PUBLIC DISCLOSURE

November 4, 2024

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Vantage Bank Texas
RSSD # 26765
45 NE Loop 410, Suite 500
San Antonio, TX 78216

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

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INSTITUTION RATING

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

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

Performance Levels	Vantage Bank Texas Performance Tests		
	Lending Test*	**Investment Test**	**Service Test**
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
Needs to Improve			
Substantial Non-Compliance			
* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.			

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors supporting the institution's rating include:

- Lending activity reflects adequate responsiveness to the credit needs of its delineated assessment areas (AAs).
- A high percentage of loans are made in the bank's AAs.
- The geographic distribution of loans reflects adequate penetration throughout the AAs.
- The distribution of loans among individuals of different income levels and businesses of different revenue sizes reflects adequate penetration throughout the AAs.
- Vantage has an adequate record of serving the credit needs of low-income individuals and areas, as well as very small businesses.
- The bank makes an adequate level of community development (CD) loans.
- Vantage has an adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors, although it is rarely in a leadership position.
- The bank makes rare use of innovative and/or complex investments to support CD initiatives.
- Vantage exhibits adequate responsiveness to credit and CD needs.
- Delivery systems are accessible to individuals of different income levels throughout the bank's AAs.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income (LMI) geographies and/or LMI individuals.
- Vantage's services do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- The bank provides an adequate level of CD services.

INSTITUTION

DESCRIPTION OF THE INSTITUTION

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

- Is a wholly owned subsidiary of VBT Financial Corporation, San Antonio, Texas.
- Reported total assets of approximately $4.4 billion and gross loans of $3.1 billion as of June 30, 2024.
- Operates 23 branch offices and 25 deposit-taking automated teller machines (ATMs) throughout its eight delineated AAs across the state of Texas as of June 30, 2024:
  - McAllen-Edinburg-Mission, Texas Metropolitan Statistical Area (MSA) AA (McAllen MSA AA);
  - San Antonio Metropolitan AA;
  - Fort Worth Metropolitan AA;
  - Houston Metropolitan AA;
  - Brownsville MSA AA;
  - El Paso Metropolitan AA;
  - Laredo MSA AA; and
  - Refugio Nonmetropolitan AA.
- Closed one branch location in the McAllen MSA AA and opened one branch in the Houston Metropolitan AA since the previous CRA performance evaluation dated August 1, 2022.
- Offers traditional deposit and loan products to meet the needs of the communities it serves.
  - Vantage is predominately a commercial lender, with commercial loans representing a significant majority of the bank's loan portfolio as of June 30, 2024. Commercial loans are made for a variety of business purposes, including financing for interim construction of industrial and commercial properties; financing for equipment, inventories, and accounts receivable; and acquisition financing.
  - Residential real estate loans comprise a smaller but significant portion of the total loan portfolio.
- Has the ability to meet various credit needs of the communities it serves, as it has not been hampered by its capacity to lend, financial condition and size, product offerings, prior performance, legal impediments, or other factors.

Table 1 reflects Vantage's loan portfolio mix as of June 30, 2024.

Table 1

Composition of Loan Portfolio as of June 30, 2024		
Loan Type	**$(000)**	**Percent (%)**
Agricultural	39,916	1.3
Commercial	2,616,342	83.2
Consumer	32,818	1.0
Residential Real Estate	420,056	13.4
Other	36,038	1.1
Gross Loans	**3,145,170**	**100.0**
Note: Percentages may not total 100.0 percent due to rounding.		

The Federal Reserve Bank of Dallas rated Vantage's CRA performance as **Satisfactory** at the previous performance evaluation dated August 1, 2022. Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Retail Institutions* to evaluate the bank's CRA performance. Vantage received a *Low Satisfactory* rating under the lending, investment, and service tests.

SCOPE OF THE EVALUATION

Vantage's CRA performance was evaluated using the FFIEC's *Interagency Examination Procedures for Large Retail Institutions*. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as the demographic and economic characteristics, and credit needs of the AAs.

Examiners conducted full-scope reviews for three of the bank's eight delineated AAs: McAllen MSA, San Antonio Metropolitan AA, and Fort Worth Metropolitan AA. Factors to determine which AAs would receive full-scope reviews include, but are not limited to, the level of the bank's lending, investment, and service activities as well as the availability of opportunities in AAs; population density; the number of other institutions in the AAs; and the length of time since the most recent full-scope review. The bank's performance in its McAllen MSA AA was given greater weight when determining the bank's overall performance, as Vantage extended the majority of its loans in this AA and operates ten of its 23 branches.

Table 2 depicts Vantage's delineated AAs and the scope of review each AA received.

Table 2

Level of Review of Delineated Assessment Areas	
Assessment Area	**Scope of Review Received**
McAllen MSA	Full-Scope
San Antonio Metropolitan	Full-Scope
Fort Worth Metropolitan	Full-Scope
Houston Metropolitan	Limited-Scope
Brownsville MSA	Limited-Scope
El Paso Metropolitan	Limited-Scope
Laredo MSA	Limited-Scope
Refugio Nonmetropolitan	Limited-Scope

This evaluation consists of a review of Vantage's 2022 and 2023 Home Mortgage Disclosure Act (HMDA) reported mortgage lending data, CRA-reported small business lending data, and the CD loans, investments, and services extended from August 1, 2022, through November 4, 2024, including prior period CD investments. Small business loans carried greater weight when assessing the bank's CRA performance given Vantage's strategic focus on commercial lending. Moreover, the volume of small business lending exceeded the volume of HMDA mortgage lending during the review period. Examiners noted the volume of small farm originations would not have provided a meaningful analysis; as such, small farm lending was not considered when evaluating the bank's CRA performance.

Evaluation Analysis

The evaluation of the bank's lending record in the individual AAs includes the use of and comparison to demographic characteristics. The primary sources for the demographic information are the 2020 U.S. Census and 2022 and 2023 Dun & Bradstreet (D&B) data. Demographic characteristics of a particular AA are useful in analyzing the bank's record of lending, as they provide a means of estimating loan demand and identifying lending opportunities. To understand small businesses credit needs and lending activity, examiners rely on D&B data, which consists of self-reported revenue data and geographical location. The demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers. The information is used to understand the bank's performance context. Emphasis was placed on the bank's performance in relation to aggregate lending data, as aggregate lending data is considered a better proxy of credit demand in a given geography.

In conjunction with the evaluation, examiners relied on information provided by six community leaders serving the bank's AAs receiving a full-scope review. Community contacts included representatives of community-based organizations, municipalities, and quasi-government agencies.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Vantage's overall lending test performance is **Low Satisfactory**. The bank's lending test performance is consistent in each of the bank's AAs receiving a full-scope review.

Lending activity reflects adequate responsiveness to the credit needs of Vantage's AAs. The distribution of loans reflects adequate geographic dispersion and distribution among borrowers of different income levels and businesses of different revenue sizes. Additionally, Vantage makes an adequate level of CD loans. Although examiners evaluated the bank's lending throughout its AAs, the evaluation focused on the lending in LMI geographies and to LMI borrowers. Vantage's lending distribution among middle- and upper-income geographies and to middle- and upper-income borrowers did not affect conclusions about the bank's overall CRA performance. Further, the bank's small business lending was given the greatest weight when assessing the overall CRA performance.

Lending Activity

Vantage's overall lending levels reflect adequate responsiveness to the credit needs of its AAs, taking into consideration performance context, such as the bank's resources and business strategy. As noted in Table 3, Vantage makes more small business loans than any other type of loans.

Table 3

Summary of Lending Activity January 1, 2022 through December 31, 2023				
Loan Type	#	%	$(000)	%
Home Purchase	529	38.8	246,101	46.3
Refinancing	50	3.7	24,562	4.6
Home Improvement	1	0.1	150	0.0
Multifamily	14	1.0	22,321	4.2
Other Purpose Closed/Exempt	27	2.0	9,059	1.7
Total HMDA-related	**621**	**45.6**	**302,193**	**56.9**
Total small business	**734**	**53.9**	**227,315**	**42.8**
Total small farm	**8**	**0.6**	**1,543**	**0.3**
TOTAL LOANS	**1,363**	**100.0**	**531,051**	**100.0**
Note: Percentages may not total 100.0 percent due to rounding.				

Assessment Area Concentration

This performance criterion evaluates the volume and percentage of HMDA- and CRA-reported small business loans extended inside and outside of the bank's delineated AAs. As depicted in Table 4, Vantage extends a high percentage of its loans, by number and dollar amount, within its eight AAs. While the bank extended a significant volume of small business loans within its AAs during the review period, 54.2 percent of home purchase loans were originated outside of the AAs. The majority of these mortgage loans were made in areas contiguous to the bank's AAs.

Table 4

Lending Inside and Outside of the Assessment Areas								
Loan Type	Inside Assessment Areas				Outside Assessment Areas			
	#	%	$(000)	%	#	%	$(000)	%
Home Purchase - Conventional	280	54.2	111,813	46.0	237	45.8	131,137	54.3
Home Purchase - FHA	11	91.7	3,033	96.3	1	8.3	118	3.7
Home Improvement	1	100.0	150	100.0	0	0.0	0	0.0
Refinancing	44	88.0	22,561	91.9	6	12.0	2,001	8.1
Multifamily	10	71.4	13,111	58.7	4	28.6	9,210	41.3
Other Purpose Closed/Exempt	17	63.0	3,252	35.9	10	37.0	5,807	64.1
Total HMDA-related	**363**	**58.5**	**153,920**	**50.9**	**258**	**41.5**	**148,273**	**49.1**
Small Business	**639**	**87.1**	**194,695**	**85.6**	**95**	**12.9**	**32,620**	**14.4**
Small Farm	**5**	**62.5**	**493**	**32.0**	**3**	**37.5**	**1,050**	**68.0**
TOTAL LOANS	**1,007**	**73.9**	**349,108**	**65.7**	**356**	**26.1**	**181,943**	**34.3**
Note: Percentages may not total 100.0 percent due to rounding.								

The remaining loan distribution analyses discussed in this performance evaluation will consider only those loans originated within the bank's AAs. A detailed discussion of the facts and data supporting the overall conclusions for the geographic and borrower distribution and CD lending are presented in the Conclusions with Respect to Performance Criteria section for each AA.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tract. The overall geographic distribution of lending reflects adequate penetration throughout the bank's AAs. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each AA.

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

This performance criterion evaluates the bank's lending to borrowers of different income levels and businesses of different revenue sizes. Vantage's overall lending reflects adequate penetration among individuals of different income levels and businesses of different revenue sizes. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each AA.

Community Development Lending

This performance criterion evaluates the bank's level of CD lending and responsiveness to the credit needs of low-income individuals and geographies as well as very small businesses.

Vantage makes an adequate level of CD loans and exhibits an adequate record of serving the credit needs of low-income individuals and areas and very small businesses. As noted in Table 5, Vantage extended CD loans for a variety of purposes, with the majority focused on economic development through financing small businesses. The number of CD loans extended by the bank since the previous evaluation decreased due to the sunset of the Small Business Administration's (SBA's) Payroll Protection Program (PPP) on May 31, 2021. However, the CD loans extended during the review period were responsive to credit needs of the AAs, as the majority of Vantage's CD loans were to local small businesses to allow them to create new or retain existing jobs for LMI residents. This strategic focus on economic development through financing small businesses aligns with Vantage's expertise as a commercial bank.

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

Table 5

Community Development Lending Assessment Area: All		
Purpose	**#**	**$(000)**
Affordable Housing	0	0
Community Services	1	1,200
Economic Development	8	26,997
Revitalization and Stabilization	2	14,670
Total	**11**	**42,867**

INVESTMENT TEST

Vantage's overall investment test rating is **Low Satisfactory**. The bank's performance in the McAllen MSA and Fort Worth Metropolitan AAs is consistent with the overall rating, while the bank's performance is better in the San Antonio Metropolitan AA.

This performance criterion evaluates the bank's level of qualifying investments, grants, donations, or in-kind contributions of property with a primary purpose of CD made since the most recent evaluation or earlier if the investment remains on the bank's books. Vantage has an adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors. The volume and amount of such investments and grants rarely positions the bank as a leader. While Vantage makes rare use of innovative and/or complex investments, it exhibits adequate responsiveness to the credit and CD needs of its AAs as a substantial volume of the investments and donations focuses on community services. Specific details regarding investments, grants, and donations can be found in the Conclusions with Respect to Performance Tests section for each AA.

Table 6 illustrates the bank's overall level of CD investments.

Table 6

Investments, Grants, and Donations Assessment Area: All							
Community Development Purpose	**Prior Period Investments[1]**		**Current Investments[2]**		**Donations**		**Total**	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	3	4,265	3	2,450	1	1	7	6,716
Community Services	0	0	0	0	46	111	46	111
Economic Development	0	0	0	0	19	70	19	70
Revitalization and Stabilization	4	4,779	1	2,431	0	0	5	7,210
Total	**7**	**9,044**	**4**	**4,881**	**66**	**182**	**77**	**14,107**

[1]   Book Value of Investment
[2]   Original Market Value of Investment

SERVICE TEST

Vantage's overall service test rating is **Low Satisfactory**. The bank's service test performance in the McAllen MSA AA is greater than the overall rating, while the performance in the San Antonio Metropolitan and Fort Worth Metropolitan AAs is consistent with the overall performance.

Retail Services

This performance criterion evaluates the bank's level of delivery systems provided in each geography classification. As noted in Table 7, Vantage's delivery systems are accessible to the geographies and individuals of different income levels in the delineated AAs. The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including in LMI geographies and to LMI individuals. Banking services and hours of operations do not vary in a way that inconveniences the AAs, particularly LMI geographies and/or individuals.

Table 7

Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	11.8	9.9	8.1	3	13.0	3	12.0
Moderate	29.7	28.0	23.9	2	8.7	3	12.0
Middle	28.5	30.4	27.2	7	30.4	8	32.0
Upper	27.5	30.4	39.5	10	43.5	10	40.0
Unknown	2.5	1.2	1.4	1	4.3	1	4.0
Total	**100.0**	**100.0**	**100.0**	**23**	**100.0**	**25**	**100.0**

Branch and Full-Service ATM Locations — Assessment Area: All

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

Community Development Services

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

Overall, Vantage provides an adequate level of CD services. As illustrated in Table 8, bank representatives provided 80 services, totaling 1,623 hours, to 42 organizations, including local grassroots organizations as well as large, well-known organizations that provide varying levels of community services to LMI individuals and families in the bank's AAs. A significant portion of the CD services had a primary purpose of providing community services targeted to LMI individuals. Vantage's employees served in various roles, including serving on the boards of directors of nonprofit organizations, providing financial expertise to LMI individuals and students. The total number of CD services provided by the bank significantly increased by 77.5 percent compared to the previous evaluation, as in-person interactions with communities within the bank's AAs have ramped up since the end of the COVID-19 pandemic. The bank's increased CD service activity reflects favorably on its responsiveness of meeting the needs of its AAs.

Table 8

Purpose	Total Services	Total Hours	Total Organizations
Affordable Housing	0	0	0
Community Services	67	1,215	36
Economic Development	13	408	6
Revitalization and Stabilization	0	0	0
Total	**80**	**1,623**	**42**

Community Development Services — Assessment Area: All

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

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

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE MCALLEN METROPOLITAN STATISTICAL AREA ASSESSMENT AREA

- The McAllen MSA AA encompasses the entirety of the McAllen-Edinburg-Mission, Texas MSA, which consists of Hidalgo County. Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- The AA delineation remains unchanged from the previous evaluation.
- According to the 2020 American Community Survey (ACS), the AA includes a total of 212 census tracts: 13 low-, 47 moderate-, 80 middle, and 63 upper-income geographies, as well as nine census tracts within unknown income levels.
- As of June 30, 2024, 43.5 percent of Vantage's branches are in the McAllen MSA AA. Of the ten branches operated in the AA, one is in a low-, one in a moderate-, three in middle-, four in upper-, and one in an unknown-income census tract.
- According to the June 30, 2024, Federal Deposit Insurance Corporation's (FDIC's) Deposit Market Share Report, the bank holds 11.2 percent of the AA's deposit market share, ranking 3rd among 20 FDIC-insured depository institutions operating in the AA.
- In 2023, 314 institutions originated or purchased 9,195 HMDA-reportable loans in the AA. Of those, Vantage ranked 43rd, originating 36 or 0.4 percent of total loans. Additionally, in 2023, the bank ranked 23rd among 113 institutions originating or purchasing CRA-reportable loans. Vantage originated 125 of the 16,499 or 0.8 percent of CRA-reportable loans in the AA.
- Examiners conducted interviews with two representatives of community organizations that promote economic development and provide affordable housing for LMI individuals and families in the AA. Community contacts identified affordable housing and access to credit for small businesses as needs within the AA.

Table 9

Population Change Assessment Area: McAllen MSA			
Area	2015 Population	2020 Population	Percent Change
McAllen MSA	819,217	870,781	6.3
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 highlighted in Table 9, the AA population experienced growth of more than 50,000 people between 2015 and 2020, representing a 6.3 percent increase. However, this growth rate is lower than the statewide population growth rate.
- McAllen, the largest city in the AA, is the 23rd most populous city in the state of Texas, according to the ACS.
- The AA is located in the Rio Grande Valley at the southern portion of Texas. People are drawn to McAllen because it is located on the Mexico-United States border.

Table 10

Median Family Income Change Assessment Area: McAllen MSA			
Area	**2015 Median Family Income ($)**	**2020 Median Family Income ($)**	**Percent Change**
McAllen MSA	41,003	46,609	13.7
Texas	68,523	76,073	11.0
Source: 2011 - 2015 U.S. Census Bureau American Community Survey 2016 - 2020 U.S. Census Bureau American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.			

- As noted in Table 10, the median family income (MFI) in the AA between 2015 and 2020 grew at a rate slightly above the statewide MFI. However, the MFI for the AA is significantly lower than the statewide.
- A community contact stated that the AA has a high poverty rate of poverty, primarily due to the high concentration of new immigrants.
- According to the 2023 FFIEC census data, 26.8 percent of AA households live below the poverty level, which is significantly higher than the statewide figure of 13.4 percent. This indicates that households within the AA generally have less income than families who reside in other regions of the state. Furthermore, households below the poverty line are less likely to be able to qualify for a mortgage.

Table 11

Housing Cost Burden Assessment Area: McAllen MSA						
Area	**Cost Burden - Renters**			**Cost Burden - Owners**		
	Low- Income	**Moderate- Income**	**All Renters**	**Low- Income**	**Moderate- Income**	**All Owners**
McAllen MSA	71.6	31.2	43.5	52.6	23.1	21.7
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						

- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on homeowners at any other level. The majority of low-income homeowners spend more than 30.0 percent of household income on housing, and among low-income renters, more than two-thirds of low-income households experience this burden, significantly limiting resources available for non-housing related needs.
- As demonstrated in Table 11, the housing cost burden for LMI individuals and families is less than the statewide average for both renters and homeowners. Thus, housing is more affordable within the AA than statewide.
- A community contact noted that while homeownership is generally more affordable within the AA than in other regions of Texas, LMI families face various barriers, such as interest rates, poor credit history, and restrictive underwriting requirements, which prevent them from attaining home mortgage loans.

Table 12

Unemployment Rates Assessment Area: McAllen MSA					
Area	**2019**	**2020**	**2021**	**2022**	**2023**
McAllen MSA	6.3	11.7	9.1	6.5	6.5
Texas	3.5	7.7	5.6	3.9	4.2
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- Unemployment rates for the MSA were consistently higher than the statewide unemployment rates between 2019 and 2023.
- The AA unemployment rates peaked in 2020 as a result of the COVID-19 pandemic; however, they reached pre-pandemic levels in 2022.
- A community contact identified workforce development as a need to help support sustainable employment opportunities within the AA.
- Major industries that provide employment opportunities in the AA are healthcare and social services, accommodation and food services, and retail trade.

Table 13 below details selected characteristics of the AA.

Table 13

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

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Vantage's lending test performance in the McAllen MSA AA is adequate. For this evaluation, the bank's small business lending carried more weight when determining the overall lending performance in the AA, as it comprised the largest volume of lending in the area and aligns with Vantage's strategic focus on commercial lending.

Lending Activity

The bank's lending activity reflects adequate responsiveness to the AA credit needs although limited use of innovative and/or flexible lending practices was noted. While Vantage ranked 3rd among the 20 financial institutions reporting CRA small business lending in the AA in 2023, the bank's market share reflects only 11.2 percent, which highlights the high level of competition for small business loans in the AA. As noted on Table 14, 74.0 percent of the loans extended within the AA during the review period are small business loans.

Table 14

Summary of Lending Activity January 1, 2022 through December 31, 2022 Assessment Area: McAllen MSA				
Loan Type	**#**	**%**	**$(000)**	**%**
Home Purchase	60	17.1	16,177	14.8
Refinancing	14	4.0	3,811	3.5
Home Improvement	0	0.0	0	0.0
Multifamily	4	1.1	10,271	9.4
Other Purpose Closed/Exempt	12	3.4	1,859	1.7
Total HMDA	**90**	**25.7**	**32,118**	**29.5**
Total Small Business	**259**	**74.0**	**76,832**	**70.5**
Total Small Farm	**1**	**0.3**	**105**	**0.1**
TOTAL LOANS	**350**	**100.0**	**109,055**	**100.0**
Note: Percentages may not total 100.0 percent due to rounding.				

Geographic Distribution of Loans

Vantage's geographic distribution of loans reflects adequate penetration throughout the AA. The bank's small business and home mortgage lending reflects adequate penetration among geographies of different income levels, especially LMI geographies. Loans were generally made in proximity to the bank's branches, and no conspicuous gaps or anomalies in lending patterns were noted. Greater weight was allocated to small business lending based on the bank's strategic focus on commercial lending and lower level of HMDA lending. Moreover, a separate evaluation for refinance, home improvement, multifamily, and purpose not applicable loans would not have produced a meaningful analysis.

The bank's lending in middle- and upper-income geographies did not affect conclusions about its performance considering the lending in LMI geographies.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA loans reflects adequate penetration throughout the AA when compared to the percent of owner-occupied housing units located in LMI census tracts (the demographic figure) and to aggregate lending data in the AA.

In 2022, Vantage exceeded the level of aggregate lending in low-income census tracts but fell below the percentage of AA owner-occupied units. In 2023, Vantage's home mortgage lending in low-income geographies decreased, as the bank did not originate any loans. It is notable that aggregate lending among low-income census tracts for both years fell below the demographic figure. Moreover, only 5.1 percent of the housing units located in low-income census tracts are owner-occupied, which impacts loan demand and point to a high level of competition among area banks for limited number of loans.

In 2022 and 2023, the bank's total home mortgage lending among moderate-income census tracts was slightly below aggregate lending data and significantly lower than the demographic figure. Vantage's home mortgage lending decreased during the review period, falling from 54 total loans in 2022 to 36 total loans in 2023. Similarly, total HMDA lending in the AA decreased during the review period, falling from 11,369 originations in 2022 to 9,195 in 2023. This decrease is primarily attributed to the raising interest rate environment, which made mortgage loans progressively more expensive and resulted in decreased demand and increased competition among lenders for the shrinking volume of lending opportunities in LMI tracts. Despite competition among lenders and limited lending opportunities, the bank's lending performance in LMI geographies is adequate.

Tables 15A and 15B provide details about the bank's 2022 and 2023 home mortgage lending by income level of geography within the AA.

Home Purchase Lending

The geographic distribution of home purchase lending is adequate. The distribution of home purchase loans among low-income census tracts in 2022 exceeded the aggregate lending data and aligned with the demographic figure. The bank's 2022 home purchase lending among moderate-income census tracts fell below aggregate data. Vantage and aggregate lenders' performance were significantly below the demographic figure.

In 2023, the bank did not originate any home purchase loans in low-income census tracts, while aggregate lenders originated 1.6 percent of total home purchase loans, which is below the demographic figure of 5.1 percent. In moderate-income census tracts, the bank's home purchase lending was in alignment with aggregate data. The percentage of owner-occupied housing units in moderate-income census tracts was significantly higher than the bank's performance and aggregate lending in these census tracts. Given the high level of competition among financial institutions and Vantage's strategic focus on small business lending rather than HMDA lending, the bank's geographic distribution of home purchase lending is adequate.

