

PUBLIC DISCLOSURE

August 4, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Benchmark Bank
RSSD # 980960
5700 Legacy Dr, Suite 10
Plano, Texas 75024

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'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: **Satisfactory**.

The lending test is rated: **Satisfactory**.

The community development (CD) test is rated: **Satisfactory**.

Benchmark Bank (Benchmark or bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria under the lending and CD tests:

- Benchmark's eight-quarter average net loan-to-deposit ratio (NLTD) is reasonable given the bank's asset size, financial condition, and the credit needs of the assessment areas (AAs).
- A majority of the bank's loans are originated inside the AAs.
- A reasonable distribution of loans occurs throughout Benchmark's AAs.
- Lending reflects a reasonable distribution among individuals of different income levels, including low- and moderate-income (LMI), and businesses of different revenue sizes.
- The bank has taken appropriate action in response to substantiated complaints.
- CD activity reflects adequate responsiveness to the needs of the AAs.

SCOPE OF THE EVALUATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* to evaluate the bank's Community Reinvestment Act (CRA) performance. The evaluation considered performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as demographic and economic characteristics and credit needs of the AAs. Performance was assessed within the bank's three AAs: the Dallas Metropolitan AA, the Austin Metropolitan AA, and the Houston Metropolitan AA. The Dallas Metropolitan AA was selected for a full-scope review based on the bank's branches serving the area, loan volume, and deposit activity. In all, 42.9 percent of branches, 88.1 percent of loans, and 75.9 percent of deposits were included in the full-scope review. The Austin Metropolitan AA and the Houston Metropolitan AA received limited-scope reviews.

Examiners reviewed the following data to assess Benchmark's CRA performance:

- The bank's eight-quarter average NLTD ratio, ending March 31, 2025;
- A statistically derived sample of the bank's commercial loans, which consists of 103 small business loans selected from a universe of 210 loans originated between January 1, 2023, to December 31, 2024;
- The universe of residential real estate lending activity reported on the bank's 2023 Home Mortgage Disclosure Act (HMDA) Loan/Application Register, which totaled 42 loans originated or purchased between January 1, 2023, and December 31, 2023;
- Qualified CD loans, investments, and services originated or conducted between May 16, 2023, through August 4, 2025;
- All CRA related complaints received by the Reserve Bank or the institution; and
- Information provided by two representatives of the communities specializing in affordable housing and small business development in the Dallas Metropolitan AA to better understand the credit and CD needs as well as the economic conditions.

DESCRIPTION OF THE INSTITUTION

Benchmark, a community bank headquartered in Plano, Texas, has the following characteristics:

- The bank is a wholly owned subsidiary of Quinlan Bancshares, Inc., a single bank holding company.
- As of March 31, 2025, Benchmark reported total assets of \$1.2 billion.
- The bank operates seven branches across the state of Texas, with a deposit-taking automated teller machine (ATM) available at each location and one deposit-taking standalone ATM.
- As shown in Table 1, Benchmark is primarily a commercial lender, with commercial loans representing 58.9 percent of the bank's loan portfolio as of March 31, 2025. Residential real estate loans comprise a much smaller but still material portion of the loan portfolio.

Table 1

Composition of Loan Portfolio as of March 31, 2025		
Loan Type	\$(000)	%
Agricultural	4,842	0.5
Commercial	537,021	58.9
Consumer	12,223	1.3
Residential Real Estate	203,716	22.4
Other	153,490	16.8
Gross Loans	911,292	100.0
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The Federal Deposit Insurance Corporation (FDIC) rated Benchmark's performance as **Satisfactory** at the previous CRA evaluation dated May 15, 2023. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS¹

LENDING TEST

This performance evaluation first discusses the bank's overall performance, followed by an in-depth discussion of Benchmark's performance in the Dallas Metropolitan AA (full-scope review) and a brief discussion of its performance in the Austin Metropolitan AA and the Houston Metropolitan AA (limited-scope review).

Benchmark's overall performance under the lending test is Satisfactory. This rating is based on a reasonable NLTD ratio, a majority of loans originated within the bank's AAs, an overall reasonable geographic and borrower distribution of loans within Benchmark's full-scope AA, and appropriate action taken in response to CRA related complaints. Each of the performance criteria considered under this test is discussed below.

¹ The NLTD ratio and percentage of loans and other lending-related activity in the AAs are only discussed in the institution overall. No discussion of these performance criteria is noted in the sections of the performance evaluation related to individual AAs.

Overall conclusions are based on Benchmark's CRA performance in the Dallas Metropolitan AA, which includes the majority of lending and deposit activity as well as the bank's locations. Performance in the Austin Metropolitan AA and the Houston Metropolitan AA did not impact overall ratings but are presented for comparative purposes.

In general, more consideration was given to the volume of loan originations than the dollar amount, as this represents the number of individuals or entities served. Additionally, for home mortgage lending, examiners considered the bank's performance compared to the performance of other HMDA-reporting institutions operating in the area (aggregate HMDA reporters), rather than respective demographic figures, as aggregate lending is considered a better indicator of credit demand. However, aggregate lending data related to small business lending was not relied upon, as Benchmark was not a reporter of small business loan data during this evaluation. When assessing the bank's performance in meeting the credit needs of the delineated AAs, small business lending carried greater weight, as it aligns with Benchmark's strategic focus and constitutes the majority of its lending volume.

Net Loan-to-Deposit Ratio

This performance criterion evaluates Benchmark's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as the bank's asset size, capacity to lend, availability of lending opportunities, and the demographic and economic factors present in the AAs. Furthermore, Benchmark's performance was compared to similarly situated institutions insured by the FDIC, which were selected based on asset size, geographic footprint, and loan portfolio composition.

Benchmark's NLTD ratio is reasonable. As illustrated in Table 2, Benchmark's eight-quarter average NLTD ratio at 74.9 percent falls within the average NLTD ratios of three similarly situated banks, which ranged between 69.7 and 86.7 percent. This level of lending reflects positively on Benchmark's efforts to meet the credit needs of its AAs.

Table 2

Comparative Net Loan-to-Deposit Ratios April 1, 2023 – March 31, 2025			
Institution	Location	Asset Size \$(000)	Eight-Quarter Average NLTD Ratio (%)
Benchmark Bank	Plano, Texas	1,218,286	74.9
Similarly Situated Institutions			
Comparator Banks	Houston, Texas	1,216,776	86.7
	Sulphur Springs, Texas	1,387,814	69.7
	Nacogdoches, Texas	1,537,538	72.1

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank's delineated AAs.

Benchmark originated a majority of its loans, by number volume and dollar amount, inside its AAs. During the review period, the bank originated 63.2 percent of its loans by number volume within

its delineated AAs. It is noteworthy that many of the loans extended outside the delineated AAs fell within the metropolitan areas in which the bank operates.

Table 3

Lending Inside and Outside the Assessment Areas								
Loan Type	Inside				Outside			
	#	#%	\$(000)	%	#	#%	\$(000)	%
Home Purchase	14	73.7	25,772	79.0	5	26.3	6,868	21.0
Refinancing	4	66.7	4,367	84.4	2	33.3	809	15.6
Home Improvement	1	100.0	62	100.0	0	0.0	0	0.0
Multi-Family Housing	1	33.3	1,643	41.4	2	66.7	2,325	58.6
Other Purpose Closed-End	1	100.0	575	100.0	0	0.0	0	0.0
Total HMDA	21	70.0	32,419	76.4	9	30.0	10,002	23.6
Total Small Business	63	61.2	9,314	54.4	40	38.8	7,813	45.6
TOTAL LOANS	84	63.2	41,733	70.1	49	36.8	17,815	29.9
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>								

The remaining analysis is based on the loans made inside the bank's AAs.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within the delineated AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs in light of performance context, such as strategic focus, lending opportunities, and geographic characteristics. Benchmark's overall geographic distribution of loans reflects reasonable distribution among census tracts of different income levels, with no notable lending gaps identified.

Lending to Borrowers of Different Income Levels and to 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. Benchmark's lending has an overall reasonable distribution among individuals of different income levels and businesses of different revenue sizes.

Response to Complaints

Benchmark's record of taking action in response to complaints about its performance in helping to meet the credit needs in its AAs is appropriate. A member of the community submitted a comment letter related to Benchmark's lending performance within the bank's delineated AAs. Benchmark responded to the comment letter thoroughly and in a timely matter. The Reserve Bank considered the community member's comments and the bank's response to determine the scope of the evaluation and to reach conclusions regarding Benchmark's overall performance in helping to meet the credit needs of the delineated AAs.

COMMUNITY DEVELOPMENT TEST

The CD test evaluates the bank's responsiveness to the CD needs of the delineated AAs through qualified loans, investments, and services, considering Benchmark's capacity and the need and availability of such opportunities in the AAs.

