



PUBLIC DISCLOSURE

June 06, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Brady National Bank
Charter Number: 7827

101 S. Blackburn
Brady, TX 76825

Office of the Comptroller of the Currency

San Antonio Field Office
10001 Reunion Place, Suite 250
San Antonio, Texas 78216-4133

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

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Overall CRA Rating

Institution's CRA Rating: This institution is rated **Outstanding**

The lending test is rated: Outstanding

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable
- A majority of the bank's loans are inside its assessment area (AA)
- The bank exhibits an excellent geographic distribution of loans
- The bank exhibits reasonable distribution of loans to individuals of different income levels and to businesses of different sizes
- The bank exhibits excellent responsiveness to CD needs within its AA

Loan-to-Deposit Ratio

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

The bank's quarterly average LTD ratio calculated on a bank-wide basis for the evaluation period was 50 percent. During this time, the LTD ratio ranged from a low of 42 percent on December 31, 2020 to a high of 56 percent on June 30, 2018. The bank's average quarterly ratio improved slightly from 48 percent during the prior evaluation period.

The bank's quarterly average LTD ratio is consistent with the quarterly average LTD ratio for three similarly situated institutions. The similarly situated institution's quarterly average LTD ratio was 49 percent ranging from a low of 42 percent to a high of 56 percent.

Lending in Assessment Area

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

The bank originated and purchased 73 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	28	70	12	30	40	1,989	29	4,957	71	6,946
Small Business	30	75	10	25	40	1,003	22.7	3,413	77.3	4,416
Total	58	73	22	27	80	2,992	26	8,370	74	11,365

Description of Institution

The Brady National Bank (BNB) is an intrastate bank headquartered in Brady, TX. The bank is a wholly owned subsidiary of Texas Country Bancshares, Inc., a two-bank holding company. The holding company is located in Brady, TX and had total assets of \$40 million as of December 31, 2021. We did not review any affiliate activities for this performance evaluation.

The bank operates one location and two ATMs in Brady, TX. The bank has not opened or closed any branches since the previous evaluation and there was no merger or acquisition activity. Refer to “Description of Institution’s Operations in Texas” in the State Rating section for additional information.

The bank offers a variety of services including loan and deposit products as well as investment management services. As of December 31, 2021, BNB reported total assets of \$144 million. Tier 1 capital totaled \$13 million, and the tier 1 leverage ratio was 9.04 percent. The bank’s net loans totaled \$64.9 million, representing 45 percent of total assets and 50 percent of all deposits. BNB’s loan portfolio is composed of commercial loans (48 percent), residential real estate and multifamily (30 percent), farmland and agriculture (15 percent), and consumer loans (7 percent).

In response to the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) established in 2020, BNB participated in the Small Business Administrations’ Paycheck Protection Program (PPP). These loans were designed to provide a direct incentive for small businesses to keep their workers on payroll during the COVID pandemic. The bank originated 348 PPP loans totaling \$7.4 million between 2020 and 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending test was January 1, 2019 through December 31, 2021. Qualifying lending activities performed in response to the Coronavirus pandemic during the evaluation period are included in this CRA evaluation. At management’s request, we evaluated CD activities. The evaluation period for CD activities was April 4, 2017 through December 31, 2021, due to the substantial amount of activity conducted in 2017 and 2018.

To evaluate lending performance, analysis was completed on random samples of home mortgage loans and commercial loans. For the geographic and borrower distribution analyses, we compared lending performance data to updated 2015 American Community Survey census data effective January 2017.

Selection of Areas for Full-Scope Review

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

regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank's overall rating is based on performance in the State of Texas. The state rating is based on performance in the bank's one AA. Small business lending was weighted heavier when concluding on the lending test due to commercial lending representing the largest part of BNB's portfolio. Refer to the "Scope" section under the state rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

State Rating

State of Texas

CRA rating for the State of Texas: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The bank's LTD ratio is reasonable
- A majority of the bank's loans are inside its AA
- The bank exhibits an excellent geographic distribution of loans
- The bank exhibits reasonable distribution of loans to individuals of different income levels and to business of different sizes
- The bank exhibits excellent responsiveness to CD needs within its AA

Description of Institution's Operations in Texas

BNB operates one location in the state of Texas. The bank's headquarters is in Brady, TX, and located inside its designated AA of McCulloch County. The AA meets the requirements of the regulation and does not exclude any low- or moderate- income (LMI) geographies. Principal communities located in the AA include the city of Brady, which is the county seat, and the smaller adjacent communities of Lohn, Melvin, Rochelle, and Voca.