Table 15A

Distribution of 2022 and 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: McAllen MSA												
Geographic Income Level	**Bank And Aggregate Loans By Year**											**Owner Occupied Units %**
	2022						**2023**					
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans												
Low	2	5.6	1.3	324	3.4	1.0	0	0.0	1.6	0	0.0	1.3	5.1
Moderate	2	5.6	9.3	1,041	11.0	8.0	3	12.5	12.3	970	14.4	11.0	19.0
Middle	13	36.1	40.6	2,576	27.3	37.7	5	20.8	39.8	651	9.7	35.8	40.6
Upper	16	44.4	44.6	4,915	52.1	48.3	14	58.3	43.1	4,753	70.5	48.2	33.0
Unknown	3	8.3	4.2	578	6.1	5.1	2	8.3	3.1	369	5.5	3.7	2.2
Total	36	100.0	100.0	9,434	100.0	100.0	24	100.0	100.0	6,743	100.0	100.0	100.0
Refinance Loans												
Low	0	0.0	1.5	0	0.0	1.3	0	0.0	2.2	0	0.0	1.8	5.1
Moderate	1	11.1	10.3	100	7.6	9.5	0	0.0	13.0	0	0.0	11.9	19.0
Middle	2	22.2	36.7	159	12.0	34.5	2	40.0	38.2	194	7.8	36.0	40.6
Upper	6	66.7	48.6	1,061	80.4	51.8	3	60.0	43.7	2,297	92.2	47.0	33.0
Unknown	0	0.0	2.9	0	0.0	2.8	0	0.0	2.9	0	0.0	3.3	2.2
Total	9	100.0	100.0	1,320	100.0	100.0	5	100.0	100.0	2,491	100.0	100.0	100.0
Home Improvement Loans												
Low	0	0.0	0.8	0	0.0	0.4	0	0.0	5.1	0	0.0	4.0	5.1
Moderate	0	0.0	11.7	0	0.0	12.6	0	0.0	11.9	0	0.0	12.2	19.0
Middle	0	0.0	39.8	0	0.0	40.8	0	0.0	28.4	0	0.0	31.0	40.6
Upper	0	0.0	43.0	0	0.0	42.1	0	0.0	51.1	0	0.0	50.2	33.0
Unknown	0	0.0	4.7	0	0.0	4.0	0	0.0	3.4	0	0.0	2.5	2.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans												**Multi-family Units %**
Low	0	0.0	4.2	0	0.0	3.4	0	0.0	6.6	0	0.0	4.7	5.6
Moderate	1	33.3	16.8	160	4.5	20.8	0	0.0	17.6	0	0.0	17.9	23.4
Middle	0	0.0	40.0	0	0.0	35.4	0	0.0	24.2	0	0.0	23.9	31.3
Upper	2	66.7	37.9	3,400	95.5	39.5	1	100.0	51.6	6,711	100.0	53.5	36.1
Unknown	0	0.0	1.1	0	0.0	0.8	0	0.0	0.0	0	0.0	0.0	3.5
Total	3	100.0	100.0	3,560	100.0	100.0	1	100.0	100.0	6,711	100.0	100.0	100.0
Total Home Mortgage Loans												**Owner Occupied Units %**
Low	2	3.7	1.4	324	2.2	1.2	0	0.0	1.8	0	0.0	1.7	5.1
Moderate	5	9.3	9.8	1,411	9.5	9.4	4	11.1	12.4	1,245	7.2	11.8	19.0
Middle	18	33.3	39.4	3,015	20.3	36.7	11	30.6	38.7	1,380	8.0	34.6	40.6
Upper	26	48.1	45.6	9,551	64.2	48.5	19	52.8	44.0	14,245	82.6	48.6	33.0
Unknown	3	5.6	3.8	578	3.9	4.3	2	5.6	3.0	369	2.1	3.3	2.2
Total	54	100.0	100.0	14,879	100.0	100.0	36	100.0	100.0	17,239	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 15B

Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %
	2022						2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Distribution of 2022 and 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: McAllen MSA													
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.8	0	0.0	0.7	5.1
Moderate	0	0.0	16.7	0	0.0	14.7	0	0.0	8.8	0	0.0	8.3	19.0
Middle	0	0.0	29.2	0	0.0	24.7	0	0.0	26.4	0	0.0	23.3	40.6
Upper	0	0.0	51.4	0	0.0	53.2	0	0.0	63.2	0	0.0	67.6	33.0
Unknown	0	0.0	2.8	0	0.0	7.3	0	0.0	0.8	0	0.0	0.2	2.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.0	0	0.0	2.2	0	0.0	1.0	0	0.0	0.9	5.1
Moderate	1	16.7	15.0	110	19.5	11.6	1	16.7	13.5	275	21.3	13.6	19.0
Middle	3	50.0	36.5	280	49.6	28.8	4	66.7	32.7	535	41.3	28.2	40.6
Upper	2	33.3	42.1	175	31.0	53.9	1	16.7	50.2	484	37.4	53.6	33.0
Unknown	0	0.0	3.4	0	0.0	3.5	0	0.0	2.7	0	0.0	3.6	2.2
Total	6	100.0	100.0	565	100.0	100.0	6	100.0	100.0	1,294	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.2	0	0.0	1.1	0	0.0	3.2	0	0.0	2.4	5.1
Moderate	0	0.0	7.5	0	0.0	5.9	0	0.0	5.3	0	0.0	3.6	19.0
Middle	0	0.0	38.2	0	0.0	36.9	0	0.0	36.8	0	0.0	37.7	40.6
Upper	0	0.0	48.4	0	0.0	53.1	0	0.0	51.6	0	0.0	53.5	33.0
Unknown	0	0.0	3.8	0	0.0	3.1	0	0.0	3.2	0	0.0	2.8	2.2
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

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

Vantage's geographic distribution of small business loans reflects adequate penetration throughout the AA. As noted in Table 16, the bank's small business lending among low-income census tracts in 2022 aligned with aggregate data and the percentage of businesses located in the AA. However, Vantage's small business lending to low-income census tracts fell slightly below aggregate lenders' performance and the demographic figure in 2023.

Among moderate-income census tracts in 2022 and 2023, Vantage's small business lending performance fell below aggregate data and the percentage of businesses located in such tracts.

Table 16

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	5	3.7	3.0	1,277	3.5	2.3	2	1.6	2.9	818	2.0	2.8	3.2
Moderate	14	10.4	15.5	4,096	11.2	15.6	16	12.8	15.2	4,952	12.3	15.5	15.9
Middle	57	42.5	36.5	18,921	51.6	37.1	54	43.2	36.1	20,493	51.1	38.2	38.0
Upper	51	38.1	40.9	11,296	30.8	40.6	46	36.8	41.4	12,128	30.2	39.3	39.6
Unknown	7	5.2	3.5	1,107	3.0	4.1	7	5.6	3.7	1,744	4.3	4.0	3.4
Total	134	100.0	100.0	36,697	100.0	100.0	125	100.0	100.0	40,135	100.0	100.0	100.0

Distribution of 2022 and 2023 Small Business Lending by Income Level of Geography Assessment Area: McAllen MSA

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 Businesses of Different Revenue Sizes

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

Residential Real Estate (HMDA) Lending

Home mortgage lending by borrower income in the AA is adequate when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the AA. As shown in Tables 17A and 17B, the bank did not originate any home mortgage loans to low-income borrowers in 2022 and 2023, falling below aggregate data and substantially below the percentage of families classified as low-income. However, aggregate lenders also performed significantly below the demographic figure.

In 2022, the bank's distribution of home mortgage loans among moderate-income borrowers slightly exceeded the aggregate data but fell significantly below the percentage of families classified as moderate-income. In 2023, however, Vantage did not originate any home purchase loans among moderate-income borrowers. Aggregate lenders also performed significantly below the demographic figure. Community contacts noted affordability of home loans in the AA as a challenge, which contributes to the lack of loan demand among LMI borrowers. Given this performance context, the bank's home mortgage lending by borrower income is adequate.

Table 17A

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.6	0	0.0	0.3	0	0.0	0.3	0	0.0	0.1	26.1
Moderate	2	5.6	4.5	226	2.4	2.4	0	0.0	3.7	0	0.0	1.9	15.2
Middle	1	2.8	15.4	161	1.7	11.3	3	12.5	14.2	386	5.7	10.3	16.2
Upper	29	80.6	52.5	7,992	84.7	58.1	19	79.2	51.7	5,797	86.0	58.9	42.5
Unknown	4	11.1	27.0	1,055	11.2	27.9	2	8.3	30.0	560	8.3	28.8	0.0
Total	36	100.0	100.0	9,434	100.0	100.0	24	100.0	100.0	6,743	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.0	0	0.0	0.3	0	0.0	1.1	0	0.0	0.4	26.1
Moderate	1	11.1	6.5	100	7.6	3.6	0	0.0	5.0	0	0.0	2.2	15.2
Middle	0	0.0	15.3	0	0.0	10.8	0	0.0	10.9	0	0.0	6.8	16.2
Upper	6	66.7	56.0	798	60.5	60.8	5	100.0	59.8	2,491	100.0	63.4	42.5
Unknown	2	22.2	21.1	422	32.0	24.5	0	0.0	23.2	0	0.0	27.2	0.0
Total	9	100.0	100.0	1,320	100.0	100.0	5	100.0	100.0	2,491	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	5.5	0	0.0	3.1	0	0.0	6.8	0	0.0	3.4	26.1
Moderate	0	0.0	8.6	0	0.0	7.3	0	0.0	13.6	0	0.0	8.8	15.2
Middle	0	0.0	21.9	0	0.0	19.8	0	0.0	14.8	0	0.0	12.9	16.2
Upper	0	0.0	60.9	0	0.0	65.3	0	0.0	60.2	0	0.0	66.3	42.5
Unknown	0	0.0	3.1	0	0.0	4.5	0	0.0	4.5	0	0.0	8.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	0.8	0	0.0	0.4	0	0.0	0.6	0	0.0	0.2	26.1
Moderate	4	7.8	5.2	436	3.9	2.8	1	2.9	4.5	80	0.8	2.2	15.2
Middle	2	3.9	15.2	216	1.9	11.2	4	11.4	13.7	603	5.7	9.7	16.2
Upper	39	76.5	53.0	9,190	81.2	58.5	28	80.0	53.4	9,285	88.2	59.9	42.5
Unknown	6	11.8	25.7	1,477	13.0	27.2	2	5.7	27.7	560	5.3	28.0	0.0
Total	51	100.0	100.0	11,319	100.0	100.0	35	100.0	100.0	10,528	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 17B

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	4.2	0	0.0	6.3	0	0.0	0.8	0	0.0	1.0	26.1
Moderate	0	0.0	11.1	0	0.0	9.3	0	0.0	9.6	0	0.0	8.4	15.2
Middle	0	0.0	13.9	0	0.0	14.7	0	0.0	14.4	0	0.0	9.8	16.2
Upper	0	0.0	70.8	0	0.0	69.7	0	0.0	73.6	0	0.0	79.5	42.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.6	0	0.0	1.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	3.4	0	0.0	1.4	0	0.0	2.4	0	0.0	0.8	26.1
Moderate	1	16.7	10.5	110	19.5	6.1	1	16.7	12.1	80	6.2	9.0	15.2
Middle	1	16.7	17.3	55	9.7	12.4	1	16.7	19.9	217	16.8	14.6	16.2
Upper	4	66.7	63.2	400	70.8	71.3	4	66.7	63.0	997	77.0	70.5	42.5
Unknown	0	0.0	5.6	0	0.0	8.8	0	0.0	2.7	0	0.0	5.1	0.0
Total	6	100.0	100.0	565	100.0	100.0	6	100.0	100.0	1,294	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.5	0	0.0	0.3	0	0.0	0.0	0	0.0	0.0	26.1
Moderate	0	0.0	3.2	0	0.0	1.7	0	0.0	4.2	0	0.0	2.9	15.2
Middle	0	0.0	0.5	0	0.0	0.4	0	0.0	3.2	0	0.0	3.8	16.2
Upper	0	0.0	1.1	0	0.0	3.4	0	0.0	1.1	0	0.0	3.3	42.5
Unknown	0	0.0	94.6	0	0.0	94.2	0	0.0	91.6	0	0.0	90.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 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

Vantage's borrower distribution of small business loans by revenue size of businesses is adequate. As reflected in Table 18, the bank's distribution of 2022 and 2023 small business loans to businesses with revenues of $ 1 million or less was below aggregate and the total percentage of small businesses in the AA. While Vantage's distribution of loans to small businesses declined since the previous evaluation, the decrease is attributed to the cessation of the SBA's PPP. At the previous evaluation, a substantial volume of Vantage's small business loans were SBA PPP loans.

Additionally, a large volume of small business loans extended by Vantage in 2022 and 2023 were to businesses with unknown revenues. Vantage extended 64 (47.8 percent) and 58 (46.4 percent) small businesses loans to businesses with unknown revenues in 2022 and 2023, respectively. These loans are primarily attributed to a flexible loan product secured by certificates of deposit the bank offers. Vantage's participation in this flexible product reflects favorably on its responsiveness to the credit needs of businesses in the AA.

Table 18

	Bank And Aggregate Loans By Year												Total Businesses %
	2022						**2023**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	41	30.6	45.6	10,288	28.0	32.6	42	33.6	48.6	15,424	38.4	32.8	93.7
Over $1 Million	29	21.6		12,273	33.4		25	20.0		11,484	28.6		5.6
Revenue Unknown	64	47.8		14,136	38.5		58	46.4		13,227	33.0		0.7
Total	134	100.0		36,697	100.0		125	100.0		40,135	100.0		100.0
By Loan Size													
$100,000 or Less	41	30.6	93.2	2,464	6.7	39.0	38	30.4	92.9	2,455	6.1	37.7	
$100,001 - $250,000	34	25.4	3.9	6,062	16.5	18.3	32	25.6	4.1	5,859	14.6	18.6	
$250,001 - $1 Million	59	44.0	2.9	28,171	76.8	42.8	55	44.0	3.0	31,821	79.3	43.8	
Total	134	100.0	100.0	36,697	100.0	100.0	125	100.0	100.0	40,135	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	7	17.1		569	5.5		6	14.3		419	2.7		
$100,001 - $250,000	16	39.0		2,870	27.9		12	28.6		2,128	13.8		
$250,001 - $1 Million	18	43.9		6,849	66.6		24	57.1		12,877	83.5		
Total	41	100.0		10,288	100.0		42	100.0		15,424	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 Lending

The bank makes an adequate level of CD loans in the AA, with the majority of these loans extended for the purpose of economic development. The bank's CD lending since the previous evaluation decreased significantly by dollar amount and number volume given the cessation of the SBA's PPP in May 2021. As reflected in Table 19, Vantage originated a total of five qualifying CD loans in the AA, totaling $12.4 million. A significant portion of CD loans extended during the review were for economic development. Specifically, loans were extended to businesses, which would assist them to attract or retain employment opportunities for LMI individuals. Given that community contacts noted a need for employment opportunities within the AA, Vantage's CD lending performance in the AA is adequate.

Examples of the bank's CD lending activities that were considered particularly responsive to the AA credit needs include:

- A $5 million dollar loan to finance the construction of a food-processing plant that will aid in retaining full-time employment opportunities for LMI individuals.
- A $1.2 million dollar loan to finance the construction of a federally-qualified health center that will serve LMI individuals and families.

Table 19

Community Development Lending Assessment Area: McAllen MSA		
Purpose	**#**	**$(000)**
Affordable Housing	0	0
Community Services	1	1,200
Economic Development	3	9,942
Revitalization and Stabilization	1	1,267
Totals	**5**	**12,409**

INVESTMENT TEST

Vantage's performance under the investment test adequate. While the bank is rarely in a leadership position, Vantage has an adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors. The bank makes rare use of innovative or complex investments to support CD initiatives and exhibits adequate responsiveness to AA credit needs. During the review period, Vantage's investments primarily focused on community services targeted at LMI individuals and economic development, which reflects favorably on the bank's responsiveness, as community contacts emphasized these as CD needs in the AA.

Table 20 illustrates the bank's CD investments and donations within the AA, including prior period investments that remain on the bank's books, investments purchased during the review period, and CD donations made since the previous evaluation. Examples of notable investments and donations that reflect Vantage's efforts to meet the CD and credit needs of the AA include:

- $30,000 in donations to 15 different organizations that serve LMI individuals.
- A $350,000 municipal bond to finance renovations of schools in a district where 65.8 percent of students are economically disadvantaged.

Table 20

Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	**$(000)**	**#**	**$(000)**	**#**	**$(000)**	**#**	**$(000)**
Affordable Housing	0	0	0	0	0	0	0	0
Community Services	0	0	0	0	15	31	15	31
Economic Development	0	0	0	0	4	6	4	6
Revitalization and Stabilization	1	346	0	0	0	0	1	346
Total	**1**	**346**	**0**	**0**	**19**	**37**	**20**	**383**

[1] Book Value of Investment
[2] Original Market Value of Investment

SERVICE TEST

The bank's service test performance is good. The conclusion is supported by the type and level of retail and CD services, including accessibility of branches in comparison with the population within LMI geographies, availability of alternative delivery systems, changes in branch locations, and reasonableness of services.

Retail Services

Vantage's delivery systems are accessible to geographies and individuals of different income levels in its AA. The distribution of the bank's ten branches and 11 ATMs as of June 30, 2024, was compared to the distribution of the population and businesses among the tract categories within the AA. The branches located in the AA are accessible to LMI geographies. Table 21 summarizes the bank's retail locations in the AA.

Table 21

Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	6.1	5.3	3.2	1	10.0	1	9.1
Moderate	22.2	20.2	15.9	1	10.0	1	9.1
Middle	37.7	39.8	38.0	3	30.0	4	36.4
Upper	29.7	32.3	39.6	4	40.0	4	36.4
Unknown	4.2	2.4	3.4	1	10.0	1	9.1
Total	**100.0**	**100.0**	**100.0**	**10**	**100.0**	**11**	**100.0**

Branch and Full-Service ATM Locations — Assessment Area: McAllen MSA

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

The bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or individuals, despite the closure of a branch in a middle-income census tract since the previous evaluation. Twenty percent of the bank's branches are located in LMI census tracts. Moreover, the remaining branches are adjacent to LMI geographies. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly LMI geographies and/or individuals.

Community Development Services

Vantage provides an adequate level of CD services in the AA. As noted in Table 22, Vantage employees extended 19 services among 12 organizations for a total of 726 hours. The volume of community services and total hours has significantly increased since the previous evaluation, as in-person interactions within the AA ramped up since the end of the COVID-19 pandemic. The bank's increased CD service activity reflects favorably on its responsiveness of meeting the AA needs. Examples of CD services performed by Vantage employees include:

- An employee serving on the board of directors for an organization that provides affordable housing and delivers social services to homeless individuals in the AA.
- Bank employees partnered with a local school district to provide financial education and resources to LMI students.

Table 22

Community Development Services Assessment Area: McAllen MSA			
Purpose	**Total Services**	**Total Hours**	**Total Organizations**
Affordable Housing	0	0	0
Community Services	16	606	10
Economic Development	3	120	2
Revitalization and Stabilization	0	0	0
Total	**19**	**726**	**12**

SAN ANTONIO METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE SAN ANTONIO METROPOLITAN ASSESSMENT AREA

- The San Antonio Metropolitan AA consists of the Bexar and Medina counties, which are part of the San Antonio-New Braunfels, TX MSA. The AA excludes the remainder counties of the MSA: Atascosa, Bandera, Comal, Guadalupe, Kendall, and Wilson. Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- The delineation of the AA remains unchanged from the previous evaluation.
- According to the 2020 ACS data, the AA includes a total of 386 census tracts: 35 low-, 139 moderate-, 108 middle-, and 100 upper-income geographies. In addition, the AA has four census tracts with unknown income levels.
- As of June 30, 2024, Vantage operates three branches in the AA, representing 13.0 percent of its branches. One branch is located in a low-income census tract, one in a middle-, and one in an upper-income census tract.
- According to the June 30, 2024, FDIC Deposit Market Share Report, the bank holds 0.4 percent of the deposit market share, ranking 14th among 54 FDIC-insured depository institutions operating in the AA.
- In 2023, 664 institutions originated or purchased 48,474 HMDA-reportable loans in the AA. Of those, the bank ranked 108th, originating 39 or 0.1 percent of the reported loans. Additionally, Vantage originated 78 of the 42,536 (0.2 percent) of the CRA loans reported in the AA in 2023, ranking 35th among 176 CRA-reporters.
- Examiners interviewed a representative of an affordable housing agency, who identified a need for affordable housing, particularly assistance with home renovations and flexible mortgage products for LMI individuals and families. Additionally, a representative of a local small business development organization stated that technical assistance and loans with flexible underwriting criteria are needs for small businesses in the AA.

Table 23

Population Change Assessment Area: San Antonio Metropolitan			
Area	**2015 Population**	**2020 Population**	**Percent Change**
San Antonio Metropolitan	1,872,894	2,060,072	10.0
Bexar County, TX	1,825,502	2,009,324	10.1
Medina County, TX	47,392	50,748	7.1
San Antonio-New Braunfels, TX MSA	2,286,702	2,558,143	11.9
Texas	26,538,614	29,145,505	9.8
Source: 2011-2015 U.S. Census Bureau Decennial Census 2020 U.S. Census Bureau: American Community Survey			

- As highlighted in Table 23, the AA population grew at a comparable rate as the state of Texas but slightly below the MSA from 2015 to 2020.
- According to the 2022 ACS, San Antonio is the second most populous city in the state of Texas.
- A community contact attributed the AA's significant population growth to individuals moving to the region for employment opportunities.

Table 24

Area	2015 Median Family Income	2020 Median Family Income	Percent Change
San Antonio Metropolitan	65,092	70,053	7.6
Bexar County, TX	64,842	70,280	8.4
Medina County, TX	72,822	79,441	9.1
San Antonio-New Braunfels, TX MSA	67,989	74,284	9.3
Texas	68,523	76,073	11.0

Header rows for Table 24:
Median Family Income Change
Assessment Area: San Antonio Metropolitan

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

- While the AA's MFI grew between 2015 and 2020, it grew at a slower rate than the statewide MFI, signifying a decline of the AA's local wage economy compared to other geographies in the state.
- According to the 2023 FFIEC Census data, 41.6 percent of the 433,294 families in the AA are considered LMI.
- Of the total families domiciled within the AA, 11.8 percent report income levels below the poverty level, which is slightly above the statewide poverty level of 10.6 percent.

Table 25
Housing Cost Burden
Assessment Area: San Antonio Metropolitan

Area	Cost Burden – Renters			Cost Burden - Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
San Antonio Metropolitan	79.1	48.7	45.1	57.4	32.9	20.3
Bexar County, TX	79.2	49.0	45.2	57.7	33.6	20.4
Medina County, TX	65.2	26.3	33.9	49.4	14.7	15.9
San Antonio-New Braunfels, TX MSA	78.4	48.6	43.9	57.1	32.0	19.5
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

- The housing cost burden for LMI individuals is slightly higher in the AA than the statewide average for both renters and homeowners, as demonstrated in Table 25.
- Of the housing units in the AA, 54.3 percent are owner-occupied, 37.7 percent are rental, and 8.5 percent are vacant.
- A community contact indicated the need for affordable housing has increased given the area's population growth. The contact expects this trend to continue in the coming years.

Table 26

Unemployment Rates Assessment Area: San Antonio Metropolitan					
Area	**2019**	**2020**	**2021**	**2022**	**2023**
San Antonio Metropolitan	3.2	7.6	5.3	3.7	4.0
Bexar County, TX	3.2	7.6	5.3	3.7	4.0
Medina County, TX	3.2	6.4	5.0	3.8	4.0
San Antonio-New Braunfels, TX MSA	3.1	7.3	5.2	3.6	3.9
Texas	3.5	7.7	5.6	3.9	4.2
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- As noted in Table 26, the AA unemployment rates have been comparable to the statewide rates in the past five years.
- The sharp increase in the 2020 unemployment rates is primarily attributed to the COVID-19 pandemic and the related restrictions placed to prevent contagion, such as the executive orders limiting gatherings of certain sizes. As a result, many businesses downsized or closed their operations. Following 2020, the AA unemployment rates consistently declined, stabilizing to pre-pandemic levels in 2022.
- Major industries that provide employment opportunities in the AA include healthcare and social services and professional and technical services.
- A representative of an area organization that promotes economic development stated that workforce development is a need in the AA. Specifically, there is a need for individuals with qualified technical expertise to support small businesses start-ups in the AA.

