing project that provides rental units to LMI families at an affordable rate.
- A \$1.6 million to expand a hospital that benefits LMI individuals.

Table 19

Community Development Lending Assessment Area: Laredo MSA		
Purpose	#	\$(000)
Affordable Housing	10	14,682
Community Services	0	0
Economic Development	0	0
Revitalization and Stabilization	1	1,640
Totals	11	16,322

Note: Discrepancies in dollar amount totals is possible due to rounding.

INVESTMENT TEST

TCB has an adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors, that rarely positions it as a leader. As previously discussed, a significant majority of the bank’s qualified CD investments made during the review period were issued to CDFIs and SBICs serving more than one of TCB’s delineated AAs. The bank’s strategy for applying CD investment funds focuses on seeking opportunities to invest in organizations and activities that benefit more than one of the delineated AAs. Several of these activities could not be clearly allocated to specific AAs; as a result, the bank’s qualified CD investments are discussed at the institutional level. However, all six identified investments provided a direct benefit to Laredo MSA AA.

TCB made 46 qualified CD donations totaling \$269,000 during the review period, representing a 5.1 percent increase by dollar amount from the previous evaluation. Donations were made to various organizations that provide CD services to the AA, such as essentials to the homeless and victims of domestic abuse, affordable housing to LMI families, and financial literacy training. The bank’s CD donations exhibit an adequate responsiveness to credit and CD needs.

Table 20

Investments, Grants, and Donations Assessment Area: Laredo MSA						
Community Development Purpose	Investments		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	0	0	5	45	5	45
Community Services	0	0	41	224	41	224
Economic Development	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0
Total	0	0	46	269	46	269

Note: Discrepancies in dollar amount totals is possible due to rounding.

SERVICE TEST

The bank’s performance under the service test is good.

Retail Services

TCB’s branch locations, drive-through facilities, and alternative delivery systems, such as online and mobile banking, are reasonably accessible to the bank’s geographies and individuals of different income levels in the AA. Although TCB does not have any branches located within an LMI census tract, two of the bank’s branches are bordered by moderate-income census tracts.

Table 21

Branch and Deposit-Taking ATM Locations Assessment Area: Laredo MSA								
Tract Income	Census Tracts		% of Households	% of Businesses	Branches		Deposit-Taking ATMs	
	#	%			#	%	#	%
Low	3	4.3	3.7	4.7	0	0.0	0	0.0
Moderate	31	44.9	39.3	26.2	0	0.0	0	0.0
Middle	13	18.8	17.2	14.9	1	33.3	3	42.9
Upper	20	29.0	39.8	53.8	2	66.7	4	57.1
Unknown	2	2.9	0.0	0.4	0	0.0	0	0.0
Total	69	100.0	100.0	100.0	3	100.0	7	100.0

The bank did not open or close any branches in the AA; as such, its record with opening and closing branches was not evaluated. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly LMI geographies and/or LMI individuals. All branches in the AA, which includes the bank’s main office, have extended hours. In addition, the main office offers Saturday hours.

Community Development Services

TCB provides a relatively high level of CD services in the Laredo MSA AA. As depicted in Table 22, bank representatives provided 141 CD services, totaling 2,501 hours, to 34 organizations within the AA. TCB significantly increased total CD services and CD hours in the AA by 72.0 percent and 1,969.3 percent since the previous evaluation. Bank employees served 35 organizations focused on extending community services to LMI individuals and fostering economic development. Additionally, TCB employees dedicated over 171 hours to various organizations to provide financial literacy and education to individuals, businesses, and nonprofit organizations. Given that the community contact highlighted financial literacy as an AA need, the focus on extending financial literacy courses to employees earning an average hourly wage of approximately \$11.82 reflects favorably in TCB’s performance.

Table 22

Community Development Services Assessment Area: Laredo MSA		
Purpose	#	Hours
Affordable Housing	0	0
Community Services	134	2,386
Economic Development	7	115
Revitalization and Stabilization	0	0
Total	141	2,501

SAN ANTONIO METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)

DESCRIPTION OF OPERATIONS IN SAN ANTONIO METROPOLITAN ASSESSMENT AREA

- The San Antonio Metropolitan AA is comprised of Bexar and Atascosa counties, which are part of the San Antonio-New Braunfels, TX MSA. There have been no changes to the delineation of the AA since the prior evaluation. Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- The AA consists of 388 census tracts, of which 9.0 percent are designated as low-income, 36.9 percent as moderate-income, 27.6 percent as middle-income, 25.5 percent as upper-income, and 1.0 percent as unknown-income.
- Three of TCB’s 10 branches are located within the AA, representing 30.0 percent. The branches are located in low-, middle- and upper-income census tracts.
- According to the FDIC Market Share Report as of June 30, 2025, TCB had a market share of 0.1 percent, ranking 26th out of 56 FDIC-insured depository institutions operating within the AA. USAA Federal Savings Bank holds the largest market share at 56.2 percent while Citibank, National Association has the second largest market share at 18.9 percent.
- In 2024, the bank ranked 28th among 181 institutions reporting CRA lending activity. Of the total 44,756 loans, TCB originated 102 or 0.2 percent. JPMorgan Chase Bank ranked first, with 11,328 originations or 25.3 percent, and American Express National Bank ranked second, with 11,252 originations or 25.1 percent.
- In 2024, 590 HMDA reporters originated or purchased 49,764 HMDA-reportable loans in the AA. Of the 590 institutions, TCB ranked 140th, with six home mortgage originations, representing 0.01 percent of the total reportable loans in the AA.
- A community contact noted capital for small business owners as an AA credit need due to economic uncertainty related to surrounding federal spending cuts and tariffs. In addition, the community contact noted concerns about financial institutions limiting their lending activities due to tariffs.

Table 23

Population Change			
Assessment Area: San Antonio Metropolitan			
Area	2015 Population	2020 Population	Percent Change
San Antonio Metropolitan	1,872,552	2,058,305	9.9
Atascosa County, TX	47,050	48,981	4.1
Bexar County, TX	1,825,502	2,009,324	10.1
San Antonio-New Braunfels, TX MSA	2,286,702	2,558,143	11.9
Texas	26,538,614	29,145,505	9.8
<i>Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census</i>			

- As reflected in Table 23, the AA experienced population growth of 9.9 percent from 2015 to 2020, which is comparable to the statewide population growth rate of 9.8 percent.
- The rural county of Atascosa is the least populated area within the AA.
- Bexar County represents 97.6 percent of the AA’s population, making it the fourth largest county in Texas and the 16th in the nation.

Table 24

Median Family Income Change			
Assessment Area: San Antonio Metropolitan			
Area	2015 Median Family Income (\$)	2020 Median Family Income (\$)	Percent Change
San Antonio Metropolitan	64,757	69,698	7.6
Atascosa County, TX	62,283	64,807	4.1
Bexar County, TX	64,842	70,280	8.4
San Antonio-New Braunfels, TX MSA	67,989	74,284	9.3
Texas	68,523	76,073	11.0

*Source: 2011 - 2015 U.S. Census Bureau American Community Survey
2016 - 2020 U.S. Census Bureau American Community Survey*

Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- Table 24 shows that the AA's MFI increased at a lower rate than the state of Texas' MFI between 2015 and 2020. While Bexar County's MFI increased at a higher rate, it remains below the state of Texas.
- Of the 433,350 families in the AA, 6.6 percent of families are classified as low-income, 33.4 percent as moderate-income, 29.5 percent as middle-income, and 30.5 percent as upper-income families. In addition, 11.8 percent of the AA families are living below the poverty level, which is slightly higher than the statewide poverty level of 10.9 percent.

Table 25

Housing Cost Burden						
Assessment Area: San Antonio Metropolitan						
Area	Cost Burden – Renters			Cost Burden - Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
San Antonio Metropolitan	79.6	53.3	45.6	58.8	35.7	20.5
Atascosa County, TX	59.9	48.5	24.6	46.6	20.5	15.3
Bexar County, TX	79.7	53.4	45.8	59.3	36.2	20.6
San Antonio-New Braunfels, TX MSA	79.2	53.0	44.7	58.6	34.2	19.9
Texas	79.4	49.8	43.5	59.0	32.7	19.4

Cost burden is housing cost that equals 30 percent or more of household income.

Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

- Per Table 25, the cost burden for AA renters is substantially greater than that of homeowners at all income levels. The cost burden for Atascosa County renters and owners is below than in other areas of the AA and the state of Texas.
- The AA contains 718,284 housing units with a median age of 40 years. Of the total units, 54.2 percent are owner-occupied, 37.7 percent are rental units, and 8.1 percent are vacant. Of the owner-occupied units, 4.8 percent are located in low-, 30.1 percent in moderate-, 31.0 percent in middle-, and 34.1 percent in upper-income census tracts.
- The median housing value in the AA is \$169,708, which is below the statewide median housing value of \$187,200.

Table 26

Unemployment Rates					
Assessment Area: San Antonio Metropolitan					
Area	2020	2021	2022	2023	2024
San Antonio Metropolitan	7.6	5.3	3.7	3.8	3.8
Atascosa County, TX	8.8	6.2	4.2	3.9	4.1
Bexar County, TX	7.6	5.3	3.7	3.8	3.8
San Antonio-New Braunfels, TX MSA	7.3	5.2	3.7	3.7	3.8
Texas	7.7	5.6	3.9	4.0	4.1

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- As highlighted in Table 26, unemployment rates doubled in 2020 due to the COVID-19 pandemic, as businesses laid off employees due to the statewide social distancing orders. Unemployment rates have decreased and stabilized.
- The AA’s unemployment rates have been consistently comparable to the statewide rates.
- Major industries in the AA include healthcare and social assistance, accommodation and food services, and government.
- Joint Base San Antonio, H-E-B, and Methodist Healthcare System are the AA major employers.

The following table details selected characteristics of the AA.

Table 27

2024 San Antonio Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	35	9.0	28,772	6.6	9,445	32.8	103,544	23.9
Moderate	143	36.9	144,950	33.4	26,152	18.0	77,625	17.9
Middle	107	27.6	127,632	29.5	10,776	8.4	85,171	19.7
Upper	99	25.5	131,996	30.5	4,711	3.6	167,010	38.5
Unknown	4	1.0	0	0.0	0	0.0	0	0.0
Total AA	388	100.0	433,350	100.0	51,084	11.8	433,350	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	52,666	18,604	4.8	35.3	28,356	53.8	5,706	10.8
Moderate	256,367	117,168	30.1	45.7	115,456	45.0	23,743	9.3
Middle	205,920	120,617	31.0	58.6	71,639	34.8	13,664	6.6
Upper	203,331	132,945	34.1	65.4	55,574	27.3	14,812	7.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	718,284	389,334	100.0	54.2	271,025	37.7	57,925	8.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	5,127	6.4	4,532	6.1	553	11.3	42	5.5
Moderate	22,727	28.4	20,985	28.2	1,602	32.8	140	18.2
Middle	20,806	26.0	19,468	26.2	1,168	23.9	170	22.1
Upper	31,134	38.9	29,204	39.3	1,517	31.1	413	53.8
Unknown	172	0.2	131	0.2	38	0.8	3	0.4
Total AA	79,966	100.0	74,320	100.0	4,878	100.0	768	100.0
Percentage of Total Businesses:				92.9		6.1		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	12	1.5	12	1.5	0	0.0	0	0.0
Moderate	179	22.5	175	22.4	4	30.8	0	0.0
Middle	188	23.6	186	23.8	2	15.4	0	0.0
Upper	416	52.3	409	52.3	7	53.8	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	795	100.0	782	100.0	13	100.0	0	0.0
Percentage of Total Farms:				98.4		1.6		0.0
Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

TCB’s lending performance in the San Antonio Metropolitan AA is adequate. Lending activity reflects adequate responsiveness to the credit needs of the AA. The geographic distribution of loans reflects adequate penetration throughout the AA. In addition, the distribution of lending reflects good penetration among businesses of different revenue sizes. Additionally, the bank makes a low level of CD loans. In drawing conclusions regarding performance, small business lending carried more weight, as they represent both the bank’s strategic focus and the majority of loans originated in the AA during the review period. TCB originated a small number of HMDA-reportable loans in the AA. As such, meaningful conclusions regarding HMDA lending could not be drawn.

