

# **PUBLIC DISCLOSURE**

August 1, 2022

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Vantage Bank Texas  
RSSD #26765  
45 NE Loop 410, Suite 400  
San Antonio, Texas 78216

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**

**Institution’s Community Reinvestment Act Rating: Vantage Bank Texas is rated Satisfactory.**

The following table indicates the Community Reinvestment Act (CRA) performance level of Vantage Bank Texas (Vantage or the bank) with respect to the Lending, Investment, and Service Tests.

Performance Levels	Vantage Bank Texas Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	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 Vantage’s rating include:

- Lending activity reflects good responsiveness to the credit needs of the banks’ assessment areas (AAs).
- A substantial majority of loans are made in the bank’s AAs.
- The geographic distribution of loans reflects adequate penetration throughout the AAs.
- The distribution of the bank’s residential real estate lending, also referred as Home Mortgage Disclosure Act (HMDA), lending reflects adequate penetration among customers of different income levels.
- The distribution of small business lending reflects good penetration among businesses of different revenue sizes.
- Vantage makes a relatively high level community development loans.
- The bank makes use of innovative and/or flexible lending practices in serving AAs’ needs.
- Vantage has an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors: however, the bank is rarely in a leadership position.
- Delivery systems are accessible to individuals of different income levels throughout the bank’s AAs, which have not been adversely affected by the bank’s opening and closing of branches
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income (LMI) geographies and/or LMI individuals.
- The bank’s services do not vary in a way that inconveniences the AAs, particularly LMI geographies and/or LMI individuals.
- Vantage provides a limited level of community development services.

## INSTITUTION

### Description of the Institution

Vantage, a financial institution headquartered in San Antonio, Texas, has the following characteristics:

- As of March 31, 2022, the bank reported total assets of approximately \$3.3 billion and gross loans of \$2.5 billion.
- VBT Financial Corporation, headquartered in San Antonio, Texas, wholly owns the bank.
- In November 2018, Vantage acquired and merged Inter National Bank, expanding the bank's geographic footprint into Tarrant County, which is part of the Dallas-Fort Worth-Arlington, TX Metropolitan Statistical Area (MSA).
- Currently, the bank operates 23 branch offices and 27 deposit-taking automated teller machines (ATMs) throughout its AAs, closing four branch locations since the previous CRA evaluation.
- The bank offers traditional deposit and loan products to meet the needs of the communities it serves.
- Vantage is predominately a commercial lender, with commercial loans representing a majority of the bank's loan portfolio (85.0 percent) as of March 31, 2022.
  - Commercial loans are made for a variety of business purposes, including financing for interim construction of industrial and commercial properties; financing for equipment, inventories, and accounts receivable; and acquisition financing.
  - Residential real estate loans comprise a smaller but material portion of the total loan portfolio, representing 12.0 percent of the bank's loan portfolio.

The table below reflects Vantage's loan portfolio composition as of March 31, 2022.

**Table 1**

<b>Composition of Loan Portfolio as of March 31, 2022</b>		
<b>Loan Type</b>	<b>\$(000)</b>	<b>%</b>
Construction and Land Development	512,425	20.5
Farmland	45,628	1.8
1-4 Family Residential Real Estate	229,071	9.2
Multifamily Residential Real Estate	70,668	2.8
Non-Farm Non-Residential Real Estate	1,108,173	44.4
Agricultural	3,322	0.1
Commercial and Industrial	501,036	20.1
Consumer	7,211	0.3
Other	18,640	0.7
<b>Gross Loans</b>	<b>2,496,174</b>	<b>100.0</b>
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>		

The Federal Reserve Bank of Dallas rated the bank's CRA performance as **Satisfactory** at the previous performance evaluation dated May 6, 2019. The bank received a **Satisfactory** rating under the Lending Test and a **Satisfactory** rating under the Community Development Test.

The bank's ability to meet various credit needs of the communities it serves has not been hampered by Vantage's capacity to lend, financial condition and size, product offerings, prior performance, legal impediments, or other factors.

### Scope of the Evaluation

The bank's CRA performance was evaluated using the Interagency Examination Procedures for Large Retail Institutions, developed by the Federal Financial Institutions Examination Council (FFIEC). Examiners evaluated the bank's CRA performance through the Lending, Investment, and Service Tests, considering all of Vantage's AAs. Full-scope reviews were conducted for three of the bank's seven delineated AAs. Factors to determine which AAs would receive full-scope reviews include, but are not limited to:

- the level of the bank's lending, investment, and service activities as well as the availability of opportunities in AAs;
- comments received from community groups and the public regarding the institution's CRA performance;
- population density;
- the number of other institutions in the AAs; and
- the length of time since the most recent full-scope review.

Overall, approximately 76.4 percent of Vantages' total lending activity (by number of loans), 87.0 percent of total deposits, and 70.0 percent of total branches were evaluated through the full-scope reviews performed.

The following table depicts Vantage's AAs and the scope of the review received.

**Table 2**

<b>Assessment Areas</b>	<b>Scope of Review Received</b>
San Antonio Metropolitan	Full-Scope
McAllen MSA	Full-Scope
El Paso Metropolitan	Full-Scope
Brownsville MSA	Limited-Scope
Fort Worth Metropolitan	Limited-Scope
Laredo MSA	Limited-Scope
Refugio Nonmetropolitan	Limited-Scope

This evaluation consists of a review of the bank's 2019, 2020, and 2021 HMDA and CRA reported small business lending data, as well as the community development loans, investments, and services extended from May 7, 2019 through August 1, 2022, including the prior period's community development investments. The bank's volume of small business lending is greater than the volume of HMDA lending; therefore, small business lending carried a heavier weight when assessing the bank's CRA performance.

## 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 the 2011-2015 U.S. Census and 2021 Dun & Bradstreet (D&B) data. 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. The information was used to understand the bank's performance context.

In conjunction with the evaluation, examiners interviewed community leaders serving the bank's AAs receiving a full-scope review, and leveraged interviews previously conducted in conjunction with CRA evaluations performed for other financial institutions serving in the same AAs. Community contacts included representatives of community-based organizations, municipalities, and quasi-government agencies that extend housing and small business-related loans and services within the bank's delineated AAs.

## Conclusions With Respect to Performance Tests

### Lending Test

The bank's lending performance is **Low Satisfactory**. Lending activity reflects good responsiveness to AAs' credit needs. The geographic distribution of loans reflects adequate geographic dispersion and adequate distribution among borrowers of different income levels and businesses of different revenue sizes. Vantage makes a relatively high level of community development loans.

### *Lending Activity*

Vantage originated significantly more small business loans than HMDA-reportable loans from January 1, 2019 through December 31, 2021. As a result, small business lending had greater impact on lending ratings. Within the analysis of HMDA-reportable lending, each loan product (home purchase, home refinance, home improvement, and multifamily lending) were also weighted by relative volume within each AA. The bank's lending levels reflect good responsiveness to the credit needs in all delineated AAs and were generally commensurate with deposits in each AA. No conspicuous gaps in lending activity by income category were identified. Detailed information about lending activity can be found in each of the AA sections of this report.

### *Lending Inside and Outside of the Assessment Areas*

This performance criterion evaluates the volume and percentage of HMDA and CRA loans extended inside and outside of the bank's delineated AAs. As depicted in the table below, Vantage extends a substantial majority of its loans, by number and dollar, within its seven AAs.

**Table 3**

Assessment Area Concentration								
Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	2	100	\$182	100	0	0	\$0	0
Home Purchase - Conventional	381	76.5	\$115,312	64.7	117	23.5	\$62,800	35.3
Home Purchase - FHA	4	80	\$729	87.3	1	20	\$106	12.7
Multi-Family Housing	16	88.9	\$19,962	83.1	2	11.1	\$4,050	16.9
Other Purpose Closed-End	25	78.1	\$4,312	55.9	7	21.9	\$3,408	44.1
Refinancing	161	87.5	\$40,168	78.5	23	12.5	\$11,023	21.5
<b>Total HMDA</b>	<b>589</b>	<b>79.7</b>	<b>\$180,665</b>	<b>68.9</b>	<b>150</b>	<b>20.3</b>	<b>\$81,387</b>	<b>31.1</b>
<b>Total Small Business</b>	<b>2,359</b>	<b>87.9</b>	<b>\$475,448</b>	<b>84.9</b>	<b>326</b>	<b>12.1</b>	<b>\$84,494</b>	<b>15.1</b>
<b>Total Small Farm</b>	<b>10</b>	<b>55.6</b>	<b>\$1,098</b>	<b>37.2</b>	<b>8</b>	<b>44.4</b>	<b>\$1,852</b>	<b>62.8</b>
<b>TOTAL LOANS</b>	<b>2,958</b>	<b>85.9</b>	<b>\$657,211</b>	<b>79.7</b>	<b>484</b>	<b>14.1</b>	<b>\$167,733</b>	<b>20.3</b>

***Geographic Distribution and Distribution by Borrower Income and Business Revenue Size***

The geographic lending distribution considers the number and amount of bank loans extended in low-, moderate-, middle-, and upper-income geographies within Vantage’s AAs. The geographic distribution of loans reflects good penetration throughout the AAs.

The borrower lending distribution considers the number of HMDA loans extended to low-, moderate-, middle-, and upper-income individuals and small business loans extended to businesses of different revenue sizes. The bank’s borrower lending distribution reflects good penetration among individuals of different income levels and businesses of revenue different 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***

The bank makes a relatively high level of community development loans, taking into account both the number and dollar volume of qualified activity. Community development loans originated during the evaluation period were extended for a variety of purposes, as noted in the table below. Moreover, Vantage’s volume of community development lending includes a large number of qualified loans originated in participation with the Small Business Administration’s (SBA) Paycheck Protection Program (PPP), a program specifically designed to meet the needs of businesses in the United States struggling during the COVID-19 pandemic. The bank’s participation in the SBA PPP reflects favorably on Vantage’s responsiveness to the credit needs of the delineated AAs. Specific details regarding the community development lending can be found in the Conclusions with Respect to Performance Tests section for each AA.

**Table 4**

Community Development Lending Assessment Area: All		
Purpose	Number	\$(000s)
Economic Development	4	20,664
Revitalization and Stabilization	43	118,577
<b>Total</b>	<b>47</b>	<b>139,241</b>

**Investment Test**

The bank’s overall Investment Test rating is **Low Satisfactory**. The bank has an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors. The volume and amount of such investments and grants rarely positions the bank as a leader. Specific details regarding investments, grants, and donations can be found in the Conclusions with Respect to Performance Tests section for each AA.

**Table 5**

Investments, Grants, and Donations Assessment Area: All								
Community Development Purpose	Current Investments <sup>1</sup>		Prior Period Investments <sup>2</sup>		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	1	1,593	2	3,548	1	1	4	5,142
Community Services	0	0	0	0	41	136	41	136
Economic Development	0	0	0	0	4	12	4	12
Revitalization and Stabilization	11	7,042	1	3,408	0	0	12	10,450
<b>Total</b>	<b>12</b>	<b>8,635</b>	<b>3</b>	<b>6,956</b>	<b>46</b>	<b>149</b>	<b>61</b>	<b>15,740</b>

<sup>1</sup> Original Market Value of Investment  
<sup>2</sup> Book Value of Investment

**Service Test**

The bank’s overall Service Test rating is **Low Satisfactory**.

**Retail Services**

The bank’s Service Test performance is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the AA. The bank’s delivery systems are accessible to the bank’s geographies and individuals of different income levels in its AA. The bank’s record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations do not vary in a way that inconveniences the delineated AAs, particularly in LMI geographies or to LMI individuals.



**Table 6**

Branch and Full-Service ATM Locations Assessment Area: All							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full-service ATMs	
				#	%	#	%
Low	8.1	6.2	5.1	1	4.3	1	4.0
Moderate	32.6	29.3	23.0	4	17.4	5	20.0
Middle	30.6	32.8	29.0	8	34.8	7	28.0
Upper	27.6	31.6	42.7	10	43.5	12	48.0
Unknown	1.1	0.1	0.2	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>23</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>

**Community Development Services**

The bank provides a limited level of community development services in the bank’s AAs. The majority of services provided focused on community services targeted to LMI individuals. The bank’s performance reflects a decrease in community development services since the previous examination. This is partially attributable to the COVID-19 pandemic, which severely limited the opportunity for banks to provide in-person services due to quarantine and social distancing measures. However, the limited number of services provided adversely impacts the bank’s community development service performance. The table below demonstrates the services provided during the review period.

**Table 7**

Community Development Services Assessment Area: All		
Purpose	Total Services	Total Organizations
Community Services	17	14
Revitalization and Stabilization	1	1
<b>Total</b>	<b>18</b>	<b>15</b>

**Fair Lending or Other Illegal Credit Practices Review**

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified. The bank is in compliance with the substantive provisions of the anti-discrimination laws and regulations. Established policies and procedures are designed to ensure ongoing compliance with applicable laws and regulations.

**METROPOLITAN AREAS  
(Full-Scope Review)**

**Description of the Institution’s Operations in the San Antonio Metropolitan Assessment Area**

The bank’s San Antonio Metropolitan AA consists of a portion of the San Antonio-New Braunfels, Texas MSA including the entirety of Bexar County and Medina County. The remainder of the MSA, including the counties of Atascosa, Bandera, Comal, Guadalupe, Kendall, and Wilson, are excluded from the bank’s San Antonio Metropolitan AA. (See Appendix A for an AA map and Appendix B for additional demographic data).

- The San Antonio Metropolitan AA contains 374 census tracts, 8.8 percent of which are classified as low-income tracts and 35.3 percent are moderate-income. No material changes have been made in the makeup of the AA since the previous examination.
- As of June 30, 2021, 47 financial institutions held approximately \$161.3 billion in deposits in the San Antonio Metropolitan AA. Vantage ranks 16<sup>th</sup>, with \$392 million in deposits, constituting a market share of 0.2 percent.
- In 2021, 755 financial institutions reported 96,256 HMDA-reportable loan originations or purchases in the San Antonio Metropolitan AA. Only 0.1 percent of reported loans were originated by Vantage, ranked 139<sup>th</sup>. Additionally, of the 215 institutions that reported CRA small business and small farm loan data in the AA in 2021, Vantage ranked 25<sup>th</sup>, originating approximately 0.4 percent of the reported loans.
- According to interviews with community leaders, representatives of organizations that promote economic development and assist LMI individuals and families with their housing needs, the credit needs of the AA include mortgage assistance programs and financial education for families that are struggling to maintain payments. Moreover, the community leaders indicated continued work with community development financial institutions (CDFIs) is crucial, as many small business owners rely on these organizations for technical assistance and to secure microloans.

**Table 8**

<b>Population Change Assessment Area: San Antonio Metropolitan</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
San Antonio Metropolitan	1,760,779	1,872,894	6.4
Bexar County, Texas	1,714,773	1,825,502	6.5
Medina County, Texas	46,006	47,392	3.0
San Antonio-New Braunfels, Texas MSA	2,142,508	2,286,702	6.7
Texas	25,145,561	26,538,614	5.5

*Source: 2010 U.S. Census Bureau Decennial Census  
2011 - 2015 U.S. Census Bureau American Community Survey*

- The bank’s San Antonio Metropolitan AA has experienced significant, sustained growth since 2010. According to 2020 U.S. Decennial Census data, the San Antonio-New Braunfels, Texas MSA grew more than 19 percent between 2010 and 2020.
- Bexar County, where approximately 97.5 percent of the AA’s population resides, had the sixth largest population growth in the nation between 2010 and 2019.

**Table 9**  
**Median Family Income Change**  
**Assessment Area: San Antonio Metropolitan**

Area	2010 Median Family Income	2015 Median Family Income	Percent Change
San Antonio Metropolitan	\$60,825	\$59,577	-2.1
Bexar County, Texas	\$60,671	\$59,348	-2.2
Medina County, Texas	\$61,918	\$66,652	7.6
San Antonio-New Braunfels, Texas MSA	\$63,401	\$62,228	-1.9
Texas	\$63,314	\$62,717	-0.9

*Source: 2006 - 2010 U.S. Census Bureau American Community Survey  
2011 - 2015 U.S. Census Bureau American Community Survey  
Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.*

- Approximately 13.7 percent of the total families domiciled within the San Antonio Metropolitan AA report family income levels below the poverty level, which is comparable to the statewide poverty level of 13.5 percent.
- According to 2015 ACS Data, 41.6 percent of families in the AA were LMI, which is slightly above the statewide rate of 40.0 percent.
- The AA median family income (MFI) is slightly below the median family income for the within the San Antonio-New Braunfels, Texas MSA and the state of Texas. Moreover, the AA as a whole has seen a slight decline in the MFI since 2010; however, Medina County’s MFI has seen a modest increase of 7.6 percent.

**Table 10**  
**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	77.4	55.0	44.1	60.2	36.7	20.3
Bexar County, Texas	77.7	55.4	44.3	60.6	37.4	20.4
Medina County, Texas	55.7	21.1	24.6	52.6	15.6	16.2
San Antonio-New Braunfels, Texas MSA	77.0	54.3	43.1	59.9	35.5	19.6
Texas	78.1	51.1	42.5	60.1	34.8	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), 2014-2018 Comprehensive Housing Affordability Strategy*

- The housing affordability ratio<sup>1</sup> in the San Antonio Metropolitan AA, at 39.7 percent, is comparable to the statewide ratio of 39.1 percent. Housing affordability ratios varied between the AA counties, with housing in Medina County being more affordable than Bexar County’s homes, as noted by their respective affordability ratios of 45.8 percent and 39.5 percent.
- The cost burden for renters and owners alike indicates that the most affordable housing options for LMI individuals are in Medina County.
- Overall, the cost burden for homeowners in the AA is comparable to the statewide averages.

<sup>1</sup> The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.



**Table 11**

<b>Unemployment Rates</b>					
<b>Assessment Area: San Antonio Metropolitan</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
San Antonio Metropolitan	3.6	3.4	3.2	7.6	5.3
Bexar County, Texas	3.6	3.4	3.2	7.6	5.4
Medina County, Texas	3.9	3.5	3.2	6.3	5.0
San Antonio-New Braunfels, Texas MSA	3.6	3.3	3.1	7.3	5.2
Texas	4.3	3.9	3.5	7.7	5.7
<i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i>					

- The AA’s unemployment rates throughout the review period has mirrored the unemployment rates of the MSA and has steadily remained below the statewide unemployment rates. Furthermore, the changes in the AA’s unemployment rates have following similar patterns to the state of Texas, which were heavily impacted by the COVID-19 pandemic in 2020. While unemployment rates improved in 2021, they continue to exceed the pre-pandemic unemployment rates.
- According to the Bureau of Economic Analysis, the San Antonio-New Braunfels, TX MSA had the fourth largest economy of any Texan metropolitan area in 2020, with a current dollar gross domestic product of approximately \$132.1 billion.
- The San Antonio Metropolitan AA has a large military presence, with three bases throughout the area. The AA’s private sector specializes in real estate, rental and leasing, as well as manufacturing, professional, and educational services.
- Major employers in the San Antonio Metropolitan AA include Joint Base San Antonio (military), H-E-B (grocery), United Services Automobile Association (financial services), and United Methodist Healthcare System (health care).

The following table details selected characteristics of the AA.

**Table 12**

2021 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	33	8.8	28,586	6.6	10,764	37.7	103,436	24.0
Moderate	132	35.3	135,552	31.5	28,899	21.3	75,809	17.6
Middle	98	26.2	123,184	28.6	13,627	11.1	83,124	19.3
Upper	107	28.6	143,456	33.3	5,865	4.1	168,421	39.1
Unknown	4	1.1	12	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>374</b>	<b>100.0</b>	<b>430,790</b>	<b>100.0</b>	<b>59,155</b>	<b>13.7</b>	<b>430,790</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	47,834	19,121	5.1	40.0	22,334	46.7	6,379	13.3
Moderate	230,129	101,207	27.1	44.0	105,487	45.8	23,435	10.2
Middle	202,353	108,661	29.1	53.7	76,286	37.7	17,406	8.6
Upper	212,950	144,997	38.8	68.1	55,701	26.2	12,252	5.8
Unknown	12	12	0.0	100.0	0	0.0	0	0.0
<b>Total AA</b>	<b>693,278</b>	<b>373,998</b>	<b>100.0</b>	<b>53.9</b>	<b>259,808</b>	<b>37.5</b>	<b>59,472</b>	<b>8.6</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4,198	5.0	3,709	4.7	465	9.0	24	3.1
Moderate	19,673	23.3	18,246	23.3	1,314	25.5	113	14.5
Middle	24,364	28.9	22,531	28.7	1,646	32.0	187	24.0
Upper	35,975	42.6	33,840	43.1	1,683	32.7	452	58.0
Unknown	193	0.2	147	0.2	43	0.8	3	0.4
<b>Total AA</b>	<b>84,403</b>	<b>100.0</b>	<b>78,473</b>	<b>100.0</b>	<b>5,151</b>	<b>100.0</b>	<b>779</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.0</b>	<b>6.1</b>		<b>0.9</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	13	1.4	12	1.3	1	8.3	0	0.0
Moderate	128	13.8	127	13.9	1	8.3	0	0.0
Middle	307	33.0	300	32.8	6	50.0	1	100.0
Upper	481	51.8	477	52.1	4	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>929</b>	<b>100.0</b>	<b>916</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.6</b>	<b>1.3</b>		<b>0.1</b>	
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 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

The bank's lending performance is adequate. Despite the bank not originating home improvement or multifamily loans during the review period and extending insufficient volume of refinance and home purchase loans in 2020 to conduct a meaningful analysis, the lending activity reflects adequate responsiveness to AA credit needs. The geographic distribution of loans reflects good penetration throughout the AA. The distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. Given that 77.4 percent of the bank's HMDA lending in 2020 and 2021 were home purchase loans, the analysis of the bank's performance in regard to HMDA lending centered on home purchase loans. Moreover, the bank's small business lending activity carried more weight when assessing the bank's performance. Refer to Appendix C for details of the bank's 2019 mortgage and small business lending and information regarding lending by aggregate lenders.

The bank makes a relatively high level of community development loans and uses flexible lending practices in serving AA credit needs, including its heavy involvement in originating loans under the SBA's PPP. Further, as the bank noted customers facing financial hardship due to the pandemic the bank made 155 loan modifications within the San Antonio Metropolitan AA. These modifications included 90- and 180-day deferrals, as well as 90-day interest only modifications on loans totaling more than \$150 million.

### ***Geographic Distribution of Loans***

For this analysis, the geographic distribution of HMDA and small business lending, including both originations and purchases, was compared with available demographic information and aggregate lending data, taking into account any performance context issues. Considering all of these factors, Vantage's geographic distribution of loans reflects adequate penetration throughout LMI census tracts in the AA, with no conspicuous gaps or anomalies noted in its lending patterns. Limited availability of owner-occupied housing units in LMI census tracts, the competitive housing market, limited geographic borrower pool, and lower market share compared to larger national and regional financial institutions operating within the AA account for the bank's limited level of lending compared to the demographics. The distribution of the remainder of bank lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in low- and moderate-income geographies.

### *Residential Real Estate (HMDA) Lending*

The geographic distribution of HMDA loans reflects adequate penetration throughout the AA. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. In 2020, the bank originated only one HMDA loan in a low-income census tract, aligning with the percentage of loans reported by aggregate HMDA lenders. In 2021, the bank did not originate any HMDA-reportable loans in low-income tracts; however, the bank's performance was similar to that of aggregate lenders, which originated 1.7 percent of HMDA-reportable loans in these tracts. Neither aggregate lending data nor Vantage's performance reached the demographic figure of owner-occupied units in low-income census tracts.

The bank's performance in moderate-income census tracts in 2020 was comparable to that of aggregate lending data. The bank's performance fell below aggregate lending data in 2021. In both

years, the institution and aggregate lending data were well below the demographic figure for moderate-income tracts.

**Table 13**

Distribution of 2020 and 2021 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 %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	1.7	0	0.0	1.2	0	0.0	2.0	0	0.0	1.4	5.1
Moderate	2	9.5	14.5	324	3.8	10.0	0	0.0	15.6	0	0.0	11.0	27.1
Middle	6	28.6	34.1	1,200	14.0	28.4	11	25.0	35.0	3,107	18.6	29.0	29.1
Upper	13	61.9	49.7	7,043	82.2	60.3	33	75.0	47.4	13,583	81.4	58.6	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>8,567</b>	<b>100.0</b>	<b>100.0</b>	<b>44</b>	<b>100.0</b>	<b>100.0</b>	<b>16,690</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	14.3	1.0	282	12.6	0.7	0	0.0	1.1	0	0.0	0.8	5.1
Moderate	1	14.3	10.0	190	8.5	6.5	3	27.3	11.8	759	23.3	7.9	27.1
Middle	1	14.3	27.0	96	4.3	21.2	6	54.5	29.2	1,456	44.7	23.5	29.1
Upper	4	57.1	62.0	1,676	74.7	71.6	2	18.2	57.9	1,044	32.0	67.8	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>2,244</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>3,259</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.4	0	0.0	1.7	0	0.0	2.7	0	0.0	1.8	5.1
Moderate	0	0.0	16.0	0	0.0	12.6	0	0.0	19.3	0	0.0	15.0	27.1
Middle	0	0.0	24.1	0	0.0	19.5	0	0.0	23.8	0	0.0	18.7	29.1
Upper	0	0.0	57.5	0	0.0	66.2	0	0.0	54.3	0	0.0	64.6	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	7.5	0	0.0	4.3	0	0.0	9.1	0	0.0	5.3	7.1
Moderate	0	0.0	51.9	0	0.0	44.3	0	0.0	45.5	0	0.0	37.4	38.7
Middle	0	0.0	22.5	0	0.0	27.0	0	0.0	24.7	0	0.0	28.1	30.4
Upper	0	0.0	18.1	0	0.0	24.4	0	0.0	20.8	0	0.0	29.2	23.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	1	3.6	1.4	282	2.6	1.1	0	0.0	1.7	0	0.0	1.4	5.1
Moderate	3	10.7	13.1	514	4.8	10.4	3	5.4	14.3	759	3.7	11.8	27.1
Middle	7	25.0	31.0	1,296	12.0	25.4	17	30.4	32.3	4,563	22.3	26.8	29.1
Upper	17	60.7	54.4	8,719	80.6	63.0	36	64.3	51.8	15,172	74.0	60.0	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>10,811</b>	<b>100.0</b>	<b>100.0</b>	<b>56</b>	<b>100.0</b>	<b>100.0</b>	<b>20,494</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2011-2015 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 loans reflects adequate penetration throughout the AA. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. The table below demonstrates that the bank’s 2020 and 2021 small business lending in LMI census tracts was below the performance of aggregate lenders as well as the AA demographics. While the majority of AA businesses are domiciled within middle-and upper-income census tracts, the bank’s distribution of small business loans in LMI tracts does not reflect favorably on the bank’s responsiveness to the credit needs of small businesses in the AA.

