PUBLIC DISCLOSURE

August 26, 2024

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Susser Bank
RSSD # 965789
100 Crescent Court, Suite 575
Dallas, Texas 75201

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

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INSTITUTION'S COMMUNITY REINVESTMENT ACT RATING

This institution is rated: *Satisfactory*.
The Lending Test is rated: *Satisfactory*.
The Community Development Test is rated: *Satisfactory*.

Susser Bank (Susser or bank) is rated **Satisfactory**. This rating is based on the following conclusions with respect to the performance criteria under the Lending Test and Community Development (CD) Test:

- Susser's 10-quarter average net loan-to-deposit ratio (NLTD) is reasonable given the bank's asset size, financial condition, and the credit needs of the assessment areas (AAs).
- A majority of the bank's loans are originated inside the AAs.
- A reasonable distribution of loans occurs throughout the delineated AAs.
- Lending reflects a reasonable distribution among individuals of different income levels of different income levels, including low- and moderate-income (LMI), and businesses of different revenue sizes.
- Neither the bank nor the Federal Reserve Bank of Dallas (Reserve Bank) received any substantive CRA-related complaints since the previous evaluation.
- CD activity reflects adequate responsiveness to the needs of the AAs.

SCOPE OF THE EVALUATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions (ISB)* to evaluate the bank's CRA performance.[1] The evaluation considered CRA performance context, including Susser's asset size, financial condition, business strategy and market competition, as well as AA demographic and economic characteristics, and credit needs. Performance was assessed within the bank's four delineated AAs within the state of Texas: Austin, TX Metropolitan, Dallas-Fort Worth, TX (DFW) Metropolitan, Houston, TX Metropolitan, and San Antonio, TX Metropolitan. To assess Susser's performance in meeting the credit and CD needs of the AAs, the Austin Metropolitan and DFW Metropolitan AAs received a full-scope review, while the Houston Metropolitan and San Antonio Metropolitan AAs received limited-scope review. Examiners reviewed the following data:

- Susser's 10-quarter average NLTD ratio, ending March 31, 2024;
- A statistically derived sample of the bank's main loan product, commercial loans, which consists of 94 small business loans selected from a universe of 175 loans originated between January 1, 2023, and December 31, 2023;
- The universe of residential real estate lending activity reported by the bank on its 2023 Home Mortgage Disclosure Act (HMDA) Loan/Application Register, which totaled 461 loan/applications; and
- Qualified CD activities (loans, investments, grants and donations, and services) from February 28, 2022, through August 26, 2024;

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[1] The January 1, 2024 CRA asset thresholds define "large banks" as banks with assets of at least $1.564 billion as of December 31 of both of the prior two calendar years. Susser's assets as of December 31, 2022 and December 31, 2023 surpassed this threshold; however, its assets in prior calendar years did not meet applicable thresholds. Based on the FFIECs Explanation of CRA Asset-Size Threshold Change, banks cannot be examined under the large bank examination procedures until they have at least one full year of CRA data collected.

- Information provided by two members of the communities served by the bank to further assess the credit and CD needs as well as the economic conditions of the AAs receiving full-scope reviews.

DESCRIPTION OF THE INSTITUTION

Susser, an intrastate community bank headquartered in Dallas, Texas, has the following characteristics.

- The bank is a wholly owned subsidiary of Susser Bank Holdings Corporation.
- As of March 31, 2024, Susser has total assets of $2.1 billion.
- The bank operates nine locations across the state of Texas, with a full-service automatic teller machine (ATM) available at each location.
- As shown in Table 1, Susser is primarily a commercial lender, as commercial loans represent 83.7 percent of the loan portfolio as of March 31, 2024.
- The bank sells the majority of its residential real estate loans on the secondary market; as such, its loan portfolio composition does not reflect the extent of the residential real estate activity.

Table 1

Composition of Loan Portfolio as of March 31, 2024		
Loan Type	**$(000)**	**%**
Agricultural	11,686	0.7
Commercial	1,357,531	83.7
Consumer	21,560	1.3
Residential Real Estate	231,418	14.3
Other	335	0.0
Gross Loans	1,622,530	100.0
Note: Percentages may not total 100.0 percent due to rounding.		

The Federal Reserve Bank of Dallas rated Susser Bank's CRA performance as **Satisfactory** at the previous performance evaluation dated February 28, 2022. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its communities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS[2]

LENDING TEST

This performance evaluation first discusses Susser's overall performance, followed by an in-depth evaluation of performance in the DFW Metropolitan and Austin Metropolitan AAs (full-scope review); and a brief discussion of performance in the Houston Metropolitan and San Antonio Metropolitan AAs (limited-scope review).

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[2] The NLTD ratio and assessment area concentration only apply to the institution overall. No discussion of these performance criteria applies to the sections of the performance evaluation related to the individual AAs.

Susser's overall performance under the Lending Test is satisfactory. The rating is based on a reasonable average NLTD ratio, a majority of loans originated within the bank's AAs, and an overall reasonable geographic and borrower distribution of loans. Each of the performance criteria considered under this test are discussed below.

More weight was given to Susser's performance in the DFW Metropolitan AA rather than the Austin Metropolitan AA based on the bank's lending, deposits, and branching in each respective AA, as well as the bank's opportunities in each geography. The limited-scope AAs received a cursory review for comparative purposes. In addition, more consideration was given to the volume of loan originations than the dollar amount, as this represents the number of individuals and entities served. For home mortgage lending, emphasis was placed on Susser's performance relative to other HMDA-reporting institutions operating in the same area (aggregate lenders) rather than respective demographic figures, as aggregate lending is a better indicator of credit demand. However, aggregate lending data related to small business lending was not relied upon, as Susser was not a reporter of small business loan data during this evaluation. As such, examiners relied on Dun & Bradstreet (D&B) data to assess the bank's performance for small business lending.

Net Loan-to-Deposit Ratio

This performance criterion evaluates the bank's average NLTD ratio to determine the reasonableness of lending in light of performance context, such as capacity to lend, availability of lending opportunities, and demographic and economic factors present in the AAs. Moreover, Susser's performance is compared to similarly situated institutions insured by the Federal Deposit Insurance Corporation (FDIC). Examiners considered the bank's asset size, activity in the delineated AAs, and loan portfolio composition when selecting similarly situated institutions.

Susser's 10-quarter average NLTD ratio is reasonable. Throughout the review period, the bank's NLTD ratio ranged between 74.6 and 84.2 percent, which is comparable to the NLTD ratios of the selected similarly situated institutions. None of the NLTD ratios fluctuated by more than 16.2 percent during the review period. The NLTD ratios of the bank and comparator institutions, as presented in Table 2, reflect reasonable lending levels in the AAs.

Table 2

Comparative Net Loan to Deposit Ratios October 1, 2021 – March 31, 2024			
Institution	**Location**	**Asset Size $(000)**	**10-Quarter Average NLTD Ratio (%)**
Susser Bank	Dallas, Texas	2,151,670	80.4
Similarly Situated Institutions	Dallas, Texas	1,168,141	97.3
	Dallas, Texas	2,254,750	82.9
	Fort Worth, Texas	2,747,997	68.3

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of Susser's delineated AAs. The bank originated a majority of loans, by number and dollar volume, inside its AAs. As shown in Table 3, Susser originated a higher percentage of small business loans inside the delineated AAs than HMDA-reportable loans. Considering Susser is primarily a commercial lender, with commercial loans comprising a majority of its loan portfolio, the bank's lending patterns reflect reasonable efforts to lend to the communities where it takes deposits.

Table 3

Loan Type	Inside Assessment Areas				Outside Assessment Areas			
	#	#%	$(000)	$%	#	#%	$(000)	$%
Home Improvement	0	0.0	0	0.0	1	100.0	2,104	100.0
Home Purchase –	112	58.3	49,824	60.3	80	41.7	32,779	39.7
Home Purchase – FHA	21	43.8	6,378	49.8	27	56.3	6,149	50.2
Home Purchase - VA	11	64.7	4,638	69.7	6	35.3	2,012	30.3
Home Improvement	0	0.0	0	0.0	1	100.0	2,104	100.0
Multi-Family Housing	3	75.0	13,082	77.0	1	25.0	3,900	23.0
Other Purpose Closed-End	2	66.7	875	68.6	1	33.3	400	31.4
Refinancing	23	43.4	12,613	57.9	30	56.6	9,171	42.1
Total HMDA	**172**	**54.1**	**87,410**	**60.6**	**146**	**45.9**	**56,785**	**39.4**
Total Small Business	**77**	**81.9**	**24,558**	**74.0**	**17**	**18.1**	**8,611**	**26.0**
Total Loans	**249**	**60.4**	**111,968**	**63.1**	**163**	**39.6**	**65,396**	**36.9**
Note: Percentages may not total 100.0 percent due to rounding.								

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

Geographic Distribution of Loans

This performance criterion evaluates the distribution of lending within Susser's AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs. The bank's overall geographic distribution of loans reflects reasonable distribution among the different census tracts and dispersion throughout the AAs.

Due to the limited volume of originations in the Austin Metropolitan AA, a meaningful analysis of the distribution of the bank's lending could not be conducted. Therefore, the overall rating was based on the bank's performance in the DFW Metropolitan AA.

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

This performance criterion evaluates Susser's lending to borrowers of different income levels and businesses of different revenue sizes. The bank's lending has an overall reasonable distribution among individuals of different income levels and businesses of different revenue sizes.

Due to the limited volume of originations in the Austin Metropolitan AA, the overall rating was based on the performance in the DFW Metropolitan AA.