Table 27 details selected characteristics of the AA.

Table 27

2023 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-income	35	9.1	28,772	6.6	9,445	32.8	103,232	23.8
Moderate-income	139	36.0	142,249	32.8	25,872	18.2	76,976	17.8
Middle-income	108	28.0	129,285	29.8	10,930	8.5	84,994	19.6
Upper-income	100	25.9	132,988	30.7	4,882	3.7	168,092	38.8
Unknown-income	4	1.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**386**	**100.0**	**433,294**	**100.0**	**51,129**	**11.8**	**433,294**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	52,666	18,604	4.8	35.3	28,356	53.8	5,706	10.8
Moderate-income	252,435	114,388	29.3	45.3	114,937	45.5	23,110	9.2
Middle-income	208,930	122,851	31.5	58.8	71,912	34.4	14,167	6.8
Upper-income	204,318	133,992	34.4	65.6	55,499	27.2	14,827	7.3
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	**718,349**	**389,835**	**100.0**	**54.3**	**270,704**	**37.7**	**57,810**	**8.0**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	5,271	6.3	4,662	6.0	567	11.2	42	5.3
Moderate-income	22,996	27.5	21,227	27.3	1,634	32.2	135	17.0
Middle-income	21,888	26.2	20,486	26.4	1,223	24.1	179	22.5
Upper-income	33,163	39.7	31,115	40.1	1,612	31.7	436	54.8
Unknown-income	179	0.2	133	0.2	42	0.8	4	0.5
Total Assessment Area	**83,497**	**100.0**	**77,623**	**100.0**	**5,078**	**100.0**	**796**	**100.0**
	Percentage of Total Businesses:		**93.0**		**6.1**		**1.0**	
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	13	1.4	13	1.5	0	0.0	0	0.0
Moderate-income	156	17.3	154	17.4	2	13.3	0	0.0
Middle-income	272	30.2	264	29.8	8	53.3	0	0.0
Upper-income	461	51.1	456	51.4	5	33.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	**902**	**100.0**	**887**	**100.0**	**15**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**98.3**		**1.7**			**0.0**

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Vantage's lending test performance in the San Antonio Metropolitan AA is adequate.

For this evaluation, the bank's small business lending carried more weight when determining the overall lending performance in the AA, as it comprises the largest volume of lending in the area and aligns with Vantage's strategic focus on commercial lending.

Lending Activity

The bank's lending activity reflects adequate responsiveness to AA credit needs. While Vantage makes limited use of innovative and/or flexible lending practices, the bank's products appropriately serve AA credit needs. While Vantage ranks among the top 50 financial institutions in the AA, the bank only holds 0.4 percent of the deposit market share, which highlights the high level of competition within the AA.

Table 28

Summary of Lending Activity January 1, 2022 through December 31, 2022 Assessment Area: San Antonio Metropolitan				
Loan Type	**#**	**%**	**$(000)**	**%**
Home Purchase	78	29.7	34,015	37.2
Refinancing	11	4.2	4,678	5.1
Home Improvement	0	0.0	0	0.0
Multifamily	2	0.8	1,250	1.4
Other Purpose Closed/Exempt	0	0.0	0	0.0
Total HMDA	**91**	**34.6**	**39,943**	**43.7**
Total Small Business	**169**	**64.3**	**51,104**	**56.0**
Total Small Farm	**3**	**1.1**	**284**	**0.3**
TOTAL LOANS	**263**	**100.0**	**91,331**	**100.0**
Note: Percentages may not total 100.0 percent due to rounding.				

Geographic Distribution of Loans

Vantage's geographic distribution of lending reflects excellent penetration throughout the AA. The bank's home mortgage lending reflects adequate penetration and small business lending reflects excellent penetration among geographies of different income levels, especially LMI geographies. Loans were generally made in proximity to Vantage's branches, and no conspicuous gaps or anomalies in lending patterns were noted.

The bank's lending in middle- and upper-income geographies did not affect conclusions about Vantage's performance in LMI census tracts.

Residential Real Estate (HMDA) Lending

The geographic distribution of total HMDA loans reflects adequate penetration throughout the AA based on the bank's performance in comparison to the percentage of owner-occupied housing units located in LMI census tracts (the demographic figure) and the aggregate lending data in the AA.

Among low-income census tracts in 2022, Vantage's performance is comparable to that of aggregate lenders but below the demographic figure. In 2023, the bank's home mortgage lending among low-income census tracts improved, exceeding aggregate data, while remaining below the demographic figure. However, it is notable that aggregate lending among low-income census tracts in 2023 was also well below the demographic figure.

In 2022 and 2023, the bank's total home mortgage lending among moderate-income census tracts was significantly below aggregate lending data and the demographic figure. Vantage's lending among moderate-income census tracts declined slightly between 2022 and 2023, while aggregate lending in these tracts increased, widening the already significant gap. Additionally, Vantage's total volume of home mortgage lending decreased during the review period, falling from 52 total loans in 2022 to 39 total loans in 2023. Similarly, total HMDA lending in the AA decreased during the review period, falling from 47,339 originations in 2022 to 35,358 in 2023. This decrease is primarily attributed to the raising interest rate environment, which made mortgage loans progressively more expensive and resulted in decreased demand and increased competition among lenders for the shrinking volume of lending opportunities in LMI tracts. Community contacts noted affordable housing as a significant CD need within the AA.

No conspicuous gaps or anomalies were identified in the bank's lending. The distribution of the remainder of Vantage's lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

Tables 29A and 29B provide details about the bank's 2022 and 2023 home mortgage lending by income level of geography within the AA.

Home Purchase Lending

The geographic distribution of home purchase lending is adequate. The distribution of home purchase loans among low-income census tracts in 2022 and 2023 exceeded the level of aggregate lending but fell below the percentage of AA owner-occupied units in such tracts.

In 2022 and 2023, the bank's home purchase lending among moderate-income census tracts was significantly below aggregate lending data and the demographic figure. While Vantage's performance increased in 2023, this improvement was offset by similar growth in aggregate lending among moderate-income census tracts, resulting in the bank's performance remaining far below that reflected in aggregate lending data. Additionally, there is significant competition among financial institutions operating in the AA.

Table 29A

Distribution of 2022 and 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: San Antonio Metropolitan												
	Bank And Aggregate Loans By Year											**Owner Occupied Units %**
Geographic Income Level	**2022**						**2023**					
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Home Purchase Loans													
Low	1	2.3	2.2	200	1.0	1.4	1	2.9	2.0	72	0.5	1.3	4.8
Moderate	1	2.3	17.8	128	0.6	12.6	2	5.7	20.6	406	3.0	14.8	29.3
Middle	7	16.3	34.7	2,302	11.2	28.8	5	14.3	32.3	852	6.4	27.2	31.5
Upper	34	79.1	45.4	18,007	87.3	57.2	27	77.1	45.1	12,048	90.1	56.7	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	43	100.0	100.0	20,637	100.0	100.0	35	100.0	100.0	13,378	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.4	0	0.0	1.4	0	0.0	3.5	0	0.0	2.8	4.8
Moderate	2	28.6	20.4	813	38.3	14.1	0	0.0	25.8	0	0.0	19.2	29.3
Middle	2	28.6	33.2	495	23.3	27.3	2	50.0	32.3	445	17.4	26.8	31.5
Upper	3	42.9	44.1	815	38.4	57.3	2	50.0	38.4	2,110	82.6	51.1	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	7	100.0	100.0	2,123	100.0	100.0	4	100.0	100.0	2,555	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.4	0	0.0	1.6	0	0.0	2.2	0	0.0	2.1	4.8
Moderate	0	0.0	18.6	0	0.0	14.7	0	0.0	20.5	0	0.0	16.1	29.3
Middle	0	0.0	24.9	0	0.0	19.4	0	0.0	25.0	0	0.0	19.4	31.5
Upper	0	0.0	54.0	0	0.0	64.3	0	0.0	52.3	0	0.0	62.5	34.4
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	0	0.0	7.8	0	0.0	5.2	0	0.0	9.5	0	0.0	11.8	10.0
Moderate	0	0.0	45.5	0	0.0	35.8	0	0.0	46.4	0	0.0	29.3	41.0
Middle	0	0.0	29.3	0	0.0	31.5	0	0.0	22.6	0	0.0	23.2	24.0
Upper	2	100.0	17.4	1,250	100.0	27.6	0	0.0	21.4	0	0.0	35.6	25.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	1,250	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	1	1.9	2.2	200	0.8	1.9	1	2.6	2.3	72	0.5	2.2	4.8
Moderate	3	5.8	18.7	941	3.9	15.9	2	5.1	21.4	406	2.5	16.3	29.3
Middle	9	17.3	34.0	2,797	11.6	28.8	7	17.9	31.8	1,297	8.1	26.8	31.5
Upper	39	75.0	45.1	20,072	83.6	53.5	29	74.4	44.5	14,158	88.9	54.7	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	52	100.0	100.0	24,010	100.0	100.0	39	100.0	100.0	15,933	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 29B

Geographic Income Level	\multicolumn{11}{c}{Distribution of 2022 and 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: San Antonio Metropolitan}	Owner Occupied Units %

Geographic Income Level	Bank #	Bank #%	Agg #%	Bank $(000)	Bank $%	Agg $%	Bank #	Bank #%	Agg #%	Bank $(000)	Bank $%	Agg $%	Owner Occupied Units %
**Other Purpose LOC**
Low	0	0.0	1.0	0	0.0	0.5	0	0.0	1.5	0	0.0	1.0	4.8
Moderate	0	0.0	11.2	0	0.0	8.8	0	0.0	15.6	0	0.0	12.1	29.3
Middle	0	0.0	22.6	0	0.0	16.3	0	0.0	22.8	0	0.0	18.2	31.5
Upper	0	0.0	65.2	0	0.0	74.3	0	0.0	60.1	0	0.0	68.7	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
**Other Purpose Closed/Exempt**
Low	0	0.0	2.4	0	0.0	1.6	0	0.0	3.8	0	0.0	3.1	4.8
Moderate	0	0.0	22.9	0	0.0	15.6	0	0.0	22.1	0	0.0	20.0	29.3
Middle	0	0.0	28.1	0	0.0	21.3	0	0.0	26.0	0	0.0	22.9	31.5
Upper	0	0.0	46.7	0	0.0	61.5	0	0.0	48.1	0	0.0	54.0	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
**Purpose Not Applicable**
Low	0	0.0	3.4	0	0.0	3.7	0	0.0	3.6	0	0.0	1.9	4.8
Moderate	0	0.0	30.8	0	0.0	23.3	0	0.0	35.7	0	0.0	29.6	29.3
Middle	0	0.0	45.9	0	0.0	39.6	0	0.0	40.0	0	0.0	38.6	31.5
Upper	0	0.0	19.9	0	0.0	33.4	0	0.0	20.6	0	0.0	29.9	34.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 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 loans reflects excellent penetration throughout the AA. As noted in Table 30, Vantage's small business lending in 2022 and 2023 among LMI census tracts exceeded the performance of aggregate lenders as well as the percent of AA businesses located in these geographies. The bank's small business lending in low-income census tracts was slightly above aggregate lenders' performance in 2022 and improved to almost twice the level of aggregate lending in 2023. Further, among low-income census tracts, Vantage's level of lending outpaced the percentage of AA businesses located in these tracts.

Among moderate-income census tracts, the bank's lending was notably greater than aggregate lending in 2022 and remained elevated in 2023 despite a small decrease in lending reflected in both the bank's numbers and aggregate lending data. Vantage's lending was greater than the demographic figure in both years reviewed, while aggregate lending failed to reach the level of demographics.

A community contact noted the need for small business loans within the AA to help sustain small businesses. While the total volume of small business loans originated within the AA has

decreased since 2021, which is attributed to the cessation of the SBA's PPP and the raising interest rate environment, the bank's penetration of small business loans among LMI census tracts reflects favorably on Vantage's performance in meeting AA small business needs.

Table 30

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	6	6.5	5.7	1,309	4.9	8.5	8	10.4	5.4	2,397	9.9	7.8	6.3
Moderate	30	32.6	24.3	8,719	32.4	25.4	24	31.2	24.0	6,201	25.6	24.1	27.5
Middle	10	10.9	24.6	2,986	11.1	21.5	14	18.2	24.3	2,596	10.7	22.3	26.2
Upper	46	50.0	44.8	13,869	51.6	43.9	31	40.3	45.9	13,027	53.8	45.4	39.7
Unknown	0	0.0	0.3	0	0.0	0.5	0	0.0	0.2	0	0.0	0.3	0.2
Total	92	100.0	100.0	26,883	100.0	100.0	77	100.0	100.0	24,221	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.*

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

The bank's distribution of lending to borrowers reflects a poor penetration among individuals of different income levels and businesses of different revenue sizes.

The distribution of Vantage's lending to middle- and upper-income borrowers did not affect conclusions about the bank's performance considering its lending to low- and moderate-income borrowers.

Residential Real Estate (HMDA) Lending

Vantage's home mortgage lending by borrower income in the AA is poor when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the AA. As shown in Tables 31A and 31B, the bank's distribution of home mortgage loans among low-income borrowers in 2022 and 2023 was slightly below aggregate data, and both the bank and aggregate lenders reflected lending substantially below the percentage of AA families classified as low-income. The low level of lending by both the bank and aggregate lenders is reflective of low loan demand among LMI borrowers. Moreover, the raising interest rate environment may make mortgage loans unaffordable for LMI borrowers.

In 2022, the bank's home mortgage lending to moderate-income borrowers was below aggregate data and substantially below the percentage of moderate-income families in the AA. In 2023, Vantage did not originate any home mortgage loans to moderate-income borrowers.

Table 31A

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	1	2.3	2.2	88	0.4	1.1	1	2.9	2.0	72	0.5	0.9	23.8
Moderate	2	4.7	15.3	363	1.8	10.6	0	0.0	14.7	0	0.0	10.4	17.8
Middle	4	9.3	23.0	839	4.1	20.4	3	8.6	21.3	637	4.8	18.8	19.6
Upper	28	65.1	36.7	16,609	80.5	45.3	27	77.1	32.1	11,937	89.2	41.1	38.8
Unknown	8	18.6	22.8	2,738	13.3	22.6	4	11.4	29.9	732	5.5	28.8	0.0
Total	43	100.0	100.0	20,637	100.0	100.0	35	100.0	100.0	13,378	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	6.6	0	0.0	3.5	0	0.0	7.7	0	0.0	3.8	23.8
Moderate	1	14.3	18.6	147	6.9	12.9	0	0.0	17.5	0	0.0	11.3	17.8
Middle	0	0.0	20.9	0	0.0	17.9	0	0.0	21.5	0	0.0	17.4	19.6
Upper	5	71.4	37.0	1,696	79.9	48.0	4	100.0	36.5	2,555	100.0	46.9	38.8
Unknown	1	14.3	16.9	280	13.2	17.7	0	0.0	16.8	0	0.0	20.6	0.0
Total	7	100.0	100.0	2,123	100.0	100.0	4	100.0	100.0	2,555	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.4	0	0.0	3.5	0	0.0	9.0	0	0.0	5.3	23.8
Moderate	0	0.0	16.0	0	0.0	10.9	0	0.0	15.8	0	0.0	11.5	17.8
Middle	0	0.0	20.2	0	0.0	15.6	0	0.0	20.9	0	0.0	15.8	19.6
Upper	0	0.0	54.0	0	0.0	66.8	0	0.0	51.9	0	0.0	63.1	38.8
Unknown	0	0.0	3.4	0	0.0	3.2	0	0.0	2.4	0	0.0	4.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	1	2.0	3.6	88	0.4	1.6	1	2.6	3.2	72	0.5	1.3	23.8
Moderate	3	6.0	15.9	510	2.2	11.0	0	0.0	15.0	0	0.0	10.5	17.8
Middle	4	8.0	22.0	839	3.7	19.7	3	7.7	21.2	637	4.0	18.6	19.6
Upper	33	66.0	37.1	18,305	80.4	46.1	31	79.5	33.5	14,492	91.0	41.9	38.8
Unknown	9	18.0	21.5	3,018	13.3	21.7	4	10.3	27.1	732	4.6	27.8	0.0
Total	50	100.0	100.0	22,760	100.0	100.0	39	100.0	100.0	15,933	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 31B

Borrower Income Level	Bank And Aggregate Loans By Year											Families by Family Income %
	2022					2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	7.2	0	0.0	5.9	0	0.0	7.2	0	0.0	6.2	23.8
Moderate	0	0.0	13.6	0	0.0	9.1	0	0.0	16.0	0	0.0	11.2	17.8
Middle	0	0.0	17.7	0	0.0	12.3	0	0.0	23.1	0	0.0	16.8	19.6
Upper	0	0.0	57.0	0	0.0	68.1	0	0.0	52.9	0	0.0	65.2	38.8
Unknown	0	0.0	4.5	0	0.0	4.6	0	0.0	0.8	0	0.0	0.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	9.5	0	0.0	5.0	0	0.0	8.8	0	0.0	6.2	23.8
Moderate	0	0.0	19.0	0	0.0	12.1	0	0.0	17.7	0	0.0	12.3	17.8
Middle	0	0.0	19.7	0	0.0	14.2	0	0.0	24.1	0	0.0	18.3	19.6
Upper	0	0.0	48.1	0	0.0	63.6	0	0.0	43.7	0	0.0	53.2	38.8
Unknown	0	0.0	3.7	0	0.0	5.2	0	0.0	5.7	0	0.0	10.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	2.1	0	0.0	1.1	0	0.0	2.4	0	0.0	1.6	23.8
Moderate	0	0.0	1.1	0	0.0	1.1	0	0.0	1.7	0	0.0	1.0	17.8
Middle	0	0.0	0.1	0	0.0	0.1	0	0.0	0.2	0	0.0	0.3	19.6
Upper	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0	0	0.0	0.0	38.8
Unknown	0	0.0	96.6	0	0.0	97.4	0	0.0	95.6	0	0.0	97.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

Source: 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

Vantage's borrower distribution of small business loans by revenue size is poor. As noted in Table 32, the bank's 2022 and 2023 distribution of small business loans to businesses with revenues of $1 million or less was significantly below aggregate lending data and the percentage of small businesses within the AA. Aggregate lending data during the review period significantly outperformed the bank. Thus, the disparity between Vantage's lending performance and that of aggregate lenders reflects negatively on the bank's responsiveness to credit needs in the AA. Additionally, Vantage's distribution of loans to small businesses declined since the previous evaluation primarily due to the cessation of the SBA's PPP in May 2021.

Nevertheless, a material volume of small business loans extended by Vantage in both 2022 and 2023 were made to businesses with unknown revenues. The loans made to businesses with unknown revenues are attributed to a flexible loan product secured by certificates of deposit offered by the bank.   Vantage's participation in this flexible product reflects favorably on the bank's responsiveness to the credit needs of businesses in the AA but does not fully remedy the disparity between the bank's lending to businesses with revenues of $1 million or less and aggregate lending data.

Table 32

												Total Businesses %
Distribution of 2022 and 2023 Small Business Lending by Revenue Size of Businesses											
Assessment Area: San Antonio Metropolitan											
	Bank And Aggregate Loans By Year											
	2022					**2023**						
	Bank	**Agg**	**Bank**	**Agg**		**Bank**	**Agg**	**Bank**	**Agg**		
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue											
$1 Million or Less	26	28.3	46.3	8,134	30.3	29.0	18	23.4	50.0	5,579	23.0	30.4	93.0
Over $1 Million	55	59.8		16,492	61.3		43	55.8		14,298	59.0		6.1
Revenue Unknown	11	12.0		2,257	8.4		16	20.8		4,344	17.9		1.0
Total	92	100.0		26,883	100.0		77	100.0		24,221	100.0		100.0
By Loan Size											
$100,000 or Less	35	38.0	93.4	1,994	7.4	35.7	29	37.7	93.7	1,773	7.3	37.0	
$100,001 - $250,000	17	18.5	3.4	3,141	11.7	16.1	11	14.3	3.3	1,788	7.4	16.3	
$250,001 - $1 Million	40	43.5	3.2	21,748	80.9	48.2	37	48.1	3.0	20,660	85.3	46.8	
Total	92	100.0	100.0	26,883	100.0	100.0	77	100.0	100.0	24,221	100.0	100.0	
By Loan Size and Revenues $1 Million or Less											
$100,000 or Less	11	42.3		484	6.0		4	22.2		224	4.0		
$100,001 - $250,000	4	15.4		637	7.8		4	22.2		669	12.0		
$250,001 - $1 Million	11	42.3		7,013	86.2		10	55.6		4,686	84.0		
Total	26	100.0		8,134	100.0		18	100.0		5,579	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 Lending

Vantage made a low level of CD loans in the San Antonio Metropolitan AA during the review period. As reflected in Table 33, the bank only originated one qualified CD loan in the AA. Additionally, Vantage's CD lending by number volume reflects a significant decrease of 93.0 percent by number of originations and 76.0 percent by dollar value since the previous evaluation. While the decrease in CD lending within the AA is primarily attributed to the cessation of the SBA's PPP, community contacts identified significant affordable housing and small business needs and associated CD opportunities within the AA. Therefore, the CD lending performance reflects poorly on Vantage's responsiveness of meeting the AA's CD and credit needs.

Table 33

Community Development Lending		
Assessment Area: San Antonio Metropolitan		
Purpose	**#**	**$(000)**
Affordable Housing	0	0
Community Services	0	0
Economic Development	0	0
Revitalization and Stabilization	1	13,403
Totals	**1**	**13,403**

INVESTMENT TEST

Vantage's performance under the investment test in the AA is good. While the bank is rarely in a leadership position, it has an adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors. Vantage makes occasional use of innovative or complex investments to support CD initiatives and exhibits adequate responsiveness to AA credit needs. During the review period, the bank's investments primarily focused on affordable housing, community services targeted at LMI individuals, and economic development, which reflects favorably on the Vantage's responsiveness as community contacts emphasized these as CD needs in the AA.

Table 34 illustrates the bank's CD investments and donations within the AA, including prior period investments that remain on the bank's books, current period investments purchased during the review period, and CD donations made since the previous evaluation. Examples of notable investment and donation activities that reflect Vantage's efforts to meet the CD and credit needs of the AA include:

- A $2.2 million bond to support affordable housing for LMI individuals and families.
- A $14,000 donation to a local chamber of commerce to support technical services for regional small businesses in the AA.

Table 34

Community Development Purpose	Prior Period Investments[1]		Current Investments[2]		Donations		Total	
	#	$(000)	#	$(000)	#	$(000)	#	$(000)
Affordable Housing	2	3,733	0	0	0	0	2	3,733
Community Services	0	0	0	0	12	23	12	23
Economic Development	0	0	0	0	6	24	6	24
Revitalization and Stabilization	1	1,717	0	0	0	0	1	1,717
Total	**3**	**5,450**	**0**	**0**	**18**	**47**	**21**	**5,497**

Investments, Grants, and Donations
Assessment Area: San Antonio Metropolitan

[1] Book Value of Investment
[2] Original Market Value of Investment

SERVICE TEST

Vantage's service test performance in the AA is adequate. The conclusion is supported by the type and level of retail and CD services, including accessibility of branches in comparison with the population within LMI geographies, availability of alternative delivery systems, changes in branch locations, and reasonableness of services.

Retail Services

The bank's delivery systems are accessible to the geographies and individuals of different income levels in the AA. The distribution of Vantage's three branch offices and three ATMs as of June 30, 2024, was compared to the distribution of the population and businesses among the tract categories within the AA. While the bank does not operate any branches in moderate-income census tracts, it has a presence in low-income areas. Additionally, several branches are adjacent to LMI geographies. Table 35 summarizes the bank's retail locations in the AA.