**Table 14**

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: San Antonio Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
<b>Low</b>	11	4.1	4.8	2,763	5.3	6.3	4	2.2	4.5	1,487	3.6	6.1	5.0
<b>Moderate</b>	51	19.1	22.7	10,164	19.5	22.8	27	14.6	22.7	5,792	14.0	22.5	23.3
<b>Middle</b>	82	30.7	27.2	15,936	30.6	28.4	74	40.0	26.9	15,359	37.1	27.0	28.9
<b>Upper</b>	122	45.7	44.6	22,924	44.0	41.9	80	43.2	45.3	18,712	45.3	43.8	42.6
<b>Unknown</b>	1	0.4	0.3	254	0.5	0.3	0	0.0	0.3	0	0.0	0.3	0.2
<b>Total</b>	267	100.0	100.0	52,041	100.0	100.0	185	100.0	100.0	41,350	100.0	100.0	100.0

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 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 Sizes***

The bank’s distribution of lending to borrowers reflects an adequate penetration among individuals of different income levels and businesses of different revenue sizes. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank’s performance considering its lending to LMI borrowers.

***Residential Real Estate (HMDA) Lending***

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

In 2020 and 2021, the bank originated few HMDA-reportable loans to low-income borrowers in the San Antonio Metropolitan AA. Due to the bank’s low level of HMDA-reportable activity, the percentage of Vantage’s originations to low-income borrowers is greater than the performance of aggregate lenders but remains below the demographics figure. During the review period, the bank originated one HMDA-reportable loan to a moderate-income borrower, reflecting performance below both aggregate lending data and the demographic figure.

While the bank's loan dispersion among middle- and upper-income borrowers did not impact the overall conclusion, it is notable that approximately 20 percent of the bank's HMDA-reportable lending in the San Antonio Metropolitan AA were extended to borrowers with income classified as unknown.

**Table 15**  
**Distribution of 2020 and 2021 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 %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	0	0.0	3.5	0	0.0	1.8	1	2.3	2.7	110	0.7	1.4	24.0
Moderate	0	0.0	18.0	0	0.0	12.8	1	2.3	15.9	170	1.0	11.3	17.6
Middle	3	14.3	25.6	726	8.5	22.7	1	2.3	22.9	147	0.9	20.3	19.3
Upper	12	57.1	39.0	4,918	57.4	48.3	33	75.0	33.1	14,429	86.5	42.6	39.1
Unknown	6	28.6	13.8	2,923	34.1	14.3	8	18.2	25.4	1,834	11.0	24.3	0.0
<b>Total</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>8,567</b>	<b>100.0</b>	<b>100.0</b>	<b>44</b>	<b>100.0</b>	<b>100.0</b>	<b>16,690</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	1	14.3	1.9	96	4.3	0.8	1	9.1	2.9	127	3.9	1.5	24.0
Moderate	0	0.0	6.3	0	0.0	3.6	0	0.0	9.2	0	0.0	5.8	17.6
Middle	2	28.6	12.7	415	18.5	9.1	1	9.1	15.3	175	5.4	11.6	19.3
Upper	3	42.9	36.2	1,45	64.7	40.3	6	54.5	34.0	1,982	60.8	39.6	39.1
Unknown	1	14.3	42.9	282	12.6	46.1	3	27.3	38.5	975	29.9	41.6	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>2,244</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>3,259</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	6.4	0	0.0	3.9	0	0.0	6.5	0	0.0	3.6	24.0
Moderate	0	0.0	13.3	0	0.0	10.0	0	0.0	13.1	0	0.0	8.4	17.6
Middle	0	0.0	19.1	0	0.0	15.4	0	0.0	19.0	0	0.0	15.4	19.3
Upper	0	0.0	58.5	0	0.0	68.2	0	0.0	59.2	0	0.0	69.6	39.1
Unknown	0	0.0	2.7	0	0.0	2.5	0	0.0	2.2	0	0.0	2.9	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	1	3.6	2.7	96	0.9	1.3	2	3.6	2.9	237	1.2	1.4	24.0
Moderate	0	0.0	11.9	0	0.0	8.4	1	1.8	12.7	170	0.8	8.9	17.6
Middle	5	17.9	18.5	1,141	10.6	15.9	2	3.6	19.2	322	1.6	16.6	19.3
Upper	15	53.6	36.2	6,369	58.9	43.6	40	71.4	33.6	16,956	82.7	41.4	39.1
Unknown	7	25.0	30.6	3,205	29.6	30.7	11	19.6	31.7	2,809	13.7	31.7	0.0
<b>Total</b>	<b>28</b>	<b>100.0</b>	<b>100.0</b>	<b>10,811</b>	<b>100.0</b>	<b>100.0</b>	<b>56</b>	<b>100.0</b>	<b>100.0</b>	<b>20,494</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2011-2015 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**

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is good. While Vantage's overall lending levels were below aggregate lenders and the percentage of AA businesses reporting annual revenues of \$1

million or less, 64.4 percent and 56.6 percent of the small business loans originated in 2020 and 2021, respectively, were extended to businesses with unknown revenues. The high volume of small business loans extended to businesses with unknown revenues during the review period is primarily due to the bank not relying on borrower revenue for all commercial loan products and its extensive participation in the SBA’s PPP. Although the 2020 and 2021 distribution of borrowers appears unfavorable to small businesses in the AA, the bank’s engagement in the PPP loans indicates responsiveness to the credit needs of small businesses in the AA.

**Table 16**

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													Total Businesses %
Assessment Area: San Antonio Metropolitan													
Bank And Aggregate Loans By Year													
2020						2021							
Bank		Agg		Bank		Agg		Bank		Agg			
#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%		
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	39	14.6	35.6	9,195	17.7	23.0	33	17.8	40.7	9,129	22.1	27.9	93.0
<b>Over \$1 Million</b>	56	21.0		15,556	29.9		48	25.9		14,132	34.2		6.1
<b>Revenue Unknown</b>	172	64.4		27,290	52.4		104	56.2		18,089	43.7		0.9
<b>Total</b>	267	100.0		52,041	100.0		185	100.0		41,350	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	140	52.4	87.0	6,623	12.7	31.2	84	45.4	91.2	3,878	9.4	35.5	
<b>\$100,001 - \$250,000</b>	62	23.2	7.5	11,169	21.5	20.7	37	20.0	4.9	6,311	15.3	18.5	
<b>\$250,001 - \$1 Million</b>	65	24.3	5.5	34,249	65.8	48.1	64	34.6	3.9	31,161	75.4	46.0	
<b>Total</b>	267	100.0	100.0	52,041	100.0	100.0	185	100.0	100.0	41,350	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	18	46.2		835	9.1		11	33.3		550	6.0		
<b>\$100,001 - \$250,000</b>	7	17.9		1,177	12.8		4	12.1		661	7.2		
<b>\$250,001 - \$1 Million</b>	14	35.9		7,183	78.1		18	54.5		7,918	86.7		
<b>Total</b>	39	100.0		9,195	100.0		33	100.0		9,129	100.0		

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Community Development Lending**

The bank makes a relatively high level of community development loans in the AA. During the review period, the bank originated 15 qualifying community development loans, totaling \$56.1 million in its San Antonio Metropolitan AA. The community development loans originated focused exclusively on revitalizing and stabilizing the AA. A large portion of the bank’s qualified community development lending came from its significant participation in the SBA’s PPP, which was implemented specifically to help businesses retain their employees during the COVID-19 pandemic. Furthermore, the bank’s performance represents a substantial increase in the dollar amount of community development loans since the previous CRA evaluation.

**Investment Test**

The bank’s level of qualified investments in the AA is excellent. The bank has a significant level of qualified community development investments and grants in the AA, particularly those not routinely provided by private investors, occasionally placing it in a leadership position. Vantage’s donations were primarily extended to organizations that provide community services to LMI individuals. Investments were split between CRA-focused mortgage-backed securities and bonds benefiting LMI geographies and individuals in the AA.

**Table 17**

Investments, Grants, and Donations Assessment Area: San Antonio Metropolitan								
Community Development Purpose	Current Investments <sup>1</sup>		Prior Period Investments <sup>2</sup>		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	1	1,593	1	2,127	0	0	2	3,720
Community Services	0	0	0	0	10	60	10	60
Economic Development	0	0	0	0	1	2	1	2
Revitalization and Stabilization	1	1,764	1	3,408	0	0	2	5,172
<b>Total</b>	<b>2</b>	<b>3,357</b>	<b>2</b>	<b>5,535</b>	<b>11</b>	<b>62</b>	<b>15</b>	<b>8,954</b>

<sup>1</sup> Original Market Value of Investment  
<sup>2</sup> Book Value of Investment

**Service Test**

The bank’s Service Test performance in the AA is adequate. However, the limited level of community development services reflects poor responsiveness to the needs of the AA.

*Retail Services*

The bank’s delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in its AA. The distribution of the bank’s three branch offices and three ATMs as of August 1, 2022, was 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 18**

Branch and Full-Service ATM Locations Assessment Area: San Antonio Metropolitan							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full-service ATMs	
				#	%	#	%
Low	8.8	7.2	5.0	1	33.3	1	33.3
Moderate	35.3	33.3	23.3	0	0.0	0	0.0
Middle	26.2	29.0	28.9	1	33.3	1	33.3
Upper	28.6	30.5	42.6	1	33.3	1	33.3
Unknown	1.1	0.0	0.2	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>

The bank did not open or close any branches in the AA during the review period. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are consistent throughout the AA.

*Community Development Services*

The bank provides a limited level of community development services in the AA. The bank's community development services significantly decreased since the prior CRA evaluation, with only one bank representative serving as a board member of two organizations that provide community services to LMI individuals in the AA. The decrease is partially attributed to the COVID-19 pandemic, which limited the opportunity for banks to provide in-person services due to quarantine and social distancing measures. However, the limited number of services provided does not reflect favorably on the bank's community development service performance.

**Description of the Institution’s Operations in the McAllen MSA Assessment Area**

The bank’s McAllen MSA AA consists of the entirety of the McAllen-Edinburg-Mission, Texas MSA (McAllen MSA), which consists of Hidalgo County in the Rio Grande Valley region of South Texas. Refer to Appendix A for an AA map and Appendix B for additional demographic data.

- The McAllen MSA AA contains 113 census tracts, of which 0.9 percent are low-income and 28.3 percent are moderate-income. No material changes have been made in the makeup of the AA since the previous examination.
- As of June 30, 2021, 19 financial institutions held approximately \$13.6 billion in deposits in the McAllen MSA AA. Vantage ranked fourth, with \$1.5 billion in deposits in the AA, constituting a market share of 10.9 percent.
- In 2021, 361 financial institutions reported 15,859 HMDA-reportable loan originations or purchases in the McAllen MSA AA, with Vantage Bank ranking 48<sup>th</sup> after originating less than one percent of the reported loans. Of the 126 institutions that reported CRA small business and small farm loan data in 2021, Vantage ranked 16<sup>th</sup>, originating approximately 2.0 percent of the reported loans.
- Examiners interviewed two representatives of community organizations that promote economic development and extend housing-related services for LMI individuals and families. The community leaders indicated that the AA needs include increased availability of multifamily affordable housing and the provision of financial education for LMI families as well as small and start-up businesses.

**Table 19**

<b>Population Change</b>			
<b>Assessment Area: McAllen MSA</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
McAllen MSA	774,769	819,217	5.7
Texas	25,145,561	26,538,614	5.5

*Source: 2010 U.S. Census Bureau Decennial Census  
2011 - 2015 U.S. Census Bureau American Community Survey*

- The McAllen MSA has experienced modest and steady growth since 2010, which is comparable to the growth. According to U.S. Census Bureau data, the MSA has grown approximately 12.4 percent between 2010 and 2020.
- McAllen, the largest city in the MSA, has approximately 16 percent of the total population.

**Table 20**

<b>Median Family Income Change</b>			
<b>Assessment Area: McAllen MSA</b>			
<b>Area</b>	<b>2010 Median Family Income</b>	<b>2015 Median Family Income</b>	<b>Percent Change</b>
McAllen MSA	\$37,140	\$37,529	1.0
Texas	\$63,314	\$62,717	-0.9

*Source: 2006 - 2010 U.S. Census Bureau American Community Survey  
2011 - 2015 U.S. Census Bureau American Community Survey  
Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.*

- Approximately 29.9 percent of the total families domiciled within the McAllen MSA report family income levels below the poverty level. This is significantly higher than the statewide poverty level of 13.5 percent.
- According to 2015 ACS Data, 41.4 percent of the AA families were LMI, which is slightly above the statewide rate of 40.0 percent
- The McAllen MSA MFI has remained fairly stable since 2010 and almost half the state of Texas' MFI.

**Table 21**

<b>Housing Cost Burden</b>						
<b>Assessment Area: McAllen MSA</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
McAllen MSA	73.0	39.7	45.5	55.0	25.7	22.1
Texas	78.1	51.1	42.5	60.1	34.8	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), 2014-2018 Comprehensive Housing Affordability Strategy*

- The housing affordability ratio in the McAllen MSA, at 43.9 percent, was higher than the statewide ratio of 39.1 percent, indicating that housing in is slightly more affordable than the statewide average.
- Overall, the cost burden for LMI homeowners and renters is slightly lower than the statewide figure, while the burden on renters and owners of all income levels is slightly higher than the statewide average.

**Table 22**

<b>Unemployment Rates</b>					
<b>Assessment Area: McAllen MSA</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
McAllen MSA	7.5	6.6	6.3	11.7	9.3
Texas	4.3	3.9	3.5	7.7	5.7

*Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics*

- According to the Bureau of Economic Analysis, the McAllen MSA economy has an emphasis in educational services, health care, and social assistance, as well as government and government enterprises.
- Major employers in the McAllen MSA include H-E-B (grocery), McAllen and Edinburg Independent School Districts (education), University of Texas Rio Grande Valley (education) and Hidalgo County (local government).
- The MSA's unemployment rates during the review period almost double the statewide unemployment rates, with both increasing significantly in 2020 as a result of the COVID-19 pandemic. Unemployment rates for the MSA and the state of Texas have decreased in 2021, but have yet to reach pre-pandemic levels.

The following table details selected characteristics of the AA.

**Table 23**

2021 McAllen Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	1	0.9	2,741	1.5	1,854	67.6	46,048	25.1
Moderate	32	28.3	48,286	26.3	21,103	43.7	29,886	16.3
Middle	46	40.7	76,106	41.5	22,358	29.4	28,262	15.4
Upper	31	27.4	55,935	30.5	9,440	16.9	79,139	43.2
Unknown	3	2.7	267	0.1	108	40.4	0	0.0
<b>Total AA</b>	<b>113</b>	<b>100.0</b>	<b>183,335</b>	<b>100.0</b>	<b>54,863</b>	<b>29.9</b>	<b>183,335</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,162	2,091	1.4	66.1	828	26.2	243	7.7
Moderate	65,913	37,566	24.6	57.0	20,071	30.5	8,276	12.6
Middle	108,000	64,456	42.3	59.7	28,114	26.0	15,430	14.3
Upper	80,442	48,068	31.5	59.8	22,371	27.8	10,003	12.4
Unknown	609	371	0.2	60.9	85	14.0	153	25.1
<b>Total AA</b>	<b>258,126</b>	<b>152,552</b>	<b>100.0</b>	<b>59.1</b>	<b>71,469</b>	<b>27.7</b>	<b>34,105</b>	<b>13.2</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	106	0.4	100	0.4	5	0.3	1	0.5
Moderate	5,449	19.9	5,069	19.7	336	22.5	44	22.8
Middle	9,428	34.4	8,839	34.4	529	35.4	60	31.1
Upper	12,382	45.2	11,674	45.4	620	41.4	88	45.6
Unknown	45	0.2	39	0.2	6	0.4	0	0.0
<b>Total AA</b>	<b>27,410</b>	<b>100.0</b>	<b>25,721</b>	<b>100.0</b>	<b>1,496</b>	<b>100.0</b>	<b>193</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.8</b>	<b>5.5</b>		<b>0.7</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	7	2.0	6	1.9	1	4.0	0	0.0
Moderate	66	19.3	61	19.2	5	20.0	0	0.0
Middle	136	39.8	123	38.8	13	52.0	0	0.0
Upper	127	37.1	122	38.5	5	20.0	0	0.0
Unknown	6	1.8	5	1.6	1	4.0	0	0.0
<b>Total AA</b>	<b>342</b>	<b>100.0</b>	<b>317</b>	<b>100.0</b>	<b>25</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>92.7</b>	<b>7.3</b>		<b>0.0</b>	
<i>Source: 2021 FFIEC Census Data                  2021 Dun &amp; Bradstreet Data                  2011-2015 U.S. Census Bureau: American Community Survey                  Note: Percentages may not total 100.0 percent due to rounding.</i>								



## Conclusions With Respect to Performance Tests

### Lending Test

The bank's lending performance is good, as it is responsive to the AA credit needs. The geographic and borrower loan distribution reflects good penetration and dispersion throughout the AA and among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes an adequate level of community development loans.

The bank did not originate sufficient volume of home refinance, home improvement, or multifamily loans in the McAllen MSA AA during the review period to allow for meaningful analysis of individual loan products; thus, these product categories were combined and analyzed at the total HMDA level.

Details of the bank's 2019 mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix C.

In addition to the bank's retail and community development lending performance, the bank also made use of flexible lending practices in serving AA credit needs. The bank was heavily involved in originating loans under the SBA's PPP, a program specifically designed to assist businesses retain employees and keep operating during the COVID-19 pandemic. Further, the bank made 309 loan modifications within the AA to assist customers facing financial hardship due to the pandemic. These modifications included 30-, 90-, and 180-day deferrals, as well as 90-day interest-only loan modifications totaling approximately \$377 million.

### ***Geographic Distribution of Loans***

For this analysis, the geographic distribution of HMDA and small business lending was compared with available demographic information and aggregate lending data. Moreover, examiners considered performance context related to the local economic conditions and AA credit needs. Small business lending received greater weight in the analysis based on the loan portfolio composition and a majority of the bank's lending occurring in this category.

The bank's geographic distribution of loans reflects good penetration throughout the AA, with no conspicuous gaps or anomalies noted in the lending patterns. The distribution of the remainder of bank's lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI census tracts.

### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of HMDA loans reflects adequate penetration throughout the AA. In 2020 and 2021, the bank originated nine HMDA loans to borrowers in LMI census tracts. While the bank's performance was similar to aggregate lender performance in low-income tracts, Vantage exceeded aggregate lender performance in moderate-income tracts in 2020 but fell below the performance of aggregate lenders in 2021. As illustrated in the table below, both the bank and aggregate lenders performed below the demographic figures of owner-occupied properties in LMI census tracts. According to the 2015 ACS survey over 50.0 percent of housing units in LMI census tracts consist of rental housing units, which limits opportunities for lenders to extend home purchase mortgage loans in LMI geographies in the AA. Furthermore, the bank operates in a highly competitive HMDA lending market that includes large national and regional

financial institutions competing for loans in a limited geographic borrower pool. The bank's HMDA lending represents less than 1.0 percent of the HMDA market share in 2020 and 2021, while the leading HMDA lenders in the market represented 8.0 percent and 6.4 percent, respectively. Vantage's performance, while limited, demonstrates willingness to originate home purchase loans to borrowers residing in LMI census tracts.

**Table 24**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: McAllen Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	%	%	#	%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	1.4
Moderate	7	13.5	12.3	1,398	11.8	10.1	3	8.6	13.8	647	6.7	11.1	24.6
Middle	17	32.7	40.0	3,012	25.5	37.3	12	34.3	39.0	2,491	26.0	36.2	42.3
Upper	27	51.9	47.2	6,979	59.1	52.0	20	57.1	46.8	6,461	67.3	51.7	31.5
Unknown	1	1.9	0.2	418	3.5	0.2	0	0.0	0.1	0	0.0	0.1	0.2
<b>Total</b>	<b>52</b>	<b>100.0</b>	<b>100.0</b>	<b>11,807</b>	<b>100.0</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>	<b>100.0</b>	<b>9,599</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.3	0	0.0	0.4	0	0.0	0.3	0	0.0	0.3	1.4
Moderate	2	10.0	9.8	443	10.8	8.8	2	8.3	11.2	246	3.6	10.3	24.6
Middle	6	30.0	32.1	911	22.3	29.8	4	16.7	34.7	438	6.4	32.8	42.3
Upper	12	60.0	57.6	2,737	66.9	60.8	18	75.0	53.6	6,173	90.0	56.4	31.5
Unknown	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0	0.0	0.2	0.2
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>4,091</b>	<b>100.0</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>6,857</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	1.1	0	0.0	0.8	1.4
Moderate	0	0.0	20.0	0	0.0	16.0	0	0.0	15.4	0	0.0	16.2	24.6
Middle	0	0.0	29.7	0	0.0	23.8	0	0.0	37.4	0	0.0	32.5	42.3
Upper	1	100.0	49.7	27	100.0	59.2	0	0.0	46.2	0	0.0	50.5	31.5
Unknown	0	0.0	0.7	0	0.0	1.1	0	0.0	0.0	0	0.0	0.0	0.2
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.4
Moderate	0	0.0	18.8	0	0.0	16.1	2	50.0	9.1	438	35.6	2.6	20.1
Middle	1	50.0	51.6	322	43.4	48.3	1	25.0	44.5	120	9.8	42.2	33.2
Upper	1	50.0	29.7	420	56.6	35.6	1	25.0	46.4	672	54.6	55.2	46.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>742</b>	<b>100.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>1,230</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	1.4
Moderate	9	11.3	11.5	1,841	10.7	9.8	9	13.0	12.7	1,487	8.2	10.6	24.6
Middle	25	31.3	36.8	4,290	25.0	34.6	18	26.1	37.4	3,127	17.2	35.4	42.3
Upper	45	56.3	51.2	10,630	61.9	55.0	42	60.9	49.4	13,567	74.6	53.6	31.5
Unknown	1	1.3	0.2	418	2.4	0.2	0	0.0	0.2	0	0.0	0.1	0.2
<b>Total</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>	<b>17,179</b>	<b>100.0</b>	<b>100.0</b>	<b>69</b>	<b>100.0</b>	<b>100.0</b>	<b>18,181</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2011-2015 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 loans reflects good penetration throughout the AA when compared to demographics and the performance of the aggregate lenders. The bank extended one loan to a business located in a low-income census tract in 2020 and none in 2021. For both years the bank’s performance fell slightly below aggregate lender performance and the total percentage of businesses located in these census tracts. Vantage’s performance, while limited, is considered good based on the limited number of businesses located within low-income census tracts in the AA.

In 2020 and 2021 the bank’s small business lending in moderate-income tracts fell below the performance of aggregate lenders and the percentage of businesses located within these census tracts. While the bank originated a limited amount of loans during the review period, the bank’s lending is responsive to the needs of small businesses located in moderate-income census tracts and demonstrates the bank’s willingness to lend to businesses in these tracts.

**Table 25**

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: McAllen Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Low</b>	1	0.2	0.5	154	0.2	0.4	0	0.0	0.6	0	0.0	0.3	0.4
<b>Moderate</b>	80	14.9	20.0	10,257	11.7	20.1	55	14.9	19.4	6,782	10.9	20.0	19.9
<b>Middle</b>	188	35.1	33.5	36,024	41.0	33.6	129	35.0	35.2	24,640	39.5	33.9	34.4
<b>Upper</b>	267	49.8	45.1	41,458	47.2	45.1	185	50.1	43.7	31,022	49.7	44.8	45.2
<b>Unknown</b>	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	0.2
<b>Total</b>	536	100.0	100.0	87,893	100.0	100.0	369	100.0	100.0	62,444	100.0	100.0	100.0

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 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 Sizes***

The bank’s distribution of lending to borrowers reflects a good penetration among individuals of different income levels (including low- and moderate-income) and businesses of different revenue sizes. The distribution of the remainder of bank lending to middle- and upper-income borrowers did not affect conclusions about the bank’s performance considering its lending to low- and moderate-income borrowers.

***Residential Real Estate (HMDA) Lending***

HMDA lending by borrower income in the AA is good when compared to demographic characteristics, as well as the performance of aggregate HMDA lenders in the AA. A larger

percentage of AA families are classified as LMI; as a result, the bank's performance in originating HMDA-reportable loans to LMI borrowers demonstrates Vantage's responsiveness to the AA credit needs.

