



## **Community Reinvestment Act Public File**

**2026**

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## **Public Comments**

The Bank did not receive any written public comments in 2023. The Bank did receive one written comment in 2024 and one comment in 2025. See attached.

## **Duncan-Smith, Denise**

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**From:** Smith, Karen R  
**Sent:** Monday, May 6, 2024 8:31 AM  
**To:** Duncan-Smith, Denise  
**Subject:** FW: [External] CRA Protest Complaint - Third Coast Bank  
**Attachments:** FRB CRA Protest Complaints 1.docx; Zip Codes Letter (1).doc  
  
**Categories:** Red category

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**From:** Barry Simmons <rendexes@gmail.com>  
**Sent:** Friday, May 03, 2024 7:24 PM  
**To:** Smith, Karen R <karen.r.smith@dal.frb.org>  
**Subject:** [External] CRA Protest Complaint - Third Coast Bank

**PLEASE NOTE: This email is not from a Federal Reserve address.**

Do not click on suspicious links. Do not give out personal or bank information to unknown senders.

Please fin Attached the CRA Protest Complaint filed against Third Coast Bank to dent approval of the New Bank Branch Application for the 800 Gessner Road - Houston location - this will be the 16th out of 16 Bank Branches in Texas for this Bank

This is clear and convincing evidence that Third Coast Bank has no regard for the banking laws, the Civil Rights or for the Rule of Law and is evidence of reckless disregard for the "full enjoyment of the rights in equal banking for the protected class of black Americans"

Please verify receiving

Thank You

Barry Simmons

[Rendexes@gmail.com](mailto:Rendexes@gmail.com)

(832) 258-3040

**Federal Reserve Bank**

**Karen Smith**

**May 3, 2024**

**RE: CRA Protest Complaint / New Bank Branch Applications**

**IMPORTANT**

Prior to the automatic granting of Approval of the New Bank Branch Applications predicated on “Delegated Authority” please READ the CRA Protest Complaint in its entirety. Where Third Coast Bank cannot provide the supporting evidence that the Bank is in **full compliance** with all of the components of all of the banking laws, with the components of all of the applicable (cited) controlling authority of the Court rulings and with all of the components of the Department Rules (HUD Fair Housing Act Final Rule – the New Bank Branch Applications are to be denied.

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**This** letter is part of the continuing communications between the **Renaissance Indexes Group** (RIG, Claimant) and the **Federal Reserve Bank** and outlines the **CRA Protest Complaint** filed by Claimant for full Agency investigations and to deny approval of the **New Bank Branch Applications** submitted by **Third Coast Bank** for the 800 Gessner Road 77024 location in the Houston MSA. This proposed New Bank Branch is also **placed outside** of the black American Neighborhoods in Houston and in Houston.

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The New Bank Branch Application will mark the **16<sup>th</sup>** out of the **16** Bank Branches in a row in Houston (and in Texas) that **Third Coast Bank will have placed outside** of the black American Neighborhoods in Houston. In addition to providing the evidence that **Third Coast Bank** has structured its business to avoid the credit needs of the protected class of black Americans, this consistent practice and action of Third Coast Bank branch placement denies the protected class of black Americans the equal opportunity to secure credit transactions. This consistent practice and action is in violation of the Community Reinvestment Act, Equal Credit Opportunity Act, Fair Housing Act – Final Rule and is in violation of the controlling authority of the Court rulings in US V Chevy Chase FSB, US V Hudson City Savings , US V BankSouth and is in violation of the Supreme Court holding in TDHCA V ICP, Inc.

Pursuant to its duties under the Fair Housing Act Final Rule **Third Coast Bank** is duty bound to provide the legally sufficient justification to prove -with supporting evidence - that these consistent practices are necessary to achieve one or more of the Banks’

legitimate substantial nondiscriminatory interests – where **Third Coast Bank** fails to fulfil this burden shifting duty –

**the Illegal Discrimination Claims stands**

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The CRA Protest Complaint is filed under the Community Reinvestment Act, (CRA), Equal Credit Opportunity Act (ECOA), Fair Housing Act – to include the Final Rule, FTC Act- Section 5, (Deceptive Practices), Home Mortgage Disclosure Act, Fair Lending Laws, Regulation B & C, Title VIII – 1968 Civil Rights Act and under the Equal Protection Clause – 14<sup>th</sup> Amendment – United States Constitution

The **CRA Protest Complaint** is filed under the controlling authority of the

--US Supreme Court ruling in **TDHCA V ICP, Inc.** – which established liability under the **FHA** for any Bank (or lender) practice or action – even where facially neutral - that has the disparate impact on members of a protected class – in this case the protected class of black Americans

-the controlling authority of the federal district court ruling in **US V Hudson City Savings** Bank FSB that established and expanded liability under the **ECOA** for any Bank practice that denied the equal opportunities to secure credit transactions and for any Bank practice that discourages members of a protected class from applying for credit – specific example cited in this case and in the RIG CRA Protest Complaint – is the continuing Bank practice of placing its Bank branches outside of the Neighborhoods of the protected class of black Americans

-the controlling authority of the Federal District Court ruling in **US V Chevy Chase FSB** that expanded Bank liability under the **FHA** – (to include the Final Rule) and **ECOA** for any Bank practices that has the disproportionate discriminate effect on the members of a protected class – to include the protected class of black Americans – to include placement of Bank branches outside of the black American Neighborhoods – as in this case against **Third Coast Bank**

-the controlling authority of the Department Complaint – HUD Discrimination Charges – holding in **US Midland States Bancorp** that established liability under the banking laws where the Bank has structured its business in such a way as to avoid doing equal business in the black American Neighborhoods, for any Bank practice that fail to penetrate the communities of members of a protected class with equal lending and that failed to equally market its lending and credit products to the members of a protected class

**Claimant** respectfully **petitions** that the **Federal Reserve Bank** faithfully execute its sworn duties in a way that is consistent with the controlling authority of the Court rulings -and to apply and to conduct the investigation and to enforce the rules pursuant to the Fair Housing Act – **Final Rule** to the Complaint. The Illegal Discrimination Claims in the RIG CRA Protest Complaint are not “comments to be considered” rather the **List of Illegal Discrimination Claims** are full-blown Complaints and form the *prima facie* case for disparate impact by the practices and actions (and non-actions) of **Third Coast Bank under the FHA Final Rule**.

**Claimant** further petitions that **FRB** honor the **Claimants** rights to frame the CRA Protest Complaint – the Complaint is limited to the underserved individuals, households businesses in the Neighborhoods in the specified Zip Codes of the protected class of black Americans.

Neither the **FRB** nor **Third Coast Bank** has the right to **replace** –and in effect to ignore -the clearly identified aggrieved parties of

#### **PROTECTED CLASS OF BLACK AMERICANS**

with “minority census tracts”, LMI census tracts”, majority-minority census tracts”, “high minority census tracts” – that are all found **outside** of the black American Neighborhoods in the specified Zip Codes.

Such **outside** findings do nothing to deliver the **full enjoyment of equal rights** in banking, lending and capital to the protected class of black Americans specifically named in the RIG Complaints – secured under the CRA, ECOA, FHA –Final Rule, FTA Act- Section 5, Regulations B & C

Under this present untenable and unreasonable posture **Third Coast Bank** is enabled by the **FRB** to deny the equal rights in equal access to capital, banking, lending, Bank branches and banking services to the black American Neighborhoods **from here until eternity** with impunity and with no sanctions by the FRB – the evidence for this posture is found in the truth that the vast majority of **Third Coast Bank** branches and the locations are all **outside** of the black American Neighborhoods in Houston (and in Dallas)

Indeed, such actions and practices by the **FRB** are just as repulsive as the practices and actions of **Third Coast Bank that** result in the disparate impact and disproportionate discriminate effect on the protected class of black Americans

--are the worst kind of “governmental support” as cited by the Supreme Court Justice Anthony Kennedy in the controlling ruling in **TDHCA V ICP, Inc**

--work to enable **Third Coast Bank** to continue to deny the equal rights to lending, Bank branches, banking services community outreach to the protected class of black Americans inside of the specified Zip Codes --are complete failings of the faithful execution of sworn duties – are deliberate supervisory failings and enforcement lapses – made all the more hideous as it is done by the very Agency vested with the sworn duties to investigate illegal discrimination, enforce the broad remedial corrective enforcement actions and to sanction and to punish the Banks for continued practices and actions that result in the disparate impact and in the disproportionate discriminate effect on the protected class of black Americans

**The Agency's** sworn duties under the law as part of the enforcement branch of government assigned with the enforcement of the banking laws are all too clear –

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The FRB has acted in a manner that is inconsistent with the controlling authority of the US Supreme Court rulings in **TDHCA V ICP, Inc** , inconsistent with the Department's **FHA Final Rule** – and is inconsistent with the controlling authority of **US V Hudson City Savings Bank FSB** ruling – which collectively form the **New Standards** that govern the banking complaint investigations and enforcement actions

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**The Banks'** legal obligations under the **FHA – Final Rule** are clear – and are not open to Agency (or Bank) reinterpretation:

Pursuant to the RIG Complaint the prima facie case for disparate impact and illegal discrimination on members of a protected class is established – **Third Coast Bank is** legally

obliged to provide the legally sufficient justification to prove that the practices challenged in the Complaint are necessary to achieve one or more of the Bank's legitimate substantial nondiscriminatory interests – and that these interests – where legitimate – could not be achieved by another practice with a less discriminatory effect.

Even where **Third Coast Bank meets** the initial burden of proof the Claimant may still establish liability under the **FHA Final Rule** by presenting a different Bank practice that has a less discriminatory effect.

The **FHA Final Rule** allows for no exceptions, waivers, partial measures, or denials of the Illegal Discrimination Claims – **Third Coast Bank** either fully meets this burden of proof pursuant to its responsibilities under the **FHA Final Rule** – or it does not – where **Third Coast Bank** fails to fully meet this burden of proof the Illegal Discrimination Claims stands –where **Third Coast Bank** refuses to answer the Illegal Discrimination

Claims – the Claims stands. The FRB is duty bound to impose the enforcement actions. AS the Fair Housing Act calls for broad remedial measures for the reclamation of the denial of equal rights in equal access to capital, banking, lending, banking services denied to members of a protected class – in this case the protected class of black Americans - the Agency is bound by the FHA's broad remedial reach – as in **Robust Capitalized Measures** - RCM

**The** overarching theme in the RIG CRA Protest Complaint is that **Third Coast Bank** has engaged (and is still engaged) in practices, actions (and non-actions) and patterns that are in violation of the **Fair Housing Act** – to include the Final Rule 100.500 and in violation of the **Equal Credit Opportunity Act** and of Regulation B

--by designating their service and CRA Assessment Area in such a way that excludes the areas of concentration of the majority black American Neighborhoods and of locating its branches and services in such a manner that did not (and does not) grant equal access based on race and Zip Codes divisions and of failing to market its lending and its residential real estate related products to the protected class of black Americans.

--these practices and actions result in a lack of market penetration in the majority black American Neighborhoods in the urban markets.

--where the physical address of the Bank branches and geographical dollar amounts evidence manifest that **Third Coast Bank** has avoided doing Equal business in and has placed its bank branches and lending outside of the majority black American Neighborhoods in the specified Zip Codes in Houston the FHA, ECOA and Regulation B make no distinction of where and whatever other Neighborhoods the Bank is doing business and has placed its Bank branches in – whether **100%** of its Bank branches and lending are placed in the Anglo Neighborhoods or whether **75%** in the Anglo Neighborhoods and **25%** in “majority-minority” or “minority census tracts” that are all outside of the majority black American Neighborhoods in the specified Zip Codes this practice by the Bank **effects the same results –disparate impact on the protected class of black Americans**.

--the denial of the full enjoyment of Equal rights secured under the CRA, ECOA, FHA – to include the Final Rule and Regulation B and Title VIII – 1968 Civil Rights Act

To the protected class of black Americans in the majority black American Neighborhoods in the specified Zip Codes

The scrambling, finding, and stumbling upon **Third Coast Bank branches**. Lending, Community Development Loans, community outreach, advertising and Charitable Contributions in other “minority census tracts” and in other “majority-minority districts” “LMI census tracts” – that are all outside of the majority black American Neighborhoods

is **denial** of Rights of Claimant, not acceptable and no longer works as an excuse to get the Bank off on the **Illegal Discrimination Claim** of illegal discrimination in the placement of Bank branches and lending – and in other banking category..

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The Agency determinations of illegal discrimination in all of the banking categories outlined in the Complaint can only be made by what is **found** and is not found inside of the majority black American Neighborhoods in the specified Zip Codes

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**Third Coast Bank** has avoided doing **business** in the black American Neighborhoods in – as evidenced by the fact that **Third Coast Bank** has not built a single Bank branch, has not made a single increase in **lending** – business, mortgage or home Equity, has not made a single increase in any **bank financed developments** – stores, hotels, apartments, office towers, luxury mixed use developments, does not have single annual advertising contract and has not made single increase in **advertising**, does not have a single black American Capitalized CRA Partnership, does not have a single Capitalized black American **Neighborhood group**, does not have a single black American Capitalized Credit Needs Assessment Consultant. has not made a single increase in **Community Outreach, promotion or marketing** of a single loan or credit products, has not made a single **Community Development Loan**, has not made s ingle increase in any **Charitable Contribution**, has not made a single increase in any **commercial or construction** lending, in a **single** black American Neighborhood in a **single specified Zip Codes**.

**Third Coast Bank is** as invisible in the black American Neighborhoods and in the other markets today as it was when the Bank first opened.

#### **Standard is Equal / Not Adequate**

The standard for the rights of the protected class of black Americans and what is to determine the findings of illegal discrimination, redlining and violations of the banking laws against **Third Coast Bank** for the following: Bank branches, bank financed developments, lending- business, mortgages, home equity –in Equal numbers, amounts terms – Community Development Loans, advertising, promotion of loan and credit products, asset based financing and financing of wealth creating entities – Stock Brokerage Houses, Trading Companies, Private Equity Groups -

is **EQUAL** not Adequate.

Claimant finds nowhere in the banking laws: CRA, ECOA, FHA – to include the Final Rule, Regulation B, Fair Lending Laws where the standard for the protected class of

black Americans is Adequate rather than **EQUAL**, Claimant finds nowhere in the rulings of the governing cases of US V Chevy Chase FSB and US V Hudson City Savings Bank and US V First American Bank where the standard to determine violation of the banking laws is Adequate rather than **EQUAL**

Claimant finds nowhere in the Civil Rights Laws – Title VIII – 1968 Civil Rights Act – where the standard for the protected class of black Americans has been lowered to Adequate rather than **EQUAL**

Claimant finds nowhere in the Equal Protection Clause – 14<sup>th</sup> Amendment – US Constitution where the Bank can legally hold the protected class of black Americans to the lower standard of Adequate rather than **EQUAL – and still be in compliance with the laws.**

Claimant finds nowhere in the banking regulations and statutes where the Bank can be placed in and remain **in full compliance** with all of the banking laws – CRA, ECOA, FHA , Regulation B and FTC Act – Section 5 while relegating the protected class of black Americans to the second standard of Adequate rather than **EQUAL**

Claimant finds nowhere in the laws where the protected class of black Americans are not held to the same standard of the full enjoyment of **EQUAL** rights in banking services, branches, lending ,Community Development Loans and in bank financed Developments

Claimant petitions that **Third Coast Bank be** held to the standard of **EQUAL** by the **FRB-D** to determine whether **Third Coast Bank has** perpetrated illegal discrimination, redlining and denial of equal access to capital against the protected class of black Americans in the 21 Zip Codes outlined in the Claimants' banking complaint.

### **Illegal Discrimination Claim Certification**

Pursuant to the deep, wide, Color of Money Investigation into the CRA Protest Complaint and pursuant to the search for the whole truth Claimant petitions the following:

--That **Third Coast Bank be** directed to answer the **Illegal Discrimination Claims** (IDC) directly –as in refute with evidence and present the legally sufficient justification to justify the stark and glaring disparities outlined in the Claims –

--That where **Third Coast Bank** cannot refute the IDC with evidence and fails to present the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests and that these interests – where legitimate – cannot be achieved by another practice that has a less discriminatory effect that the **IDC** is

certified as true, entered into the investigation report and becomes the calculation for the Fines, Sanctions, Penalties, Monitoring and Capital Fund to be imposed –

The Illegal Discrimination Claims are as follows:

**Bank Branches**

The Claim in the Complaint states that **Third Coast Bank** is engaged in the continuing practice of placing its Bank branches outside of the black American Neighborhoods – in the specified Zip Codes- as found from the evidence data – the **geographical reality of brick and mortar placement** – that **Third Coast Bank** has placed **98%** of its Bank branches – **free-standing edifices- outside** of the black American Neighborhoods and in the neighborhoods of the Anglo Zip Codes – and has placed **less than 2% of its Bank** branches in the specified Zip Codes in the neighborhoods of the protected class of black Americans –The Claim establishes the *prima facie* case for disparate impact on the protected class of black Americans and establishes liability under the FHA Final Rule and for disproportionate discriminate effect under the ECOA.