Response to Complaints

Susser's record of taking action, if warranted, in response to comments about its performance in helping to meet the credit needs in the bank's AAs is appropriate. Members of the community submitted comment letters related to Susser's lending performance within the bank's delineated AAs. Susser responded to the comment letters thoroughly and in a timely matter, providing additional context for its lending performance in the AAs. The Reserve Bank considered the comments from the members of the community as well as the bank's response to determine the scope of the evaluation as well as to reach conclusions of Susser's overall performance in helping to meet the credit needs of the delineated AAs. Neither the comment letters nor the bank's response affected the conclusions reached by the Reserve Bank.

COMMUNITY DEVELOPMENT TEST

The CD Test evaluates Susser's responsiveness to the CD needs of its AAs through qualified loans, investments, and services, considering the bank's capacity and the need and availability of such opportunities.

Susser's overall CD performance demonstrates adequate responsiveness despite a decline in the number of CD activities since the prior evaluation. As noted in Table 4, Susser originated 22 CD loans for a total of $60.2 million during the review period, which is drastically lower than the 591 noted at the previous evaluation but comparable to the performance of similarly situated institutions. The substantial decline in the number of CD loans extended is primarily attributed to the end of the Small Business Administration's Paycheck Protection Program (PPP) in May 2021, as 585 (99.0 percent) of the CD loans were made through the federal lending program in response to the COVID-19 pandemic. Similarly, Susser's number of CD investments, donations, and grants as well as services decreased when compared to the bank's performance at the prior evaluation. However, the dollar amount of investments increased over 857.0 percent, and the number of hours served remained similar to the one noted at the prior evaluation. Susser's level of CD investments and services is significantly lower than peers and does not reflect favorably on the bank's responsiveness to the CD needs and opportunities in the delineated AAs. However, the CD Test considers CD activity collectively and the level of CD lending, which is adequate, had the greatest impact on the overall rating.

As shown in Table 4, Susser extended credit, invested, and engaged in CD services for a variety of purposes. Specifically, the bank extended $23.7 million loans for affordable housing and $20.7 million to promote economic development and provide jobs within the bank's AAs. Details related to Susser's CD activity in the AAs receiving a full-scope review can be found in the separate AA discussions below.

Table 4

Community Development Activity								
Assessment Area: All AAs								
Community Development Purpose	Community Development Loans		Qualified Investments					Community Development Services
			Investments		Donations		Total Investments	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)	#
Affordable Housing	3	23,730	0	0	3	3	3	3	0
Community Services	1	2,000	0	0	26	312	26	312	9
Economic Development	14	20,690	3	6,500	10	10	13	6,510	0
Revitalization and Stabilization	4	13,742	0	0	0	0	0	0	0
Totals	**22**	**60,162**	**3**	**6,500**	**39**	**325**	**42**	**6,825**	**9**

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)

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

The DFW Metropolitan AA consists of the counties of Collin, Dallas, Denton, Ellis, Johnson, Parker, Rockwall and Tarrant. These counties comprise a portion of the Dallas-Plano-Irving, Texas Metropolitan Division (MD) and the Fort Worth-Arlington-Grapevine, Texas MD, which make up the Dallas-Fort Worth-Arlington, TX Metropolitan Statistical Area (MSA). Refer to Appendix A for an AA map and Appendix B for additional demographic data. The substantial majority of Susser's deposit and lending volume occur in the DFW Metropolitan AA. As such, the activity in the AA carried greater weight in the analysis of the institution overall.

- In 2023, Susser expanded the AA by adding the counties of Collin, Denton, Ellis, Johnson, Parker, and Rockwall.
- Susser operated six branches within the AA during the review period, one branch located in a low-income census tract, one branch in a moderate-income census tract, two branches in middle-income census tracts, and two in upper-income census tracts.
- According to the American Community Survey (ACS), the AA consists of 1,640 census tracts: 151 low-income census tracts (9.2 percent), 427 moderate-income census tracts (26.0 percent), 486 middle-income census tracts (29.6 percent), 552 upper-income census tracts (33.7 percent), and 24 census tracts with unknown income (1.5 percent).
- According to the FDIC Deposit Market Share Report June 30, 2023, Susser held 0.2 percent of the deposit market share, ranking 35th out of 164 FDIC-insured depository institutions operating in the AA. Charles Schwab Bank led the market with 38.3 percent of the market share. Other market leaders include Bank of America and JPMorgan Chase Bank, with 17.5 percent and 12.8 percent, respectively.
- In 2023, Susser originated 163 HMDA reportable loans, representing 0.1 percent of the 166,119 loans originated by aggregate lenders in the AA.
- Examiners interviewed a representative of a small business development center serving the area to obtain additional information of the financial climate of the region. The contact noted small business financing and financial education as the AA main needs.

Table 5			
Population Change			
Assessment Area: DFW Metropolitan			
Area	**2015 Population**	**2020 Population**	**Percent Change**
DFW Metropolitan	6,513,057	7,323,489	12.4
Collin County, TX	862,215	1,064,465	23.5
Dallas County, TX	2,485,003	2,613,539	5.2
Denton County, TX	731,851	906,422	23.9
Ellis County, TX	157,058	192,455	22.5
Johnson County, TX	155,450	179,927	15.7
Parker County, TX	121,418	148,222	22.1
Rockwall County, TX	85,536	107,819	26.1
Tarrant County, TX	1,914,526	2,110,640	10.2
Dallas-Plano-Irving, TX MD	4,519,004	5,129,966	13.5
Texas	26,538,614	29,145,505	9.8
Source: 2011-2015 U.S. Census Bureau American Community Survey			
2020 U.S. Census Bureau Decennial Census			

- As depicted in Table 5, the population grew significantly from 2015 to 2020, adding over 800,000 residents. Of all the counties in the AA, only Dallas County experienced a growth rate lower than that of the state of Texas. The next lowest growth rate was Tarrant County. This growth pattern indicates residents find the suburban portions of the MSA to be more desirable locations for individuals and families to reside.
- A local community leader attributed the rapid growth in the area to a thriving economy with ample high paying jobs from multiple businesses moving into the area.

Table 6

| | **Median Family Income Change** | | |
| | **Assessment Area: DFW Metropolitan** | | |
Area	**2015 Median Family Income ($)**	**2020 Median Family Income ($)**	**Percent Change (%)**
DFW Metropolitan	77,624	85,801	10.5
Collin County, TX	110,174	118,341	7.4
Dallas County, TX	61,072	69,689	14.1
Denton County, TX	99,628	111,436	11.9
Ellis County, TX	78,280	89,870	14.8
Johnson County, TX	71,657	73,563	2.7
Parker County, TX	88,541	97,507	10.1
Rockwall County, TX	104,958	113,658	8.3
Tarrant County, TX	76,367	82,856	8.5
Dallas-Plano-Irving, TX MD	77,736	88,315	13.6
Texas	68,523	76,073	11.0
Source: *2011 - 2015 U.S. Census Bureau American Community Survey*			
2016 - 2020 U.S. Census Bureau American Community Survey			
Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- As shown in Table 6, the AA median family income (MFI) grew at a similar rate to the state of Texas between 2015 and 2020. While the AA's MFI growth is slightly below that of the state of Texas, the AA MFI exceeds the statewide figure by 12.8 percent.
- While MFIs continue to grow for the Dallas-Plano-Irving, Texas MD and the Fort Worth-Arlington-Grapevine, Texas MD[3] in recent years, the growth has been commensurate to annual inflation rates. As such, the growth in MFIs has not translated to an increase of disposable income.
- A local contact indicated that inflation has had a severe impact on the AA residents. Despite pay rising, people are struggling on account of inflation.
- According to the 2023 FFIEC Census data, 8.2 percent of AA families live below the poverty level, which is below the poverty level of Texas, at 10.9 percent.

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3 Median family incomes grew for the Dallas-Plano-Irving, Texas MD and the Fort Worth-Arlington-Grapevine, Texas MD between 2020 and 2023 by 19.6 and 18.1 percent, respectively.

Table 7

Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
DFW Metropolitan	81.7	47.6	42.4	63.0	35.6	19.9
Collin County, TX	84.3	65.1	39.4	68.9	49.3	19.1
Dallas County, TX	80.2	42.0	42.7	61.6	31.2	22.6
Denton County, TX	86.7	56.6	41.7	69.8	48.1	18.8
Ellis County, TX	78.4	42.9	41.7	57.7	27.1	17.1
Johnson County, TX	68.0	39.1	38.1	45.8	23.3	15.4
Parker County, TX	71.2	32.0	39.4	56.4	31.4	16.6
Rockwall County, TX	81.7	58.0	36.8	73.1	43.9	17.9
Tarrant County, TX	83.5	47.8	44.0	64.1	34.6	19.2
Dallas-Plano-Irving, TX MD	81.3	47.6	42.0	63.0	36.2	20.6
Texas	78.3	44.6	42.7	57.3	31.0	19.0

Housing Cost Burden Rates
Assessment Area: DFW Metropolitan

Cost burden is housing cost that equals 30 percent or more of household income
Source: U.S. Department of Housing and Urban Development (HUD),
2016 – 2020 Comprehensive Housing Affordable Strategy

- As illustrated in Table 7, housing costs within the AA reflect a greater burden for LMI renters than LMI homeowners, indicating that it is more economical for low-income families to purchase a home rather than rent. However, other factors, such as downpayment requirements, high property taxes, and insurance costs, act as a barrier to homeownership for many LMI individuals.
- According to the 2023 FFIEC data, the AA's median gross rent is $1,192.
- In general, homes in the AA cost more than the rest of the state, as the AA's housing affordability ratio[4], at 30.5 percent, is below the statewide ratio of 34.1 percent.
- The median age of housing stock in the AA is 38 years, and the median housing value is $239,378, which is above the statewide median age of 33 and housing value of $187,200.