In 2020 and 2021, the bank originated few HMDA-reportable loans to low-income borrowers in the McAllen MSA AA; however, the bank's performance is greater than the performance of aggregate lenders. The bank's performance in originating HMDA loans to moderate-income borrowers in the AA was greater than the performance of aggregate lenders in 2020, and similar to aggregate performance in 2021. Neither the bank nor aggregate lenders performed to the level of the demographic figure in either year. Several factors may account for the limited level of HMDA lending, including LMI families' difficulty in meeting underwriting criteria (e.g. down payment requirements and closing costs), limited availability of affordable housing in the AA, and the high level of competition in the AA. Based on ACS data, 25.1 percent and 16.3 percent of the families in the AA are considered low-income and moderate-income, respectively. While Vantage extended a limited number of HMDA loans to LMI borrowers, its performance reflects positively on its willingness to extend credit and its responsiveness to credit needs of AA borrowers.

**Table 26**  
**Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level**  
**Assessment Area: McAllen Metropolitan**

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	1	1.9	0.6	58	0.5	0.3	1	2.9	0.5	113	1.2	0.3	25.1
Moderate	2	3.8	5.7	167	1.4	3.3	0	0.0	4.8	0	0.0	2.7	16.3
Middle	7	13.5	18.0	1,131	9.6	13.9	4	11.4	14.5	600	6.3	11.0	15.4
Upper	40	76.9	59.0	10,297	87.2	65.8	27	77.1	49.7	7,818	81.4	55.4	43.2
Unknown	2	3.8	16.6	154	1.3	16.7	3	8.6	30.5	1,068	11.1	30.7	0.0
<b>Total</b>	<b>52</b>	<b>100.0</b>	<b>100.0</b>	<b>11,807</b>	<b>100.0</b>	<b>100.0</b>	<b>35</b>	<b>100.0</b>	<b>100.0</b>	<b>9,599</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.3	0	0.0	0.1	0	0.0	0.7	0	0.0	0.3	25.1
Moderate	2	10.0	2.5	153	3.7	1.2	2	8.3	3.3	218	3.2	1.8	16.3
Middle	1	5.0	8.3	102	2.5	5.4	4	16.7	8.7	474	6.9	6.1	15.4
Upper	17	85.0	58.8	3,836	93.8	61.0	17	70.8	55.6	5,974	87.1	57.2	43.2
Unknown	0	0.0	30.1	0	0.0	32.2	1	4.2	31.7	19	2.8	34.5	0.0
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>4,091</b>	<b>100.0</b>	<b>100.0</b>	<b>24</b>	<b>100.0</b>	<b>100.0</b>	<b>6,857</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.4	0	0.0	0.6	0	0.0	2.2	0	0.0	0.8	25.1
Moderate	0	0.0	5.5	0	0.0	3.8	0	0.0	13.2	0	0.0	8.8	16.3
Middle	0	0.0	17.9	0	0.0	12.7	0	0.0	16.5	0	0.0	15.1	15.4
Upper	1	100.0	71.0	27	100.0	77.7	0	0.0	64.8	0	0.0	69.6	43.2
Unknown	0	0.0	4.1	0	0.0	5.1	0	0.0	3.3	0	0.0	5.7	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	2	2.6	0.5	118	0.7	0.2	1	1.5	0.6	113	0.7	0.3	25.1
Moderate	5	6.4	4.0	395	2.4	2.3	2	3.1	4.3	218	1.3	2.4	16.3
Middle	9	11.5	12.9	1,278	7.8	9.9	11	16.9	11.9	1,239	7.3	9.0	15.4
Upper	60	76.9	53.8	14,492	88.2	60.5	47	72.3	51.5	14,122	83.3	55.6	43.2
Unknown	2	2.6	28.8	154	0.9	27.1	4	6.2	31.7	1,259	7.4	32.6	0.0
<b>Total</b>	<b>78</b>	<b>100.0</b>	<b>100.0</b>	<b>16,437</b>	<b>100.0</b>	<b>100.0</b>	<b>65</b>	<b>100.0</b>	<b>100.0</b>	<b>16,951</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data

2011-2015 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*

In comparison to the aggregate lenders' performance, Vantage's borrower distribution of small business loans by revenue size of businesses is good. The bank's overall lending levels were below aggregate lending data and the demographic figure of AA businesses reporting annual revenues of \$1 million or less; however, 432 out of the 536 small business loans originated by the bank in 2020 and 297 out of 369 small business loans originated in 2021 were extended to businesses with unknown revenues. The bank does not require the collection of borrower revenue information on all commercial loan products, which increases the number of unknown-revenue small business loans. This practice, along with the bank's participation in the SBA's PPP during the review period, resulted in more than 80 percent of small business loans extended by the bank in the McAllen MSA AA to not include revenue information. Although the 2020 and 2021 distribution of borrowers appears unfavorable to small businesses in the AA, the bank's high engagement in the PPP loans, indicates responsiveness to the credit needs of small businesses in the AA.

**Table 27**

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: McAllen Metropolitan													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	#%	\$(000)	%	%	#	%	#%	\$(000)	%	%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	62	11.6	31.8	19,768	22.5	23.2	50	13.6	34.4	16,834	27.0	30.5	93.8
<b>Over \$1 Million</b>	42	7.8		18,722	21.3		22	6.0		10,011	16.0		5.5
<b>Revenue Unknown</b>	432	80.6		49,403	56.2		297	80.5		35,599	57.0		0.7
<b>Total</b>	536	100.0		87,893	100.0		369	100.0		62,444	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	312	58.2	90.0	13,700	15.6	38.6	216	58.5	93.6	8,983	14.4	44.4	
<b>\$100,001 - \$250,000</b>	124	23.1	6.3	19,896	22.6	22.0	69	18.7	3.9	11,384	18.2	18.8	
<b>\$250,001 - \$1 Million</b>	100	18.7	3.7	54,297	61.8	39.4	84	22.8	2.6	42,077	67.4	36.8	
<b>Total</b>	536	100.0	100.0	87,893	100.0	100.0	369	100.0	100.0	62,444	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	17	27.4		1,137	5.8		14	28.0		830	4.9		
<b>\$100,001 - \$250,000</b>	19	30.6		2,978	15.1		11	22.0		2,035	12.1		
<b>\$250,001 - \$1 Million</b>	26	41.9		15,653	79.2		25	50.0		13,969	83.0		
<b>Total</b>	62	100.0		19,768	100.0		50	100.0		16,834	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

*Community Development Lending*

The bank makes a relatively high level of community development loans in the AA. During the review period, the bank originated 15 qualifying community development loans, totaling \$41.1

million in the McAllen MSA AA. This represents a material increase in community development qualified lending in the AA. A large portion of the bank’s qualified community development lending in the AA came from the bank’s significant participation in the SBA’s PPP.

**Table 28**

<b>Community Development Lending Assessment Area: McAllen MSA</b>		
<b>Purpose</b>	<b>#</b>	<b>\$000s</b>
Economic Development	2	17,726
Revitalization and Stabilization	13	23,408
<b>Totals</b>	<b>15</b>	<b>41,134</b>

**Investment Test**

The bank has an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors. Despite the adequate level of investments, Vantage is rarely in a leadership position. The largest portion of the bank’s activity is comprised of two investments in local school districts where a majority of students qualify for free or reduced-price lunches. The bank also made sizable donations to community foodbanks and small business development centers.

**Table 29**

<b>Investments, Grants, and Donations Assessment Area: McAllen MSA</b>						
<b>Community Development Purpose</b>	<b>Current Investments</b>		<b>Donations</b>		<b>Total</b>	
	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>	<b>#</b>	<b>\$(000s)</b>
Community Services	0	0	13	31	13	31
Economic Development	0	0	2	7	2	7
Revitalization and Stabilization	2	1,851	0	0	2	1,851
<b>Total</b>	<b>2</b>	<b>1,851</b>	<b>15</b>	<b>38</b>	<b>17</b>	<b>1,889</b>

**Service Test**

The bank’s Service Test performance is adequate. Its retail and community development services reflect adequate responsiveness to the needs of the AA.

*Retail Services*

The bank’s delivery systems are accessible to the bank’s geographies and individuals of different income levels in its AA. The distribution of the bank’s 11 branch offices and 13 ATMs as of August 1, 2022, was 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 McAllen MSA AA.



**Table 30**

Branch and Full-Service ATM Locations Assessment Area: McAllen MSA							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full-service ATMs	
				#	%	#	%
Low	0.9	1.7	0.4	0	0.0	0	0.0
Moderate	28.3	27.6	19.9	1	9.0	1	7.7
Middle	40.7	41.2	34.4	5	45.5	5	38.5
Upper	27.4	28.8	45.2	5	45.5	7	53.8
Unknown	2.7	0.6	0.1	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>

The bank did not open any branches during the review period; however, it closed four branches (two branches each in middle- and upper-income census tracts in the AA). The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are consistent throughout the AA.

*Community Development Services*

The bank provides a limited level of community development services in the AA. Bank representatives served in many various capacities, including leadership roles with Boys & Girls Clubs in the area, which provide youth and afterschool programs to LMI students. While this is a significant decrease in community development services in the AA since the previous examination, it is partially attributable to the COVID-19 pandemic, which severely limited the opportunity for banks to provide in-person services due to quarantine and social distancing measures. However, the limited number of services provided does not reflect favorably on the bank's community development service performance.

**Description of the Institution’s Operations in the El Paso Metropolitan Assessment Area**

The bank’s El Paso Metropolitan AA consists of a portion of the El Paso, Texas MSA. The bank includes El Paso County in the delineated AA, but excludes Hudspeth County, the other county included in the MSA. Refer to Appendix A for an AA map and Appendix B for additional demographic data.

- The bank expanded into the El Paso, Texas MSA since the previous examination. Therefore, this is the first time the bank’s performance in this AA is being evaluated.
- The El Paso Metropolitan AA contains 161 census tracts, of which 6.2 percent are classified as low-income tracts and 33.5 percent are moderate-income.
- As of June 30, 2021, 15 financial institutions held approximately \$11.2 billion in deposits in the El Paso Metropolitan AA. Vantage ranked seventh, with a market share of 2.6 percent consisting of approximately \$289 million in deposits.
- In 2021, 392 financial institutions reported 26,243 HMDA-reportable loans in the El Paso Metropolitan AA. Less than 0.1 percent of reported loans were originated by Vantage Bank, which ranked 84<sup>th</sup>. Additionally, of the 130 institutions that reported CRA small business and small farm loan data in 2021, Vantage ranked 21<sup>st</sup>, originating approximately 0.6 percent of the reported loans.
- In conjunction with this review, examiners interviewed a representative of an organization heavily involved in the provision of affordable housing in the AA. In addition, examiners reviewed the information provided by a community member involved in small business credit, who was interviewed a part of the CRA evaluation of another financial institution serving in the AA. The community contacts indicated that increased funding in CDFIs is crucial in the AA. Additionally, the contact highlighted the need for revitalization and stabilization efforts in the area to enhance local infrastructure and address blight caused by the region’s aging housing stock, vacant schools, and crumbling roads.

**Table 31**

<b>Population Change Assessment Area: El Paso Metropolitan</b>			
<b>Area</b>	<b>2010 Population</b>	<b>2015 Population</b>	<b>Percent Change</b>
El Paso Metropolitan	800,647	831,095	3.8
El Paso, Texas MSA	804,123	834,425	3.8
Texas	25,145,561	26,538,614	5.5

*Source: 2010 U.S. Census Bureau Decennial Census  
2011 - 2015 U.S. Census Bureau American Community Survey*

- The El Paso, Texas MSA has experienced slow, though steady, growth since 2010. According to U.S. Census Bureau data, the MSA has grown approximately 8.1 percent between 2010 and 2020, during which time the state of Texas has grown almost 16 percent.
- The city of El Paso is the largest city in the El Paso Metropolitan AA by a wide margin, accounting for approximately 78.4 percent of the total AA population.

**Table 32**

<b>Median Family Income Change</b>			
<b>Assessment Area: El Paso Metropolitan</b>			
<b>Area</b>	<b>2010 Median Family Income</b>	<b>2015 Median Family Income</b>	<b>Percent Change</b>
El Paso Metropolitan	\$43,916	\$46,096	5.0
El Paso, Texas MSA	\$43,836	\$46,033	5.0
Texas	\$63,314	\$62,717	-0.9

*Source: 2006 - 2010 U.S. Census Bureau American Community Survey  
2011 - 2015 U.S. Census Bureau American Community Survey  
Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.*

- The AA's MFI mirrors the El Paso, Texas MSA's, but lags significantly the MFI for the state of Texas. Conversely, the AA's MFI experienced a 5.0 percent increase between 2010 and 2015 while the state of Texas' MFI remained stagnant.
- Approximately 19.6 percent of the total families domiciled within the El Paso Metropolitan AA report family income levels below the poverty level, exceeding the statewide poverty level of 13.5 percent.
- According to 2015 ACS data, 39.7 percent of families in the AA were LMI, which is comparable with the statewide rate of 40.0 percent.

**Table 33**

<b>Housing Cost Burden</b>						
<b>Assessment Area: El Paso Metropolitan</b>						
<b>Area</b>	<b>Cost Burden - Renters</b>			<b>Cost Burden - Owners</b>		
	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Renters</b>	<b>Low Income</b>	<b>Moderate Income</b>	<b>All Owners</b>
El Paso Metropolitan	71.3	54.8	43.2	61.4	36.6	22.4
El Paso, Texas MSA	71.2	54.7	43.1	61.3	36.4	22.4
Texas	78.1	51.1	42.5	60.1	34.8	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), 2014-2018 Comprehensive Housing Affordability Strategy*

- The housing affordability ratio in the El Paso, Texas MSA, at 36.6 percent, was slightly below the statewide ratio of 39.1 percent, indicating that housing in the AA is less affordable than the statewide average.
- While the cost burden for low-income renters is slightly lower in the El Paso Metropolitan AA than the statewide average, for all other categories of LMI homeowners and renters, the cost burden is higher in the AA than in the state as a whole.

**Table 34**

<b>Unemployment Rates</b>					
<b>Assessment Area: El Paso Metropolitan</b>					
<b>Area</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
El Paso Metropolitan	4.7	4.3	3.8	8.3	6.2
El Paso, Texas MSA	4.7	4.3	3.8	8.3	6.2
Texas	4.3	3.9	3.5	7.7	5.7

*Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics*

- The AA's unemployment rate throughout the reviewed years was consistently higher than the statewide unemployment rate and notably impacted by the COVID-19 pandemic in 2020 and 2021.
- According to the Bureau of Economic Analysis, the economy of the El Paso, Texas MSA is diversified among government and governmental enterprises, private services-providing industries, and finance, insurance, and real estate.
- Major employers in the MSA include ADP (management services), Charles Schwab (financial services), and ECM International (engineering). However, general freight trucking represented the top traded industry in the MSA by employment.

The following table details selected characteristics of the AA.

**Table 35**

**2021 El Paso Metropolitan AA Demographics**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	10	6.2	7,088	3.6	3,599	50.8	43,488	22.3
Moderate	54	33.5	52,571	27.0	16,417	31.2	33,942	17.4
Middle	54	33.5	66,302	34.0	12,063	18.2	37,272	19.1
Upper	42	26.1	69,003	35.4	6,115	8.9	80,262	41.2
Unknown	1	0.6	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>161</b>	<b>100.0</b>	<b>194,964</b>	<b>100.0</b>	<b>38,194</b>	<b>19.6</b>	<b>194,964</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	12,489	2,952	1.8	23.6	7,990	64.0	1,547	12.4
Moderate	78,104	39,452	24.7	50.5	31,449	40.3	7,203	9.2
Middle	96,399	53,077	33.2	55.1	35,828	37.2	7,494	7.8
Upper	95,624	64,166	40.2	67.1	24,698	25.8	6,760	7.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>282,616</b>	<b>159,647</b>	<b>100.0</b>	<b>56.5</b>	<b>99,965</b>	<b>35.4</b>	<b>23,004</b>	<b>8.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,950	6.9	1,703	6.5	231	12.5	16	9.2
Moderate	7,561	26.9	6,818	26.1	700	38.0	43	24.9
Middle	8,657	30.7	8,084	30.9	522	28.3	51	29.5
Upper	9,850	35.0	9,433	36.1	357	19.4	60	34.7
Unknown	136	0.5	100	0.4	33	1.8	3	1.7
<b>Total AA</b>	<b>28,154</b>	<b>100.0</b>	<b>26,138</b>	<b>100.0</b>	<b>1,843</b>	<b>100.0</b>	<b>173</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.8</b>		<b>6.5</b>		<b>0.6</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6	4.2	5	3.6	1	16.7	0	0.0
Moderate	57	39.9	54	39.4	3	50.0	0	0.0
Middle	22	15.4	21	15.3	1	16.7	0	0.0
Upper	57	39.9	57	41.6	0	0.0	0	0.0
Unknown	1	0.7	0	0.0	1	16.7	0	0.0
<b>Total AA</b>	<b>143</b>	<b>100.0</b>	<b>137</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>95.8</b>		<b>4.2</b>		<b>0.0</b>

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 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

The bank's lending performance is adequate. Lending activity reflects adequate responsiveness to AA credit needs. The geographic distribution of loans reflects good penetration throughout the AA and adequate distribution among borrowers of different income levels and businesses of different revenue sizes. Additionally, the bank makes a relatively high level of community development loans.

The bank's HMDA origination volume within the AA is too low to conduct a meaningful analysis of the individual loan product categories; therefore, the product categories were combined and analyzed together as the total HMDA level.

Details of the bank's 2019 mortgage and small business lending and information regarding lending by aggregate lenders can be found in Appendix C.

In addition to the bank's retail and community development lending performance in the El Paso Metropolitan AA, the bank made use of flexible lending practices in serving AA credit needs via heavy involvement in originating loans under the SBA's PPP and extension of loan modifications to assist customers facing financial hardship due to the COVID-19 pandemic. The bank made 49 loan modifications in the El Paso Metropolitan AA, including 90-day deferrals and 90-day interest-only modifications totaling more than \$37 million.

### ***Geographic Distribution of Loans***

For this analysis, the geographic distribution of small business lending and HMDA lending was compared with available demographic information and aggregate lenders' performance. Performance context was taken into consideration when assessing the bank's performance.

The bank's geographic distribution of loans reflects good penetration throughout the AA, with no conspicuous gaps or anomalies noted in the lending patterns. The distribution of the remainder of bank lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in low- and moderate-income geographies.

### ***Residential Real Estate (HMDA) Lending***

The geographic distribution of HMDA loans reflects adequate penetration throughout the AA. This was based on performance compared to demographics, taking into consideration the performance of the aggregate lenders. Only the bank's total home mortgage loans were considered in this analysis, as the limited number of originations was insufficient to conduct a meaningful analysis of the individual loan product categories; thus, the product categories were combined and analyzed at the total HMDA level.

While the bank's lending performance was lower than the performance of aggregate lenders the and the AA demographic, this is primarily attributed to the limited opportunities to lend to LMI geographies. The limited opportunities are especially notable within low-income census tracts in the El Paso Metropolitan AA, with aggregate lending data reflecting less than one percent of total HMDA-reportable loans being in low-income tracts during the review period. Additionally, the bank's performance in extending HMDA-reportable loans in moderate-income geographies

increased in 2021, outperforming aggregate lenders. Despite the high level of competition for the limited lending opportunities in LMI tracts during the review period, the bank was adequately responsive in meeting the community and credit needs of borrowers in LMI census tracts with the AA.

**Table 36**

Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography													
Assessment Area: El Paso Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.5	0	0.0	0.3	0	0.0	0.5	0	0.0	0.3	1.8
Moderate	0	0.0	15.4	0	0.0	13.3	2	15.4	13.5	458	9.6	10.9	24.7
Middle	3	60.0	27.8	1,587	80.4	23.8	3	23.1	28.7	2,248	47.2	24.7	33.2
Upper	2	40.0	56.3	387	19.6	62.7	8	61.5	57.3	2,052	43.1	64.1	40.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>1,974</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>4,758</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.3	0	0.0	0.2	0	0.0	0.4	0	0.0	0.3	1.8
Moderate	0	0.0	8.7	0	0.0	7.3	1	33.3	10.0	232	13.4	8.5	24.7
Middle	0	0.0	23.9	0	0.0	19.7	0	0.0	25.9	0	0.0	21.5	33.2
Upper	7	100.0	67.2	1,532	100.0	72.8	2	66.7	63.7	1,495	86.6	69.7	40.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>1,532</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>1,727</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.5	0	0.0	1.0	0	0.0	0.0	0	0.0	0.0	1.8
Moderate	0	0.0	19.6	0	0.0	16.3	0	0.0	18.7	0	0.0	16.3	24.7
Middle	0	0.0	30.6	0	0.0	29.5	0	0.0	32.8	0	0.0	28.2	33.2
Upper	0	0.0	48.3	0	0.0	53.2	0	0.0	48.5	0	0.0	55.5	40.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
Low	0	0.0	22.6	0	0.0	2.5	0	0.0	20.5	0	0.0	3.2	12.3
Moderate	0	0.0	25.8	0	0.0	15.1	0	0.0	20.5	0	0.0	11.0	32.8
Middle	0	0.0	29.0	0	0.0	33.2	0	0.0	38.5	0	0.0	35.7	31.3
Upper	0	0.0	22.6	0	0.0	49.2	0	0.0	20.5	0	0.0	50.0	23.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
Low	0	0.0	0.4	0	0.0	0.3	0	0.0	0.5	0	0.0	0.5	1.8
Moderate	0	0.0	12.7	0	0.0	11.0	3	16.7	12.3	690	9.4	10.9	24.7
Middle	3	25.0	27.2	1,587	45.3	23.1	3	16.7	27.8	2,248	30.7	24.1	33.2
Upper	9	75.0	59.7	1,919	54.7	65.6	12	66.7	59.5	4,386	59.9	65.3	40.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>3,506</b>	<b>100.0</b>	<b>100.0</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>7,324</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

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

*Small Business Lending*

Vantage’s geographic distribution of small business loans reflects excellent penetration throughout the AA when compared to demographics and the aggregate lenders’ performance. In 2020 and 2021, the bank outperformed the aggregate in originating small business loans to businesses in LMI census tracts. The bank’s performance reflects favorably on its responsiveness to small business credit needs.

**Table 37**

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: El Paso Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Low</b>	10	9.8	6.6	1,030	7.6	8.0	9	9.4	6.2	1,915	10.2	8.3	6.9
<b>Moderate</b>	35	34.3	28.7	4,881	36.0	33.3	29	30.2	27.4	5,917	31.6	29.7	26.9
<b>Middle</b>	31	30.4	29.2	4,014	29.6	28.0	34	35.4	28.9	6,657	35.6	27.9	30.7
<b>Upper</b>	26	25.5	34.6	3,615	26.7	29.4	24	25.0	36.7	4,213	22.5	32.8	35.0
<b>Unknown</b>	0	0.0	0.4	0	0.0	0.6	0	0.0	0.4	0	0.0	1.0	0.5
<b>Total</b>	102	100.0	100.0	13,540	100.0	100.0	96	100.0	100.0	18,702	100.0	100.0	100.0

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 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 Sizes***

The bank’s distribution of lending to borrowers reflects an adequate penetration among individuals of different income levels and businesses of different revenue sizes. It is noteworthy that the distribution of the bank’s lending to middle- and upper-income borrowers did not affect conclusions about Vantage’s performance in extending credit to LMI borrowers.

***Residential Real Estate (HMDA) Lending***

HMDA lending by borrower income in the AA is poor when compared to the AA demographic characteristics and the performance of aggregate HMDA lenders. During the review period, the bank originated no HMDA-reportable loans to LMI borrowers in the AA. Further, the bank originated only one HMDA-reportable loan to middle-income borrowers in each of the years presented. The bank’s low lending performance may be partially attributable to limited opportunities to lend to LMI individuals, as aggregate lending data reflects a low level of lending to LMI individuals during the review period. Additionally, approximately 71 percent of the low-income population in the AA are renters, further adding to the low demand for HMDA products. A community contact indicated a significant need for affordable housing opportunities within the AA, which was exacerbated by the COVID-19 pandemic. Further, the bank is relatively new to the AA, as the bank added the El Paso Metropolitan AA to their footprint since the previous examination. Despite the numerous challenges to adequate performance in the AA, the bank’s



failure to originate a single HMDA-reportable loan to LMI individuals in the AA reflects negatively on the bank's responsiveness to the AA housing credit needs.