Pursuant to its responsibilities under **the FHA Final Rule** **Third Coast Bank** is legally obliged present the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests and that these interests – where legitimate – cannot be achieved by another practice with a less discriminatory effect justify this stark and glaring disparity and denial of the full banking services that can only be found in full service Bank branches in equal bank branch geographical distribution.

Should the deep, wide , Color of Money **CRA Protest Complaint** Investigation find from the evidence data that this geographical reality of **Bank branch placement action** by **Third Coast Bank** has the requisite **disparate impact** and the **disproportionate discriminate effect** on the protected class of black Americans and forms the *prima facie* case for illegal discrimination pursuant to the **FHA Final Rule** and to the **ECOA Effects Test**; forms the case for non-compliance and for violation of the banking laws **and** that this geographical reality of Bank branch placement is in violation of the holding in the governing cases of **US V Hudson City Savings Bank** US V FSB and **US V Chevy Chase FSB**.

Claimant respectfully petitions:

That where **Third Coast Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests that the **Illegal Discrimination Claim** of illegal discrimination in equal Bank branches is certified as true and that it be notated in the official investigation report that in the **geographical distribution of Bank**

**branches** between the neighborhoods in the Anglo Zip Codes and the neighborhoods in the Zip Codes of the protected class of black Americans that **Third Coast Bank**– is in violation of the ECOA and FHA to include the Final Rule.

### **Advertising / Marketing Placement**

The Claim in the Complaint states that **Third Coast Bank has** failed to equally market the full range of its lending and credit products with the black American Media and to the black American Neighborhoods – and has failed to penetrate the black American Neighborhoods in **the** assessment areas where Frost does business.

Pursuant to its responsibilities under the FHA Final Rule **Third Coast Bank is** legally obliged to provide the legally sufficient justification to prove that the practice challenged in the Complaint to prove that this practice is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests and that these interests – where legitimate – could not be achieved by another practice with a less discriminatory effect.

Should the deep, wide, Color of Money **CRA Protest Complaint** Investigation find from the evidence data- the Media reality – that **Third Coast Bank** has placed **99%** of its advertising and marketing with the general and Anglo Media and places only **1%** of advertisements with the black American owned, operated and oriented Media and that **Third Coast Bank does not have a single annual advertising** or marketing contract with a single entity of the black American owned or operated or oriented Media Newspaper, Radio, TV or Internet

Should the deep, wide, Color of Money **CRA Protest Complaint** Investigation find from the evidence data that this advertising and marketing placement action and practice by **Third Coast Bank** has the requisite disparate impact and disproportionate discriminate effect on the protected class of black Americans and establishes liability under the FHA Final Rule and under ECOA **Effects Test**; forms the case for non-compliance and violation of the **ECOA**; forms the case for violation the **CRA** due to the unequal investments in advertising and marketing and forms the case for violation of the holding in the governing Court cases of TDHCA V ICP, Inc. US V Midland States Bancorp and **US V Chevy Chase FSB**

That where **Third Coast Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests that the **Illegal Discrimination Claim** of illegal discrimination in equal advertising is certified as true and that it be notated in the official investigation report that in the **equal advertisements and equal investments** in same between the Anglo and general owned and operated Media in the neighborhoods in the Anglo Zip Codes and the black American owned and operated Media and the neighborhoods in the Zip Codes of the protected class of black Americans that **Third Coast Bank**– is in violation of the ECOA and FHA – **Final Rule**

In the **Lending categories** that follow that state that **Third Coast Bank** is engaged in practices, actions and policies that deny Equal lending to the protected class of black Americans. These practices, policies, and actions by **Third Coast Bank result** in illegal discrimination in lending – and does not meet the Banks' duties under the **FHA Final Rule**.

### **Home Improvement / Equity Loans**

Should the deep, wide, Color of Money **banking Complaint** investigation find from the evidence that **Third Coast Bank** has originated the vast majority (**95%**) of its home improvement loans outside of the black American Neighborhoods and in the majority Anglo neighborhoods and less **than 5%** in the neighborhoods of the protected class of black Americans –This practice has the disparate impact and the disproportionate discriminate effect on the protected class of black Americans in **the black American Neighborhoods** – and pursuant to the FHA Final Rule establishes the *prima facie* case for disparate impact under the FHA Final Rule and for disproportionate discriminate effect under the ECOA.

Pursuant to its responsibilities under the FHA Final Rule **Third Coast Banks'** compelled to provide the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests – and that these interest – where legitimate- could not be achieved by another practice with a less discriminatory effect – and to otherwise justify this stark and glaring disparity and denial of equal home improvement loans to the neighborhoods of the protected class of black Americans?

Should the deep, wide Color of Money **CRA Protest Complaint** investigation find from the evidence that this action and practice in regard to **Third Coast Bank** practice and policies of home improvement lending has a disproportionate discriminate effect on the protected class of black Americans and establishes the *prima facie* case for illegal discrimination pursuant to the FHA Final Rule and **ECOA Effects Test**; forms the case for illegal discrimination in residential real estate related transactions in violation of **Section 805 of the Fair Housing Act**; forms the case for illegal discrimination against applicants for credit transactions in violation of the **ECOA** and forms the case for violation of the holdings in the governing case of **US V Chevy Chase FSB**

That where **Third Coast Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests that the **Illegal Discrimination Claim** of illegal discrimination in home improvement lending is certified as true and that it be notated in the official investigation report that in the of the equal marketing, soliciting and making of **home improvement loans between** the Anglo neighborhoods in the

Anglo Zip Codes and the black American neighborhoods in the Zip Codes of the protected class of black Americans that **Third Coast Bank**– is in violation of the ECOA and FHA – Final Rule.

### **Business Lending/Lines of Credit /Loans**

The Claim in the **CRA Protest Complaint** states and finds from the evidence data – the reality of which neighborhoods, addresses and Zip Codes the **Third Coast Bank** business loans are made to and to whom the business loans are made to – that **Third Coast Bank** has made the overwhelming majority of its business loans – upwards of **90%** in the Anglo neighborhoods and to the Anglo owned and operated businesses – both in terms of the amount of applications and approvals and in terms of the sheer larger amounts and has not made the corresponding business loans or investments in marketing and promotion of same in the neighborhoods and Zip Codes of the protected class of black Americans. This practice has the disparate impact and disproportionate effect on the protected class of black Americans in Houston and is liable under the FHA Final Rule and under the ECOA, respectively.

Pursuant to the FHA Final Rule **Third Coast Bank** is legally obliged to provide the legally sufficient justification to prove that this practice is necessary to achieve one or more of the Bank's legitimate substantial nondiscriminatory interests and that these interests – where legitimate – could not be achieved by another practice with a less discriminatory effect – and to otherwise justify this horrific disparity and denial of business loans and credit products and marketing and promotion of same to the black American owned and operated businesses in the neighborhoods and Zip Codes of the protected class of black Americans.

Should the deep, wide, Color of Money **CRA Protest Complaint** investigation find from the evidence that this action and practice of **Third Coast Bank** with regard to **business lending** and lines of business credit has the disparate impact and disproportionate discriminate effect on the protected class of black Americans and establishes the **prima facie** case for illegal discrimination pursuant to the **FHA Final Rule** and **ECOA Effects Test**; forms the case for illegal discrimination against the protected class of applicants with respect to credit transactions in non-compliance and in violation of the **ECOA** and forms the case for violation of the rulings in the governing case of **US V Chevy Chase FSB** ---the Illegal Discrimination is established.

That where **Third Coast Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' **legitimate, substantial nondiscriminatory interests** that the **Illegal Discrimination Claim** of illegal discrimination in business lending is certified as true and that it be notated in the official investigation report that in the equal marketing, soliciting and

making of **business loans between** the Anglo owned and operated businesses in the neighborhoods in the Anglo Zip Codes and the black American owned and operated businesses in the neighborhoods in the Zip Codes of the protected class of black Americans that **Third Coast Bank** – is in violation of the ECOA and FHA - Final Rule.

### **Commercial and Construction Lending/Loans**

The Illegal Discrimination Claim states that **Third Coast Bank has** denied the equal marketing, promoting, and making of the Commercial and Construction lending to the black American Neighborhoods in the specified Zip Codes where **Third Coast Bank** does business and has placed 95% of lending in this category outside of the black American Neighborhoods. This continuing practice has the disparate impact and the disproportionate discriminate effect on the protected class of black Americans and establishes liability under the FHA Final Rule and under the ECOA.

Pursuant to its responsibilities under the **FHA Final Rule** **Third Coast Bank** is legally obliged to provide the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests – and that these interests – where legitimate – could not be achieved by another practice that has a less discriminatory effect.

Should the deep, wide, color of Money **CRA Protest Complaint** investigation find from the evidence data that – the reality of which neighborhoods and applicants **Third Coast Bank** made the **vast majority** of its commercial and construction loans – that **99%** of **Third Coast Bank's** commercial and construction lending was made **outside** of the neighborhoods of the Zip Codes of the protected class of black Americans with less than this percentage made to any black American contractors in the Zip Codes of the protected class of black Americans – both in the terms of the **number** of applications and approvals and in the **amounts** and sizes of the commercial and construction loans

Should the deep, wide, Color of Money **CRA Protest Complaint** investigation find from the evidence that this action and practice in **Third Coast Bank's** commercial and construction lending has the disparate impact and disproportionate discriminate effect on the protected class of black Americans and forms the prima facie case for illegal discrimination pursuant to the **FHA – Final Rule** and the **ECOA Effects Test**; forms the case for illegal discrimination against the protected class of black Americans with respect to credit transactions in non-compliance and in violation of the **ECOA** and forms the case for violation of the ruling in the governing cases of TDHCA V ICP, Inc., US V Hudson City Savings Bank FSB and **US V Chevy Chase FSB** -----

That where **Third Coast Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests the **Illegal Discrimination Claim** of

illegal discrimination and redlining in commercial and construction lending is certified as true and that it be notated in the official investigation report that in the equal advertising, promotion and making of commercial and construction loans between the Anglo neighborhoods in the Anglo Zip Codes and the black American neighborhoods in the Zip Codes of the protected class of black Americans that **Third Coast Bank** – is in violation of the ECOA and FHA – **Final Rule**.

### **Bank Financed Developments**

The Claim in the **CRA Protest Complaint** states from the evidence data - **geographical reality** - that **99% of Third Coast Banks**’ bank financed developments - stores, restaurants, hotels, apartments complexes supermarkets, office towers and luxury mixed use complexes are placed in the neighborhoods of the Anglo Zip Codes with no corresponding bank financed developments made in the neighborhoods in the Zip Codes of the protected class of black Americans – this practice has the disparate impact on the protected class of black Americans in Houston?

Pursuant to its responsibilities under the **FHA Final Rule** **Third Coast Banks** legally obliged to provide the legally sufficient justification to prove that this practice is necessary to achieve one or more of the Banks’ legitimate substantial nondiscriminatory interests –and that these interest – where legitimate – could not be achieved by another practice with a less discriminatory effect and to justify this glaring, stark disparity and overwhelming reality of the placements of its bank financed developments – between the two sets of Zip Codes?

Should the deep, wide, Color of Money **CRA Protest Complaint** investigation find from the evidence that this action and practice in **Third Coast Bank** bank financed developments and in its vast majority placement in the Anglo neighborhoods has the **disproportionate discriminate effect** on the protected class of black Americans and forms the *prima facie* case for disparate impact FHA – Final Rule and illegal discrimination pursuant to the ECOA **Effects Test**; forms the case for illegal discrimination against the protected class of black Americans with respect to credit transactions in non-compliance and in violation of the **ECOA** and forms the case for violation of the ruling in the governing case of **US V Chevy Chase FSB and US V Hudson City Savings Bank**

That where **Third Coast Bank** fails to provide the legally sufficient justification to prove that this practice is necessary to achieve one or more of the Banks’ legitimate substantial nondiscriminatory interests - that the **Illegal Discrimination Claim** of illegal discrimination and redlining in Bank Financed developments - and its **95%** placement in the Anglo neighborhoods is certified as true and that it be notated in the official investigation report that in the equal making of **bank financed developments between**

the Anglo neighborhoods in the Anglo Zip Codes and the black American neighborhoods in the Zip Codes of the protected class of black Americans that **Third Coast Bank**– is in violation of the ECOA and FHA – **Final Rule**

### **Community Development Loans**

The Claim in the **CRA Protest Complaint** states that the neighborhoods and Zip Codes of the protected class of black Americans are denied the equal investments of Community Development loans and that **98% of PCB's** Community Development loans are made in the Anglo neighborhoods and Zip Codes – to the detriment of the black American neighborhoods and should the evidence further find that the neighborhoods of the protected class of black Americans are aggrieved by the **Disparate Treatment** from **Third Coast Bank** that any “Community Development” loans are limited to the servicing of rehabilitation sewer holes and detoxification cesspools and for a “wider array of homeless services” that does not develop or revitalize the community in the least – as opposed to the Community Development loans that revitalize the communities in the Anglo Zip Codes. **Third Coast Bank** has not developed a single Hi Tech Center, Apprenticeship Facilities or Neighborhood Center in a single black American Neighborhoods.

Pursuant to its responsibilities under the FHA Final Rule **Third Coast Banks** legally obliged to provide the legally sufficient justification to prove that this practice is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests –and that these interests could not be achieved by another practice with a less discriminatory effect - to otherwise justify this wide disparity – number, size and amounts - and different standards for Community Development loans made between the two sets of Zip Codes of Anglo and black Americans

Should the **CRA Protest Complaint** investigation find from the evidence that this policy, action and practice in **Third Coast Bank** Community Development Loans and in its vast majority placement in the Anglo neighborhoods and in its different standards for the neighborhoods of the protected class of black Americans has the disparate impact and the **disproportionate discriminate effect** on the protected class of black Americans and forms the *prima facie* case for illegal discrimination pursuant to the FHA Final Rule and pursuant to the **Effects Test**; forms the case for illegal discrimination against the protected class of black Americans with respect to credit transactions in non-compliance and in violation of the FHA and of the **ECOA** and forms the case for violation of the ruling in the governing case of **US V Chevy Chase FSB** -----

That where **Third Coast Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests that overcomes the statutes and laws

cited above - that the **Illegal Discrimination Claim** of illegal discrimination in **Community Development Loans** - and its **vast majority** placement in the Anglo neighborhoods is certified as true and that it be notated in the official investigation report that in the equal making of **Community Developments Loans between** the Anglo neighborhoods in the Anglo Zip Codes and the black American neighborhoods in the Zip Codes of the protected class of black Americans that **Third Coast Bank**– is in violation of the **ECOA and FHA - Final Rule**

### **Promotion of Loan/Credit Products**

The Claim in the **CRA Protest Complaint** state that **Third Coast Bank** has deliberately failed to promote the Loan and Credit products in the neighborhoods of the protected class of black Americans and to actively seek to do business in these same neighborhoods the same way that **Third Coast Bank** does in the neighborhoods of the Anglo Zip Codes – and should the evidence illuminate further that **Third Coast Bank** has failed to promote even the basic banking services, credit services, Bank branches in the neighborhoods in the protected class of black Americans – but that **Third Coast Bank** displays giddy enthusiasm in promoting the “expanded suite of specialty commercial loan products”, “wider array of credit services” and “loan products to the Anglo neighborhoods in the Anglo Zip Codes – this practice has the disparate impact on the protected class of black Americans.

This deliberate failure to market and failure to penetrate the black American Neighborhoods in Houston is in direct violation of the controlling authority of the Court ruling in US V Midland States Bancorp.

Pursuant to **FHA Final Rule** **Third Coast Bank** is legally obliged to provide the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Bank’s legitimate substantial nondiscriminatory interests and that these interest – where legitimate –could not be achieved by another practice with a less discriminatory effect – to otherwise legally justify this two world difference – that happens to demarcate by race and Zip Codes - in the promotion of loan and credit products **between** the neighborhoods of the protected class of black Americans and in the Anglo neighborhoods in the Anglo Zip Codes?

