



PUBLIC DISCLOSURE

July 12, 2022

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

First Commercial Bank, National Association
Charter Number: 17862

1336 East Court Street
Seguin, TX 78155

Office of the Comptroller of the Currency
San Antonio Office
10001 Reunion Place, Suite 250
San Antonio, TX 78216

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

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

The lending test is rated: Satisfactory

The community development (CD) test is rated: Satisfactory

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable.
- A majority of loans are inside its assessment areas (AAs).
- The bank demonstrated a reasonable distribution of loans by income level of geography.
- The bank exhibits reasonable distribution of loans to individuals of different income levels and to businesses of different sizes.
- The CD test is satisfactory based on the level of CD loans and services meeting the needs of the AAs.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is reasonable.

The quarterly average LTD ratio is reasonable and reflects satisfactory performance. First Commercial Bank's (FCB) average LTD ratio for the 13 quarters since the prior CRA exam is 61.42 percent and is consistent with the LTD ratio of 61 percent at the previous examination. Quarterly LTD ratios have ranged from a high of 69 percent as of March 31, 2019, to a low of 53 percent as of September 30, 2021.

Our analysis compared FCB to three similarly situated institutions to assess performance. The quarterly LTD ratio for these institutions is 69.70 percent. The quarterly LTD ratios for the other institutions ranged from an average low of 61.30 percent to an average high of 76.24 percent.

Lending in Assessment Area

A majority of the bank's loans are inside its AAs.

The bank originated 79 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank level, rather than the AA level. The bank did not have any affiliate lending activities included in this assessment.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	199	79.3	52	20.7	251	58,826	75.1	19,483	24.9	78,309
Commercial	43	75.4	14	24.6	57	10,414	81.7	2,334	18.3	12,748
Total	242	78.6	66	21.4	308	69,240	76.0	21,817	24.0	91,057
<i>Source: Bank Data</i>										
<i>Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

FCB is a full-service, single-state community bank headquartered in Seguin, Texas, which is approximately 35 miles east of San Antonio, Texas. FCB is owned by First Commercial Financial Corporation, Inc., a locally owned, one-bank holding company. The OCC did not review any affiliate activities during this evaluation.

FCB's only rating area is Texas. The bank's two AAs include seven full-service branches, with one branch located in the Frio County AA and six branches located in the San Antonio-New Braunfels AA. Each branch contains an automated teller machine (ATM). The bank also offers 24-hour telebanking, online banking services, and traditional deposit products. Since the previous CRA evaluation, the bank has not engaged in any mergers or acquisitions and has not closed any branches.

As of December 31, 2021, the bank reported total assets of \$530 million, including net loans and leases of \$271 million, and tier 1 capital of \$39 million. The loan portfolio represents 51 percent of total assets and 56 percent of total deposits. The loan portfolio is composed of \$150.5 million in commercial, \$97.2 million in residential real estate, \$13.4 million in agriculture, and \$4.7 million in consumer credits. By percent of total loans, the portfolio is 57 percent commercial, 37 percent residential real estate, five percent agriculture, and two percent consumer.

In response to the Coronavirus Aid, Relief, and Economic Security Act or CARES Act established in 2020, FCB participated in the Small Business Administrations' Paycheck Protection Program (PPP). These loans were designed to provide a direct incentive for small businesses to keep their workers on payroll during the COVID pandemic. The bank originated 209 PPP loans totaling \$20.4 million between 2020 and 2021.

Based on the bank's financial condition, size, product offerings, and branch network, there are no legal, financial, or other factors that inhibit FCB's ability to help meet credit needs within its AAs. The prior examination dated April 15, 2019, assigned an overall "Satisfactory" rating to FCB's CRA performance.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated FCB's CRA performance using the Intermediate Small Bank examination procedures, which includes a lending test and CD test. As noted above, the bank's two primary lending products

consisted of their commercial lending and residential real estate lending which account for 94 percent of their loan portfolio. The evaluation period covered loans originated from January 1, 2019, through December 31, 2021. We tested mortgage loan data reported under the Home Mortgage Disclosure Act (HMDA) from 2019 through 2021 to verify accuracy of reported data and found the data reliable for use in this evaluation.