Benchmark's overall performance under the CD test is rated Satisfactory and demonstrates adequate responsiveness to the needs of the communities in which the bank operates. As reflected in Table 4, Benchmark originated a total of 58 CD loans totaling \$75.3 million. Of those, 45 CD loans for a total of \$50.3 million directly benefited Benchmark's AAs. These activities demonstrate a meaningful commitment to addressing key needs within the AAs, particularly economic development and affordable housing, which were identified as increasing CD needs by a community contact.

As Benchmark met the CD needs of its AAs, consideration was also given to CD activity conducted outside of the delineated AAs, but within the broader statewide or regional area that includes them. During the review period, Benchmark originated 13 CD loans totaling \$25.0 million, primarily supporting small businesses located outside the delineated AAs. These loans contributed to economic development by creating and retaining jobs and expanding access to credit for businesses that serve or are owned by LMI individuals.

Notable CD activities include:

- A \$5.4 million CD loan to support housing stability in the community.
- A \$1.0 million loan to address the need for cost accessible housing in the AAs by financing a residential development in which 100 percent of the units will be leased to LMI households.
- Benchmark donated \$21,500 to promote economic development by supporting small businesses, including initiatives designed to create and maintain jobs in the AA.

In addition to CD loans, Benchmark provided 85 donations to various non-profit and community-oriented groups, totaling about \$398,000. The majority of these are centered on services targeted to LMI individuals or to benefit LMI geographies. Furthermore, \$14,900 in donations primarily to community development financial institutions (CDFIs) focused on revitalizing and stabilizing LMI geographies.

Benchmark employees engaged in 107 CD service activities during the review period. Through service activities, bank employees shared their financial expertise to provide financial education to small business owners and technical assistance to non-profit organizations.

An expanded discussion of Benchmark's CD activity in the AAs receiving full-scope review can be found in the Conclusions with Respect to Performance Tests in the Dallas Metropolitan AA section below.

Table 4

Community Development Activity Assessment Area: All									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	24	17,935	1	993	0	0	1	993	10
Community Services	4	17,360	0	0	75	361	75	361	89
Economic Development	8	5,245	0	0	7	21	7	21	8
Revitalization and Stabilization	22	34,770	0	0	3	15	3	15	0
Totals	58	75,310	1	993	85	397	86	1,390	107
Note: Totals may not be exact due to rounding.									

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.

DALLAS METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE DALLAS METROPOLITAN ASSESSMENT AREA

- During the review period, the Dallas Metropolitan AA consisted of 594 contiguous census tracts out of the 1,058 geographies (56.1 percent) in Collin, Dallas, and Denton counties. Of the 384 LMI census tracts in the aforementioned counties, the bank's AA includes 173 (45.1 percent).
- Collin, Dallas, and Denton counties are part of the Dallas-Plano-Irving, TX Metropolitan Division (MD). The MD also includes Ellis, Hunt, Kaufman, and Rockwall counties; however, these were not a part of the delineated AA. There have not been any changes to the AA delineation since the prior evaluation. Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- Benchmark operates three full-service branches in the AA, including one located in a middle-income and two in upper-income census tracts. In addition, the bank operates one deposit-taking standalone ATM in this AA.
- According to American Community Survey (ACS) data, the AA consists of 594 census tracts, of which 54 are low-income (9.1 percent), 119 moderate-income (20.0 percent), 137 middle-income (23.1 percent), and 268 upper-income (45.1 percent), and 16 unknown-income census tracts (2.7 percent).
- According to the June 30, 2024, FDIC's Deposit Market Share Report, Benchmark held 0.1 percent of the deposit market share, ranking 38th out of 142 FDIC-insured depository institutions operating in the AA counties. Approximately 75.9 percent of the bank's total deposits are within this AA.
- In 2023, Benchmark originated or purchased 18 HMDA-reportable loans, representing less than 0.1 percent of the 101,783 loans originated by HMDA-reporting lenders in the AA. Top lenders in the AA include large mortgage institutions, such as PennyMac Loan Services, LLC with 6.0 percent and United Wholesale Mortgage, LLC with 4.5 percent.
- A community contact noted that local banks in the AA are engaged and actively participate in community events to support small business owners. The community contact indicated that expanded opportunities for small businesses are needed, especially those that allow new businesses access to credit and financial education.

Table 5
Population Change
Assessment Area: Dallas Metropolitan

Area	2015 Population	2020 Population	Percent Change
Dallas Metropolitan	4,079,069	4,584,426	12.4
Collin County, TX	862,215	1,064,465	23.5
Dallas County, TX	2,485,003	2,613,539	5.2
Denton County, TX	731,851	906,422	23.9
Dallas-Plano-Irving, TX MD	4,519,004	5,129,966	13.5
Texas	26,538,614	29,145,505	9.8
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

- As illustrated in Table 5, population trends between 2015 and 2020 reflect significant growth throughout the AA counties. This growth is likely to impact credit needs as individuals and families relocating to the area seek housing and participate in consumer spending.
- While the population growth in Denton and Collin counties more than doubled the statewide growth rate, the population growth in Dallas County was significantly lower. This indicates that families moving into the area prefer to reside in suburban areas rather than in the city's core.
- A community leader attributed the recent population growth to the influx of companies relocating to the Dallas area, noting that these businesses bring high-paying jobs and attract highly compensated professionals to the AA.

Table 6

Median Family Income Change Assessment Area: Dallas Metropolitan			
Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Dallas Metropolitan	77,264	87,198	12.9
Collin County, TX	110,174	118,341	7.4
Dallas County, TX	61,072	69,689	14.1
Denton County, TX	99,628	111,436	11.9
Dallas-Plano-Irving, TX MD	77,736	88,315	13.6
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.			

- As shown in Table 6, the AA median family income (MFI) increased \$9,934 or 12.9 percent, slightly exceeding the statewide growth rate of 11.0 percent.
- Collin County experienced the lowest rate increase; however, it continues to hold the highest MFI figure in the AA. Meanwhile, Dallas County residents reported a 14.1 percent increase in MFI but the county remains significantly below the AA's MFI due to the high MFI reported by residents in Collin and Denton counties.
- According to the FFIEC Census data, 7.3 percent of AA families live below the poverty level, which is less than the statewide figure of 10.9 percent.
- Approximately 26.6 percent of families within the AA reside in LMI census tracts, and 35.7 percent of families in the AA are considered LMI based on family income.

Table 7

Housing Cost Burden Rates Assessment Area: Dallas Metropolitan						
Area	Cost Burden - Renters			Cost Burden – Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Dallas Metropolitan	83.0	52.1	42.9	65.9	38.9	21.3
Collin County, TX	85.2	68.1	40.2	71.2	50.5	19.8
Dallas County, TX	81.6	46.6	43.7	63.7	32.8	23.2
Denton County, TX	88.4	58.5	42.7	70.7	50.0	19.0
Dallas-Plano-Irving, TX MD	82.7	51.6	43.0	65.1	38.0	21.1
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 illustrated in Table 7, LMI homeowners in the AA face less of a housing cost burden than LMI renters, as 83.0 percent of low-income renters and 52.1 percent of moderate-income renters spend 30.0 percent or more of their income on housing. In contrast, 65.9 percent of low-income homeowners and 38.9 percent of moderate-income homeowners face the same level of housing burden. Table 7 further indicates that LMI families in the AA face higher housing burden than families residing in other parts of Texas.
- The median housing value in the AA is \$316,722, and the median gross rent is \$1,261. Housing values and rent costs vary significantly in the AA based on their location.
- The median age of housing stock is 37 years old. Generally, LMI census tracts have older homes, while newer homes are located in upper-income census tracts.
- A local contact indicated that elevated interest rates and gentrification create affordability challenges for LMI residents, resulting in additional needs for affordable housing.

Table 8

Unemployment Rates Assessment Area: Dallas Metropolitan					
Area	2020	2021	2022	2023	2024
Dallas Metropolitan	7.2	5.1	3.6	3.8	3.9
Collin County, TX	6.5	4.5	3.3	3.6	3.8
Dallas County, TX	7.8	5.6	3.8	4.0	4.1
Denton County, TX	6.6	4.5	3.3	3.6	3.7
Dallas-Plano-Irving, TX MD	7.1	5.0	3.6	3.8	3.9
Texas	7.7	5.6	3.9	4.0	4.1

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- Generally, unemployment rates in the AA are stable and are not likely to significantly impact credit needs.
- As depicted in Table 8, the AA unemployment rate dropped by nearly half between 2020 and 2022, demonstrating strong economic recovery after the COVID-19 pandemic.
- While the AA continually reports lower unemployment rates than the state, Dallas County consistently reports higher unemployment rates than Collin and Denton counties, pointing to uneven economic opportunity across the AA.
- Major industries within the AA include healthcare and social assistance, retail trade, and accommodation and food services. The AA hosts a variety of large employers operating

across multiple sectors of the economy, including Amazon, AT&T, Baylor Health Care System, Kroger, and Tenet Healthcare, among others.