Should the **deep, wide CRA Protest Complaint** investigation find from the evidence that this policy, action and practice in **Third Coast Bank Promotion of Loans / Credit Products** and in its vast majority placement in the Anglo neighborhoods and with no corresponding promotion of loan and credit products in the neighborhoods of the protected class of black Americans has the **disproportionate discriminate effect** on the protected class of black Americans and forms the *prima facie* case for illegal

discrimination pursuant to the FHA Final Rule and pursuant to the **Effects Test**; forms the case for illegal discrimination against the protected class of black Americans with\respect to credit transactions in non-compliance and in violation of the **ECOA** and forms the case for violation of the ruling in the governing case of **US V Chevy Chase FSB -----**

That where **Third Coast Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests that overcomes the statutes and laws cited above - that the **Illegal Discrimination Claim** of illegal discrimination in the equal Promotion of Loan / Credit Products - and its **99%** placement in the Anglo neighborhoods with disregard and deliberate denial of same for the neighborhoods of the protected class of black Americans is certified as true and that it be notated in the official investigation report that in the equal servicing of **Promotion of Loan / Credit Products** **between** the Anglo neighborhoods in the Anglo Zip Codes and the black American neighborhoods in the Zip Codes of the protected class of black Americans that **Third Coast Bank**– the Illegal Discrimination Claim stands and the Bank is in violation of the ECOA and of the FHA **Final Rule**

### **Informational Banking Services**

Should the deep, wide, Color of Money **CRA Protest Complaint** Investigation find from the evidence data that the households and businesses in the neighborhoods of the protected class of black Americans are aggrieved by the denial of equal right of the direct mailings and solicitations that **Third Coast Bank** freely makes available to the households and businesses in the neighborhoods of the Anglo Zip Codes and should the evidence further disclose that **Third Coast Bank** policy – limits the direct mailings and solicitations to the neighborhoods that are adjacent and nearby the **Third Coast Bank** branches – and since **Third Coast Bank** discriminates against the black American Neighborhoods in placement of Bank branches the Informational servicers, direct mailings and solicitations cannot be equal – this practice has the disparate impact on the protected class of black Americans Pursuant to the FHA Final Rule **Third Coast Bank** is legally obliged to provide the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests – and to otherwise justify this policy of direct mailings and business solicitations that denies the equal direct mailings and solicitations for business to the neighborhoods of the protected class of black Americans?

Should the deep, wide, Color of Money **CRA Protest Complaint** investigation find from the evidence that this policy, action and practice in **Third Coast Bank** direct mailings and solicitations where **99%** of its direct mailings go to the households and businesses

in the Anglo neighborhoods and with no corresponding direct mailings and solicitations to the households and businesses neighborhoods to the protected class of black Americans has the **disproportionate discriminate effect** on the protected class of black Americans and forms the *prima facie* case for illegal discrimination pursuant to the **Effects Test**; forms the case for illegal discrimination against the protected class of black Americans in non-compliance and in violation of the **ECOA** and forms the case for violation of the ruling in the governing cases of **US V Hudson City Savings Bank FSB** and **US V Chevy Chase FSB** -----

That where **Third Coast Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests that overcomes the statutes and laws cited above - that the **Illegal Discrimination Claim** of equal **Informational Banking Services** - and its **99%** of direct mailings and solicitation placement in the Anglo neighborhoods with disregard and deliberate denial of same for the neighborhoods of the protected class of black Americans is certified as true and that it be notated in the official investigation report that in the equal servicing of **Informational Banking Services** between the Anglo neighborhoods in the Anglo Zip Codes and the black American neighborhoods in the Zip Codes of the protected class of black Americans that **Third Coast Bank** is in violation of the ECOA and of the **FHA Final Rule**

### **Real Estate Related Transactions**

The Claim states that **Third Coast Bank** is engaged in the continuing practice of denying the Equal Real Estate Related Transactions to the black American Neighborhoods. This practice has the disparate impact and the disproportionate discriminate effect on the protected class of black Americans and establishes liability under the **FHA Final Rule** and under the **ECOA**.

Should the deep, wide Color of Money **CRA Protest Complaint** Investigation find from the evidence that **Third Coast Bank** has originated the vast majority (**85%**) of its real estate related transactions outside of the black American Neighborhoods in the majority Anglo neighborhoods in the Anglo Zip Codes and less than 5% in the majority neighborhoods of the protected class of black Americans ----this practice has the disparate impact on the protected class of black Americans in the black American Neighborhoods

Pursuant to its responsibilities under the **FHA Final Rule** **Third Coast Bank** is legally obliged to provide the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Bank's legitimate substantial nondiscriminatory interest and that these interests – where legitimate – could not be achieved by another practice with a less discriminatory effect – and to

otherwise legally justify this overwhelming stark and glaring disparity and denial of equal real estate related transactions in the neighborhoods of the protected class of black Americans?

Should the **CRA Protest Complaint** investigation find from the evidence that the policies, action and practices of **Third Coast Bank** home mortgage lending has a disproportionate discriminate effect on the protected class of black Americans and establishes the case for illegal discrimination pursuant to the **Effects Test**; forms the case for illegal discrimination in residential real estate related transactions in violation of **Section 805** and **Section 804** (a) of the **Fair Housing Act**; forms the case for illegal discrimination against applicants for credit transactions in violation of the **ECOA** and forms the case for violation of the holdings in the governing case of **US V Chevy Chase FSB**.

That where **Third Coast Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests that the **Illegal Discrimination Claim** is certified as true and that it be notated in the official investigation report that in the equal marketing, soliciting and making of home mortgage loans between the Anglo neighborhoods in the Anglo Zip Codes and the black neighborhoods of the protected class of black Americans that **Third Coast Bank– is in violation of the ECOA and FHA Final Rule**

### **Working Capital Loans**

The Claim states that **Third Coast Bank** is engaged in illegal discrimination in the marketing, promotion and making of its Working Capital Loans and has placed 95% of its Working Capital lending outside of the black American Neighborhoods. This practice has the disparate impact and the disproportionate discriminate effect on the protected class of black Americans

Should the deep, wide Color of Money **CRA Protest Complaint** Investigation find from the evidence that **Third Coast Bank** has failed and refused to promote, market and to **make** the Working Capital Loans available to the businesses in the neighborhoods of the protected class of black Americans and has made 99% of its Working Capital Loans to the business neighborhoods in the Anglo Zip Codes – with reckless disregard for the rights of the protected class of black Americans in the black American Neighborhoods in the specified Zip Codes – this practice has the disparate impact and the disproportionate discriminate effect on the protected class of black Americans.

Pursuant to its responsibilities under the FHA Final Rule **Third Coast Bank** is legally obliged to provide the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Banks' legitimate

substantial nondiscriminatory interests and that these interests – where legitimate – could not be achieved by another practice with a less discriminatory effect – and to otherwise justify this stark, and glaring disproportionate disparity between the two sets of Zip Codes with respect to working capital loans?

Should the banking **CRA Protest Complaint investigation** find from the evidence that this action and practice in **Third Coast Bank** making available its **Working Capital Loans** and its vast majority placement in the businesses of the Anglo neighborhoods with no corresponding equal Working capital Loans made to the businesses of the protected class of black Americans has the disproportionate discriminate effect on the protected class of black Americans and forms the *prima facie* case for illegal discrimination pursuant to the **Effects Test**, forms the case for illegal discrimination with respect to credit transactions in non-compliance with and in violation of the **ECOA** and forms the case for violation of the holding in the governing case of **US V Chevy Chase FSB**

That where **Third Coast Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests that overcomes the statutes and laws cited above – that the **Illegal Discrimination Claim** of denial of equal **Working Capital Loans** made between the two sets of Zip Codes is certified as true and that it be notated in the official investigation report that in the equal Promotion, Marketing and Making of Working Capital Loans between the businesses in the neighborhoods in the two sets of Zip Codes in Houston that –the Illegal Discrimination Claim stands and the Bank is in violation of the ECOA and FHA – Final Rule.

### **Bridge Loans**

The Complaint states that **Third Coast Bank** has denied the Equal marketing, promotion and making of the Bridge Loans to the individuals and businesses of the protected class of black Americans and that this continuing practice has the disparate impact and disproportionate discriminate effect on the protected class of black Americans.

Should the deep, wide Color of Money **CRA Protest Complaint** Investigation find from the evidence that **Third Coast Bank** has failed and refused to promote, market and to **make** the Equal Bridge Loans available to the businesses in the neighborhoods of the protected class of black Americans and has made 99% of its **Bridge Loans** to the business neighborhoods in the Anglo Zip Codes – with reckless disregard for the rights of the protected class of black Americans in the black American Neighborhoods in the specified Zip Codes where **Third Coast Bank** does business.

**Third Coast Bank** is legally compelled pursuant to its responsibilities under the FHA Final Rule to provide the legally sufficient justification to prove that this practice challenged in the Complaint is necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests – and that these interests- where legitimate – could not be achieved by another practice with a less discriminatory effect – and to otherwise legally justify this stark, and glaring disproportionate disparity between the two sets of Zip Codes with respect to Bridge loans?

Should the **CRA Protest Complaint** find from the evidence that this action and practice in **Third Coast Bank** making available its **Bridge Loans** and its vast majority placement in the businesses of the Anglo neighborhoods with no corresponding equal Bridge Loans made to the businesses of the protected class of black Americans has the disparate impact and the disproportionate discriminate effect on the protected class of black Americans and forms the *prima facie* case for disparate impact under the FHA Final Rule and for illegal discrimination pursuant to the ECOA **Effects Test**, forms the case for illegal discrimination with respect to credit transactions in non-compliance with and forms the case for violation of the controlling authority in the governing cases of **US V Hudson City Savings Bank** and **US V Chevy Chase FSB**.

That where **Third Coast Bank** fails to provide the legally sufficient justification to prove that the challenged practice is necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests – that overcomes the statutes and laws cited above – that the **Illegal Discrimination Claim** of denial of equal **Bridge Loans** made between the two sets of Zip Codes is certified as true and that it be notated in the official investigation report that in the equal Promotion, Marketing and Making of Bridge Loans between the businesses in the neighborhoods in the two sets of Zip Codes where **Third Coast Bank** does business that **Third Coast Bank**– is in violation of the ECOA and FHA – to include the Final Rule

Claimant petitions that where the independent Agency investigation by **The FRB- pursuant to its sworn duties** finds that the policies, actions and practices of **Third Coast Bank** has the disparate impact under the **FHA Final Rule** and the disproportionate discriminate effect on the protected class of black Americans pursuant to the ECOA **Effects Test** and/or has the Disparate Impact and Disparate Treatment and/or is illegal discrimination perpetrated against the protected class of black Americans and where **Third Coast Bank** fails to answer the **Illegal Discrimination Claims** directly as in legally sufficient justifications and **fails to refute the Claims with evidence** and with the whole truth - that **The FRB-** take the following actions with respect to **Claimant Banking Complaint** –

--that the **Third Coast Bank** CRA Rating be downgraded to **Needs to Improve** and that any and all applications be denied pending the "raising" of the CRA Rating

--that the Claimant be granted a full hearing to present the just cause for the **Third Coast Bank** CRA Rating to be downgraded to "Needs to Improve"

--that the New Bank Branch Application submitted by **Third Coast Bank** be taken out of expedited processing and be placed in **indefinite suspension** pending the full investigation into the CRA Protest Complaint by the FRB

--that the **New Bank Branch Applications** submitted by **Third Coast Bank** be denied with **no possibility** of re-application until **Third Coast Bank** establishes full and favored presence in the black American Neighborhoods in the black American Neighborhoods in the metropolitan assessment areas where SunTurst does business – and fully resolves all of the outstanding Claims in Claimant's complaints and pending findings from the investigations

--that **Third Coast Bank** be barred from submitting any Bank Applications – expansionary or otherwise – to the **Federal Reserve Bank** unless and until the Bank has made the broad remedial measures as called for by the **Fair Housing Act** for the full reclamation of equal rights denied to the protected class of black Americans – Robust Capitalized Measures (RCM) and gets in compliance with the banking laws to include the FHA Final Rule

--that the **corrective Fines**- minimum **\$500 Million Dollars** be imposed on **Veritex Bank**

--that **Cease-and-Desist Orders** be imposed on **Third Coast Bank** to correct, fix, and end the continuing practices and actions (and –non-actions) that continue the pattern of disparate impact and disproportionate discriminatory effects on the protected class of black Americans in Houston MSA and in Dallas Texas markets

-- that **Commitment Orders** imposed against **Third Coast Bank**

--that the **Sanctions, Penalties, Monitoring** be imposed against **Third Coast Bank** at the **FRB** level

--that the case be referred to the **Department of Justice –Civil Rights Housing and Civil Enforcement** for full civil actions

--that the case be referred to the **Department of Housing and Urban Development** for civil actions

### **Totality of Policies and Practices**

Should the deep, wide, Color of Money **CRA Protest Complaint and banking complaint Investigation** find from the evidence data that the **totality of the policies**,

actions (and non-actions) and practices of **Third Coast Bank** pursuant to the **Illegal Discrimination Claims** outlined by Claimant constitute:

- a pattern and practice that the practices and actions (and non-actions) of the Bank manifests **disparate impact** and disproportionate **discriminate effect** on the protected class of black Americans
- a pattern of resistance to full enjoyment of rights of the protected class of black Americans secured by the **CRA, ECOA, Fair Housing Act – to include the Final Rule, Title VIII 1968 Civil Rights Act**
- a pattern that denies these equal rights to the protected class of black Americans
- a pattern of violations and non-compliance of the **CRA, FHA – to include the Final Rule, ECOA, FTC Act, HMDA** – Section 5, Federal Reserve Regulation B, Title VIII of the 1968 Civil Rights Act, Equal Protection Clause – 14<sup>th</sup> Amendment – US Constitution and of the rulings in the governing case of **US V Chevy Chase FSB**

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Where **Third Coast Bank** fails to provide the legally sufficient justification to prove that the practices challenged in the **Illegal Discrimination Claims** are necessary to achieve one or more of its legitimate substantial nondiscriminatory interests justify the stark and glaring realities – geographical and otherwise- of its policies, actions and practices that result in the disparate impact and in the disproportionate discriminate effect on the protected class of black Americans **inside** of the 21 specified Zip Codes in Houston as outlined in Claimants' **Illegal Discrimination Claims** – that the **Illegal Discrimination Claims** stands and are certified as true by the Agency – and that the broad remedial enforcement actions be imposed against **Third Coast Bank**.

**In The Relentless Pursuit of Justice,**

**Barry Simmons**

**Renaissance Indexes Group**

5615 Chimney Rock Road – Suite # 455

Houston, Texas 77081

[Rendexes@gmail.com](mailto:Rendexes@gmail.com)

(832) 258-3040

AUGUST 15, 2015

This letter is part of the **RIG Complaint** File that outlines the racial and Zip Codes divisions in Houston. The banking complaints highlight the entrenched systemic, pervasive and continuing illegal discrimination, redlining and denial of equal access to capital – as a direct result of the **Bank lending and credit policies** – of whole neighborhoods of the protected class of black Americans by the Banks named in the **RIG** banking complaints.

The specific neighborhoods that are aggrieved by the **Bank lending and credit policies** that deny the equal access to capital and credit and result in the disproportionate discriminate effect perpetrated against the protected class of black Americans in **Houston** are:  
**77004,77003,77076,77074,77020,77035,77013,77029,77026,77023,77054,**  
**77016,77093,77033,77009,77022,77018,77043,77006,77093, 77081 and 77021.**

These neighborhoods suffer from the discriminatory effect of the bank policies that **denies equal access to Capital** – the very capital that is needed to make these neighborhoods whole. The black Americans in these **Zip Codes** are further aggrieved by the Banks deliberate refusal to solicit business and refusal to advertise the loan products and to provide the banking services in these neighborhoods – the way it does for the Anglo Zip Codes. Beyond this these neighborhoods are denied the equal **Bank branches – free-standing edifices- and** bank financed developments that stabilize neighborhoods. The citizens in these Zip Codes also are aggrieved by the unequal availability of mortgages, home equity loans and business loans and by the **Disparate Treatment** from these Banks.