Table 8

Area	2019	2020	2021	2022	2023
DFW Metropolitan	3.3	7.1	5.1	3.5	3.2
Collin County, TX	3.1	6.3	4.4	3.2	3.5
Dallas County, TX	3.5	7.8	5.6	3.7	3.8
Denton County, TX	3.0	6.4	4.4	3.2	3.5
Ellis County, TX	3.1	6.0	4.5	3.5	3.7
Johnson County, TX	3.2	6.5	4.9	3.5	3.6
Parker County, TX	2.9	5.8	4.5	3.3	3.3
Rockwall County, TX	3.1	5.9	4.4	3.3	3.6
Tarrant County, TX	3.3	7.4	5.3	3.6	3.7
Dallas-Plano-Irving, TX MD	3.3	7.1	5.0	3.5	3.8
Texas	3.5	7.7	5.6	3.9	3.9

Unemployment Rates
Assessment Area: DFW Metropolitan

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

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[4] The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

- As shown in Table 8, the AA unemployment rate declined in 2021 and 2022 after facing a sharp increase due to the COVID-19 pandemic in 2020. The AA unemployment rate has stabilized and is comparable to pre-pandemic levels.
- Despite substantial population growth, the AA unemployment rates have consistently remained slightly below the statewide unemployment rates in the most recent five years, indicating that sufficient opportunity exists in the AA job market to absorb the influx of new residents.
- The AA is home to several large employers, 20 of which have more than 10,000 employees. These major employers represent diverse segments of the economy, including manufacturing (Lockheed Martin Corporation and Texas Instruments Incorporated), healthcare (Baylor Scott & White Health, Medical City Healthcare, Parkland Hospital, Texas Health Resources, and UT Southwestern Medical Center), and trade and transportation (Amazon, American Airlines, Southwest Airlines, UPS, and Wal-Mart).

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA

Susser's lending performance in the DFW Metropolitan AA is reasonable. The geographic distribution of the bank's lending as well as the distribution of lending to borrowers of different income levels and businesses of different revenue sizes reflects an adequate dispersion.

Geographic Distribution of Loans

Susser's home mortgage and small business lending each reflect reasonable distribution among geographies of different income levels and census tracts throughout the AA.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA lending among LMI census tracts is reasonable. During the review period, Susser originated 12.9 percent of its home mortgage loans to borrowers in LMI census tracts, which is comparable to the aggregate lenders in the area.

Susser's performance in number volume and dollar amount is closely comparable to the aggregate lenders in low-income census tracts during the review period. Further, the bank's performance is reasonable considering the limited opportunities to lend in such geographies. Low-income census tracts make up a much smaller portion of the AA and represent less than 20 percent of the owner-occupied units found in LMI census tracts. As such, opportunities to make HMDA-reportable loans in these tracts is lower.

Susser's performance in moderate-income census tracts is less than, but still comparable, to the aggregate lenders of the area. Several factors account for the bank's limited lending in moderate-income census tracts compared to aggregate HMDA lenders and AA demographics: competitive HMDA lending market and readily available rental housing in moderate-income census tracts. Susser's HMDA lending represents 0.1 percent of total HMDA loans in the AA for 2023 while the leading HMDA lenders in the market represented 5.7 percent and 4.5 percent, respectively. The bank's performance, while limited, demonstrates willingness to originate HMDA loans to borrowers in moderate-income census tracts.

Among HMDA-reportable loan products, only the bank's home purchase lending reflected sufficient volume for a meaningful analysis to be conducted of the product-specific distribution of the bank's lending. The remaining HMDA-reportable loan products are not discussed separately but are included in the analysis of Susser's total HMDA lending.

Home Purchase Lending

The geographic distribution of home purchase lending is reasonable. During the review period, Susser originated 12.5 percent of its home purchase loans in LMI census tracts, which is below but comparable to the aggregate lenders in the area. While there is limited opportunity to lend in low-income census tracts, there is opportunity to lend in the moderate-income geographies by both the bank and the aggregate lenders based on the level of demographics.

Table 9

Geographic Income Level	Bank and Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Distribution of 2023 Home Mortgage Lending by Income Level of Geography — *Assessment Area: DFW Metropolitan*							
Home Purchase Loans							
Low	2	1.5	3.5	427	0.8	2.1	4.3
Moderate	15	11.0	14.8	4,886	9.3	10.5	19.8
Middle	55	40.4	36.9	18,175	34.7	32.3	32.5
Upper	63	46.3	44.5	28,572	54.6	54.8	43.1
Unknown	1	0.7	0.3	300	0.6	0.4	0.3
Total	136	100.0	100.0	52,360	100.0	100.0	100.0
Refinance Loans							
Low	1	4.5	3.8	143	1.2	2.2	4.3
Moderate	1	4.5	17.3	75	0.6	12.0	19.8
Middle	7	31.8	34.5	3,544	28.5	27.8	32.5
Upper	13	59.1	44.1	8,663	69.7	57.7	43.1
Unknown	0	0.0	0.3	0	0.0	0.3	0.3
Total	22	100.0	100.0	12,425	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.9	0	0.0	1.6	4.3
Moderate	0	0.0	10.6	0	0.0	7.8	19.8
Middle	0	0.0	28.0	0	0.0	21.1	32.5
Upper	0	0.0	58.9	0	0.0	68.8	43.1
Unknown	0	0.0	0.6	0	0.0	0.7	0.3
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							**Multifamily Units %**
Low	1	33.3	22.0	2,450	18.7	13.0	17.3
Moderate	0	0.0	29.1	0	0.0	17.5	29.4
Middle	1	33.3	26.9	9,600	73.4	31.9	28.3
Upper	0	0.0	20.3	0	0.0	30.7	23.0
Unknown	1	33.3	1.7	1,032	7.9	6.8	2.1
Total	3	100.0	100.0	13,082	100.0	100.0	100.0
Total Home Mortgage Loans							**Owner Occupied Units %**
Low	4	2.5	3.5	3,020	3.8	3.1	4.3
Moderate	17	10.4	14.9	5,086	6.5	11.2	19.8
Middle	64	39.3	36.0	32,069	40.7	31.5	32.5
Upper	76	46.6	45.3	37,235	47.3	53.1	43.1
Unknown	2	1.2	0.3	1,332	1.7	1.0	0.3
Total	163	100.0	100.0	78,742	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
          2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Small Business Lending

The geographic distribution of small business lending is reasonable. During the review period Susser originated 22.9 percent of small business loans to businesses in LMI census tracts. As

illustrated in Table 10, Susser's performance in low-income census tracts is above the percentage of small businesses located in such geographies, which reflects favorably on the bank. Susser's performance in moderate-income census tracts, at 9.8 percent, is below the percentage of small businesses located in such geographies, at 19.7 percent, reflecting opportunities to lend. However, Susser's lending in moderate-income census tracts is reasonable given the bank's position in the highly competitive DFW market.

Table 10

Geographic Income Level	Bank Loans				Total Businesses (%)
	#	#%	$(000)	$%	
Low	8	13.1	758	4.3	5.2
Moderate	6	9.8	1,777	10.1	19.7
Middle	20	32.8	5,768	32.6	31.0
Upper	27	44.3	9,368	53.0	43.2
Unknown	0	0.0	0	0.0	0.8
Total	61	100.0	17,671	100.0	100.0

Distribution of 2023 Small Business Lending by Income Level of Geography
Assessment Area: DFW Metropolitan

Source: 2023 FFIEC Census Data
          2023 Dun & Bradstreet Data
          2016 – 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

Susser's lending has a reasonable distribution among individuals of different income levels and businesses of different revenue sizes.

Residential Real Estate (HMDA) Lending

The distribution of HMDA lending to borrowers of different income levels is reasonable. Although Susser fell significantly below the demographic figure (percent of families by family income), the bank's lending to LMI borrowers during the review period is comparable to the performance of aggregate lenders in the area. This indicates that factors outside the bank's control prevent lenders from reaching those individuals. LMI families face challenges securing lending due to various reasons, including insufficient downpayment funds, lack of affordable housing in the area, and high interest rates. High interest rates also affect refinance lending, which could be a reason for the significant drop in refinance loans since the previous evaluation. In light of the low loan demand, Susser's performance shows willingness to meet the needs of LMI borrowers in the area.