Table 9

Home Mortgage Loan Trends Assessment Area: Dallas Metropolitan					
Area	2019	2020	2021	2022	2023
Dallas Metropolitan	106,363	186,370	182,586	96,850	69,682
Collin County, TX	32,626	63,069	61,086	30,462	23,244
Dallas County, TX	42,332	66,645	66,712	36,920	25,308
Denton County, TX	31,405	56,656	54,788	29,468	21,130
Dallas-Plano-Irving, TX MD	124,069	216,785	215,254	118,886	84,873
Texas	592,278	976,795	1,008,094	592,384	419,006
Source: Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act Loan/Application Records					

- As highlighted in Table 9, mortgage loan volumes (originated by all mortgage lenders) in the AA peaked in 2020 as lower interest rates, expansive work from home policies, and government stimulus motivated individuals and families to purchase homes and/or refinance existing mortgage loans. This trend decelerated in 2021 and dropped significantly in 2022 and 2023 given the increasing interest rate environment. By 2023, the mortgage loan activity had declined approximately 62.6 percent.
- The decline in mortgage originations illustrates the challenges banks face in originating home mortgage loans under current market conditions, including rising rates and high home prices, which disproportionately impact LMI applicants.
- Community contacts emphasized that LMI households are increasingly excluded from homeownership, underscoring credit needs like affordable mortgages and housing initiatives.

Table 10 details key demographic information for the AA.

Table 10

2024 Combined Demographics Assessment Area: Dallas Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	54	9.1	46,609	7.9	11,498	24.7	119,259	20.1
Moderate	119	20.0	111,124	18.7	15,016	13.5	92,716	15.6
Middle	137	23.1	138,792	23.4	7,809	5.6	101,409	17.1
Upper	268	45.1	291,093	49.1	8,267	2.8	279,537	47.1
Unknown	16	2.7	5,303	0.9	968	18.3	0	0.0
Total AA	594	100.0	592,921	100.0	43,558	7.3	592,921	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	98,173	18,574	3.8	18.9	67,472	68.7	12,127	12.4
Moderate	199,030	68,601	14.0	34.5	113,114	56.8	17,315	8.7
Middle	251,684	112,965	23.0	44.9	119,953	47.7	18,766	7.5
Upper	441,475	287,690	58.6	65.2	125,061	28.3	28,724	6.5
Unknown	16,566	3,178	0.6	19.2	11,151	67.3	2,237	13.5
Total AA	1,006,928	491,008	100.0	48.8	436,751	43.4	79,169	7.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	7,642	4.9	6,854	4.8	731	6.3	57	2.8
Moderate	23,175	14.9	20,963	14.7	2,008	17.4	204	10.0
Middle	43,891	28.2	39,325	27.7	4,104	35.6	462	22.7
Upper	78,994	50.7	73,246	51.5	4,456	38.7	1,292	63.5
Unknown	2,024	1.3	1,777	1.2	226	2.0	21	1.0
Total AA	155,726	100.0	142,165	100.0	11,525	100.0	2,036	100.0
Percentage of Total Businesses:				91.3		7.4		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	25	2.6	25	2.7	0	0.0	0	0.0
Moderate	84	8.8	82	8.7	2	11.8	0	0.0
Middle	236	24.6	229	24.3	7	41.2	0	0.0
Upper	606	63.1	597	63.4	8	47.1	1	100.0
Unknown	9	0.9	9	1.0	0	0.0	0	0.0
Total AA	960	100.0	942	100.0	17	100.0	1	100.0
Percentage of Total Farms:				98.1		1.8		0.1
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 IN THE DALLAS METROPOLITAN AREA

LENDING TEST

Benchmark's lending performance in the Dallas Metropolitan AA is reasonable. The geographic distribution of the bank's lending reflects reasonable dispersion throughout the AA. Similarly, Benchmark exhibited reasonable penetration among borrowers of different income levels and businesses of different revenue sizes. While the analysis included both HMDA-reportable and small business loans, small business lending carried more weight in the overall conclusions, given that the bank is primarily a commercial lender and originated a limited volume of HMDA-reportable loans in the AA during the review period. While the bank offers HMDA-reportable loans, it is not a major lender due to the high level of competition. As such, lower levels of HMDA lending are not indicative of the bank failing to meet credit needs in the AA. Furthermore, the bank's performance considered HMDA loan products as a whole instead of by product type due to the limited volume of originations.

Geographic Distribution of Loans

This performance criterion evaluates the distribution of lending within the AA by income level of census tracts with consideration given to the dispersion of loans throughout the AA. Benchmark's geographic distribution of loans reflects a reasonable distribution among LMI census tracts, with no notable lending gaps identified. The following sections provide additional context and analysis of the geographic distribution by HMDA-reportable and small business loans to explain the factors contributing to the bank's performance.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA-reportable loans reflects reasonable penetration throughout the AA when compared to the percentage of owner-occupied housing units located in LMI census tracts (demographic figure) and the performance of aggregate HMDA reporters originating mortgage loans in the AA. In 2023, Benchmark did not originate any HMDA-reportable loans in low-income census tracts. Aggregate HMDA reporters, on the other hand, originated 4.3 percent of HMDA-reportable loans in such geographies. In moderate-income census tracts, Benchmark's HMDA lending activity was slightly below aggregate HMDA reporters in terms of the percentage of loans originated. Demand for HMDA-reportable loans in moderate-income census tracts is evident, as reflected by the fact that aggregate HMDA reporters matched the demographic.

Benchmark's performance, while below both aggregate HMDA reporters and the demographic figure, is reasonable based on its market position in a highly competitive market and its strategic focus on commercial lending. As previously mentioned, Benchmark holds less than 0.1 percent of the AA's HMDA and deposit market shares. Furthermore, HMDA originations declined sharply between 2020 and 2023, further intensifying competition among mortgage lenders. It is notable that the majority of owner-occupied units within the AA are located in upper-income census tracts, while only 17.8 percent are in LMI census tracts.

Table 11

Distribution of 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: Dallas Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	4.3	0	0.0	3.6	3.8
Moderate	2	11.1	14.0	422	1.5	10.2	14.0
Middle	0	0.0	34.2	0	0.0	29.7	23.0
Upper	16	88.9	47.2	27,567	98.5	55.2	58.6
Unknown	0	0.0	0.4	0	0.0	1.4	0.6
Total	18	100.0	100.0	27,989	100.0	100.0	100.0

Source: 2023 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 geographic distribution of small business lending is reasonable. As depicted in Table 12, in 2024 Benchmark's small business lending in low-income census tracts was similar to the percentage of businesses located in those areas. Within moderate-income census tracts, Benchmark's small business lending exceeded the percentage of businesses operating there. In 2023, Benchmark did not originate any loans in LMI census tracts; however, the bank only made five small business loans that year. Given the very low volume of lending in 2023, the conclusions regarding the geographic distribution of small business loans are based on the bank's performance in 2024, which demonstrates responsiveness to the needs of small businesses considering the bank's market presence and competition in the AA.

Table 12

TABLE 12

Distribution of 2023 and 2024 Small Business Lending by Income Level of Geography Assessment Area: Dallas Metropolitan									
Geographic Income Level	Bank Loans by Year								Total Businesses %
	2023				2024				
	#	#%	\$(000)	%	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	2	3.9	545	8.3	4.9
Moderate	0	0.0	0	0.0	9	17.6	457	6.9	14.9
Middle	1	20.0	165	16.2	15	29.4	1,654	25.1	28.2
Upper	4	80.0	854	83.8	24	47.1	3,528	53.6	50.7
Unknown	0	0.0	0	0.0	1	2.0	400	6.1	1.3
Total	5	100.0	1,019	100.0	51	100.0	6,584	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 to Businesses of Different Revenue Sizes

This performance criterion evaluates the distribution of lending among borrowers of different income levels and businesses of different revenue sizes. Overall, Benchmark's lending reflects a reasonable distribution among individuals of different income levels and businesses of different revenue sizes.