The comparative neighborhoods – Anglo Zip Codes – that benefit not only from a disproportionate number of Bank branches – free-standing edifices – but also from the Bank officers actively seeking out the citizens and businesses in these Zip Codes to make sure all of their capital and credit needs are met. The Zip Codes favored by these Banks are:

**77024,77063,77380,77098,77087,77057,77007,77019, 77024, 77025,**  
**77090,77027,77009,77042,77494,77076,77077, 77377, 77065, 75521**  
**77002,77041,77008,77056,77478,77058,77046,77062,77067,77030,77092,77304,77384,77546**  
**, 77079 77401,77060,77065,77345 77339, 77346, 77388, 77505 and 77055.** In these neighborhoods' developers have received millions of dollars in signature loans and lines of credit with little or no collateral- similarly situated black American developers are denied same and prospective Anglo home-owners are not relegated to the more costly loans the way similarly situated black Americans are

Where the homebuyers in the Anglo neighborhoods request home equity loans to maintain their property values the banks not only immediately grant these loans but have waived whatever credit marks to guarantee loan approval. Where business owners in the Anglo Zip Codes apply for loans and lines of credit the Banks counsel the applicants and waive credit marks to get the business loans approved. As no such counseling or waiver by the Banks is granted to the black American applicants the first set of Zip Codes suffer disproportionately as a result of the Bank policies. Negative credit marks are not a “**death sentence**” for the Anglo Zip Codes the way the same credit marks are for the protected class of black Americans in the first set of Zip Codes.



June 7, 2024

**CONFIDENTIAL TREATMENT REQUESTED**

Ms. Karen Smith (*via FedEx*)  
Director, Mergers and Acquisitions  
Banking Supervision  
Federal Reserve Bank of Dallas  
2200 N. Pearl Street  
Dallas TX 75201

Re: Application by Third Coast Bank, Humble, Texas, to establish a branch at 800 Gessner, Houston, Texas 77024

Dear Ms. Smith:

This letter and the attached information are in response to the email correspondence submitted by Mr. Barry Simmons, Renaissance Indexes Group, of Houston, Texas ("RIG"), dated May 3, 6, and 9, 2024 (the "RIG Letters").<sup>1</sup>

Third Coast Bank ("Third Coast" or the "Bank") is committed to full compliance, both in letter and spirit, with the fair lending laws and regulations consisting of the Equal Credit Opportunity Act, 15 U.S.C. §1691 *et seq.*, and the Fair Housing Act, 42 U.S.C. §3601 *et seq.* This compliance is not only because of the Bank's legal requirements to do so, but because the Bank believes it is simply the right thing to do. Third Coast's policies and procedures strictly prohibit discrimination of any protected class. To demonstrate Third Coast's commitment to fair lending, attached are the following documents:

- A copy of Third Coast's 2022 Community Reinvestment Act Performance Evaluation (the "CRA PE") performed by the Federal Reserve Bank of Dallas (the "Reserve Bank") is attached as Appendix A. The CRA PE includes the Reserve Bank's assessment of Third Coast's activities during the period, with a focus on Third Coast's small business lending. The Reserve Bank determined that Third Coast's overall rating was "Satisfactory" as well as its Lending Test and Community Development Test.
- Third Coast's Community and Corporate Social Responsibility Plan, attached as confidential Exhibit 1

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<sup>1</sup> Third Coast Bank recognizes that the May 9 correspondence from RIG was not timely submitted to the Reserve Bank. Nevertheless, this letter addresses the issues raised in the May 9 correspondence.

- Third Coast's CRA Dashboard and Philanthropy Report, attached as confidential Exhibit 2

The attached information demonstrates that Third Coast has always taken its responsibilities related to the Community Reinvestment Act and fair lending seriously and that Third Coast does not discriminate. Rather, Third Coast works hard and is fully committed to ensuring that the credit needs of the communities the Bank serves are met.

#### CRA Assessment Area, Branch Strategy and Distribution

Third Coast seeks to attract members of all communities to consider the Bank for their banking services. The Bank has designated entirety of the Houston-The Woodlands-Sugar Land Metropolitan Statistical Area (the “MSA”) as its CRA assessment area (the “Assessment Area”). This decision to define the MSA as the Bank’s Assessment Area was designed, in part, to ensure that no low-and-moderate income (“LMI”) or majority-minority census tracts (“MMCTs”) were excluded or neglected. The Bank’s Assessment Area is large relative to the Bank’s asset size and location of its branch network. As of March 31, 2024, the Bank had 17 branches and total assets of approximately \$4.7 billion.

Third Coast is a community bank with a focus on building and maintaining long-term relationships with small and mid-size businesses, professionals, and individuals. Third Coast’s strategy does not include developing a large retail branch network due to its size and the availability of alternative delivery systems that it offers (such as internet banking, mobile banking, and treasury management services).

Management and the Board of Directors (the “Board”) of Third Coast are committed to ensuring that no geographic areas are excluded by branch location decisions. Third Coast’s branch network does not arbitrarily exclude geographic areas.

Third Coast’s geographic distribution of branches is included in the table below.

| Branch Name           | Census Tract | Census tract income level | Census tract minority percentage |
|-----------------------|--------------|---------------------------|----------------------------------|
| Humble (Headquarters) | 2507.01      | Upper                     | 58.69%                           |
| Austin                | 0012.00      | Upper                     | 25.72%                           |
| Beaumont              | 0003.12      | Upper                     | 51.58%                           |
| Conroe                | 6942.08      | Middle                    | 26.77%                           |
| Dallas                | 0073.01      | Upper                     | 9.58%                            |
| Detroit               | 9507.00      | Middle                    | 13.18%                           |
| Fort Worth            | 1233.01      | Upper                     | 27.28%                           |

|              |         |          |        |
|--------------|---------|----------|--------|
| Galleria     | 4318.04 | Upper    | 48.07% |
| Georgetown   | 0214.02 | Low      | 50.34% |
| Kingwood     | 2509.01 | Upper    | 30.72% |
| Lake Jackson | 6633.00 | Moderate | 51.16% |
| La Vernia    | 0001.03 | Upper    | 25.53% |
| Mid County   | 0070.04 | Moderate | 73.31% |
| Nixon        | 0005.00 | Middle   | 67.02% |
| Pearland     | 6604.02 | Upper    | 56.83% |
| Plano        | 0316.72 | Middle   | 56.74% |
| San Antonio  | 1101.00 | Middle   | 62.22% |

The breakdown of branch locations by minority percentages is included in the table below.

| Third Coast Branch Location Analysis |                    |                  |
|--------------------------------------|--------------------|------------------|
| Minority Concentration               | Number of Branches | Percent of Total |
| Lowest – 0 to 25%                    | 2                  | 11.7%            |
| Low – >25% to 50%                    | 6                  | 35.3%            |
| High - >50 to 75%                    | 9                  | 53%              |
| Highest - >75%                       | 0                  | 0                |

## Fair Lending Program

Management and the Board are committed to maintaining a comprehensive fair lending program.

### A. Key Fair Lending Policies

Third Coast has implemented the following policies and procedures to ensure fair lending compliance:

- Equal Credit Opportunity Policy
- Fair Lending Policy
- Fair Credit Reporting Act Policy

- UDAAP Policy

Third Coast strives to ensure that its policies are comprehensive and cover all of the elements of the fair lending laws and regulations. Third Coast's training programs focus on the elements and prohibitions included in the fair lending regulations, specifically emphasizing the prohibitions on pre-screening, discouragement and exclusion.

Third Coast's Chief Compliance Officer reviews and approve all Third Coast brochures, marketing sheets, website data and any other printed material to ensure compliance with regulations and guidance; and, in particular, they focus on compliance with fair lending rules and regulations. Management takes steps to ensure that the Third Coast website and other printed materials include images of people of all races, ages, genders, etc. so as not to discourage anyone from applying for credit with Third Coast.

The policies listed above are reviewed and approved by the Board and Risk Committee at minimum on an annual basis.

## **B. Key Fair Lending Procedures and Practices**

In addition to the aforementioned items, Third Coast conducts the following activities to monitor and ensure fair lending compliance:

- **Annual Fair Lending Review** – Third Coast compliance staff prepare an annual fair lending review.
- **Annual Fair Lending and CRA Training for employees, lenders and the Board of Directors**
  - Computer based training required for all staff provided by Chief Compliance Officer, as well as additional ABA training on HMDA
  - The Chief Risk Officer also periodically conducts classroom training for the Board.
  - CRA Officer also periodically conducts training for lending and credit staff
- **Centralized consumer and residential loan underwriting**
  - Established consumer and residential loan underwriting guidelines.
  - Centralized consumer and residential loan rate and terms sheet
  - Management monitoring of exceptions and overrides to underwriting guidelines and published rates. Exceptions and overrides are reviewed by the Risk Committee on a quarterly basis, and a summary report is provided to the Director's Loan Committee monthly.
- **Complaint Management Process** – Third Coast has a complaint management process. Third Coast's Compliance Officer is responsible for maintaining the database of complaints and managing the complaint resolution process. All employees have been directed to send any complaints to the Compliance Officer. Additionally, Third Coast has a complaint form on Third Coast's website for public use or may submit complaints to the call center or in person at one of Third Coast's branches.

## **II. Lending Patterns**

The RIG Letters assert that Third Coast does not make business loans to borrowers or properties located in minority census tracts. This statement is false. Since 2008, Third Coast has made 1,688 loans representing over \$246 million in the specified Zip Codes.<sup>2</sup>

Third Coast uses Ncontracts software for lending pattern data analysis and mapping of the loan portfolio. Small business and small farm loans are mapped on a quarterly basis and reviewed to assess current lending patterns.

Third Coast has 17 branches. Three (3) branches are located in Harris County, one (1) branch located in Collin County, one (1) branch located in Dallas County, one (1) branch located in Tarrant County, one (1) branch located in Travis County, one (1) branch located in Bexar County, two (2) branches located in Jefferson County, one (1) branch located in Montgomery County, one (1) in Red River County, one (1) in Williamson County, two (2) in Brazoria County, one (1) in Gonzales County and one (1) in Wilson County.

### **Zip Code Analysis**

In the RIG Letters, the assertion is made that Third Coast has avoided doing business in the specified Zip Codes. Third Coast has, however, made several loans in the specified Zip Codes, with loans currently outstanding to borrowers or properties located in 16 of the specified Zip Codes that the RIG Letters assert as zip codes in which Third Coast has no loans.

Contrary to the assertions in the RIG Letters, the numbers show that Third Coast does not avoid doing business and making loans in the specified Zip Codes. Third Coast did not include in the response its HMDA report as it only recently became a HMDA reporter in 2022.

## **III. Community Development Activity**

### **A. Community Development Loans**

#### **Community Development Grants and Donations**

Third Coast's community development investments have included charitable donations to entities that serve LMI individuals and communities. The focus of Third Coast's investments and donations is to use Third Coast's funds to provide assistance to nonprofit organizations in the Bank's market areas that provide community services in the way of financial education, small business education, technical assistance to small businesses and organizations serving small businesses, disaster response and recovery and homebuyer education, credit counseling, financial planning and foreclosure prevention. Third Coast recently focused on providing financial literacy training to LMI individuals, with a successful school and adult education program in place. When reviewing a request for a donation, the primary question asked of the entity is the income composition of their clientele rather than the racial makeup. The question of

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<sup>2</sup> The Bank has assumed that the term "specified Zip Codes" refers to the 22 zip codes included in RIG Letters in the document dated August 15, 2015 which was included in the May 6, 2024 Rig Letter.

the racial makeup of the entity's clientele is irrelevant to Third Coast's decision to provide funds, as its focus is on assisting LMI individuals and families, regardless of race.

### **B. Community Development Services**

Community outreach is primarily the responsibility of Third Coast's CRA Department, Market Presidents, Business Development Officers and Loan Officers. Third Coast's Market Presidents are involved in the communities in which their branches are located. Officers work to determine credit opportunities in the community through their community involvement. Many of the service opportunities that Third Coast is involved in are the result of outreach conducted by staff members with business development responsibilities (loan officers, branch staff, etc.). Third Coast also has Volunteer Captains in each branch that identify community development and volunteer activities. Examples of employee involvement include: Participation by one of Third Coast's employees as a Director of the Credit Coalition, which provides credit and homebuyer education counseling; employees that volunteer with The Women's Resource, facilitating financial education; and participation by regional presidents in small business education through such organizations as the Dallas Entrepreneur Center.

### **C. Community Outreach and Marketing**

The RIG Letters alleges that "99% of Third Coast's direct mailings go to the households and businesses in the Anglo neighborhoods..." The RIG Letters cites no data to back-up this claim, because it simply is not true.

Third Coast does not traditionally use radio, TV or newspaper media for advertising and marketing purposes. Much of the marketing that Third Coast is involved in consists of sponsorships of community events, including, among others, charity fundraisers and school events. As previously discussed, Third Coast senior management is engaged in determining credit and other financial opportunities for their communities. Having a diverse workforce, including 68% women, 26.1% Hispanic or Latino and 11.7% African American, which is consistent with, and in some cases exceeds, industry statistics, allows Third Coast to better reach all markets, including but not limited to, the specified Zip Codes.

Third Coast continuously reaches out to small business organizations and has a growing SBA loan program which again demonstrates Third Coast's commitment to small business financing. As a community bank, a large volume of Third Coast's lending is to small businesses, including as a leader in the Paycheck Protection Program ("PPP"). In connection with PPP, Third Coast originated over 5,500 loans, totaling more than \$826 million, with over \$19 million in PPP loans made to small businesses in the specified Zip Codes.

Third Coast management and business development officers make concentrated efforts to reach out to various organizations to see how Third Coast can be involved with community development needs, whether that be through the extension of loans, making of donations or the providing of services.

#### *Request for Confidential Treatment*

Confidential treatment is requested for the information contained in the Confidential version of the response and the exhibits attached thereto pursuant to the Freedom of Information Act, 5 U.S.C. § 552,

Ms. Karen Smith

June 7, 2024

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and regulations promulgated by the Federal Reserve pursuant thereto, 12 C.F.R. Part 261 (collectively, “FOIA”). Such materials have been separately bound and labeled “Confidential.”

The documents for which confidential treatment is requested contain confidential terms of Third Coast’s business methods, policies and procedures, customer data and other confidential information of Third Coast. The information for which confidential treatment is requested is not otherwise available to the public, and public disclosure of this information could have serious adverse effects on Third Coast and could provide a competitive advantage to its competitors. Accordingly, this material is exempt from disclosure to the public pursuant to FOIA.

Third Coast further requests that you advise us in the event disclosure of any summary or portion of this material is contemplated pursuant to a request under FOIA or otherwise, so that Third Coast might supplement or further explain the need for confidential treatment. In addition, to the extent summaries or portions of this material are provided to any third party, Third Coast request that these be prepared in such a way as to assure that the confidentiality of these materials be maintained to the greatest extent possible.

This response is submitted by the undersigned on behalf of Third Coast. If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink that reads "Liz Eber".

Liz Eber  
EVP – Chief Legal Officer

cc:     Commissioner Charles G. Cooper  
          Texas Department of Banking  
          2601 North Lamar Boulevard  
          Austin, Texas 78705-4294

Mr. Barry Simmons  
rendexes@gmail.com

**Federal Reserve Bank**

**ATTN: Karen Smith**

**December 5, 2025**

The Renaissance Indexes Group (Rendexes) files the enclosed CRA Protest Complaint against Third Coast Bank for the Merger Acquisition of Keystone Bancshares and Keystone Bank and to deny Bank Branch Applications on Bee Cave, Texas.

The Complainant is entitled to honest investigations and of robust and remedial enforcement actions against Third Coast Bank.

the FRB is bound by the Fair Housing Act Final Rule and all of the Rules' burden shifting components

-the FRB is also bound by the controlling authority of the applicable Court rulings – which includes US V Chevy Chase, US V Hudson City Savings, US V Midland States Bancorp, US V Guardian Savings Bank, TDHCA V ICP, Inc.

-the FRB is also bound by the Department Rules – HUD FHA Final Rule

This is the Rule of Law that forms the bedrock of our democracy – the FRB personnel was well aware of their sworn duties when they signed up for the FRB. To date the FRB has deliberately failed to enforce the Fair Housing Act Final Rule in any of the RIG Complaints – indeed, the words “Fair Housing Act Final Rule” appear nowhere in any of the letters from the FRB or in any of the FRB Orders.

The FRB does not get to pick and choose which of the banking laws, Court rulings and Department rules that it is going to enforce and which it is going to ignores. The FRB does not get to substitute its subjective and inconsistent judgment for the clearly articulated language of the banking laws.

The FRB is engaged in the sleight of hand of substituting “substantial compliance”, vague statements such as “nothing in the findings to preclude approval of the Banks applications” and “the Bank represents that it has “procedures in place to prevent illegal discrimination” – this failure of execution of sworn duties ends with the RIG Complaints. The banking laws, Court rulings and Department rules are clear – and all call for the Banks to be in **full compliance** of the banking laws and Court rulings and Department rules

These impotent actions of substitution are not part of the FRB’s sworn duties and are outside the scope of the FRBs’ mission: to aggressively investigate the Complaint and

to Enforce the banking laws in the laws' entirety and to impose the effective Agency enforcement actions to end the Bank practices that result in illegal discrimination, redlining and denial of full enjoyment of the rights secured under the banking laws and make whole the aggrieved parties – protected class of black Americans.