**Table 38**

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level													
Assessment Area: El Paso Metropolitan													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	%	#%	\$(000)	\$%	\$%	#	%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	2.1	0	0.0	1.0	0	0.0	1.1	0	0.0	0.6	22.3
Moderate	0	0.0	10.7	0	0.0	7.2	0	0.0	8.9	0	0.0	5.7	17.4
Middle	0	0.0	24.8	0	0.0	20.7	1	7.7	21.2	143	3.0	17.7	19.1
Upper	5	100.0	49.6	1,974	100.0	57.7	10	76.9	48.7	4,353	91.5	57.0	41.2
Unknown	0	0.0	12.9	0	0.0	13.4	2	15.4	20.0	262	5.5	18.9	0.0
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>1,974</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>4,758</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	1.3	0	0.0	0.5	0	0.0	1.7	0	0.0	0.8	22.3
Moderate	0	0.0	4.0	0	0.0	2.2	0	0.0	5.7	0	0.0	3.3	17.4
Middle	1	14.3	11.3	180	11.7	7.4	0	0.0	13.1	0	0.0	9.3	19.1
Upper	6	85.7	41.4	1,352	88.3	42.9	3	100.0	43.9	1,727	100.0	46.0	41.2
Unknown	0	0.0	42.0	0	0.0	47.0	0	0.0	35.6	0	0.0	40.6	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>1,532</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>1,727</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	4.5	0	0.0	2.6	0	0.0	5.0	0	0.0	3.1	22.3
Moderate	0	0.0	16.2	0	0.0	12.3	0	0.0	14.0	0	0.0	10.5	17.4
Middle	0	0.0	18.1	0	0.0	15.2	0	0.0	19.7	0	0.0	16.6	19.1
Upper	0	0.0	60.4	0	0.0	68.5	0	0.0	59.5	0	0.0	67.2	41.2
Unknown	0	0.0	0.8	0	0.0	1.3	0	0.0	1.7	0	0.0	2.5	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	1.7	0	0.0	0.8	0	0.0	1.4	0	0.0	0.7	22.3
Moderate	0	0.0	7.5	0	0.0	5.0	0	0.0	7.5	0	0.0	4.8	17.4
Middle	1	8.3	17.8	180	5.1	14.7	1	5.6	17.6	143	2.0	14.5	19.1
Upper	11	91.7	42.6	3,326	94.9	49.3	15	83.3	45.9	6,919	94.5	52.4	41.2
Unknown	0	0.0	30.5	0	0.0	30.2	2	11.1	27.5	262	3.6	27.6	0.0
<b>Total</b>	<b>12</b>	<b>100.0</b>	<b>100.0</b>	<b>3,506</b>	<b>100.0</b>	<b>100.0</b>	<b>18</b>	<b>100.0</b>	<b>100.0</b>	<b>7,324</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data													
2011-2015 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**

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. While overall lending levels were below aggregate lenders and AA businesses reporting annual revenues of \$1 million or less, a significant majority of small business loans were originated to small businesses with unknown

revenues. In 2020, 88 of the 102 small business loans originated by the bank accounted for unknown revenues and 72 of the 96 small business loans originated by the bank in 2021 had revenues that are unknown. This is due to the bank not requiring the collection of borrower revenue information on all commercial loan products. This practice, along with the bank's participation in the SBA's PPP during the review period, resulted in more than 75 percent of small business loans extended to not include revenue information. Although the 2020 and 2021 distribution of borrowers appears unfavorable to small businesses in the AA, the bank's engagement in the PPP loans indicates responsiveness to the credit needs of small businesses in the AA.

**Table 39**

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: El Paso Metropolitan													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	8	7.8	33.9	1,983	14.6	24.5	13	13.5	39.0	5,132	27.4	25.5	92.8
<b>Over \$1 Million</b>	6	5.9		2,597	19.2		11	11.5		3,217	17.2		6.5
<b>Revenue Unknown</b>	88	86.3		8,960	66.2		72	75.0		10,353	55.4		0.6
<b>Total</b>	102	100.0		13,540	100.0		96	100.0		18,702	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	63	61.8	88.0	2,890	21.3	33.5	48	50.0	92.6	2,169	11.6	39.2	
<b>\$100,001 - \$250,000</b>	25	24.5	7.1	4,114	30.4	20.7	25	26.0	4.3	4,516	24.1	17.6	
<b>\$250,001 - \$1 Million</b>	14	13.7	4.9	6,536	48.3	45.8	23	24.0	3.1	12,017	64.3	43.2	
<b>Total</b>	102	100.0	100.0	13,540	100.0	100.0	96	100.0	100.0	18,702	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	1	12.5		95	4.8		2	15.4		82	1.6		
<b>\$100,001 - \$250,000</b>	4	50.0		546	27.5		3	23.1		558	10.9		
<b>\$250,001 - \$1 Million</b>	3	37.5		1,342	67.7		8	61.5		4,492	87.5		
<b>Total</b>	8	100.0		1,983	100.0		13	100.0		5,132	100.0		
Source: 2021 FFIEC Census Data													
2021 Dun & Bradstreet Data													
2011-2015 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 community development loans in the El Paso Metropolitan AA. During the review period, the bank made two qualifying community development loans, totaling approximately \$9.7 million. The community development loans originated in the AA focused exclusively on providing revitalization and stabilization in LMI geographies. These loans were made with the community development purpose of retaining employers in LMI geographies, helping to ensure continued employment opportunities for the residents of those geographies.

**Investment Test**

The bank has an adequate level of qualified community development investments and grants, particularly those not routinely provided by private investors and is rarely in a leadership position. The bank’s community development investments benefitting the El Paso Metropolitan AA consisted of a CRA-focused mortgage-backed security. While this investment does not reflect a tailored response to identified credit needs in the AA, the activity serves a qualified community development purpose. Additionally, the bank made several donations to child crisis centers and food pantries in the AA, helping facilitate the provision of community services targeted to LMI individuals and families.

**Table 40**

Investments, Grants, and Donations Assessment Area: El Paso Metropolitan								
Community Development Purpose	Current Investments <sup>1</sup>		Prior Period Investments <sup>2</sup>		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	0	0	1	1,421	1	1	2	1,422
Community Services	0	0	0	0	6	7	6	7
<b>Total</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1,421</b>	<b>7</b>	<b>8</b>	<b>8</b>	<b>1,429</b>

<sup>1</sup> Original Market Value of Investment  
<sup>2</sup> Book Value of Investment

**Service Test**

The bank’s Service Test performance is poor. Its retail and community development services reflect poor responsiveness to the needs of the AA.

*Retail Services*

The bank’s delivery systems are accessible to the bank’s geographies and individuals of different income levels in its AA. The distribution of the bank’s three branch offices and three ATMs as of August 1, 2022 was 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 El Paso Metropolitan AA.

**Table 41**

Branch and Full-Service ATM Locations Assessment Area: El Paso Metropolitan							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full-service ATMs	
				#	%	#	%
Low	6.2	3.9	6.9	0	0.0	0	0.0
Moderate	33.5	27.3	26.9	1	33.3	1	33.3
Middle	33.6	34.5	30.7	1	33.3	0	0.0
Upper	26.1	34.3	35.0	1	33.3	2	66.7
Unknown	0.6	0.0	0.5	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>

The bank entered into the AA through the November 2018<sup>7</sup> purchase of Inter National Bank, and acquisition of three branches in the AA. The bank did not open any new branches or close any acquired branches in the AA during the review period. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI geographies. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are consistent throughout the AA.

*Community Development Services*

The bank provided no qualified community development services in the El Paso Metropolitan AA during the review period. While this is partially attributable to the bank's newness in the AA and the COVID-19 pandemic, which severely limited the opportunity for banks to provide in-person services due to quarantine and social distancing measures, the lack of services provided reflects negatively on the bank's community development service performance.

**METROPOLITAN AREAS  
(Limited-Scope Review)**

**Description of the Institution's Operations**

**Brownsville MSA Assessment Area**

- As of June 30, 2021, the bank operated one branch in the AA, representing 4.3 percent of its branches.
- As of June 30, 2021, the bank had \$28.1 million in deposits in this AA, representing a market share of 0.5 percent and 1.1 percent of the bank's total deposits.
- The Brownsville MSA AA consist of Cameron County. According to 2015 ACS data, the AA consist of 87 census tracts: zero low-income geographies (0.0 percent), 35 moderate-income census tracts (40.2 percent), 25 middle-income census tracts (28.7 percent), 24 upper-income census tracts (27.6 percent), and three (3.4 percent) census tracts with unknown income.
- There are approximately 95,991 families in the AA. By family income, approximately 24.6 percent of these families are classified as low-income, 16.6 percent are moderate-income, 15.7 percent are middle-income, and 43.0 percent are upper-income families.

**Fort Worth Metropolitan Assessment Area**

- As of June 30, 2021, the bank operated two branches in the AA, representing 8.7 percent of its branches.
- As of June 30, 2021, the bank had \$119.0 million in deposits in this AA, representing a market share of 0.2 percent and 4.8 percent of the bank's total deposits.
- The Fort Worth Metropolitan AA consist of Tarrant County. According to 2015 ACS data, the AA consist of 357 census tracts: 47 low-income census tracts (13.2 percent), 92 moderate-income census tracts (25.8 percent), 113 middle-income census tracts (31.7 percent), 104 upper-income census tracts (29.1 percent) and one (0.3 percent) census track with unknown income.
- There are approximately 466,070 families in the AA. By family income, approximately 22.9 percent of these families are classified as low-income, 16.2 percent are moderate-income, 19.3 percent are middle-income, and 41.6 percent are upper-income families.

**Laredo MSA Assessment Area**

- As of June 30, 2021, the bank operated two branches in the AA, representing 8.7 percent of its branches.
- As of June 30, 2021, the bank had \$145.2 million in deposits in this AA, representing a market share of 1.7 percent and 5.8 percent of the bank's total deposits.
- The Laredo MSA consist of Webb County. According to 2015 ACS data, the AA consist of 61 census tracts: two low-income census tracts (3.3 percent), 31 moderate-income census tracts (50.8 percent), 16 middle-income census tracts (26.2 percent), 11 upper-income census tracts (18.0 percent) and one (1.6 percent) census track with unknown income.
- There are approximately 56,626 families in the AA. By family income, approximately 25.6 percent of these families are classified as low-income, 15.4 percent are moderate-income, 16.8 percent are middle-income, and 42.3 percent are upper-income families.

**Conclusions With Respect to Performance Tests**

Vantage’s lending, investment, and service performance in the limited-scope review metropolitan AAs is consistent with its overall performance. Additional information regarding detailed demographic information and the HMDA and CRA lending for the limited-scope AAs can be found in Appendix D.

Conclusions regarding performance are as follows:

**Table 42**

<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Brownsville MSA AA	Consistent	Consistent	Consistent
Fort Worth Metropolitan AA	Consistent	Consistent	Consistent
Laredo MSA AA	Consistent	Consistent	Consistent

**NONMETROPOLITAN AREA  
(Limited-Scope Review)**

**Description of the Institution's Operations in Refugio County Nonmetropolitan Assessment Area**

- As of June 30, 2021, the bank operated one branch in the AA, representing 4.3 percent of its branches.
- As of June 30, 2021, the bank had \$46.1 million in deposits in this AA, representing a market share of 42.0 percent and 1.9 percent of the bank's total deposits.
- The Refugio County Nonmetropolitan AA consists of Refugio County. According to 2015 ACS data, the AA is comprised of two middle-income census tracts.
- There are approximately 1,916 families in the AA. By family income, approximately 24.1 percent of these families are classified as low-income, 17.0 percent are moderate-income, 16.9 percent are middle-income, and 42.1 percent are upper-income families.

**Conclusions With Respect to Performance Tests**

Vantage's lending, investment, and service performance in the AA is consistent with its overall performance. Additional information regarding detailed the AA's demographic information and the HMDA and CRA lending can be found in Appendix E.

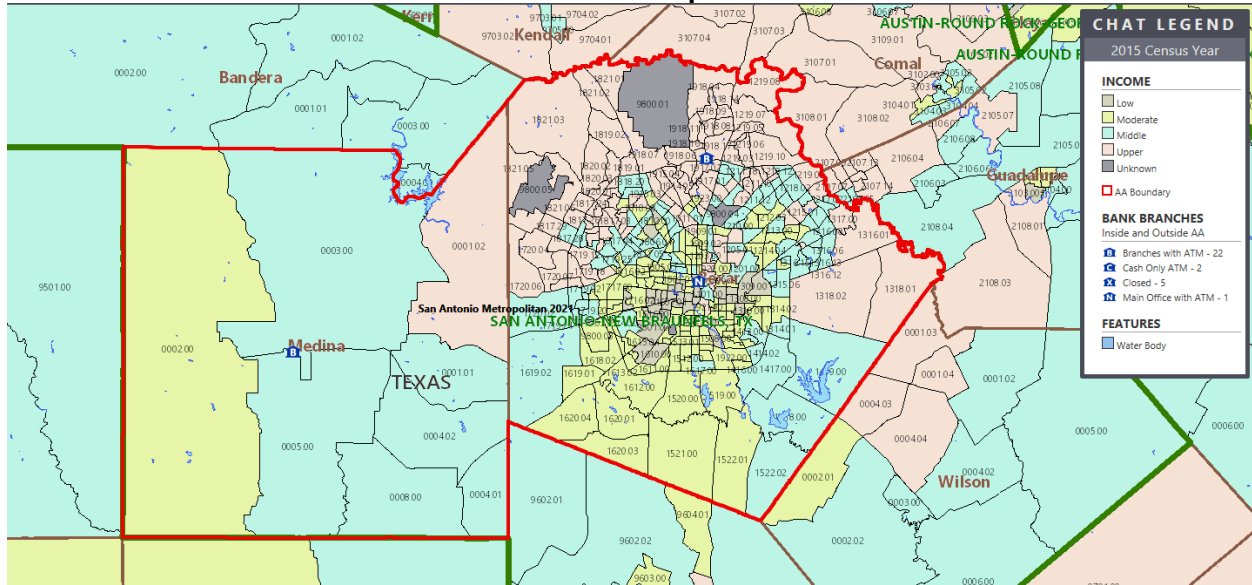
Conclusions regarding performance are as follows:

**Table 43**

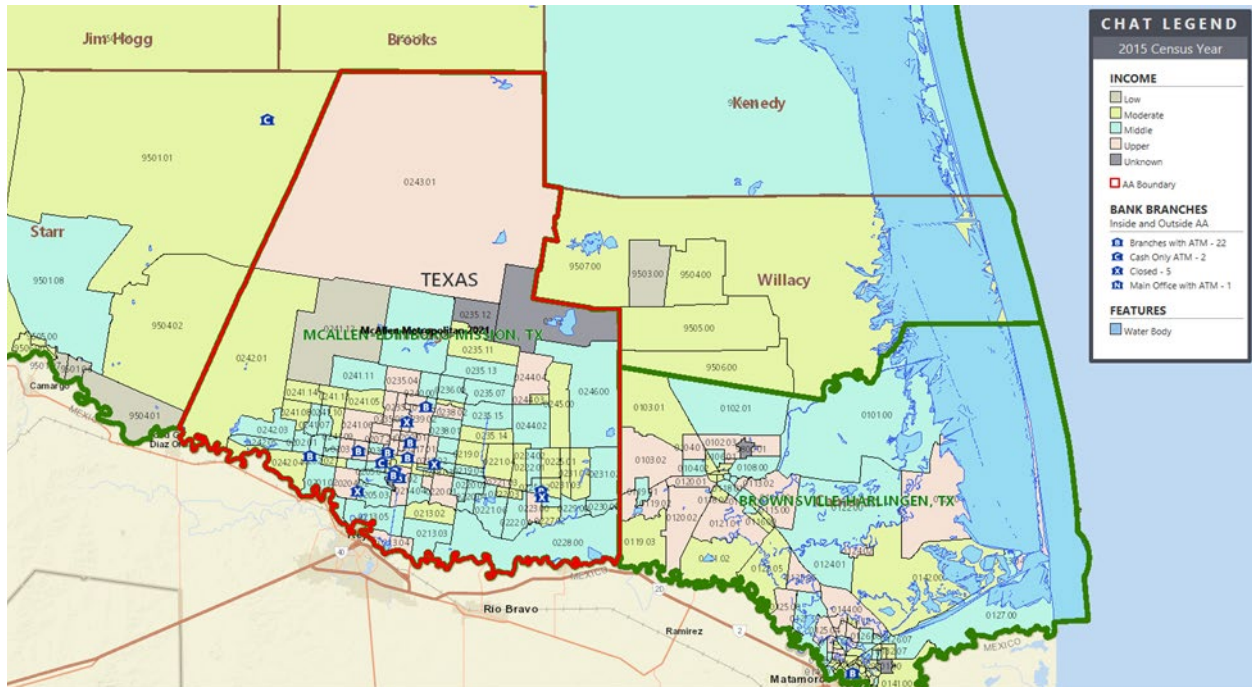
<b>Assessment Area</b>	<b>Lending Test</b>	<b>Investment Test</b>	<b>Service Test</b>
Refugio Nonmetropolitan AA	Consistent	Consistent	Consistent