Residential Real Estate (HMDA) Lending

The distribution of HMDA lending to borrowers of different income levels is poor when compared to demographic characteristics as well as the performance of aggregate lenders. As illustrated in Table 13, Benchmark only originated one HMDA-reportable loan to a moderate-income borrower and no loans to low-income borrowers during the review period. Approximately 20.1 percent of families in the AA are low-income families and 15.6 percent are moderate-income families (demographic figure). Aggregate HMDA reporters also struggled to make loans to low-income borrowers, which reflects economic challenges in the AA as well as lower loan demand. A community contact noted LMI families face challenges securing mortgage lending due to insufficient downpayment funds, lack of affordable housing in the area, and elevated interest rates. Moreover, these challenges are more likely to impact LMI borrowers more than middle- and upper-income borrowers. Despite these challenges, aggregate HMDA reporters originated a much higher percentage of HMDA-reportable loans to LMI borrowers while Benchmark originated 76.5 percent of HMDA-reportable lending to upper-income borrowers. Benchmark's distribution of HMDA-reportable loans reflects poorly on its efforts to meet the credit needs of borrowers of different income levels.

Table 13

Distribution of 2023 Home Mortgage Lending by Borrower Income Level Assessment Area: Dallas Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	2.8	0	0.0	1.1	20.1
Moderate	1	5.9	11.0	250	0.9	6.4	15.6
Middle	0	0.0	18.3	0	0.0	14.3	17.1
Upper	13	76.5	44.9	25,207	95.7	55.0	47.1
Unknown	3	17.6	23.0	889	3.4	23.1	0.0
Total	17	100.0	100.0	26,346	100.0	100.0	100.0
Source: 2023 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

The distribution of small business lending among businesses of different revenue sizes is reasonable. As shown in Table 14, 91.3 percent of businesses in the AA reported revenues of \$1 million or less (demographic figure), with Benchmark originating 40.0 percent and 31.4 percent of its small business loans to these businesses in 2023 and 2024, respectively. While this level of lending falls below the demographic figure, it is noteworthy that the demographic figure is not reflective of loan demand. Although Benchmark is not a CRA reporter, its performance aligns

with that of aggregate CRA reporters in the Dallas-Fort Worth area, who only originated approximately 50 percent of small business loans to businesses with revenues less than \$1 million, despite having more extensive resources than the bank. Benchmark did not report CRA small business loan data, and its performance is not directly compared to the performance of aggregate CRA reporters; however, this context provides insight into the bank's efforts and the market opportunities to originate small business loans.

Another way to consider small business lending is by dollar amount. Smaller businesses are more likely to benefit from small dollar loans. In this context, Benchmark originated 60.0 percent and 82.3 percent of small business loans in amounts of \$250,000 or less in 2023 and 2024, respectively. This reflects positively on the bank's willingness to meet the needs of small businesses that often rely on smaller dollar loans.

Table 14

Distribution of 2023 and 2024 Small Business Lending by Revenue Size of Businesses									
Assessment Area: Dallas Metropolitan									
	Bank Loans by Year								Total Businesses %
	2023				2024				
	#	#%	\$(000)	%	#	#%	\$(000)	%	
By Revenue									
\$1 Million or Less	2	40.0	565	55.4	16	31.4	2,722	41.3	91.3
Over \$1 Million	3	60.0	454	44.6	23	45.1	2,874	43.7	7.4
Revenue Unknown	0	0.0	0	0.0	12	23.5	988	15.0	1.3
Total	5	100.0	1,019	100.0	51	100.0	6,584	100.0	100.0
By Loan Size									
\$100,000 or Less	1	20.0	26	2.6	35	68.6	1,064	16.2	
\$100,001 - \$250,000	2	40.0	330	32.4	7	13.7	1,330	20.2	
\$250,001 - \$1 Million	2	40.0	663	65.1	9	17.6	4,190	63.6	
Total	5	100.0	1,019	100.0	51	100.0	6,584	100.0	
By Loan Size and Revenue \$1 Million or Less									
\$100,000 or Less	0	0.0	0	0.0	12	75.0	447	16.4	
\$100,001 - \$250,000	1	50.0	165	29.2	0	0.0	0	0.0	
\$250,001 - \$1 Million	1	50.0	400	70.8	4	25.0	2,275	83.6	
Total	2	100.0	565	100.0	16	100.0	2,722	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.									

Response to Complaints

Benchmark's record of responding to written comments about the bank's performance in helping to meet the credit needs in the Dallas Metropolitan AA is appropriate. During the review period, the bank received one comment letter from a member of the public regarding its performance in meeting the credit needs of its AA. The bank's action in investigating and responding to the allegations was appropriate.

COMMUNITY DEVELOPMENT TEST

Benchmark's CD performance demonstrates adequate responsiveness to the needs of the Dallas Metropolitan AA, considering the bank's capacity and the availability of such opportunities. Benchmark addressed CD needs through a combination of qualified loans, investments, and services that addressed affordable housing, small business, and essential community service needs. Each of these was identified as a need by community contacts. CD activities were generally concentrated in areas close to the bank's branches.

Benchmark employees cultivated relationships with nonprofit and community organizations to identify and strategically address credit needs. For example, the bank partnered with Habitat for Humanity to finance the construction of homes for families meeting income requirements that closely align with the LMI designations. As shown in Table 15, Benchmark originated \$12.9 million in CD loans to benefit affordable housing initiatives in the AA. Given that affordable housing was mentioned by community contacts as a need within the AA, these loans are considered especially responsive. Another notable example is a \$15.0 million construction loan in South Dallas for a rehabilitation facility in serving LMI areas with a special focus on treating drug and alcohol abuse.

In addition to CD lending, Benchmark extended \$307,000 in donations to various organizations in the AA whose mission or purpose aligned with the definition of CD under the CRA. Charitable contributions were directed to a variety of community services, including local schools, non-profit organizations, and housing programs that provide affordable homeownership opportunities to LMI households. These donations supported educational programs, housing stability, and essential community needs. Benchmark's efforts were particularly notable through approximately \$90,000 in donations and 41 hours of community service to support of a nonprofit organization dedicated to helping underserved students achieve college graduation and to advancing economic opportunities for LMI students.

Benchmark demonstrated a high level of employee engagement in CD services, providing 677 hours of qualified services in the AA. These activities included providing financial education to small business owners and technical assistance to non-profit organizations by serving on their boards of directors. Through these roles, bank employees provided their financial expertise to advance organizational goals and strengthen delivery of service in the AA.

Table 15

Community Development Activity Assessment Area: Dallas Metropolitan									
Community Development Purpose	Community Development Loans		Qualified Investments						Community Development Services
			Investments		Donations		Total Investments		
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#
Affordable Housing	21	12,935	0	0	0	0	0	0	10
Community Services	3	15,360	0	0	52	285	52	285	47
Economic Development	4	98	0	0	4	7	4	7	4
Revitalization and Stabilization	14	18,819	0	0	3	15	3	15	0
Totals	42	47,212	0	0	59	307	59	307	61
Note: Totals may not be exact due to rounding.									

METROPOLITAN ASSESSMENT AREAS
(Limited-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE AUSTIN METROPOLITAN ASSESSMENT AREA

- The Austin Metropolitan AA is comprised of Travis County, which is part of the Austin-Round Rock-San Marcos, TX Metropolitan Statistical Area (MSA). The remaining MSA counties, Bastrop, Caldwell, Hays, and Williamson, are not delineated in the AA. The AA delineation has remained unchanged since the prior performance evaluation. Refer to Appendix A for AA map and Appendix C for the AA lending tables.
- As of August 4, 2025, the bank operated three branches in the AA, representing 42.0 percent of its total branches.
- According to the FDIC's Deposit Market Share Report as of June 30, 2024, Benchmark held \$198.0 million in deposits in this AA, representing 20.0 percent of its total deposits and 0.4 percent of the deposit market share, ranking 24th of 60 FDIC-insured institutions in the AA.
- According to ACS data, the AA consists of 290 census tracts: 24 (8.3 percent) are low-income, 71 (24.5 percent) moderate-income, 79 (27.2 percent) middle-income, 100 (34.5 percent) upper-income, and 16 (5.5 percent) are census tracts with unknown income.
- The total population of the AA based on 2020 ACS data was 1,290,188, representing 4.4 percent of the state's population.
- The AA includes 280,144 families, of which 21.8 percent are low-, 16.5 percent are moderate-, 19.8 percent are middle-, and 41.9 percent are upper-income.
- Approximately 7.5 percent of AA families live below the poverty level.
- In 2023, 663 HMDA-reporting institutions originated or purchased 25,957 HMDA-reportable loans in the AA. The bank ranked 124th, after originating three HMDA-reportable loans, representing less than 0.1 percent of the total HMDA-reportable loans in this AA.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE HOUSTON METROPOLITAN ASSESSMENT AREA

- The Houston Metropolitan AA is comprised of contiguous census tracts in Harris County, which is part of the Houston-The Woodlands-Sugarland TX MSA. Other counties in the MSA but not delineated in the AA include Austin, Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, San Jacinto, and Waller counties. There have not been any changes to the AA delineation since the prior evaluation. Refer to Appendix A for AA map and Appendix C for the AA lending tables.
- As of August 4, 2025, the bank operates one branch in the AA, representing 14.0 percent of its total branches.
- According to the FDIC's Deposit Market Share Report as of June 30, 2024, Benchmark held \$41.6 million in deposits in this AA, representing 4.2 percent of its total deposits and a market share of less than 0.1 percent, ranking 72nd of 85 FDIC-insured institutions in the AA.
- According to ACS data, the AA consists of 812 census tracts: 155 (19.1 percent) low-income, 222 (27.3 percent) moderate-income, 194 (23.9 percent) middle-income, 214 (26.4 percent) upper-income, and 27 (3.3 percent) unknown census tracts.
- The total population of the AA based on 2020 ACS data was 4,731,145, representing 16.2 percent of the state's population.