Table 35

Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	9.1	7.0	1.4	1	33.3	1	33.3
Moderate	36.0	35.0	17.3	0	0.0	0	0.0
Middle	28.0	29.4	30.2	1	33.3	1	33.3
Upper	25.9	28.8	51.1	1	33.3	1	33.3
Unknown	1.0	0.0	0.0	0	0.0	0	0.0
Total	**100.0**	**100.0**	**100.0**	**3**	**100.0**	**3**	**100.0**

(Table title: Branch and Full-Service ATM Locations, Assessment Area: San Antonio Metropolitan)

Vantage did not open or close any branches in the AA during the review period; as such, its record of opening or closing branches was not evaluated. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are consistent throughout the AA.

Community Development Services

Vantage provides an adequate level of CD services in the AA. The bank's employees served nine organizations in various capacities, providing 18 CD services targeted to LMI individuals for a total of 274 hours. Vantage's CD services significantly increased since the prior CRA evaluation, which is attributed to the resumption of in-person activities since the COVID-19 pandemic. Examples of CD services performed include:

- An employee provided financial literacy and resources at a school where 96.5 percent of the students are LMI.
- An employee served on the board of directors for an organization that promotes community services for LMI individuals and families in the AA.

Table 36 shows the number of hours by CD purpose.

Table 36

Purpose	Total Services	Total Hours	Total Organizations
Affordable Housing	0	0	0
Community Services	13	154	7
Economic Development	5	120	2
Revitalization and Stabilization	0	0	0
Total	**18**	**274**	**9**

(Table title: Community Development Services, Assessment Area: San Antonio Metropolitan)

FORT WORTH METROPOLITAN ASSESSMENT AREA
(Full-Scope Review)

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

- The Fort Worth Metropolitan AA is comprised of the entirety of Tarrant County, which is a portion of the Fort-Worth-Arlington Grapevine Metropolitan Division (MD). The delineation of the AA excludes the counties of Johnson, Parker, and Wise. Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- There have been no changes to the delineation of the AA since the previous evaluation.
- According to the 2020 ACS data, the AA is comprised of 449 census tracts: 35 low-, 130 moderate-, 140 middle-, and 139 upper-income geographies, as well as five census tracts with unknown income.
- As of June 30, 2024, Vantage operates two branches in the AA, representing 8.7 percent of its total branches. Both branches within the AA are located in upper-income census tracts.
- According to the June 30, 2024, FDIC Deposit Market Share Report, the bank holds 1.0 percent of the deposit market share, ranking 19th among 73 FDIC-insured depository institutions operating in the AA.
- In 2023, 756 institutions originated or purchased 42,875 HMDA-reportable loans in the AA. Vantage ranked 97th, originating 59 or 0.1 percent of total loans. Additionally, the bank ranked 65th among 208 institutions originating or purchasing CRA-reportable loans in the AA in 2023. The bank originated 21 of the 52,792 or less than 0.1 percent of CRA-reportable loans in the AA.
- Examiners interviewed a representative of a local small business development center and a representative of an affordable housing agency. The community contacts noted affordable housing and small business lending as the central needs within the AA.

Table 37

Population Change Assessment Area: Fort Worth Metropolitan			
Area	2015 Population	2020 Population	Percent Change
Fort Worth Metropolitan	1,914,526	2,110,640	10.2
Fort Worth-Arlington-Grapevine, TX MD	2,252,637	2,507,421	11.3
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 highlighted in Table 37, the AA population experienced significant growth between 2015 and 2020, slightly higher than the statewide growth rate.
- Fort Worth is the fifth most populous city in the state of Texas, according to the U.S. Census Bureau data.
- The significant population growth is attributed to employment opportunities offered by the regional aerospace defense, oil and gas, and healthcare industries located in the AA.

Table 38

Area	2015 Median Family Income	2020 Median Family Income	Percent Change
Fort Worth Metropolitan	76,367	82,856	8.5
Fort Worth-Arlington-Grapevine, TX MD	75,758	82,649	9.1
Texas	68,523	76,073	11.0

Median Family Income Change
Assessment Area: Fort Worth Metropolitan

Source: 2011 - 2015 U.S. Census Bureau: American Community Survey
2016 – 2020 U.S. Census Bureau: American Community Survey
Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.

- As Table 38 demonstrates, the MFI in the AA grew between 2015 and 2020 at a slower rate than the state of Texas; however, it remained 8.9 percent higher.
- ACS 2020 data estimates that 500,989 families reside in the AA, of which 38.8 percent are considered LMI.
- According to the 2023 FFIEC Census data, 10.4 percent of AA households live below the poverty level, which is slightly below the statewide figure of 13.9 percent. This indicates that households within the AA generally have slightly more income than families who reside in other regions of the state.

Table 39

Housing Cost Burden
Assessment Area: Fort Worth Metropolitan

Area	Cost Burden – Renters			Cost Burden - Owners		
	Low-Income	Moderate-Income	All Renters	Low-Income	Moderate-Income	All Owners
Fort Worth Metropolitan	83.5	47.8	44.0	64.1	34.6	19.2
Fort Worth-Arlington-Grapevine, TX MD	82.1	46.5	43.4	61.4	33.0	18.7
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

- Housing affordability within the AA for low-income renters is a substantially greater burden than the burden on households at any other level.
- As illustrated in Table 39, the housing cost burden for LMI renters and homeowners within the AA is higher than the statewide figures, indicating that housing is generally less affordable within the AA than in other areas of the state.
- A community contact noted that there are many barriers to homeownership for LMI families within the AA, such as poor credit history, downpayment requirements, and high interest rates.
- Of the housing units in the AA, 55.8 percent are owner-occupied, 36.8 percent are rental, and 7.4 percent are vacant.

Table 40

Unemployment Rates Assessment Area: Fort Worth Metropolitan					
Area	**2019**	**2020**	**2021**	**2022**	**2023**
Fort Worth Metropolitan	3.3	7.4	5.3	3.6	3.9
Fort Worth-Arlington-Grapevine, TX MD	3.3	7.2	5.2	3.6	3.9
Texas	3.5	7.7	5.6	3.9	4.2
Source: Bureau of Labor Statistics: Local Area Unemployment Statistics					

- As noted in Table 40, the AA unemployment rates between 2019 and 2023 were slightly below the statewide unemployment rates.
- Unemployment rates peaked in 2020 as a result of the COVID-19 pandemic; however, they stabilized in 2022, reaching pre-pandemic levels.
- Major industries that provide employment opportunities in the AA are health care and social assistance, retail trade, and accommodation and food services.
- Major employers within the AA include Alcon Laboratories, Bell Technical Services, Lockheed Martin Corporation, Texas Health Resources, and GM Financial.

Table 41 details selected characteristics of the AA.

Table 41

2023 Combined Demographics **Assessment Area: Fort Worth Metropolitan**								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low-income	35	7.8	27,035	5.4	8,129	30.1	106,209	21.2
Moderate-income	130	29.0	125,780	25.1	18,427	14.7	88,143	17.6
Middle-income	140	31.2	172,590	34.4	11,117	6.4	101,401	20.2
Upper-income	139	31.0	173,348	34.6	4,447	2.6	205,236	41.0
Unknown-income	5	1.1	2,236	0.4	157	7.0	0	0.0
Total Assessment Area	**449**	**100.0**	**500,989**	**100.0**	**42,277**	**8.4**	**500,989**	**100.0**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	53,340	11,895	2.7	22.3	33,862	63.5	7,583	14.2
Moderate-income	209,902	89,120	20.5	42.5	101,816	48.5	18,966	9.0
Middle-income	265,807	155,834	35.8	58.6	94,038	35.4	15,935	6.0
Upper-income	247,088	176,933	40.6	71.6	55,534	22.5	14,621	5.9
Unknown-income	4,244	1,761	0.4	41.5	1,653	38.9	830	19.6
Total Assessment Area	**780,381**	**435,543**	**100.0**	**55.8**	**286,903**	**36.8**	**57,935**	**7.4**
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	4,519	4.3	4,158	4.3	333	5.5	28	2.6
Moderate-income	23,184	22.1	21,079	21.6	1,926	31.9	179	16.4
Middle-income	31,912	30.5	30,331	31.1	1,321	21.9	260	23.8
Upper-income	44,552	42.5	41,543	42.5	2,388	39.6	621	56.8
Unknown-income	626	0.6	552	0.6	68	1.1	6	0.5
Total Assessment Area	**104,793**	**100.0**	**97,663**	**100.0**	**6,036**	**100.0**	**1,094**	**100.0**
	Percentage of Total Businesses:		**93.2**		**5.8**		**1.0**	
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low-income	7	1.0	6	0.9	1	9.1	0	0.0
Moderate-income	91	13.2	90	13.2	1	9.1	0	0.0
Middle-income	191	27.6	190	27.9	1	9.1	0	0.0
Upper-income	396	57.3	388	57.1	8	72.7	0	0.0
Unknown-income	6	0.9	6	0.9	0	0.0	0	0.0
Total Assessment Area	**691**	**100.0**	**680**	**100.0**	**11**	**100.0**	**0**	**0.0**
	Percentage of Total Farms:		**98.4**		**1.6**		**0.0**	

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Vantage's lending test performance in the Fort Worth Metropolitan AA is adequate.

For this evaluation, the bank's small business lending carried more weight when determining the overall lending performance in the AA, as it comprised the largest volume of lending in the area and aligns with Vantage's strategic focus on commercial lending. Additionally, an evaluation of refinance, home improvement, multifamily, and purpose not applicable loans were not conducted due to limited origination volumes during the review period.

Lending Activity

The bank's lending activity reflects adequate responsiveness to AA credit needs although limited use of innovative and/or flexible lending practices were noted. Vantage ranks among the top 50 financial institutions in the AA; however, it only holds 1.0 percent of the deposit market share, highlighting a high level of competition.

Table 42

Summary of Lending Activity January 1, 2022 through December 31, 2022 Assessment Area: Fort Worth				
Loan Type	**#**	**%**	**$(000)**	**%**
Home Purchase	61	50.0	30,818	50.2
Refinancing	13	10.7	13,037	21.2
Home Improvement	0	0.0	0	0.0
Multifamily	0	0.0	0	0.0
Other Purpose Closed/Exempt	2	1.6	410	0.7
Total HMDA	**76**	**62.3**	**44,265**	**72.1**
Total Small Business	**46**	**37.7**	**17,102**	**27.9**
Total Small Farm	**0**	**0.0**	**0**	**0.0**
TOTAL LOANS	**122**	**100.0**	**61,367**	**100.0**
Note: Percentages may not total 100.0 percent due to rounding.				

Geographic Distribution of Loans

Vantage's geographic distribution of loans reflects adequate penetration throughout the AA. While the bank's small business lending reflects adequate distribution, home mortgage lending's penetration among geographies of different income levels, especially LMI geographies, is excellent. Greater weight was given to small business lending based on the bank's strategic focus on commercial lending and lower level of HMDA lending. Loans were generally made in proximity to Vantage's branches, and no conspicuous gaps or anomalies in lending patterns were noted.

The bank's lending in middle- and upper-income geographies did not affect conclusions about Vantage's performance considering its lending in LMI geographies.

Vantage's volume of HMDA lending in 2022 would not have provided a meaningful analysis, as each origination accounts for 5.9 percent of the bank's lending, skewing the analysis. In 2023, Vantage increased its HMDA lending by 71.2 percent, allowing for a meaningful analysis of the bank's performance to be conducted. For the evaluation of this AA, only the bank's 2023 HMDA lending was considered, while lending tables reflect all HMDA originations during the review period.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA loans reflects excellent penetration throughout the AA when compared to the percentage of owner-occupied housing units located in LMI census tracts (the demographic figure) and to aggregate lending data in the AA.

The bank's 2023 HMDA lending among low-income census tracts in the AA was more than double the percentage of aggregate lending in these tracts, and well above the demographic figure. Among moderate-income census tracts, Vantage's lending was also significantly greater than aggregate lending and above the demographic figure. The bank's home mortgage lending, particularly in LMI census tracts, reflects favorably on Vantage's responsiveness in meeting the AA's credit needs.

Tables 43A and 43B provide details about the bank's 2022 and 2023 home mortgage lending by income level of geography within the AA.

Home Purchase Lending

The geographic distribution of home purchase lending is excellent. The distribution of the bank's home purchase loans among low-income census tracts in 2023 was significantly higher than aggregate lenders in the AA, which was also above the demographic figure. Among moderate-income census tracts, Vantage's home purchase lending performance was similarly above that of aggregate lending data and the demographic figure. While the bank's branch locations are generally in the western portion of the AA, Vantage's lending extends into the LMI geographies of Fort Worth in the central and eastern portions of the AA. This dispersion reflects favorably on the bank's responsiveness to the credit needs of the AA.

Table 43A

Distribution of 2022 and 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: Fort Worth Metropolitan												

	Bank And Aggregate Loans By Year											Owner Occupied Units %
Geographic Income Level	2022					2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.6	0	0.0	1.6	3	5.7	2.9	360	1.4	1.9	2.7
Moderate	1	12.5	16.3	496	10.9	11.1	14	26.4	16.1	3,433	13.1	11.6	20.5
Middle	1	12.5	34.3	272	6.0	29.5	7	13.2	36.1	2,395	9.1	31.9	35.8
Upper	6	75.0	46.5	3,778	83.1	57.6	29	54.7	44.7	20,084	76.4	54.4	40.6
Unknown	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0.4
Total	8	100.0	100.0	4,546	100.0	100.0	53	100.0	100.0	26,272	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	1.7	0	0.0	1.1	1	25.0	2.8	128	5.8	1.8	2.7
Moderate	0	0.0	15.6	0	0.0	10.3	2	50.0	19.3	455	20.5	13.8	20.5
Middle	1	11.1	38.1	150	1.4	30.5	0	0.0	37.0	0	0.0	28.7	35.8
Upper	8	88.9	44.3	10,670	98.6	57.8	1	25.0	40.5	1,634	73.7	55.3	40.6
Unknown	0	0.0	0.3	0	0.0	0.3	0	0.0	0.4	0	0.0	0.3	0.4
Total	9	100.0	100.0	10,820	100.0	100.0	4	100.0	100.0	2,217	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.5	0	0.0	1.1	0	0.0	1.9	0	0.0	1.8	2.7
Moderate	0	0.0	10.5	0	0.0	7.7	0	0.0	14.0	0	0.0	10.5	20.5
Middle	0	0.0	28.6	0	0.0	22.4	0	0.0	31.1	0	0.0	24.5	35.8
Upper	0	0.0	58.8	0	0.0	68.4	0	0.0	52.4	0	0.0	62.6	40.6
Unknown	0	0.0	0.6	0	0.0	0.4	0	0.0	0.6	0	0.0	0.6	0.4
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans														Multi-family Units %
Low	0	0.0	10.7	0	0.0	5.4	0	0.0	22.9	0	0.0	15.7	14.1
Moderate	0	0.0	39.3	0	0.0	27.3	0	0.0	34.9	0	0.0	29.9	33.4
Middle	0	0.0	28.6	0	0.0	43.1	0	0.0	26.5	0	0.0	23.8	29.6
Upper	0	0.0	21.4	0	0.0	24.2	0	0.0	14.5	0	0.0	30.5	22.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.2	0	0.0	0.1	0.9
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans														Owner Occupied Units %
Low	0	0.0	2.3	0	0.0	2.1	4	6.8	2.8	488	1.7	3.0	2.7
Moderate	1	5.9	16.0	496	3.2	13.4	17	28.8	16.4	3,998	13.8	13.2	20.5
Middle	2	11.8	35.1	422	2.7	31.8	7	11.9	36.0	2,395	8.3	30.7	35.8
Upper	14	82.4	46.4	14,448	94.0	52.4	31	52.5	44.5	22,018	76.2	52.8	40.6
Unknown	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0	0.0	0.3	0.4
Total	17	100.0	100.0	15,366	100.0	100.0	59	100.0	100.0	28,899	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 43B

| Geographic Income Level | \multicolumn{12}{c}{Distribution of 2022 and 2023 Home Mortgage Lending by Income Level of Geography Assessment Area: Fort Worth Metropolitan} | | | | | | | | | | | Owner Occupied Units % |

Geographic Income Level	Bank #	Bank #%	Agg #%	Bank $(000)	Bank $%	Agg $%	Bank #	Bank #%	Agg #%	Bank $(000)	Bank $%	Agg $%	Owner Occupied Units %
**Other Purpose LOC**													
Low	0	0.0	0.5	0	0.0	0.2	0	0.0	1.2	0	0.0	0.8	2.7
Moderate	0	0.0	9.0	0	0.0	6.1	0	0.0	9.9	0	0.0	7.6	20.5
Middle	0	0.0	30.6	0	0.0	20.5	0	0.0	33.3	0	0.0	22.4	35.8
Upper	0	0.0	59.4	0	0.0	72.7	0	0.0	55.3	0	0.0	69.1	40.6
Unknown	0	0.0	0.5	0	0.0	0.4	0	0.0	0.2	0	0.0	0.2	0.4
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
**Other Purpose Closed/Exempt**													
Low	0	0.0	2.2	0	0.0	1.2	0	0.0	2.1	0	0.0	1.8	2.7
Moderate	0	0.0	14.5	0	0.0	8.3	1	50.0	16.2	110	26.8	14.0	20.5
Middle	0	0.0	30.5	0	0.0	17.0	0	0.0	36.4	0	0.0	27.4	35.8
Upper	0	0.0	52.6	0	0.0	73.4	1	50.0	45.0	300	73.2	56.6	40.6
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.3	0	0.0	0.2	0.4
Total	0	0.0	100.0	0	0.0	100.0	2	0.0	100.0	410	0.0	100.0	100.0
**Purpose Not Applicable**													
Low	0	0.0	2.9	0	0.0	13.5	0	0.0	1.8	0	0.0	1.7	2.7
Moderate	0	0.0	27.6	0	0.0	9.3	0	0.0	28.7	0	0.0	23.9	20.5
Middle	0	0.0	40.1	0	0.0	59.4	0	0.0	44.5	0	0.0	42.4	35.8
Upper	0	0.0	29.3	0	0.0	17.6	0	0.0	24.8	0	0.0	31.5	40.6
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.3	0	0.0	0.5	0.4
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	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

Vantage's geographic distribution of small business loans reflects adequate penetration throughout the AA. As noted in Table 44, the bank did not originate any small business loans, among low-income census tracts during the review period. It is notable that low-income census tracts make up 7.8 percent of the total AA tracts and contain 4.3 percent of the total businesses, limiting opportunity and increasing competition for these loans among the 208 institutions reporting CRA-small business loans in 2023.

Among moderate-income census tracts, Vantage's small business lending performance fell slightly below aggregate data and the percentage of businesses located in such tracts AA. Additionally, the volume of the bank's small business loan originations declined since the previous evaluation. Nevertheless, Vantage's volume of lending to small businesses among LMI census tracts reflects adequate performance levels.

Table 44

Geographic Income Level	Bank And Aggregate Loans By Year											Total Businesses %
	2022					2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	3.7	0	0.0	4.1	0	0.0	3.5	0	0.0	3.4	4.3
Moderate	5	20.0	21.3	1,950	21.8	24.2	4	19.0	20.6	1,443	17.7	24.1	22.1
Middle	3	12.0	28.8	933	10.4	24.2	4	19.0	29.1	206	2.5	25.4	30.5
Upper	17	68.0	45.2	6,065	67.8	46.7	13	61.9	45.8	6,505	79.8	46.3	42.5
Unknown	0	0.0	0.5	0	0.0	0.6	0	0.0	0.5	0	0.0	0.7	0.6
Total	25	100.0	100.0	8,948	100.0	100.0	21	100.0	100.0	8,154	100.0	100.0	100.0

Distribution of 2022 and 2023 Small Business Lending by Income Level of Geography
Assessment Area: Fort Worth 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 Businesses of Different Revenue Sizes

The bank's distribution of lending to borrowers reflects an excellent penetration among individuals of different income levels and businesses of revenue different sizes.

The lending distribution to middle- and upper-income borrowers did not affect conclusions about the Vantage's performance considering its lending to LMI borrowers.

Residential Real Estate (HMDA) Lending

HMDA lending by borrower income is adequate when compared to demographic characteristics of the community, as well as the performance of aggregate HMDA lenders with loan originations or purchases in the AA. In 2023, the bank's distribution of home mortgage loans among low-income borrowers significantly exceeded the aggregate data but fell slightly below the percentage of families classified as low-income. Among moderate-income borrowers in 2023, Vantage preformed above aggregate data and slightly below the demographic figure. The bank's distribution of HMDA lending among LMI borrowers increased during the review period, which reflects favorably on the responsiveness of the bank in meeting AA credit needs.

Table 45A

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	2.3	0	0.0	1.1	7	13.2	1.6	897	3.4	0.8	21.2
Moderate	0	0.0	14.1	0	0.0	9.5	8	15.1	14.0	1,135	4.3	9.7	17.6
Middle	1	12.5	24.1	272	6.0	20.8	4	7.5	22.3	797	3.0	19.3	20.2
Upper	7	87.5	39.5	4,274	94.0	50.4	33	62.3	34.6	23,043	87.7	44.9	41.0
Unknown	0	0.0	20.1	0	0.0	18.3	1	1.9	27.5	400	1.5	25.2	0.0
Total	8	100.0	100.0	4,546	100.0	100.0	53	100.0	100.0	26,272	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	8.5	0	0.0	4.5	1	25.0	8.0	140	6.3	4.0	21.2
Moderate	0	0.0	18.5	0	0.0	12.7	1	25.0	18.9	128	5.8	12.1	17.6
Middle	0	0.0	22.6	0	0.0	18.9	0	0.0	20.4	0	0.0	15.8	20.2
Upper	9	100.0	36.6	10,820	100.0	49.5	2	50.0	35.7	1,949	87.9	46.3	41.0
Unknown	0	0.0	13.8	0	0.0	14.4	0	0.0	17.0	0	0.0	21.9	0.0
Total	9	100.0	100.0	10,820	100.0	100.0	4	100.0	100.0	2,217	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.1	0	0.0	4.0	0	0.0	5.3	0	0.0	3.2	21.2
Moderate	0	0.0	11.3	0	0.0	7.4	0	0.0	15.5	0	0.0	10.3	17.6
Middle	0	0.0	19.3	0	0.0	14.2	0	0.0	22.3	0	0.0	16.0	20.2
Upper	0	0.0	60.7	0	0.0	71.6	0	0.0	53.9	0	0.0	65.9	41.0
Unknown	0	0.0	2.6	0	0.0	2.8	0	0.0	2.9	0	0.0	4.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	4.4	0	0.0	2.0	8	13.6	2.8	1,037	3.6	1.2	21.2
Moderate	0	0.0	15.0	0	0.0	10.1	9	15.3	14.6	1,263	4.4	10.0	17.6
Middle	1	5.9	23.0	272	1.8	19.8	5	8.5	22.0	907	3.1	18.8	20.2
Upper	16	94.1	39.3	15,094	98.2	50.4	36	61.0	35.9	25,292	87.5	45.6	41.0
Unknown	0	0.0	18.3	0	0.0	17.7	1	1.7	24.7	400	1.4	24.4	0.0
Total	17	100.0	100.0	15,366	100.0	100.0	59	100.0	100.0	28,899	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 45B

	Bank And Aggregate Loans By Year											Families by Family Income %
Borrower Income Level	**2022**						**2023**						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	6.3	0	0.0	4.0	0	0.0	7.0	0	0.0	4.8	21.2
Moderate	0	0.0	10.4	0	0.0	6.8	0	0.0	12.4	0	0.0	7.5	17.6
Middle	0	0.0	22.8	0	0.0	14.5	0	0.0	25.0	0	0.0	16.8	20.2
Upper	0	0.0	56.1	0	0.0	70.7	0	0.0	53.4	0	0.0	67.5	41.0
Unknown	0	0.0	4.5	0	0.0	4.0	0	0.0	2.3	0	0.0	3.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	7.7	0	0.0	3.3	0	0.0	7.0	0	0.0	3.9	21.2
Moderate	0	0.0	16.1	0	0.0	7.5	0	0.0	17.6	0	0.0	11.9	17.6
Middle	0	0.0	20.2	0	0.0	11.0	1	50.0	23.1	110	26.8	16.0	20.2
Upper	0	0.0	49.1	0	0.0	62.1	1	50.0	43.2	300	73.2	54.3	41.0
Unknown	0	0.0	7.0	0	0.0	16.2	0	0.0	9.2	0	0.0	13.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	410	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	1.2	0	0.0	0.3	0	0.0	0.3	0	0.0	0.1	21.2
Moderate	0	0.0	0.5	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	17.6
Middle	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	20.2
Upper	0	0.0	0.6	0	0.0	0.9	0	0.0	0.0	0	0.0	0.0	41.0
Unknown	0	0.0	97.6	0	0.0	98.3	0	0.0	99.1	0	0.0	99.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

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

Considering the bank's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is excellent. As illustrated in Table 46, Vantage's small business lending to businesses with revenues of $1 million or less in 2022 is significantly above aggregate lenders but below the percentage of small businesses in the AA. While 93.2 percent of AA businesses report annual revenues of $1 million or less, the demographic figure is not presumed to be representative of loan demand. Vantage's distribution of small business loans to businesses reporting revenues of $1 million or less reflects favorably on the bank's responsiveness to the credit needs of businesses in the AA.