Lending Activity

The bank’s lending activity in the AA reflects adequate responsiveness to the credit needs of the AA, though TCB makes limited use of innovative and/or flexible lending practices.

During the review period, TCB originated 17 HMDA reportable loans and 213 small business loans. The loan products and volume appear to be consistent with the credit needs of the AA. The number of small business and HMDA loans extended by the bank was compared against the number of loans made by aggregate lenders during the review period. Of the 590 financial institutions reporting HMDA lending in 2024, TCB ranked 140th, accounting for 0.01 percent of all HMDA loans originated or purchased in the AA. Additionally, the bank ranked 28th out of 181 institutions reporting CRA small business lending in the AA in 2024, with a market share of 0.2 percent. As previously mentioned, TCB strategically applies its resources to meet the credit needs of small businesses in the AA. While the bank offers HMDA reportable loans, this is not a strategic priority and represents a small percentage of its lending. TCB’s lending performance in the AA is primarily based on the bank’s small business loan activity, which aligns with its strategic focus on commercial lending.

Table 28

Summary of Lending Activity January 1, 2023 through December 31, 2024 Assessment Area: San Antonio Metropolitan				
Loan Type	#	%	\$(000)	%
Home Purchase	14	6.0	4,041	15.6
Refinancing	3	1.3	279	1.1
Home Improvement	0	0.0	0	0.0
Multifamily	0	0.0	0	0.0
Other Purpose	0	0.0	0	0.0
Total HMDA	17	7.3	4,320	16.6
Total Small Business	213	91.4	21,587	83.2
Total Small Farm	3	1.3	51	0.2
TOTAL LOANS	233	100.0	25,958	100.0

Note: Discrepancies are possible in dollar amount totals due to rounding.

Geographic Distribution of Loans

The bank's geographic distribution of loans reflects adequate penetration among geographies of different income levels throughout the AA. Loans were generally made in close proximity to TCB's branches, and there were no conspicuous gaps or anomalies in the lending patterns. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions reached about TCB's performance in LMI geographies.

Residential Real Estate (HMDA) Lending

As noted in Table 29, TCB originated a total of 17 HMDA reportable loans inside the AA in 2023 and 2024. While examiners reviewed the geographic distribution of loans, meaningful conclusions could not be drawn due to limited volume of originations during the review period.

Table 29

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: San Antonio Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	1	12.5	2.0	145	9.0	1.3	2	33.3	1.5	391	16.1	0.9	4.8
Moderate	3	37.5	21.2	428	26.6	15.3	0	0.0	21.4	0	0.0	15.0	30.1
Middle	2	25.0	32.4	335	20.8	27.3	1	16.7	32.8	169	6.9	29.6	31.0
Upper	2	25.0	44.4	700	43.5	56.1	3	50.0	44.3	1,873	77.0	54.5	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	8	100.0	100.0	1,608	100.0	100.0	6	100.0	100.0	2,433	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.6	0	0.0	3.0	0	0.0	3.3	0	0.0	2.4	4.8
Moderate	2	66.7	26.7	130	46.6	21.0	0	0.0	24.0	0	0.0	17.8	30.1
Middle	1	33.3	32.3	149	53.4	27.0	0	0.0	31.4	0	0.0	24.7	31.0
Upper	0	0.0	37.3	0	0.0	49.0	0	0.0	41.3	0	0.0	55.1	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	279	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.2	0	0.0	2.2	0	0.0	2.9	0	0.0	2.1	4.8
Moderate	0	0.0	21.0	0	0.0	17.0	0	0.0	19.7	0	0.0	14.1	30.1
Middle	0	0.0	25.3	0	0.0	20.1	0	0.0	24.6	0	0.0	20.1	31.0
Upper	0	0.0	51.5	0	0.0	60.7	0	0.0	52.7	0	0.0	63.7	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	9.6	0	0.0	11.9	0	0.0	11.4	0	0.0	4.1	10.0
Moderate	0	0.0	47.0	0	0.0	29.4	0	0.0	42.9	0	0.0	31.7	41.0
Middle	0	0.0	22.9	0	0.0	23.3	0	0.0	24.3	0	0.0	37.4	24.0
Upper	0	0.0	20.5	0	0.0	35.5	0	0.0	21.4	0	0.0	26.8	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	1	9.1	2.3	145	7.7	2.2	2	33.3	1.9	391	16.1	1.3	4.8
Moderate	5	45.5	22.0	558	29.6	16.9	0	0.0	21.9	0	0.0	16.3	30.1
Middle	3	27.3	31.9	484	25.6	26.9	1	16.7	32.2	169	6.9	29.4	31.0
Upper	2	18.2	43.7	700	37.1	54.0	3	50.0	44.1	1,873	77.0	53.0	34.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	11	100.0	100.0	1,887	100.0	100.0	6	100.0	100.0	2,433	100.0	100.0	100.0

Source: 2024 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The bank’s geographic distribution of small business loans reflects adequate penetration throughout the AA when compared to demographics and the performance of aggregate lenders. As noted in Table 30, TCB’s small business lending among low-income census tracts in 2023 and 2024 exceeded aggregate data and the percentage of small businesses located in these geographies. Among moderate-income census tracts, the bank’s lending performance in 2023 and 2024 was below aggregate data; however, both aggregate lenders and the bank were below the demographic figure. Notably, TCB has a small presence in a highly competitive landscape, with the top three CRA-reportable lenders, JPMorgan Chase Bank, N.A., American Express, N.A. and Citibank, N.A., accounting for 56.4 percent of the market share.

Table 30

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography Assessment Area: San Antonio Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year											Total Businesses %	
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%		\$%
Low	8	7.1	5.4	1,076	8.7	7.8	9	9.0	5.1	1,368	14.9	7.6	6.4
Moderate	15	13.3	24.6	1,468	11.8	24.8	14	14.0	23.8	1,576	17.1	25.1	28.4
Middle	38	33.6	24.1	2,011	16.2	21.9	33	33.0	23.9	1,930	21.0	22.8	26.0
Upper	52	46.0	45.5	7,838	63.2	45.1	44	44.0	46.7	4,320	47.0	44.1	38.9
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	0	0.0	0.4	0.2
Total	113	100.0	100.0	12,393	100.0	100.0	100	100.0	100.0	9,194	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Lending to Businesses of Different Revenue Sizes

The bank’s distribution of lending reflects good penetration among businesses of different revenue sizes.

Residential Real Estate (HMDA) Lending

As noted in Table 31, TCB originated a total of 17 HMDA reportable loans inside the AA in 2023 and 2024. While examiners reviewed the geographic distribution of loans, meaningful conclusions could not be drawn due to limited volume of originations during the review period.

Table 31

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: San Antonio Metropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	%	%	#	%	#%	\$(000)	%	%	
Home Purchase Loans													
Low	0	0.0	2.1	0	0.0	1.0	0	0.0	2.2	0	0.0	1.2	23.9
Moderate	0	0.0	14.7	0	0.0	10.4	1	16.7	14.6	142	5.8	10.2	17.9
Middle	0	0.0	21.3	0	0.0	18.8	0	0.0	20.5	0	0.0	17.6	19.7
Upper	4	50.0	31.9	798	49.6	40.8	1	16.7	29.6	675	27.7	37.3	38.5
Unknown	4	50.0	30.1	810	50.4	29.0	4	66.7	33.1	1,616	66.4	33.8	0.0
Total	8	100.0	100.0	1,608	100.0	100.0	6	100.0	100.0	2,433	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	7.8	0	0.0	4.0	0	0.0	6.3	0	0.0	2.7	23.9
Moderate	0	0.0	17.8	0	0.0	11.8	0	0.0	13.2	0	0.0	6.8	17.9
Middle	0	0.0	21.8	0	0.0	17.9	0	0.0	16.6	0	0.0	10.7	19.7
Upper	1	33.3	36.0	60	21.5	46.1	0	0.0	32.0	0	0.0	34.1	38.5
Unknown	2	66.7	16.7	219	78.5	20.2	0	0.0	31.9	0	0.0	45.7	0.0
Total	3	100.0	100.0	279	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	9.0	0	0.0	5.4	0	0.0	7.7	0	0.0	4.5	23.9
Moderate	0	0.0	16.0	0	0.0	11.7	0	0.0	15.2	0	0.0	9.2	17.9
Middle	0	0.0	21.2	0	0.0	16.3	0	0.0	17.7	0	0.0	12.3	19.7
Upper	0	0.0	51.5	0	0.0	62.4	0	0.0	54.5	0	0.0	63.5	38.5
Unknown	0	0.0	2.3	0	0.0	4.1	0	0.0	4.9	0	0.0	10.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	3.2	0	0.0	1.3	0	0.0	3.2	0	0.0	1.5	23.9
Moderate	0	0.0	15.1	0	0.0	10.6	1	16.7	14.4	142	5.8	9.7	17.9
Middle	0	0.0	21.3	0	0.0	18.6	0	0.0	19.7	0	0.0	16.6	19.7
Upper	5	45.5	33.2	858	45.5	41.5	1	16.7	31.0	675	27.7	37.3	38.5
Unknown	6	54.5	27.3	1,029	54.5	27.9	4	66.7	31.6	1,616	66.4	34.9	0.0
Total	11	100.0	100.0	1,887	100.0	100.0	6	100.0	100.0	2,433	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Small Business Lending

TCB's borrower distribution of small business lending by revenue size of businesses is good. Per Table 32, the bank originated a higher percentage of loans to businesses with revenues of \$1 million or less than aggregate CRA-reporters in 2023 and 2024, demonstrating a commitment to meet the credit needs of small businesses. While TCB's lending fell below the demographic (92.9 percent of businesses in the AA that reported revenues of \$1 million or less), this is not presumed to be representative of loan demand given that aggregate CRA-reporters also fell significantly below. Additionally, the bank originated 72.6 percent of its loans in amounts of \$100,000 or less, which is particularly noteworthy as a community contact stated the AA small businesses need

smaller dollar lending. This reflects favorably on TCB's responsiveness to the credit needs of small businesses in the AA.

Table 32

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: San Antonio Metropolitan													Total Businesses %
Bank And Aggregate Loans By Year													
2023						2024							
Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg		
#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%		
By Revenue													
\$1 Million or Less	89	78.8	49.9	8,209	66.2	30.0	79	79.0	48.7	5,033	54.7	29.3	92.9
Over \$1 Million	22	19.5		4,100	33.1		19	19.0		4,095	44.5		6.1
Revenue Unknown	2	1.8		84	0.7		2	2.0		66	0.7		1.0
Total	113	100.0		12,393	100.0		100	100.0		9,194	100.0		100.0
By Loan Size													
\$100,000 or Less	82	72.6	93.6	3,089	24.9	36.7	81	81.0	93.2	3,104	33.8	36.7	
\$100,001 - \$250,000	19	16.8	3.3	3,487	28.1	16.0	13	13.0	3.8	2,252	24.5	17.1	
\$250,001 - \$1 Million	12	10.6	3.0	5,817	46.9	47.3	6	6.0	3.1	3,838	41.7	46.2	
Total	113	100.0	100.0	12,393	100.0	100.0	100	100.0	100.0	9,194	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	69	77.5		2,446	29.8		68	86.1		2,308	45.9		
\$100,001 - \$250,000	13	14.6		2,396	29.2		9	11.4		1,537	30.5		
\$250,001 - \$1 Million	7	7.9		3,367	41.0		2	2.5		1,188	23.6		
Total	89	100.0		8,209	100.0		79	100.0		5,033	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

TCB makes a low level of CD loans in the San Antonio Metropolitan AA. During the review period, TCB did not originate any CD loans in the AA. While no CD loans were made in the AA, TCB originated loans that benefitted all the AAs, including the San Antonio Metropolitan AA, which are discussed at the institutional level of this Performance Evaluation. The AA is home to 181 CRA-reporters that compete for CD loans in the AA. While community contacts identified ample opportunity for CD lending, the high level of competition and the bank's limited presence in the AA impact TCB's performance. Moreover, the increase in interest rates has created a lot of uncertainty and resulted in halted or suspended projects, reducing the opportunity for CD lending. To meet the CD needs in this competitive environment, TCB turned to opportunities benefiting the broader-statewide and regional areas that include the San Antonio Metropolitan AA. This approach demonstrates the bank's commitment to CD lending overall. As such, while the bank did not originate CD loans in the AA, this component carries less weight in drawing overall conclusions regarding the bank's performance in meeting credit needs.