- The AA includes 817,096 families, of which 14.5 percent are low-, 24.9 percent are moderate-, 28.7 percent are middle-, 30.3 percent are upper-income, and 1.6 percent do have reported income. Approximately 12.7 percent of AA families live below the poverty level.
- While 830 HMDA reporters originated or purchased 72,894 HMDA-reportable loans in the AA in 2023, Benchmark did not originate any such loans during that time.

Additional information regarding detailed demographic information and the HMDA-reportable and small business lending in the limited review AAs can be found in Appendix C.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LIMITED-SCOPE ASSESSMENT AREAS

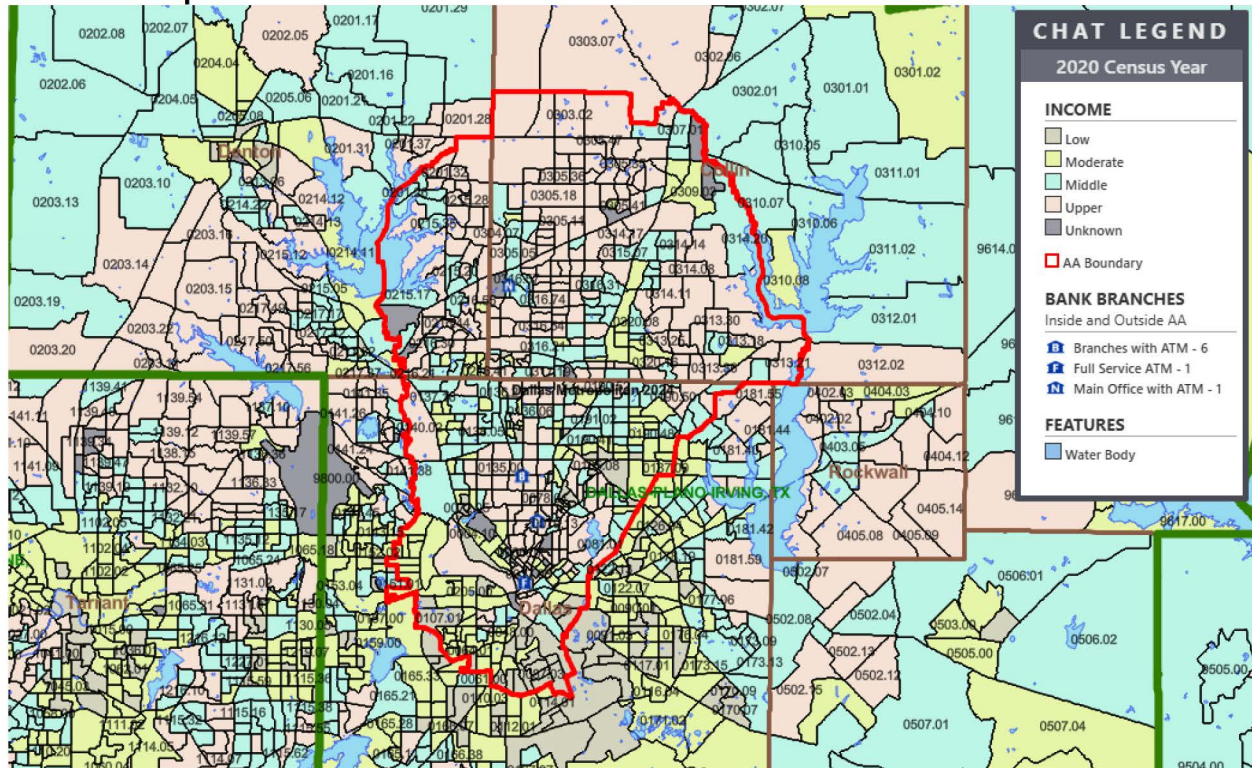
Conclusions regarding Benchmark's CRA performance are drawn from a review of available data, including performance figures, aggregate lending comparisons, and demographic information. The conclusions regarding Benchmark's performance in the limited-scope AAs do not change the overall performance rating for the bank.

Table 16

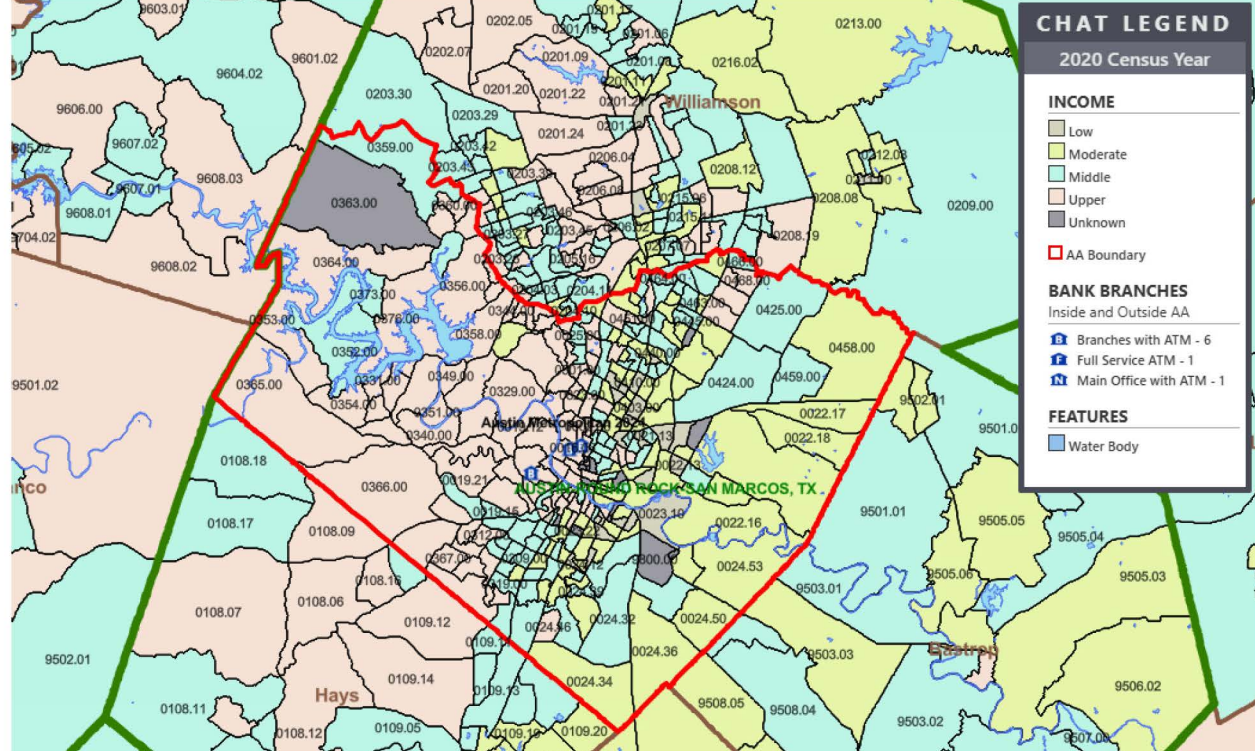
Conclusions with Respect to Performance Tests		
Assessment Area	Lending Test	Community Development Test
Austin Metropolitan	Consistent	Consistent
Houston Metropolitan	Below	Below