To evaluate lending performance, we used the HMDA data and selected a random sample of loans to small businesses. We also evaluated CD loans, investments, and CD services. For the geographic and borrower distribution analyses, we compared lending performance data to updated 2015 American Community Survey census data effective January 2017.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is limited to the state of Texas, as FCB only has branches in Texas. The state rating is based on performance in all bank AAs. We performed a full-scope review of the San Antonio – New Braunfels AA which is weighted more than the limited-scope review of the Frio County AA. Our analysis of lending activity focused on commercial lending and residential real estate as they represent the primary lending products by dollar volume during the evaluation period. However, more weight is given to commercial lending as those credits represent a larger percentage of the bank's portfolio. Refer to the "Scope" section under the State Rating section for details regarding how the areas and lending products were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) in determining a national bank's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

State of Texas

CRA rating for the State of Texas: Satisfactory

The lending test is rated: Satisfactory

The community development test is rated: Satisfactory

The major factors that support this rating include:

- The bank's LTD ratio is reasonable.
- A majority of the bank's loans are inside its AA.
- The bank demonstrated a reasonable distribution of loans by income level of geography.
- The bank exhibits reasonable distribution of loans to individuals of different income levels and to businesses of different sizes.
- The CD test is satisfactory based on the level of CD loans and services within the bank's AAs.

Description of Institution's Operations in Texas

FCB operates seven locations, including its main office, in two AAs in the state of Texas. Six banking centers (86 percent) are in the San Antonio – New Braunfels AA and one banking center (14 percent) is in the Frio County AA. As of the current evaluation, the San Antonio – New Braunfels AA consists of 95 percent of the bank's deposits and 99 percent of lending. While the Frio County AA consists of five percent of the bank's deposits and one percent of the lending.

Community Contacts

We reviewed six community contacts in Texas to determine the credit and CD needs within the AAs. Contacts include organizations that primarily focus on economic development, affordable housing, CD, and community services. The primary need identified included affordable housing while noting banking needs are met with local financial institutions involvement in their communities.

San Antonio – New Braunfels AA

The AA includes all of Atascosa, Bexar, Comal, and Guadalupe counties. We combined the counties for analytical purposes as they are all part of the San Antonio – New Braunfels MSA. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies.

The June 30, 2021, San Antonio – New Braunfels AA FDIC Market Share report includes 56 financial institutions and a total of \$6.9 billion in deposits. FCB ranks 19 in the deposit market share report and accounts for 0.25 percent of market share with \$417 million in AA deposits. The competition in the San Antonio – New Braunfels AA is fierce, as FCB faces opposition from numerous large, regional, and community banks.

According to Moody's analytics, the San Antonio – New Braunfels economy has recovered steadily with job gains as total employment returned to its early-2020 level. Top employers in the AA include Joint (Military) Base San Antonio (75,972 employees); Financial Services (29,473 employees); H.E.B (22,000 employees); and Healthcare systems (18,752 employees). Additionally, new permits for single-family homes are up to 90 percent of their level at the time of the last peak in 2005. However, the increase in house prices to date has already led to a 15 percent decline in affordability within the past two years.

Mortgage rates have now risen sharply to 5 percent, their highest point since 2018; they could rise even more as the Federal Reserve fights inflation, further eroding affordability.