INVESTMENT TEST

TCB’s performance under the investment test in the San Antonio Metropolitan AA is adequate. The bank has an adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors and is rarely in a leadership position. TCB’s investments were primarily focused on community services. TCB seeks opportunities to invest in organizations and activities that benefit more than one of its delineated AAs. Several of these activities were unable to be clearly divided between the AAs; as a result, qualified CD investments are discussed at the institutional level.

As shown in Table 33, TCB made 24 CD donations for a total of \$67,450 to organizations that specifically serve the AA. Although the review period was shorter, the bank’s donations increased by dollar amount, 4.7 percent, since the previous evaluation. Examples of notable donations include:

- A \$5,000 donation to a CD corporation with a mission to extend community services, including affordable housing resources and educational needs, to LMI individuals/families.
- A \$5,000 donation to a nonprofit organization that provides a range of community services including, but not limited to credit, homeownership, home maintenance, and financial literacy programs.

Table 33

Investments, Grants, and Donations Assessment Area: San Antonio Metropolitan						
Community Development Purpose	Current Investments		Donations		Total	
	#	\$(000)	#	\$(000)	#	\$(000)
Affordable Housing	0	0	0	0	0	0
Community Services	0	0	24	67	24	67
Economic Development	0	0	0	0	0	0
Revitalization and Stabilization	0	0	0	0	0	0
Total	0	0	24	67	24	67
¹ Book value of investment ² Original market value of investment <i>Note: Discrepancies in dollar amount totals possible due to rounding</i>						

SERVICE TEST

The bank’s service test performance in the San Antonio Metropolitan AA is good.

Retail Services

TCB’s branch locations, drive-through facilities, and alternative delivery systems, such as online and mobile banking, are accessible to the bank’s geographies and individuals of different income levels in its AA. As shown in Table 34, TCB operates three branch offices and three ATMs as of June 30, 2025, were compared to the distribution of the population and businesses among the tract categories within the AA. The table below summarizes the bank’s retail locations in the San Antonio Metropolitan AA.

Table 34

Branch and Deposit-Taking ATM Locations Assessment Area: San Antonio Metropolitan								
Tract Income	Census Tracts		% of Households	% of Businesses	Branches		Deposit-Taking ATMs	
	#	%			#	%	#	%
Low	35	9.0	7.1	6.4	1	33.3	1	33.3
Moderate	143	36.9	35.2	28.4	1	33.3	0	0.0
Middle	107	27.6	29.1	26.0	0	0.0	1	33.3
Upper	99	25.5	28.6	38.9	1	33.3	1	33.3
Unknown	4	1.0	0.0	0.2	0	0.0	0	0.0
Total	388	100.0	100.0	100.0	3	100.0	3	100.0

TCB did not open or close any branches in the AA during the review period; therefore, examiners did not evaluate the bank’s record in opening and closing of branches. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies and/or LMI individuals. One of the three locations offers lobby hours on Saturday, and this location is centrally located in relation to the other branches in the AA.

Community Development Services

The bank provides an adequate level of CD services in the San Antonio Metropolitan AA. TCB’s employees served in various capacities for 11 organizations that offer CD services to LMI individuals. As depicted on Table 35, bank employees provided 57 CD services totaling 128 hours during the review period. The bank’s efforts in providing qualified CD services throughout the AA demonstrate TCB’s commitment to addressing the needs of the community. Examples of CD services performed by bank employees include:

- Facilitation of financial education sessions that provided LMI students with relevant information on budgeting, credit, savings, and financial fraud prevention.
- Partnership with a nonprofit organization whose purpose is to provide affordable housing for LMI families. This partnership provided financial literacy workshops centered around foreclosures and financial counseling.
- Set up of a community room that provides meeting space to local nonprofit organizations, civic groups, and small businesses at no charge. This initiative was created to address CD needs beyond banking.

Table 35

Community Development Services Assessment Area: San Antonio Metropolitan		
Purpose	#	Hours
Affordable Housing	0	0
Community Services	57	128
Economic Development	0	0
Revitalization and Stabilization	0	0
Total	57	128

METROPOLITAN ASSESSMENT AREAS
(Limited-Scope Review)

DESCRIPTION OF OPERATIONS

McAllen Metropolitan Statistical Area Assessment Area

- The AA is comprised of the entirety of Hidalgo County, and no changes have been made since previous examination.
- TCB operates one branch in the AA located in an upper-income census tract, representing 10.0 percent of its branches.
- The AA consists of 212 census tracts, of which 6.1 percent are designated as low-income, 22.2 percent as moderate-income, 37.7 percent as middle-income, 29.7 percent as upper-income, and 4.2 percent as unknown-income.
- As of June 30, 2025, the bank had \$26.5 million in deposits in the AA, representing a market share of 0.2 percent and 1.6 percent of TCB's total deposits.
- According to 2020 ACS data, the total population of the AA was 870,781, representing 3.0 percent of Texas' population.
- In 2024, the bank ranked 39th among the 106 institutions that originated or purchased CRA-reportable loans in the AA. Of the 17,383 reportable loans made in the AA, the bank originated 41 or 0.2 percent.
- In 2024, TCB ranked 78th of the 304 institutions that originated or purchased 9,994 HMDA-reportable loans in the AA. The bank originated one home mortgage loan, representing 0.01 percent of total reportable loans in the AA.
- The AA consists of 195,687 families, of which 5.5 percent are low-income, 19.8 percent are moderate-income, 40.2 percent are middle-income, 32.1 percent are upper-income, and 2.4 percent are unknown-income. Moreover, 25.5 percent of families in the AA live below the poverty level.

Brownsville Metropolitan Statistical Area Assessment Area

- The AA is comprised of the entirety of Cameron County, and no changes were made since the previous examination.
- TCB operates one branch in the AA located in a middle-income census tract, representing 10.0 percent of its branches.
- The AA consists of 122 census tracts, of which 2.5 percent are designated as low-income, 30.3 percent as moderate-income, 36.9 as middle-income, 27.0 as upper income, and 3.3 percent as unknown-income.
- As of June 30, 2025, the bank had \$51.6 million in deposits in the AA, representing a market share of 0.9 percent and 3.0 percent of TCB's total deposits.
- According to 2020 ACS data, the total population of the AA was 421,017, representing 1.4 percent of Texas' population.
- In 2024, the bank ranked 24th among the 90 institutions that originated or purchased CRA-reportable loans in the AA. Of the 7,412 loans made in the AA, the bank originated 48 or 0.6 percent.
- In 2024, TCB ranked 64th out of the 272 institutions that originated or purchased 5,296 HMDA-reportable loans in the AA. The bank originated four home mortgage loans, representing 0.07 percent of total reportable loans in the AA.
- The AA consists of 98,120 families, of which 1.9 percent are low-income, 25.3 percent are moderate-income, 40.0 percent are middle-income, 31.9 percent are upper-income, and

0.8 percent are unknown-income. Moreover, 23.6 percent of families in the AA live below the poverty level.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

TCB's lending and service performance in the AAs is below the bank's overall performance; however, the investment test is consistent. The bank's performance in the AAs receiving a limited-scope review did not impact TCB's overall performance. Table 36 summarizes the conclusions regarding the bank's performance in the metropolitan AAs receiving a limited-scope review. Additional information regarding detailed demographic information and the HMDA- and CRA-reportable lending for the metropolitan limited-scope AAs can be found in Appendix C.

Table 36

Assessment Area	Lending Test	Investment Test	Service Test
McAllen MSA	Below	Consistent	Below
Brownsville MSA	Below	Consistent	Below

NONMETROPOLITAN ASSESSMENT AREA
(Limited-Scope Review)

DESCRIPTION OF OPERATIONS

Val Verde County Nonmetropolitan

- The AA is comprised of the entirety of Val Verde County, and no changes have been made since previous examination.
- TCB operates two branches in the AA, representing 20 percent of its branches.
- The AA consists of 14 census tracts, of which 35.7 percent are moderate-income, 42.9 percent are middle income, 14.3 percent are upper-income, and 7.1 percent are designated as unknown-income.
- The FFIEC designated six of the 14 census tracts in the AA as distressed middle-income tracts suffering from poverty.
- As of June 30, 2025, the bank had \$207.7 million in deposits in this AA, representing a market share of 29.9 percent and 12.2 percent of the bank’s total deposits.
- According to the 2020 ACS data, the total population of the AA was 2,943,162, representing 10.1 percent of Texas’ population.
- In 2024, the bank ranked first among the 52 institutions that originated or purchased CRA-reportable loans in the AA. Of the 827 loans made in AA, TCB originated 201 or 24.3 percent.
- In 2024, TCB ranked 14th out of the 103 institutions that originated or purchased 661 HMDA-reportable loans in the AA. The bank originated nine loans or 1.4 percent of the total reportable loans in the AA.
- The AA consists of 12,174 families, of which 41.2 percent are moderate-income, 43.7 percent are middle-income, and 15.1 percent are upper-income. Moreover, 16.2 percent of families in the AA live below the poverty level.

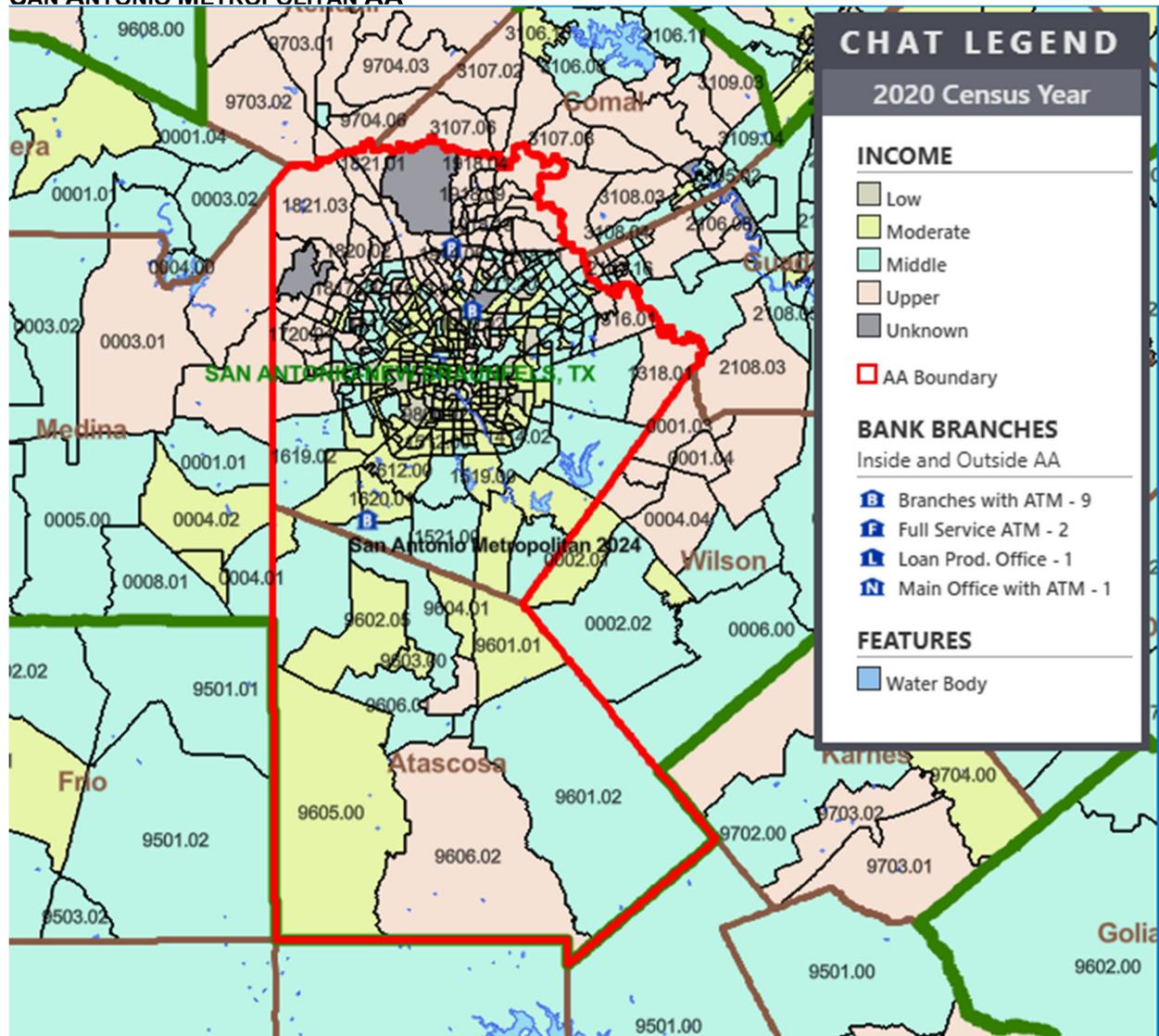
CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