APPENDIX A – MAPS OF THE ASSESSMENT AREAS

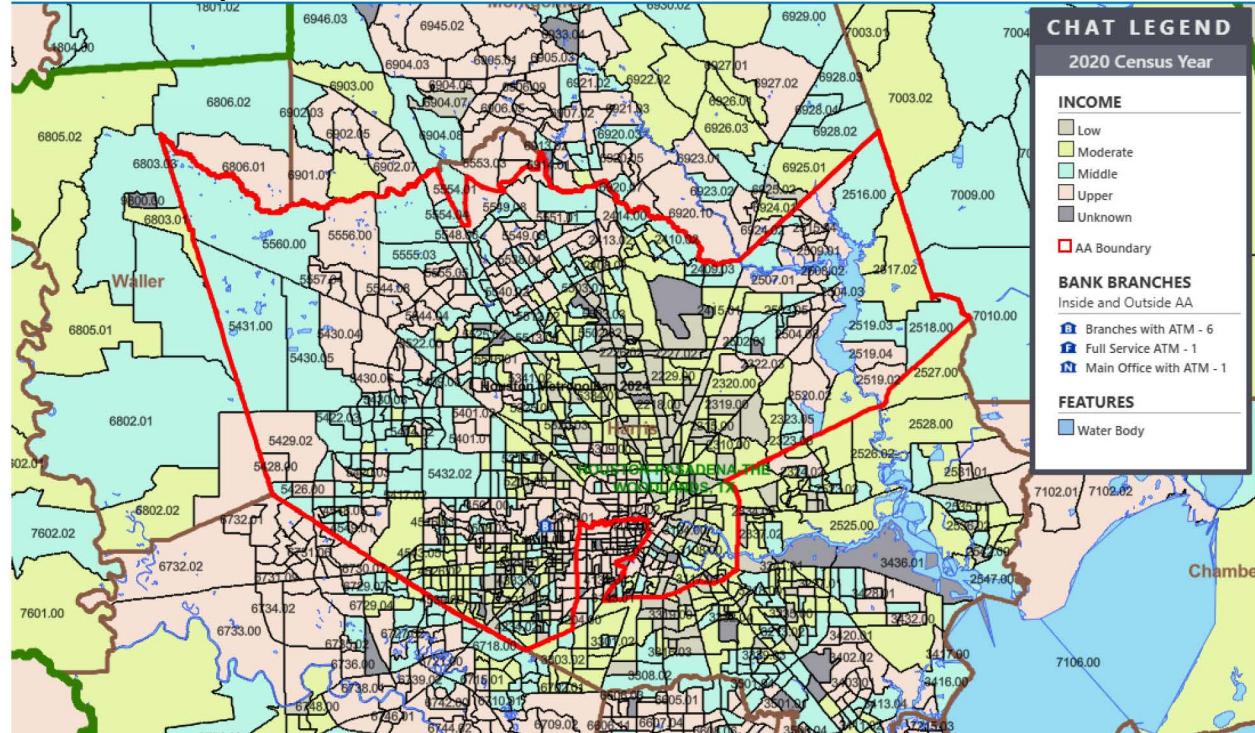
Dallas Metropolitan Assessment Area



Austin Metropolitan Assessment Area



Houston Metropolitan Assessment Area



APPENDIX B – DEMOGRAPHIC INFORMATION

Table B-1

2023 Combined Demographics Assessment Area: Dallas Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	54	9.1	46,609	7.9	11,498	24.7	119,259	20.1
Moderate	119	20.0	111,124	18.7	15,016	13.5	92,716	15.6
Middle	137	23.1	138,792	23.4	7,809	5.6	101,409	17.1
Upper	268	45.1	291,093	49.1	8,267	2.8	279,537	47.1
Unknown	16	2.7	5,303	0.9	968	18.3	0	0.0
Total AA	594	100.0	592,921	100.0	43,558	7.3	592,921	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	98,173	18,574	3.8	18.9	67,472	68.7	12,127	12.4
Moderate	199,030	68,601	14.0	34.5	113,114	56.8	17,315	8.7
Middle	251,684	112,965	23.0	44.9	119,953	47.7	18,766	7.5
Upper	441,475	287,690	58.6	65.2	125,061	28.3	28,724	6.5
Unknown	16,566	3,178	0.6	19.2	11,151	67.3	2,237	13.5
Total AA	1,006,928	491,008	100.0	48.8	436,751	43.4	79,169	7.9
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	8,365	4.9	7,471	4.8	828	6.6	66	3.0
Moderate	24,992	14.8	22,607	14.6	2,166	17.3	219	9.8
Middle	46,915	27.7	42,024	27.2	4,401	35.1	490	22.0
Upper	86,834	51.3	80,534	52.1	4,869	38.8	1,431	64.2
Unknown	2,287	1.4	1,986	1.3	278	2.2	23	1.0
Total AA	169,393	100.0	154,622	100.0	12,542	100.0	2,229	100.0
Percentage of Total Businesses:				91.3		7.4		1.3
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	26	2.5	26	2.5	0	0.0	0	0.0
Moderate	88	8.5	85	8.3	3	15.8	0	0.0
Middle	257	24.7	251	24.6	6	31.6	0	0.0
Upper	659	63.4	648	63.5	10	52.6	1	100.0
Unknown	10	1.0	10	1.0	0	0.0	0	0.0
Total AA	1,040	100.0	1,020	100.0	19	100.0	1	100.0
Percentage of Total Farms:				98.1		1.8		0.1
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

2024 Combined Demographics Assessment Area: Austin Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	24	8.3	19,369	6.9	4,920	25.4	61,099	21.8
Moderate	71	24.5	65,662	23.4	7,808	11.9	46,187	16.5
Middle	79	27.2	82,682	29.5	4,538	5.5	55,489	19.8
Upper	100	34.5	109,098	38.9	2,833	2.6	117,369	41.9
Unknown	16	5.5	3,333	1.2	868	26.0	0	0.0
Total AA	290	100.0	280,144	100.0	20,967	7.5	280,144	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	41,780	9,027	3.5	21.6	28,895	69.2	3,858	9.2
Moderate	128,416	51,113	19.6	39.8	69,417	54.1	7,886	6.1
Middle	158,994	81,671	31.4	51.4	65,874	41.4	11,449	7.2
Upper	188,951	116,616	44.8	61.7	58,501	31.0	13,834	7.3
Unknown	11,984	2,028	0.8	16.9	8,389	70.0	1,567	13.1
Total AA	530,125	260,455	100.0	49.1	231,076	43.6	38,594	7.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,720	3.8	2,473	3.7	220	4.9	27	2.5
Moderate	12,292	17.1	11,230	17.0	950	21.0	112	10.2
Middle	17,191	24.0	15,859	24.0	1,137	25.1	195	17.8
Upper	37,404	52.1	34,645	52.4	2,035	44.9	724	66.2
Unknown	2,145	3.0	1,922	2.9	187	4.1	36	3.3
Total AA	71,752	100.0	66,129	100.0	4,529	100.0	1,094	100.0
Percentage of Total Businesses:				92.2		6.3		1.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	20	3.1	19	2.9	1	20.0	0	0.0
Moderate	106	16.2	104	16.0	2	40.0	0	0.0
Middle	133	20.3	133	20.5	0	0.0	0	0.0
Upper	386	59.0	385	59.3	1	20.0	0	0.0
Unknown	9	1.4	8	1.2	1	20.0	0	0.0
Total AA	654	100.0	649	100.0	5	100.0	0	0.0
Percentage of Total Farms:				99.2		0.8		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 B-3

2023 Combined Demographics Assessment Area: Austin Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	24	8.3	19,369	6.9	4,920	25.4	61,099	21.8
Moderate	71	24.5	65,662	23.4	7,808	11.9	46,187	16.5
Middle	79	27.2	82,682	29.5	4,538	5.5	55,489	19.8
Upper	100	34.5	109,098	38.9	2,833	2.6	117,369	41.9
Unknown	16	5.5	3,333	1.2	868	26.0	0	0.0
Total AA	290	100.0	280,144	100.0	20,967	7.5	280,144	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	41,780	9,027	3.5	21.6	28,895	69.2	3,858	9.2
Moderate	128,416	51,113	19.6	39.8	69,417	54.1	7,886	6.1
Middle	158,994	81,671	31.4	51.4	65,874	41.4	11,449	7.2
Upper	188,951	116,616	44.8	61.7	58,501	31.0	13,834	7.3
Unknown	11,984	2,028	0.8	16.9	8,389	70.0	1,567	13.1
Total AA	530,125	260,455	100.0	49.1	231,076	43.6	38,594	7.3
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,997	3.8	2,725	3.7	244	4.8	28	2.4
Moderate	13,309	16.7	12,180	16.6	1,005	19.8	124	10.4
Middle	18,575	23.4	17,172	23.4	1,199	23.6	204	17.1
Upper	41,627	52.3	38,491	52.5	2,353	46.3	783	65.7
Unknown	3,027	3.8	2,697	3.7	278	5.5	52	4.4
Total AA	79,535	100.0	73,265	100.0	5,079	100.0	1,191	100.0
Percentage of Total Businesses:				92.1		6.4		1.5
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	23	3.3	22	3.2	1	20.0	0	0.0
Moderate	116	16.5	114	16.3	2	40.0	0	0.0
Middle	142	20.2	142	20.3	0	0.0	0	0.0
Upper	408	58.0	407	58.3	1	20.0	0	0.0
Unknown	14	2.0	13	1.9	1	20.0	0	0.0
Total AA	703	100.0	698	100.0	5	100.0	0	0.0
Percentage of Total Farms:				99.3		0.7		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.								