The bank's distribution of loans to small businesses with revenues of $1 million or less in 2023 was comparable to aggregate data but below the percentage of small businesses in the AA. Additionally, a significant volume of small business loans extended by Vantage in both 2022 and 2023 was to businesses with unknown revenues. The loans made to businesses with unknown revenues are attributed to a flexible loan product secured by certificates of deposit offered by the bank. Vantage's offering of this flexible product reflects favorably on its responsiveness to the credit needs of businesses in the AA. Despite the high level of competition among financial institutions and increasing interest rates, the bank outperformed aggerate lenders in 2022. Given

this performance consideration, Vantage's distribution of small business loans by revenue size is excellent.

Table 46

	2022						2023						Total Businesses %
Distribution of 2022 and 2023 Small Business Lending by Revenue Size of Businesses Assessment Area: Fort Worth Metropolitan													
Bank And Aggregate Loans By Year													
	Bank	**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**		
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
By Revenue													
$1 Million or Less	17	68.0	48.8	5,938	66.4	33.0	11	52.4	52.5	3,259	40.0	32.0	93.2
Over $1 Million	2	8.0		1,025	11.5		2	9.5		2,000	24.5		5.8
Revenue Unknown	6	24.0		1,985	22.2		8	38.1		2,895	35.5		1.0
Total	25	100.0		8,948	100.0		21	100.0		8,154	100.0		100.0
By Loan Size													
$100,000 or Less	8	32.0	93.8	465	5.2	38.2	8	38.1	94.2	481	5.9	40.2	
$100,001 - $250,000	5	20.0	3.2	950	10.6	15.5	3	14.3	3.1	543	6.7	15.4	
$250,001 - $1 Million	12	48.0	2.9	7,533	84.2	46.3	10	47.6	2.8	7,130	87.4	44.4	
Total	25	100.0	100.0	8,948	100.0	100.0	21	100.0	100.0	8,154	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	5	29.4		355	6.0		6	54.5		366	11.2		
$100,001 - $250,000	4	23.5		800	13.5		1	9.1		243	7.5		
$250,001 - $1 Million	8	47.1		4,783	80.5		4	36.4		2,650	81.3		
Total	17	100.0		5,938	100.0		11	100.0		3,259	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 Lending

Vantage makes an adequate level of CD loans in the AA. As reflected in Table 47, Vantage originated two CD loans in the AA, totaling $7.8 million. The CD loans extended within the AA have a primary purpose of economic development. However, the bank's CD lending since the previous evaluation has significantly decreased by dollar and number volume. The decline in CD lending within the AA is attributed primarily to the cessation of the SBA's PPP. Despite this decrease, the bank was responsive in meeting AA credit needs. An example of the bank's CD lending activity that was considered particularly responsive to the AA credit needs include a $4.2 million dollar loan to finance the construction of a new car wash in a LMI census tract, which will create permanent employment opportunities for LMI individuals.

Table 47

Community Development Lending Assessment Area: Fort Worth Metropolitan		
Purpose	**#**	**$(000)**
Affordable Housing	0	0
Community Services	0	0
Economic Development	2	7,800
Revitalization and Stabilization	0	0
Totals	**2**	**7,800**

INVESTMENT TEST

Vantage's performance under the investment test in the AA is adequate. While the bank is rarely in a leadership position, it has an adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors. Vantage exhibits adequate responsiveness to the CD needs of the AA, although it makes rare use of innovative and/or complex investments to support CD initiatives. During the review period, the bank's investments primarily focused on community services and economic development, which reflects favorably on the Vantage's responsiveness as community contacts emphasized these as CD needs in the AA.

Table 48 illustrates the bank's CD investments and donations within the AA, including prior period investments that remain on the bank's books, current period investments purchased during the review period, and donations made since the previous evaluation. Examples of notable investment and donation activities that reflect Vantage's efforts to meet the CD and credit needs of the AA include:

- A $2.4 million bond to support a school district where 85.2 percent of students are economically disadvantaged.
- A $500,000 municipal bond to finance affordable housing units for LMI individuals and families.

Table 48

Investments, Grants, and Donations Assessment Area: Fort Worth Metropolitan								
Community Development Purpose	**Prior Period Investments**[1]		**Current Investments**[2]		**Donations**		**Total**	
	#	**$(000)**	**#**	**$(000)**	**#**	**$(000)**	**#**	**$(000)**
Affordable Housing	1	532	1	300	0	0	2	832
Community Services	0	0	0	0	5	28	5	28
Economic Development	0	0	0	0	4	30	4	30
Revitalization and Stabilization	1	1,157	1	2,431	0	0	2	3,588
Total	**2**	**1,689**	**2**	**2,731**	**9**	**58**	**13**	**4,478**
[1] Book Value of Investment								
[2] Original Market Value of Investment								

SERVICE TEST

The bank's service test performance is adequate. The conclusion is supported by the type and level of retail and CD services, including accessibility of branches in comparison with the population within LMI geographies, availability of alternative delivery systems, changes in branch locations, and reasonableness of services.

Retail Services

Vantage's delivery systems are reasonably accessible to the geographies and individuals of different income levels in its AA. The distribution of the bank's two branches and two ATMs as of June 30, 2024, was compared to the distribution of the population and businesses among the tract categories within the AA. While the bank does not operate any branches within LMI census tracts, the two branches within the AA are adjacent and accessible to LMI geographies. Table 49 summarizes the bank's retail locations in the AA.

Table 49

Tract Income	% of Geographies	% of Households	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	7.8	6.3	4.3	0	0.0	0	0.0
Moderate	29.0	26.4	22.1	0	0.0	0	0.0
Middle	31.2	35.0	30.5	0	0.0	0	0.0
Upper	31.0	32.2	42.5	2	100.0	2	100.0
Unknown	1.1	.47	0.6	0	0.0	0	0.0
Total	**100.0**	**100.00**	**100.0**	**2**	**100.0**	**2**	**100.0**

Branch and Full-Service ATM Locations
Assessment Area: Fort Worth Metropolitan

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

Since the previous evaluation, Vantage did not open or close any branches in the AA during the review period; therefore, the bank's record of opening or closing branches was not evaluated. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies or to LMI individuals. The level of branch services and hours offered are consistent throughout the AA.

Community Development Services

Vantage provides a limited level of CD services in the AA. The bank's employees provided two CD services since the prior CRA evaluation, serving two organizations for a total of 78 hours. The volume of community services and total hours has increased since the previous evaluation, as in-person interactions with the AA community ramped up since the end of the COVID-19 pandemic. However, the limited number of services provided does not reflect favorably on the bank's CD service performance. The CD services provided include:

- An employee serving on the board of directors for an organization that provides daily meals to LMI individuals in the AA.
- Bank employees partnered with a non-profit organization to provide financial education and resources to LMI students.

Table 50

Purpose	Total Services	Total Hours	Total Organizations
Affordable Housing	0	0	0
Community Services	2	78	2
Economic Development	0	0	0
Revitalization and Stabilization	0	0	0
Total	**2**	**78**	**2**

Community Development Services
Assessment Area: Fort Worth Metropolitan

METROPOLITAN ASSESSMENT AREAS
(Limited-Scope Review)

DESCRIPTION OF OPERATIONS IN LIMITED-SCOPE METROPOLITAN ASSESSMENT AREAS

Brownsville MSA Assessment Area
- As of June 30, 2024, the bank operates a branch in the AA, representing 4.3 percent of Vantage's total branches.
- The AA consists of the entirety of Cameron County, which is coterminous with the Brownsville-Harlingen, TX MSA.
- As of June 30, 2024, Vantage held $61.8 million in deposits in this AA, representing a market share of 1.0 percent and 1.6 percent of the bank's total deposits.
- In 2023, 285 institutions originated or purchased 4,918 HMDA-reportable loans in the AA. The bank ranked 56th, originating eight or 0.2 percent of total loans. Additionally, in 2023, Vantage ranked 41st among 77 institutions originating or purchasing CRA-reportable loans. The bank originated 13 of the 7,262 or 0.2 percent of CRA-reportable loans in the AA.
- According to the ACS, the AA consists of 122 census tracts: three low-, 37 moderate-, 45 middle-, 33 upper-, and four unknown-income tracts.
- The AA total population in 2020 was 421,017, representing 0.7 percent of the state's population.
- The AA includes 98,120 families, of which 1.9 percent are classified as low-, 25.3 percent as moderate-, 40.0 percent as middle-, and 31.9 percent as upper-income.

El Paso Metropolitan Assessment Area
- As of June 30, 2024, the bank operates three branches in the AA, representing 13.0 percent of Vantage's total branches.
- The AA consists of the entirety of El Paso County, which is part of the El Paso, TX MSA. The AA delineation exclude Hudspeth County.
- As of June 30, 2024, Vantage had $528.2 million in deposits in this AA, representing a market share of 4.7 percent and 16.0 percent of the bank's total deposits.
- In 2023, 338 institutions originated or purchased 13,745 HMDA-reportable loans in the AA. The bank ranked 78th, originating seven or 0.1 percent of total loans. Additionally, in 2023, Vantage ranked 24th among 104 institutions originating or purchasing CRA-reportable loans. The bank originated 38 of the 15,356 or 0.2 percent of CRA-reportable loans in the AA.
- According to the ACS, the AA consists of 188 census tracts: ten low-, 59 moderate-, 64 middle-, 54 upper-, and one unknown-income tracts.
- The AA total population in 2020 was 865,657, representing 4.2 percent of the state's population.
- The AA includes 198,164 families, of which 3.2 percent are classified as low-, 27.4 percent as moderate-, 33.1 percent as middle-, and 36.3 percent as upper-income.

Houston Metropolitan Assessment Area
- As of June 30, 2024, the bank operates a branch in the AA, representing 4.3 percent of Vantage's total branches.
- The AA consists of the entirety of Harris County, which is part of the Houston-The Woodlands-Sugar Land, TX MSA. The AA delineation excludes the other eight counties in the MSA.

- As of June 30, 2024, Vantage had $130.4 million in deposits in this AA, representing a market share of 0.1 percent and 3.5 percent of the bank's total deposits.
- In 2023, 826 institutions originated or purchased 72,835 HMDA-reportable loans in the AA. The bank ranked 163rd, originating 29 or 0.04 percent of total loans. Additionally, in 2023, Vantage ranked 84th among 251 institutions originating or purchasing CRA-reportable loans. The bank originated 18 of the 142,821 or 0.01 percent of CRA-reportable loans in the AA.
- According to the ACS, the AA consists of 1,115 census tracts: 202 low-, 313 moderate-, 272 middle-, 290 upper-, and 38 unknown-income tracts.
- The AA total population in 2020 was 4,731,145, representing 8.6 percent of the state's population.
- The AA includes 1,113,437 families, of which 14.3 percent are classified as low-, 26.9 percent as moderate-, 28.3 percent as middle-, and 29.0 percent as upper-income.

Laredo MSA Assessment Area
- As of June 30, 2024, the bank operated two branches in the AA, representing 8.7 percent of Vantage's total branches.
- The AA consists of the entirety of Webb County, which is coterminous with the Laredo, TX MSA.
- As of June 30, 2024, Vantage had $173.6 million in deposits in this AA, representing a market share of 2.2 percent and 4.8 percent of the bank's total deposits.
- In 2023, 157 institutions originated or purchased 2,961 HMDA-reportable loans in the Laredo MSA AA. The bank ranked 37th, originating six or 0.2 percent of total loans. Additionally, in 2023, Vantage ranked 25th among 79 institutions originating or purchasing CRA-reportable loans. The bank originated 29 of the 7,150 or 0.4 percent of CRA-reportable loans in the AA.
- According to the ACS, the AA consists of 69 census tracts: three low-, 31 moderate-, 13 middle-, 20 upper-, and two unknown-income tracts.
- The AA total population in 2020 was 267,114, representing 1.5 percent of the state's population.
- The AA includes 61,334 families, of which 3.3 percent are classified as low-, 38.5 percent as moderate-, 16.8 percent as middle-, and 41.4 percent as upper-income.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Appendix C contains detailed performance and demographic information reviewed for the metropolitan AAs receiving a limited-scope review. Table 49 discusses conclusions regarding the bank's performance.

Table 51

Assessment Area	Lending Test	Investment Test	Service Test
Brownsville MSA	Consistent	Below	Below
El Paso Metropolitan	Consistent	Consistent	Consistent
Houston Metropolitan	Consistent	Consistent	Consistent
Laredo MSA	Consistent	Below	Consistent

Vantage's lending, investment, and service performance in the AAs is generally consistent with the institution's overall performance. The bank's investment and service test performance in the Brownsville MSA AA and the investment performance in the Laredo MSA AA fell below Vantage's overall performance; however, it does not impact the assessed overall rating.

NONMETROPOLITAN ASSESSMENT AREA
(Limited-Scope Review)

DESCRIPTION OF OPERATIONS IN LIMITED-SCOPE NONMETROPOLITAN ASSESSMENT AREA

Refugio Nonmetropolitan Assessment Area
- As of June 30, 2024, the bank operated a branch in the AA, representing 4.3 percent of Vantage's total branches.
- The AA consists of the entirety of Refugio County.
- As of June 30, 2024, Vantage had $58.9 million in deposits in this AA, representing a market share of 49.9 percent and 1.6 percent of the bank's total deposits.
- During the review period, Vantage did not originate any HMDA-reportable loans. However, in 2023, 46 institutions originated or purchased 83 HMDA-reportable loans in the AA. Additionally, in 2023, the bank ranked sixth among 28 institutions originating or purchasing CRA-reportable loans. Vantage originated four of the 113 or 3.5 percent of CRA-reportable loans in the AA.
- According to the ACS, the AA consists of only two middle-income census tracts.
- The AA total population in 2020 was 6,741, representing 7.4 percent of the state's population.
- The AA includes 1,730 families, of which 100 percent are classified as middle-income.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Additional information regarding detailed demographic information and the HMDA and CRA lending for the AA can be found in Appendix D. Table 52 discusses conclusions regarding the bank's performance.

Table 52

Assessment Area	Lending Test	Investment Test	Service Test
Refugio Nonmetropolitan	Consistent	Below	Below

Vantage's lending performance in the AA is consistent with the bank's overall lending performance. The bank's investment and service performance in the AA fell below Vantage's overall performance; however, it does not impact the assessed overall rating.

APPENDIX A – MAPS OF THE ASSESSMENT AREAS

McAllen MSA Assessment Area
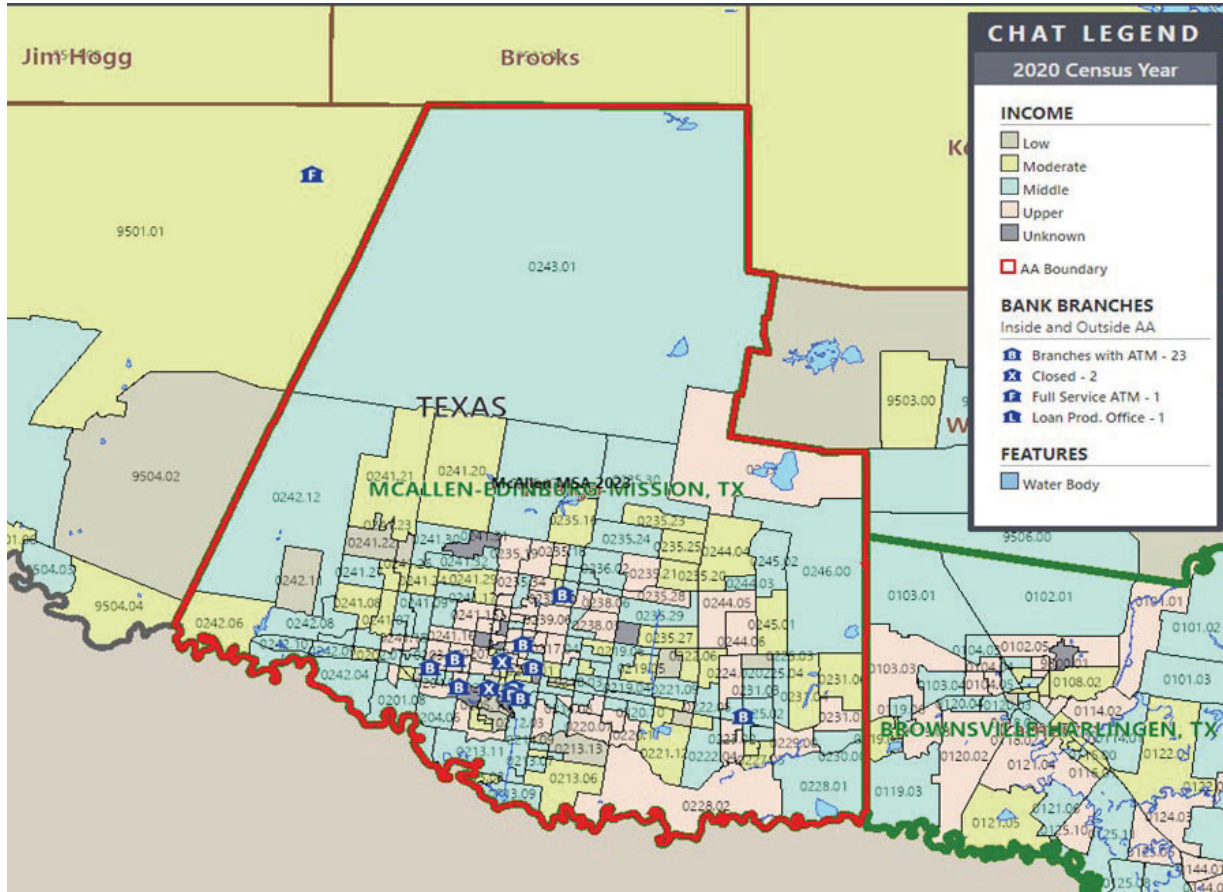
San Antonio Metropolitan Assessment Area
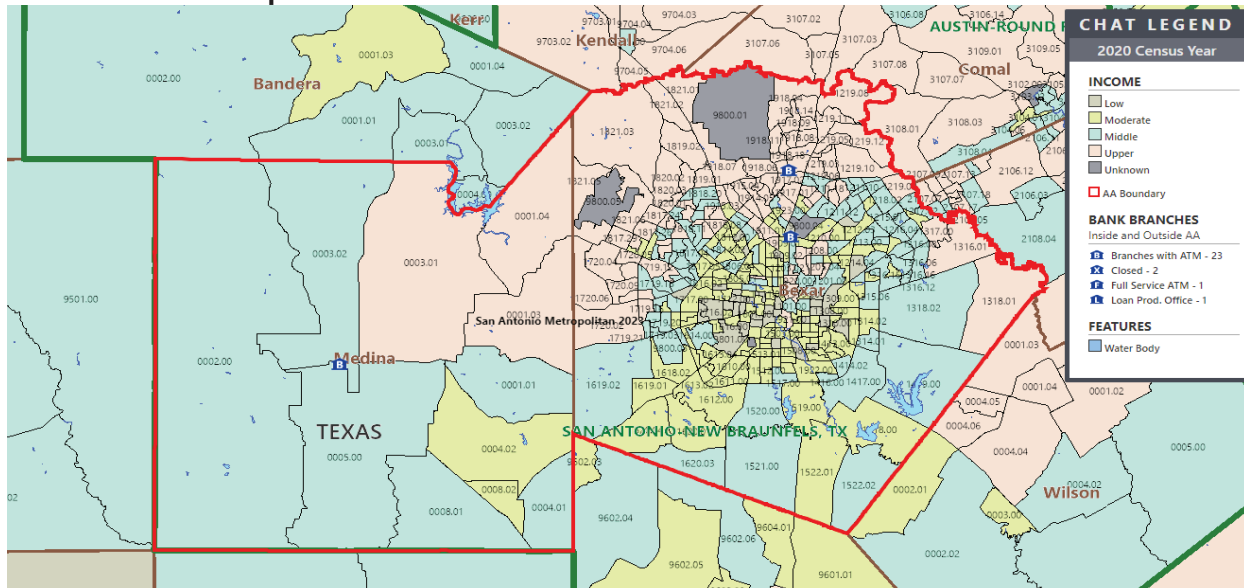
Fort Worth Metropolitan Assessment Area