APPENDIX A – MAPS OF THE ASSESSMENT AREAS

San Antonio Metropolitan AA

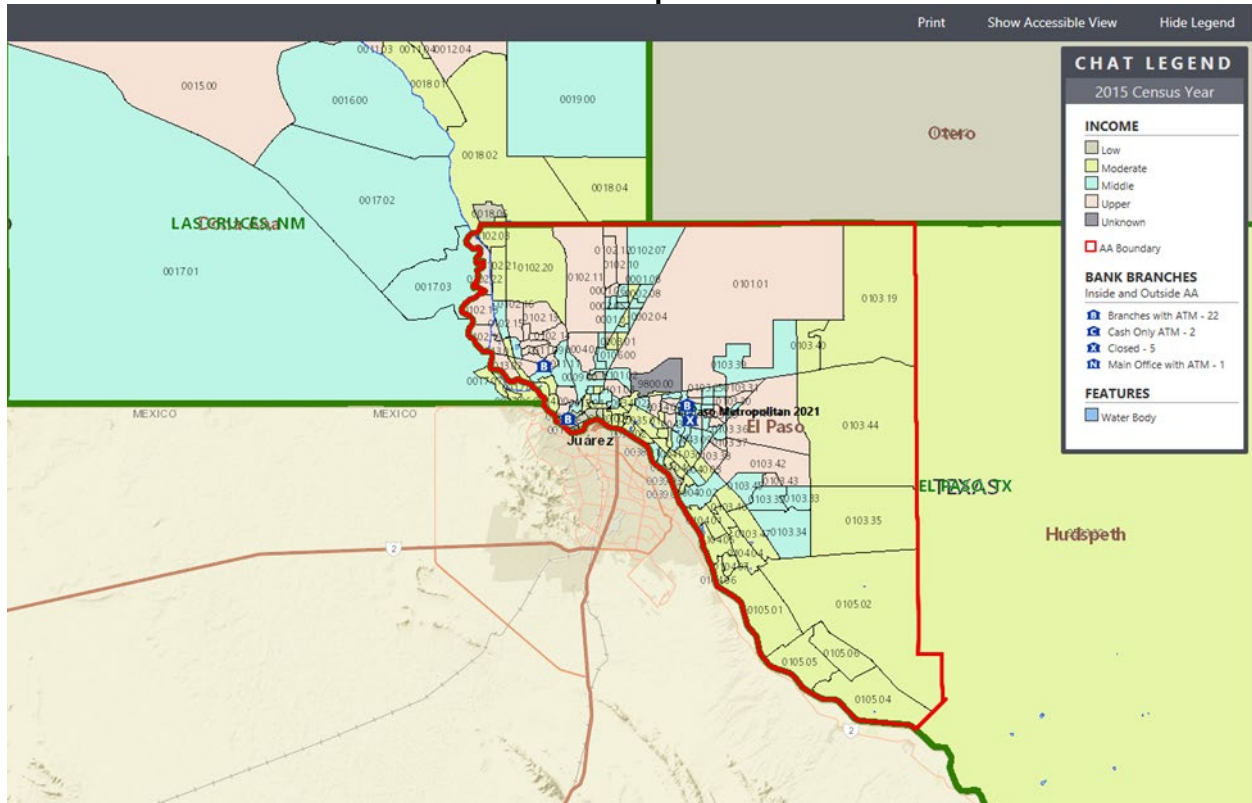


McAllen MSA AA

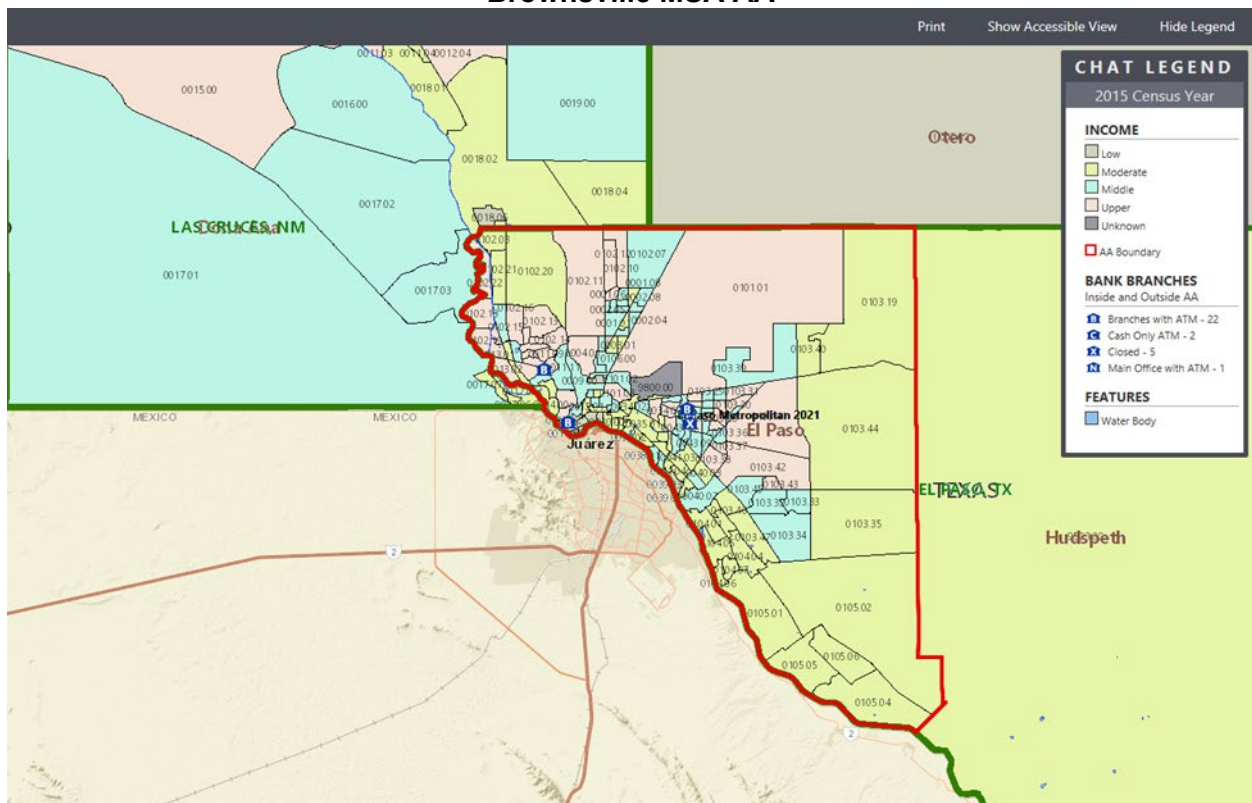




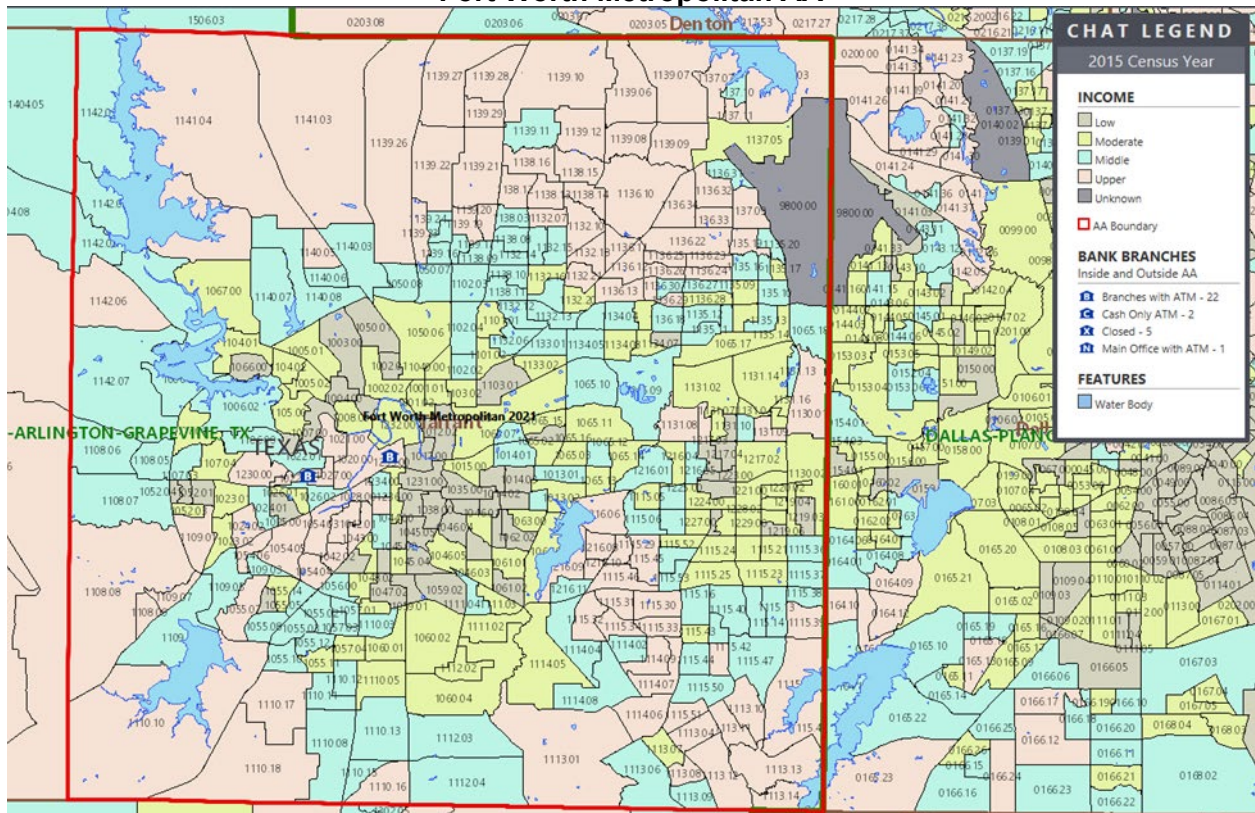
### El Paso Metropolitan AA



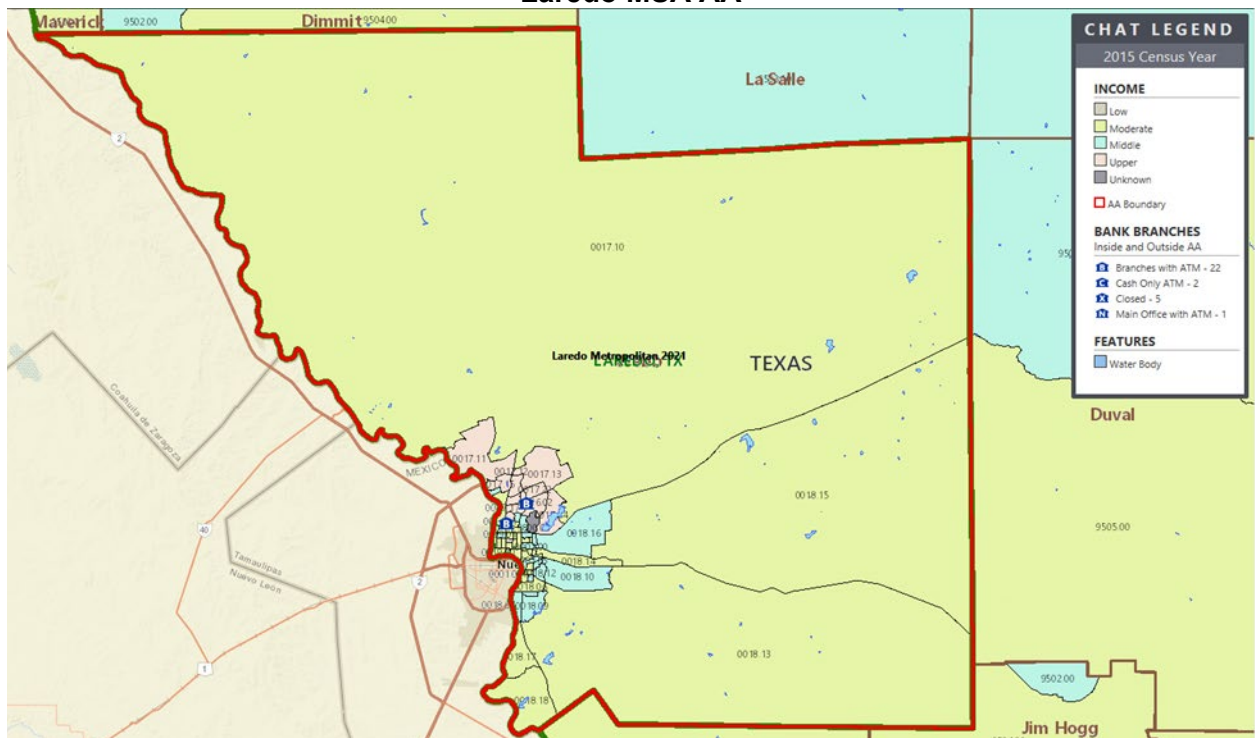
### Brownsville MSA AA

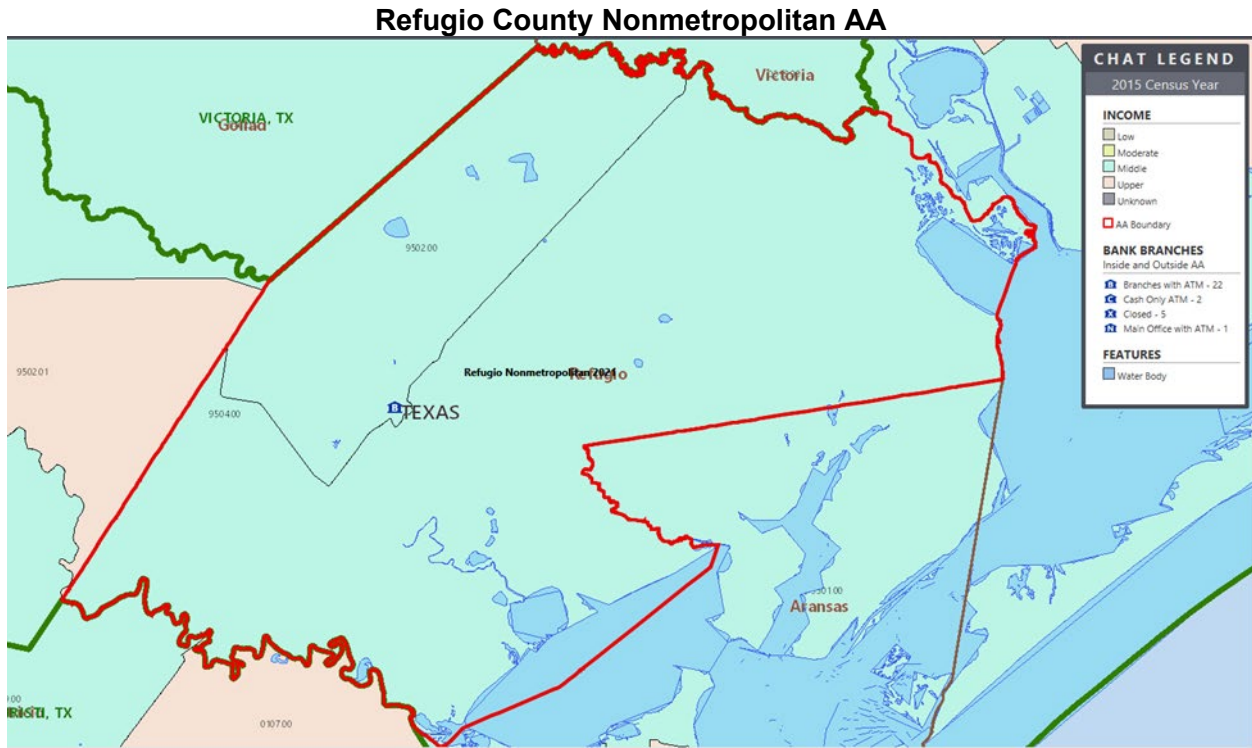


Fort Worth Metropolitan AA



Laredo MSA AA





**APPENDIX B – FULL-SCOPE ASSESSMENT AREAS DEMOGRAPHIC INFORMATION**

**Table B-1**

2020 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	33	8.8	28,586	6.6	10,764	37.7	103,436	24.0
Moderate	132	35.3	135,552	31.5	28,899	21.3	75,809	17.6
Middle	98	26.2	123,184	28.6	13,627	11.1	83,124	19.3
Upper	107	28.6	143,456	33.3	5,865	4.1	168,421	39.1
Unknown	4	1.1	12	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>374</b>	<b>100.0</b>	<b>430,790</b>	<b>100.0</b>	<b>59,155</b>	<b>13.7</b>	<b>430,790</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	47,834	19,121	5.1	40.0	22,334	46.7	6,379	13.3
Moderate	230,129	101,207	27.1	44.0	105,487	45.8	23,435	10.2
Middle	202,353	108,661	29.1	53.7	76,286	37.7	17,406	8.6
Upper	212,950	144,997	38.8	68.1	55,701	26.2	12,252	5.8
Unknown	12	12	0.0	100.0	0	0.0	0	0.0
<b>Total AA</b>	<b>693,278</b>	<b>373,998</b>	<b>100.0</b>	<b>53.9</b>	<b>259,808</b>	<b>37.5</b>	<b>59,472</b>	<b>8.6</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4,243	5.1	3,748	4.8	475	9.0	20	2.7
Moderate	19,469	23.3	18,027	23.2	1,340	25.4	102	13.7
Middle	24,176	28.9	22,290	28.7	1,708	32.4	178	24.0
Upper	35,501	42.5	33,353	43.0	1,708	32.4	440	59.2
Unknown	201	0.2	153	0.2	45	0.9	3	0.4
<b>Total AA</b>	<b>83,590</b>	<b>100.0</b>	<b>77,571</b>	<b>100.0</b>	<b>5,276</b>	<b>100.0</b>	<b>743</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.8</b>		<b>6.3</b>		<b>0.9</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	10	1.1	9	1.0	1	9.1	0	0.0
Moderate	130	13.9	129	13.9	1	9.1	0	0.0
Middle	300	32.0	294	31.7	5	45.5	1	100.0
Upper	498	53.1	494	53.3	4	36.4	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>938</b>	<b>100.0</b>	<b>926</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.7</b>		<b>1.2</b>		<b>0.1</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

**Table B-2**

**2019 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	33	8.8	28,586	6.6	10,764	37.7	103,436	24.0
Moderate	132	35.3	135,552	31.5	28,899	21.3	75,809	17.6
Middle	98	26.2	123,184	28.6	13,627	11.1	83,124	19.3
Upper	107	28.6	143,456	33.3	5,865	4.1	168,421	39.1
Unknown	4	1.1	12	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>374</b>	<b>100.0</b>	<b>430,790</b>	<b>100.0</b>	<b>59,155</b>	<b>13.7</b>	<b>430,790</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	47,834	19,121	5.1	40.0	22,334	46.7	6,379	13.3
Moderate	230,129	101,207	27.1	44.0	105,487	45.8	23,435	10.2
Middle	202,353	108,661	29.1	53.7	76,286	37.7	17,406	8.6
Upper	212,950	144,997	38.8	68.1	55,701	26.2	12,252	5.8
Unknown	12	12	0.0	100.0	0	0.0	0	0.0
<b>Total AA</b>	<b>693,278</b>	<b>373,998</b>	<b>100.0</b>	<b>53.9</b>	<b>259,808</b>	<b>37.5</b>	<b>59,472</b>	<b>8.6</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4,159	5.1	3,663	4.9	476	8.7	20	2.8
Moderate	19,070	23.3	17,605	23.3	1,366	24.9	99	13.8
Middle	23,638	28.9	21,674	28.7	1,792	32.6	172	24.1
Upper	34,645	42.4	32,412	42.9	1,812	33.0	421	58.9
Unknown	205	0.3	159	0.2	43	0.8	3	0.4
<b>Total AA</b>	<b>81,717</b>	<b>100.0</b>	<b>75,513</b>	<b>100.0</b>	<b>5,489</b>	<b>100.0</b>	<b>715</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.4</b>	<b>6.7</b>	<b>0.9</b>		
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	13	1.4	12	1.3	1	7.1	0	0.0
Moderate	126	13.1	125	13.2	1	7.1	0	0.0
Middle	302	31.4	295	31.2	6	42.9	1	100.0
Upper	521	54.2	515	54.4	6	42.9	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>962</b>	<b>100.0</b>	<b>947</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>98.4</b>	<b>1.5</b>	<b>0.1</b>		

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table B-3**

**2020 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	1	0.9	2,741	1.5	1,854	67.6	46,048	25.1
Moderate	32	28.3	48,286	26.3	21,103	43.7	29,886	16.3
Middle	46	40.7	76,106	41.5	22,358	29.4	28,262	15.4
Upper	31	27.4	55,935	30.5	9,440	16.9	79,139	43.2
Unknown	3	2.7	267	0.1	108	40.4	0	0.0
<b>Total AA</b>	<b>113</b>	<b>100.0</b>	<b>183,335</b>	<b>100.0</b>	<b>54,863</b>	<b>29.9</b>	<b>183,335</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,162	2,091	1.4	66.1	828	26.2	243	7.7
Moderate	65,913	37,566	24.6	57.0	20,071	30.5	8,276	12.6
Middle	108,000	64,456	42.3	59.7	28,114	26.0	15,430	14.3
Upper	80,442	48,068	31.5	59.8	22,371	27.8	10,003	12.4
Unknown	609	371	0.2	60.9	85	14.0	153	25.1
<b>Total AA</b>	<b>258,126</b>	<b>152,552</b>	<b>100.0</b>	<b>59.1</b>	<b>71,469</b>	<b>27.7</b>	<b>34,105</b>	<b>13.2</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	110	0.4	104	0.4	5	0.3	1	0.6
Moderate	5,430	20.0	5,045	19.9	345	22.6	40	22.5
Middle	9,225	34.0	8,636	34.0	527	34.5	62	34.8
Upper	12,295	45.4	11,576	45.6	644	42.2	75	42.1
Unknown	42	0.2	36	0.1	6	0.4	0	0.0
<b>Total AA</b>	<b>27,102</b>	<b>100.0</b>	<b>25,397</b>	<b>100.0</b>	<b>1,527</b>	<b>100.0</b>	<b>178</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.7</b>		<b>5.6</b>		<b>0.7</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6	1.8	5	1.6	1	3.6	0	0.0
Moderate	67	19.6	62	19.8	5	17.9	0	0.0
Middle	135	39.6	119	38.0	16	57.1	0	0.0
Upper	127	37.2	122	39.0	5	17.9	0	0.0
Unknown	6	1.8	5	1.6	1	3.6	0	0.0
<b>Total AA</b>	<b>341</b>	<b>100.0</b>	<b>313</b>	<b>100.0</b>	<b>28</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>91.8</b>		<b>8.2</b>		<b>0.0</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B-4**

**2019 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	1	0.9	2,741	1.5	1,854	67.6	46,048	25.1
Moderate	32	28.3	48,286	26.3	21,103	43.7	29,886	16.3
Middle	46	40.7	76,106	41.5	22,358	29.4	28,262	15.4
Upper	31	27.4	55,935	30.5	9,440	16.9	79,139	43.2
Unknown	3	2.7	267	0.1	108	40.4	0	0.0
<b>Total AA</b>	<b>113</b>	<b>100.0</b>	<b>183,335</b>	<b>100.0</b>	<b>54,863</b>	<b>29.9</b>	<b>183,335</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,162	2,091	1.4	66.1	828	26.2	243	7.7
Moderate	65,913	37,566	24.6	57.0	20,071	30.5	8,276	12.6
Middle	108,000	64,456	42.3	59.7	28,114	26.0	15,430	14.3
Upper	80,442	48,068	31.5	59.8	22,371	27.8	10,003	12.4
Unknown	609	371	0.2	60.9	85	14.0	153	25.1
<b>Total AA</b>	<b>258,126</b>	<b>152,552</b>	<b>100.0</b>	<b>59.1</b>	<b>71,469</b>	<b>27.7</b>	<b>34,105</b>	<b>13.2</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	111	0.4	104	0.4	6	0.4	1	0.6
Moderate	5,412	20.4	5,004	20.2	368	23.1	40	24.1
Middle	8,953	33.7	8,356	33.7	540	33.8	57	34.3
Upper	12,042	45.3	11,298	45.6	676	42.4	68	41.0
Unknown	41	0.2	35	0.1	6	0.4	0	0.0
<b>Total AA</b>	<b>26,559</b>	<b>100.0</b>	<b>24,797</b>	<b>100.0</b>	<b>1,596</b>	<b>100.0</b>	<b>166</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>93.4</b>		<b>6.0</b>		<b>0.6</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	5	1.5	4	1.3	1	3.7	0	0.0
Moderate	65	19.1	60	19.2	5	18.5	0	0.0
Middle	142	41.6	126	40.4	15	55.6	1	50.0
Upper	123	36.1	117	37.5	5	18.5	1	50.0
Unknown	6	1.8	5	1.6	1	3.7	0	0.0
<b>Total AA</b>	<b>341</b>	<b>100.0</b>	<b>312</b>	<b>100.0</b>	<b>27</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>			<b>91.5</b>		<b>7.9</b>		<b>0.6</b>	
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table B-5**

**2020 El Paso Metropolitan AA Demographics**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	10	6.2	7,088	3.6	3,599	50.8	43,488	22.3
Moderate	54	33.5	52,571	27.0	16,417	31.2	33,942	17.4
Middle	54	33.5	66,302	34.0	12,063	18.2	37,272	19.1
Upper	42	26.1	69,003	35.4	6,115	8.9	80,262	41.2
Unknown	1	0.6	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>161</b>	<b>100.0</b>	<b>194,964</b>	<b>100.0</b>	<b>38,194</b>	<b>19.6</b>	<b>194,964</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	12,489	2,952	1.8	23.6	7,990	64.0	1,547	12.4
Moderate	78,104	39,452	24.7	50.5	31,449	40.3	7,203	9.2
Middle	96,399	53,077	33.2	55.1	35,828	37.2	7,494	7.8
Upper	95,624	64,166	40.2	67.1	24,698	25.8	6,760	7.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>282,616</b>	<b>159,647</b>	<b>100.0</b>	<b>56.5</b>	<b>99,965</b>	<b>35.4</b>	<b>23,004</b>	<b>8.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,951	7.0	1,697	6.5	239	12.6	15	9.6
Moderate	7,565	27.0	6,809	26.2	718	37.9	38	24.2
Middle	8,628	30.8	8,034	30.9	547	28.9	47	29.9
Upper	9,747	34.8	9,333	35.9	359	18.9	55	35.0
Unknown	136	0.5	102	0.4	32	1.7	2	1.3
<b>Total AA</b>	<b>28,027</b>	<b>100.0</b>	<b>25,975</b>	<b>100.0</b>	<b>1,895</b>	<b>100.0</b>	<b>157</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>92.7</b>		<b>6.8</b>		<b>0.6</b>	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	5	3.4	4	2.8	1	14.3	0	0.0
Moderate	59	39.6	55	38.7	4	57.1	0	0.0
Middle	23	15.4	22	15.5	1	14.3	0	0.0
Upper	61	40.9	61	43.0	0	0.0	0	0.0
Unknown	1	0.7	0	0.0	1	14.3	0	0.0
<b>Total AA</b>	<b>149</b>	<b>100.0</b>	<b>142</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>95.3</b>		<b>4.7</b>		<b>0.0</b>	
<p>Source: 2020 FFIEC Census Data                  2020 Dun &amp; Bradstreet Data                  2011-2015 U.S. Census Bureau: American Community Survey                  Note: Percentages may not total 100.0 percent due to rounding.</p>								



**Table B-6**

**2019 El Paso Metropolitan AA Demographics**

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	10	6.2	7,088	3.6	3,599	50.8	43,488	22.3
Moderate	54	33.5	52,571	27.0	16,417	31.2	33,942	17.4
Middle	54	33.5	66,302	34.0	12,063	18.2	37,272	19.1
Upper	42	26.1	69,003	35.4	6,115	8.9	80,262	41.2
Unknown	1	0.6	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>161</b>	<b>100.0</b>	<b>194,964</b>	<b>100.0</b>	<b>38,194</b>	<b>19.6</b>	<b>194,964</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	12,489	2,952	1.8	23.6	7,990	64.0	1,547	12.4
Moderate	78,104	39,452	24.7	50.5	31,449	40.3	7,203	9.2
Middle	96,399	53,077	33.2	55.1	35,828	37.2	7,494	7.8
Upper	95,624	64,166	40.2	67.1	24,698	25.8	6,760	7.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>282,616</b>	<b>159,647</b>	<b>100.0</b>	<b>56.5</b>	<b>99,965</b>	<b>35.4</b>	<b>23,004</b>	<b>8.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,928	7.0	1,686	6.7	227	11.8	15	9.6
Moderate	7,437	27.1	6,661	26.3	732	37.9	44	28.0
Middle	8,434	30.8	7,833	30.9	563	29.2	38	24.2
Upper	9,484	34.6	9,046	35.7	380	19.7	58	36.9
Unknown	122	0.4	92	0.4	28	1.5	2	1.3
<b>Total AA</b>	<b>27,405</b>	<b>100.0</b>	<b>25,318</b>	<b>100.0</b>	<b>1,930</b>	<b>100.0</b>	<b>157</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.4</b>		<b>7.0</b>		<b>0.6</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4	2.6	3	2.1	1	12.5	0	0.0
Moderate	62	40.5	58	40.0	4	50.0	0	0.0
Middle	23	15.0	21	14.5	2	25.0	0	0.0
Upper	63	41.2	63	43.4	0	0.0	0	0.0
Unknown	1	0.7	0	0.0	1	12.5	0	0.0
<b>Total AA</b>	<b>153</b>	<b>100.0</b>	<b>145</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>94.8</b>		<b>5.2</b>		<b>0.0</b>

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX C – FULL-SCOPE ASSESSMENT AREAS LENDING TABLES

San Antonio Metropolitan AA – 2019  
Table C-1

Distribution of 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: San Antonio Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	1.6	0	0.0	1.0	5.1
Moderate	1	25.0	14.6	112	6.5	9.9	27.1
Middle	0	0.0	33.8	0	0.0	28.2	29.1
Upper	3	75.0	50.0	1,602	93.5	60.8	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>1,714</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	1.7	0	0.0	1.1	5.1
Moderate	0	0.0	15.0	0	0.0	9.1	27.1
Middle	1	100.0	28.9	80	100.0	22.6	29.1
Upper	0	0.0	54.3	0	0.0	67.3	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	3.2	0	0.0	2.4	5.1
Moderate	0	0.0	20.0	0	0.0	14.5	27.1
Middle	0	0.0	24.2	0	0.0	18.9	29.1
Upper	0	0.0	52.6	0	0.0	64.2	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	9.9	0	0.0	5.5	7.1
Moderate	0	0.0	38.9	0	0.0	32.4	38.7
Middle	0	0.0	30.5	0	0.0	27.9	30.4
Upper	1	100.0	20.6	1,669	100.0	34.2	23.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>1,669</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	1.7	0	0.0	1.5	5.1
Moderate	2	28.6	15.4	179	5.1	12.0	27.1
Middle	1	14.3	32.4	80	2.3	27.0	29.1
Upper	4	57.1	50.5	3,271	92.7	59.5	38.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>3,530</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

**Table C-2**

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Assessment Area: San Antonio Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	3.1	0	0.0	1.5	24.0
Moderate	0	0.0	16.3	0	0.0	11.1	17.6
Middle	1	25.0	24.6	112	6.5	21.5	19.3
Upper	1	25.0	38.0	700	40.8	47.9	39.1
Unknown	2	50.0	18.0	902	52.6	18.0	0.0
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>1,714</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	5.3	0	0.0	2.6	24.0
Moderate	1	100.0	10.1	80	100.0	5.5	17.6
Middle	0	0.0	15.9	0	0.0	11.1	19.3
Upper	0	0.0	35.5	0	0.0	40.8	39.1
Unknown	0	0.0	33.2	0	0.0	40.0	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>80</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	7.9	0	0.0	4.6	24.0
Moderate	0	0.0	13.4	0	0.0	10.3	17.6
Middle	0	0.0	23.6	0	0.0	18.2	19.3
Upper	0	0.0	52.8	0	0.0	63.7	39.1
Unknown	0	0.0	2.4	0	0.0	3.2	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	0	0.0	3.7	0	0.0	1.8	24.0
Moderate	1	16.7	14.3	80	4.3	9.6	17.6
Middle	1	16.7	21.7	112	6.0	18.6	19.3
Upper	2	33.3	36.8	767	41.2	45.7	39.1
Unknown	2	33.3	23.5	902	48.5	24.2	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>1,861</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2019 FFIEC Census Data							
2011-2015 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-3**

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: San Antonio Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
Low	3	2.9	4.6	1,318	4.5	6.2	5.1
Moderate	17	16.3	22.0	5,238	18.0	22.3	23.3
Middle	34	32.7	26.7	8,052	27.7	27.3	28.9
Upper	50	48.1	45.1	14,449	49.7	43.3	42.4
Unknown	0	0.0	0.3	0	0.0	0.2	0.3
<b>Total</b>	<b>104</b>	<b>100.0</b>	<b>100.0</b>	<b>29,057</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

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

**Table C-4**

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: San Antonio Metropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	\$%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	41	39.4	42.7	10,556	36.3	30.8	92.4
<b>Over \$1 Million</b>	48	46.2		15,189	52.3		6.7
<b>Revenue Unknown</b>	15	14.4		3,312	11.4		0.9
<b>Total</b>	<b>104</b>	<b>100.0</b>		<b>29,057</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	40	38.5	93.4	2,141	7.4	38.0	
<b>\$100,001 - \$250,000</b>	22	21.2	3.4	4,224	14.5	15.1	
<b>\$250,001 - \$1 Million</b>	42	40.4	3.3	22,692	78.1	46.9	
<b>Total</b>	<b>104</b>	<b>100.0</b>	<b>100.0</b>	<b>29,057</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	21	51.2		1,104	10.5		
<b>\$100,001 - \$250,000</b>	6	14.6		1,181	11.2		
<b>\$250,001 - \$1 Million</b>	14	34.1		8,271	78.4		
<b>Total</b>	<b>41</b>	<b>100.0</b>		<b>10,556</b>	<b>100.0</b>		

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

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

McAllen MSA AA – 2019  
Table C-5

Distribution of 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: McAllen MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	1	1.4	0.2	216	1.4	0.2	1.4
Moderate	10	13.5	13.4	1,284	8.4	11.3	24.6
Middle	25	33.8	37.0	4,463	29.0	34.2	42.3
Upper	38	51.4	49.1	9,406	61.2	54.2	31.5
Unknown	0	0.0	0.2	0	0.0	0.2	0.2
<b>Total</b>	<b>74</b>	<b>100.0</b>	<b>100.0</b>	<b>15,369</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.8	0	0.0	0.8	1.4
Moderate	2	10.0	14.0	230	8.9	12.6	24.6
Middle	6	30.0	35.5	581	22.6	33.4	42.3
Upper	12	60.0	49.5	1,760	68.5	53.0	31.5
Unknown	0	0.0	0.1	0	0.0	0.1	0.2
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>2,571</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.1	0	0.0	1.1	1.4
Moderate	0	0.0	14.9	0	0.0	15.2	24.6
Middle	0	0.0	36.0	0	0.0	37.3	42.3
Upper	0	0.0	47.4	0	0.0	45.9	31.5
Unknown	0	0.0	0.6	0	0.0	0.5	0.2
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	1.8	0	0.0	0.2	0.4
Moderate	2	66.7	19.6	689	25.6	25.0	20.1
Middle	1	33.3	37.5	2,000	74.4	32.2	33.2
Upper	0	0.0	41.1	0	0.0	42.6	46.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>2,689</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	1	1.0	0.4	216	1.0	0.3	1.4
Moderate	15	15.0	13.6	2,333	11.1	13.0	24.6
Middle	32	32.0	36.7	7,044	33.6	33.8	42.3
Upper	52	52.0	49.2	11,393	54.3	52.7	31.5
Unknown	0	0.0	0.2	0	0.0	0.1	0.2
<b>Total</b>	<b>100</b>	<b>100.0</b>	<b>100.0</b>	<b>20,986</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table C-6**