TCB’s lending, investment, and service performance in the Val Verde County Metropolitan is consistent with the overall lending, investment, and service performance. The bank’s performance in the limited-scope AAs did not impact the bank’s overall performance. Table 37 summarizes the conclusions regarding the bank’s performance in the nonmetropolitan AA receiving a limited-scope review. Additional information regarding detailed demographic information and the HMDA and CRA lending for the nonmetropolitan limited-scope AAs can be found in Appendix D.

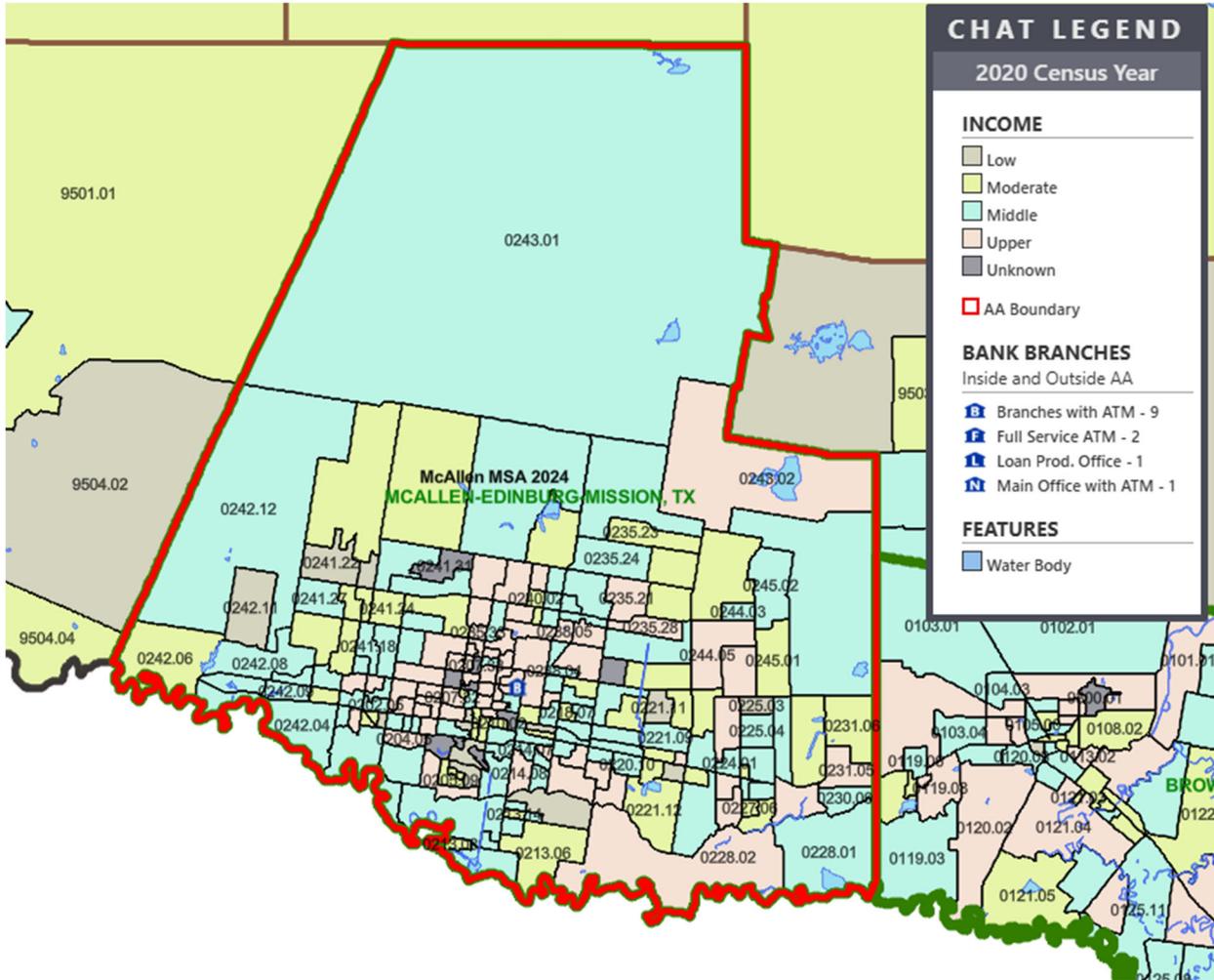
Table 37

Assessment Area	Lending Test	Investment Test	Service Test
Val Verde County Nonmetropolitan	Consistent	Consistent	Consistent

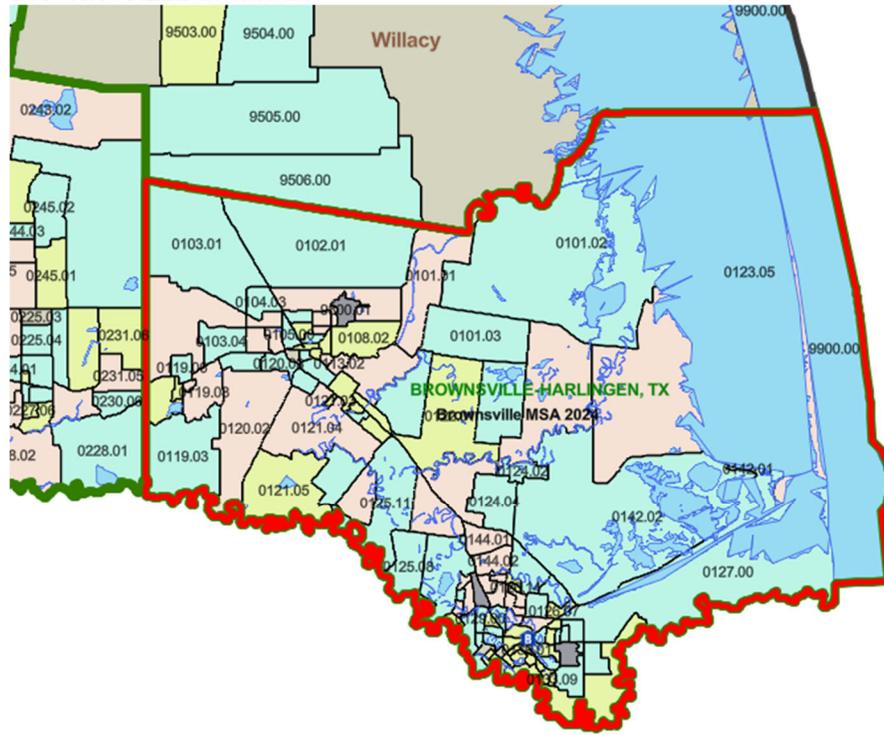
SAN ANTONIO METROPOLITAN AA



McALLEN MSA AA



BROWNSVILLE MSA AA



CHAT LEGEND
2020 Census Year

INCOME

- Low
- Moderate
- Middle
- Upper
- Unknown

AA Boundary

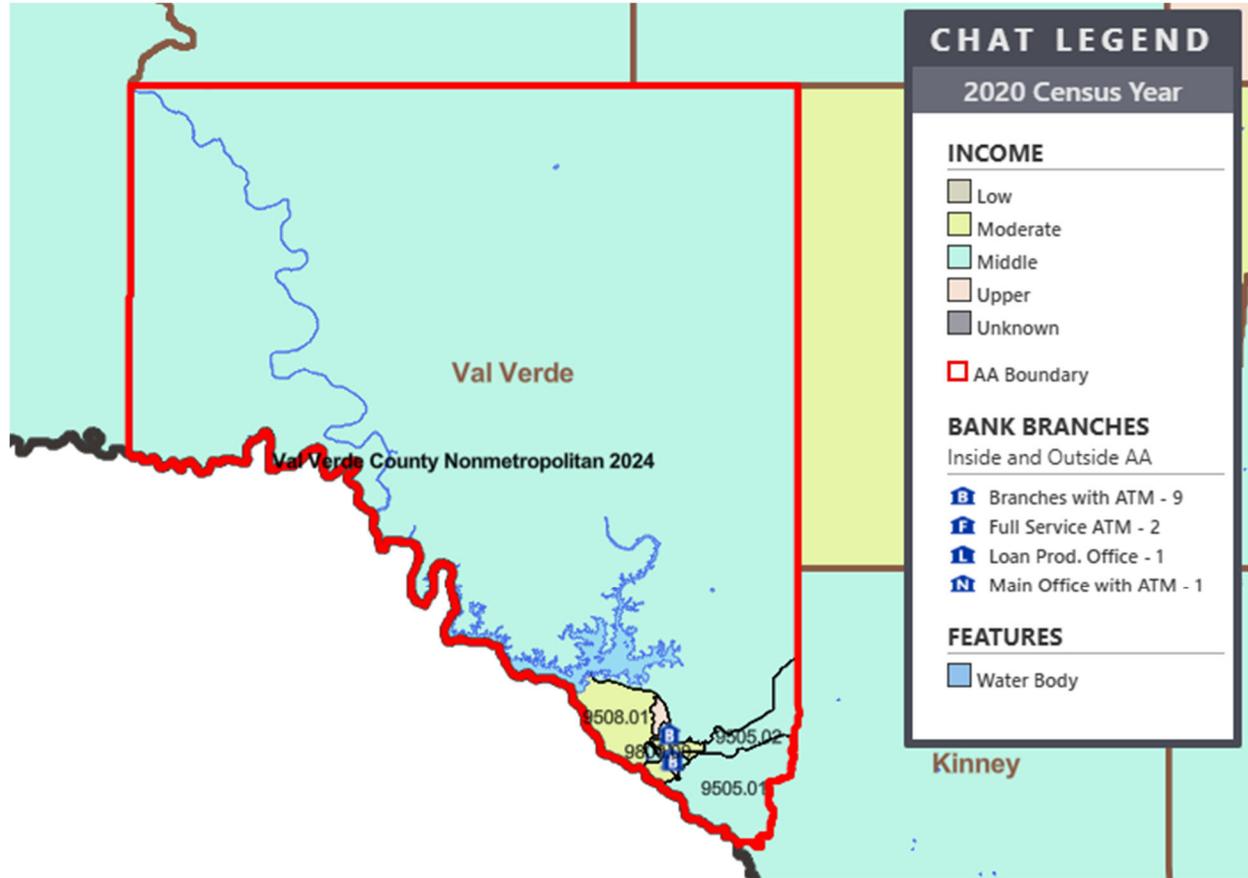
BANK BRANCHES
Inside and Outside AA

- Branches with ATM - 9
- Full Service ATM - 2
- Loan Prod. Office - 1
- Main Office with ATM - 1