Table 11

Distribution of 2023 Home Mortgage Lending by Borrower Income Level Assessment Area: DFW Metropolitan							
Borrower Income Level	Bank and Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans							
Low	2	1.5	1.6	678	1.3	0.7	21.9
Moderate	15	11.0	11.4	3,578	6.8	7.1	17.3
Middle	39	28.7	20.0	10,863	20.7	16.2	19.3
Upper	71	52.2	41.0	34,305	65.5	51.8	41.5
Unknown	9	6.6	25.9	2,936	5.6	24.2	0.0
Total	136	100.0	100.0	52,360	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	8.3	0	0.0	4.1	21.9
Moderate	3	13.6	16.7	503	4.0	9.8	17.3
Middle	4	18.2	19.9	719	5.8	14.9	19.3
Upper	13	59.1	40.1	10,993	88.5	51.6	41.5
Unknown	2	9.1	15.0	210	1.7	19.5	0.0
Total	22	100.0	100.0	12,425	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	4.6	0	0.0	2.7	21.9
Moderate	0	0.0	10.3	0	0.0	6.1	17.3
Middle	0	0.0	18.8	0	0.0	12.7	19.3
Upper	0	0.0	63.4	0	0.0	73.0	41.5
Unknown	0	0.0	2.9	0	0.0	5.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							
Low	2	1.3	2.8	678	1.0	1.1	21.9
Moderate	18	11.3	12.0	4,081	6.2	7.3	17.3
Middle	43	26.9	19.8	11,582	17.6	15.9	19.3
Upper	85	53.1	42.2	46,048	70.1	52.3	41.5
Unknown	12	7.5	23.3	3,271	5.0	23.4	0.0
Total	160	100.0	100.0	65,660	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
    2016 – 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.
Multifamily loans are not included in the borrower distribution analysis.

Small Business Lending

The distribution of small business lending among businesses of different revenue sizes is reasonable. As shown in Table 12, 92.6 percent of businesses within the AA reported revenues of $1 million or less. While Susser did not report CRA small business loan data, and its performance is not directly compared to the performance of aggregate lenders, this data point provides context related to the loan demand. During the review period, compiled data related to aggregate lenders reflected 52.4 percent of reported small business loans originated to businesses with annual revenues of $1 million or less, which is comparable to Susser's performance. Additionally, approximately 48.1 of the bank's small business loan originations were made in amounts of $100,000 or less, which reflects a reasonable effort to lend to small businesses as they typically require loans in smaller dollar amounts.

Table 12

Distribution of 2023 Small Business Lending by Revenue Size of Businesses Assessment Area: DFW Metropolitan					
	Bank Loans				Total Businesses %
	#	#%	$(000)	$%	
By Revenue					
$1 Million or Less	20	44.3	6,174	34.9	92.6
Over $1 Million	34	55.7	11,498	65.1	6.3
Revenue Unknown	0	0.0	0	0.0	1.2
Total	61	100.0	17,671	100.0	100.0
By Loan Size					
$100,000 or Less	24	39.3	1,316	7.4	
$100,001 - $250,000	13	21.3	2,628	14.9	
$250,001 - $1 Million	24	39.3	13,728	77.7	
Total	61	100.0	17,671	100.0	
By Loan Size and Revenue $1 Million or Less					
$100,000 or Less	13	48.1	666	10.8	
$100,001 - $250,000	7	25.9	1,425	23.1	
$250,001 - $1 Million	7	25.9	4,083	66.1	
Total	27	100.0	6,174	100.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016 – 2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Response to Complaints

Susser's record of responding to written comments about the bank's performance in helping to meet the credit needs in the DFW Metropolitan AA is appropriate. As discussed previously, the bank's response to the comment letters was appropriate considering the context of the comments.

COMMUNITY DEVELOPMENT TEST

Susser's CD performance demonstrates adequate responsiveness to the needs of the DFW Metropolitan AA, considering the bank's capacity and the availability of such opportunities. The bank addressed CD needs through a combination of qualified loans, investments, and services.

Susser's CD lending volume is significantly less by number volume and dollar amount than the prior evaluation. This decrease is attributed to the ending of the PPP in 2021, in which the bank was heavily involved. While the number of total investments in the AA decreased, the dollar amount increased by over 158.0 percent. Additionally, the number of services drastically decreased, but the number of hours increased 21.1 percent. These changes indicate a more strategic approach to identifying and meeting CD needs in the AA.

Examples of CD activities in the AA include loans for affordable housing, as well as providing credit to small businesses to promote economic development and provide jobs within the AA.

Table 13

Community Development Purpose	Community Development Loans		Qualified Investments							Community Development Services
			Investments		Donations		Total Investments			
	#	$(000)	#	$(000)	#	$(000)	#	$(000)		#
Affordable Housing	2	11,230	0	0	3	3	3	3		0
Community Services	0	0	0	0	22	302	22	302		8
Economic Development	4	11,767	1	1,500	8	8	9	1,508		0
Revitalization and Stabilization	4	13,742	0	0	0	0	0	0		0
Totals	**10**	**36,739**	**1**	**1,500**	**33**	**313**	**34**	**1,813**		**8**

(Table title spanning the top: Community Development Activity — Assessment Area: DFW Metropolitan)

AUSTIN METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)

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

The Austin Metropolitan AA consists of Travis County and Williamson County, which comprise portions of the Austin-Round Rock-Georgetown, Texas MSA. Refer to Appendix A for an AA map and Appendix B for additional demographic data.

- There have not been any changes in the AA since the prior evaluation.
- The bank operates one branch within this AA, which is located in a middle-income census tract.
- According to the ACS, the AA contains a total of 425 census tracts: 27 low-income, 100 moderate-income, 142 middle-income, 140 upper-income, and 16 unknown-income geographies.
- The FDIC's Deposit Market Share Report as of June 30, 2023 notes that 65 federally insured depository institutions operate 372 branches within the AA, holding deposits of $61.0 billion. The bank ranked 32nd in deposit market share, with $209.9 million or 0.3 percent of total deposits. Deposit market share leaders in the AA are JPMorgan Chase Bank, National Association (19.7 percent), Wells Fargo Bank, National Association (16.4 percent), and Bank of America, National Association (13.3 percent).
- In 2023, Susser originated nine HMDA reportable loans, which represents less than 0.1 percent of 49,010 loans extended by aggregate lenders in the AA.
- Examiners interviewed a representative of the community who leads an association of business leaders in the area to ascertain information on the financial climate of the region, particularly with respect to small businesses operating in the AA. The contact noted an ongoing need for fiscal education and credit extension, specifically for small businesses.
- Due to the limited deposit and lending volume as well as branch presence, this AA received less weight in the overall analysis of the bank's performance.

Table 14

Population Change Assessment Area: Austin Metropolitan			
Area	2015 Population	2020 Population	Percent Change
Austin Metropolitan	1,595,237	1,899,205	19.1
Travis County, TX	1,121,645	1,290,188	15.0
Williamson County, TX	473,592	609,017	28.6
Austin-Round Rock-Georgetown, TX MSA	1,889,094	2,283,371	20.9
Texas	26,538,614	29,145,505	9.8
Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census			

- As depicted in Table 14, the AA has seen a significant population increase since 2015, more than doubling the percent change of the state of Texas.
- The community contact attributed the AA's continued population growth to a thriving local economy, bolstered by new employment opportunities.

Table 15

Median Family Income Change Assessment Area: Austin Metropolitan			
Area	2015 Median Family Income ($)	2020 Median Family Income ($)	Percent Change (%)
Austin Metropolitan	87,449	103,525	18.4
Travis County, TX	84,880	103,154	21.5
Williamson County, TX	92,692	104,621	12.9
Austin-Round Rock-Georgetown, TX MSA	86,310	100,215	16.1
Texas	68,523	76,073	11.0
Source: 2011 - 2015 U.S. Census Bureau American Community Survey *2016 - 2020 U.S. Census Bureau American Community Survey* *Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.*			

- As depicted in Table 15, the AA's MFI grew at a higher rate in both counties of the bank's AA compared to the state of Texas. Additionally, the AA MFI remains higher than the statewide figure.
- According to the 2023 FFIEC data, 6.4 percent of the AA families live below the poverty level, which is below the poverty level of Texas at 10.9 percent. This indicates the AA households are generally more affluent than in other areas of the state.
- Although the AA has experienced a significant increase in MFI, the commensurate growth in annual inflation rates has had a strong effect on people and businesses, which negates the impact of such increase, according to a local contact.

Table 16

Housing Cost Burden Rates Assessment Area: Austin Metropolitan						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Austin Metropolitan	84.1	47.2	42.2	70.1	40.0	20.7
Travis County, TX	83.4	47.9	42.6	69.5	39.9	21.6
Williamson County, TX	87.1	44.8	41.0	71.5	40.0	18.8
Austin-Round Rock-Georgetown, TX MSA	82.8	44.6	42.9	67.0	36.6	20.4
Texas	78.3	44.6	42.7	57.3	31.0	19.0
Cost burden is housing cost that equals 30 percent or more of household income. *Source: U.S. Department of Housing and Urban Development (HUD)* *2016 – 2020 Comprehensive Housing Affordability Strategy*						

- Throughout the AA, LMI renters utilize a larger percentage of their income for housing than LMI homeowners, indicating that it is more economical for LMI families to purchase a home than to rent it. However, other factors, such as downpayment requirements and high property tax rates, act as a barrier to enter homeownership for many LMI individuals and families.
- According to 2023 FFIEC Census data, the AA median gross rent is $1,353. The median age of housing stock in the AA is 33 years, which is the same for the state of Texas, and the AA median housing value is $321,002. An older median age of housing stock can indicate a lag in residential construction to keep up with demand and a growing need for home improvement lending. Rising home prices and high interest rates encourage homeowners to spend more on home improvement.

- The AA housing affordability ratio, at 25.9 percent, is below the statewide ratio of 34.1 percent, indicating housing in the AA is less affordable than statewide housing.
- The community contact noted that while the economy is doing well overall, the suburban areas are growing faster than the main city.