**Distribution of 2019 Home Mortgage Lending By Borrower Income Level  
Assessment Area: McAllen MSA**

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.3	0	0.0	0.2	25.1
Moderate	2	2.7	4.2	203	1.3	2.4	16.3
Middle	12	16.2	14.5	1,413	9.2	10.7	15.4
Upper	58	78.4	62.3	13,413	87.3	68.6	43.2
Unknown	2	2.7	18.7	340	2.2	18.1	0.0
<b>Total</b>	<b>74</b>	<b>100.0</b>	<b>100.0</b>	<b>15,369</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	1	5.0	1.2	56	2.2	0.7	25.1
Moderate	1	5.0	4.1	74	2.9	1.9	16.3
Middle	2	10.0	10.0	189	7.4	6.7	15.4
Upper	16	80.0	61.8	2,252	87.6	64.4	43.2
Unknown	0	0.0	23.0	0	0.0	26.3	0.0
<b>Total</b>	<b>20</b>	<b>100.0</b>	<b>100.0</b>	<b>2,571</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.6	0	0.0	0.1	25.1
Moderate	0	0.0	10.9	0	0.0	6.3	16.3
Middle	0	0.0	10.9	0	0.0	9.3	15.4
Upper	0	0.0	75.4	0	0.0	83.2	43.2
Unknown	0	0.0	2.3	0	0.0	1.1	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	1	1.0	0.6	56	0.3	0.3	25.1
Moderate	3	3.1	4.2	277	1.5	2.3	16.3
Middle	14	14.4	12.9	1,602	8.8	9.4	15.4
Upper	77	79.4	60.4	16,022	87.6	66.1	43.2
Unknown	2	2.1	22.0	340	1.9	21.9	0.0
<b>Total</b>	<b>97</b>	<b>100.0</b>	<b>100.0</b>	<b>18,297</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data

2011-2015 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-7**

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: McAllen MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Low	1	0.6	0.5	40	0.1	0.3	0.4
Moderate	27	15.1	18.3	5,221	11.1	18.3	20.4
Middle	69	38.5	34.1	20,697	44.2	36.7	33.7
Upper	82	45.8	44.9	20,910	44.6	43.6	45.3
Unknown	0	0.0	0.2	0	0.0	0.1	0.2
<b>Total</b>	<b>179</b>	<b>100.0</b>	<b>100.0</b>	<b>46,868</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table C-8**

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: McAllen MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	79	44.1	38.7	20,328	43.4	34.6	93.4
<b>Over \$1 Million</b>	48	26.8		16,431	35.1		6.0
<b>Revenue Unknown</b>	52	29.1		10,109	21.6		0.6
<b>Total</b>	<b>179</b>	<b>100.0</b>		<b>46,868</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	60	33.5	94.0	3,261	7.0	43.7	
<b>\$100,001 - \$250,000</b>	52	29.1	3.6	8,728	18.6	18.2	
<b>\$250,001 - \$1 Million</b>	67	37.4	2.4	34,879	74.4	38.1	
<b>Total</b>	<b>179</b>	<b>100.0</b>	<b>100.0</b>	<b>46,868</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	24	30.4		1,326	6.5		
<b>\$100,001 - \$250,000</b>	24	30.4		3,874	19.1		
<b>\$250,001 - \$1 Million</b>	31	39.2		15,128	74.4		
<b>Total</b>	<b>79</b>	<b>100.0</b>		<b>20,328</b>	<b>100.0</b>		

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**El Paso Metropolitan AA – 2019  
Table C-9**

Distribution of 2019 Home Mortgage Lending By Income Level of Geography Assessment Area: El Paso Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.6	0	0.0	0.4	1.8
Moderate	2	33.3	13.8	384	39.7	11.7	24.7
Middle	1	16.7	27.6	71	7.3	23.3	33.2
Upper	3	50.0	58.1	512	52.9	64.6	40.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>967</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.6	0	0.0	0.3	1.8
Moderate	0	0.0	11.4	0	0.0	8.2	24.7
Middle	0	0.0	28.5	0	0.0	22.6	33.2
Upper	2	100.0	59.5	350	100.0	69.0	40.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>350</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	1.3	0	0.0	1.0	1.8
Moderate	0	0.0	19.5	0	0.0	19.4	24.7
Middle	0	0.0	33.3	0	0.0	28.5	33.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	4.4	0	0.0	1.0	12.3
Moderate	0	0.0	44.4	0	0.0	52.3	32.8
Middle	0	0.0	20.0	0	0.0	31.6	31.3
Upper	0	0.0	31.1	0	0.0	15.2	23.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.6	0	0.0	0.4	1.8
Moderate	2	25.0	13.6	384	29.2	12.7	24.7
Middle	1	12.5	28.3	71	5.4	23.7	33.2
Upper	5	62.5	57.5	862	65.5	63.2	40.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>1,317</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							



**Table C-10**

**Distribution of 2019 Home Mortgage Lending By Borrower Income Level  
Assessment Area: El Paso Metropolitan**

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	2.2	0	0.0	1.0	22.3
Moderate	0	0.0	10.9	0	0.0	7.0	17.4
Middle	0	0.0	23.9	0	0.0	19.7	19.1
Upper	6	100.0	48.8	967	100.0	58.1	41.2
Unknown	0	0.0	14.2	0	0.0	14.2	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>967</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	4.4	0	0.0	2.3	22.3
Moderate	0	0.0	8.5	0	0.0	4.5	17.4
Middle	0	0.0	15.0	0	0.0	9.9	19.1
Upper	2	100.0	45.0	350	100.0	48.5	41.2
Unknown	0	0.0	27.0	0	0.0	34.7	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>350</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	8.0	0	0.0	4.9	22.3
Moderate	0	0.0	12.3	0	0.0	9.0	17.4
Middle	0	0.0	18.5	0	0.0	18.1	19.1
Upper	0	0.0	60.8	0	0.0	67.2	41.2
Unknown	0	0.0	0.5	0	0.0	0.8	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	0	0.0	2.8	0	0.0	1.4	22.3
Moderate	0	0.0	10.0	0	0.0	6.3	17.4
Middle	0	0.0	20.9	0	0.0	17.2	19.1
Upper	8	100.0	46.5	1,317	100.0	54.8	41.2
Unknown	0	0.0	19.7	0	0.0	20.4	0.0
<b>Total</b>	<b>8</b>	<b>100.0</b>	<b>100.0</b>	<b>1,317</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data

2011-2015 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-11**

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: El Paso Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	6	12.5	6.1	1,648	12.2	6.2	7.0
Moderate	14	29.2	28.9	2,604	19.2	32.1	27.1
Middle	12	25.0	28.2	3,099	22.8	27.2	30.8
Upper	16	33.3	35.1	6,212	45.8	32.8	34.6
Unknown	0	0.0	0.4	0	0.0	0.7	0.4
Tract-Unk	0	0.0	1.4	0	0.0	0.9	
<b>Total</b>	<b>48</b>	<b>100.0</b>	<b>100.0</b>	<b>13,563</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

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

**Table C-12**

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: El Paso Metropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	16	33.3	42.7	6,314	46.6	34.6	92.4
<b>Over \$1 Million</b>	8	16.7		2,385	17.6		7.0
<b>Revenue Unknown</b>	24	50.0		4,864	35.9		0.6
<b>Total</b>	<b>48</b>	<b>100.0</b>		<b>13,563</b>	<b>100.0</b>		<b>100.0</b>
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	20	41.7	93.7	1,152	8.5	39.0	
<b>\$100,001 - \$250,000</b>	12	25.0	3.4	1,928	14.2	16.4	
<b>\$250,001 - \$1 Million</b>	16	33.3	2.9	10,483	77.3	44.6	
<b>Total</b>	<b>48</b>	<b>100.0</b>	<b>100.0</b>	<b>13,563</b>	<b>100.0</b>	<b>100.0</b>	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	4	25.0		280	4.4		
<b>\$100,001 - \$250,000</b>	4	25.0		686	10.9		
<b>\$250,001 - \$1 Million</b>	8	50.0		5,348	84.7		
<b>Total</b>	<b>16</b>	<b>100.0</b>		<b>6,314</b>	<b>100.0</b>		

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey

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

**APPENDIX D – METROPOLITAN LIMITED-SCOPE ASSESSMENT AREAS**

**Appendix D-1  
Table D-1**

2021 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	0	0.0	0	0.0	0	0.0	23,636	24.6
Moderate	35	40.2	31,176	32.5	13,235	42.5	15,934	16.6
Middle	25	28.7	29,773	31.0	8,861	29.8	15,109	15.7
Upper	24	27.6	35,042	36.5	6,280	17.9	41,312	43.0
Unknown	3	3.4	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>87</b>	<b>100.0</b>	<b>95,991</b>	<b>100.0</b>	<b>28,376</b>	<b>29.6</b>	<b>95,991</b>	<b>100.0</b>
	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	43,679	23,552	29.1	53.9	15,266	35.0	4,861	11.1
Middle	43,828	24,219	29.9	55.3	13,684	31.2	5,925	13.5
Upper	57,687	33,114	40.9	57.4	11,262	19.5	13,311	23.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>145,194</b>	<b>80,885</b>	<b>100.0</b>	<b>55.7</b>	<b>40,212</b>	<b>27.7</b>	<b>24,097</b>	<b>16.6</b>
	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	3,685	30.3	3,439	30.4	223	30.1	23	22.3
Middle	3,435	28.2	3,115	27.5	294	39.6	26	25.2
Upper	5,029	41.3	4,752	42.0	223	30.1	54	52.4
Unknown	14	0.1	12	0.1	2	0.3	0	0.0
<b>Total AA</b>	<b>12,163</b>	<b>100.0</b>	<b>11,318</b>	<b>100.0</b>	<b>742</b>	<b>100.0</b>	<b>103</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.1</b>		<b>6.1</b>		<b>0.8</b>
	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	41	22.2	39	21.9	1	16.7	1	100.0
Middle	56	30.3	55	30.9	1	16.7	0	0.0
Upper	88	47.6	84	47.2	4	66.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>185</b>	<b>100.0</b>	<b>178</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>96.2</b>		<b>3.2</b>		<b>0.5</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D-2**

2020 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	0	0.0	0	0.0	0	0.0	23,636	24.6
Moderate	35	40.2	31,176	32.5	13,235	42.5	15,934	16.6
Middle	25	28.7	29,773	31.0	8,861	29.8	15,109	15.7
Upper	24	27.6	35,042	36.5	6,280	17.9	41,312	43.0
Unknown	3	3.4	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>87</b>	<b>100.0</b>	<b>95,991</b>	<b>100.0</b>	<b>28,376</b>	<b>29.6</b>	<b>95,991</b>	<b>100.0</b>
	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	43,679	23,552	29.1	53.9	15,266	35.0	4,861	11.1
Middle	43,828	24,219	29.9	55.3	13,684	31.2	5,925	13.5
Upper	57,687	33,114	40.9	57.4	11,262	19.5	13,311	23.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>145,194</b>	<b>80,885</b>	<b>100.0</b>	<b>55.7</b>	<b>40,212</b>	<b>27.7</b>	<b>24,097</b>	<b>16.6</b>
	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	3,682	30.3	3,431	30.4	228	29.5	23	22.8
Middle	3,398	28.0	3,072	27.3	301	38.9	25	24.8
Upper	5,047	41.6	4,752	42.2	242	31.3	53	52.5
Unknown	16	0.1	14	0.1	2	0.3	0	0.0
<b>Total AA</b>	<b>12,143</b>	<b>100.0</b>	<b>11,269</b>	<b>100.0</b>	<b>773</b>	<b>100.0</b>	<b>101</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.8</b>		<b>6.4</b>		<b>0.8</b>
	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	45	22.4	43	22.2	1	16.7	1	100.0
Middle	63	31.3	62	32.0	1	16.7	0	0.0
Upper	93	46.3	89	45.9	4	66.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>201</b>	<b>100.0</b>	<b>194</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>				<b>96.5</b>		<b>3.0</b>		<b>0.5</b>
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D-3**

2019 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	0	0.0	0	0.0	0	0.0	23,636	24.6
Moderate	35	40.2	31,176	32.5	13,235	42.5	15,934	16.6
Middle	25	28.7	29,773	31.0	8,861	29.8	15,109	15.7
Upper	24	27.6	35,042	36.5	6,280	17.9	41,312	43.0
Unknown	3	3.4	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>87</b>	<b>100.0</b>	<b>95,991</b>	<b>100.0</b>	<b>28,376</b>	<b>29.6</b>	<b>95,991</b>	<b>100.0</b>
	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	43,679	23,552	29.1	53.9	15,266	35.0	4,861	11.1
Middle	43,828	24,219	29.9	55.3	13,684	31.2	5,925	13.5
Upper	57,687	33,114	40.9	57.4	11,262	19.5	13,311	23.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>145,194</b>	<b>80,885</b>	<b>100.0</b>	<b>55.7</b>	<b>40,212</b>	<b>27.7</b>	<b>24,097</b>	<b>16.6</b>
	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	3,642	30.7	3,380	30.7	242	30.3	20	22.5
Middle	3,312	27.9	2,981	27.1	310	38.8	21	23.6
Upper	4,909	41.3	4,614	42.0	247	30.9	48	53.9
Unknown	18	0.2	17	0.2	1	0.1	0	0.0
<b>Total AA</b>	<b>11,881</b>	<b>100.0</b>	<b>10,992</b>	<b>100.0</b>	<b>800</b>	<b>100.0</b>	<b>89</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>					<b>92.5</b>		<b>6.7</b>	
	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	45	21.5	43	21.4	1	14.3	1	100.0
Middle	65	31.1	63	31.3	2	28.6	0	0.0
Upper	99	47.4	95	47.3	4	57.1	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>209</b>	<b>100.0</b>	<b>201</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>
<b>Percentage of Total Farms:</b>					<b>96.2</b>		<b>0.5</b>	
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D-4**

**Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography  
Assessment Area: Brownsville MSA**

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
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	11.4	0	0.0	9.2	1	7.7	14.3	109	2.3	10.9	29.1
Middle	1	6.7	24.8	62	1.5	21.5	1	7.7	25.0	33	0.7	22.8	29.9
Upper	14	93.3	63.8	3,970	98.5	69.3	11	84.6	60.7	4,686	97.1	66.2	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>4,032</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>4,828</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
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	10.2	0	0.0	9.6	0	0.0	10.8	0	0.0	10.0	29.1
Middle	0	0.0	23.1	0	0.0	20.7	1	50.0	24.6	232	27.9	23.1	29.9
Upper	1	100.0	66.7	303	100.0	69.6	1	50.0	64.5	600	72.1	66.9	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>303</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>832</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
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	19.2	0	0.0	15.7	0	0.0	16.4	0	0.0	10.6	29.1
Middle	0	0.0	32.7	0	0.0	35.7	0	0.0	23.6	0	0.0	16.9	29.9
Upper	0	0.0	48.1	0	0.0	48.6	0	0.0	60.0	0	0.0	72.4	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>													<b>Multi-family Units %</b>
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	18.4	0	0.0	7.7	1	100.0	27.0	375	100.0	55.6	23.8
Middle	0	0.0	44.7	0	0.0	64.6	0	0.0	54.1	0	0.0	29.8	27.2
Upper	0	0.0	36.8	0	0.0	27.8	0	0.0	18.9	0	0.0	14.7	49.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>375</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													<b>Owner Occupied Units %</b>
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	11.7	0	0.0	9.6	2	12.5	13.1	484	8.0	12.7	29.1
Middle	1	6.3	24.5	62	1.4	23.6	2	12.5	25.0	265	4.4	23.2	29.9
Upper	15	93.8	63.8	4,273	98.6	66.9	12	75.0	61.9	5,286	87.6	64.1	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>4,335</b>	<b>100.0</b>	<b>100.0</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>6,035</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

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

**Table D-5**

**Distribution of 2019 Home Mortgage Lending By Income Level of Geography  
Assessment Area: Brownsville MSA**

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	17.6	12.9	312	10.1	10.0	29.1
Middle	1	5.9	25.6	351	11.4	23.1	29.9
Upper	13	76.5	61.6	2,414	78.5	66.8	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>3,077</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	13.7	0	0.0	13.8	29.1
Middle	0	0.0	26.9	0	0.0	22.9	29.9
Upper	2	100.0	59.4	479	100.0	63.3	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>479</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	14.3	0	0.0	13.2	29.1
Middle	0	0.0	23.8	0	0.0	20.4	29.9
Upper	0	0.0	61.9	0	0.0	66.4	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	26.9	0	0.0	25.8	23.8
Middle	0	0.0	44.2	0	0.0	54.5	27.2
Upper	0	0.0	28.8	0	0.0	19.6	49.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	15.8	13.5	312	8.8	12.8	29.1
Middle	1	5.3	26.0	351	9.9	26.7	29.9
Upper	15	78.9	60.4	2,893	81.4	60.6	40.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>3,556</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

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

**Table D-6**

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Brownsville MSA													
Geographic Income Level	Bank And Aggregate Loans By Year											Total Businesses %	
	2020						2021						
	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	11	19.3	28.8	2,214	33.3	27.3	9	20.5	29.4	2,761	23.0	28.2	30.3
Middle	22	38.6	28.5	1,756	26.4	30.3	14	31.8	28.8	4,146	34.5	33.0	28.2
Upper	24	42.1	41.8	2,680	40.3	41.2	21	47.7	40.7	5,109	42.5	37.9	41.3
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.3	0.1
<b>Total</b>	<b>57</b>	<b>100.0</b>	<b>100.0</b>	<b>6,650</b>	<b>100.0</b>	<b>100.0</b>	<b>44</b>	<b>100.0</b>	<b>100.0</b>	<b>12,016</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table D-7**

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Brownsville MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	6	26.1	27.4	1,909	27.9	25.8	30.7
Middle	8	34.8	28.3	2,317	33.8	33.5	27.9
Upper	9	39.1	41.9	2,622	38.3	39.1	41.3
Unknown	0	0.0	0.2	0	0.0	0.2	0.2
<b>Total</b>	<b>23</b>	<b>100.0</b>	<b>100.0</b>	<b>6,848</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.



Appendix D-2  
Table D-8

Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Brownsville MSA													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	1.0	0	0.0	0.5	0	0.0	0.4	0	0.0	0.2	24.6
Moderate	1	6.7	9.4	120	3.0	5.4	0	0.0	5.4	0	0.0	3.0	16.6
Middle	2	13.3	19.0	232	5.8	15.0	1	7.7	15.2	125	2.6	11.0	15.7
Upper	6	40.0	58.8	1,484	36.8	66.7	6	46.2	54.3	3,059	63.4	62.0	43.0
Unknown	6	40.0	11.8	2,196	54.5	12.4	6	46.2	24.6	1,644	34.1	23.8	0.0
<b>Total</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>4,032</b>	<b>100.0</b>	<b>100.0</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>4,828</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.7	0	0.0	0.3	0	0.0	0.7	0	0.0	0.3	24.6
Moderate	0	0.0	3.7	0	0.0	1.8	0	0.0	4.3	0	0.0	2.3	16.6
Middle	0	0.0	10.4	0	0.0	6.9	0	0.0	11.2	0	0.0	7.6	15.7
Upper	1	100.0	52.1	303	100.0	56.2	1	50.0	54.8	232	27.9	58.5	43.0
Unknown	0	0.0	33.0	0	0.0	34.8	1	50.0	29.1	600	72.1	31.3	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>303</b>	<b>100.0</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>832</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	1.9	0	0.0	1.9	0	0.0	1.8	0	0.0	1.0	24.6
Moderate	0	0.0	9.6	0	0.0	6.2	0	0.0	16.4	0	0.0	11.0	16.6
Middle	0	0.0	17.3	0	0.0	15.2	0	0.0	3.6	0	0.0	5.8	15.7
Upper	0	0.0	71.2	0	0.0	76.7	0	0.0	78.2	0	0.0	82.3	43.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	0.9	0	0.0	0.4	0	0.0	0.5	0	0.0	0.3	24.6
Moderate	1	6.3	6.6	120	2.8	3.9	0	0.0	5.1	0	0.0	2.8	16.6
Middle	2	12.5	14.3	232	5.4	11.3	1	6.7	13.4	125	2.2	9.8	15.7
Upper	7	43.8	51.2	1,787	41.2	59.6	7	46.7	53.8	3,291	58.1	60.4	43.0
Unknown	6	37.5	27.0	2,196	50.7	24.9	7	46.7	27.2	2,244	39.6	26.8	0.0
<b>Total</b>	<b>16</b>	<b>100.0</b>	<b>100.0</b>	<b>4,335</b>	<b>100.0</b>	<b>100.0</b>	<b>15</b>	<b>100.0</b>	<b>100.0</b>	<b>5,660</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
Source: 2021 FFIEC Census Data													
2011-2015 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-9**

**Distribution of 2019 Home Mortgage Lending By Borrower Income Level  
Assessment Area: Brownsville MSA**

Borrower Income Level	Bank And Aggregate Loans					Families by Family Income %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
<b>Home Purchase Loans</b>							
Low	0	0.0	0.9	0	0.0	0.5	24.6
Moderate	1	5.9	7.8	86	2.8	4.3	16.6
Middle	1	5.9	16.3	138	4.5	11.9	15.7
Upper	14	82.4	59.7	2,809	91.3	68.2	43.0
Unknown	1	5.9	15.3	44	1.4	15.1	0.0
<b>Total</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>3,077</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	1.2	0	0.0	0.7	24.6
Moderate	0	0.0	6.1	0	0.0	2.8	16.6
Middle	1	50.0	12.5	60	12.5	8.1	15.7
Upper	1	50.0	55.7	419	87.5	60.3	43.0
Unknown	0	0.0	24.4	0	0.0	28.1	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>479</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	2.4	0	0.0	0.9	24.6
Moderate	0	0.0	11.9	0	0.0	8.1	16.6
Middle	0	0.0	14.3	0	0.0	11.0	15.7
Upper	0	0.0	66.7	0	0.0	59.7	43.0
Unknown	0	0.0	4.8	0	0.0	20.4	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	0	0.0	1.0	0	0.0	0.5	24.6
Moderate	1	5.3	7.4	86	2.4	4.0	16.6
Middle	2	10.5	14.7	198	5.6	10.7	15.7
Upper	15	78.9	56.5	3,228	90.8	64.6	43.0
Unknown	1	5.3	20.4	44	1.2	20.3	0.0
<b>Total</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>3,556</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data

2011-2015 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-10**

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Brownsville MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	7	12.3	33.8	2,254	33.9	30.1	16	36.4	35.0	6,922	57.6	33.4	93.1
<b>Over \$1 Million</b>	4	7.0		1,320	19.8		2	4.5		1,458	12.1		6.1
<b>Revenue Unknown</b>	46	80.7		3,076	46.3		26	59.1		3,636	30.3		0.8
<b>Total</b>	57	100.0		6,650	100.0		44	100.0		12,016	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	40	70.2	90.9	1,396	21.0	41.9	21	47.7	93.3	865	7.2	45.2	
<b>\$100,001 - \$250,000</b>	10	17.5	5.9	1,719	25.8	22.0	4	9.1	4.2	816	6.8	19.7	
<b>\$250,001 - \$1 Million</b>	7	12.3	3.3	3,535	53.2	36.1	19	43.2	2.5	10,335	86.0	35.1	
<b>Total</b>	57	100.0	100.0	6,650	100.0	100.0	44	100.0	100.0	12,016	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	2	28.6		115	5.1		2	12.5		165	2.4		
<b>\$100,001 - \$250,000</b>	2	28.6		298	13.2		3	18.8		637	9.2		
<b>\$250,001 - \$1 Million</b>	3	42.9		1,841	81.7		11	68.8		6,120	88.4		
<b>Total</b>	7	100.0		2,254	100.0		16	100.0		6,922	100.0		
Source: 2021 FFIEC Census Data													
2021 Dun & Bradstreet Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table D-11**

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Brownsville MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	12	52.2	37.0	3,996	58.4	37.7	92.5
<b>Over \$1 Million</b>	9	39.1		2,844	41.5		6.7
<b>Revenue Unknown</b>	2	8.7		8	0.1		0.7
<b>Total</b>	23	100.0		6,848	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	5	21.7	94.3	240	3.5	46.5	
<b>\$100,001 - \$250,000</b>	6	26.1	3.3	1,049	15.3	17.4	
<b>\$250,001 - \$1 Million</b>	12	52.2	2.3	5,559	81.2	36.1	
<b>Total</b>	23	100.0	100.0	6,848	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	1	8.3		65	1.6		
<b>\$100,001 - \$250,000</b>	5	41.7		899	22.5		
<b>\$250,001 - \$1 Million</b>	6	50.0		3,032	75.9		
<b>Total</b>	12	100.0		3,996	100.0		
<i>Source: 2019 FFIEC Census Data 2019 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