FEATURES

- Water Body

VAL VERDE COUNTY NONMETROPOLITAN AA



APPENDIX B – FULL-SCOPE ASSESSMENT AREAS DEMOGRAPHIC INFORMATION

TABLE B-1

2023 Laredo MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	4.3	2,034	3.3	955	47.0	15,840	25.8
Moderate	31	44.9	23,602	38.5	8,064	34.2	9,031	14.7
Middle	13	18.8	10,272	16.7	2,142	20.9	10,767	17.6
Upper	20	29.0	25,415	41.4	2,474	9.7	25,696	41.9
Unknown	2	2.9	11	0.0	0	0.0	0	0.0
Total AA	69	100.0	61,334	100.0	13,635	22.2	61,334	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,444	1,374	2.9	39.9	1,446	42.0	624	18.1
Moderate	33,851	15,736	32.7	46.5	14,312	42.3	3,803	11.2
Middle	14,391	7,727	16.1	53.7	5,400	37.5	1,264	8.8
Upper	32,856	23,256	48.4	70.8	7,120	21.7	2,480	7.5
Unknown	11	0	0.0	0.0	11	100.0	0	0.0
Total AA	84,553	48,093	100.0	56.9	28,289	33.5	8,171	9.7
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	430	4.6	386	4.6	37	4.4	7	10.0
Moderate	2,371	25.3	2,166	25.6	186	22.0	19	27.1
Middle	1,388	14.8	1,284	15.2	96	11.3	8	11.4
Upper	5,141	54.9	4,583	54.3	523	61.8	35	50.0
Unknown	32	0.3	27	0.3	4	0.5	1	1.4
Total AA	9,362	100.0	8,446	100.0	846	100.0	70	100.0
Percentage of Total Businesses:				90.2		9.0		0.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	3	3.4	3	3.5	0	0.0	0	0.0
Moderate	18	20.2	18	20.9	0	0.0	0	0.0
Middle	13	14.6	13	15.1	0	0.0	0	0.0
Upper	55	61.8	52	60.5	3	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	89	100.0	86	100.0	3	100.0	0	0.0
Percentage of Total Farms:				96.6		3.4		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

TABLE B-2

2023 San Antonio Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	35	9.0	28,772	6.6	9,445	32.8	103,544	23.9
Moderate	143	36.9	144,950	33.4	26,152	18.0	77,625	17.9
Middle	107	27.6	127,632	29.5	10,776	8.4	85,171	19.7
Upper	99	25.5	131,996	30.5	4,711	3.6	167,010	38.5
Unknown	4	1.0	0	0.0	0	0.0	0	0.0
Total AA	388	100.0	433,350	100.0	51,084	11.8	433,350	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	52,666	18,604	4.8	35.3	28,356	53.8	5,706	10.8
Moderate	256,367	117,168	30.1	45.7	115,456	45.0	23,743	9.3
Middle	205,920	120,617	31.0	58.6	71,639	34.8	13,664	6.6
Upper	203,331	132,945	34.1	65.4	55,574	27.3	14,812	7.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	718,284	389,334	100.0	54.2	271,025	37.7	57,925	8.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	5,271	6.3	4,662	6.0	567	11.1	42	5.3
Moderate	23,251	27.9	21,446	27.7	1,661	32.6	144	18.2
Middle	21,730	26.1	20,340	26.3	1,222	24.0	168	21.2
Upper	32,920	39.5	30,880	39.9	1,605	31.5	435	54.9
Unknown	179	0.2	133	0.2	42	0.8	4	0.5
Total AA	83,351	100.0	77,461	100.0	5,097	100.0	793	100.0
Percentage of Total Businesses:				92.9		6.1		1.0
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	13	1.6	13	1.6	0	0.0	0	0.0
Moderate	184	22.0	179	21.7	5	35.7	0	0.0
Middle	199	23.7	197	23.9	2	14.3	0	0.0
Upper	442	52.7	435	52.8	7	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	838	100.0	824	100.0	14	100.0	0	0.0
Percentage of Total Farms:				98.3		1.7		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX C – METROPOLITAN LIMITED-SCOPE ASSESSMENT AREAS

TABLE C-1

2023 McAllen MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	13	6.1	10,756	5.5	5,801	53.9	50,999	26.1
Moderate	47	22.2	38,833	19.8	14,091	36.3	29,827	15.2
Middle	80	37.7	78,619	40.2	19,196	24.4	31,732	16.2
Upper	63	29.7	62,820	32.1	9,451	15.0	83,129	42.5
Unknown	9	4.2	4,659	2.4	1,275	27.4	0	0.0
Total AA	212	100.0	195,687	100.0	49,814	25.5	195,687	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied		Rental		Vacant		
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	14,129	8,476	5.1	60.0	4,449	31.5	1,204	8.5
Moderate	56,747	31,448	19.0	55.4	17,783	31.3	7,516	13.2
Middle	115,103	67,372	40.6	58.5	29,733	25.8	17,998	15.6
Upper	89,026	54,784	33.0	61.5	24,009	27.0	10,233	11.5
Unknown	6,375	3,713	2.2	58.2	2,111	33.1	551	8.6
Total AA	281,380	165,793	100.0	58.9	78,085	27.8	37,502	13.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	812	3.2	756	3.1	48	3.4	8	4.3
Moderate	4,075	15.9	3,799	15.8	254	17.8	22	12.0
Middle	9,769	38.0	9,109	37.8	574	40.2	86	46.7
Upper	10,169	39.6	9,602	39.9	505	35.4	62	33.7
Unknown	872	3.4	819	3.4	47	3.3	6	3.3
Total AA	25,697	100.0	24,085	100.0	1,428	100.0	184	100.0
Percentage of Total Businesses:				93.7		5.6		0.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	5	1.5	5	1.6	0	0.0	0	0.0
Moderate	60	18.1	51	16.6	9	37.5	0	0.0
Middle	131	39.6	122	39.7	9	37.5	0	0.0
Upper	130	39.3	124	40.4	6	25.0	0	0.0
Unknown	5	1.5	5	1.6	0	0.0	0	0.0
Total AA	331	100.0	307	100.0	24	100.0	0	0.0
Percentage of Total Farms:				92.7		7.3		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

TABLE C-2

2024 McAllen MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	13	6.1	10,756	5.5	5,801	53.9	50,999	26.1
Moderate	47	22.2	38,833	19.8	14,091	36.3	29,827	15.2
Middle	80	37.7	78,619	40.2	19,196	24.4	31,732	16.2
Upper	63	29.7	62,820	32.1	9,451	15.0	83,129	42.5
Unknown	9	4.2	4,659	2.4	1,275	27.4	0	0.0
Total AA	212	100.0	195,687	100.0	49,814	25.5	195,687	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	14,129	8,476	5.1	60.0	4,449	31.5	1,204	8.5
Moderate	56,747	31,448	19.0	55.4	17,783	31.3	7,516	13.2
Middle	115,103	67,372	40.6	58.5	29,733	25.8	17,998	15.6
Upper	89,026	54,784	33.0	61.5	24,009	27.0	10,233	11.5
Unknown	6,375	3,713	2.2	58.2	2,111	33.1	551	8.6
Total AA	281,380	165,793	100.0	58.9	78,085	27.8	37,502	13.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	580	2.7	545	2.7	27	2.3	8	5.1
Moderate	3,589	16.9	3,354	16.9	212	18.3	23	14.6
Middle	8,543	40.3	7,975	40.1	491	42.5	77	48.7
Upper	7,887	37.2	7,454	37.5	388	33.6	45	28.5
Unknown	611	2.9	568	2.9	38	3.3	5	3.2
Total AA	21,210	100.0	19,896	100.0	1,156	100.0	158	100.0
Percentage of Total Businesses:				93.8		5.5		0.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	3	1.1	3	1.2	0	0.0	0	0.0
Moderate	54	19.5	46	17.8	8	44.4	0	0.0
Middle	109	39.4	102	39.4	7	38.9	0	0.0
Upper	106	38.3	103	39.8	3	16.7	0	0.0
Unknown	5	1.8	5	1.9	0	0.0	0	0.0
Total AA	277	100.0	259	100.0	18	100.0	0	0.0
Percentage of Total Farms:				93.5		6.5		0.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-3A

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													Owner Occupied Units %
Assessment Area: McAllen MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	1.6	0	0.0	1.3	0	0.0	1.5	0	0.0	1.1	5.1
Moderate	0	0.0	12.3	0	0.0	11.0	0	0.0	10.3	0	0.0	9.1	19.0
Middle	1	100.0	39.7	250	100.0	35.7	1	100.0	42.8	148	100.0	38.6	40.6
Upper	0	0.0	43.2	0	0.0	48.3	0	0.0	41.2	0	0.0	45.7	33.0
Unknown	0	0.0	3.1	0	0.0	3.7	0	0.0	4.2	0	0.0	5.5	2.2
Total	1	100.0	100.0	250	100.0	100.0	1	100.0	100.0	148	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.2	0	0.0	1.8	0	0.0	2.1	0	0.0	1.8	5.1
Moderate	0	0.0	13.0	0	0.0	11.8	0	0.0	11.7	0	0.0	11.5	19.0
Middle	0	0.0	38.2	0	0.0	35.8	0	0.0	39.6	0	0.0	36.7	40.6
Upper	0	0.0	43.8	0	0.0	47.3	0	0.0	43.9	0	0.0	46.5	33.0
Unknown	0	0.0	2.9	0	0.0	3.3	0	0.0	2.8	0	0.0	3.5	2.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.1	0	0.0	4.0	0	0.0	3.5	0	0.0	3.9	5.1
Moderate	0	0.0	11.9	0	0.0	12.2	0	0.0	12.6	0	0.0	12.5	19.0
Middle	0	0.0	28.4	0	0.0	31.0	0	0.0	30.7	0	0.0	31.6	40.6
Upper	0	0.0	51.1	0	0.0	50.2	0	0.0	48.7	0	0.0	46.9	33.0
Unknown	0	0.0	3.4	0	0.0	2.5	0	0.0	4.5	0	0.0	5.0	2.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	6.7	0	0.0	4.6	0	0.0	3.4	0	0.0	0.6	
Moderate	0	0.0	17.8	0	0.0	17.5	0	0.0	14.8	0	0.0	5.2	23.4
Middle	0	0.0	24.4	0	0.0	23.3	0	0.0	33.0	0	0.0	28.7	31.3
Upper	2	100.0	51.1	2,121	100.0	54.6	0	0.0	45.5	0	0.0	44.8	36.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	3.4	0	0.0	20.6	3.5
Total	2	100.0	100.0	2,121	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	0	0.0	1.8	0	0.0	1.7	0	0.0	1.8	0	0.0	1.3	
Moderate	0	0.0	12.4	0	0.0	11.7	0	0.0	10.7	0	0.0	9.3	19.0
Middle	1	33.3	38.7	250	10.5	34.4	1	100.0	41.4	148	100.0	37.4	40.6
Upper	2	66.7	44.1	2,121	89.5	48.9	0	0.0	42.3	0	0.0	45.8	33.0
Unknown	0	0.0	3.0	0	0.0	3.3	0	0.0	3.9	0	0.0	6.2	2.2
Total	3	100.0	100.0	2,371	100.0	100.0	1	100.0	100.0	148	100.0	100.0	100.0