Table 17

Unemployment Rates Assessment Area: Austin Metropolitan					
Area	2019	2020	2021	2022	2023
Austin Metropolitan	2.7	6.2	4.0	2.9	3.4
Travis County, TX	2.6	6.4	4.1	2.8	3.3
Williamson County, TX	2.8	5.8	4.0	2.9	3.4
Austin-Round Rock-Georgetown, TX MSA	2.7	6.2	4.1	2.9	3.4
Texas	3.5	7.7	5.6	3.9	3.9
Source: Bureau of Labor Statistics (BLS): Local Area Unemployment Statistics					

- As depicted in Table 17, the AA unemployment rates declined in 2021 and 2022 after facing a sharp increase due to the COVID-19 pandemic in 2020. The AA unemployment rate has stabilized and returned to pre-pandemic levels.
- Despite the substantial influx of new residents, the AA unemployment rates have consistently remained below the statewide unemployment rates, indicating that sufficient opportunity exists in the AA job market to absorb the population growth.
- The top three industries in the AA include professional and technical services, health care and social assistance, and accommodation and food services.
- The University of Texas at Austin remains a key employer in the AA, along with H-E-B, Dell Technologies and Ascension Texas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE AUSTIN METROPOLITAN ASSESSMENT AREA

LENDING TEST

During the review period, Susser originated nine home mortgage loans and four small business loans in the AA. The limited volume of lending does not to allow for a meaningful analysis of the bank's lending. As a result, the bank's geographic distribution of loans and lending to borrowers of different income levels and businesses of different revenue sizes were not evaluated as part of Susser's overall lending performance in the AA.

Geographic Distribution of Loans

As noted in Tables 18 and 19, Susser originated a limited volume of home mortgage and small business loans in the AA during the review period to conduct a meaningful analysis. As such, this criterion was not evaluated.

Table 18

Distribution of 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Austin Metropolitan						
Geographic Income Level	Bank And Aggregate Loans					Owner Occupied Units %
	Bank		Agg	Bank		Agg
	#	#%	#%	$(000)	$%	$%
Home Purchase Loans						
Low	0	0.0	1.8	0	0.0	1.5	2.6
Moderate	1	12.5	21.4	314	3.7	17.5	17.6
Middle	3	37.5	40.7	1,216	14.3	34.8	37.6
Upper	4	50.0	35.4	6,950	82.0	45.7	41.8
Unknown	0	0.0	0.7	0	0.0	0.5	0.5
Total	8	100.0	100.0	8,480	100.0	100.0	100.0
Refinance Loans						
Low	0	0.0	2.8	0	0.0	2.1	2.6
Moderate	0	0.0	18.1	0	0.0	13.2	17.6
Middle	1	100.0	38.5	188	100.0	28.1	37.6
Upper	0	0.0	40.1	0	0.0	55.8	41.8
Unknown	0	0.0	0.5	0	0.0	0.7	0.5
Total	1	100.0	100.0	188	100.0	100.0	100.0
Home Improvement Loans						
Low	0	0.0	1.2	0	0.0	0.9	2.6
Moderate	0	0.0	12.3	0	0.0	7.7	17.6
Middle	0	0.0	35.2	0	0.0	22.8	37.6
Upper	0	0.0	51.1	0	0.0	68.4	41.8
Unknown	0	0.0	0.2	0	0.0	0.2	0.5
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans						**Multi-family Units %**
Low	0	0.0	7.5	0	0.0	5.2	12.0
Moderate	0	0.0	26.3	0	0.0	24.6	27.5
Middle	0	0.0	37.5	0	0.0	33.2	30.0
Upper	0	0.0	21.3	0	0.0	31.7	27.1
Unknown	0	0.0	7.5	0	0.0	5.3	3.4
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans						**Owner Occupied Units %**
Low	0	0.0	1.9	0	0.0	1.9	2.6
Moderate	1	11.1	20.4	314	3.6	17.5	17.6
Middle	4	44.4	40.1	1,404	16.2	33.6	37.6
Upper	4	44.4	37.0	6,950	80.2	46.0	41.8
Unknown	0	0.0	0.7	0	0.0	1.0	0.5
Total	9	100.0	100.0	8,668	100.0	100.0	100.0
Source: 2023 FFIEC Census Data 　　　　2016-2020 U.S. Census Bureau: American Community Survey						
Note:　Percentages may not total 100.0 percent due to rounding.						

Table 19

	Bank And Aggregate Loans						Total Businesses %
Geographic Income Level	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	3.4	0	0.0	3.5	3.7
Moderate	1	25.0	17.2	574	55.8	18.3	17.3
Middle	1	25.0	30.2	35	3.4	28.2	29.1
Upper	2	50.0	46.8	420	40.8	47.1	47.0
Unknown	0	0.0	2.0	0	0.0	2.8	2.8
Total	4	100.0	100.0	1,029	100.0	100.0	100.0

"Distribution of 2023 Small Business Lending By Income Level of Geography — Assessment Area: Austin Metropolitan"

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

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

Tables 20 and 21 illustrate the limited volume of home mortgage and small business loans originated by the bank in the AA during the review period. Given that the volume of lending is insufficient to conduct a meaningful analysis; this criterion was not evaluated.

Table 20

Distribution of 2023 Home Mortgage Lending By Borrower Income Level Assessment Area: Austin Metropolitan						
Borrower Income Level	Bank And Aggregate Loans					Families by Family Income
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	%
Home Purchase Loans							
Low	0	0.0	2.2	0	0.0	0.9	20.4
Moderate	2	25.0	11.4	585	6.9	7.4	16.8
Middle	1	12.5	20.0	396	4.7	16.6	20.8
Upper	5	62.5	39.5	7,499	88.4	49.3	42.0
Unknown	0	0.0	26.8	0	0.0	25.8	0.0
Total	8	100.0	100.0	8,480	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	8.9	0	0.0	4.2	20.4
Moderate	1	100.0	17.3	188	100.0	9.2	16.8
Middle	0	0.0	21.6	0	0.0	14.4	20.8
Upper	0	0.0	38.8	0	0.0	52.3	42.0
Unknown	0	0.0	13.4	0	0.0	19.9	0.0
Total	1	100.0	100.0	188	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	6.2	0	0.0	2.8	20.4
Moderate	0	0.0	13.9	0	0.0	6.5	16.8
Middle	0	0.0	20.7	0	0.0	11.9	20.8
Upper	0	0.0	57.6	0	0.0	72.7	42.0
Unknown	0	0.0	1.6	0	0.0	6.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	3.3	0	0.0	1.3	20.4
Moderate	3	33.3	12.2	773	8.9	7.4	16.8
Middle	1	11.1	20.2	396	4.6	16.1	20.8
Upper	5	55.6	40.4	7,499	86.5	50.1	42.0
Unknown	0	0.0	24.0	0	0.0	25.1	0.0
Total	9	100.0	100.0	8,668	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2016-2020 U.S. Census Bureau: American Community Survey

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

Table 21

Distribution of 2023 Small Business Lending By Revenue Size of Businesses Assessment Area: Austin Metropolitan						
	Bank And Aggregate Loans					**Total Businesses %**
	Bank	**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	
By Revenue						
$1 Million or Less	3	75.0	52.1	792	77.0	34.1	92.6
Over $1 Million	1	25.0		237	23.0		6.0
Revenue Unknown	0	0.0		0	0.0		1.4
Total	4	100.0		1,029	100.0		100.0
By Loan Size						
$100,000 or Less	1	25.0	95.2	35	3.4	45.4	
$100,001 - $250,000	2	50.0	2.7	420	40.8	14.9	
$250,001 - $1 Million	1	25.0	2.2	574	55.8	39.6	
Total	4	100.0	100.0	1,029	100.0	100.0	
By Loan Size and Revenues $1 Million or Less						
$100,000 or Less	1	33.3		35	4.4		
$100,001 - $250,000	1	33.3		183	23.1		
$250,001 - $1 Million	1	33.3		574	72.5		
Total	3	100.0		792	100.0		

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

COMMUNITY DEVELOPMENT TEST

Susser's CD performance demonstrates poor responsiveness due to the limited CD activity in the AA. Notably, several of the bank's CD activities benefits all the bank's AAs and are reflected in Susser's overall numbers and not solely for the Austin Metropolitan AA. While Susser has only one branch and a limited market share in the AA, the CD activity for the review period is very low, as shown in the Table 22.

Table 22

Community Development Activity Assessment Area: Austin Metropolitan									
Community Development Purpose	**Community Development Loans**		**Qualified Investments**						**Community Development Services**
			Investments		**Donations**		**Total Investments**		
	#	$(000)	#	$(000)	#	$(000)	#	$(000)	#
Affordable Housing	0	0	0	0	0	0	0	0	0
Community Services	1	2,000	0	0	0	0	0	0	1
Economic Development	0	0	0	0	2	2	2	2	0
Revitalization and Stabilization	0	0	0	0	0	0	0	0	0
Totals	**1**	**2,000**	**0**	**0**	**2**	**2**	**2**	**2**	**1**

LIMITED-SCOPE REVIEW METROPOLITAN ASSESSMENT AREAS

DESCRIPTION OF THE INSTITUTION'S OPERATIONS

Houston Metropolitan Assessment Area
- The Houston Metropolitan AA includes all of Harris County, which is a portion of the Houston-The Woodlands-Sugar Land, Texas MSA. Refer to Appendix A for an AA map, Appendix C for AA demographic data, and Appendix E for AA lending tables.
- The AA is comprised of 1,115 census tracts: 202 low-income, 313 moderate-income, 272 middle-income, 290 upper-income, and 38 unknown-income census tracts.
- The bank operates one branch in the AA, which opened on March 7, 2023, in an upper-income census tract. This branch offers lobby service and one full-service ATM. The AA was added when this branch opened.
- The population of the AA grew by 8.6 percent between 2015 and 2020, adding approximately 375,000 residents during that period.
- According to the FDIC's Market Share Report as of June 30, 2023, the bank had 0.1 percent market share, ranking 46th of 84 FDIC-insured depository institutions operating 879 branches in the AA. Moreover, Susser had $225.3 million deposits in the AA, representing 12.4 percent of the bank's total deposits. The bank's lending in this AA is limited, representing 2.0 percent of total loan volume.
- Given Susser's limited lending in the AA and the brief time the branch has been in service, the bank's performance in this AA carried the least weight when rating overall performance in meeting the credit and CD needs of the communities served.