Where the FRB fails or refuses to enforce the FHA Final Rule -it is to send the Complaint back with a Letter of Refusal to faithfully execute its sworn duties to enforce the banking laws in the laws' entirety and in the laws full and final perfection

The legal standards to determine the ruling on the Bank Applications are clear: -

-Whether the Bank answered the Claims as framed by the Complainant – in this case specific to the individuals, businesses, households and Neighborhoods of the protected class of black Americans in the specified Zip Codes in Houston and in Dallas.

-Whether the Bank has answered the Illegal Discrimination Claims – as the Claims are framed – directly, truthfully and in accordance with the burden shifting duties of the Fair Housing Act Final Rule

-Whether any of the Banks' practices, policies, actions (and non-actions) result in the Disparate Impact (ECOA) on the protected class of black Americans

-Whether the Bank has marketed, promoted and made the full range of all of its lending and credit products– to include financing to create wealth Real Estate Investment Trusts) and the full range of banking services to the protected class of black Americans

-Whether the Bank has delivered the full enjoyment of all of the advantages of credit and convenience to the protected class of black Americans pursuant to the banking laws, the controlling authority of the oft-cited Court cases

-Whether the Bank has made available the full range of all of the Discretionary Accommodations – banker counseling, waivers of credit marks, overrides – available to all of the black American applicants, homeowners and business owners

-Whether the Bank has made available any product development in any of the black American Neighborhoods in Houston or in Dallas pursuant to the Banks Community Outreach duties

-Whether the Bank has provided the Consumer Financial Education Seminars, Events inside of the black American Neighborhoods in the specified Zip Codes in Houston and in Dallas

Where **Third Coast Bank** continues to place its Bank branches outside of the black American Neighborhoods – to include the last 8 New Branches – it is not in full compliance with the banking laws - CRA and ECOA -. **Third Coast Bank** has made it

clear by its actions that it has no intention of placing any New Bank Branches inside of the black American Neighborhoods at the same pace it places New Bank Branches inside of the Anglo Neighborhoods – as long as the Bank is convinced it is under the full protection of the Federal Reserve Bank in these practices -its violation of the banking laws notwithstanding.

**Third Coast Bank** is either in full compliance with all of the above, with all of the banking laws, with all of the controlling authority of all of the oft cited Court rulings and with all of the Department Rules – in the laws and rules entirety or it is not.

**Third Coast Bank** can either provide the legally sufficient justification (per Claim) to prove that the practices challenged in the Complaint are necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests – and can provide the supporting evidence pursuant to the Banks duties under the Fair Housing Act or Third Coast Bank cannot.

Where **Third Coast Bank** fails – fails to provide the legally sufficient justification to prove that the practices challenged in the Complaint are necessary to achieve one or more of the Banks' legitimate substantial nondiscriminatory interests with the supporting evidence – the Illegal Discrimination Claims stands.

Where the **FRB** cannot vouch for the Banks full compliance with all of the components of the banking laws, Court Rulings and Department Rules – with signed statements and with supporting evidence – the Illegal Discrimination Claims stands.

EXAMPLE – Where the Illegal Discrimination Claim states -and illustrates with geographical distribution and with physical address reality that Central Bank is engaged in practices of illegal discrimination in placing its Bank branches – bricks and mortar free standing edifices – outside of the black American Neighborhoods in Houston and in Dallas – that the last eight New Bank branches - to include the 2 New bank Branches in the present Application – are placed outside of the black American Neighborhoods – this practice is violation of the Community Reinvestment Act and of the Equal Credit Opportunity Act. Such practices are in violation of the controlling authority of the Court ruling in the critical case of US V Hudson City Savings Bank “that such practices deny members of the protected class the equal opportunity to secure credit transactions”

The Agency statements such as “examiners found the retail delivery operations to be in reasonable proximity to LMI communities” do not justify the illegal discrimination practice of Third Coast Bank consistently placing its Bank branches outside of the black American Neighborhoods in Houston, Dallas and other markets.

Where **Third Coast Bank** fails or otherwise cannot fulfill its burden shifting duties under the Fair Housing Act Final Rule – the Illegal Discrimination Claims stands

The **FRB** is to CC the US Congress offices of Lizzie Fletcher at Shirley. Martinez@mail.house.gov and Maxine Waters at Twuan.Samuel@mail.house.gov.

**Federal Reserve Bank**

**Karen Smith**

**December 5, 2025**

**RE: CRA Protest Complaint / Illegal Discrimination Claims – Third Coast Bank**

This letter is part of the continuing communications between the Federal Reserve Bank (FRB) and the **Renaissance Indexes Group** (RIG, Claimant) and forms the CRA Protest Complaint filed against **Third Coast Bank** for full Agency investigations to deny approval of the Merger Acquisition of Lulling Bancshares. Please find the **Illegal Discrimination Claims** (IDC) s.as part of the Complaint against **Third Coast Bank**

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The **Renaissance Indexes Group** respectfully petitions that the (FRB) issue the Agency Directive to **Third Coast Bank** to answer the **Illegal Discrimination Claims** directly, completely, truthfully and honestly – and that the FRB execute its sworn duty and issues the Agency Directive to **Third Coast Bank** to abide by the **FHA Final Rule** – to provide the legally sufficient justification to prove that the practices challenged in the Complaint are necessary to achieve one or more of the Banks' legitimate, substantial nondiscriminatory interests. Where the Bank fails in this burden shifting duty the **Illegal Discrimination Claim(s) stands.**

Even where the Bank meets this burden the Claimant can still prevail by proving that the legitimate substantial nondiscriminatory interest that the Bank is bound by can be achieved by another practice with a less discriminatory effect on the protected class of black Americans.

Neither the FRB nor **Third Coast Bank** has the right to **ignore** the FHA Final Rule – or any of the banking laws in this CRA Protest Proceeding.

Where **Third Coast Bank** fails in this duty – for whatever reason – the **Illegal Discrimination Claims** stands – and the Agency is duty bound to certify the Claim and to impose the Agency enforcement actions on **Central Bank**.

Where the FRB **fails or refuses** to impose and to enforce the **FHA Final Rule** – and the other banking laws – in this Complaint – please send the Complaint back and do not go forward with it- as there would be no point in going forward without the full Agency enforcement of all of the components of the FHA Final Rule in the laws' entirety and in

the laws' full and final perfection. This continued failing and refusal of the FRB to enforce the FHA Final Rule in the law's entirety denies the full Due Process of the **honest enforcement** that the Claimant is entitled to – and worse, enables the Bank to continue its practices, patterns, policies, actions (and non-actions) that result in the illegal discrimination perpetrated against the protected class of black American and the continued redlining of whole black American Neighborhoods in the specified Zip Codes in Houston.

The **Renaissance Indexes Group** will need the petition to enforce the FHA Final Rule answered before sending the Complaint to **Third Coast Bank**. **Third Coast Bank** is legally bound by the duties under the FHA Final Rule to provide the legally sufficient justification per Illegal Discrimination Claim.

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The CRA Protest Complaint is filed under the banking laws

- Community Reinvestment Act -Equal Credit Opportunity Act, Fair Housing Act – to include the Final Rule, Home Mortgage Disclosure Act, Fair Lending Laws, FTC Act – Section 5, Regulation B/ C
- under the controlling authority of the applicable Court rulings – US V Chevy Chase FSB, US V Hudson City Savings Bank, US V 1<sup>st</sup> American Bank, US V Midland States Bancorp and TDHCA V ICP, Inc (Supreme Court case codifying the FHA Final Rule)
- under the Civil Rights laws – Title VIII – 1968 Civil Rights Act
- under the Department rules the HUD Fair Housing Act Final Rule p- and US V Midland States Bancorp
- under the Constitutional laws – Equal Protection Clause – 14<sup>th</sup> Amendment -United States Constitution

Pursuant to the **FHA Final Rule** the prima facie case for illegal discrimination is established. The Complainant and the Complaint establishes that the Bank practices, policies and actions (and non-actions) of **Third Coast Bank** results in the disparate impact on members of the protected class of black Americans.

The burden shifting duty of **Third Coast Bank** is such that must provide the legally sufficient justification to prove that the Bank practices challenged in the Complaint are necessary to achieve one or more of the Banks' substantial legitimate nondiscriminatory interests and that these interests and that these interests – where proven legitimate – could not be served by another practice with a less discriminatory effect.

Where **Third Coast Bank** fails in the burden shifting duty the **Illegal Discrimination Claims** stands – and Agency enforcement action is to be imposed – and since the Complaint is filed, *inter alia*, under the Fair Housing Act the Agency enforcement action must be remedial and robust and places the aggrieved parties -protected class of black Americans – in the position they would have been in if not for the continuing Bank practices of illegal discrimination perpetrated against the protected class of black Americans.

The prima facie case for illegal discrimination is further established pursuant to the **Equal Credit Opportunity Act** Effects Test – which is the method of assessing the discriminatory impact of supposedly neutral credit policies and states clearly

“That the party alleging illegal discrimination need only establish that the action in question has a disproportionately discriminate effect on members of a protected class. And I therefore discriminatory in effect”.

These are the legal standards by which the Agency investigation is supposed to be conducted by – not lobbying softball questions at the named Bank and accepting whatever “answer” the Bank sends back.

As stated in other Letters written at other times the FRB does not have to conduct the investigation – just send the RIG a letter of refusal and I will move my case on.

Where the FRB chooses to conduct the investigation, we petition that the Agency send the **Agency Directive** to **Third Coast Bank** to answer the Illegal Discrimination Claims directly, completely, honestly and in accordance with the faithful execution of sworn duties under the banking laws and in accordance with the above prima facie case standards

The Claimant petitions that the following rights be honored by the FRB

The Rights to honest Investigations to include independent Agency investigations where the FRB findings are independent of the Banks’ “response”. “addressing”, “replies” and “representations”. The overarching theme in the RIG Complaints outlines where Third Coast Bank has structured its business in such a way as to avoid the credit needs of the individuals, households and businesses of the protected class of black Americans in the black American Neighborhoods in Houston MSA.

Rights to comparative analysis of the banking categories – between the two sets of Zip Codes outlined in the Complaint. Neither the **FRB** nor **Third Coast Bank** has the right - to reframe the Complaint to suit its own purposes and then to offer up an “addressing” to the reframed Claim.

-to bring in outside minority census tracts or other LMI tracts that are all outside of the specified Zip Codes in the Complaint-to hold the protected class of black Americans to a lowered and lesser standard **of full enjoyment of Equal rights** secured under the banking laws – US V 1<sup>st</sup> American Bank- and to use this unequal and unlawful standard to get **Third Coast Bank** off on the Claims

The comparative analysis between the two sets of Zip Codes is to be certified for what it is and it is either **Equal** or it is not. Where the IDC s state that the black American Neighborhoods have been discriminated against by **Third Coast Bank** and are denied the Equal bank branches, the equal bank financed developments and the equal community development loans – and where the **physical address reality** confirms these Claims the truth is what it is.

Where the IDC states that the individuals, businesses and households in the black American Neighborhoods are discriminated against in the Equal lending of **Central Banks**' range of lending and credit products – **business lending** - to include start-up, working capital and bridge loans, **mortgages** to include perks as in Skip Payment Privileges , Graduated Payment Mortgages, and **home equity** loans to include full lines of credit and where the **geographical dollar amounts** in these three lending categories confirms these Claims the truth is to be certified for what it is.

Where the IDC states that **Third Coast Bank** has discriminated against the black American Neighborhoods and Media in denial of Equal advertisements, marketing, promotions and outreach of its lending and credit products and where the dollar amounts expenditures verify these Claims the truth of the Claims are what they are and are to be confirmed as such.

The protected class of black Americans in the specified Zip Codes are either entitled to the **full enjoyment of Equal rights** secured under the CRA, ECOA, FHA – to include the Final Rule, Fair Lending Laws, Title VIII – 1968 Civil Rights Act and secured under the Equal Protection Clause – 14<sup>th</sup> Amendment – US Constitution – or **they are not.** Operating under these New Standards to make the determinations is

Has the protected class of black Americans received and are receiving the full enjoyment of Equal rights secured under the above banking laws and other enumerated laws?

Where **Third Coast Bank** refuses, fails or does not answer the Claim directly and fails to present the legally sufficient justification to prove that the practices challenged in the Complaint – **Illegal Discrimination Claims** – are necessary to achieve one or more of the Banks' legitimate substantia interests – and that these interest – where legitimate – could not be achieved by another practice with a less discriminatory effect. The Banks legally sufficient justification must be supported with evidence and cannot be

speculative or hypothetical – in any attempt to justify the stark disparities in the above the Claim and where **Third Coast Banks'** answers are not consistent with the findings of the independent FRB investigation the Claims are too certified for what they are.

The RIG CRA Protest Complaint outlines the violations of the banking laws: **CRA, FHA- to include the Final Rule, ECOA, Regulation B, FTC Act – Section 5 and HMDA – FTC Act – Section 5** and violations of Title VIII – 1968 Civil Rights Act and of the Equal Protection Clause – 14<sup>th</sup> Amendment – US Constitution. The banking complaint outlines the systemic, pervasive and continuing **redlining, illegal discrimination and denial of equal access** to capital perpetrated against the **protected** class of black Americans - as direct result of the entrenched **policies, patterns and actions** of **Third Coast Bank**.

The RIG CRA Protest Complaint outlines illegal discrimination pursuant to the **Effects Test** which states as follows:

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--the party alleging illegal discrimination need only establish a prima facie case by showing that the action in question has a disproportionate discriminate effect on members of the protected class, and is therefore discriminatory in effect -----

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Enclosed please find the **Illegal Discrimination Claims** letter that outlines the policies of **Third Coast Bank** and how these policies have the requisite **disproportionate discriminate effect** on the members of the protected class of black Americans.

Claimant reiterates the earlier Petition to the **FRB** that **the Banks named in the RIG banking complaint** be directed to answer the Claims in the RIG banking complaint directly – as in - refute the Claim completely with evidence and that failing a legitimate business necessity reason that the Claim be certified as part of the findings in the investigation report.

The Claimant petitions for and is entitled to honest enforcement and independent FRB investigations – **Third Coast Bank does not get to investigate itself**

#### **RE: Third Coast Bank**

This letter and the enclosed stark and glaring disparities and outright denials of the amounts of capital, number of Bank branches, in-house bank investments, bank financed developments, commercial lending and loan products to include mortgages, home equity and business loans and lines of credit establishes the prima facie case for illegal discrimination, redlining and denial of equal access to capital pursuant to the banking laws, statutes and regulations – against the above-named Bank.

The law – pursuant to the **New Standards** – outlined in the Fair Housing Act – **Final Rule** (2015), US Supreme Court case – **Texas Department of Housing and Community Affairs V Inclusive Communities Properties Inc.**(2015)and **US V Hudson City Savings Bank FSB** (2015) – pursuant to the Complaint calls for the Bank to provide the **legally sufficient justification** to prove that the challenge practice – in this case Illegal Discrimination Claims – is necessary to achieve one or more of the Banks' **legitimate, substantial, nondiscriminatory interests** – and that these interests – where legitimate – cannot be achieved through another practice or action that has a less discriminatory effect. The legally sufficient justification must be supported by evidence and cannot be hypothetical or speculative.

Where the Bank fails in this 3-tiered test the **Illegal Discrimination Claim** stands, the Claim is certified as true and the *prima facie* case for disparate impact, disproportionate discriminate effect on members of a protected class and illegal discrimination is established.

### **Illegal Discrimination Claims**

**Bank Branch Disparities** the **Claim** in the banking complaint is that the Zip Codes and neighborhoods of the protected class of black Americans are systematically denied the free-standing edifices of Bank branches from **Third Coast Bank** that stabilize the communities, attracts the banks' own investments, lead to Bank financed developments, attracts outside investments and lays the groundwork for City and municipal investments. These favorable advantages work to the benefit of the neighborhoods that have the bank branches – **95 %** of which are in the Anglo Zip Codes – but work to the detriment of the neighborhoods denied the free-standing edifices of Bank branches. This **Bank policy** that results in the denial of Bank branches to the black American neighborhoods is not one of business necessity – the only argument available to the Banks. This Bank policy of Bank branch placement has a **devastating, disproportionate discriminate effect** on the black American neighborhoods in that these neighborhoods are denied both the Bank branches and the attendant benefits that come from same. Pursuant to the governing case in **US V Chevy Chase FSB** this action and policy is redlining.