Source: 2024 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-3B

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: McAllen MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	0.8	0	0.0	0.7	0	0.0	2.4	0	0.0	2.7	5.1
Moderate	0	0.0	8.8	0	0.0	8.3	0	0.0	8.0	0	0.0	7.6	19.0
Middle	0	0.0	26.4	0	0.0	23.3	0	0.0	32.0	0	0.0	36.2	40.6
Upper	0	0.0	63.2	0	0.0	67.6	0	0.0	56.0	0	0.0	52.7	33.0
Unknown	0	0.0	0.8	0	0.0	0.2	0	0.0	1.6	0	0.0	0.8	2.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.0	0	0.0	0.9	0	0.0	2.8	0	0.0	3.0	5.1
Moderate	0	0.0	13.5	0	0.0	13.9	0	0.0	12.9	0	0.0	11.5	19.0
Middle	0	0.0	33.3	0	0.0	28.8	0	0.0	35.4	0	0.0	36.7	40.6
Upper	0	0.0	49.5	0	0.0	53.0	0	0.0	45.2	0	0.0	46.4	33.0
Unknown	0	0.0	2.6	0	0.0	3.4	0	0.0	3.6	0	0.0	2.4	2.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.2	0	0.0	2.4	0	0.0	3.9	0	0.0	2.2	5.1
Moderate	0	0.0	5.3	0	0.0	3.6	0	0.0	13.7	0	0.0	20.5	19.0
Middle	0	0.0	36.8	0	0.0	37.7	0	0.0	33.3	0	0.0	34.1	40.6
Upper	0	0.0	51.6	0	0.0	53.5	0	0.0	47.1	0	0.0	40.7	33.0
Unknown	0	0.0	3.2	0	0.0	2.8	0	0.0	2.0	0	0.0	2.6	2.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2024 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

TABLE C-4A

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: McAllen MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Home Purchase Loans													
Low	0	0.0	0.3	0	0.0	0.1	0	0.0	0.6	0	0.0	0.4	26.1
Moderate	0	0.0	3.7	0	0.0	1.9	0	0.0	3.4	0	0.0	1.8	15.2
Middle	0	0.0	14.2	0	0.0	10.2	0	0.0	13.6	0	0.0	9.8	16.2
Upper	1	100.0	51.8	250	100.0	59.0	0	0.0	51.7	0	0.0	58.6	42.5
Unknown	0	0.0	29.9	0	0.0	28.7	1	100.0	30.7	148	100.0	29.5	0.0
Total	1	100.0	100.0	250	100.0	100.0	1	100.0	100.0	148	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.1	0	0.0	0.4	0	0.0	1.9	0	0.0	1.0	26.1
Moderate	0	0.0	5.0	0	0.0	2.2	0	0.0	3.7	0	0.0	1.6	15.2
Middle	0	0.0	10.9	0	0.0	6.7	0	0.0	10.8	0	0.0	6.6	16.2
Upper	0	0.0	59.9	0	0.0	63.6	0	0.0	50.6	0	0.0	51.8	42.5
Unknown	0	0.0	23.1	0	0.0	27.0	0	0.0	33.1	0	0.0	39.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.8	0	0.0	3.4	0	0.0	3.5	0	0.0	1.4	26.1
Moderate	0	0.0	13.6	0	0.0	8.8	0	0.0	9.5	0	0.0	6.1	15.2
Middle	0	0.0	14.8	0	0.0	12.9	0	0.0	13.6	0	0.0	11.9	16.2
Upper	0	0.0	60.2	0	0.0	66.3	0	0.0	67.8	0	0.0	70.9	42.5
Unknown	0	0.0	4.5	0	0.0	8.6	0	0.0	5.5	0	0.0	9.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	0.6	0	0.0	0.2	0	0.0	1.0	0	0.0	0.5	26.1
Moderate	0	0.0	4.5	0	0.0	2.2	0	0.0	3.9	0	0.0	1.9	15.2
Middle	0	0.0	13.7	0	0.0	9.7	0	0.0	13.1	0	0.0	9.3	16.2
Upper	1	100.0	53.5	250	100.0	60.0	0	0.0	52.4	0	0.0	57.7	42.5
Unknown	0	0.0	27.6	0	0.0	27.9	1	100.0	29.5	148	100.0	30.6	0.0
Total	1	100.0	100.0	250	100.0	100.0	1	100.0	100.0	148	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

TABLE C-4B

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: McAllen MSA													
Borrower Income Level	Bank And Aggregate Loans By Year											Families by Family Income %	
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%		%
Other Purpose LOC													
Low	0	0.0	0.8	0	0.0	1.0	0	0.0	2.4	0	0.0	1.2	26.1
Moderate	0	0.0	9.6	0	0.0	8.4	0	0.0	6.4	0	0.0	4.2	15.2
Middle	0	0.0	14.4	0	0.0	9.8	0	0.0	11.2	0	0.0	9.4	16.2
Upper	0	0.0	73.6	0	0.0	79.5	0	0.0	76.8	0	0.0	83.3	42.5
Unknown	0	0.0	1.6	0	0.0	1.3	0	0.0	3.2	0	0.0	1.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.3	0	0.0	0.8	0	0.0	3.4	0	0.0	1.8	26.1
Moderate	0	0.0	12.2	0	0.0	8.9	0	0.0	11.4	0	0.0	7.6	15.2
Middle	0	0.0	19.8	0	0.0	14.6	0	0.0	16.8	0	0.0	14.9	16.2
Upper	0	0.0	63.0	0	0.0	70.7	0	0.0	65.4	0	0.0	73.2	42.5
Unknown	0	0.0	2.6	0	0.0	4.9	0	0.0	3.1	0	0.0	2.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	26.1
Moderate	0	0.0	4.2	0	0.0	2.9	0	0.0	0.0	0	0.0	0.0	15.2
Middle	0	0.0	3.2	0	0.0	3.8	0	0.0	0.0	0	0.0	0.0	16.2
Upper	0	0.0	1.1	0	0.0	3.3	0	0.0	2.0	0	0.0	1.4	42.5
Unknown	0	0.0	91.6	0	0.0	90.0	0	0.0	98.0	0	0.0	98.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2024 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

TABLE C-5

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography													
Assessment Area: McAllen MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	0	0.0	2.9	0	0.0	2.8	0	0.0	2.9	0	0.0	2.8	2.7
Moderate	10	30.3	15.2	2,302	40.3	15.0	11	26.8	14.1	886	17.8	14.3	16.9
Middle	6	18.2	36.2	604	10.6	39.3	7	17.1	34.9	1,238	24.8	37.8	40.3
Upper	17	51.5	41.4	2,810	49.2	38.7	21	51.2	43.7	2,710	54.4	40.9	37.2
Unknown	0	0.0	3.7	0	0.0	4.1	2	4.9	4.0	150	3.0	4.1	2.9
Total	33	100.0	100.0	5,716	100.0	100.0	41	100.0	100.0	4,984	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-6

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses													
Assessment Area: McAllen MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	19	57.6	48.5	2,700	47.2	33.0	25	61.0	46.5	2,690	54.0	34.3	93.8
Over \$1 Million	13	39.4		2,566	44.9		16	39.0		2,294	46.0		5.5
Revenue Unknown	1	3.0		450	7.9		0	0.0		0	0.0		0.7
Total	33	100.0		5,716	100.0		41	100.0		4,984	100.0		100.0
By Loan Size													
\$100,000 or Less	21	63.6	92.5	835	14.6	35.8	31	75.6	93.2	1,451	29.1	39.8	
\$100,001 - \$250,000	3	9.1	4.2	407	7.1	18.4	5	12.2	3.9	931	18.7	18.3	
\$250,001 - \$1 Million	9	27.3	3.3	4,474	78.3	45.7	5	12.2	2.9	2,602	52.2	41.9	
Total	33	100.0	100.0	5,716	100.0	100.0	41	100.0	100.0	4,984	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	14	73.7		510	18.9		21	84.0		848	31.5		
\$100,001 - \$250,000	1	5.3		121	4.5		1	4.0		140	5.2		
\$250,001 - \$1 Million	4	21.1		2,069	76.6		3	12.0		1,702	63.3		
Total	19	100.0		2,700	100.0		25	100.0		2,690	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-7

2023 Brownsville MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	2.5	1,911	1.9	956	50.0	23,835	24.3
Moderate	37	30.3	24,842	25.3	8,677	34.9	16,770	17.1
Middle	45	36.9	39,280	40.0	9,109	23.2	16,686	17.0
Upper	33	27.0	31,314	31.9	4,050	12.9	40,829	41.6
Unknown	4	3.3	773	0.8	352	45.5	0	0.0
Total AA	122	100.0	98,120	100.0	23,144	23.6	98,120	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,035	1,025	1.2	33.8	1,600	52.7	410	13.5
Moderate	36,867	17,071	20.3	46.3	15,159	41.1	4,637	12.6
Middle	59,284	34,861	41.5	58.8	16,248	27.4	8,175	13.8
Upper	52,390	30,542	36.3	58.3	9,568	18.3	12,280	23.4
Unknown	968	555	0.7	57.3	339	35.0	74	7.6
Total AA	152,544	84,054	100.0	55.1	42,914	28.1	25,576	16.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	347	3.0	332	3.0	13	1.8	2	1.8
Moderate	3,366	28.7	3,097	28.4	245	33.7	24	21.1
Middle	4,066	34.6	3,769	34.6	257	35.3	40	35.1
Upper	3,844	32.7	3,591	32.9	206	28.3	47	41.2
Unknown	124	1.1	116	1.1	7	1.0	1	0.9
Total AA	11,747	100.0	10,905	100.0	728	100.0	114	100.0
Percentage of Total Businesses:				92.8	6.2		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2	1.1	2	1.1	0	0.0	0	0.0
Moderate	23	12.5	21	11.9	1	16.7	1	100.0
Middle	73	39.7	72	40.7	1	16.7	0	0.0
Upper	84	45.7	80	45.2	4	66.7	0	0.0
Unknown	2	1.1	2	1.1	0	0.0	0	0.0
Total AA	184	100.0	177	100.0	6	100.0	1	100.0
Percentage of Total Farms:				96.2	3.3		0.5	
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

TABLE C-8

2024 Brownsville MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	2.5	1,911	1.9	956	50.0	23,835	24.3
Moderate	37	30.3	24,842	25.3	8,677	34.9	16,770	17.1
Middle	45	36.9	39,280	40.0	9,109	23.2	16,686	17.0
Upper	33	27.0	31,314	31.9	4,050	12.9	40,829	41.6
Unknown	4	3.3	773	0.8	352	45.5	0	0.0
Total AA	122	100.0	98,120	100.0	23,144	23.6	98,120	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,035	1,025	1.2	33.8	1,600	52.7	410	13.5
Moderate	36,867	17,071	20.3	46.3	15,159	41.1	4,637	12.6
Middle	59,284	34,861	41.5	58.8	16,248	27.4	8,175	13.8
Upper	52,390	30,542	36.3	58.3	9,568	18.3	12,280	23.4
Unknown	968	555	0.7	57.3	339	35.0	74	7.6
Total AA	152,544	84,054	100.0	55.1	42,914	28.1	25,576	16.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	356	3.2	342	3.3	11	1.6	3	2.8
Moderate	3,215	29.0	2,961	28.8	231	33.3	23	21.5
Middle	3,890	35.1	3,609	35.1	244	35.2	37	34.6
Upper	3,523	31.8	3,280	31.9	200	28.8	43	40.2
Unknown	110	1.0	101	1.0	8	1.2	1	0.9
Total AA	11,094	100.0	10,293	100.0	694	100.0	107	100.0
Percentage of Total Businesses:				92.8		6.3		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	2	1.1	2	1.2	0	0.0	0	0.0
Moderate	22	12.6	20	11.9	1	16.7	1	100.0
Middle	68	38.9	67	39.9	1	16.7	0	0.0
Upper	82	46.9	78	46.4	4	66.7	0	0.0
Unknown	1	0.6	1	0.6	0	0.0	0	0.0
Total AA	175	100.0	168	100.0	6	100.0	1	100.0
Percentage of Total Farms:				96.0		3.4		0.6
Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