San Antonio Metropolitan Assessment Area
- The San Antonio Metropolitan AA includes all of Bexar County, which is a portion of the San Antonio-New Braunfels, Texas MSA. Refer to Appendix A for an AA map, Appendix C for AA demographic data, and Appendix E for AA lending tables.
- The AA is comprised of 375 census tracts: 35 low-income, 137 moderate-income, 102 middle-income, 97 upper-income, and four unknown-income census tracts.
- Susser operates one branch in the AA, which is located in an upper-income census tract and offers lobby service and one full-service ATM. The bank did not open or close any branches in the AA since the previous evaluation.
- As of the 2020, the AA has a population of just over two million residents, which is up 10.1 percent from 2015.
- According to the FDIC's Market Share Report as of June 30, 2023, the bank had a 0.1 percent market share, ranking 24th of 48 FDIC-insured depository institutions operating 284 branches in the AA. Moreover, Susser had $113.3 million deposits in the AA, representing 6.3 percent of the bank's total deposits. The bank's lending in this AA is limited, representing 2.0 percent of total loan volume.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS
Conclusions regarding Susser's CRA performance are drawn from a review of available data, including performance figures, aggregate lending comparisons, and demographic information.

During the review period, Susser did not originate a sufficient volume of home mortgage or small business loans to allow for a meaningful analysis in either AA reviewed using limited-scope procedures. The CD performance in these areas is below the bank's CD performance overall; however, it does not change Susser's rating overall.

APPENDIX A – MAP OF THE ASSESSMENT AREAS

DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA
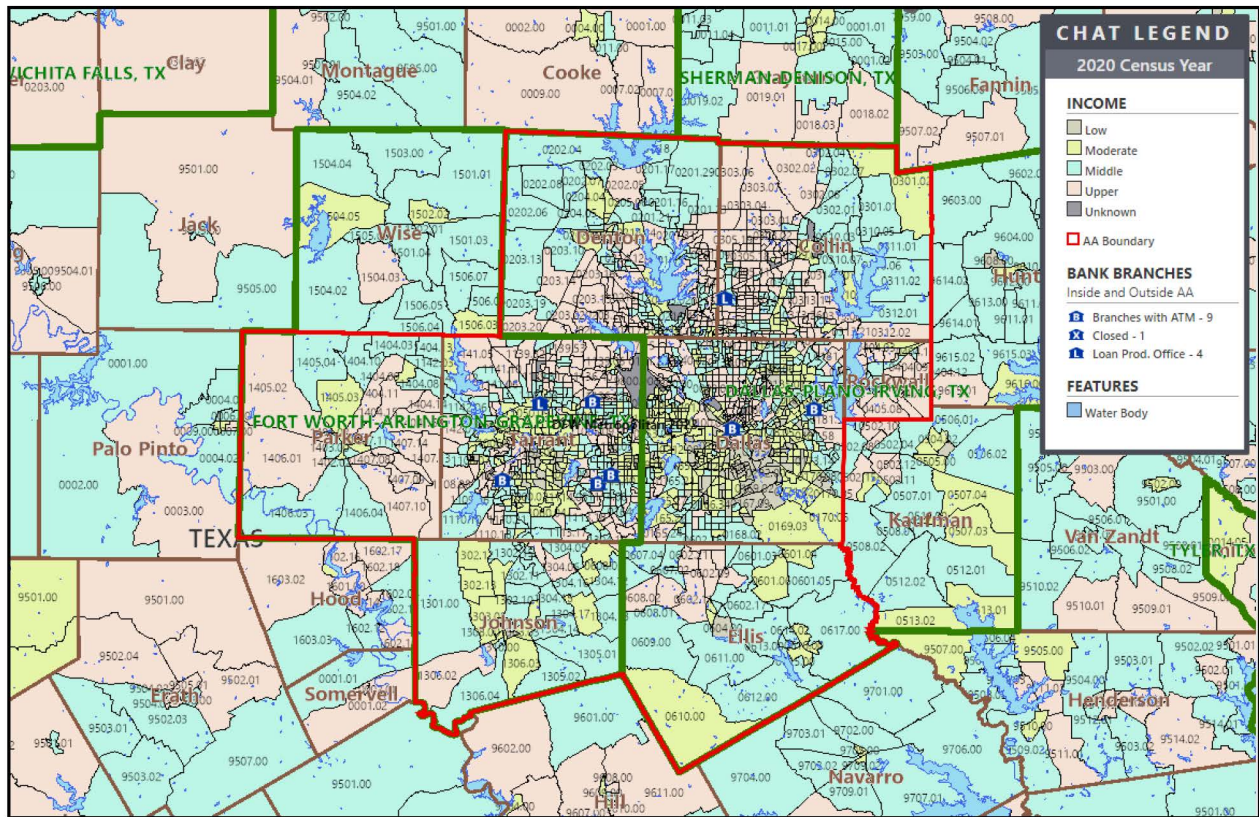
AUSTIN METROPOLITAN ASSESSMENT AREA
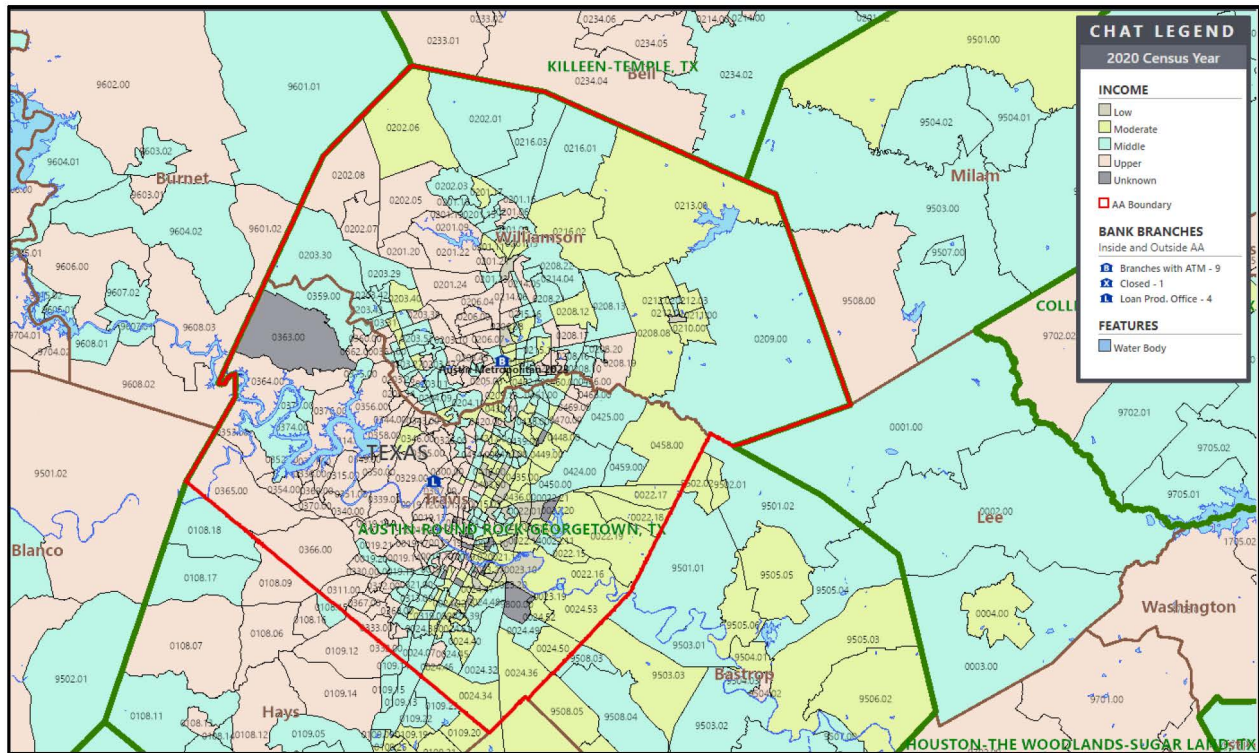
HOUSTON METROPOLITAN ASSESSMENT AREA
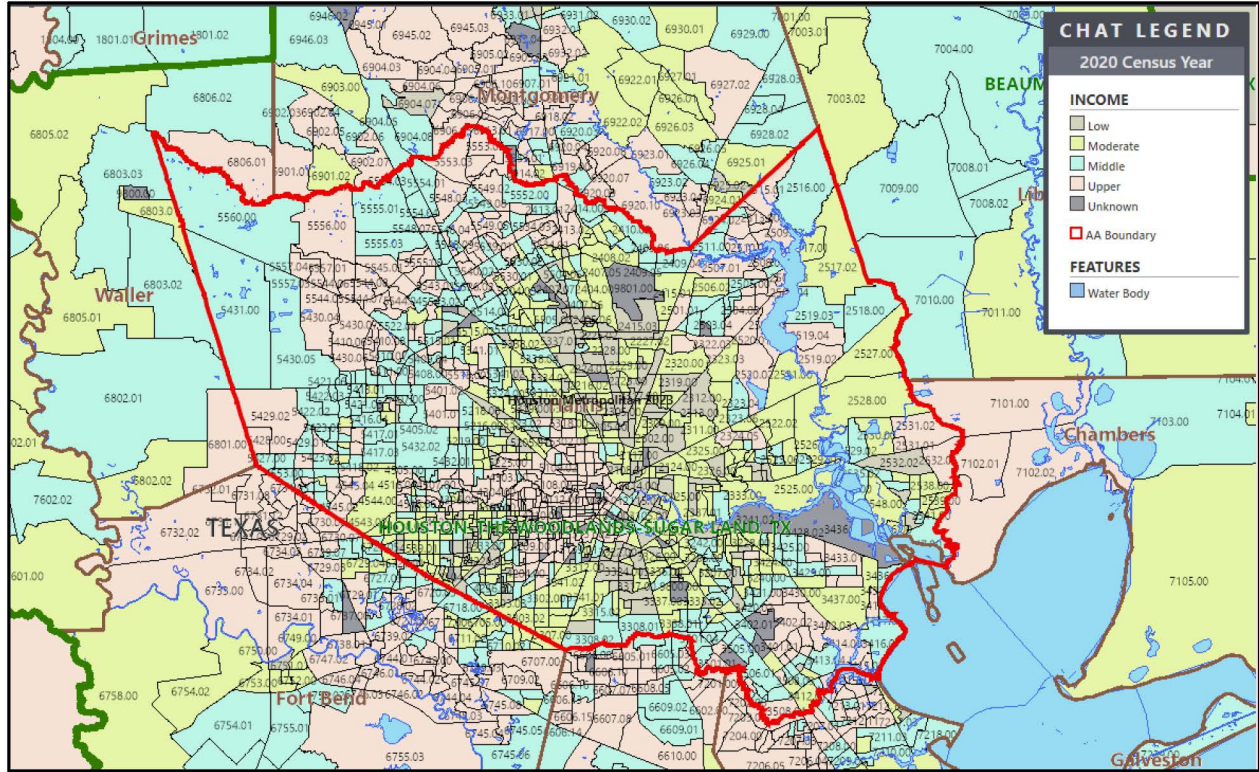
SAN ANTONIO METROPOLITAN ASSESSMENT AREA
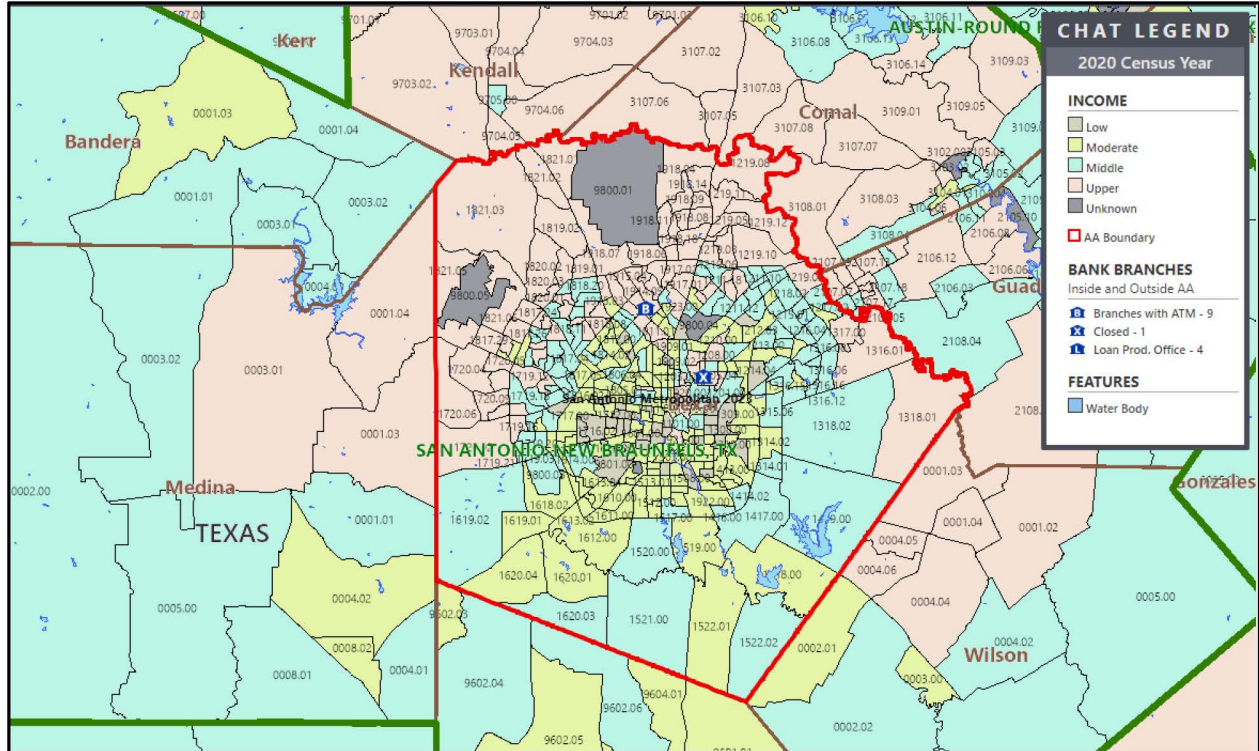
APPENDIX B – FULL-SCOPE ASSESSMENT AREAS DEMOGRAPHIC INFORMATION