Table B-4

2024 Combined Demographics Assessment Area: Houston Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	155	19.1	118,696	14.5	39,297	33.1	223,458	27.3
Moderate	222	27.3	203,856	24.9	35,489	17.4	143,987	17.6
Middle	194	23.9	234,145	28.7	17,245	7.4	141,644	17.3
Upper	214	26.4	247,305	30.3	8,754	3.5	308,007	37.7
Unknown	27	3.3	13,094	1.6	3,370	25.7	0	0.0
Total AA	812	100.0	817,096	100.0	104,155	12.7	817,096	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	213,523	44,579	6.8	20.9	142,499	66.7	26,445	12.4
Moderate	333,929	139,271	21.3	41.7	163,646	49.0	31,012	9.3
Middle	354,424	204,058	31.2	57.6	124,944	35.3	25,422	7.2
Upper	378,657	258,654	39.6	68.3	92,040	24.3	27,963	7.4
Unknown	32,991	7,203	1.1	21.8	20,999	63.7	4,789	14.5
Total AA	1,313,524	653,765	100.0	49.8	544,128	41.4	115,631	8.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	19,982	12.1	17,960	11.9	1,905	14.7	117	6.6
Moderate	36,782	22.2	33,326	22.1	3,199	24.7	257	14.6
Middle	43,499	26.3	40,317	26.7	2,808	21.7	374	21.3
Upper	62,999	38.1	57,108	37.9	4,897	37.8	994	56.5
Unknown	2,224	1.3	2,069	1.4	137	1.1	18	1.0
Total AA	165,486	100.0	150,780	100.0	12,946	100.0	1,760	100.0
Percentage of Total Businesses:				91.1		7.8		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	51	5.8	50	5.8	1	5.0	0	0.0
Moderate	111	12.6	104	12.1	7	35.0	0	0.0
Middle	235	26.7	229	26.6	6	30.0	0	0.0
Upper	474	53.9	468	54.4	6	30.0	0	0.0
Unknown	9	1.0	9	1.0	0	0.0	0	0.0
Total AA	880	100.0	860	100.0	20	100.0	0	0.0
Percentage of Total Farms:				97.7		2.3		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 B-5

2023 Combined Demographics Assessment Area: Houston Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	167	20.6	128,753	15.8	41,733	32.4	226,015	27.7
Moderate	215	26.5	199,354	24.4	33,571	16.8	144,288	17.7
Middle	194	23.9	233,443	28.6	16,897	7.2	142,400	17.4
Upper	209	25.7	242,452	29.7	8,584	3.5	304,393	37.3
Unknown	27	3.3	13,094	1.6	3,370	25.7	0	0.0
Total AA	812	100.0	817,096	100.0	104,155	12.7	817,096	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	231,674	50,896	7.8	22.0	152,024	65.6	28,754	12.4
Moderate	324,491	137,033	21.0	42.2	158,130	48.7	29,328	9.0
Middle	352,569	204,774	31.3	58.1	122,735	34.8	25,060	7.1
Upper	371,799	253,859	38.8	68.3	90,240	24.3	27,700	7.5
Unknown	32,991	7,203	1.1	21.8	20,999	63.7	4,789	14.5
Total AA	1,313,524	653,765	100.0	49.8	544,128	41.4	115,631	8.8
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	24,382	13.2	21,900	13.0	2,344	16.4	138	7.1
Moderate	39,040	21.1	35,476	21.0	3,286	23.0	278	14.3
Middle	48,161	26.0	44,714	26.5	3,033	21.2	414	21.3
Upper	70,620	38.2	64,047	38.0	5,483	38.3	1,090	56.0
Unknown	2,783	1.5	2,588	1.5	168	1.2	27	1.4
Total AA	184,986	100.0	168,725	100.0	14,314	100.0	1,947	100.0
Percentage of Total Businesses:				91.2		7.7		1.1
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	57	6.0	54	5.9	3	15.0	0	0.0
Moderate	121	12.8	115	12.5	6	30.0	0	0.0
Middle	231	24.5	226	24.5	4	20.0	1	100.0
Upper	524	55.6	517	56.1	7	35.0	0	0.0
Unknown	10	1.1	10	1.1	0	0.0	0	0.0
Total AA	943	100.0	922	100.0	20	100.0	1	100.0
Percentage of Total Farms:				97.8		2.1		0.1
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 – LIMITED-SCOPE REVIEW ASSESSMENT AREAS’ LENDING TABLES

Table C-1

Distribution of 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: Austin Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	3.2	0	0.0	3.0	3.5
Moderate	0	0.0	26.1	0	0.0	20.5	19.6
Middle	1	33.3	32.9	1,264	28.5	26.1	31.4
Upper	1	33.3	36.5	1,375	31.0	48.7	44.8
Unknown	1	33.3	1.3	1,791	40.4	1.6	0.8
Total	3	100.0	100.0	4,430	100.0	100.0	100.0
Source: 2023 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-2

Distribution of 2024 Small Business Lending by Income Level of Geography Assessment Area: Austin Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses (%)
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	3.8
Moderate	1	33.3	11	2.7	17.1
Middle	0	0.0	0	0.0	24.0
Upper	2	66.7	400	97.3	52.1
Unknown	0	0.0	0	0.0	3.0
Total	3	100.0	411	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-3

Distribution of 2023 Small Business Lending by Income Level of Geography Assessment Area: Austin Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses (%)
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	3.8
Moderate	0	0.0	0	0.0	16.7
Middle	0	0.0	0	0.0	23.4
Upper	0	0.0	0	0.0	52.3
Unknown	0	0.0	0	0.0	3.8
Total	0	0.0	0	0.0	100.0
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-4

Distribution of 2023 Home Mortgage Lending by Borrower Income Level Assessment Area: Austin Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	3.6	0	0.0	1.3	21.8
Moderate	0	0.0	11.1	0	0.0	6.1	16.5
Middle	0	0.0	18.4	0	0.0	13.3	19.8
Upper	2	66.7	44.5	2,639	59.6	55.8	41.9
Unknown	1	33.3	22.4	1,791	40.4	23.6	0.0
Total	3	100.0	100.0	4,430	100.0	100.0	100.0
Source: 2023 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-5

Distribution of 2024 Small Business Lending by Revenue Size of Businesses					
Assessment Area: Austin Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	0	0.0	0	0.0	92.2
Over \$1 Million	3	100.0	411	100.0	6.3
Revenue Unknown	0	0.0	0	0.0	1.5
Total	3	100.0	411	100.0	100.0
By Loan Size					
\$100,000 or Less	1	33.3	11	2.7	
\$100,001 - \$250,000	2	66.7	400	97.3	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	3	100.0	411	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	0	0.0	0	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-6

Distribution of 2023 Small Business Lending by Revenue Size of Businesses					
Assessment Area: Austin Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	0	0.0	0	0.0	92.1
Over \$1 Million	0	0.0	0	0.0	6.4
Revenue Unknown	0	0.0	0	0.0	1.5
Total	0	0.0	0	0.0	100.0
By Loan Size					
\$100,000 or Less	0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	0	0.0	0	0.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	0	0.0	0	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-7

Distribution of 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: Austin Metropolitan							
Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	3.2	0	0.0	3.0	3.5
Moderate	0	0.0	26.1	0	0.0	20.5	19.6
Middle	1	33.3	32.9	1,264	28.5	26.1	31.4
Upper	1	33.3	36.5	1,375	31.0	48.7	44.8
Unknown	1	33.3	1.3	1,791	40.4	1.6	0.8
Total	3	100.0	100.0	4,430	100.0	100.0	100.0

Source: 2023 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-8

Distribution of 2024 Small Business Lending by Income Level of Geography Assessment Area: Austin Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses (%)
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	3.8
Moderate	1	33.3	11	2.7	17.1
Middle	0	0.0	0	0.0	24.0
Upper	2	66.7	400	97.3	52.1
Unknown	0	0.0	0	0.0	3.0
Total	3	100.0	411	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-9

Distribution of 2023 Small Business Lending by Income Level of Geography Assessment Area: Austin Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses (%)
	#	#%	\$(000)	\$%	
Low	0	0.0	0	0.0	3.8
Moderate	0	0.0	0	0.0	16.7
Middle	0	0.0	0	0.0	23.4
Upper	0	0.0	0	0.0	52.3
Unknown	0	0.0	0	0.0	3.8
Total	0	0.0	0	0.0	100.0