**Mortgage Loans** the **Claim** in the banking complaint is that **Third Coast Bank** illegally discriminates against the protected class of black Americans and denies the equal access to capital for mortgage loans – the higher rejection rate for this loan product is due to the lending and credit policies of these Banks. These Banks set up obstacles that **deny the protected class** its rights of equal access to capital for home equity loans – where the homes of black Americans are appraised differently from the homes in the Anglo neighborhoods; where the state of the community is taken into account to determine approval and where the protected class are denied the favorable benefits of

banker discretion of counseling and waiver of certain credit marks to get their home equity loans approved. Since these banks have a higher approval rate for home equity loans in the neighborhoods where the bank has placed Bank branches – the deliberate policy to **deny** black American neighborhoods equal (in some cases no Bank branches) has a devastating effect on the approval of home equity loans in the black American Zip Codes. The few mortgage loans that are made to the protected class of black Americans come saddled with higher interest rates, with higher fees and denial of any of the banker discretionary benefits as in deferments on repayments. This Bank policy is **Disparate Treatment** of black Americans – which is in violation of the banking laws. This lending and credit policy by these Banks has a disproportionate discriminate effect on the protected class of black Americans – and establishes the *prima facie* case for illegal discrimination – pursuant to the **Effects Test** **Third Coast Bank** illegally discriminates against the protected class of black Americans are denied the **Equal** access and approvals for business loans and lines of credit in both the number of business loans and in the amounts - that are needed to stabilize, develop and to revitalize the neighborhoods. The black American businesses are also denied the equal advertising and promotion of business loans as well. This Bank policy -- to refusal to finance the businesses in the black American neighborhoods – both existing and start-ups - is the worst kind of **Disparate Treatment** and forms the worst kind of redlining and is in violation of the banking laws. The Banks also refuse to seek out black American businesses – as in direct mailings and solicitations- for the loan packages in the same way that it does for the Anglo businesses in the other set of Zip Codes. The black American applicants are denied the wide **banker discretion** of counseling and waiver of credit marks to get their business loans approved in the same way the banks accommodate the Anglo businesses. The few business loans that these Banks do make to the protected class are piecemeal pittances by comparison and come with higher interest rates, denial of any banker discretion of deferments: more onerous late payment penalties and the black American applicants are required to put up larger amounts of collateral. These Bank **policies** form the disproportionate discriminate effect on the protected class of black Americans and establish the *prima facie* case for illegal discrimination – pursuant to the **Effects Test**. While **these Banks** are willing to loan black Americans **\$50,000** to buy an expensive vehicle it will not loan black Americans the same **\$50,000** to go into business or for a credit line for an existing business. This is the very kind of subtle and sophisticated illegal discrimination that **The FRB** must be on lookout for.

**Bank Investment Disparities** the **Claim** in the banking complaint is that the black American neighborhoods are denied the equal in-house investments that **Third Coast Bank** makes in the Anglo Zip Codes. The policies that go into the decisions on where to make the Bank investments are not based on any legitimate business necessity. As part of the sophisticated illegal discrimination the Banks make policy decisions that **deny** the

black American neighborhoods the free-standing edifices of Bank branches – then makes further policy decisions to limit its Bank investments to the neighborhoods where the Bank **has placed the bank branches** – with the net result of the Anglo neighborhoods receiving 95% of the Banks investment – to the detriment of the neighborhoods in the black American Zip Codes that were denied Bank branches.

The net effect of this deliberate bank policy is that the Bank investments enriches, stabilizes and attracts other investments to the neighborhoods in the Anglo Zip Codes – with a **reckless disregard** for the rights of equal investment in the black American neighborhoods. This Bank policy denies the protected class all of the favorable advantages and benefits that come with Bank investments and is **Disparate Treatment**. This Bank policy has the disproportionate discriminate effect on the members of the protected class – and is pursuant to the **Effects Test** – illegal discrimination.

**Bank Financed Developments** The **Claim** in the banking complaint is that the black American neighborhoods in the 21 Zip Codes that are redlined by **Third Coast Bank** are denied the equal bank financed developments investments that **Third Coast Bank** makes in the Anglo Zip Codes. This sophisticated form of (illegal) discrimination follows the same patterns and is formed by the same Bank policy that places the Bank financed **developments – stores, hotels, restaurants, retail outlets, mixed use luxury complexes** – only where the Bank has made earlier policy decisions to place the Bank branches and where the Bank has made its own in-house investments I. e. the Anglo neighborhoods. The Bank policy decisions on where to place the **Bank financed developments** are not based on any **legitimate business necessity argument**. As part of the sophisticated illegal discrimination the Banks make policy decisions that deny the black American neighborhoods the free-standing Bank branch edifices and the Banks' own in-house investments and then make further Bank **policy decisions to limit the placement** of the Bank financed developments in the Zip Codes where the Bank has Bank branches and Bank in-house investments.

**The net result of this Bank policy is that 95% of the bank financed developments are placed in the Anglo Zip Codes** – this Bank policy displays a reckless disregard for the equal rights of the protected class of black Americans and is **Disparate Treatment** of same

Beyond this the Bank financed developments supports the businesses and properties in the Anglo Zip Codes with no corresponding bank financed developments to support the businesses and properties in the black American Zip Codes. As a direct result of this Bank policy these neighborhoods are denied the **equal investments** of capital of bank financed developments, are denied the stabilizing effects and are aggrieved by the wreckage of neighborhoods that are denied Bank financed developments.

**Commercial Building Loans Disparities** The Claim in the banking complaint is that the black American neighborhoods are denied the equal access to capital and equal capital outlays in the form of commercial building loans. The clear majority – 95% - of the **Third Coast Bank** commercial building loans are made in the Anglo Zip Codes and go to support the businesses and properties in the Anglo Zip Codes with no corresponding commercial building loan support for the businesses and properties located in the 21 Zip Codes of the protected class. The banks' lending and credit policy on this matter is such that it provides the capital for the commercial building loans in those neighborhoods and Zip Codes with "higher demand".

The fatal defect of this argument is that the Banks' **earlier** lending and credit **policies** are what caused the "higher demand" in the Anglo Zip Codes in the first place. The Banks' earlier and initial policies to deliberately place the vast majority **95%** of all of its Bank branches, in-house investments and bank financed developments in the Anglo Zip Codes is what caused the "higher demand" now for commercial building loans. The bank now hides behind this policy of "higher demand" to deny the protected class of black Americans in the redlined Zip Codes their rights of equal access to capital and to continue to enrich and to stabilize the neighborhoods in the Anglo Zip Codes.

This bank policy is not one of **business necessity** – the bank would not go out of business where it made the same equal access to capital and the same **Equal** capital outlays for commercial building loans in the 21 Zip Codes of the protected class of black Americans. This policy greatly benefits the citizens, businesses and property owners in the Anglo Zip Codes. This lending and credit policy, however, has a devastatingly disproportionate discriminate effect on the protected class of black Americans.

**Advertising/Marketing Disparities** The Claim in the banking complaint is that the black American Media and the black American citizens are aggrieved by the denial of equal investments in the advertising and marketing of the **Third Coast Bank's** loan products and banking services, from the denial of direct mailings and of solicitations by these Banks – both in the dollar amounts and in the number of advertisements. This disparity is part and parcel of the overall denial of equal access to capital and denies the protected class the equal knowledge and the equal benefits of the loan products. This Bank policy – to **place 99%** of the Bank advertisements in the Anglo general media and in the Anglo business and community newspapers – is not based on any legitimate business necessity on the part of the Banks. The supporting evidence for the redlining charge against these Banks is manifested in the Bank advertising policy and in the fact that the **black American Media is excluded** from the Bank advertising campaigns. The bank named in the RCG banking complaints have never signed full advertising contracts with the black American owned and operated Media – to include newspapers, radio, TV or Internet. **The Bank does not have a single full advertising contract with any black American owned and operated newspaper, radio station or TV in**

Houston. The result of this policy of exclusion of equal marketing and advertising dollars and number of advertisements in the black American Media is that the black Americans are not made aware of the loan products and banking services that the Banks offers or of any Bank promotions – and are in effect denied the equal treatment by these Banks.

The vast and glaring disparities in advertising between these two sets of Zip Codes reveals that the Banks prefers one (Anglo Zip Codes) over the other (black American Zip Codes). Since the differences in the amounts of investments in advertising between these two racially distinct areas of **Houston** is so stark and glaring this in and of itself is redlining and illegal discrimination as pursuant to the holdings in the governing case of **US V Chevy Chase FSB**. This advertising disparity also results in the disproportionate discriminate effect on the protected class of black Americans and establishes the case for illegal discrimination pursuant to the **Effects Test**. There is no legitimate “business necessity” argument to legally justify this brand of discriminatory actions.

**Community Development Loans.** The Claim in the banking complaint is that the protected class of black Americans in the neighborhoods of the 21 Zip Codes in **Houston** are denied the equal investments in community development loans by **Third Coast Bank**. That 90% of these **Banks**’ community development dollars are placed in the Anglo Zip Codes – to the detriment of the 21 Zip Codes of the protected class – is the very kind of disproportionate discriminate effect that the forms the *prima facie* case for illegal discrimination pursuant to the **Effects Test**. What meager efforts **Third Coast Bank** makes in this regard are based on different standards for what constitutes community development – while **these Banks** is willing to make community development loans available for rehab cesspools, detoxification sewer holes and “affordable housing” in the neighborhoods of the protected class of black Americans it will not and has made any community development loans or investments for high-tech **Centers**; apprenticeship Academies to train machinists or welders or for gleaming Neighborhood Centers for neighborhood improvements.

**Bridge Loans** The Claim in the banking complaint is that the protected class of black Americans - both businesses and homeowners - is aggrieved by the denial of equal access to Bridge Loans from **Third Coast Bank**– both in the dollar amounts and in the number of Bridge Loans applications and approvals. This disparity is part and parcel of the overall denial of equal access to capital and denies the protected class the equal benefits of the credit and loan products that the banks freely make available to the Anglo neighborhoods in the Anglo Zip Codes. That **90%** or better of the **Bank** bridge loans are made in the Anglo neighborhoods – to the detriment and reckless disregard for the equal rights of the neighborhoods of the protected class of black Americans. This is the very kind of disproportionate discriminate effect on members of a protected class that forms the *prima facie* case for illegal discrimination pursuant to the **Effects Test**; that is violation of the **ECOA** and is violation of the holding in **US V Chevy Chase FSB**

**Working Capital Loans**, The Claim in the banking complaint is that the businesses in the neighborhoods of the protected class of black Americans are denied equal **Working Capital Loans** that **Third Coast Bank** freely make available to the businesses in the Anglo neighborhoods – to the tune of a 95% ratio. This denial – like the other denials – has devastating consequences for the survival – much less the thriving – of the businesses in the black American neighborhoods. The negative impact on the whole community leaves in its wake closed businesses and abandoned shops – a situation not suited to attracting the very kind of private investment needed for a thriving neighborhood. This situation also affects the appraisal of home and property values in the community and makes for an unlivable environment. Beyond this the deliberate denial of **Working Capital Loans** to the protected class of black Americans is the worst kind of redlining and illegal discrimination and is in violation of the banking laws: **CRA, ECOA, Regulation B** and of the ruling in **US V Chevy Chase FSB**

**Bank Discretionary Accommodations** The **Claim** in the banking complaint is that the protected class of black Americans in the neighborhoods of the 21 Zip Codes in **Houston** presently redlined by **Third Coast Bank** is aggrieved by the blanket denial of any of the discretionary accommodations to get their loans and credit lines approved. Yet **these same Banks** freely extends all of the discretionary accommodations to the individual applicants and businesses in the Anglo neighborhoods. This policy and practice by **these Banks** have the requisite disproportionate discriminate effect on the protected class of black Americans most egregious kind of illegal discrimination and has devastating effects on the communities and neighborhoods in the 21 Zip Codes of the protected class of black Americans. The denials of the discretionary banker accommodations include: waivers of credit marks, counseling and overrides.

**Informational Banking Services** – The **Claim** in the banking complaint is that the protected classes of black Americans in the 21 Zip Codes that are presently redlined by **Third Coast Bank** are aggrieved by the blanket denial of the direct mailings, solicitations and pre-approved credit cards that **Third Coast Bank** freely makes available to the Anglo Zip Codes. It is **the Banks'** policy to limit the direct mailings and solicitations for the loan products to the neighborhoods where it has placed Bank branches. As **these Banks** discriminates against the neighborhoods of this class for placement of Bank branches the individuals and businesses are also denied the equal Bank informational services in the same way that **Third Coast Bank** accommodates the individuals and businesses in the Anglo Zip Codes.

**Ascertainment of Credit Needs** The **Claim** in the banking complaint is that the neighborhoods of the protected class of black Americans are denied the equal rights under the **CRA** – for **Third Coast Bank** to take the equal affirmative steps and the equal continuing actions to assess and to meet the credit needs of the individuals; businesses and non-profits. **Third Coast Bank** has not formed any viable and visible

working relations and CRA partners in the black American neighborhoods; has not sponsored any “Meet Your Banker” Galas and has not sponsored any real Financial Literacy Seminars at any Hotels or at any University Halls to accommodate the black Americans in the same way that the Bank does for the Anglo neighborhoods.

**Promotion of Loan / Credit Products** The Claim in the banking complaint is that **Third Coast Bank** has failed to promote the loan and credit products in the neighborhoods of the protected class of black Americans in the same way it does in the neighborhoods in the Anglo Zip Codes. The businesses in the first set of neighborhoods are denied even the basic business loan products – much less the “expanded suite of specialty commercial loan products” and “wider array of credit products” that **Third Coast Bank** presently provides for the businesses in the Anglo neighborhoods in Houston and beyond.

**Overrides/** The Claim in the banking complaint is that the individuals and businesses in the neighborhoods and Zip Codes of the protected class of black Americans are aggrieved by the outright denial of the equal granting of overrides and exceptions to the credit underwriting and pricing policies that **Third Coast Bank** freely grants to the individuals and businesses in the Anglo neighborhoods and Zip Codes in Houston.

**Factoring** The Claim in the banking complaint is that the small businesses owned and operated by the protected class of black Americans are denied and are aggrieved by illegal discrimination in the banking service of factoring (Asset based lending). This is an important banking service offered **Third Coast Bank** and makes the difference between thriving businesses and business failures. **Third Coast Bank** does not promote or advertise this banking service to the protected class of black Americans nor does the Claimant find anywhere in the 21 Zip Codes where **Third Coast Bank** has made this service available to any of the black American small businesses.

### **Loan Product Disparate Treatment**

The Claim in the banking complaint is that the individuals and businesses in the neighborhoods of the protected class of black Americans – **Third Coast Bank**:

--are charged higher rates of interest for the same loans and credit products as similarly situated Anglo applicants in the second set of Zip Codes

--are required to put up larger amounts and sizes of collateral to secure same loans products as similarly situated Anglo applicants and businesses in the second set of Zip Codes

--are denied the equal favorable treatment of deferments on repayments on the loan products as similarly situated Anglo applicants

These actions, practices and policies of the Banks are violations of the banking laws: **CRA, ECOA, FHA** – to include the Final Rule, **Regulation B, FTC Act – Section 5 and HMDA** form the *prima facie* case for illegal discrimination pursuant to the **Effects Test** and is redlining and denial of equal access to capital pursuant of the holdings in **US V Hudson City Savings Bank and US V B/A Countywide US V Chevy Chase FSB**

### **Reverse Redlining**

The **Claim** in the banking complaint is that the individuals and businesses in the neighborhoods and Zip Codes of the protected class of black Americans are aggrieved by the Banks policies, practices, actions (and non-actions) that target this class for “approval” of only the most toxic, exploitative and high-cost loan and credit products – this includes everything from business, home equity, mortgages, auto, construction and personal loans and lines of credit.

The actions and policies of **Third Coast Bank** is **Disparate Treatment with Disparate Impact** on the protected class of black Americans and are illegal discrimination pursuant to the **Effects Test** and redlining pursuant to the holdings in **US V Chevy Chase FSB**.

These actions, practices and patterns of **Third Coast Bank** are systemic, pervasive and continuing and will only be corrected by the deep, wide, Color of Money investigation and full prosecution and imposition Fines, Penalties, Sanctions, Monitoring and capital Fund.