DALLAS-FORT WORTH METROPOLITAN ASSESSMENT AREA

Table B-1

2023 AA Combined Demographics Assessment Area: DFW Metropolitan								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	151	9.2	134,029	7.7	34,752	25.9	380,228	21.9
Moderate	427	26.0	414,884	23.9	56,502	13.6	300,724	17.3
Middle	486	29.6	540,799	31.1	31,876	5.9	334,752	19.3
Upper	552	33.7	639,385	36.8	17,533	2.7	721,629	41.5
Unknown	24	1.5	8,236	0.5	1,272	15.4	0	0.0
Total AA	**1,640**	**100.0**	**1,737,333**	**100.0**	**141,935**	**8.2**	**1,737,333**	**100.0**

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	250,596	63,421	4.3	25.3	159,454	63.6	27,721	11.1
Moderate	682,056	295,141	19.8	43.3	330,895	48.5	56,020	8.2
Middle	847,578	484,488	32.5	57.2	307,349	36.3	55,741	6.6
Upper	911,677	641,722	43.1	70.4	217,742	23.9	52,213	5.7
Unknown	23,757	5,212	0.3	21.9	15,068	63.4	3,477	14.6
Total AA	**2,715,664**	**1,489,984**	**100.0**	**54.9**	**1,030,508**	**37.9**	**195,172**	**7.2**

|	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	20,386	5.2	18,703	5.2	1,548	6.3	135	2.9
Moderate	77,141	19.7	70,753	19.5	5,769	23.6	619	13.5
Middle	121,201	31.0	112,513	31.1	7,522	30.8	1,166	25.4
Upper	169,109	43.2	157,225	43.4	9,238	37.8	2,646	57.6
Unknown	3,199	0.8	2,790	0.8	380	1.6	29	0.6
Total AA	**391,036**	**100.0**	**361,984**	**100.0**	**24,457**	**100.0**	**4,595**	**100.0**
Percentage of Total Businesses:			**92.6**		**6.3**		**1.2**	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	71	2.1	70	2.1	1	2.4	0	0.0
Moderate	427	12.6	419	12.5	8	19.0	0	0.0
Middle	1,217	35.9	1,203	35.9	13	31.0	1	33.3
Upper	1,661	49.0	1,639	49.0	20	47.6	2	66.7
Unknown	17	0.5	17	0.5	0	0.0	0	0.0
Total AA	**3,393**	**100.0**	**3,348**	**100.0**	**42**	**100.0**	**3**	**100.0**
Percentage of Total Farms:			**98.7**		**1.2**		**0.1**	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

AUSTIN METROPOLITAN ASSESSMENT AREA

Table B-2

2023 AA Combined Demographics Assessment Area: Austin Metropolitan								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	27	6.4	21,562	5.2	5,043	23.4	84,820	20.4
Moderate	100	23.5	88,697	21.3	9,409	10.6	70,060	16.8
Middle	142	33.4	148,541	35.7	7,483	5.0	86,524	20.8
Upper	140	32.9	154,103	37.0	3,732	2.4	174,832	42.0
Unknown	16	3.8	3,333	0.8	868	26.0	0	0.0
Total AA	425	100.0	416,236	100.0	26,535	6.4	416,236	100.0

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	46,024	9,969	2.6	21.7	31,665	68.8	4,390	9.5
Moderate	168,410	68,287	17.6	40.5	88,696	52.7	11,427	6.8
Middle	257,600	145,995	37.6	56.7	95,133	36.9	16,472	6.4
Upper	245,168	162,416	41.8	66.2	67,066	27.4	15,686	6.4
Unknown	11,984	2,028	0.5	16.9	8,389	70.0	1,567	13.1
Total AA	729,186	388,695	100.0	53.3	290,949	39.9	49,542	6.8