TABLE C-9A

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Brownsville MSA													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%		\$%
Home Purchase Loans													
Low	0	0.0	0.3	0	0.0	0.3	0	0.0	0.5	0	0.0	0.4	1.2
Moderate	0	0.0	14.3	0	0.0	10.5	2	50.0	17.2	226	35.0	13.5	20.3
Middle	0	0.0	39.6	0	0.0	37.8	1	25.0	39.5	140	21.7	38.2	41.5
Upper	1	100.0	45.3	264	100.0	51.2	1	25.0	42.5	279	43.3	47.7	36.3
Unknown	0	0.0	0.5	0	0.0	0.3	0	0.0	0.3	0	0.0	0.2	0.7
Total	1	100.0	100.0	264	100.0	100.0	4	100.0	100.0	645	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.7	0	0.0	0.3	0	0.0	0.1	0	0.0	0.1	1.2
Moderate	0	0.0	10.9	0	0.0	18.9	0	0.0	13.5	0	0.0	10.2	20.3
Middle	0	0.0	44.5	0	0.0	40.6	0	0.0	36.7	0	0.0	35.3	41.5
Upper	2	100.0	43.4	785	100.0	39.9	0	0.0	49.2	0	0.0	54.0	36.3
Unknown	0	0.0	0.5	0	0.0	0.3	0	0.0	0.5	0	0.0	0.4	0.7
Total	2	100.0	100.0	785	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	4.0	0	0.0	2.1	1.2
Moderate	0	0.0	9.5	0	0.0	8.6	0	0.0	16.2	0	0.0	14.7	20.3
Middle	0	0.0	44.0	0	0.0	39.1	0	0.0	38.4	0	0.0	31.5	41.5
Upper	0	0.0	46.4	0	0.0	52.2	0	0.0	40.4	0	0.0	51.0	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.0	0	0.0	0.6	0.7
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans												Multi-family Units %	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	2.6	0	0.0	0.4	2.0
Moderate	0	0.0	32.7	0	0.0	41.0	0	0.0	31.6	0	0.0	29.9	30.1
Middle	0	0.0	44.9	0	0.0	38.2	0	0.0	39.5	0	0.0	32.1	24.6
Upper	0	0.0	20.4	0	0.0	20.2	0	0.0	23.7	0	0.0	34.3	42.8
Unknown	0	0.0	2.0	0	0.0	0.6	0	0.0	2.6	0	0.0	3.4	0.6
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans												Owner Occupied Units %	
Low	0	0.0	0.4	0	0.0	0.3	0	0.0	0.5	0	0.0	0.3	1.2
Moderate	0	0.0	13.9	0	0.0	14.1	2	50.0	16.4	226	35.0	14.3	20.3
Middle	2	40.0	40.2	560	34.8	38.2	1	25.0	38.7	140	21.7	37.1	41.5
Upper	3	60.0	45.0	1,049	65.2	47.1	1	25.0	43.9	279	43.3	47.7	36.3
Unknown	0	0.0	0.5	0	0.0	0.3	0	0.0	0.5	0	0.0	0.5	0.7
Total	5	100.0	100.0	1,609	100.0	100.0	4	100.0	100.0	645	100.0	100.0	100.0

Source: 2024 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-9B

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Brownsville MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.2
Moderate	0	0.0	2.7	0	0.0	2.9	0	0.0	9.6	0	0.0	9.3	20.3
Middle	0	0.0	31.5	0	0.0	31.2	0	0.0	33.7	0	0.0	33.3	41.5
Upper	0	0.0	65.8	0	0.0	65.9	0	0.0	56.6	0	0.0	57.4	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.7
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.7	0	0.0	0.5	0	0.0	0.9	0	0.0	0.6	1.2
Moderate	0	0.0	15.6	0	0.0	11.2	0	0.0	15.2	0	0.0	15.5	20.3
Middle	2	100.0	37.4	560	100.0	38.8	0	0.0	34.8	0	0.0	33.8	41.5
Upper	0	0.0	46.3	0	0.0	49.5	0	0.0	47.4	0	0.0	48.1	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.7	0	0.0	2.0	0.7
Total	2	100.0	100.0	560	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.2	0	0.0	0.6	0	0.0	0.0	0	0.0	0.0	1.2
Moderate	0	0.0	23.5	0	0.0	15.1	0	0.0	12.0	0	0.0	10.4	20.3
Middle	0	0.0	37.0	0	0.0	43.0	0	0.0	40.0	0	0.0	39.8	41.5
Upper	0	0.0	37.0	0	0.0	40.4	0	0.0	44.0	0	0.0	47.2	36.3
Unknown	0	0.0	1.2	0	0.0	1.0	0	0.0	4.0	0	0.0	2.6	0.7
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-10A

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Brownsville MSA													
Borrower Income Level	Bank And Aggregate Loans By Year											Families by Family Income %	
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%		\$%
Home Purchase Loans													
Low	0	0.0	0.8	0	0.0	0.3	0	0.0	0.4	0	0.0	0.2	24.3
Moderate	0	0.0	7.0	0	0.0	3.2	0	0.0	5.9	0	0.0	2.8	17.1
Middle	0	0.0	17.4	0	0.0	13.1	0	0.0	15.3	0	0.0	11.8	17.0
Upper	0	0.0	44.4	0	0.0	52.6	2	50.0	47.8	419	65.0	55.7	41.6
Unknown	1	100.0	30.4	264	100.0	30.7	2	50.0	30.6	226	35.0	29.5	0.0
Total	1	100.0	100.0	264	100.0	100.0	4	100.0	100.0	645	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.3	0	0.0	1.0	0	0.0	2.2	0	0.0	1.0	24.3
Moderate	0	0.0	9.1	0	0.0	3.9	0	0.0	5.8	0	0.0	3.2	17.1
Middle	0	0.0	17.0	0	0.0	9.1	0	0.0	15.0	0	0.0	9.4	17.0
Upper	0	0.0	49.6	0	0.0	47.4	0	0.0	46.1	0	0.0	46.2	41.6
Unknown	2	100.0	21.0	785	100.0	38.6	0	0.0	30.9	0	0.0	40.2	0.0
Total	2	100.0	100.0	785	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	3.6	0	0.0	1.4	0	0.0	6.1	0	0.0	3.4	24.3
Moderate	0	0.0	11.9	0	0.0	6.8	0	0.0	12.1	0	0.0	8.5	17.1
Middle	0	0.0	17.9	0	0.0	17.2	0	0.0	14.1	0	0.0	12.9	17.0
Upper	0	0.0	60.7	0	0.0	64.7	0	0.0	59.6	0	0.0	59.9	41.6
Unknown	0	0.0	6.0	0	0.0	9.9	0	0.0	8.1	0	0.0	15.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	1.5	0	0.0	0.5	0	0.0	1.0	0	0.0	0.4	24.3
Moderate	0	0.0	7.7	0	0.0	3.6	0	0.0	6.3	0	0.0	3.1	17.1
Middle	0	0.0	17.3	0	0.0	12.5	0	0.0	15.5	0	0.0	11.5	17.0
Upper	2	40.0	45.3	560	34.8	51.9	2	50.0	48.3	419	65.0	54.3	41.6
Unknown	3	60.0	28.2	1,049	65.2	31.6	2	50.0	28.9	226	35.0	30.7	0.0
Total	5	100.0	100.0	1,609	100.0	100.0	4	100.0	100.0	645	100.0	100.0	100.0
Source: 2024 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

TABLE C-10B

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Brownsville MSA													
Borrower Income Level	Bank And Aggregate Loans By Year											Families by Family Income %	
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
Other Purpose LOC													
Low	0	0.0	2.7	0	0.0	4.7	0	0.0	3.6	0	0.0	2.8	24.3
Moderate	0	0.0	13.7	0	0.0	11.8	0	0.0	7.2	0	0.0	5.6	17.1
Middle	0	0.0	26.0	0	0.0	20.3	0	0.0	20.5	0	0.0	15.6	17.0
Upper	0	0.0	57.5	0	0.0	63.2	0	0.0	63.9	0	0.0	71.7	41.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	4.8	0	0.0	4.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	2.7	0	0.0	1.6	0	0.0	2.6	0	0.0	1.5	24.3
Moderate	0	0.0	14.3	0	0.0	11.8	0	0.0	11.7	0	0.0	11.5	17.1
Middle	0	0.0	22.4	0	0.0	17.2	0	0.0	21.3	0	0.0	17.1	17.0
Upper	2	100.0	57.1	560	100.0	64.4	0	0.0	60.9	0	0.0	65.7	41.6
Unknown	0	0.0	3.4	0	0.0	5.0	0	0.0	3.5	0	0.0	4.3	0.0
Total	2	100.0	100.0	560	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	9.9	0	0.0	3.4	0	0.0	0.0	0	0.0	0.0	24.3
Moderate	0	0.0	4.9	0	0.0	6.8	0	0.0	0.0	0	0.0	0.0	17.1
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.0
Upper	0	0.0	1.2	0	0.0	4.1	0	0.0	0.0	0	0.0	0.0	41.6
Unknown	0	0.0	84.0	0	0.0	85.6	0	0.0	100.0	0	0.0	100.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-11

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography													
Assessment Area: Brownsville MSA													
Geographic Income Level	Bank And Aggregate Loans By Year											Total Businesses %	
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%		%
Low	0	0.0	1.7	0	0.0	2.1	1	2.1	2.0	33	0.7	2.0	3.2
Moderate	8	18.6	25.5	867	17.2	25.5	7	14.9	24.0	756	16.1	26.7	29.0
Middle	8	18.6	36.0	1,188	23.5	36.1	9	19.1	33.9	545	11.6	31.6	35.1
Upper	27	62.8	35.3	2,997	59.3	35.1	30	63.8	38.5	3,359	71.6	38.9	31.8
Unknown	0	0.0	0.9	0	0.0	1.2	0	0.0	1.1	0	0.0	0.7	1.0
Total	43	100.0	100.0	5,052	100.0	100.0	47	100.0	100.0	4,693	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE C-12

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Brownsville MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	%	%	#	%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	39	90.7	54.3	4,429	87.7	39.7	43	91.5	51.5	4,066	86.6	40.4	92.8
Over \$1 Million	4	9.3		623	12.3		4	8.5		627	13.4		6.3
Revenue Unknown	0	0.0		0	0.0		0	0.0		0	0.0		1.0
Total	43	100.0		5,052	100.0		47	100.0		4,693	100.0		100.0
By Loan Size													
\$100,000 or Less	32	74.4	92.8	1,689	33.4	38.3	36	76.6	93.0	2,015	42.9	39.5	
\$100,001 - \$250,000	6	14.0	4.1	978	19.4	18.6	7	14.9	4.0	998	21.3	17.7	
\$250,001 - \$1 Million	5	11.6	3.1	2,385	47.2	43.1	4	8.5	3.1	1,680	35.8	42.8	
Total	43	100.0	100.0	5,052	100.0	100.0	47	100.0	100.0	4,693	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	30	76.9		1,611	36.4		34	79.1		1,933	47.5		
\$100,001 - \$250,000	5	12.8		733	16.6		6	14.0		753	18.5		
\$250,001 - \$1 Million	4	10.3		2,085	47.1		3	7.0		1,380	33.9		
Total	39	100.0		4,429	100.0		43	100.0		4,066	100.0		
Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

APPENDIX D – NONMETROPOLITAN LIMITED-SCOPE ASSESSMENT AREA

TABLE D-1

2023 Val Verde County Nonmetropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,247	26.7
Moderate	5	35.7	5,010	41.2	939	18.7	2,253	18.5
Middle	6	42.9	5,323	43.7	881	16.6	2,372	19.5
Upper	2	14.3	1,841	15.1	155	8.4	4,302	35.3
Unknown	1	7.1	0	0.0	0	0.0	0	0.0
Total AA	14	100.0	12,174	100.0	1,975	16.2	12,174	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	7,604	4,104	38.6	54.0	2,582	34.0	918	12.1
Middle	9,075	4,721	44.4	52.0	2,624	28.9	1,730	19.1
Upper	2,553	1,798	16.9	70.4	559	21.9	196	7.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	19,232	10,623	100.0	55.2	5,765	30.0	2,844	14.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	500	39.8	460	39.5	35	45.5	5	38.5
Middle	489	39.0	452	38.8	31	40.3	6	46.2
Upper	265	21.1	252	21.6	11	14.3	2	15.4
Unknown	1	0.1	1	0.1	0	0.0	0	0.0
Total AA	1,255	100.0	1,165	100.0	77	100.0	13	100.0
Percentage of Total Businesses:				92.8		6.1		1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	8	25.0	7	22.6	1	100.0	0	0.0
Middle	15	46.9	15	48.4	0	0.0	0	0.0
Upper	9	28.1	9	29.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	32	100.0	31	100.0	1	100.0	0	0.0
Percentage of Total Farms:				96.9		3.1		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