Brownsville MSA Assessment Area

El Paso Metropolitan Assessment Area
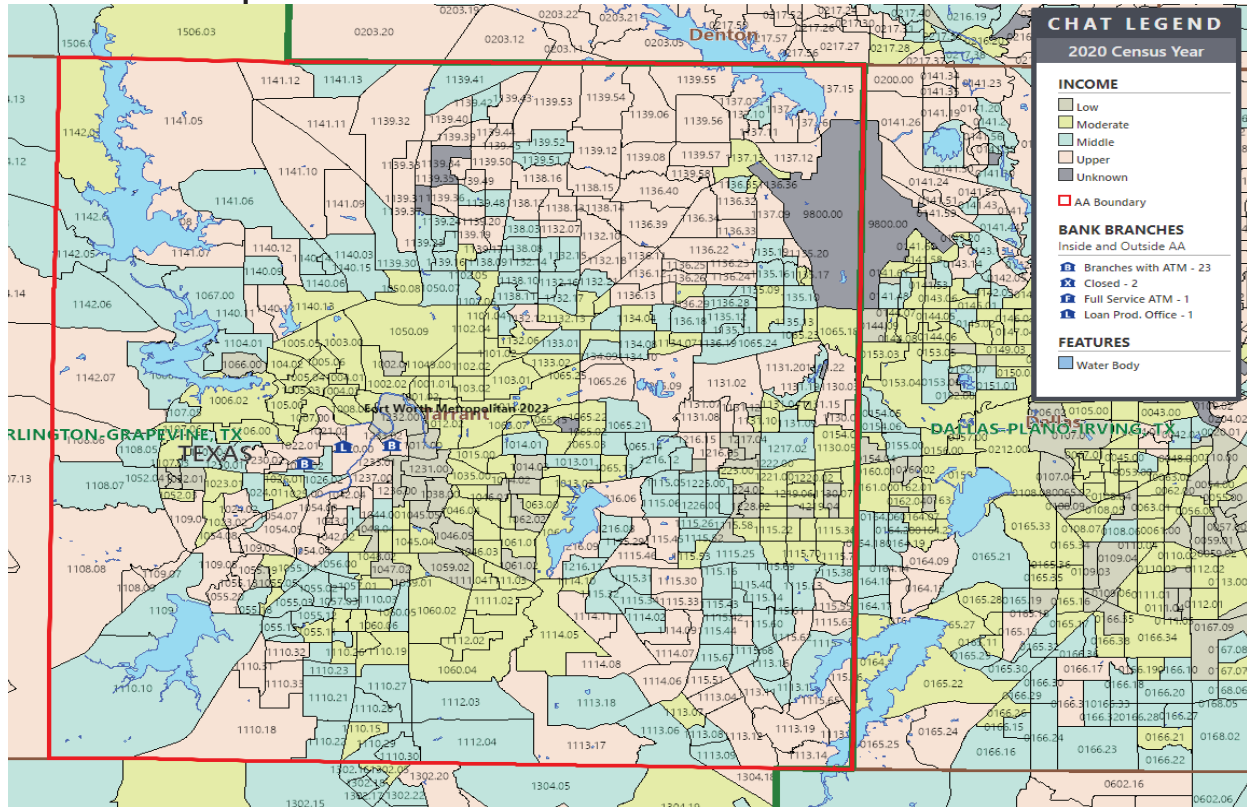
Houston Metropolitan Assessment Area
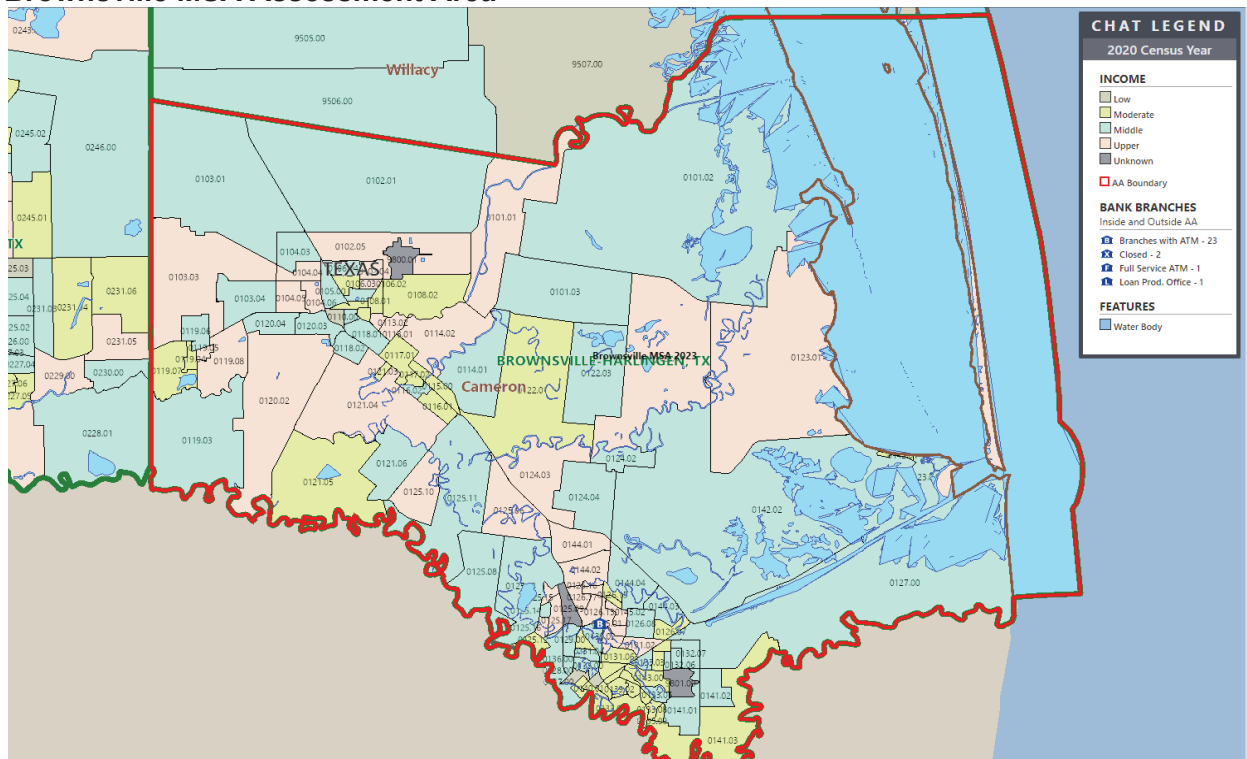
Laredo MSA Assessment Area
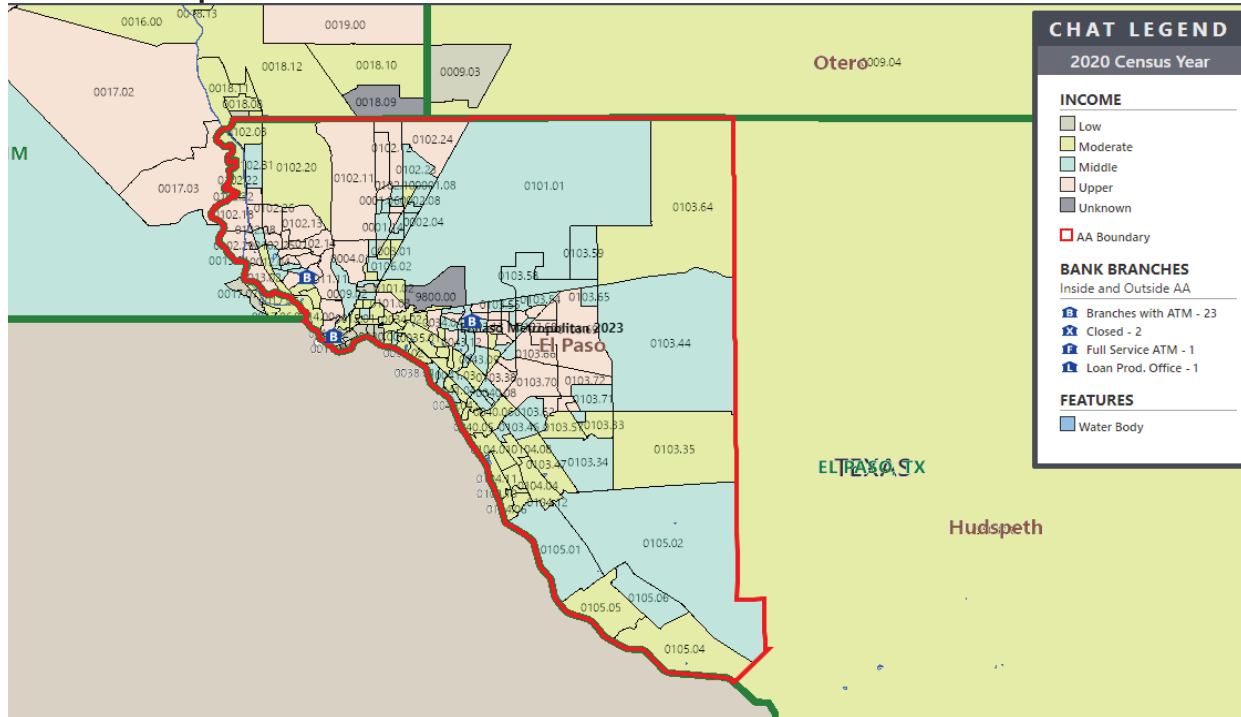
Refugio Nonmetropolitan Assessment Area
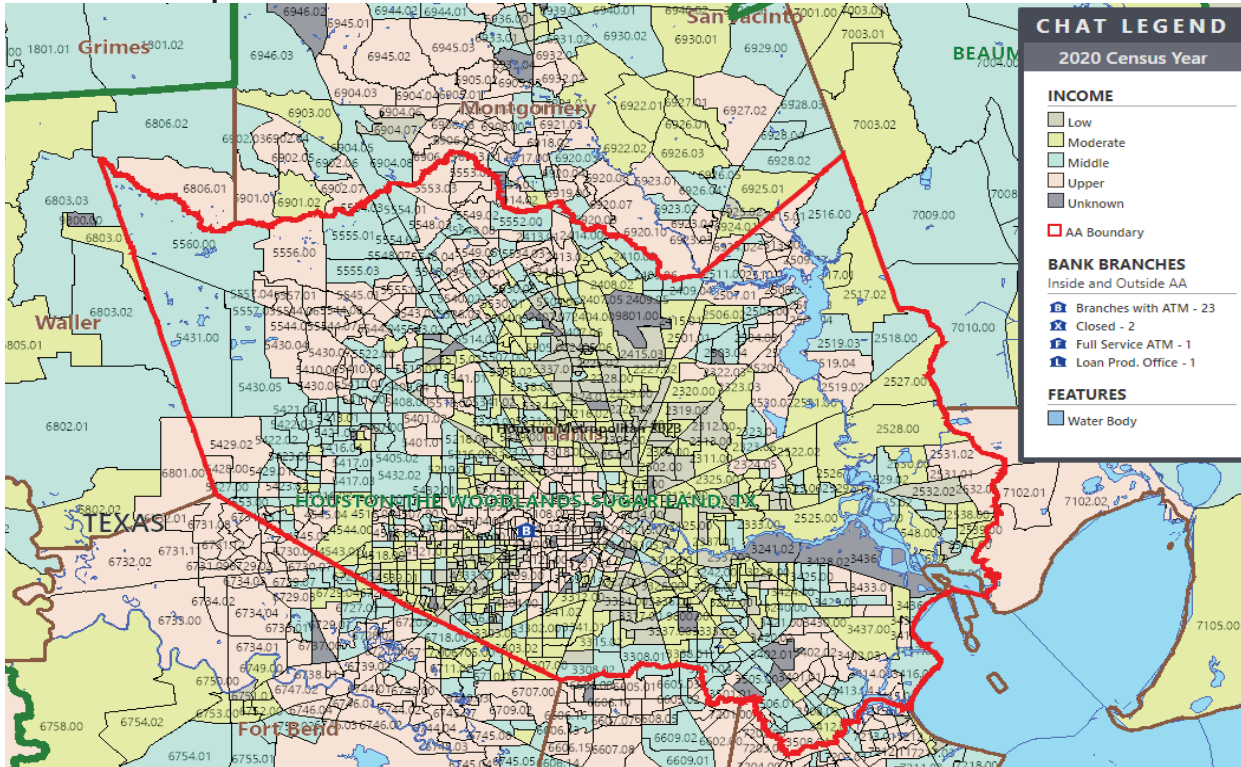
APPENDIX B – FULL-SCOPE ASSESSMENT AREAS DEMOGRAPHIC INFORMATION

Table B-1

2022 McAllen MSA AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	13	6.1	10,756	5.5	5,801	53.9	50,999	26.1
Moderate	47	22.2	38,833	19.8	14,091	36.3	29,827	15.2
Middle	80	37.7	78,619	40.2	19,196	24.4	31,732	16.2
Upper	63	29.7	62,820	32.1	9,451	15.0	83,129	42.5
Unknown	9	4.2	4,659	2.4	1,275	27.4	0	0.0
Total AA	**212**	**100.0**	**195,687**	**100.0**	**49,814**	**25.5**	**195,687**	**100.0**

	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	14,129	8,476	5.1	60.0	4,449	31.5	1,204	8.5
Moderate	56,747	31,448	19.0	55.4	17,783	31.3	7,516	13.2
Middle	115,103	67,372	40.6	58.5	29,733	25.8	17,998	15.6
Upper	89,026	54,784	33.0	61.5	24,009	27.0	10,233	11.5
Unknown	6,375	3,713	2.2	58.2	2,111	33.1	551	8.6
Total AA	**281,380**	**165,793**	**100.0**	**58.9**	**78,085**	**27.8**	**37,502**	**13.3**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	882	3.2	824	3.1	48	3.2	10	4.5
Moderate	4,322	15.5	4,023	15.4	271	18.1	28	12.6
Middle	10,405	37.3	9,717	37.1	590	39.4	98	44.1
Upper	11,327	40.6	10,709	40.9	539	36.0	79	35.6
Unknown	953	3.4	895	3.4	51	3.4	7	3.2
Total AA	**27,889**	**100.0**	**26,168**	**100.0**	**1,499**	**100.0**	**222**	**100.0**
Percentage of Total Businesses:			**93.8**		**5.4**		**0.8**	

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	4	1.2	4	1.3	0	0.0	0	0.0
Moderate	65	19.1	56	17.7	9	36.0	0	0.0
Middle	132	38.7	123	38.9	9	36.0	0	0.0
Upper	134	39.3	127	40.2	7	28.0	0	0.0
Unknown	6	1.8	6	1.9	0	0.0	0	0.0
Total AA	**341**	**100.0**	**316**	**100.0**	**25**	**100.0**	**0**	**0.0**
Percentage of Total Farms:			**92.7**		**7.3**		**0.0**	

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table B-2

2022 San Antonio Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	35	9.1	28,772	6.6	9,445	32.8	103,232	23.8
Moderate	139	36.0	142,249	32.8	25,872	18.2	76,976	17.8
Middle	108	28.0	129,285	29.8	10,930	8.5	84,994	19.6
Upper	100	25.9	132,988	30.7	4,882	3.7	168,092	38.8
Unknown	4	1.0	0	0.0	0	0.0	0	0.0
Total AA	386	100.0	433,294	100.0	51,129	11.8	433,294	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	52,666	18,604	4.8	35.3	28,356	53.8	5,706	10.8
Moderate	252,435	114,388	29.3	45.3	114,937	45.5	23,110	9.2
Middle	208,930	122,851	31.5	58.8	71,912	34.4	14,167	6.8
Upper	204,318	133,992	34.4	65.6	55,499	27.2	14,827	7.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	718,349	389,835	100.0	54.3	270,704	37.7	57,810	8.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	5,350	6.2	4,736	5.9	572	11.2	42	4.8
Moderate	23,498	27.3	21,701	27.1	1,651	32.3	146	16.6
Middle	22,515	26.1	21,090	26.3	1,229	24.0	196	22.2
Upper	34,604	40.2	32,486	40.5	1,624	31.7	494	56.1
Unknown	181	0.2	136	0.2	42	0.8	3	0.3
Total AA	86,148	100.0	80,149	100.0	5,118	100.0	881	100.0
Percentage of Total Businesses:			93.0		5.9			1.0
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = $1 Million		Over $1 Million		Revenue Not Reported		
	#	%	#	%	#	%	#	%
Low	13	1.4	13	1.4	0	0.0	0	0.0
Moderate	164	17.7	162	17.8	2	14.3	0	0.0
Middle	282	30.5	274	30.1	8	57.1	0	0.0
Upper	465	50.3	461	50.7	4	28.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	924	100.0	910	100.0	14	100.0	0	0.0
Percentage of Total Farms:			98.5		1.5			0.0

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table B-3

2022 Fort Worth Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	35	7.8	27,035	5.4	8,129	30.1	106,209	21.2
Moderate	130	29.0	125,780	25.1	18,427	14.7	88,143	17.6
Middle	140	31.2	172,590	34.4	11,117	6.4	101,401	20.2
Upper	139	31.0	173,348	34.6	4,447	2.6	205,236	41.0
Unknown	5	1.1	2,236	0.4	157	7.0	0	0.0
Total AA	449	100.0	500,989	100.0	42,277	8.4	500,989	100.0

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	53,340	11,895	2.7	22.3	33,862	63.5	7,583	14.2
Moderate	209,902	89,120	20.5	42.5	101,816	48.5	18,966	9.0
Middle	265,807	155,834	35.8	58.6	94,038	35.4	15,935	6.0
Upper	247,088	176,933	40.6	71.6	55,534	22.5	14,621	5.9
Unknown	4,244	1,761	0.4	41.5	1,653	38.9	830	19.6
Total AA	780,381	435,543	100.0	55.8	286,903	36.8	57,935	7.4

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4,657	4.3	4,289	4.2	336	5.4	32	2.6
Moderate	24,002	22.1	21,825	21.5	1,969	31.8	208	17.2
Middle	32,810	30.2	31,176	30.7	1,354	21.8	280	23.1
Upper	46,679	42.9	43,517	42.9	2,475	39.9	687	56.7
Unknown	656	0.6	585	0.6	66	1.1	5	0.4
Total AA	108,804	100.0	101,392	100.0	6,200	100.0	1,212	100.0
Percentage of Total Businesses:			93.2		5.7		1.1	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	11	1.5	10	1.4	1	8.3	0	0.0
Moderate	96	13.3	95	13.4	1	8.3	0	0.0
Middle	198	27.4	197	27.7	1	8.3	0	0.0
Upper	412	57.0	403	56.7	9	75.0	0	0.0
Unknown	6	0.8	6	0.8	0	0.0	0	0.0
Total AA	723	100.0	711	100.0	12	100.0	0	0.0
Percentage of Total Farms:			98.3		1.7		0.0	

Source: 2022 FFIEC Census Data
　　　　2022 Dun & Bradstreet Data
　　　　2016-2020 U.S. Census Bureau: American Community Survey
Note:　Percentages may not total 100.0 percent due to rounding.

APPENDIX C – METROPOLITAN LIMITED SCOPE ASSESSMENT AREA

Table C-1

2023 Brownsville MSA AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	3	2.5	1,911	1.9	956	50.0	23,835	24.3
Moderate	37	30.3	24,842	25.3	8,677	34.9	16,770	17.1
Middle	45	36.9	39,280	40.0	9,109	23.2	16,686	17.0
Upper	33	27.0	31,314	31.9	4,050	12.9	40,829	41.6
Unknown	4	3.3	773	0.8	352	45.5	0	0.0
Total AA	**122**	**100.0**	**98,120**	**100.0**	**23,144**	**23.6**	**98,120**	**100.0**

	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,035	1,025	1.2	33.8	1,600	52.7	410	13.5
Moderate	36,867	17,071	20.3	46.3	15,159	41.1	4,637	12.6
Middle	59,284	34,861	41.5	58.8	16,248	27.4	8,175	13.8
Upper	52,390	30,542	36.3	58.3	9,568	18.3	12,280	23.4
Unknown	968	555	0.7	57.3	339	35.0	74	7.6
Total AA	**152,544**	**84,054**	**100.0**	**55.1**	**42,914**	**28.1**	**25,576**	**16.8**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	347	3.0	332	3.0	13	1.8	2	1.8
Moderate	3,366	28.7	3,097	28.4	245	33.7	24	21.1
Middle	4,066	34.6	3,769	34.6	257	35.3	40	35.1
Upper	3,844	32.7	3,591	32.9	206	28.3	47	41.2
Unknown	124	1.1	116	1.1	7	1.0	1	0.9
Total AA	**11,747**	**100.0**	**10,905**	**100.0**	**728**	**100.0**	**114**	**100.0**
Percentage of Total Businesses:			**92.8**		**6.2**		**1.0**	

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	2	1.1	2	1.1	0	0.0	0	0.0
Moderate	23	12.5	21	11.9	1	16.7	1	100.0
Middle	73	39.7	72	40.7	1	16.7	0	0.0
Upper	84	45.7	80	45.2	4	66.7	0	0.0
Unknown	2	1.1	2	1.1	0	0.0	0	0.0
Total AA	**184**	**100.0**	**177**	**100.0**	**6**	**100.0**	**1**	**100.0**
Percentage of Total Farms:			**96.2**		**3.3**		**0.5**	

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

Table C-2

2022 Brownsville MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	2.5	1,911	1.9	956	50.0	23,835	24.3
Moderate	37	30.3	24,842	25.3	8,677	34.9	16,770	17.1
Middle	45	36.9	39,280	40.0	9,109	23.2	16,686	17.0
Upper	33	27.0	31,314	31.9	4,050	12.9	40,829	41.6
Unknown	4	3.3	773	0.8	352	45.5	0	0.0
Total AA	122	100.0	98,120	100.0	23,144	23.6	98,120	100.0

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,035	1,025	1.2	33.8	1,600	52.7	410	13.5
Moderate	36,867	17,071	20.3	46.3	15,159	41.1	4,637	12.6
Middle	59,284	34,861	41.5	58.8	16,248	27.4	8,175	13.8
Upper	52,390	30,542	36.3	58.3	9,568	18.3	12,280	23.4
Unknown	968	555	0.7	57.3	339	35.0	74	7.6
Total AA	152,544	84,054	100.0	55.1	42,914	28.1	25,576	16.8

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	360	2.9	344	3.0	14	1.9	2	1.6
Moderate	3,457	28.3	3,184	28.0	246	33.5	27	21.3
Middle	4,206	34.4	3,906	34.4	257	35.0	43	33.9
Upper	4,070	33.3	3,806	33.5	210	28.6	54	42.5
Unknown	139	1.1	131	1.2	7	1.0	1	0.8
Total AA	12,232	100.0	11,371	100.0	734	100.0	127	100.0
Percentage of Total Businesses:			93.0		6.0		1.0	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2	1.1	2	1.1	0	0.0	0	0.0
Moderate	22	12.0	20	11.3	1	16.7	1	100.0
Middle	72	39.1	71	40.1	1	16.7	0	0.0
Upper	86	46.7	82	46.3	4	66.7	0	0.0
Unknown	2	1.1	2	1.1	0	0.0	0	0.0
Total AA	184	100.0	177	100.0	6	100.0	1	100.0
Percentage of Total Farms:			96.2		3.3		0.5	

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-3A

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Brownsville MSA												
Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %
	2022						2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans												
Low	0	0.0	0.7	0	0.0	0.4	0	0.0	0.3	0	0.0	0.3	1.2
Moderate	1	14.3	13.3	303	11.6	10.3	0	0.0	14.6	0	0.0	10.5	20.3
Middle	1	14.3	35.9	464	17.7	34.5	2	33.3	39.8	685	32.6	37.8	41.5
Upper	5	71.4	49.7	1,856	70.8	54.4	4	66.7	44.8	1,418	67.4	51.1	36.3
Unknown	0	0.0	0.4	0	0.0	0.3	0	0.0	0.5	0	0.0	0.3	0.7
Total	7	100.0	100.0	2,623	100.0	100.0	6	100.0	100.0	2,103	100.0	100.0	100.0
Refinance Loans												
Low	0	0.0	0.6	0	0.0	0.6	0	0.0	0.7	0	0.0	0.3	1.2
Moderate	0	0.0	10.9	0	0.0	7.7	0	0.0	10.8	0	0.0	18.8	20.3
Middle	0	0.0	35.0	0	0.0	33.6	0	0.0	43.8	0	0.0	40.3	41.5
Upper	0	0.0	53.0	0	0.0	57.7	1	100.0	44.1	120	100.0	40.2	36.3
Unknown	0	0.0	0.4	0	0.0	0.5	0	0.0	0.6	0	0.0	0.3	0.7
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	120	100.0	100.0	100.0
Home Improvement Loans												
Low	0	0.0	1.2	0	0.0	1.4	0	0.0	0.0	0	0.0	0.0	1.2
Moderate	0	0.0	8.6	0	0.0	4.5	0	0.0	9.5	0	0.0	8.6	20.3
Middle	0	0.0	48.1	0	0.0	56.5	0	0.0	44.0	0	0.0	39.1	41.5
Upper	0	0.0	42.0	0	0.0	37.6	0	0.0	46.4	0	0.0	52.2	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.7
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans												Multi-family Units %
Low	0	0.0	8.5	0	0.0	1.6	0	0.0	0.0	0	0.0	0.0	2.0
Moderate	1	100.0	21.3	290	100.0	22.4	0	0.0	32.7	0	0.0	41.0	30.1
Middle	0	0.0	46.8	0	0.0	31.7	0	0.0	44.9	0	0.0	38.2	24.6
Upper	0	0.0	21.3	0	0.0	36.4	0	0.0	20.4	0	0.0	20.2	42.8
Unknown	0	0.0	2.1	0	0.0	7.9	0	0.0	2.0	0	0.0	0.6	0.6
Total	1	100.0	100.0	290	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans												Owner Occupied Units %
Low	0	0.0	0.8	0	0.0	0.5	0	0.0	0.4	0	0.0	0.3	1.2
Moderate	2	25.0	12.6	593	20.4	10.9	0	0.0	14.1	0	0.0	14.1	20.3
Middle	1	12.5	35.9	464	15.9	34.2	2	25.0	40.3	685	29.8	38.2	41.5
Upper	5	62.5	50.3	1,856	63.7	53.4	6	75.0	44.7	1,616	70.2	47.0	36.3
Unknown	0	0.0	0.4	0	0.0	1.1	0	0.0	0.5	0	0.0	0.3	0.7
Total	8	100.0	100.0	2,913	100.0	100.0	8	100.0	100.0	2,301	100.0	100.0	100.0