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-10

Distribution of 2024 Small Business Lending by Revenue Size of Businesses					
Assessment Area: Austin Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	0	0.0	0	0.0	92.2
Over \$1 Million	3	100.0	411	100.0	6.3
Revenue Unknown	0	0.0	0	0.0	1.5
Total	3	100.0	411	100.0	100.0
By Loan Size					
\$100,000 or Less	1	33.3	11	2.7	
\$100,001 - \$250,000	2	66.7	400	97.3	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	3	100.0	411	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	0	0.0	0	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-11

Distribution of 2023 Small Business Lending by Revenue Size of Businesses					
Assessment Area: Austin Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	\$%	
By Revenue					
\$1 Million or Less	0	0.0	0	0.0	92.1
Over \$1 Million	0	0.0	0	0.0	6.4
Revenue Unknown	0	0.0	0	0.0	1.5
Total	0	0.0	0	0.0	100.0
By Loan Size					
\$100,000 or Less	0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	0	0.0	0	0.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	0	0.0	0	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-12 (1 of 2)

Distribution of 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: Houston Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	7.8
Moderate	0	0.0	0.0	0	0.0	0.0	21.0
Middle	0	0.0	0.0	0	0.0	0.0	31.3
Upper	0	0.0	0.0	0	0.0	0.0	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	1.1
Total	0	0.0	0.0	0	0.0	0.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	7.8
Moderate	0	0.0	0.0	0	0.0	0.0	21.0
Middle	0	0.0	0.0	0	0.0	0.0	31.3
Upper	0	0.0	0.0	0	0.0	0.0	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	1.1
Total	0	0.0	0.0	0	0.0	0.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	7.8
Moderate	0	0.0	0.0	0	0.0	0.0	21.0
Middle	0	0.0	0.0	0	0.0	0.0	31.3
Upper	0	0.0	0.0	0	0.0	0.0	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	1.1
Total	0	0.0	0.0	0	0.0	0.0	100.0
	Multifamily Loans						Multi- family Units %
Low	0	0.0	0.0	0	0.0	0.0	30.7
Moderate	0	0.0	0.0	0	0.0	0.0	26.3
Middle	0	0.0	0.0	0	0.0	0.0	19.4
Upper	0	0.0	0.0	0	0.0	0.0	18.8
Unknown	0	0.0	0.0	0	0.0	0.0	4.7
Total	0	0.0	0.0	0	0.0	0.0	100.0
	Total Home Mortgage Loans						Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	7.8
Moderate	0	0.0	0.0	0	0.0	0.0	21.0
Middle	0	0.0	0.0	0	0.0	0.0	31.3
Upper	0	0.0	0.0	0	0.0	0.0	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	1.1
Total	0	0.0	0.0	0	0.0	0.0	100.0
Source: 2023 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-12 (2 of 2)

Distribution of 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: Houston Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	7.8
Moderate	0	0.0	0.0	0	0.0	0.0	21.0
Middle	0	0.0	0.0	0	0.0	0.0	31.3
Upper	0	0.0	0.0	0	0.0	0.0	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	1.1
Total	0	0.0	0.0	0	0.0	0.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	7.8
Moderate	0	0.0	0.0	0	0.0	0.0	21.0
Middle	0	0.0	0.0	0	0.0	0.0	31.3
Upper	0	0.0	0.0	0	0.0	0.0	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	1.1
Total	0	0.0	0.0	0	0.0	0.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	7.8
Moderate	0	0.0	0.0	0	0.0	0.0	21.0
Middle	0	0.0	0.0	0	0.0	0.0	31.3
Upper	0	0.0	0.0	0	0.0	0.0	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	1.1
Total	0	0.0	0.0	0	0.0	0.0	100.0
Source: 2023 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-13

Distribution of 2024 Small Business Lending by Income Level of Geography Assessment Area: Houston Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses (%)
	#	#%	\$(000)	%	
Low	1	25.0	3	0.2	12.1
Moderate	0	0.0	0	0.0	22.2
Middle	1	25.0	250	19.2	26.3
Upper	2	50.0	1,049	80.6	38.1
Unknown	0	0.0	0	0.0	1.3
Total	4	100.0	1,301	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-14

Distribution of 2023 Small Business Lending by Income Level of Geography Assessment Area: Houston Metropolitan					
Geographic Income Level	Bank Loans				Total Businesses (%)
	#	#%	\$(000)	%	
Low	0	0.0	0	0.0	13.2
Moderate	0	0.0	0	0.0	21.1
Middle	0	0.0	0	0.0	26.0
Upper	0	0.0	0	0.0	38.2
Unknown	0	0.0	0	0.0	1.5
Total	0	0.0	0	0.0	100.0
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-15 (1 of 2)

Distribution of 2023 Home Mortgage Lending by Borrower Income Level Assessment Area: Houston Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.0	0	0.0	0.0	27.7
Moderate	0	0.0	0.0	0	0.0	0.0	17.7
Middle	0	0.0	0.0	0	0.0	0.0	17.4
Upper	0	0.0	0.0	0	0.0	0.0	37.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	0.0	0	0.0	0.0	100.0
Refinance Loans							
Low	0	0.0	0.0	0	0.0	0.0	27.7
Moderate	0	0.0	0.0	0	0.0	0.0	17.7
Middle	0	0.0	0.0	0	0.0	0.0	17.4
Upper	0	0.0	0.0	0	0.0	0.0	37.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	0.0	0	0.0	0.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	27.7
Moderate	0	0.0	0.0	0	0.0	0.0	17.7
Middle	0	0.0	0.0	0	0.0	0.0	17.4
Upper	0	0.0	0.0	0	0.0	0.0	37.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	0.0	0	0.0	0.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	0.0	0	0.0	0.0	27.7
Moderate	0	0.0	0.0	0	0.0	0.0	17.7
Middle	0	0.0	0.0	0	0.0	0.0	17.4
Upper	0	0.0	0.0	0	0.0	0.0	37.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	0.0	0	0.0	0.0	100.0
Source: 2023 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-15 (2 of 2)

Distribution of 2023 Home Mortgage Lending by Borrower Income Level							
Assessment Area: Houston Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Other Purpose LOC							
Low	0	0.0	0.0	0	0.0	0.0	27.7
Moderate	0	0.0	0.0	0	0.0	0.0	17.7
Middle	0	0.0	0.0	0	0.0	0.0	17.4
Upper	0	0.0	0.0	0	0.0	0.0	37.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	0.0	0	0.0	0.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	0.0	0	0.0	0.0	27.7
Moderate	0	0.0	0.0	0	0.0	0.0	17.7
Middle	0	0.0	0.0	0	0.0	0.0	17.4
Upper	0	0.0	0.0	0	0.0	0.0	37.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	0.0	0	0.0	0.0	100.0
Purpose Not Applicable							
Low	0	0.0	0.0	0	0.0	0.0	27.7
Moderate	0	0.0	0.0	0	0.0	0.0	17.7
Middle	0	0.0	0.0	0	0.0	0.0	17.4
Upper	0	0.0	0.0	0	0.0	0.0	37.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	0.0	0	0.0	0.0	100.0
Source: 2023 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-16

Distribution of 2024 Small Business Lending by Revenue Size of Businesses					
Assessment Area: Houston Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	2	50.0	51	3.9	91.1
Over \$1 Million	2	50.0	1,250	96.1	7.8
Revenue Unknown	0	0.0	0	0.0	1.1
Total	4	100.0	1,301	100.0	100.0
By Loan Size					
\$100,000 or Less	2	50.0	51	3.9	
\$100,001 - \$250,000	1	25.0	250	19.2	
\$250,001 - \$1 Million	1	25.0	1,000	76.9	
Total	4	100.0	1,301	100.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	2	100.0	51	100.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	2	100.0	51	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-17

Distribution of 2023 Small Business Lending by Revenue Size of Businesses					
Assessment Area: Houston Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	\$(000)	%	
By Revenue					
\$1 Million or Less	0	0.0	0	0.0	91.2
Over \$1 Million	0	0.0	0	0.0	7.7
Revenue Unknown	0	0.0	0	0.0	1.1
Total	0	0.0	0	0.0	100.0
By Loan Size					
\$100,000 or Less	0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	0	0.0	0	0.0	
By Loan Size and Revenue \$1 Million or Less					
\$100,000 or Less	0	0.0	0	0.0	
\$100,001 - \$250,000	0	0.0	0	0.0	
\$250,001 - \$1 Million	0	0.0	0	0.0	
Total	0	0.0	0	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 D – 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 subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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, 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 nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full-scope review: Performance is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and 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 refinancings 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.

Limited-scope review: Performance is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

Market share: The number of loans originated and purchased by the 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.

Nonmetropolitan area (NonMSA): Any area that is not located within an MSA.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. 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. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

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) 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 Consolidated Reports of Condition and Income (Call Report) instructions. 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 more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.