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	3,983	3.7	3,604	3.7	335	5.3	44	2.9
Moderate	18,351	17.3	16,846	17.1	1,330	21.0	175	11.7
Middle	30,936	29.1	28,869	29.3	1,749	27.6	318	21.3
Upper	49,994	47.0	46,443	47.2	2,646	41.7	905	60.6
Unknown	3,027	2.8	2,697	2.7	278	4.4	52	3.5
Total AA	106,291	100.0	98,459	100.0	6,338	100.0	1,494	100.0
Percentage of Total Businesses:			92.6		6.0		1.4	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	29	2.7	27	2.5	2	20.0	0	0.0
Moderate	210	19.6	204	19.2	6	60.0	0	0.0
Middle	321	30.0	321	30.3	0	0.0	0	0.0
Upper	497	46.4	496	46.7	1	10.0	0	0.0
Unknown	14	1.3	13	1.2	1	10.0	0	0.0
Total AA	1,071	100.0	1,061	100.0	10	100.0	0	0.0
Percentage of Total Farms:			99.1		0.9		0.0	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX C – LIMITED-SCOPE ASSESSMENT AREAS DEMOGRAPHIC INFORMATION

HOUSTON METROPOLITAN ASSESSMENT AREA

Table C-1

2023 AA Combined Demographics — Assessment Area: Houston Metropolitan								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	202	18.1	159,678	14.3	51,913	32.5	303,160	27.2
Moderate	313	28.1	299,827	26.9	49,625	16.6	198,347	17.8
Middle	272	24.4	315,421	28.3	24,180	7.7	198,771	17.9
Upper	290	26.0	322,451	29.0	11,140	3.5	413,159	37.1
Unknown	38	3.4	16,060	1.4	4,158	25.9	0	0.0
Total AA	**1,115**	**100.0**	**1,113,437**	**100.0**	**141,016**	**12.7**	**1,113,437**	**100.0**

	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	282,857	67,198	7.5	23.8	179,954	63.6	35,705	12.6
Moderate	482,547	210,152	23.4	43.6	228,193	47.3	44,202	9.2
Middle	475,793	276,474	30.8	58.1	165,246	34.7	34,073	7.2
Upper	512,419	334,727	37.3	65.3	138,101	27.0	39,591	7.7
Unknown	41,603	9,362	1.0	22.5	26,342	63.3	5,899	14.2
Total AA	**1,795,219**	**897,913**	**100.0**	**50.0**	**737,836**	**41.1**	**159,470**	**8.9**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	28,302	11.7	25,551	11.5	2,583	14.0	168	6.5
Moderate	55,849	23.0	50,766	22.9	4,690	25.4	393	15.3
Middle	60,810	25.1	56,507	25.5	3,806	20.6	497	19.3
Upper	92,612	38.2	84,303	38.1	6,854	37.2	1,455	56.5
Unknown	4,922	2.0	4,356	2.0	502	2.7	64	2.5
Total AA	**242,495**	**100.0**	**221,483**	**100.0**	**18,435**	**100.0**	**2,577**	**100.0**
Percentage of Total Businesses:			**91.3**		**7.6**		**1.1**	

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	63	5.1	60	5.0	3	11.1	0	0.0
Moderate	191	15.4	179	14.8	12	44.4	0	0.0
Middle	272	22.0	267	22.1	4	14.8	1	100.0
Upper	694	56.1	687	56.8	7	25.9	0	0.0
Unknown	18	1.5	17	1.4	1	3.7	0	0.0
Total AA	**1,238**	**100.0**	**1,210**	**100.0**	**27**	**100.0**	**1**	**100.0**
Percentage of Total Farms:			**97.7**		**2.2**		**0.1**	

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

SAN ANTONIO METROPOLITAN ASSESSMENT AREA

Table C-2

2023 AA Combined Demographics								
Assessment Area: San Antonio Metropolitan								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	35	9.3	28,772	6.8	9,445	32.8	100,692	23.9
Moderate	137	36.5	140,036	33.2	25,471	18.2	75,243	17.9
Middle	102	27.2	122,558	29.1	10,332	8.4	82,565	19.6
Upper	97	25.9	129,905	30.8	4,711	3.6	162,771	38.6
Unknown	4	1.1	0	0.0	0	0.0	0	0.0
Total AA	**375**	**100.0**	**421,271**	**100.0**	**49,959**	**11.9**	**421,271**	**100.0**
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	52,666	18,604	4.9	35.3	28,356	53.8	5,706	10.8
Moderate	249,019	112,263	29.8	45.1	114,098	45.8	22,658	9.1
Middle	197,875	115,454	30.6	58.3	70,007	35.4	12,414	6.3
Upper	200,086	130,734	34.7	65.3	55,045	27.5	14,307	7.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**699,646**	**377,055**	**100.0**	**53.9**	**267,506**	**38.2**	**55,085**	**7.9**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low	5,271	6.4	4,662	6.1	567	11.3	42	5.5
Moderate	22,765	27.8	21,011	27.6	1,621	32.4	133	17.4
Middle	20,987	25.6	19,650	25.8	1,180	23.6	157	20.5
Upper	32,650	39.9	30,632	40.3	1,588	31.8	430	56.1
Unknown	179	0.2	133	0.2	42	0.8	4	0.5
Total AA	**81,852**	**100.0**	**76,088**	**100.0**	**4,998**	**100.0**	**766**	**100.0**
Percentage of Total Businesses:			**93.0**		**6.1**			**0.9**
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low	13	1.7	13	1.8	0	0.0	0	0.0
Moderate	143	19.2	141	19.1	2	22.2	0	0.0
Middle	168	22.5	166	22.5	2	22.2	0	0.0
Upper	422	56.6	417	56.6	5	55.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**746**	**100.0**	**737**	**100.0**	**9**	**100.0**	**0**	**0.0**
Percentage of Total Farms:			**98.8**		**1.2**			**0.0**
Source: 2023 FFIEC Census Data								
2023 Dun & Bradstreet Data								
2016-2020 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

APPENDIX D – LIMITED-SCOPE REVIEW ASSESSMENT AREA TABLES

HOUSTON METROPOLITAN ASSESSMENT AREA

Table D-1

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	1	16.7	10.6	750	25.0	11.6	11.7
Moderate	1	16.7	21.9	25	0.8	24.4	23.0
Middle	0	0.0	25.4	0	0.0	22.8	25.1
Upper	4	66.7	39.8	2,228	74.2	39.0	38.2
Unknown	0	0.0	1.9	0	0.0	2.1	2.0
Total	6	100.0	100.0	3,003	100.0	100.0	100.0

Distribution of 2023 Small Business Lending By Income Level of Geography
Assessment Area: Houston Metropolitan

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-2

Distribution of 2023 Small Business Lending By Revenue Size of Businesses
Assessment Area: Houston Metropolitan

	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	1	16.7	51.4	250	8.3	31.6	91.3
Over $1 Million	5	83.3		2,753	91.7		7.6
Revenue Unknown	0	0.0		0	0.0		1.1
Total	6	100.0		3,003	100.0		100.0
By Loan Size							
$100,000 or Less	1	16.7	94.2	25	0.8	39.9	
$100,001 - $250,000	1	16.7	3.1	250	8.3	15.6	
$250,001 - $1 Million	4	66.7	2.7	2,728	90.8	44.5	
Total	6	100.0	100.0	3,003	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	0	0.0		0	0.0		
$100,001 - $250,000	1	100.0		250	100.0		
$250,001 - $1 Million	0	0.0		0	0.0		
Total	1	100.0		250	100.0		

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

SAN ANTONIO METROPOLITAN ASSESSMENT AREA

Table D-3

	Bank And Aggregate Loans						Total Businesses %
Distribution of 2023 Small Business Lending By Income Level of Geography							
Assessment Area: San Antonio Metropolitan							
Geographic Income Level	Bank		Agg	Bank		Agg	Total Businesses %
	#	#%	#%	$(000)	$%	$%	
Low	1	16.7	5.5	175	6.1	8.0	6.4
Moderate	1	16.7	24.2	500	17.5	24.5	27.8
Middle	1	16.7	23.7	750	26.3	21.5	25.6
Upper	3	50.0	46.1	1,430	50.1	45.7	39.9
Unknown	0	0.0	0.2	0	0.0	0.3	0.2
Total	6	100.0	100.0	2,855	100.0	100.0	100.0

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-4

	Bank And Aggregate Loans						Total Businesses %
Distribution of 2023 Small Business Lending By Revenue Size of Businesses							
Assessment Area: San Antonio Metropolitan							
	Bank		Agg	Bank		Agg	Total Businesses %
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	3	50.0	49.7	1,225	42.9	28.9	93.0
Over $1 Million	3	50.0		1,630	57.1		6.1
Revenue Unknown	0	0.0		0	0.0		0.9
Total	6	100.0		2,855	100.0		100.0
By Loan Size							
$100,000 or Less	0	0.0	93.6	0	0.0	36.4	
$100,001 - $250,000	2	33.3	3.4	305	10.7	16.1	
$250,001 - $1 Million	4	66.7	3.1	2,550	89.3	47.4	
Total	6	100.0	100.0	2,855	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	0	0.0		0	0.0		
$100,001 - $250,000	1	33.3		175	14.3		
$250,001 - $1 Million	2	66.7		1,050	85.7		
Total	3	100.0		1,225	100.0		

Source: 2023 FFIEC Census Data
2023 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

APPENDIX E – Glossary

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

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

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

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

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

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

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

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

loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

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

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

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

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

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

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

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

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

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

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

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

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area. For these institutions, no state ratings will be received unless the bank also maintains deposit facilities outside of the multistate metropolitan area. CRA activity is captured in either a state rating or a multistate metropolitan area rating, but not both.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of $1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as 'small business loans' if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the Consolidated Reports of Condition and Income (Call Report) instructions. These loans have original amounts of $500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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