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

Table C-3B

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.2
Moderate	0	0.0	4.9	0	0.0	2.5	0	0.0	2.7	0	0.0	2.9	20.3
Middle	0	0.0	22.0	0	0.0	25.4	0	0.0	31.5	0	0.0	31.2	41.5
Upper	0	0.0	70.7	0	0.0	67.2	0	0.0	65.8	0	0.0	65.9	36.3
Unknown	0	0.0	2.4	0	0.0	4.9	0	0.0	0.0	0	0.0	0.0	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	0.7	0	0.0	0.3	0	0.0	0.7	0	0.0	0.4	1.2
Moderate	0	0.0	11.8	0	0.0	9.2	0	0.0	15.5	0	0.0	10.9	20.3
Middle	0	0.0	35.3	0	0.0	28.9	0	0.0	38.5	0	0.0	41.2	41.5
Upper	0	0.0	52.2	0	0.0	61.6	1	100.0	45.3	78	100.0	47.5	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	78	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.9	0	0.0	0.1	0	0.0	1.2	0	0.0	0.6	1.2
Moderate	0	0.0	15.7	0	0.0	10.3	0	0.0	23.5	0	0.0	15.1	20.3
Middle	0	0.0	37.4	0	0.0	38.8	0	0.0	37.0	0	0.0	43.0	41.5
Upper	0	0.0	46.1	0	0.0	50.7	0	0.0	37.0	0	0.0	40.4	36.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	1.2	0	0.0	1.0	0.7
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

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

TABLE C-4

Geographic Income Level	Bank And Aggregate Loans By Year											Total Businesses %
	2022						2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	1.8	0	0.0	1.2	0	0.0	1.7	0	0.0	2.1	3.0
Moderate	3	37.5	25.4	957	28.4	26.3	2	15.4	25.5	563	13.9	25.5	28.7
Middle	2	25.0	36.2	1,400	41.6	33.5	4	30.8	35.9	1,670	41.2	35.7	34.6
Upper	3	37.5	35.2	1,010	30.0	37.0	5	38.5	35.5	1,269	31.3	35.6	32.7
Unknown	0	0.0	0.9	0	0.0	1.9	2	15.4	0.9	549	13.6	1.0	1.1
Total	8	100.0	100.0	3,367	100.0	100.0	13	100.0	100.0	4,051	100.0	100.0	100.0

Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography
Assessment Area: Brownsville MSA

Source: 2023 FFIEC Census Data

    2023 Dun & Bradstreet Data

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

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

Table C-5A

Borrower Income Level	Bank And Aggregate Loans By Year											Families by Family Income %
	2022						2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level — Assessment Area: Brownsville MSA

Borrower Income Level	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	Families by Family Income %
Home Purchase Loans													
Low	0	0.0	0.6	0	0.0	0.2	0	0.0	0.7	0	0.0	0.3	24.3
Moderate	0	0.0	6.3	0	0.0	3.3	0	0.0	5.2	0	0.0	2.8	17.1
Middle	0	0.0	17.1	0	0.0	12.5	1	16.7	17.2	134	6.4	13.0	17.0
Upper	5	71.4	55.7	1,469	56.0	62.3	4	66.7	45.6	1,469	69.9	53.0	41.6
Unknown	2	28.6	20.3	1,154	44.0	21.6	1	16.7	31.3	500	23.8	31.0	0.0
Total	7	100.0	100.0	2,623	100.0	100.0	6	100.0	100.0	2,103	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	2.1	0	0.0	1.0	0	0.0	3.1	0	0.0	0.9	24.3
Moderate	0	0.0	7.3	0	0.0	4.6	0	0.0	8.2	0	0.0	3.7	17.1
Middle	0	0.0	16.4	0	0.0	12.0	0	0.0	17.1	0	0.0	9.0	17.0
Upper	0	0.0	57.0	0	0.0	63.3	1	100.0	50.1	120	100.0	47.3	41.6
Unknown	0	0.0	17.2	0	0.0	19.1	0	0.0	21.6	0	0.0	39.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	120	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	1.2	0	0.0	0.7	0	0.0	3.6	0	0.0	1.4	24.3
Moderate	0	0.0	9.9	0	0.0	5.8	0	0.0	11.9	0	0.0	6.8	17.1
Middle	0	0.0	23.5	0	0.0	17.8	0	0.0	17.9	0	0.0	17.2	17.0
Upper	0	0.0	63.0	0	0.0	73.1	0	0.0	60.7	0	0.0	64.7	41.6
Unknown	0	0.0	2.5	0	0.0	2.6	0	0.0	6.0	0	0.0	9.9	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	1.2	0	0.0	0.5	0	0.0	1.3	0	0.0	0.5	24.3
Moderate	0	0.0	6.7	0	0.0	3.6	0	0.0	6.2	0	0.0	3.2	17.1
Middle	0	0.0	16.8	0	0.0	12.4	1	12.5	17.2	134	5.8	12.4	17.0
Upper	5	71.4	55.3	1,469	56.0	62.2	6	75.0	46.3	1,667	72.4	52.1	41.6
Unknown	2	28.6	20.0	1,154	44.0	21.3	1	12.5	29.0	500	21.7	31.9	0.0
Total	7	100.0	100.0	2,623	100.0	100.0	8	100.0	100.0	2,301	100.0	100.0	100.0

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

Table C-5B

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level											
Assessment Area: Brownsville MSA											

Borrower Income Level	Bank And Aggregate Loans By Year											Families by Family Income %
	2022						2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC												
Low	0	0.0	2.4	0	0.0	2.3	0	0.0	2.7	0	0.0	4.7	24.3
Moderate	0	0.0	7.3	0	0.0	4.1	0	0.0	13.7	0	0.0	11.8	17.1
Middle	0	0.0	29.3	0	0.0	22.2	0	0.0	26.0	0	0.0	20.3	17.0
Upper	0	0.0	58.5	0	0.0	67.9	0	0.0	57.5	0	0.0	63.2	41.6
Unknown	0	0.0	2.4	0	0.0	3.5	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt												
Low	0	0.0	2.9	0	0.0	1.8	0	0.0	2.7	0	0.0	1.6	24.3
Moderate	0	0.0	8.1	0	0.0	4.3	0	0.0	14.2	0	0.0	11.4	17.1
Middle	0	0.0	15.4	0	0.0	12.4	0	0.0	22.3	0	0.0	16.7	17.0
Upper	0	0.0	66.9	0	0.0	70.6	1	100.0	57.4	78	100.0	65.5	41.6
Unknown	0	0.0	6.6	0	0.0	11.0	0	0.0	3.4	0	0.0	4.8	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	78	100.0	100.0	100.0
Purpose Not Applicable												
Low	0	0.0	8.7	0	0.0	3.7	0	0.0	9.9	0	0.0	3.4	24.3
Moderate	0	0.0	6.1	0	0.0	3.1	0	0.0	4.9	0	0.0	6.8	17.1
Middle	0	0.0	3.5	0	0.0	2.2	0	0.0	0.0	0	0.0	0.0	17.0
Upper	0	0.0	1.7	0	0.0	2.7	0	0.0	1.2	0	0.0	4.1	41.6
Unknown	0	0.0	80.0	0	0.0	88.3	0	0.0	84.0	0	0.0	85.6	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Source: 2023 FFIEC Census Data												
2016-2020 U.S. Census Bureau: American Community Survey												
Note: Percentages may not total 100.0 percent due to rounding.												

Table C-6

	Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses Assessment Area: Brownsville MSA												Total Businesses %
	Bank And Aggregate Loans By Year												
	2022						**2023**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
By Revenue													
$1 Million or Less	4	50.0	49.4	1,487	44.2	36.0	5	38.5	54.5	2,034	50.2	40.4	92.8
Over $1 Million	1	12.5		180	5.3		0	0.0		0	0.0		6.2
Revenue Unknown	3	37.5		1,700	50.5		8	61.5		2,017	49.8		1.0
Total	8	100.0		3,367	100.0		13	100.0		4,051	100.0		100.0
By Loan Size													
$100,000 or Less	1	12.5	93.0	100	3.0	39.5	5	38.5	92.7	355	8.8	38.7	
$100,001 - $250,000	1	12.5	4.4	180	5.3	20.6	2	15.4	4.2	408	10.1	18.7	
$250,001 - $1 Million	6	75.0	2.7	3,087	91.7	39.9	6	46.2	3.1	3,288	81.2	42.6	
Total	8	100.0	100.0	3,367	100.0	100.0	13	100.0	100.0	4,051	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	25.0		100	6.7		2	40.0		145	7.1		
$100,001 - $250,000	0	0.0		0	0.0		0	0.0		0	0.0		
$250,001 - $1 Million	3	75.0		1,387	93.3		3	60.0		1,889	92.9		
Total	4	100.0		1,487	100.0		5	100.0		2,034	100.0		

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

Table C-7

2023 El Paso Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	10	5.3	6,255	3.2	3,020	48.3	43,438	21.9
Moderate	59	31.4	54,376	27.4	14,336	26.4	35,369	17.8
Middle	64	34.0	65,514	33.1	10,592	16.2	36,688	18.5
Upper	54	28.7	72,019	36.3	5,578	7.7	82,669	41.7
Unknown	1	0.5	0	0.0	0	0.0	0	0.0
Total AA	188	100.0	198,164	100.0	33,526	16.9	198,164	100.0

	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	13,814	2,299	1.3	16.6	9,097	65.9	2,418	17.5
Moderate	87,455	43,059	25.3	49.2	35,951	41.1	8,445	9.7
Middle	95,235	54,472	32.0	57.2	33,652	35.3	7,111	7.5
Upper	102,563	70,603	41.4	68.8	24,529	23.9	7,431	7.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	299,067	170,433	100.0	57.0	103,229	34.5	25,405	8.5

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,371	5.0	1,201	4.7	162	8.9	8	4.7
Moderate	9,325	34.1	8,417	33.2	844	46.4	64	37.2
Middle	7,147	26.1	6,695	26.4	421	23.1	31	18.0
Upper	9,359	34.2	8,936	35.3	357	19.6	66	38.4
Unknown	131	0.5	92	0.4	36	2.0	3	1.7
Total AA	27,333	100.0	25,341	100.0	1,820	100.0	172	100.0
Percentage of Total Businesses:			92.7		6.7		0.6	

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	4	2.8	4	2.9	0	0.0	0	0.0
Moderate	54	37.5	51	37.0	3	50.0	0	0.0
Middle	37	25.7	35	25.4	2	33.3	0	0.0
Upper	48	33.3	48	34.8	0	0.0	0	0.0
Unknown	1	0.7	0	0.0	1	16.7	0	0.0
Total AA	144	100.0	138	100.0	6	100.0	0	0.0
Percentage of Total Farms:			95.8		4.2		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.

Table C-8

2022 El Paso Metropolitan AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	10	5.3	6,255	3.2	3,020	48.3	43,438	21.9
Moderate	59	31.4	54,376	27.4	14,336	26.4	35,369	17.8
Middle	64	34.0	65,514	33.1	10,592	16.2	36,688	18.5
Upper	54	28.7	72,019	36.3	5,578	7.7	82,669	41.7
Unknown	1	0.5	0	0.0	0	0.0	0	0.0
Total AA	188	100.0	198,164	100.0	33,526	16.9	198,164	100.0
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	13,814	2,299	1.3	16.6	9,097	65.9	2,418	17.5
Moderate	87,455	43,059	25.3	49.2	35,951	41.1	8,445	9.7
Middle	95,235	54,472	32.0	57.2	33,652	35.3	7,111	7.5
Upper	102,563	70,603	41.4	68.8	24,529	23.9	7,431	7.2
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	299,067	170,433	100.0	57.0	103,229	34.5	25,405	8.5
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low	1,386	4.8	1,216	4.6	160	8.7	10	5.0
Moderate	9,641	33.7	8,710	32.8	859	46.9	72	36.0
Middle	7,511	26.3	7,048	26.5	425	23.2	38	19.0
Upper	9,936	34.7	9,504	35.8	355	19.4	77	38.5
Unknown	128	0.4	91	0.3	34	1.9	3	1.5
Total AA	28,602	100.0	26,569	100.0	1,833	100.0	200	100.0
Percentage of Total Businesses:			92.9		6.4		0.7	
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low	3	2.0	3	2.1	0	0.0	0	0.0
Moderate	55	37.4	52	36.9	3	50.0	0	0.0
Middle	38	25.9	36	25.5	2	33.3	0	0.0
Upper	50	34.0	50	35.5	0	0.0	0	0.0
Unknown	1	0.7	0	0.0	1	16.7	0	0.0
Total AA	147	100.0	141	100.0	6	100.0	0	0.0
Percentage of Total Farms:			95.9		4.1		0.0	

Source: 2022 FFIEC Census Data
2022 Dun & Bradstreet Data
2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-9A

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.7	0	0.0	0.5	0	0.0	0.7	0	0.0	0.6	1.3
Moderate	6	28.6	17.0	1,078	15.8	13.9	0	0.0	20.5	0	0.0	18.2	25.3
Middle	3	14.3	25.1	910	13.3	21.5	1	14.3	28.9	158	8.7	25.2	32.0
Upper	12	57.1	57.2	4,833	70.9	64.1	6	85.7	49.8	1,667	91.3	56.0	41.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	21	100.0	100.0	6,821	100.0	100.0	7	100.0	100.0	1,825	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	0.6	0	0.0	0.5	0	0.0	1.0	0	0.0	0.8	1.3
Moderate	0	0.0	15.9	0	0.0	12.2	0	0.0	20.0	0	0.0	16.3	25.3
Middle	0	0.0	27.7	0	0.0	21.7	0	0.0	29.6	0	0.0	24.4	32.0
Upper	3	100.0	55.7	735	100.0	65.5	0	0.0	49.4	0	0.0	58.6	41.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	3	100.0	100.0	735	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.3	0	0.0	1.9	0	0.0	1.8	0	0.0	2.3	1.3
Moderate	0	0.0	20.0	0	0.0	19.7	0	0.0	15.6	0	0.0	15.0	25.3
Middle	0	0.0	26.5	0	0.0	25.9	0	0.0	28.0	0	0.0	25.2	32.0
Upper	1	100.0	51.3	150	100.0	52.5	0	0.0	54.5	0	0.0	57.6	41.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	150	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans													**Multi-family Units %**
Low	1	50.0	16.3	263	52.6	3.4	0	0.0	28.6	0	0.0	2.3	14.3
Moderate	0	0.0	40.8	0	0.0	26.8	0	0.0	42.9	0	0.0	46.7	35.5
Middle	1	50.0	26.5	237	47.4	52.8	0	0.0	11.4	0	0.0	22.3	28.3
Upper	0	0.0	16.3	0	0.0	17.1	0	0.0	17.1	0	0.0	28.7	22.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	500	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													**Owner Occupied Units %**
Low	1	3.6	0.8	263	3.1	0.6	0	0.0	0.9	0	0.0	0.7	1.3
Moderate	6	21.4	16.9	1,078	12.7	14.2	0	0.0	20.1	0	0.0	19.3	25.3
Middle	4	14.3	25.8	1,147	13.5	22.8	1	14.3	28.8	158	8.7	24.9	32.0
Upper	17	60.7	56.5	5,998	70.7	62.3	6	85.7	50.3	1,667	91.3	55.0	41.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	28	100.0	100.0	8,486	100.0	100.0	7	100.0	100.0	1,825	100.0	100.0	100.0

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

Table C-9B

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	2.5	0	0.0	3.0	1.3
Moderate	0	0.0	15.0	0	0.0	9.8	0	0.0	13.6	0	0.0	11.2	25.3
Middle	0	0.0	22.5	0	0.0	20.4	0	0.0	13.6	0	0.0	10.7	32.0
Upper	0	0.0	62.5	0	0.0	69.8	0	0.0	70.4	0	0.0	75.1	41.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	1.4	0	0.0	0.7	0	0.0	0.8	0	0.0	1.0	1.3
Moderate	0	0.0	15.3	0	0.0	15.1	0	0.0	16.0	0	0.0	14.7	25.3
Middle	0	0.0	25.2	0	0.0	21.7	0	0.0	23.5	0	0.0	19.0	32.0
Upper	1	100.0	58.1	280	100.0	62.5	0	0.0	59.7	0	0.0	65.3	41.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	280	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.3
Moderate	0	0.0	15.6	0	0.0	12.6	0	0.0	17.7	0	0.0	15.2	25.3
Middle	0	0.0	34.2	0	0.0	26.9	0	0.0	34.5	0	0.0	26.3	32.0
Upper	0	0.0	50.2	0	0.0	60.5	0	0.0	47.7	0	0.0	58.5	41.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

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

Table C-10

Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	3	8.6	4.2	1,310	10.8	5.9	4	10.5	4.2	1,392	12.4	5.8	5.0
Moderate	13	37.1	31.3	3,235	26.6	34.7	14	36.8	31.1	3,676	32.8	34.7	34.1
Middle	6	17.1	26.3	1,990	16.4	24.0	3	7.9	26.2	1,205	10.8	23.0	26.1
Upper	13	37.1	37.4	5,618	46.2	34.7	17	44.7	37.9	4,918	43.9	35.3	34.2
Unknown	0	0.0	0.4	0	0.0	0.5	0	0.0	0.3	0	0.0	1.0	0.5
Total	35	100.0	100.0	12,153	100.0	100.0	38	100.0	100.0	11,191	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 C-11A

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	0.8	0	0.0	0.3	0	0.0	0.4	0	0.0	0.1	21.9
Moderate	2	9.5	6.9	146	2.1	4.3	0	0.0	4.9	0	0.0	2.9	17.8
Middle	3	14.3	22.3	436	6.4	18.2	1	14.3	19.6	202	11.1	15.8	18.5
Upper	16	76.2	50.4	6,239	91.5	57.5	6	85.7	48.7	1,623	88.9	56.0	41.7
Unknown	0	0.0	19.5	0	0.0	19.7	0	0.0	26.3	0	0.0	25.1	0.0
Total	21	100.0	100.0	6,821	100.0	100.0	7	100.0	100.0	1,825	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.9	0	0.0	1.9	0	0.0	3.6	0	0.0	1.8	21.9
Moderate	0	0.0	11.7	0	0.0	7.7	0	0.0	11.6	0	0.0	7.4	17.8
Middle	0	0.0	22.1	0	0.0	18.4	0	0.0	22.4	0	0.0	17.6	18.5
Upper	3	100.0	46.9	735	100.0	54.4	0	0.0	50.6	0	0.0	56.4	41.7
Unknown	0	0.0	15.4	0	0.0	17.5	0	0.0	11.8	0	0.0	16.8	0.0
Total	3	100.0	100.0	735	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	6.0	0	0.0	4.0	0	0.0	2.7	0	0.0	1.7	21.9
Moderate	0	0.0	12.8	0	0.0	10.0	0	0.0	12.3	0	0.0	10.5	17.8
Middle	0	0.0	21.1	0	0.0	19.3	0	0.0	23.8	0	0.0	20.5	18.5
Upper	0	0.0	58.2	0	0.0	63.5	0	0.0	61.2	0	0.0	67.3	41.7
Unknown	1	100.0	1.9	150	100.0	3.3	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	150	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	1.8	0	0.0	0.7	0	0.0	1.0	0	0.0	0.3	21.9
Moderate	2	7.7	8.1	146	1.8	4.9	0	0.0	6.2	0	0.0	3.5	17.8
Middle	3	11.5	21.9	436	5.5	18.1	1	14.3	19.9	202	11.1	15.9	18.5
Upper	20	76.9	49.2	7,254	90.8	56.7	6	85.7	49.2	1,623	88.9	56.0	41.7
Unknown	1	3.8	19.0	150	1.9	19.6	0	0.0	23.7	0	0.0	24.3	0.0
Total	26	100.0	100.0	7,986	100.0	100.0	7	100.0	100.0	1,825	100.0	100.0	100.0

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

Table C-11B

Borrower Income Level	Bank And Aggregate Loans By Year											Families by Family Income %
	2022						2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	12.5	0	0.0	9.0	0	0.0	8.6	0	0.0	7.0	21.9
Moderate	0	0.0	7.5	0	0.0	4.4	0	0.0	8.6	0	0.0	7.4	17.8
Middle	0	0.0	7.5	0	0.0	9.1	0	0.0	7.4	0	0.0	6.8	18.5
Upper	0	0.0	67.5	0	0.0	72.9	0	0.0	72.8	0	0.0	75.6	41.7
Unknown	0	0.0	5.0	0	0.0	4.6	0	0.0	2.5	0	0.0	3.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	6.8	0	0.0	3.5	0	0.0	3.4	0	0.0	2.2	21.9
Moderate	0	0.0	12.2	0	0.0	7.8	0	0.0	11.8	0	0.0	9.4	17.8
Middle	0	0.0	19.8	0	0.0	15.2	0	0.0	23.0	0	0.0	18.1	18.5
Upper	1	100.0	53.2	280	100.0	60.8	0	0.0	59.1	0	0.0	66.3	41.7
Unknown	0	0.0	8.1	0	0.0	12.6	0	0.0	2.8	0	0.0	4.0	0.0
Total	1	100.0	100.0	280	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	5.3	0	0.0	2.0	0	0.0	1.4	0	0.0	0.5	21.9
Moderate	0	0.0	2.5	0	0.0	1.8	0	0.0	0.5	0	0.0	0.3	17.8
Middle	0	0.0	0.8	0	0.0	0.9	0	0.0	0.0	0	0.0	0.0	18.5
Upper	0	0.0	0.8	0	0.0	1.3	0	0.0	0.0	0	0.0	0.0	41.7
Unknown	0	0.0	90.5	0	0.0	93.9	0	0.0	98.2	0	0.0	99.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

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

Table C-12

	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	Total Businesses %
Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses **Assessment Area: El Paso Metropolitan**													
	Bank And Aggregate Loans By Year												**Total Businesses %**
	2022						**2023**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
By Revenue													
$1 Million or Less	11	31.4	50.6	3,959	32.6	35.7	9	23.7	49.7	3,135	28.0	32.6	92.7
Over $1 Million	6	17.1		2,257	18.6		13	34.2		3,865	34.5		6.7
Revenue Unknown	18	51.4		5,937	48.9		16	42.1		4,191	37.4		0.6
Total	35	100.0		12,153	100.0		38	100.0		11,191	100.0		100.0
By Loan Size													
$100,000 or Less	5	14.3	94.6	395	3.3	40.7	7	18.4	94.5	560	5.0	40.0	
$100,001 - $250,000	13	37.1	3.0	2,586	21.3	17.0	16	42.1	3.0	2,979	26.6	16.2	
$250,001 - $1 Million	17	48.6	2.3	9,172	75.5	42.3	15	39.5	2.5	7,652	68.4	43.9	
Total	35	100.0	100.0	12,153	100.0	100.0	38	100.0	100.0	11,191	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	1	9.1		80	2.0		2	22.2		170	5.4		
$100,001 - $250,000	4	36.4		658	16.6		2	22.2		410	13.1		
$250,001 - $1 Million	6	54.5		3,221	81.4		5	55.6		2,555	81.5		
Total	11	100.0		3,959	100.0		9	100.0		3,135	100.0		
Source: 2023 FFIEC Census Data													
2023 Dun & Bradstreet Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Table C-13

2023 Houston Metropolitan AA Demographics							
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.

Table C-14A

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: Houston Metropolitan							
Home Purchase Loans							
Low	0	0.0	5.6	0	0.0	4.1	7.5
Moderate	0	0.0	18.3	0	0.0	13.4	23.4
Middle	2	6.9	33.0	988	6.5	28.2	30.8
Upper	27	93.1	42.0	14,177	93.5	53.5	37.3
Unknown	0	0.0	1.0	0	0.0	0.8	1.0
Total	29	100.0	100.0	15,165	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	6.8	0	0.0	5.2	7.5
Moderate	0	0.0	22.9	0	0.0	16.5	23.4
Middle	0	0.0	33.7	0	0.0	26.9	30.8
Upper	0	0.0	35.8	0	0.0	50.6	37.3
Unknown	0	0.0	0.8	0	0.0	0.7	1.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	3.9	0	0.0	3.8	7.5
Moderate	0	0.0	15.3	0	0.0	12.9	23.4
Middle	0	0.0	28.8	0	0.0	22.8	30.8
Upper	0	0.0	51.1	0	0.0	59.7	37.3
Unknown	0	0.0	0.9	0	0.0	0.8	1.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	22.6	0	0.0	16.1	26.4
Moderate	0	0.0	28.2	0	0.0	26.3	27.9
Middle	0	0.0	18.5	0	0.0	20.1	19.2
Upper	0	0.0	27.7	0	0.0	33.1	21.9
Unknown	0	0.0	3.1	0	0.0	4.3	4.6
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	0	0.0	5.7	0	0.0	5.3	7.5
Moderate	0	0.0	18.7	0	0.0	14.8	23.4
Middle	2	6.9	32.9	988	6.5	27.2	30.8
Upper	27	93.1	41.7	14,177	93.5	51.5	37.3
Unknown	0	0.0	1.0	0	0.0	1.3	1.0
Total	29	100.0	100.0	15,165	100.0	100.0	100.0