McCulloch County AA

The AA sits in rural central Texas, approximately 80 miles from San Angelo, TX. McCulloch County had a total population of 7,630 as of the 2020 census. July 2021 census data indicated a modest population decline of 1.3 percent since the census was taken. Brady, TX is the largest city in the county with a population of 5,118.

The McCulloch County AA consists of three census tracts (CT)s, two of which are middle-income and one moderate-income CT. Brady is located within the moderate-income CT. At the last evaluation, the moderate-income CT was designated as a distressed middle-income CT. The 2020 census data reported a county-wide poverty rate of 16.2 percent, exceeding both statewide and national poverty rates. The bank's single-branch location and two ATMs are located entirely in the moderate-income CT.

The largest industry in the AA is services at 33 percent followed by retail and agriculture at 15 and 9 percent, respectively. The U.S. Bureau of Labor Statistics (BLS) identified the unemployment rate for McCulloch County as 5.1 percent as of December 2021, comparing less favorably to 4.9 and 3.9 percent unemployment rates in Texas and nationally. Major employers in the AA include the local medical system, local school systems and government, and the Walmart store in Brady. McCulloch County is home to numerous farming and ranching operations outside Brady city limits. The county is also a popular seasonal hunting area.

The McCulloch County AA is a competitive banking environment. The county houses two deposit-taking banks, both of which are local Texas based institutions. The FDIC's Deposit Market Share Report as of June 30, 2021, indicates each bank operates out of one office in the county. BNB holds the largest market share at 51 percent.

Demographic Information of the Assessment Area						
Assessment Area: McCulloch County						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	3	0.0	33.3	66.7	0.0	0.0
Population by Geography	8,273	0.0	66.3	33.7	0.0	0.0
Housing Units by Geography	4,284	0.0	58.3	41.7	0.0	0.0
Owner-Occupied Units by Geography	2,468	0.0	59.6	40.4	0.0	0.0
Occupied Rental Units by Geography	677	0.0	72.8	27.2	0.0	0.0
Vacant Units by Geography	1,139	0.0	46.9	53.1	0.0	0.0
Businesses by Geography	583	0.0	75.3	24.7	0.0	0.0
Farms by Geography	61	0.0	36.1	63.9	0.0	0.0
Family Distribution by Income Level	2,149	25.0	20.1	19.6	35.2	0.0
Household Distribution by Income Level	3,145	22.7	16.1	19.9	41.3	0.0
Median Family Income Non-MSAs - TX		\$52,198	Median Housing Value			\$78,537
			Median Gross Rent			\$631
			Families Below Poverty Level			12.4%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

To help identify needs and opportunities in the AA we completed and reviewed three community contacts with local organizations. The contacts described the economic conditions of the area as stable but with limited growth. One contact described the primary needs of the area as basic living, housing, and medical needs. The contacts were not aware of any opportunities in the areas for financial institutions. The contacts had favorable opinions of local financial institutions' involvement in the local community.

Scope of Evaluation in Texas

As the bank's only AA, the McCulloch County AA received a full-scope review.

LENDING TEST

The bank's performance under the Lending Test in Texas is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the McCulloch County AA is excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the State.

Home Mortgage Loans

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

The geographic distribution of the bank's home mortgage loans is excellent. The AA does not include any low – income geographies. The percentage of bank loans in moderate – income geographies exceeded the percentage of owner – occupied housing units in the area and other area mortgage lenders as reported in the Aggregate Lending (aggregate) data.

Small Loans to Businesses

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

The geographic distribution of the bank's small loans to businesses is excellent. The AA does not include any low – income geographies. The percentage of bank loans in moderate – income geographies exceeded both the percentage of businesses within the geography and aggregate data from other small business lenders in the area.

Lending Gap Analysis

We reviewed geographic distribution reports for home mortgage loans and small loans to businesses in the AA and did not identify any unexplained conspicuous gaps in lending activity.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The distribution of home mortgage loans to individual of difference income levels is reasonable. The percentage of bank loans to low – income borrowers is below the percentage of low – income families in the AA but exceeded aggregate lending data. The percentage of bank loans to moderate – income borrowers exceeded both the percentage of moderate – income families and aggregate lending data.

Small Loans to Businesses

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

The distribution of small loans to businesses is excellent. The percentage of bank loans to businesses with annual revenues of \$1 million or less exceeded the reported percentage of small businesses in the AA and significantly exceeded the aggregate percentage reported by other business lenders in the AA.