Table A – Demographic Information of the Assessment Area						
Assessment Area: San Antonio-New Braunfels MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	427	8.0	32.6	27.6	30.9	0.9
Population by Geography	2,135,644	6.6	30.7	29.3	33.4	0.0
Housing Units by Geography	796,385	6.3	30.3	30.0	33.4	0.0
Owner-Occupied Units by Geography	444,213	4.5	24.2	29.5	41.9	0.0
Occupied Rental Units by Geography	282,872	8.3	38.7	30.5	22.6	0.0
Vacant Units by Geography	69,300	9.6	35.8	31.8	22.7	0.0
Businesses by Geography	169,161	4.4	20.5	29.1	45.7	0.2
Farms by Geography	3,685	2.1	15.0	31.5	51.4	0.1
Family Distribution by Income Level	500,675	22.8	17.4	19.2	40.5	0.0
Household Distribution by Income Level	727,085	24.6	16.0	18.0	41.4	0.0
Median Family Income MSA - 41700 San Antonio-New Braunfels, TX MSA		\$62,228	Median Housing Value			\$149,780
			Median Gross Rent			\$897
			Families Below Poverty Level			12.9%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Texas

We performed a full-scope review of the San Antonio – New Braunfels AA which is weighted more than the limited-scope review of the Frio County AA. Our analysis of lending activity focused on commercial lending and residential real estate as they represent the primary lending products by dollar volume during the evaluation period. However, more weight will be given to the commercial lending as those credits represent 57 percent of the bank’s portfolio. Refer to appendix A for a list of all AAs under review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The bank’s performance under the lending test in Texas is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on full and limited-scope reviews, the bank’s lending performance in the state of Texas is reasonable.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table O in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of the bank's home mortgage loans is reasonable. The percentage of bank loans in low-income geographies was consistent with the percent of owner-occupied housing units and exceeded the aggregate lending in these areas. The percentage of bank loans in moderate-income geographies was below the percent of owner-occupied housing units but exceeded aggregate lending in these areas.

Commercial Loans

Refer to Table Q in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses was reasonable. The percentage of bank loans in low-income geographies is consistent with both the percentage of businesses and aggregate lending in these areas. The percentage of bank loans in moderate-income geographies is slightly below the percentage of businesses and aggregate lending in these geographies.

Lending Gap Analysis

During our analysis, we did not identify any unexplained or conspicuous gaps within the bank's lending.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table P in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of home mortgage loans to borrowers of different income levels is poor. The percentage of bank loans to both low- and moderate-income borrowers is below the percentage of low- and moderate-income families in the AA and aggregate lending. However, this poor performance can be an indication of a lack of affordable homes in the AA.

Commercial Loans

Refer to Table R in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The distribution of small loans to businesses is excellent. The percentage of bank loans to businesses with annual revenues of \$1 million or less is consistent with the reported percentage of small businesses in the AA and significantly exceeds aggregate lending data.

Responses to Complaints

There were no complaints related to FCB's CRA or fair lending performance during the evaluation period.

Conclusions for Area Receiving a Limited-Scope Review

During the evaluation period, the bank only originated two mortgages and 12 commercial credits in the Frio County AA. The lack of originations in the AA does not provide sufficient volume for proper analysis.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the community development test in the state of Texas is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on full-scope and limited-scope reviews, the bank exhibits adequate responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability in the bank's AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
San Antonio – New Braunfels	3	100	\$1,995	100

In the San Antonio – New Braunfels AA, FCB originated three loans totaling \$1.995 million supporting the community with affordable housing and community services for low- and moderate-income (LMI) individuals. The largest credit was to Capstone Property for \$1.875 million who provided LMI housing in a moderate-income census tract.

Broader Statewide

The bank provided a \$2 million loan for capital funding to a minority owned financial institution located in the Rio Grande Valley.

Number and Amount of Qualified Investments

During the current assessment period, the bank did not have any qualified investments. The bank did make \$16,000 in qualified donations to organizations who assist LMI individuals. Those organizations include: \$4,750 to Connections Individual and Family (homeless shelter); \$3,000 Communities in School (education advocacy); and \$2,000 to Hope Hospice.