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

Table C-14B

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: Houston Metropolitan							
Other Purpose LOC							
Low	0	0.0	3.3	0	0.0	2.0	7.5
Moderate	0	0.0	9.3	0	0.0	5.5	23.4
Middle	0	0.0	27.6	0	0.0	18.9	30.8
Upper	0	0.0	59.0	0	0.0	72.9	37.3
Unknown	0	0.0	0.9	0	0.0	0.8	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	5.4	0	0.0	5.5	7.5
Moderate	0	0.0	18.9	0	0.0	15.7	23.4
Middle	0	0.0	32.2	0	0.0	23.0	30.8
Upper	0	0.0	42.3	0	0.0	53.5	37.3
Unknown	0	0.0	1.2	0	0.0	2.4	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	5.0	0	0.0	2.7	7.5
Moderate	0	0.0	27.2	0	0.0	15.5	23.4
Middle	0	0.0	43.1	0	0.0	30.3	30.8
Upper	0	0.0	23.4	0	0.0	23.4	37.3
Unknown	0	0.0	1.3	0	0.0	28.1	1.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0

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

Table C-15

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	10.6	0	0.0	11.6	11.7
Moderate	5	27.8	21.9	2,175	34.5	24.4	23.0
Middle	0	0.0	25.4	0	0.0	22.8	25.1
Upper	13	72.2	39.8	4,126	65.5	38.9	38.2
Unknown	0	0.0	1.9	0	0.0	2.1	2.0
Total	18	100.0	100.0	6,301	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 C-16A

Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Distribution of 2023 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Houston Metropolitan							
Home Purchase Loans							
Low	0	0.0	2.2	0	0.0	1.0	27.2
Moderate	0	0.0	14.1	0	0.0	9.0	17.8
Middle	0	0.0	19.8	0	0.0	15.9	17.9
Upper	28	96.6	38.1	14,811	97.7	50.6	37.1
Unknown	1	3.4	25.7	354	2.3	23.5	0.0
Total	29	100.0	100.0	15,165	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	8.5	0	0.0	4.6	27.2
Moderate	0	0.0	17.2	0	0.0	11.1	17.8
Middle	0	0.0	20.0	0	0.0	15.2	17.9
Upper	0	0.0	38.3	0	0.0	51.3	37.1
Unknown	0	0.0	16.0	0	0.0	17.7	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	5.7	0	0.0	3.6	27.2
Moderate	0	0.0	14.2	0	0.0	9.0	17.8
Middle	0	0.0	18.8	0	0.0	13.3	17.9
Upper	0	0.0	58.8	0	0.0	68.5	37.1
Unknown	0	0.0	2.5	0	0.0	5.6	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	1.4	27.2
Moderate	0	0.0	14.4	0	0.0	9.2	17.8
Middle	0	0.0	19.6	0	0.0	15.7	17.9
Upper	28	96.6	39.1	14,811	97.7	51.0	37.1
Unknown	1	3.4	23.6	354	2.3	22.8	0.0
Total	29	100.0	100.0	15,165	100.0	100.0	100.0

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

Table C-16B

Distribution of 2023 Home Mortgage Lending By Borrower Income Level						
Assessment Area: Houston Metropolitan						
Borrower Income Level	**Bank And Aggregate Loans**					**Families by Family Income %**
	Bank		**Agg**	**Bank**		**Agg**	
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	
Other Purpose LOC							
Low	0	0.0	8.4	0	0.0	4.6	27.2
Moderate	0	0.0	9.6	0	0.0	5.4	17.8
Middle	0	0.0	16.0	0	0.0	9.2	17.9
Upper	0	0.0	63.8	0	0.0	78.6	37.1
Unknown	0	0.0	2.2	0	0.0	2.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt							
Low	0	0.0	6.5	0	0.0	4.2	27.2
Moderate	0	0.0	16.8	0	0.0	10.9	17.8
Middle	0	0.0	22.9	0	0.0	15.0	17.9
Upper	0	0.0	46.0	0	0.0	55.6	37.1
Unknown	0	0.0	7.8	0	0.0	14.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Purpose Not Applicable							
Low	0	0.0	1.8	0	0.0	0.9	27.2
Moderate	0	0.0	1.9	0	0.0	1.2	17.8
Middle	0	0.0	0.6	0	0.0	0.6	17.9
Upper	0	0.0	0.2	0	0.0	0.0	37.1
Unknown	0	0.0	95.5	0	0.0	97.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0

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

Table C-17

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	8	44.4	51.4	3,481	55.2	32.1	91.3
Over $1 Million	3	16.7		1,319	20.9		7.6
Revenue Unknown	7	38.9		1,501	23.8		1.1
Total	18	100.0		6,301	100.0		100.0
By Loan Size						
$100,000 or Less	3	16.7	94.2	226	3.6	39.9	
$100,001 - $250,000	6	33.3	3.1	1,231	19.5	15.6	
$250,001 - $1 Million	9	50.0	2.7	4,844	76.9	44.5	
Total	18	100.0	100.0	6,301	100.0	100.0	
By Loan Size and Revenues $1 Million or Less						
$100,000 or Less	1	12.5		100	2.9		
$100,001 - $250,000	2	25.0		456	13.1		
$250,001 - $1 Million	5	62.5		2,925	84.0		
Total	8	100.0		3,481	100.0		
Source: 2023 FFIEC Census Data						
2023 Dun & Bradstreet Data						
2016-2020 U.S. Census Bureau: American Community Survey						
Note: Percentages may not total 100.0 percent due to rounding.						

Table C-18

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

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

Table C-19

2022 Laredo MSA AA Demographics									
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**		
	#	%	#	%	#	%	#	%	
Low	3	4.3	2,034	3.3	955	47.0	15,840	25.8	
Moderate	31	44.9	23,602	38.5	8,064	34.2	9,031	14.7	
Middle	13	18.8	10,272	16.7	2,142	20.9	10,767	17.6	
Upper	20	29.0	25,415	41.4	2,474	9.7	25,696	41.9	
Unknown	2	2.9	11	0.0	0	0.0	0	0.0	
Total AA	**69**	**100.0**	**61,334**	**100.0**	**13,635**	**22.2**	**61,334**	**100.0**	

	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,444	1,374	2.9	39.9	1,446	42.0	624	18.1
Moderate	33,851	15,736	32.7	46.5	14,312	42.3	3,803	11.2
Middle	14,391	7,727	16.1	53.7	5,400	37.5	1,264	8.8
Upper	32,856	23,256	48.4	70.8	7,120	21.7	2,480	7.5
Unknown	11	0	0.0	0.0	11	100.0	0	0.0
Total AA	**84,553**	**48,093**	**100.0**	**56.9**	**28,289**	**33.5**	**8,171**	**9.7**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	448	4.6	402	4.6	39	4.5	7	9.0
Moderate	2,453	25.2	2,236	25.5	195	22.6	22	28.2
Middle	1,448	14.9	1,342	15.3	98	11.4	8	10.3
Upper	5,346	55.0	4,778	54.4	528	61.2	40	51.3
Unknown	29	0.3	25	0.3	3	0.3	1	1.3
Total AA	**9,724**	**100.0**	**8,783**	**100.0**	**863**	**100.0**	**78**	**100.0**
Percentage of Total Businesses:				**90.3**		**8.9**		**0.8**

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	3	3.3	3	3.4	0	0.0	0	0.0
Moderate	19	20.7	19	21.6	0	0.0	0	0.0
Middle	12	13.0	12	13.6	0	0.0	0	0.0
Upper	58	63.0	54	61.4	4	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**92**	**100.0**	**88**	**100.0**	**4**	**100.0**	**0**	**0.0**
Percentage of Total Farms:				**95.7**		**4.3**		**0.0**

Source: 2022 FFIEC Census Data
      2022 Dun & Bradstreet Data
      2016-2020 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-20A

Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography Assessment Area: Laredo MSA											

Geographic Income Level	Bank And Aggregate Loans By Year											Owner Occupied Units %
	2022						2023					
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans												
Low	1	5.3	1.4	150	3.2	1.2	0	0.0	0.5	0	0.0	0.4	2.9
Moderate	6	31.6	25.2	1,089	23.1	19.9	0	0.0	30.4	0	0.0	23.6	32.7
Middle	2	10.5	14.4	330	7.0	13.7	1	33.3	14.2	242	41.2	13.4	16.1
Upper	10	52.6	58.4	3,142	66.7	64.7	2	66.7	54.9	346	58.8	62.7	48.4
Unknown	0	0.0	0.6	0	0.0	0.6	0	0.0	0.0	0	0.0	0.0	0.0
Total	19	100.0	100.0	4,711	100.0	100.0	3	100.0	100.0	588	100.0	100.0	100.0
Refinance Loans												
Low	0	0.0	0.6	0	0.0	0.3	0	0.0	1.1	0	0.0	0.7	2.9
Moderate	1	100.0	15.6	76	100.0	12.0	0	0.0	28.0	0	0.0	22.0	32.7
Middle	0	0.0	11.2	0	0.0	8.2	0	0.0	13.3	0	0.0	10.0	16.1
Upper	0	0.0	72.5	0	0.0	79.6	1	100.0	57.6	104	100.0	67.3	48.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	76	100.0	100.0	1	100.0	100.0	104	100.0	100.0	100.0
Home Improvement Loans												
Low	0	0.0	2.1	0	0.0	4.6	0	0.0	0.0	0	0.0	0.0	2.9
Moderate	0	0.0	22.9	0	0.0	17.1	0	0.0	17.6	0	0.0	14.6	32.7
Middle	0	0.0	12.5	0	0.0	7.8	0	0.0	17.6	0	0.0	9.9	16.1
Upper	0	0.0	62.5	0	0.0	70.5	0	0.0	64.7	0	0.0	75.5	48.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans												Multi-family Units %
Low	0	0.0	3.4	0	0.0	0.6	0	0.0	5.6	0	0.0	1.1	3.6
Moderate	0	0.0	62.1	0	0.0	20.2	0	0.0	61.1	0	0.0	24.0	40.3
Middle	0	0.0	13.8	0	0.0	20.6	0	0.0	22.2	0	0.0	7.6	22.9
Upper	0	0.0	20.7	0	0.0	58.6	1	100.0	11.1	800	100.0	67.4	33.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	800	100.0	100.0	100.0
Total Home Mortgage Loans												Owner Occupied Units %
Low	1	5.0	1.3	150	3.1	1.0	0	0.0	0.6	0	0.0	0.4	2.9
Moderate	7	35.0	23.3	1,165	24.3	18.5	0	0.0	29.3	0	0.0	23.3	32.7
Middle	2	10.0	13.8	330	6.9	13.2	1	16.7	14.1	242	11.4	12.7	16.1
Upper	10	50.0	61.2	3,142	65.6	66.8	5	83.3	55.9	1,875	88.6	63.6	48.4
Unknown	0	0.0	0.4	0	0.0	0.4	0	0.0	0.0	0	0.0	0.0	0.0
Total	20	100.0	100.0	4,787	100.0	100.0	6	100.0	100.0	2,117	100.0	100.0	100.0

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

Table C-20B

Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	1.9	0	0.0	1.0	2.9
Moderate	0	0.0	3.3	0	0.0	0.5	0	0.0	9.3	0	0.0	8.6	32.7
Middle	0	0.0	6.7	0	0.0	8.5	0	0.0	9.3	0	0.0	8.5	16.1
Upper	0	0.0	90.0	0	0.0	90.9	0	0.0	79.6	0	0.0	81.9	48.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.7	0	0.0	10.1	0	0.0	2.4	0	0.0	3.6	2.9
Moderate	0	0.0	17.4	0	0.0	14.1	0	0.0	26.2	0	0.0	28.9	32.7
Middle	0	0.0	4.3	0	0.0	1.1	0	0.0	16.7	0	0.0	7.5	16.1
Upper	0	0.0	69.6	0	0.0	74.7	1	100.0	54.8	625	100.0	60.0	48.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	625	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	2.9
Moderate	0	0.0	19.4	0	0.0	13.6	0	0.0	16.9	0	0.0	14.2	32.7
Middle	0	0.0	17.8	0	0.0	15.6	0	0.0	12.3	0	0.0	8.1	16.1
Upper	0	0.0	62.8	0	0.0	70.9	0	0.0	70.8	0	0.0	77.7	48.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

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

Table C-21

	Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography Assessment Area: Laredo MSA												
	Bank And Aggregate Loans By Year												**Total Businesses %**
Geographic Income Level	**2022**						**2023**						
	Bank		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	**Bank**		**Agg**	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Low	1	5.0	2.9	10	0.2	2.0	0	0.0	3.2	0	0.0	1.9	4.6
Moderate	0	0.0	21.4	0	0.0	16.5	5	17.2	21.6	2,198	34.8	15.1	25.3
Middle	3	15.0	12.2	436	7.1	7.3	4	13.8	11.6	513	8.1	7.2	14.8
Upper	16	80.0	62.8	5,699	92.7	73.9	20	69.0	63.1	3,609	57.1	75.4	54.9
Unknown	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	0.3
Total	20	100.0	100.0	6,145	100.0	100.0	29	100.0	100.0	6,320	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 C-22A

Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level Assessment Area: Laredo MSA												
Borrower Income Level	Bank And Aggregate Loans By Year											Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Home Purchase Loans													
Low	0	0.0	1.8	0	0.0	0.9	0	0.0	0.6	0	0.0	0.3	25.8
Moderate	0	0.0	14.5	0	0.0	10.3	0	0.0	7.8	0	0.0	4.4	14.7
Middle	7	36.8	27.0	1,456	30.9	24.0	0	0.0	25.4	0	0.0	21.3	17.6
Upper	12	63.2	36.0	3,255	69.1	43.1	1	33.3	44.9	242	41.2	54.0	41.9
Unknown	0	0.0	20.6	0	0.0	21.6	2	66.7	21.3	346	58.8	20.0	0.0
Total	19	100.0	100.0	4,711	100.0	100.0	3	100.0	100.0	588	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.8	0	0.0	1.9	0	0.0	3.0	0	0.0	1.2	25.8
Moderate	0	0.0	10.3	0	0.0	6.4	1	100.0	5.9	104	100.0	3.1	14.7
Middle	0	0.0	23.5	0	0.0	19.2	0	0.0	16.6	0	0.0	12.3	17.6
Upper	1	100.0	42.2	76	100.0	51.1	0	0.0	57.9	0	0.0	65.9	41.9
Unknown	0	0.0	20.2	0	0.0	21.3	0	0.0	16.6	0	0.0	17.5	0.0
Total	1	100.0	100.0	76	100.0	100.0	1	100.0	100.0	104	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.1	0	0.0	0.5	0	0.0	0.0	0	0.0	0.0	25.8
Moderate	0	0.0	12.5	0	0.0	9.9	0	0.0	10.3	0	0.0	5.8	14.7
Middle	0	0.0	16.7	0	0.0	11.7	0	0.0	27.9	0	0.0	19.0	17.6
Upper	0	0.0	58.3	0	0.0	70.5	0	0.0	52.9	0	0.0	67.0	41.9
Unknown	0	0.0	10.4	0	0.0	7.3	0	0.0	8.8	0	0.0	8.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans													
Low	0	0.0	2.4	0	0.0	1.2	0	0.0	1.1	0	0.0	0.5	25.8
Moderate	0	0.0	13.3	0	0.0	9.6	1	20.0	7.5	104	7.9	4.3	14.7
Middle	7	35.0	25.0	1,456	30.4	22.7	0	0.0	23.8	0	0.0	20.2	17.6
Upper	13	65.0	36.5	3,331	69.6	43.9	2	40.0	46.0	867	65.8	54.8	41.9
Unknown	0	0.0	22.8	0	0.0	22.6	2	40.0	21.7	346	26.3	20.3	0.0
Total	20	100.0	100.0	4,787	100.0	100.0	5	100.0	100.0	1,317	100.0	100.0	100.0

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

Table C-22B

Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2022						2023						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	#	#%	#%	$(000)	$%	$%	
Other Purpose LOC													
Low	0	0.0	10.0	0	0.0	10.1	0	0.0	3.7	0	0.0	3.9	25.8
Moderate	0	0.0	13.3	0	0.0	7.2	0	0.0	11.1	0	0.0	8.8	14.7
Middle	0	0.0	10.0	0	0.0	10.2	0	0.0	18.5	0	0.0	17.0	17.6
Upper	0	0.0	63.3	0	0.0	69.5	0	0.0	64.8	0	0.0	67.1	41.9
Unknown	0	0.0	3.3	0	0.0	2.9	0	0.0	1.9	0	0.0	3.1	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
Other Purpose Closed/Exempt													
Low	0	0.0	8.7	0	0.0	10.0	0	0.0	11.9	0	0.0	7.2	25.8
Moderate	0	0.0	17.4	0	0.0	13.9	0	0.0	4.8	0	0.0	4.1	14.7
Middle	0	0.0	4.3	0	0.0	4.3	0	0.0	9.5	0	0.0	7.7	17.6
Upper	0	0.0	60.9	0	0.0	53.8	1	100.0	66.7	625	100.0	77.8	41.9
Unknown	0	0.0	8.7	0	0.0	17.9	0	0.0	7.1	0	0.0	3.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	625	100.0	100.0	100.0
Purpose Not Applicable													
Low	0	0.0	3.1	0	0.0	1.4	0	0.0	3.1	0	0.0	0.7	25.8
Moderate	0	0.0	1.6	0	0.0	1.0	0	0.0	0.0	0	0.0	0.0	14.7
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	1.5	0	0.0	1.9	17.6
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	41.9
Unknown	0	0.0	95.3	0	0.0	97.6	0	0.0	95.4	0	0.0	97.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0

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

Table C-23

Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses											**Assessment Area: Laredo MSA**	
	Bank And Aggregate Loans By Year											**Total Businesses %**
	2022					**2023**						
	Bank	**Agg**	**Bank**	**Agg**		**Bank**	**Agg**	**Bank**	**Agg**			
	#	**#%**	**#%**	**$(000)**	**$%**	**$%**	**#**	**#%**	**#%**	**$(000)**	**$%**	**$%**	
By Revenue													
$1 Million or Less	6	30.0	40.1	1,280	20.8	37.5	7	24.1	44.3	1,567	24.8	38.0	90.2
Over $1 Million	12	60.0		4,805	78.2		9	31.0		2,380	37.7		9.0
Revenue Unknown	2	10.0		60	1.0		13	44.8		2,373	37.5		0.7
Total	20	100.0		6,145	100.0		29	100.0		6,320	100.0		100.0
By Loan Size													
$100,000 or Less	7	35.0	88.4	314	5.1	30.7	13	44.8	87.3	667	10.6	30.1	
$100,001 - $250,000	4	20.0	6.7	857	13.9	21.4	8	27.6	7.2	1,305	20.6	21.7	
$250,001 - $1 Million	9	45.0	4.9	4,974	80.9	47.9	8	27.6	5.5	4,348	68.8	48.1	
Total	20	100.0	100.0	6,145	100.0	100.0	29	100.0	100.0	6,320	100.0	100.0	
By Loan Size and Revenues $1 Million or Less													
$100,000 or Less	2	33.3		38	3.0		5	71.4		226	14.4		
$100,001 - $250,000	2	33.3		408	31.9		0	0.0		0	0.0		
$250,001 - $1 Million	2	33.3		834	65.2		2	28.6		1,341	85.6		
Total	6	100.0		1,280	100.0		7	100.0		1,567	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 D – NONMETROPOLITAN LIMITED-SCOPE ASSESSMENT AREAS

Table D-1

2023 Refugio Nonmetropolitan AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	371	21.4
Moderate	0	0.0	0	0.0	0	0.0	321	18.6
Middle	2	100.0	1,730	100.0	226	13.1	381	22.0
Upper	0	0.0	0	0.0	0	0.0	657	38.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**2**	**100.0**	**1,730**	**100.0**	**226**	**13.1**	**1,730**	**100.0**

	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	3,725	1,869	100.0	50.2	697	18.7	1,159	31.1
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	**3,725**	**1,869**	**100.0**	**50.2**	**697**	**18.7**	**1,159**	**31.1**

	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	218	100.0	191	100.0	21	100.0	6	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**218**	**100.0**	**191**	**100.0**	**21**	**100.0**	**6**	**100.0**
Percentage of Total Businesses:				**87.6**		**9.6**		**2.8**

	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	30	100.0	30	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	**30**	**100.0**	**30**	**100.0**	**0**	**0.0**	**0**	**0.0**
Percentage of Total Farms:				**100.0**		**0.0**		**0.0**

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

Table D-2

2022 Refugio Nonmetropolitan AA Demographics								
Income Categories	**Tract Distribution**		**Families by Tract Income**		**Families < Poverty Level as % of Families by Tract**		**Families by Family Income**	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	371	21.4
Moderate	0	0.0	0	0.0	0	0.0	321	18.6
Middle	2	100.0	1,730	100.0	226	13.1	381	22.0
Upper	0	0.0	0	0.0	0	0.0	657	38.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2	100.0	1,730	100.0	226	13.1	1,730	100.0
	Housing Units by Tract	**Housing Type by Tract**						
		Owner-occupied			**Rental**		**Vacant**	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	0	0	0.0	0.0	0	0.0	0	0.0
Middle	3,725	1,869	100.0	50.2	697	18.7	1,159	31.1
Upper	0	0	0.0	0.0	0	0.0	0	0.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	3,725	1,869	100.0	50.2	697	18.7	1,159	31.1
	Total Businesses by Tract	**Businesses by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	220	100.0	191	100.0	21	100.0	8	100.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	220	100.0	191	100.0	21	100.0	8	100.0
Percentage of Total Businesses:			86.8		9.5		3.6	
	Total Farms by Tract	**Farms by Tract & Revenue Size**						
		Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**		
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	30	100.0	30	100.0	0	0.0	0	0.0
Upper	0	0.0	0	0.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	30	100.0	30	100.0	0	0.0	0	0.0
Percentage of Total Farms:			100.0		0.0		0.0	
Source: 2022 FFIEC Census Data								
2022 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-3

Distribution of 2023 Small Business Lending By Income Level of Geography
Assessment Area: Refugio Nonmetropolitan

Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	4	100.0	97.1	129	100.0	99.8	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	4	100.0	100.0	129	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

Distribution of 2023 Small Business Lending By Revenue Size of Businesses
Assessment Area: Refugio Nonmetropolitan

	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	$(000)	$%	$%	
By Revenue							
$1 Million or Less	4	100.0	36.3	129	100.0	16.1	87.6
Over $1 Million	0	0.0		0	0.0		9.6
Revenue Unknown	0	0.0		0	0.0		2.8
Total	4	100.0		129	100.0		100.0
By Loan Size							
$100,000 or Less	4	100.0	92.2	129	100.0	38.9	
$100,001 - $250,000	0	0.0	3.9	0	0.0	13.2	
$250,001 - $1 Million	0	0.0	3.9	0	0.0	47.9	
Total	4	100.0	100.0	129	100.0	100.0	
By Loan Size and Revenues $1 Million or Less							
$100,000 or Less	4	100.0		129	100.0		
$100,001 - $250,000	0	0.0		0	0.0		
$250,001 - $1 Million	0	0.0		0	0.0		
Total	4	100.0		129	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, relatively permanent statistical subdivision of a county. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts average about 4,000 inhabitants, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to the population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language:
1. Affordable housing (including multi-family rental housing) for low- or moderate-income individuals.
2. Community services targeted to low- or moderate-income individuals.
3. Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less.
4. Activities that revitalize or stabilize –
    a. Low- or moderate-income geographies.
    b. Designated disaster areas.
    c. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
        i. Rates of poverty, unemployment, and population loss.
        ii. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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