Appendix D-3  
Table D-12

2021 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	2	3.3	1,184	2.1	714	60.3	14,475	25.6
Moderate	31	50.8	22,081	39.0	8,901	40.3	8,711	15.4
Middle	16	26.2	17,503	30.9	4,627	26.4	9,498	16.8
Upper	11	18.0	15,858	28.0	1,321	8.3	23,942	42.3
Unknown	1	1.6	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>61</b>	<b>100.0</b>	<b>56,626</b>	<b>100.0</b>	<b>15,563</b>	<b>27.5</b>	<b>56,626</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,733	502	1.1	29.0	1,037	59.8	194	11.2
Moderate	32,676	14,836	33.8	45.4	13,321	40.8	4,519	13.8
Middle	21,617	13,946	31.7	64.5	6,332	29.3	1,339	6.2
Upper	20,705	14,649	33.3	70.8	5,045	24.4	1,011	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>76,731</b>	<b>43,933</b>	<b>100.0</b>	<b>57.3</b>	<b>25,735</b>	<b>33.5</b>	<b>7,063</b>	<b>9.2</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	78	0.8	71	0.8	6	0.7	1	1.5
Moderate	3,058	32.2	2,731	31.8	302	35.4	25	38.5
Middle	1,639	17.2	1,531	17.8	100	11.7	8	12.3
Upper	4,688	49.3	4,220	49.1	438	51.4	30	46.2
Unknown	40	0.4	33	0.4	6	0.7	1	1.5
<b>Total AA</b>	<b>9,503</b>	<b>100.0</b>	<b>8,586</b>	<b>100.0</b>	<b>852</b>	<b>100.0</b>	<b>65</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.4</b>		<b>9.0</b>		<b>0.7</b>
	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	26	28.0	25	27.8	1	33.3	0	0.0
Middle	17	18.3	16	17.8	1	33.3	0	0.0
Upper	50	53.8	49	54.4	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>93</b>	<b>100.0</b>	<b>90</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>96.8</b>		<b>3.2</b>		<b>0.0</b>
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D-13**

**2020 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	2	3.3	1,184	2.1	714	60.3	14,475	25.6
Moderate	31	50.8	22,081	39.0	8,901	40.3	8,711	15.4
Middle	16	26.2	17,503	30.9	4,627	26.4	9,498	16.8
Upper	11	18.0	15,858	28.0	1,321	8.3	23,942	42.3
Unknown	1	1.6	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>61</b>	<b>100.0</b>	<b>56,626</b>	<b>100.0</b>	<b>15,563</b>	<b>27.5</b>	<b>56,626</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,733	502	1.1	29.0	1,037	59.8	194	11.2
Moderate	32,676	14,836	33.8	45.4	13,321	40.8	4,519	13.8
Middle	21,617	13,946	31.7	64.5	6,332	29.3	1,339	6.2
Upper	20,705	14,649	33.3	70.8	5,045	24.4	1,011	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>76,731</b>	<b>43,933</b>	<b>100.0</b>	<b>57.3</b>	<b>25,735</b>	<b>33.5</b>	<b>7,063</b>	<b>9.2</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	76	0.8	68	0.8	7	0.8	1	1.7
Moderate	3,019	32.5	2,690	32.2	307	35.7	22	37.3
Middle	1,627	17.5	1,517	18.1	103	12.0	7	11.9
Upper	4,524	48.7	4,056	48.5	439	51.0	29	49.2
Unknown	39	0.4	34	0.4	5	0.6	0	0.0
<b>Total AA</b>	<b>9,285</b>	<b>100.0</b>	<b>8,365</b>	<b>100.0</b>	<b>861</b>	<b>100.0</b>	<b>59</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>90.1</b>		<b>9.3</b>		<b>0.6</b>
	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	27	29.0	26	28.6	1	50.0	0	0.0
Middle	16	17.2	16	17.6	0	0.0	0	0.0
Upper	50	53.8	49	53.8	1	50.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>93</b>	<b>100.0</b>	<b>91</b>	<b>100.0</b>	<b>2</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>97.8</b>		<b>2.2</b>		<b>0.0</b>

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table D-14**

**2019 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	2	3.3	1,184	2.1	714	60.3	14,475	25.6
Moderate	31	50.8	22,081	39.0	8,901	40.3	8,711	15.4
Middle	16	26.2	17,503	30.9	4,627	26.4	9,498	16.8
Upper	11	18.0	15,858	28.0	1,321	8.3	23,942	42.3
Unknown	1	1.6	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>61</b>	<b>100.0</b>	<b>56,626</b>	<b>100.0</b>	<b>15,563</b>	<b>27.5</b>	<b>56,626</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,733	502	1.1	29.0	1,037	59.8	194	11.2
Moderate	32,676	14,836	33.8	45.4	13,321	40.8	4,519	13.8
Middle	21,617	13,946	31.7	64.5	6,332	29.3	1,339	6.2
Upper	20,705	14,649	33.3	70.8	5,045	24.4	1,011	4.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>76,731</b>	<b>43,933</b>	<b>100.0</b>	<b>57.3</b>	<b>25,735</b>	<b>33.5</b>	<b>7,063</b>	<b>9.2</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	73	0.8	63	0.8	9	1.0	1	1.6
Moderate	2,962	32.7	2,624	32.3	315	35.8	23	35.9
Middle	1,601	17.7	1,492	18.4	99	11.3	10	15.6
Upper	4,387	48.4	3,906	48.1	451	51.3	30	46.9
Unknown	39	0.4	34	0.4	5	0.6	0	0.0
<b>Total AA</b>	<b>9,062</b>	<b>100.0</b>	<b>8,119</b>	<b>100.0</b>	<b>879</b>	<b>100.0</b>	<b>64</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>89.6</b>		<b>9.7</b>		<b>0.7</b>
	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	27	28.4	26	28.3	1	33.3	0	0.0
Middle	19	20.0	18	19.6	1	33.3	0	0.0
Upper	49	51.6	48	52.2	1	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>95</b>	<b>100.0</b>	<b>92</b>	<b>100.0</b>	<b>3</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>96.8</b>		<b>3.2</b>		<b>0.0</b>

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table D-15**

**Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography  
Assessment Area: Laredo MSA**

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	0.2	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	1.1
Moderate	3	13.6	18.1	804	14.0	14.5	8	42.1	18.7	980	26.8	14.6	33.8
Middle	6	27.3	27.6	796	13.8	22.0	3	15.8	29.3	480	13.1	23.7	31.7
Upper	13	59.1	54.1	4,152	72.2	63.4	8	42.1	51.9	2,202	60.1	61.6	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>5,752</b>	<b>100.0</b>	<b>100.0</b>	<b>19</b>	<b>100.0</b>	<b>100.0</b>	<b>3,662</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	1.1
Moderate	1	14.3	11.8	133	9.3	9.3	1	4.8	12.5	318	8.5	10.1	33.8
Middle	0	0.0	18.3	0	0.0	13.3	8	38.1	22.5	922	24.6	17.2	31.7
Upper	6	85.7	69.7	1,294	90.7	77.2	12	57.1	64.8	2,514	67.0	72.6	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>1,427</b>	<b>100.0</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>100.0</b>	<b>3,754</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.3	0	0.0	0.7	0	0.0	2.9	0	0.0	1.0	1.1
Moderate	0	0.0	18.2	0	0.0	13.6	0	0.0	20.0	0	0.0	15.6	33.8
Middle	0	0.0	31.8	0	0.0	38.5	0	0.0	8.6	0	0.0	6.6	31.7
Upper	0	0.0	47.7	0	0.0	47.2	0	0.0	68.6	0	0.0	76.8	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>												<b>Multi-family Units %</b>	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	2.9	0	0.0	0.2	2.0
Moderate	0	0.0	39.1	0	0.0	13.5	0	0.0	70.6	0	0.0	32.0	43.7
Middle	0	0.0	30.4	0	0.0	12.2	1	100.0	14.7	336	100.0	4.1	22.8
Upper	0	0.0	30.4	0	0.0	74.2	0	0.0	11.8	0	0.0	63.7	31.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>336</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>												<b>Owner Occupied Units %</b>	
Low	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.1	1.1
Moderate	5	16.1	16.1	1,003	13.4	12.8	9	22.0	16.8	1,298	16.7	14.1	33.8
Middle	6	19.4	25.5	796	10.6	19.1	12	29.3	26.8	1,738	22.4	20.5	31.7
Upper	20	64.5	58.2	5,696	76.0	68.0	20	48.8	56.2	4,716	60.8	65.3	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>7,495</b>	<b>100.0</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>100.0</b>	<b>7,752</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

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



**Table D-16**

**Distribution of 2019 Home Mortgage Lending By Income Level of Geography  
Assessment Area: Laredo MSA**

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	0.2	0	0.0	0.1	1.1
Moderate	3	13.6	21.1	1,016	13.8	17.6	33.8
Middle	1	4.5	29.8	182	2.5	24.2	31.7
Upper	18	81.8	48.9	6,164	83.7	58.0	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>7,362</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	1.1
Moderate	1	14.3	15.0	142	7.9	11.9	33.8
Middle	2	28.6	25.1	215	11.9	17.8	31.7
Upper	4	57.1	59.9	1,444	80.2	70.3	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>1,801</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	1.1
Moderate	0	0.0	42.9	0	0.0	33.8	33.8
Middle	0	0.0	20.4	0	0.0	11.4	31.7
Upper	0	0.0	36.7	0	0.0	54.8	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	0.0	0	0.0	0.0	2.0
Moderate	0	0.0	31.8	0	0.0	6.1	43.7
Middle	0	0.0	22.7	0	0.0	12.1	22.8
Upper	0	0.0	45.5	0	0.0	81.9	31.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	0.1	0	0.0	0.1	1.1
Moderate	5	16.1	19.9	1,228	13.1	15.8	33.8
Middle	3	9.7	29.5	397	4.2	22.5	31.7
Upper	23	74.2	50.5	7,734	82.6	61.6	33.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>9,359</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

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

**Table D-17**

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Laredo MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	0	0.0	0.8	0	0.0	0.4	0	0.0	0.7	0	0.0	0.2	0.8
Moderate	30	24.6	31.0	8,006	29.8	31.7	14	20.0	29.3	2,964	20.9	32.1	32.2
Middle	8	6.6	14.1	2,622	9.8	9.3	10	14.3	15.5	1,799	12.7	10.1	17.2
Upper	84	68.9	53.5	16,218	60.4	58.0	46	65.7	53.8	9,420	66.4	57.1	49.3
Unknown	0	0.0	0.3	0	0.0	0.3	0	0.0	0.2	0	0.0	0.2	0.4
<b>Total</b>	122	100.0	100.0	26,846	100.0	100.0	70	100.0	100.0	14,183	100.0	100.0	100.0

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table D-18**

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Laredo MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	1	2.3	0.7	90	0.7	0.3	0.8
Moderate	14	32.6	30.9	5,725	44.2	30.0	32.7
Middle	1	2.3	15.0	86	0.7	10.2	17.7
Upper	27	62.8	52.2	7,060	54.5	58.7	48.4
Unknown	0	0.0	0.3	0	0.0	0.4	0.4
<b>Total</b>	43	100.0	100.0	12,961	100.0	100.0	100.0

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table D-19**  
**Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level**  
**Assessment Area: Laredo MSA**

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
<b>Low</b>	1	4.5	1.3	73	1.3	0.6	1	5.3	1.6	113	3.1	0.8	25.6
<b>Moderate</b>	1	4.5	12.2	130	2.3	8.3	4	21.1	11.9	604	16.5	8.3	15.4
<b>Middle</b>	4	18.2	25.7	657	11.4	22.5	3	15.8	24.3	468	12.8	21.8	16.8
<b>Upper</b>	14	63.6	47.8	4,628	80.5	55.6	11	57.9	37.2	2,477	67.6	46.3	42.3
<b>Unknown</b>	2	9.1	13.0	264	4.6	12.9	0	0.0	25.1	0	0.0	22.9	0.0
<b>Total</b>	22	100.0	100.0	5,752	100.0	100.0	19	100.0	100.0	3,662	100.0	100.0	100.0
<b>Refinance Loans</b>													
<b>Low</b>	0	0.0	0.8	0	0.0	0.3	0	0.0	1.1	0	0.0	0.6	25.6
<b>Moderate</b>	1	14.3	3.0	150	10.5	1.6	2	9.5	4.9	141	3.8	2.9	15.4
<b>Middle</b>	1	14.3	9.8	135	9.5	6.8	2	9.5	13.1	385	10.3	9.8	16.8
<b>Upper</b>	5	71.4	52.0	1,142	80.0	54.8	15	71.4	47.0	3,038	80.9	51.3	42.3
<b>Unknown</b>	0	0.0	34.4	0	0.0	36.6	2	9.5	33.8	190	5.1	35.4	0.0
<b>Total</b>	7	100.0	100.0	1,427	100.0	100.0	21	100.0	100.0	3,754	100.0	100.0	100.0
<b>Home Improvement Loans</b>													
<b>Low</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	25.6
<b>Moderate</b>	0	0.0	13.6	0	0.0	11.4	0	0.0	8.6	0	0.0	5.0	15.4
<b>Middle</b>	0	0.0	13.6	0	0.0	15.3	0	0.0	14.3	0	0.0	15.4	16.8
<b>Upper</b>	0	0.0	72.7	0	0.0	73.3	0	0.0	77.1	0	0.0	79.7	42.3
<b>Unknown</b>	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
<b>Total Home Mortgage Loans</b>													
<b>Low</b>	1	3.2	1.0	73	1.0	0.5	1	2.5	1.4	113	1.5	0.7	25.6
<b>Moderate</b>	2	6.5	7.6	280	3.7	5.4	6	15.0	9.0	745	10.0	6.3	15.4
<b>Middle</b>	5	16.1	17.1	792	10.6	15.4	5	12.5	19.4	853	11.5	17.2	16.8
<b>Upper</b>	21	67.7	43.1	6,086	81.2	51.1	26	65.0	39.8	5,515	74.4	47.2	42.3
<b>Unknown</b>	2	6.5	31.1	264	3.5	27.6	2	5.0	30.4	190	2.6	28.6	0.0
<b>Total</b>	31	100.0	100.0	7,495	100.0	100.0	40	100.0	100.0	7,416	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 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-20**

**Distribution of 2019 Home Mortgage Lending By Borrower Income Level**  
**Assessment Area: Laredo MSA**

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	1.3	0	0.0	1.0	25.6
Moderate	1	4.5	5.7	78	1.1	3.2	15.4
Middle	1	4.5	15.3	167	2.3	11.9	16.8
Upper	19	86.4	62.2	6,487	88.1	69.3	42.3
Unknown	1	4.5	15.5	630	8.6	14.7	0.0
<b>Total</b>	<b>22</b>	<b>100.0</b>	<b>100.0</b>	<b>7,362</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	1.8	0	0.0	0.9	25.6
Moderate	0	0.0	2.1	0	0.0	1.0	15.4
Middle	2	28.6	8.9	234	13.0	5.2	16.8
Upper	5	71.4	60.3	1,567	87.0	61.9	42.3
Unknown	0	0.0	26.9	0	0.0	30.9	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>1,801</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	6.1	0	0.0	3.2	25.6
Moderate	0	0.0	4.1	0	0.0	2.2	15.4
Middle	0	0.0	10.2	0	0.0	4.8	16.8
Upper	0	0.0	73.5	0	0.0	79.0	42.3
Unknown	0	0.0	6.1	0	0.0	10.8	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	0	0.0	1.5	0	0.0	0.9	25.6
Moderate	1	3.2	4.6	78	0.8	2.7	15.4
Middle	3	9.7	13.3	401	4.3	10.2	16.8
Upper	26	83.9	58.4	8,250	88.2	65.5	42.3
Unknown	1	3.2	22.3	630	6.7	20.6	0.0
<b>Total</b>	<b>31</b>	<b>100.0</b>	<b>100.0</b>	<b>9,359</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data

2011-2015 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-21**

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Laredo MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	18	14.8	39.1	8,869	33.0	29.0	4	5.7	42.1	900	6.3	34.9	90.4
<b>Over \$1 Million</b>	13	10.7		4,636	17.3		11	15.7		6,323	44.6		9.0
<b>Revenue Unknown</b>	91	74.6		13,341	49.7		55	78.6		6,960	49.1		0.7
<b>Total</b>	122	100.0		26,846	100.0		70	100.0		14,183	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	56	45.9	84.3	2,503	9.3	32.1	37	52.9	87.3	1,568	11.1	33.1	
<b>\$100,001 - \$250,000</b>	32	26.2	9.8	5,227	19.5	24.1	15	21.4	7.9	2,465	17.4	23.5	
<b>\$250,001 - \$1 Million</b>	34	27.9	5.9	19,116	71.2	43.8	18	25.7	4.8	10,150	71.6	43.5	
<b>Total</b>	122	100.0	100.0	26,846	100.0	100.0	70	100.0	100.0	14,183	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	2	11.1		96	1.1		2	50.0		120	13.3		
<b>\$100,001 - \$250,000</b>	3	16.7		489	5.5		0	0.0		0	0.0		
<b>\$250,001 - \$1 Million</b>	13	72.2		8,284	93.4		2	50.0		780	86.7		
<b>Total</b>	18	100.0		8,869	100.0		4	100.0		900	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.													

**Table D-22**

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Laredo MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	21	48.8	44.6	6,687	51.6	37.6	89.6
<b>Over \$1 Million</b>	13	30.2		5,671	43.8		9.7
<b>Revenue Unknown</b>	9	20.9		603	4.7		0.7
<b>Total</b>	43	100.0		12,961	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	13	30.2	88.7	858	6.6	33.6	
<b>\$100,001 - \$250,000</b>	13	30.2	6.2	2,289	17.7	19.2	
<b>\$250,001 - \$1 Million</b>	17	39.5	5.0	9,814	75.7	47.2	
<b>Total</b>	43	100.0	100.0	12,961	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	3	14.3		250	3.7		
<b>\$100,001 - \$250,000</b>	10	47.6		1,815	27.1		
<b>\$250,001 - \$1 Million</b>	8	38.1		4,622	69.1		
<b>Total</b>	21	100.0		6,687	100.0		
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.							

**Appendix D-4  
Table D-23**

2021 Fort Worth Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	47	13.2	39,666	8.5	14,651	36.9	106,853	22.9
Moderate	92	25.8	105,020	22.5	20,519	19.5	75,485	16.2
Middle	113	31.7	153,821	33.0	13,025	8.5	89,879	19.3
Upper	104	29.1	167,563	36.0	5,684	3.4	193,853	41.6
Unknown	1	0.3	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>357</b>	<b>100.0</b>	<b>466,070</b>	<b>100.0</b>	<b>53,879</b>	<b>11.6</b>	<b>466,070</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	73,353	21,537	5.2	29.4	40,992	55.9	10,824	14.8
Moderate	179,506	77,148	18.8	43.0	83,981	46.8	18,377	10.2
Middle	242,240	141,409	34.4	58.4	84,570	34.9	16,261	6.7
Upper	237,874	170,392	41.5	71.6	53,708	22.6	13,774	5.8
Unknown	12	0	0.0	0.0	0	0.0	12	100.0
<b>Total AA</b>	<b>732,985</b>	<b>410,486</b>	<b>100.0</b>	<b>56.0</b>	<b>263,251</b>	<b>35.9</b>	<b>59,248</b>	<b>8.1</b>
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	7,340	6.9	6,614	6.6	660	10.6	66	6.0
Moderate	22,494	21.0	20,468	20.6	1,865	30.0	161	14.6
Middle	30,236	28.3	28,579	28.7	1,412	22.7	245	22.2
Upper	46,683	43.7	43,812	44.0	2,241	36.0	630	57.1
Unknown	127	0.1	82	0.1	44	0.7	1	0.1
<b>Total AA</b>	<b>106,880</b>	<b>100.0</b>	<b>99,555</b>	<b>100.0</b>	<b>6,222</b>	<b>100.0</b>	<b>1,103</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>93.1</b>	<b>5.8</b>		<b>1.0</b>	
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	19	2.6	18	2.5	1	8.3	0	0.0
Moderate	83	11.4	83	11.6	0	0.0	0	0.0
Middle	178	24.5	175	24.5	3	25.0	0	0.0
Upper	447	61.5	439	61.4	8	66.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>727</b>	<b>100.0</b>	<b>715</b>	<b>100.0</b>	<b>12</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.3</b>	<b>1.7</b>		<b>0.0</b>	
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

**Table D-24**

2020 Fort Worth Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	47	13.2	39,666	8.5	14,651	36.9	106,853	22.9
Moderate	92	25.8	105,020	22.5	20,519	19.5	75,485	16.2
Middle	113	31.7	153,821	33.0	13,025	8.5	89,879	19.3
Upper	104	29.1	167,563	36.0	5,684	3.4	193,853	41.6
Unknown	1	0.3	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>357</b>	<b>100.0</b>	<b>466,070</b>	<b>100.0</b>	<b>53,879</b>	<b>11.6</b>	<b>466,070</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	73,353	21,537	5.2	29.4	40,992	55.9	10,824	14.8
Moderate	179,506	77,148	18.8	43.0	83,981	46.8	18,377	10.2
Middle	242,240	141,409	34.4	58.4	84,570	34.9	16,261	6.7
Upper	237,874	170,392	41.5	71.6	53,708	22.6	13,774	5.8
Unknown	12	0	0.0	0.0	0	0.0	12	100.0
<b>Total AA</b>	<b>732,985</b>	<b>410,486</b>	<b>100.0</b>	<b>56.0</b>	<b>263,251</b>	<b>35.9</b>	<b>59,248</b>	<b>8.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	7,162	6.8	6,454	6.6	656	10.3	52	4.9
Moderate	22,161	21.1	20,105	20.6	1,907	30.1	149	14.0
Middle	29,693	28.3	27,988	28.7	1,463	23.1	242	22.8
Upper	45,816	43.7	42,926	44.0	2,272	35.8	618	58.2
Unknown	126	0.1	83	0.1	42	0.7	1	0.1
<b>Total AA</b>	<b>104,958</b>	<b>100.0</b>	<b>97,556</b>	<b>100.0</b>	<b>6,340</b>	<b>100.0</b>	<b>1,062</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.9</b>		<b>6.0</b>		<b>1.0</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	19	2.5	18	2.4	1	9.1	0	0.0
Moderate	85	11.4	85	11.5	0	0.0	0	0.0
Middle	189	25.3	188	25.5	1	9.1	0	0.0
Upper	455	60.8	446	60.5	9	81.8	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>748</b>	<b>100.0</b>	<b>737</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.5</b>		<b>1.5</b>		<b>0.0</b>

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.