**Charitable Contributions The Claim** in the banking complaint is that the Charities and non-profits in the neighborhoods of the protected class of black Americans are denied the charitable contributions; **Third Coast Bank** employee assistance and the Capital Campaigns that **Third Coast Bank** freely makes available for the Non-Profit Corporations in the Anglo Zip Codes. Beyond this outright denial **Third Coast Bank** sets different standards for the pittance that it does make to the black Americans Charities – it is limited to the homeless services; rehabilitation cesspools and detoxification sewer holes for a class of degenerates that does not revitalize the community. In the Anglo Zip Codes **these Banks** makes much larger donations to Charities that actually stabilize the neighborhoods.

As all three parties to this action are bound by the **laws** and in pursuit of the whole **truth** the Bank must not be allowed to “address” or otherwise dance around the Claim in the banking complaint. To this end Claimant petitions that **Third Coast Bank** is to be directed to answer the Claim directly – as in **YES** or **NO** – as in refute completely with evidence and with legitimate business necessity argument. The Claim is either true or it is not.

**Disparate Treatment** – the protected class of black Americans are denied the equal rights of equal treatment by **Third Coast Bank**. AS the individual bankers within these Banks have wide discretion and the granting – or denial – of this discretion makes all of the difference in the granting or denial of credit. The black Americans are denied the **counseling** by these Banks and are denied any **waivers** of credit marks; denied the **banker discretion** to get their loans approved; denied the opportunity for signature loans; denied the equal knowledge of the loan products or of any special promotions due to the Banks policy **to not advertise** in the black American Media; denied the direct mailings and solicitations. This is failure to provide equal information services. AS there is no legitimate “business necessity” argument for these policies and actions that deny equal rights to black Americans and as these policies have a disproportionate discriminate effect on the protected class this establishes the case for illegal discrimination – pursuant to the **Effects Test**. These policies are all the more egregious in that the courts have ruled that this action – **Disparate Treatment** – is intentional discrimination because the difference in treatment on this prohibited basis has no credible non-discriminatory explanation.

**Redlining** The black Americans in the 21 Zip Codes in **Houston** and the in the 26 Zip Codes in Dallas are aggrieved by the policies and actions of these banks and suffer redlining where the Banks practices make for **unequal** access to capital and credit; **unequal** access to the information services; **unequal** access to banking services and **deliberately deny** the protected class the same favorable treatment that the Bank freely extends to the Anglo population in the second set of Zip Codes. The black American neighborhoods are also aggrieved by revers redlining – where the Bank only makes available the high-cost toxic loan and credit products.

**Disparate Impact** the black Americans are further aggrieved by **Third Coast Bank's** seemingly neutral lending and credit policies because these Bank policies disproportionately excludes and places undue burdens on the protected class – as in minimum home mortgage amounts which places the purchase of a home out of reach of the black Americans; as in years long relations with the local Banks to get approved for loan products – the black Americans could not have had the same years' long relations with the Banks as the Anglo applicants because the black neighborhoods are denied the bank branches; as in requiring years of experience in owning and operating **wealth creating entities** – stock brokerage houses, trading companies and private equity groups – black Americans **could not have** had the years of experience in these entities because black Americans have historically been denied the equal access to the relatively large amounts of capital needed to own and operate the wealth creating entities in the first place.

**Third Coast Bank** has no credible legally sufficient justification argument to justify the present practices, actions (and non-actions) and policies and actions that result in

**disparate treatment** and have the **disproportionate discriminate effect** on the protected class of black Americans is disallowed in the case of **Disparate Treatment** on a prohibited basis. The “substantial, legitimate non-discriminatory” argument is further disallowed to justify discriminatory Bank policies because the argument is routinely dismissed as a pretext for illegal discrimination and redlining. The *prima facie* case for illegal discrimination is further established due to the disparate impact and disproportionate discriminate effect that the Bank policies have on the members of the protected class – in this case black Americans – pursuant to the **Effects Test**.

The RIG petitions that the **FRB** impose the following against **Third Coast Bank**

--The CRA Rating is downgraded to “Needs To Improve” and be in **indefinite suspension** pending full resolution of the Illegal Discrimination Claims outlined in the RIG CRA Protest Complaint proceedings

-that enforcement actions at the Agency level be imposed – to include

Fines - **\$500 Million Dollars** , Penalties, Sanctions, Commitment Orders that bar **Third Coast Bank** from submitting any Applications – expansionary or otherwise and includes any Merger Acquisitions until such time as **Third Coast Bank** has corrected , fixed and ended the practice, actions (and non-actions), policies that are the direct result of the disparate impact – in violation of the FHA – Final Rule and that result in the disproportionate discriminate effect on members of a protected class – in this case black Americans in the specified Zip Codes of Houston ( and of Dallas) Illegal Discrimination Claims

--that **Third Coast Banks**’ FDIC insurance be canceled, Cease and Desist Orders be imposed, and that Removal Orders be executed against the entire Board to include the chairman and of the senior management.

--that the case be referred to the Department of Justice Civil Rights Division for civil actions to be filed against **Third Coast Bank**

-that the case be referred to the Department of Housing and Urban Development for civil actions to be filed against **Third Coast Bank**

**In The Relentless Pursuit of Justice,**

**Barry Simmons**

**Chairman / RIG**

**[Rendexes@gmail.com](mailto:Rendexes@gmail.com)**

**(713) 483-4101**

# NORTON ROSE FULBRIGHT

December 29, 2025

**Via FED EZ File**

Norton Rose Fulbright US LLP  
2200 Ross Avenue, Suite 3600  
Dallas, Texas 75201-7932  
United States of America

Ms Lindsey Wieck  
Director - Mergers & Acquisitions  
Federal Reserve Bank of Dallas  
2200 N. Pearl Street  
Dallas, TX 75201

Direct line +1 214 855 3906  
mike.keeley@nortonrosefulbright.com  
Tel +1 214 855 8000  
Fax +1 214 855 8200

Re: Third Coast Bancshares, Inc., Humble, Texas to acquire Keystone Bancshares, Inc. and Keystone Bank, SSB, both of Bee Vae, Texas. Keystone Bank, SSB, to merge with Third Coast Bank, Humble, Texas (the "Merger"), and thereby establish branches at the locations of Keystone Bank, SSB's main office and branches

Dear Ms. Wieck

On behalf of our clients Third Coast Bancshares, Inc. and Third Coast Bank ("Third Coast" or the "Bank"), we submit this letter and the attached information are in response to the email correspondence submitted by Mr. Barry Simmons, Renaissance Indexes Group, of Houston, Texas ("RIG"), dated December 5, 2025 (the "Letter") and forwarded to Third Coast by the Federal Reserve Bank of Dallas (the "Reserve Bank") on December 16, 2025.

Third Coast is committed to full compliance, both in letter and spirit, with the fair lending laws and regulations consisting of the Equal Credit Opportunity Act, 15 U.S.C. §1691 *et seq.*, and the Fair Housing Act, 42 U.S.C. §3601 *et seq.* This compliance is not only because of the Bank's legal requirements to do so, but because the Bank believes it is simply the right thing to do.

Third Coast and Keystone are confident that the proposed Merger will enhance and strengthen the ability of the combined institution to serve the banking needs of all consumers and businesses within their combined markets. Third Coast and Keystone are committed to providing continued access to credit in a manner that is fair, equitable, ethical and without discrimination. Third Coast welcomes this opportunity to respond to the concerns expressed by RIG, and to demonstrate how the proposed Merger will result in increased access to more banking products and services for all residents in the markets in which the surviving institution expects to operate.

Third Coast's policies and procedures strictly prohibit discrimination of any protected class. To demonstrate Third Coast's commitment to fair lending, attached are the following documents:

- A copy of Third Coast's Community Reinvestment Act Performance Evaluation, dated August 12, 2024 (the "CRA PE") performed by the Reserve Bank (the "Reserve Bank") is attached as Appendix A. The CRA PE includes the Reserve Bank's assessment of Third Coast's activities during the period, including Third Coast's HMDA data. The Reserve

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Bank determined that Third Coast's overall rating was "Low Satisfactory" as well as its Lending Test and Community Development Test.<sup>1</sup>

While the 2024 CRA PE assigned a "Low Satisfactory" rating based on the Bank's activities during the review period, we have continued to build on that foundation with meaningful enhancements to the Community Reinvestment Act Program (the "CRA Program"). These include expanded community partnerships, increased investments in affordable housing initiatives and targeted initiatives in underserved areas, all designed to further strengthen our commitment to community development and outreach.

The Bank has continued to build on its established program by emphasizing purposeful alignment between community needs, regulatory expectations, and the Bank's commitment to serving its markets effectively.

As part of our ongoing commitment to excellence, we have further strengthened our CRA Program through several key initiatives:

- Expanded our CRA investment strategy with increased participation in Small Business Investment Companies ("SBICs") to support small business growth and economic development.
- Meaningfully enhanced our philanthropic spending, prioritizing organizations that effectively meet identified community needs. Within 2025, the Bank increased its giving and invested a total of \$246,000 in CRA qualified organizations that support LMI individuals or communities as well as small businesses within our assessment areas.
- Substantially increased employee service hours, strengthening on the ground engagement and deepening our community partnerships. Employees collectively contributed 1,017 hours of service. These activities included an increase in board and committee service with community organizations that support LMI individuals and communities, small businesses, and broader community development initiatives.

These efforts build on our established foundation and underscore our dedication to delivering meaningful, lasting impact. As such, we are well-positioned to continue fulfilling the objectives of the CRA and achieving positive results in future evaluations.

- Third Coast's Community Development and CRA Plan 2025, attached as Confidential Exhibit 1.

The attached information demonstrates that Third Coast has always taken its responsibilities related to the CRA and fair lending seriously and that Third Coast does not discriminate. Rather, Third Coast works hard and is fully committed to ensuring that the credit needs of the communities the Bank serves are met.

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<sup>1</sup> Federal Reserve Bank of Dallas, Community Reinvestment Act Performance Evaluation for Third Coast Bank (August 12, 2024).

### CRA Assessment Area, Branch Strategy and Distribution

Third Coast's CRA Assessment Areas ("AAs") are defined in accordance with regulatory requirements and consist of geographies in which the Bank has its main office, branches, and a substantial portion of its lending activity. The Bank's AAs are comprised of whole counties and Metropolitan Statistical Areas ("MSAs"), do not arbitrarily exclude low or moderate-income ("LMI") geographies or majority minority census tracts ("MMCTs"), and reflect the communities where Third Coast conducts the majority of its deposit taking and lending activities. The Bank periodically reviews its AAs to ensure they remain appropriate given changes in the branch footprint, lending patterns, population shifts and economic conditions. The Bank's Assessment Area is large relative to the Bank's asset size and location of its branch network. As of September 30, 2025, the Bank had 19 branches and total assets of approximately \$5.1 billion.

Third Coast's branch strategy is relationship driven and market focused, emphasizing community presence, accessibility, and local decision making rather than high density retail branching. The Bank supplements its physical branch presence with online and mobile banking platforms, allowing customers across all income levels to access deposit, lending, and payment services regardless of physical proximity to a branch. The hybrid delivery approach supports safe and sound growth while ensuring continued access to banking services throughout the AAs. Management and the Board of Directors (the "Board") of Third Coast are committed to ensuring that no geographic areas are excluded by branch location decisions.

Third Coast's geographic distribution of branches is included in the table below, including the proposed branches related to the acquisition of Keystone.

| Branch Name           | Census Tract | Census tract income level | Census tract minority percentage |
|-----------------------|--------------|---------------------------|----------------------------------|
| Humble (Headquarters) | 2507.01      | Upper                     | 58.69%                           |
| Austin                | 0012.00      | Upper                     | 25.72%                           |
| Beaumont              | 0003.12      | Upper                     | 51.58%                           |
| Conroe                | 6942.08      | Middle                    | 26.77%                           |
| Dallas                | 0073.01      | Upper                     | 9.58%                            |
| Detroit <sup>2</sup>  | 9507.00      | Middle                    | 13.18%                           |
| Fort Worth            | 1233.01      | Upper                     | 27.28%                           |
| Galleria              | 4318.04      | Upper                     | 48.07%                           |
| Georgetown            | 0214.02      | Low                       | 50.34%                           |
| Kingwood              | 2509.01      | Upper                     | 30.72%                           |
| Lake Jackson          | 6633.00      | Moderate                  | 51.16%                           |
| La Vernia             | 0001.03      | Upper                     | 25.53%                           |
| Memorial              | 4307.00      | Middle                    | 39.58%                           |
| Mid County            | 0070.04      | Moderate                  | 73.31%                           |

<sup>2</sup> The entire AA meets the definition of a "middle income distressed" census tract that is predominately a middle-income population, characterized by high unemployment, poverty rates, or lack of investment.

|                         |         |        |        |
|-------------------------|---------|--------|--------|
| Nixon                   | 0005.00 | Middle | 67.02% |
| Pearland                | 6604.02 | Upper  | 56.83% |
| Plano                   | 0316.72 | Middle | 56.74% |
| San Antonio             | 1101.00 | Middle | 62.22% |
| The Woodlands           | 6912.01 | Upper  | 19.00% |
| Keystone Branches       |         |        |        |
| Bee Cave (Headquarters) | 0340.00 | Upper  | 39.15% |
| Ballinger <sup>3</sup>  | 9506.00 | Middle | 39.39% |
| Downtown Austin         | 0012.00 | Upper  | 25.72% |

The breakdown of branch locations by minority percentages is included in the table below.

| Third Coast Branch Location Analysis |                    |                  |
|--------------------------------------|--------------------|------------------|
| Minority Concentration               | Number of Branches | Percent of Total |
| Lowest – 0 to 25%                    | 3                  | 14%              |
| Low – >25% to 50%                    | 10                 | 45%              |
| High - >50 to 75%                    | 9                  | 41%              |
| Highest - >75%                       | 0                  | 0                |

## I. Fair Lending Program

Management and the Board are committed to maintaining a comprehensive fair lending program.

### A. Key Fair Lending and adjacent Policies

Third Coast has implemented the following policies and procedures to ensure fair lending compliance:

- o Equal Credit Opportunity Policy
- o Fair Lending Program
- o Fair Lending Policy
- o UDAAP Policy

Third Coast strives to ensure that its policies are comprehensive and cover all of the elements of the fair lending laws and regulations. Third Coast's training programs focus on the elements and prohibitions included in the fair lending regulations, specifically emphasizing the prohibitions on pre-screening, discouragement, and exclusion.

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<sup>3</sup> The entire AA meets the definition of a “underserved middle-income remote rural” census tract that is predominately middle-income population.

Third Coast's Chief Compliance Officer and Chief Legal Officer review and approve all Third Coast brochures, marketing sheets, website data, and any other printed material to ensure compliance with regulations and guidance; and, in particular, they focus on compliance with fair lending rules and regulations. Management takes steps to ensure that the Third Coast website and other printed materials include images of people of all races, ages, genders, etc. so as not to discourage anyone from applying for credit with Third Coast.

The policies listed above are reviewed and approved by the Board and Risk Committee at minimum on an annual basis.

## **B. Key Fair Lending Procedures and Practices**

In addition to the aforementioned items, Third Coast conducts the following activities to monitor and ensure fair lending compliance:

- **Annual Fair Lending Risk Assessment**
  - Third Coast's compliance staff conducts an annual fair lending risk assessment.
- **Annual Fair Lending Training for employees, lenders, and the Board of Directors**
  - Computer-based training required for all staff provided by Chief Compliance Officer, as well as additional ABA training on HMDA.
  - The Chief Risk Officer also periodically conducts classroom training for the Board.
- **CRA Education and Awareness**
  - The CRA and Community Development Officer (the "CRA Officer") serves a pivotal role in delivering targeted education designed to enable employee understanding of CRA requirements and how their roles contribute to meeting the credit and service needs of our communities.
  - Post the evaluation period, the CRA Officer delivers broad service training for employees and leadership, which directly enhanced participation in community and nonprofit board service activities that supports CRA-eligible organizations.
  - The CRA Officer participates in and led internal panel discussions and educational sessions to increase employee awareness of CRA-qualified lending, investment, and service activities. These sessions provide practical guidance on identifying CRA opportunities and proactively incorporating CRA considerations into day-to-day decision making.
  - As a result of these efforts, the Bank has observed increased employee engagement, improved understanding of CRA-eligible activities, and stronger collaboration across business lines to support meaningful community development initiatives.
- **Centralized consumer and residential loan underwriting**
  - Established consumer and residential loan underwriting guidelines.
  - Centralized consumer and residential loan rate and terms sheet.
  - Management monitoring of Policy exceptions to underwriting guidelines and published rates. Exceptions are reviewed by the Board on a quarterly basis.
- **Complaint Management Process**
  - Third Coast has a complaint management process. Third Coast's Chief Compliance Officer is responsible for maintaining the database of complaints and managing the

complaint resolution process. All employees have been instructed to send any complaints to the Chief Compliance Officer. Additionally, Third Coast has a link to submit a complaint to the Texas Department of Banking on Third Coast's website for public use or a complaint may be submitted to our call center or in person at one of Third Coast's branches.