TABLE D-2

2024 Val Verde County Nonmetropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	3,250	26.7
Moderate	5	35.7	5,010	41.2	939	18.7	2,255	18.5
Middle	6	42.9	5,323	43.7	881	16.6	2,372	19.5
Upper	2	14.3	1,841	15.1	155	8.4	4,297	35.3
Unknown	1	7.1	0	0.0	0	0.0	0	0.0
Total AA	14	100.0	12,174	100.0	1,975	16.2	12,174	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	7,604	4,104	38.6	54.0	2,582	34.0	918	12.1
Middle	9,075	4,721	44.4	52.0	2,624	28.9	1,730	19.1
Upper	2,553	1,798	16.9	70.4	559	21.9	196	7.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	19,232	10,623	100.0	55.2	5,765	30.0	2,844	14.8
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	477	40.7	442	40.5	30	44.1	5	45.5
Middle	439	37.5	407	37.3	28	41.2	4	36.4
Upper	252	21.5	240	22.0	10	14.7	2	18.2
Unknown	3	0.3	3	0.3	0	0.0	0	0.0
Total AA	1,171	100.0	1,092	100.0	68	100.0	11	100.0
Percentage of Total Businesses:			93.3		5.8		0.9	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	8	26.7	7	24.1	1	100.0	0	0.0
Middle	13	43.3	13	44.8	0	0.0	0	0.0
Upper	9	30.0	9	31.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	30	100.0	29	100.0	1	100.0	0	0.0
Percentage of Total Farms:			96.7		3.3		0.0	
Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

TABLE D-3A

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Val Verde County Nonmetropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %	
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%		\$%
Home Purchase Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	20.0	28.5	516	24.0	24.2	1	33.3	31.7	292	43.6	27.6	38.6
Middle	3	30.0	37.4	628	29.2	34.2	1	33.3	35.1	105	15.7	32.8	44.4
Upper	5	50.0	34.1	1,008	46.8	41.6	1	33.3	33.2	272	40.7	39.6	16.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	10	100.0	100.0	2,152	100.0	100.0	3	100.0	100.0	669	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	36.7	0	0.0	38.0	0	0.0	36.4	0	0.0	33.7	38.6
Middle	0	0.0	43.3	0	0.0	39.9	1	100.0	35.5	125	100.0	31.4	44.4
Upper	0	0.0	20.0	0	0.0	22.2	0	0.0	28.0	0	0.0	34.9	16.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	125	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	66.7	20.0	95	76.0	23.9	1	100.0	50.0	25	100.0	58.3	38.6
Middle	1	33.3	40.0	30	24.0	42.3	0	0.0	33.3	0	0.0	24.9	44.4
Upper	0	0.0	40.0	0	0.0	33.9	0	0.0	16.7	0	0.0	16.8	16.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	125	100.0	100.0	1	100.0	100.0	25	100.0	100.0	100.0
Multifamily Loans												Multi-family Units %	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	1	50.0	0.0	292	48.1	0.0	62.4
Middle	1	100.0	50.0	1,400	100.0	71.0	1	50.0	0.0	315	51.9	0.0	29.1
Upper	0	0.0	50.0	0	0.0	29.0	0	0.0	0.0	0	0.0	0.0	8.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	1,400	100.0	100.0	2	100.0	0.0	607	100.0	0.0	100.0
Total Home Mortgage Loans												Owner Occupied Units %	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	28.6	29.9	611	16.6	25.7	5	55.6	32.2	1,113	57.7	28.7	38.6
Middle	5	35.7	37.9	2,058	56.0	34.7	3	33.3	35.7	545	28.2	32.7	44.4
Upper	5	35.7	32.2	1,008	27.4	39.5	1	11.1	32.1	272	14.1	38.6	16.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	14	100.0	100.0	3,677	100.0	100.0	9	100.0	100.0	1,930	100.0	100.0	100.0

Source: 2024 FFIEC Census Data

2016-2020 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-3B

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography Assessment Area: Val Verde County Nonmetropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	75.0	0	0.0	71.2	0	0.0	42.9	0	0.0	62.6	38.6
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	42.9	0	0.0	28.6	44.4
Upper	0	0.0	25.0	0	0.0	28.8	0	0.0	14.3	0	0.0	8.8	16.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	53.8	0	0.0	56.6	2	100.0	11.8	504	100.0	7.8	38.6
Middle	0	0.0	30.8	0	0.0	33.8	0	0.0	52.9	0	0.0	50.0	44.4
Upper	0	0.0	15.4	0	0.0	9.7	0	0.0	35.3	0	0.0	42.2	16.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	504	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	42.9	0	0.0	52.7	0	0.0	0.0	0	0.0	0.0	38.6
Middle	0	0.0	57.1	0	0.0	47.3	0	0.0	0.0	0	0.0	0.0	44.4
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	16.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	100.0

Source: 2024 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-4A

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Val Verde County Nonmetropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#	\$	#	\$	#	%	#	\$	#	%	
Home Purchase Loans													
Low	0	0.0	1.1	0	0.0	0.5	0	0.0	1.6	0	0.0	0.9	26.7
Moderate	1	10.0	10.6	103	4.8	6.2	0	0.0	9.9	0	0.0	7.5	18.5
Middle	1	10.0	25.0	151	7.0	21.1	0	0.0	21.7	0	0.0	19.2	19.5
Upper	7	70.0	42.2	1,752	81.4	49.8	3	100.0	40.0	669	100.0	48.9	35.3
Unknown	1	10.0	21.2	146	6.8	22.3	0	0.0	26.8	0	0.0	23.5	0.0
Total	10	100.0	100.0	2,152	100.0	100.0	3	100.0	100.0	669	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	5.0	0	0.0	2.9	0	0.0	3.7	0	0.0	1.7	26.7
Moderate	0	0.0	16.7	0	0.0	10.2	0	0.0	10.3	0	0.0	6.8	18.5
Middle	0	0.0	31.7	0	0.0	31.9	0	0.0	13.1	0	0.0	9.8	19.5
Upper	0	0.0	36.7	0	0.0	43.2	1	100.0	37.4	125	100.0	39.2	35.3
Unknown	0	0.0	10.0	0	0.0	11.9	0	0.0	35.5	0	0.0	42.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	125	100.0	100.0	100.0
Home Improvement Loans													
Low	1	33.3	0.0	55	44.0	0.0	1	100.0	16.7	25	100.0	24.5	26.7
Moderate	1	33.3	20.0	40	32.0	15.0	0	0.0	0.0	0	0.0	0.0	18.5
Middle	1	33.3	26.7	30	24.0	32.7	0	0.0	16.7	0	0.0	11.5	19.5
Upper	0	0.0	53.3	0	0.0	52.4	0	0.0	50.0	0	0.0	41.5	35.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	16.7	0	0.0	22.6	0.0
Total	3	100.0	100.0	125	100.0	100.0	1	100.0	100.0	25	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	7.7	1.4	55	2.4	0.7	2	28.6	2.1	81	6.1	1.1	26.7
Moderate	2	15.4	11.6	143	6.3	6.8	0	0.0	9.7	0	0.0	7.3	18.5
Middle	2	15.4	25.5	181	7.9	22.2	0	0.0	20.1	0	0.0	17.6	19.5
Upper	7	53.8	41.7	1,752	76.9	49.2	5	71.4	41.0	1,242	93.9	47.8	35.3
Unknown	1	7.7	19.8	146	6.4	21.1	0	0.0	27.1	0	0.0	26.2	0.0
Total	13	100.0	100.0	2,277	100.0	100.0	7	100.0	100.0	1,323	100.0	100.0	100.0
Source: 2024 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

TABLE D-4B

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Val Verde County Nonmetropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year											Families by Family Income %	
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%		%
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	26.7
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	18.5
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	14.3	0	0.0	8.8	19.5
Upper	0	0.0	100.0	0	0.0	100.0	0	0.0	85.7	0	0.0	91.2	35.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.0	0	0.0	0.0	1	50.0	5.9	56	11.1	5.0	26.7
Moderate	0	0.0	23.1	0	0.0	22.9	0	0.0	5.9	0	0.0	5.4	18.5
Middle	0	0.0	38.5	0	0.0	43.8	0	0.0	17.6	0	0.0	17.6	19.5
Upper	0	0.0	38.5	0	0.0	33.3	1	50.0	70.6	448	88.9	71.9	35.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	504	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	26.7
Moderate	0	0.0	14.3	0	0.0	16.3	0	0.0	0.0	0	0.0	0.0	18.5
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	19.5
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	35.3
Unknown	0	0.0	85.7	0	0.0	83.7	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	100.0
Source: 2024 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

TABLE D-5

Distribution of 2023 and 2024 Small Business Lending By Income Level of Geography Assessment Area: Val Verde County Nonmetropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	66	36.1	38.2	2,552	28.0	45.4	82	43.4	39.6	3,056	39.0	45.9	40.7
Middle	76	41.5	32.0	4,363	47.9	21.9	72	38.1	35.0	2,369	30.2	26.9	37.5
Upper	41	22.4	29.0	2,191	24.1	32.5	35	18.5	24.3	2,419	30.8	26.1	21.5
Unknown	0	0.0	0.2	0	0.0	0.0	0	0.0	0.2	0	0.0	0.2	0.3
Total	183	100.0	100.0	9,106	100.0	100.0	189	100.0	100.0	7,844	100.0	100.0	100.0

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

TABLE D-6

Distribution of 2023 and 2024 Small Business Lending By Revenue Size of Businesses Assessment Area: Val Verde County Nonmetropolitan													
	Bank And Aggregate Loans By Year												Total Businesses %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	150	82.0	42.6	4,605	50.6	45.2	159	84.1	46.3	4,904	62.5	37.2	93.3
Over \$1 Million	31	16.9		4,352	47.8		29	15.3		2,820	36.0		5.8
Revenue Unknown	2	1.1		149	1.6		1	0.5		120	1.5		0.9
Total	183	100.0		9,106	100.0		189	100.0		7,844	100.0		100.0
By Loan Size													
\$100,000 or Less	156	85.2	96.3	3,630	39.9	51.6	168	88.9	95.8	3,679	46.9	45.9	
\$100,001 - \$250,000	24	13.1	2.1	3,781	41.5	15.9	18	9.5	2.3	2,865	36.5	15.6	
\$250,001 - \$1 Million	3	1.6	1.6	1,695	18.6	32.5	3	1.6	2.0	1,300	16.6	38.5	
Total	183	100.0	100.0	9,106	100.0	100.0	189	100.0	100.0	7,844	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	139	92.7		2,965	64.4		148	93.1		2,752	56.1		
\$100,001 - \$250,000	11	7.3		1,640	35.6		9	5.7		1,302	26.5		
\$250,001 - \$1 Million	0	0.0		0	0.0		2	1.3		850	17.3		
Total	150	100.0		4,605	100.0		159	100.0		4,904	100.0		

Source: 2024 FFIEC Census Data
2024 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX E – GLOSSARY

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/assessment area.

Census tract: A small, relatively permanent statistical subdivision of a county. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts average about 4,000 inhabitants, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to the population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language:

1. Affordable housing (including multi-family rental housing) for low- or moderate-income individuals.
2. Community services targeted to low- or moderate-income individuals.
3. 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.
4. Activities that revitalize or stabilize –
 - a. Low- or moderate-income geographies.
 - b. Designated disaster areas.
 - c. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - i. Rates of poverty, unemployment, and population loss.
 - ii. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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 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 income of the applicants; the amount of loan requested; and the disposition of the application (for example, approved, denied, or withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

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.

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

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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

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

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

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

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

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

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): 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.

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