**Table D-25**

2019 Fort Worth Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	47	13.2	39,666	8.5	14,651	36.9	106,853	22.9
Moderate	92	25.8	105,020	22.5	20,519	19.5	75,485	16.2
Middle	113	31.7	153,821	33.0	13,025	8.5	89,879	19.3
Upper	104	29.1	167,563	36.0	5,684	3.4	193,853	41.6
Unknown	1	0.3	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>357</b>	<b>100.0</b>	<b>466,070</b>	<b>100.0</b>	<b>53,879</b>	<b>11.6</b>	<b>466,070</b>	<b>100.0</b>
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	73,353	21,537	5.2	29.4	40,992	55.9	10,824	14.8
Moderate	179,506	77,148	18.8	43.0	83,981	46.8	18,377	10.2
Middle	242,240	141,409	34.4	58.4	84,570	34.9	16,261	6.7
Upper	237,874	170,392	41.5	71.6	53,708	22.6	13,774	5.8
Unknown	12	0	0.0	0.0	0	0.0	12	100.0
<b>Total AA</b>	<b>732,985</b>	<b>410,486</b>	<b>100.0</b>	<b>56.0</b>	<b>263,251</b>	<b>35.9</b>	<b>59,248</b>	<b>8.1</b>
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	6,973	6.8	6,257	6.6	664	10.3	52	4.9
Moderate	21,808	21.3	19,712	20.8	1,950	30.4	146	13.8
Middle	28,964	28.3	27,242	28.7	1,471	22.9	251	23.7
Upper	44,431	43.4	41,528	43.8	2,295	35.8	608	57.5
Unknown	111	0.1	74	0.1	36	0.6	1	0.1
<b>Total AA</b>	<b>102,287</b>	<b>100.0</b>	<b>94,813</b>	<b>100.0</b>	<b>6,416</b>	<b>100.0</b>	<b>1,058</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>92.7</b>		<b>6.3</b>		<b>1.0</b>
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	18	2.4	17	2.3	1	7.1	0	0.0
Moderate	90	12.0	89	12.1	1	7.1	0	0.0
Middle	205	27.4	204	27.8	1	7.1	0	0.0
Upper	435	58.2	424	57.8	11	78.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>748</b>	<b>100.0</b>	<b>734</b>	<b>100.0</b>	<b>14</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>98.1</b>		<b>1.9</b>		<b>0.0</b>

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table D-26**

**Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography  
Assessment Area: Fort Worth Metropolitan**

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	2.9	0	0.0	1.8	0	0.0	3.6	0	0.0	2.2	5.2
Moderate	2	28.6	14.1	302	3.0	11.0	0	0.0	16.4	0	0.0	12.6	18.8
Middle	2	28.6	36.9	5,260	51.9	31.3	1	9.1	34.0	140	2.7	28.7	34.4
Upper	3	42.9	46.1	4,570	45.1	55.8	10	90.9	45.9	4,955	97.3	56.5	41.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>10,132</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>5,095</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	1.1	0	0.0	0.7	0	0.0	1.5	0	0.0	0.9	5.2
Moderate	1	25.0	9.8	105	11.8	7.2	0	0.0	11.2	0	0.0	8.1	18.8
Middle	0	0.0	29.4	0	0.0	23.4	6	35.3	31.9	1,390	19.9	25.5	34.4
Upper	3	75.0	59.7	786	88.2	68.7	11	64.7	55.4	5,587	80.1	65.4	41.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>891</b>	<b>100.0</b>	<b>100.0</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>6,977</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	2.2	0	0.0	1.6	0	0.0	2.7	0	0.0	1.7	5.2
Moderate	1	100.0	11.0	155	100.0	9.1	0	0.0	11.6	0	0.0	9.1	18.8
Middle	0	0.0	28.7	0	0.0	24.4	0	0.0	28.2	0	0.0	23.5	34.4
Upper	0	0.0	58.1	0	0.0	65.0	0	0.0	57.5	0	0.0	65.7	41.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>155</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>												<b>Multi-family Units %</b>	
Low	0	0.0	20.4	0	0.0	13.8	1	25.0	15.9	2,345	18.1	15.7	16.4
Moderate	0	0.0	34.7	0	0.0	31.2	0	0.0	36.0	0	0.0	35.8	32.2
Middle	0	0.0	25.2	0	0.0	22.2	3	75.0	32.9	10,576	81.9	24.5	31.2
Upper	0	0.0	19.7	0	0.0	32.7	0	0.0	15.2	0	0.0	24.1	20.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>12,921</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>												<b>Owner Occupied Units %</b>	
Low	0	0.0	2.1	0	0.0	1.9	1	3.0	2.5	2,345	9.1	2.5	5.2
Moderate	4	30.8	12.2	562	4.9	10.3	0	0.0	13.7	0	0.0	12.2	18.8
Middle	2	15.4	33.2	5,260	46.2	27.1	10	30.3	32.8	12,106	47.0	26.8	34.4
Upper	7	53.8	52.6	5,551	48.8	60.7	22	66.7	50.9	11,292	43.9	58.5	41.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>11,373</b>	<b>100.0</b>	<b>100.0</b>	<b>33</b>	<b>100.0</b>	<b>100.0</b>	<b>25,743</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

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

**Table D-27**

**Distribution of 2019 Home Mortgage Lending By Income Level of Geography  
Assessment Area: Fort Worth Metropolitan**

Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	2.7	0	0.0	1.6	5.2
Moderate	0	0.0	15.2	0	0.0	11.5	18.8
Middle	0	0.0	35.4	0	0.0	30.0	34.4
Upper	1	100.0	46.7	332	100.0	56.8	41.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>332</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	1.5	0	0.0	0.9	5.2
Moderate	1	20.0	11.9	125	12.6	8.2	18.8
Middle	1	20.0	32.6	172	17.3	25.5	34.4
Upper	3	60.0	53.9	696	70.1	65.4	41.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>993</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	2.9	0	0.0	2.5	5.2
Moderate	0	0.0	12.4	0	0.0	9.3	18.8
Middle	0	0.0	30.7	0	0.0	27.6	34.4
Upper	0	0.0	53.9	0	0.0	60.6	41.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>							<b>Multi-family Units %</b>
Low	0	0.0	18.3	0	0.0	15.7	16.4
Moderate	0	0.0	31.7	0	0.0	26.6	32.2
Middle	0	0.0	26.1	0	0.0	27.1	31.2
Upper	0	0.0	23.9	0	0.0	30.6	20.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							<b>Owner Occupied Units %</b>
Low	0	0.0	2.4	0	0.0	3.0	5.2
Moderate	1	16.7	14.2	125	9.4	12.4	18.8
Middle	1	16.7	34.5	172	13.0	28.5	34.4
Upper	4	66.7	48.8	1,028	77.6	56.2	41.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>1,325</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

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

**Table D-28**

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Fort Worth Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Low</b>	6	10.9	7.0	3,466	29.1	8.5	1	3.3	6.9	153	1.5	8.5	6.9
<b>Moderate</b>	11	20.0	21.5	2,127	17.9	24.2	4	13.3	21.2	1,363	13.7	24.1	21.0
<b>Middle</b>	16	29.1	25.6	2,546	21.4	22.7	11	36.7	26.6	3,171	31.8	22.9	28.3
<b>Upper</b>	22	40.0	45.3	3,761	31.6	43.9	14	46.7	44.6	5,289	53.0	43.9	43.7
<b>Unknown</b>	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0	0	0.0	0.2	0.1
<b>Total</b>	55	100.0	100.0	11,900	100.0	100.0	30	100.0	100.0	9,976	100.0	100.0	100.0

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table D-29**

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Fort Worth Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
<b>Low</b>	0	0.0	6.7	0	0.0	8.7	6.8
<b>Moderate</b>	1	6.3	21.3	900	11.2	24.0	21.3
<b>Middle</b>	4	25.0	25.5	1,290	16.1	22.0	28.3
<b>Upper</b>	11	68.8	44.9	5,820	72.7	44.3	43.4
<b>Unknown</b>	0	0.0	0.1	0	0.0	0.2	0.1
<b>Total</b>	16	100.0	100.0	8,010	100.0	100.0	100.0

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table D-30**  
**Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level**  
**Assessment Area: Fort Worth Metropolitan**

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	3.9	0	0.0	2.2	0	0.0	2.8	0	0.0	1.4	22.9
Moderate	1	14.3	21.0	158	1.6	15.5	0	0.0	16.4	0	0.0	11.6	16.2
Middle	0	0.0	26.5	0	0.0	23.8	1	9.1	22.7	275	5.4	19.9	19.3
Upper	4	57.1	38.3	5,342	52.7	47.8	10	90.9	35.7	4,820	94.6	46.9	41.6
Unknown	2	28.6	10.3	4,632	45.7	10.7	0	0.0	22.5	0	0.0	20.1	0.0
<b>Total</b>	<b>7</b>	<b>100.0</b>	<b>100.0</b>	<b>10,132</b>	<b>100.0</b>	<b>100.0</b>	<b>11</b>	<b>100.0</b>	<b>100.0</b>	<b>5,095</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	2.9	0	0.0	1.4	0	0.0	3.6	0	0.0	1.9	22.9
Moderate	0	0.0	10.4	0	0.0	6.6	1	5.9	11.6	252	3.6	7.5	16.2
Middle	0	0.0	18.1	0	0.0	14.0	6	35.3	18.5	1,359	19.5	14.5	19.3
Upper	3	75.0	45.3	691	77.6	54.0	10	58.8	41.9	5,366	76.9	51.0	41.6
Unknown	1	25.0	23.3	200	22.4	23.9	0	0.0	24.3	0	0.0	25.0	0.0
<b>Total</b>	<b>4</b>	<b>100.0</b>	<b>100.0</b>	<b>891</b>	<b>100.0</b>	<b>100.0</b>	<b>17</b>	<b>100.0</b>	<b>100.0</b>	<b>6,977</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	4.8	0	0.0	2.8	0	0.0	5.5	0	0.0	3.3	22.9
Moderate	0	0.0	13.1	0	0.0	9.6	0	0.0	12.1	0	0.0	8.5	16.2
Middle	0	0.0	19.3	0	0.0	16.9	0	0.0	18.2	0	0.0	15.7	19.3
Upper	0	0.0	60.1	0	0.0	67.0	0	0.0	60.5	0	0.0	68.1	41.6
Unknown	1	100.0	2.7	155	100.0	3.7	0	0.0	3.7	0	0.0	4.4	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>155</b>	<b>100.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	3.3	0	0.0	1.8	0	0.0	3.3	0	0.0	1.7	22.9
Moderate	1	7.7	14.8	158	1.4	10.6	1	3.4	13.7	252	2.0	9.5	16.2
Middle	0	0.0	21.1	0	0.0	18.3	7	24.1	20.2	1,634	12.7	17.0	19.3
Upper	8	61.5	40.8	6,228	54.8	50.2	21	72.4	39.2	10,936	85.3	49.0	41.6
Unknown	4	30.8	19.9	4,987	43.8	19.0	0	0.0	23.8	0	0.0	22.8	0.0
<b>Total</b>	<b>13</b>	<b>100.0</b>	<b>100.0</b>	<b>11,373</b>	<b>100.0</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>	<b>100.0</b>	<b>12,822</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data

2011-2015 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-31**

**Distribution of 2019 Home Mortgage Lending By Borrower Income Level  
Assessment Area: Fort Worth Metropolitan**

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	2.8	0	0.0	1.5	22.9
Moderate	0	0.0	16.8	0	0.0	11.6	16.2
Middle	0	0.0	24.8	0	0.0	21.2	19.3
Upper	0	0.0	40.7	0	0.0	51.5	41.6
Unknown	1	100.0	14.8	332	100.0	14.2	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>332</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	4.2	0	0.0	2.0	22.9
Moderate	0	0.0	11.8	0	0.0	7.1	16.2
Middle	0	0.0	18.8	0	0.0	14.0	19.3
Upper	1	20.0	45.3	348	35.0	55.3	41.6
Unknown	4	80.0	19.9	645	65.0	21.6	0.0
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>993</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	4.7	0	0.0	3.2	22.9
Moderate	0	0.0	14.2	0	0.0	10.8	16.2
Middle	0	0.0	18.9	0	0.0	16.0	19.3
Upper	0	0.0	58.3	0	0.0	64.0	41.6
Unknown	0	0.0	4.0	0	0.0	6.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	0	0.0	3.3	0	0.0	1.7	22.9
Moderate	0	0.0	14.8	0	0.0	10.0	16.2
Middle	0	0.0	22.2	0	0.0	18.6	19.3
Upper	1	16.7	42.0	348	26.3	52.3	41.6
Unknown	5	83.3	17.7	977	73.7	17.4	0.0
<b>Total</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>1,325</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data

2011-2015 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-32**

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Fort Worth Metropolitan													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	#	#%	#%	\$(000)	%	%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	14	25.5	37.6	4,929	41.4	25.1	9	30.0	41.0	3,607	36.2	28.5	93.1
<b>Over \$1 Million</b>	3	5.5		850	7.1		3	10.0		2,435	24.4		5.8
<b>Revenue Unknown</b>	38	69.1		6,121	51.4		18	60.0		3,934	39.4		1.0
<b>Total</b>	55	100.0		11,900	100.0		30	100.0		9,976	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	30	54.5	87.0	1,221	10.3	32.1	9	30.0	91.8	341	3.4	36.9	
<b>\$100,001 - \$250,000</b>	8	14.5	7.4	1,654	13.9	20.0	8	26.7	4.5	1,341	13.4	17.0	
<b>\$250,001 - \$1 Million</b>	17	30.9	5.6	9,025	75.8	47.9	13	43.3	3.8	8,294	83.1	46.1	
<b>Total</b>	55	100.0	100.0	11,900	100.0	100.0	30	100.0	100.0	9,976	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	2	14.3		150	3.0		2	22.2		132	3.7		
<b>\$100,001 - \$250,000</b>	5	35.7		1,062	21.5		2	22.2		325	9.0		
<b>\$250,001 - \$1 Million</b>	7	50.0		3,717	75.4		5	55.6		3,150	87.3		
<b>Total</b>	14	100.0		4,929	100.0		9	100.0		3,607	100.0		
Source: 2021 FFIEC Census Data													
2021 Dun & Bradstreet Data													
2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

**Table D-33**

<b>Distribution of 2019 Small Business Lending By Revenue Size of Businesses</b>							
<b>Assessment Area: Fort Worth Metropolitan</b>							
	<b>Bank And Aggregate Loans</b>						<b>Total Businesses %</b>
	<b>Bank</b>		<b>Agg</b>	<b>Bank</b>		<b>Agg</b>	
	<b>#</b>	<b>%</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>	<b>%</b>	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	11	68.8	46.3	5,720	71.4	34.6	92.7
<b>Over \$1 Million</b>	3	18.8		1,465	18.3		6.3
<b>Revenue Unknown</b>	2	12.5		825	10.3		1.0
<b>Total</b>	16	100.0		8,010	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	3	18.8	93.0	160	2.0	37.5	
<b>\$100,001 - \$250,000</b>	3	18.8	3.5	426	5.3	14.8	
<b>\$250,001 - \$1 Million</b>	10	62.5	3.6	7,424	92.7	47.7	
<b>Total</b>	16	100.0	100.0	8,010	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	2	18.2		85	1.5		
<b>\$100,001 - \$250,000</b>	2	18.2		301	5.3		
<b>\$250,001 - \$1 Million</b>	7	63.6		5,334	93.3		
<b>Total</b>	11	100.0		5,720	100.0		
<i>Source: 2019 FFIEC Census Data 2019 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							



**APPENDIX E – NONMETROPOLITAN LIMITED-SCOPE ASSESSMENT AREAS**

**Appendix E-1  
Table E-1**

2021 Refugio 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	461	24.1
Moderate	0	0.0	0	0.0	0	0.0	326	17.0
Middle	2	100.0	1,916	100.0	315	16.4	323	16.9
Upper	0	0.0	0	0.0	0	0.0	806	42.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>2</b>	<b>100.0</b>	<b>1,916</b>	<b>100.0</b>	<b>315</b>	<b>16.4</b>	<b>1,916</b>	<b>100.0</b>
	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	3,727	2,035	100.0	54.6	718	19.3	974	26.1
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,727</b>	<b>2,035</b>	<b>100.0</b>	<b>54.6</b>	<b>718</b>	<b>19.3</b>	<b>974</b>	<b>26.1</b>
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	227	100.0	198	100.0	21	100.0	8	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>227</b>	<b>100.0</b>	<b>198</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>			<b>87.2</b>		<b>9.3</b>		<b>3.5</b>	
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	28	100.0	28	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>28</b>	<b>100.0</b>	<b>28</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>			<b>100.0</b>		<b>0.0</b>		<b>0.0</b>	

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table E-2**

2020 Refugio 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	461	24.1
Moderate	0	0.0	0	0.0	0	0.0	326	17.0
Middle	2	100.0	1,916	100.0	315	16.4	323	16.9
Upper	0	0.0	0	0.0	0	0.0	806	42.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>2</b>	<b>100.0</b>	<b>1,916</b>	<b>100.0</b>	<b>315</b>	<b>16.4</b>	<b>1,916</b>	<b>100.0</b>
	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	3,727	2,035	100.0	54.6	718	19.3	974	26.1
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,727</b>	<b>2,035</b>	<b>100.0</b>	<b>54.6</b>	<b>718</b>	<b>19.3</b>	<b>974</b>	<b>26.1</b>
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	227	100.0	198	100.0	21	100.0	8	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>227</b>	<b>100.0</b>	<b>198</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>87.2</b>		<b>9.3</b>		<b>3.5</b>
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	29	100.0	29	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>29</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>100.0</b>		<b>0.0</b>		<b>0.0</b>

Source: 2020 FFIEC Census Data  
2020 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table E-3**

2019 Refugio 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	461	24.1
Moderate	0	0.0	0	0.0	0	0.0	326	17.0
Middle	2	100.0	1,916	100.0	315	16.4	323	16.9
Upper	0	0.0	0	0.0	0	0.0	806	42.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>2</b>	<b>100.0</b>	<b>1,916</b>	<b>100.0</b>	<b>315</b>	<b>16.4</b>	<b>1,916</b>	<b>100.0</b>
	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	0	0	0.0	0.0	0	0.0	0	0.0
Middle	3,727	2,035	100.0	54.6	718	19.3	974	26.1
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>3,727</b>	<b>2,035</b>	<b>100.0</b>	<b>54.6</b>	<b>718</b>	<b>19.3</b>	<b>974</b>	<b>26.1</b>
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	216	100.0	188	100.0	21	100.0	7	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>216</b>	<b>100.0</b>	<b>188</b>	<b>100.0</b>	<b>21</b>	<b>100.0</b>	<b>7</b>	<b>100.0</b>
<b>Percentage of Total Businesses:</b>				<b>87.0</b>		<b>9.7</b>		<b>3.2</b>
	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	0	0.0	0	0.0	0	0.0	0	0.0
Middle	30	100.0	30	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
<b>Total AA</b>	<b>30</b>	<b>100.0</b>	<b>30</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
<b>Percentage of Total Farms:</b>				<b>100.0</b>		<b>0.0</b>		<b>0.0</b>

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table E-4**

**Distribution of 2020 and 2021 Home Mortgage Lending By Income Level of Geography  
Assessment Area: Refugio County Nonmetropolitan**

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
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	0	0.0	0.0	0	0.0	0.0	0.0
Middle	3	100.0	100.0	181	100.0	100.0	1	100.0	100.0	143	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>181</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>143</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
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	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
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	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Multifamily Loans</b>												<b>Multi-family Units %</b>	
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	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>												<b>Owner Occupied Units %</b>	
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	0	0.0	0.0	0	0.0	0.0	0.0
Middle	3	100.0	100.0	181	100.0	100.0	1	100.0	100.0	143	100.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>181</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>143</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

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

**Table E-5**

**Distribution of 2019 Home Mortgage Lending By Income Level of Geography  
Assessment Area: Refugio County Nonmetropolitan**

Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %	
	Bank		Agg	Bank			Agg
	#	#%	#%	\$(000)	%		%
<b>Home Purchase Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	
Middle	0	0.0	100.0	0	0.0	100.0	
Upper	0	0.0	0.0	0	0.0	0.0	
Unknown	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	
<b>Refinance Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	
Middle	0	0.0	100.0	0	0.0	100.0	
Upper	0	0.0	0.0	0	0.0	0.0	
Unknown	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	
Middle	0	0.0	100.0	0	0.0	100.0	
Upper	0	0.0	0.0	0	0.0	0.0	
Unknown	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	
<b>Multifamily Loans</b>						<b>Multi-family Units %</b>	
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	
Middle	0	0.0	0.0	0	0.0	100.0	
Upper	0	0.0	0.0	0	0.0	0.0	
Unknown	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	
<b>Total Home Mortgage Loans</b>						<b>Owner Occupied Units %</b>	
Low	0	0.0	0.0	0	0.0	0.0	
Moderate	0	0.0	0.0	0	0.0	0.0	
Middle	1	100.0	100.0	40	100.0	100.0	
Upper	0	0.0	0.0	0	0.0	0.0	
Unknown	0	0.0	0.0	0	0.0	0.0	
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	

Source: 2019 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

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

**Table E-6**

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Refugio County Nonmetropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	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	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	5	100.0	95.6	100	100.0	96.5	6	100.0	96.8	337	100.0	97.6	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>5</b>	<b>100.0</b>	<b>100.0</b>	<b>100</b>	<b>100.0</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>100.0</b>	<b>337</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table E-7**

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Refugio County Nonmetropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	2	100.0	85.6	163	100.0	93.8	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>2</b>	<b>100.0</b>	<b>100.0</b>	<b>163</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data  
2019 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table E-8**  
**Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level**  
**Assessment Area: Refugio County Nonmetropolitan**

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2020						2021						
	Bank		Agg		Bank		Agg		Bank		Agg		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>Home Purchase Loans</b>													
Low	0	0.0	3.8	0	0.0	1.5	0	0.0	1.4	0	0.0	0.7	24.1
Moderate	0	0.0	13.9	0	0.0	7.6	0	0.0	9.5	0	0.0	6.1	17.0
Middle	0	0.0	19.0	0	0.0	18.4	0	0.0	27.0	0	0.0	19.4	16.9
Upper	3	100.0	53.2	181	100.0	62.0	1	100.0	47.3	143	100.0	56.4	42.1
Unknown	0	0.0	10.1	0	0.0	10.5	0	0.0	14.9	0	0.0	17.4	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>181</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>143</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	9.5	0	0.0	5.5	24.1
Moderate	0	0.0	7.5	0	0.0	3.1	0	0.0	7.1	0	0.0	6.6	17.0
Middle	0	0.0	10.0	0	0.0	5.7	0	0.0	9.5	0	0.0	6.3	16.9
Upper	0	0.0	47.5	0	0.0	53.0	0	0.0	47.6	0	0.0	46.5	42.1
Unknown	0	0.0	35.0	0	0.0	38.1	0	0.0	26.2	0	0.0	35.1	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	24.1
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	17.0
Middle	0	0.0	50.0	0	0.0	28.6	0	0.0	50.0	0	0.0	31.8	16.9
Upper	0	0.0	25.0	0	0.0	6.8	0	0.0	50.0	0	0.0	68.2	42.1
Unknown	0	0.0	25.0	0	0.0	64.5	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>													
Low	0	0.0	2.3	0	0.0	0.9	0	0.0	4.9	0	0.0	2.4	24.1
Moderate	0	0.0	10.7	0	0.0	5.6	0	0.0	8.2	0	0.0	6.1	17.0
Middle	0	0.0	16.0	0	0.0	13.6	0	0.0	20.5	0	0.0	14.9	16.9
Upper	3	100.0	48.9	181	100.0	56.6	1	100.0	45.9	143	100.0	51.9	42.1
Unknown	0	0.0	22.1	0	0.0	23.4	0	0.0	20.5	0	0.0	24.8	0.0
<b>Total</b>	<b>3</b>	<b>100.0</b>	<b>100.0</b>	<b>181</b>	<b>100.0</b>	<b>100.0</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>143</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2021 FFIEC Census Data

2011-2015 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 E-9**

**Distribution of 2019 Home Mortgage Lending By Borrower Income Level  
Assessment Area: Refugio County Nonmetropolitan**

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>Home Purchase Loans</b>							
Low	0	0.0	1.6	0	0.0	0.7	24.1
Moderate	0	0.0	11.3	0	0.0	6.0	17.0
Middle	0	0.0	25.8	0	0.0	23.0	16.9
Upper	0	0.0	46.8	0	0.0	58.4	42.1
Unknown	0	0.0	14.5	0	0.0	11.8	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Refinance Loans</b>							
Low	0	0.0	4.2	0	0.0	0.9	24.1
Moderate	0	0.0	4.2	0	0.0	1.0	17.0
Middle	0	0.0	0.0	0	0.0	0.0	16.9
Upper	0	0.0	75.0	0	0.0	77.9	42.1
Unknown	0	0.0	16.7	0	0.0	20.2	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Home Improvement Loans</b>							
Low	0	0.0	0.0	0	0.0	0.0	24.1
Moderate	0	0.0	0.0	0	0.0	0.0	17.0
Middle	0	0.0	0.0	0	0.0	0.0	16.9
Upper	0	0.0	100.0	0	0.0	100.0	42.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
<b>Total</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>0</b>	<b>0.0</b>	<b>100.0</b>	<b>100.0</b>
<b>Total Home Mortgage Loans</b>							
Low	0	0.0	2.1	0	0.0	0.7	24.1
Moderate	1	100.0	8.2	40	100.0	4.1	17.0
Middle	0	0.0	17.5	0	0.0	15.2	16.9
Upper	0	0.0	54.6	0	0.0	64.3	42.1
Unknown	0	0.0	17.5	0	0.0	15.7	0.0
<b>Total</b>	<b>1</b>	<b>100.0</b>	<b>100.0</b>	<b>40</b>	<b>100.0</b>	<b>100.0</b>	<b>100.0</b>

Source: 2019 FFIEC Census Data

2011-2015 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 E-10**

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Refugio County Nonmetropolitan													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
<b>By Revenue</b>													
<b>\$1 Million or Less</b>	3	60.0	23.0	61	61.0	18.1	2	33.3	29.8	132	39.2	9.1	87.2
<b>Over \$1 Million</b>	0	0.0		0	0.0		0	0.0		0	0.0		9.3
<b>Revenue Unknown</b>	2	40.0		39	39.0		4	66.7		205	60.8		3.5
<b>Total</b>	5	100.0		100	100.0		6	100.0		337	100.0		100.0
<b>By Loan Size</b>													
<b>\$100,000 or Less</b>	5	100.0	90.3	100	100.0	37.7	5	83.3	91.5	223	66.2	31.6	
<b>\$100,001 - \$250,000</b>	0	0.0	7.1	0	0.0	26.7	1	16.7	5.3	114	33.8	26.6	
<b>\$250,001 - \$1 Million</b>	0	0.0	2.7	0	0.0	35.5	0	0.0	3.2	0	0.0	41.8	
<b>Total</b>	5	100.0	100.0	100	100.0	100.0	6	100.0	100.0	337	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>													
<b>\$100,000 or Less</b>	3	100.0		61	100.0		2	100.0		132	100.0		
<b>\$100,001 - \$250,000</b>	0	0.0		0	0.0		0	0.0		0	0.0		
<b>\$250,001 - \$1 Million</b>	0	0.0		0	0.0		0	0.0		0	0.0		
<b>Total</b>	3	100.0		61	100.0		2	100.0		132	100.0		

Source: 2021 FFIEC Census Data  
2021 Dun & Bradstreet Data  
2011-2015 U.S. Census Bureau: American Community Survey  
Note: Percentages may not total 100.0 percent due to rounding.

**Table E-11**

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Refugio County Nonmetropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
<b>By Revenue</b>							
<b>\$1 Million or Less</b>	1	50.0	33.1	41	25.2	25.3	87.0
<b>Over \$1 Million</b>	1	50.0		122	74.8		9.7
<b>Revenue Unknown</b>	0	0.0		0	0.0		3.2
<b>Total</b>	2	100.0		163	100.0		100.0
<b>By Loan Size</b>							
<b>\$100,000 or Less</b>	1	50.0	94.1	41	25.2	40.6	
<b>\$100,001 - \$250,000</b>	1	50.0	4.2	122	74.8	21.4	
<b>\$250,001 - \$1 Million</b>	0	0.0	1.7	0	0.0	38.0	
<b>Total</b>	2	100.0	100.0	163	100.0	100.0	
<b>By Loan Size and Revenues \$1 Million or Less</b>							
<b>\$100,000 or Less</b>	1	100.0		41	100.0		
<b>\$100,001 - \$250,000</b>	0	0.0		0	0.0		
<b>\$250,001 - \$1 Million</b>	0	0.0		0	0.0		
<b>Total</b>	1	100.0		41	100.0		
<i>Source: 2019 FFIEC Census Data 2019 Dun &amp; Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey</i>							
<i>Note: Percentages may not total 100.0 percent due to rounding.</i>							

## APPENDIX F – 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.