Extent to Which the Bank Provides Community Development Services

In the San Antonio – New Braunfels AA 15 employees provided a total of 1,557 hours of service to 13 organizations that provide CD services in the AA. Those organizations include Central Texas Technology Center (provides higher education and technical skills training); Communities in Schools (education advocacy); Hope Hospice; Rotary Club of New Braunfels; and Seguin Habitat for Humanity. In addition to those volunteer hours, bank employees are also Board members, Chair-Woman/Man, and Treasurers of those organizations.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the CD test in the Frio County AA is weaker than the bank's overall performance under the CD test in the full-scope area. There were no CD loans, qualified investments, or services in the Frio County AA. However, this performance is an indication of minimal operations within this AA as previously mentioned throughout this PE.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	January 1, 2019 to December 31, 2021	
Bank Products Reviewed:	Home mortgage loans, small business loans, CD loans, qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State - TEXAS		
San Antonio-New Braunfels AA	Full-Scope	
Frio County AA	Limited-Scope	

Appendix B: Summary of State Ratings

RATINGS: First Commercial Bank Seguin			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First Commercial Bank Seguin	Satisfactory	Satisfactory	Satisfactory
State:			
Texas	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending (Aggt.): The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

Combined Statistical Area (CSA): A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

Community Development (CD): 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

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 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).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., 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 conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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 under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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 state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area: An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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.

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.

Rating Area: A rated area is a state or multi-state metropolitan statistical 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 multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical 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) 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.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (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.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income

geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
San Antonio – New Braunfels AA Full-Scope	197	58,712	99.0	121,441	4.5	4.0	1.5	24.2	14.7	12.1	29.5	39.6	31.1	41.9	41.6	55.3	0.0	0.0	0.0	
Frio County AA Limited-Scope	2	114	1.0	201	0.0	0.0	0.0	49.3	50.0	34.3	50.7	50.0	65.7	0.0	0.0	0.0	0.0	0.0	0.0	
Total	199	58,826	100.0	121,642	4.5	4.0	1.5	24.4	15.1	12.1	29.6	39.7	31.1	41.6	41.2	55.3	0.0	0.0	0.0	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2019-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
San Antonio – New Braunfels AA Full-Scope	197	58,712	99.0	121,441	22.8	1.0	2.6	17.4	5.1	11.9	19.2	8.6	18.7	40.5	53.8	35.1	0.0	32.0	31.6	
Frio County AA Limited-Scope	2	114	1.0	201	29.9	--	1.5	22.2	--	9.5	14.0	50.0	28.4	33.9	50.0	33.3	0.0	--	27.4	
Total	199	58,826	100.0	121,642	22.9	1.0	2.6	17.4	5.0	11.9	19.2	9.0	18.8	40.5	53.8	35.1	0.0	31.7	31.6	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-21	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
San Antonio – New Braunfels AA Full-Scope	42	10,405	78.0	48,046	4.4	4.8	4.4	20.5	16.7	20.5	29.1	38.1	28.1	45.7	40.5	46.8	0.2	0.0	0.2	
Frio County AA Limited-Scope	12	1,396	22.0	146	0.0	0.0	0.0	51.0	33.3	50.7	49.0	66.7	49.3	0.0	0.0	0.0	0.0	0.0	0.0	
Total	54	11,801	100.0	48,192	4.4	3.7	4.4	20.6	20.4	20.6	29.2	44.4	28.2	45.5	31.5	46.6	0.2	0.0	0.2	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019-21	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
San Antonio – New Braunfels AA Full-Scope	42	10,405	77.8	48,046	87.1	81.0	35.6	3.8	19.0	9.2	--		
Frio County AA Limited-Scope	12	1,396	22.2	146	77.2	100	28.8	3.6	0.0	19.2	--		
Total	54	11,801	100.0	48,192	87.0	85.2	35.6	3.8	14.8	9.2	--		

*Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*