Responses to Complaints

There were no consumer complaints regarding the bank's CRA performance or complaints indicating illegal or discriminatory lending practices during the evaluation period.

COMMUNITY DEVELOPMENT

Based on our full-scope review, the bank exhibits excellent responsiveness to community development needs in the state through qualified investments and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA. Performance related to community development activities had a positive effect on the bank's rating in the state.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
McCulloch County	2	1,058	8	401	10	100	1,459	100	-	-
Total	2	1,058	8	401	10	100	1,459	100	-	-

Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

During the evaluation period, BNB's qualified investments included investments totaling \$345,000 and donations totaling approximately \$56,000. The investments and donations provided funding for LMI services and for rehabilitating and expanding schools within the AA. Examples of the investments and donations include:

- Two bonds totaling \$345,000 issued by Brady Independent School District to renovate an elementary school, update safety and security equipment across the school district, and build a new career center for students.
- Three donations totaling \$2,124 to the local elementary school to purchase financial literacy handbooks for students.
- Five donations over the evaluation period totaling \$45,000 for scholarships to graduating seniors at the local high school, where the majority of students are considered economically disadvantaged.

BNB continues to hold two prior period investments with Small Business Investment Companies (SBIC), which focus on economic development through lending and equity investments in small to medium size businesses. These funds focus on investments in broader statewide and regional areas, including the bank's AA. As of December 31, 2021, BNB's book value in the SBICs totaled approximately \$1.06 million.

Extent to Which the Bank Provides Community Development Services

During the evaluation period, bank officers and staff provided 2,647 hours of service to 15 organizations that provide CD services in the AA. Activities included providing leadership and technical expertise through board and committee membership. Examples of CD services conducted during the evaluation period in the AA include:

- Economic Development Board City of Brady – One employee provided 142 hours of service as a board member and treasurer. The organization works to leverage the city's resources to improve life for residents in Brady. Over the evaluation period several grants were made to small business owners during the COVID pandemic.
- First United Methodist Church – One employee provided 114 hours of service as the finance chairman. One of the organization's regular projects involves providing funds to The Mission of Brady, an initiative to improve and weatherize LMI homesteads within the AA.
- Housing Authority City of Brady – Over the evaluation period two employees provided 61 hours of service as board members. This organization helps to implement rules regarding government housing for LMI participants and overseeing the financial status of the units and special projects to update efficiencies of the living units.

BNB's physical locations and online services are reasonably accessible to the entire community, including LMI individuals. The bank's one location and two ATMs are located in a moderate – income CT.

Appendix A: Scope of Examination

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

Time Period Reviewed:	Lending Test – 1/1/2019-12/31/2021 CD Test – 4/4/2017-12/31/2021	
Bank Products Reviewed:	Home mortgages and small business loans Qualified investments and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Texas		
McCulloch County AA	Full-Scope	McCulloch County – Includes all three census tracts within the county.

Appendix B: Summary of MMSA and State Ratings

RATINGS: The Brady National Bank	
Overall Bank:	Lending Test Rating
The Brady National Bank	Outstanding
MMSA or State:	
Texas	Outstanding

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

[Click or tap here to enter text.](#)

Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
McCulloch County AA	28	1,989	100	113	0.0	--	0.0	59.6	89	61.1	40.4	11	38.9	0.0	--	0.0	0.0	--	0.0
Total	28	1,989	100	113	0.0	--	0.0	59.6	89	61.1	40.4	11	38.9	0.0	--	0.0	0.0	--	0.0

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
McCulloch County AA	28	1,989	100	113	25.0	7.1	4.4	20.1	25	14.2	19.6	35.7	22.1	35.2	32.1	34.5	0.0	--	24.8
Total	28	1,989	100	113	25.0	7.1	4.4	20.1	25	14.2	19.6	35.7	22.1	35.2	32.1	34.5	0.0	--	24.8

*Source: 2015 ACS ; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2019-21**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
McCulloch County AA	30	1,252	100	104	0.0	--	0.0	75.3	83.3	65.4	24.7	16.7	34.6	0.0	--	0.0	0.0	--	0.0
Total	30	1,252	100	104	0.0	--	0.0	75.3	83.3	65.4	24.7	16.7	34.6	0.0	--	0.0	0.0	--	0.0

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

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2019-21**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
McCulloch County AA	30	1,252	100	104	77.2	86.7	21.2	5.3	13.3	17.5	--
Total	30	1,252	100	104	77.2	86.7	21.2	5.3	13.3	17.5	--

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