## II. Lending Patterns

The RIG Letter asserts that Third Coast does not make business loans to borrowers or properties located in minority census tracts. This statement is false. Since 2008, Third Coast has made 1,733 loans representing over \$324 million in the specified Zip Codes.<sup>4</sup>

Third Coast has 19 branches. Four (4) branches are located in Harris County, one (1) branch located in Collin County, one (1) branch located in Dallas County, one (1) branch located in Tarrant County, one (1) branch located in Travis County, one (1) branch located in Bexar County, two (2) branches located in Jefferson County, two (2) branches located in Montgomery County, one (1) in Red River County, one (1) in Williamson County, two (2) in Brazoria County, one (1) in Gonzales County and one (1) in Wilson County. Following the Merger, Third Coast will add two (2) branches located in Travis County, and one (1) branch located in Runnels County.

### Zip Code Analysis

In the RIG Letter, the assertion is made that Third Coast has avoided doing business in the specified Zip Codes. However, as previously indicated, Third Coast has made over 1,700 loans in the specified Zip Codes since 2008. Since June of 2024, Third Coast has originated 45 new loans, totaling \$78 million in commitments, to borrowers or properties located in the specified Zip Codes that the RIG Letter asserts as zip codes in which Third Coast has no loans.

Contrary to the assertions in the RIG Letter, the numbers show that Third Coast does not avoid doing business and making loans in the specified Zip Codes. All loans are subject to the same standard underwriting guidelines. The Bank's 2025 HMDA reporting shows that while the Bank only closed on 80 HMDA reportable loans, 17 of the loans were to minority households (approximately 20%), with four of the loans in the specified Zip Codes.

## III. Community Development Activity

### A. Community Development Loans

#### • **Community Development Donations and Investments.**

The Bank's CRA donations and investments are focused on addressing the critical needs of LMI individuals and communities within our AAs. Third Coast's approach prioritizes funding and capital

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<sup>4</sup> The Bank has assumed that the term "specified Zip Codes" refers to the following 22 zip codes: 77004, 77003, 77076, 77074, 77020, 77035, 77013, 77029, 77026, 77023, 77054, 77016, 77093, 77033, 77009, 77022, 77018, 77043, 77006, 77093, 77081 and 77021.

deployment to organizations and initiatives that deliver measurable community development outcomes.

To enhance governance, oversight, and strategic alignment of charitable activities, the Bank established a Philanthropic Council comprised of representatives from multiple lines of business and organizational leadership. The Philanthropic Council provides structured review and oversight of donation requests and is intended to strengthen the impact, consistency, and alignment of the Bank's philanthropic investments with community needs and our CRA program.

CRA qualified donations are directed to nonprofit organizations that serve LMI populations through a broad range of essential services including:

- Financial education and financial capability programs designed to build household stability and long-term economic resilience;
- Small Business Education and technical assistance;
- Affordable Housing initiatives including programs aimed at preventing and addressing family homelessness;
- Food insecurity relief;
- Disaster response and recovery services; and
- Homebuyer education, credit counseling, and foreclosure prevention programs that promote housing stability and sustainable homeownership.

In addition to philanthropic support, the Bank's CRA investment strategy is structured to advance community development through capital investments that benefit LMI communities. These investments include participation in SBIC, mortgage-backed securities and bonds that finance critical projects, including water and utility services and attainable housing developments serving LMI.

When reviewing a request for a donation, the primary question asked of the entity is the income composition of their clientele rather than the racial makeup. The question of the racial makeup of the entity's clientele is irrelevant to Third Coast's decision to provide funds, as its focus is on assisting LMI individuals and families, regardless of race.

- **Community Development Services.**

Third Coast maintains a proactive and intentional CRA Program designed to identify, support, and respond to the evolving needs of the communities it serves. While the overall strategy is established and guided by the CRA Officer, execution of the program is collaborative and Bank-wide, with active participation from Market Presidents, corporate leadership, loan officers, retail teams, volunteer captains, and members of the Board. This shared responsibility ensures that community development services are embedded across all lines of business and reflect both local market conditions and the Bank's broader community development objectives.

Through meaningful involvement in board service, technical assistance, and the delivery of financial education, Third Coast works closely with community partners to better understand local challenges and identify opportunities to expand access to credit and financial services. These activities enable Bank personnel to develop market specific insights into community needs while

strengthening relationships with nonprofit organizations, community development activities, and civic leaders.

Community development services are responsive to a broad range of identified needs, including addressing family homelessness and food insecurity, chairing nonprofit board financial committees, advisory support to loan structuring for Community Development Financial Institution's ("CDFI"), investing in supplemental financial education opportunities for youth, seniors and adults, and strengthening the sustainability and resilience of small businesses.

### **C. Community Outreach and Marketing.**

The RIG Letter alleges that "99% of Third Coast's direct mailings go to the households and businesses in the Anglo neighborhoods..." The RIG Letter cites no data to back-up this claim because it simply is not true.

Third Coast does not traditionally use radio, TV or newspaper media for advertising and marketing purposes. Much of the marketing that Third Coast is involved in consists of sponsorships of community events, including, among others, charity fundraisers, and school events. As previously discussed, Third Coast senior management is engaged in determining credit and other financial opportunities for their communities. Having a diverse workforce, including 67% women, 25.60% Hispanic or Latino and 13.60% African American, which is consistent with, and in some cases exceeds, industry statistics, allows Third Coast to better reach all markets, including but not limited to, the specified Zip Codes.

Our community outreach is focused on strengthening small businesses through strategic collaboration and education. Complementing this work, Third Coast leads targeted small business financial education sessions designed to serve business economic development, build financial capability, and increase awareness of SBA programs, which again demonstrates Third Coast's commitment to small business financing.

Third Coast management and business development officers make concentrated efforts to reach out to various organizations to see how Third Coast can be involved with community development needs, whether that be through the extension of loans, making donations or the providing of services.

### **IV. Response to Allegations in the RIG Letter.**

The RIG Letter appears to allege that Third Coast has engaged various types of discrimination under the ECOA, the FHA and related regulations. For example, the RIG Letter very generally refers to prohibited acts under the ECOA, the FHA, Section 5 of the Federal Trade Commission Act, and the Community Reinvestment Act without providing any evidence for how the Bank may have violated such statutes. Because the RIG Letter does not identify the specific basis for its allegations, it is not possible for the Bank to refute every claim recited in the RIG Letter. However, the Bank believes that: (i) the non-specific allegations described in the RIG Letter are not sufficient to establish even a *prima facie* showing of discrimination under the ECOA or the FHA; and (ii) the few allegations in the RIG Letter which might be relevant to a claim of discrimination are unsupported and are false.

#### A. The RIG Letter Fails to Establish Even a *Prima Facie* Showing Discrimination.

In *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*<sup>5</sup>, the U.S. Supreme Court confirmed the evidentiary standard for a *prima facie* showing in support of certain claims of discrimination.<sup>6</sup> Specifically, the Supreme Court affirmed in *Inclusive Communities* that the party alleging illegal discrimination need only establish a *prima facie* case before the burden will shift to the accused (in this case, Third Coast) to defend the challenged practice.<sup>7</sup> Notably, all of the claims set forth in the RIG Letter are insufficient to establish even a *prima facie* case for discrimination. As explained more fully below, the RIG Letter falls well short of the evidentiary standard required under applicable law.

Pursuant to *Inclusive Communities* and otherwise consistent with applicable standards for proving discrimination under the ECOA, a person claiming discrimination must provide evidence as to a specific policy, procedure, action or omission by the accused that forms the basis of, or results in, the illegal disparity.<sup>8</sup> According to the U.S. Supreme Court, a person who fails to allege facts or produce statistical or other specific evidence demonstrating a causal connection cannot make out a *prima facie* case of discrimination.

The RIG Letter did not provide or identify any specific evidence that could conceivably support a claim of discrimination under the above-described legal standards. The Rig Letter only generally implies that the Bank may discriminate against the protected class of African Americans and that it denies equal access to lending and credit products. However, the RIG Letter did not include true, complete or correct statistical data or other evidence showing that Third Coast at any time actually engaged in the above-described discriminatory conduct. The RIG Letter does not provide any supporting loan or demographic data of the type that is continuously monitored and reviewed by Third Coast and by the Reserve Bank in connection with its CRA evaluations. The RIG Letter does not point to any instance where the Bank treated minority loan applicants in a manner that was inconsistent with non-minority loan applicants. The Bank can only respond to RIG's broad allegations of redlining with the certainty that the Bank has never denied access to credit based on race, nationality, or any other prohibited basis. The Bank's affirmative community efforts, investments, and contributions in its markets, including in minority and low-income areas, overcome any conclusory presumption that the Bank may be avoiding, or denying access to banking services in, those areas.

Each of the various claims alleged in the RIG Letter is legally deficient for the reasons noted above. The RIG Letter does not provide or identify true, complete, or factual evidence indicating that any specific policy, procedure, action, or omission of either Bank is discriminatory. RIG's

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<sup>5</sup> 135 S. Ct. 2507 (2015).

<sup>6</sup> Notably, the Supreme Court in its *Inclusive Communities* decision, was addressing a claim for disparate impact under the Fair Housing Act. While this decision is not binding with respect to all of the claims recited in the Letter, we believe the decision is instructive because the regulatory agencies have adopted a similar standard for claims under the ECOA. Accordingly, we believe a closer review at the actual requirements of the *Inclusive Communities* decision is appropriate in connection with this response.

<sup>7</sup> *Supra* note 5, at 2514-2515.

<sup>8</sup> See, e.g., *Inclusive Communities*, *supra* note 5, at 2523-2524 (noting, in relation to a disparate impact claim, that "[c]ourts must . . . examine with care whether a plaintiff has made out a *prima facie* case of disparate impact and prompt resolution of these cases is important. A plaintiff who fails to allege facts at the pleading stage or produce statistical evidence demonstrating a causal connection cannot make out a *prima facie* case of disparate impact.") (emphasis added).

unsubstantiated allegations of potential discrimination by the Bank are not enough. Moreover, Reserve Bank examiners who have reviewed the lending activity, loan policies and advertising practices of the Bank have consistently found, as concluded in each of the Bank's historical evaluations that there is "no evidence of discriminatory or other illegal credit practices in consistent with helping to meet the community needs was identified."<sup>9</sup>

**B. Potentially Relevant Allegations in the CRA Protest are Not Evidence of Discrimination, are Unsupported and are False.**

In support of its apparent claim that Third Coast engaged in illegal redlining, the RIG Letter focuses primarily on the Bank's physical banking locations. For example, the RIG Letter notes that the Bank does not have any branch locations in majority-minority census. As a preliminary matter, we are not aware of a legal requirement relating solely to physical branch locations, so long as the Bank offers equal access to credit to all qualified borrowers within its reasonably expected market area. In addition, the allegation is misleading in that it fails to acknowledge that 9 locations of the Bank's currently 19 branches are located in a high-minority census tracts that have greater than 50 - 75% minority concentration.

**Request for Confidential Treatment**

Confidential treatment is requested for the information contained in the Confidential version of the response and the exhibits attached thereto pursuant to the Freedom of Information Act, 5 U.S.C. § 552, and regulations promulgated by the Federal Reserve pursuant thereto, 12 C.F.R. Part 261 (collectively, "FOIA"). Such materials have been separately bound and labeled "Confidential."

The documents for which confidential treatment is requested contain confidential terms of Third Coast's business methods, policies and procedures, customer data, and other confidential information about Third Coast. The information for which confidential treatment is requested is not otherwise available to the public, and public disclosure of this information could have serious adverse effects on Third Coast and could provide a competitive advantage to its competitors. Accordingly, this material is exempt from disclosure to the public pursuant to FOIA.

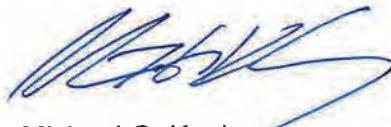
Third Coast further requests that you advise us in the event disclosure of any summary or portion of this material is contemplated pursuant to a request under FOIA or otherwise, so that Third Coast might supplement or further explain the need for confidential treatment. In addition, to the extent summaries or portions of this material are provided to any third party, Third Coast request that these be prepared in such a way as to assure that the confidentiality of these materials be maintained to the greatest extent possible.

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<sup>9</sup> See, *supra*, note 1.

This response is submitted by the undersigned on behalf of Third Coast. If you have any questions, please do not hesitate to contact me.

Very truly yours,



Michael G. Keeley

cc: Bart Caraway (via e-mail)  
Third Coast Bank

Commissioner Charles G. Cooper (via CAFÉ)  
Texas Department of Banking

Commissioner Hector Retta (via e-mail)  
Texas Department of Savings and Mortgage Lending

Mr. J. Mark Love (via e-mail)  
Federal Deposit Insurance Corporation

U.S. Department of Justice (via e-mail)

Mr. Barry Simmons (via e-mail, without Confidential Exhibit)  
Renaissance Indexes Group

# **PUBLIC DISCLOSURE**

August 12, 2024

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Third Coast Bank  
RSSD # 3630323  
20202 Highway 59 North, Suite 190  
Humble, Texas 77338

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

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## INSTITUTION RATING

**Institution's Community Reinvestment Act Rating: Third Coast Bank is rated Satisfactory.**

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

| Performance Levels         | Third Coast Bank 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 good 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 good penetration throughout the AAs.
- The distribution of loans among individuals of different income levels, including low- and moderate-income (LMI) individuals, and businesses and farms of different revenue sizes (borrower distribution) is adequate.
- Third Coast makes an adequate level of qualified community development (CD) loans.
- The bank 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.
- 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 in LMI geographies and/or to LMI individuals.
- Services do not vary in a way that inconveniences the bank's AAs, particularly LMI geographies and/or LMI individuals.
- Third Coast provides an adequate level of CD services.

## INSTITUTION

### DESCRIPTION OF THE INSTITUTION

Third Coast, a financial institution headquartered in Humble, Texas, has the following characteristics:

- Is a wholly owned subsidiary of Third Coast Bancshares, Inc., Humble, Texas.
- Reported total assets of approximately \$4.7 billion and gross loans of \$3.7 billion as of March 31, 2024.
- Operates 17 branch offices and five full-service automated teller machines (ATMs) throughout its seven delineated AAs across the state of Texas as of March 31, 2024.
- Closed one branch location and opened five others since the previous CRA performance evaluation dated April 25, 2022.
- Offers traditional deposit and loan products to meet the needs of the communities it serves.
  - Third Coast is predominately a commercial lender, with commercial loans representing 86.0 percent of its loan portfolio as of March 31, 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.
- 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 the bank's loan portfolio mix as of March 31, 2024.

Table 1

| Composition of Loan Portfolio<br>as of March 31, 2024 |                  |              |
|---|------------------|--------------|
| Loan Type   | \$ (000)         | Percent (%)  |
| Agricultural  | 30,551           | 0.8          |
| Commercial  | 3,222,219        | 86.0         |
| Consumer – Closed-End                                 | 2,043            | <0.1         |
| Consumer – Open-End                                   | 5,299            | 0.1          |
| Residential Real Estate                               | 302,753          | 8.1          |
| Other   | 183,329          | 4.9          |
| <b>Gross Loans</b>                                    | <b>3,746,194</b> | <b>100.0</b> |

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

The Federal Reserve Bank of Dallas rated Third Coast's CRA performance as **Satisfactory** at the previous performance evaluation dated April 25, 2022. The bank was evaluated using the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* and received a **Satisfactory** rating under the lending test and a **Satisfactory** rating under the CD test.

## SCOPE OF THE EVALUATION

Examiners utilized the FFEIC's *Interagency Examination Procedures for Large Institutions* to evaluate the bank's CRA performance. This is the first evaluation of Third Coast's CRA performance as a large institution. While the bank surpassed the large bank asset threshold on January 1, 2022, a full year of data was not available prior to the commencement of the prior evaluation on April 25, 2022; as a result, Third Coast was reviewed using the FFEIC's *Interagency Examination Procedures for Intermediate Small Institutions*. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as AA demographic and economic characteristics, and credit needs. It is noteworthy that Third Coast's assets grew rapidly, increasing by more than \$2.1 billion since the previous evaluation.

Full-scope reviews were conducted for three of the bank's seven delineated AAs. Factors to determine which AAs would receive full-scope reviews include, but are not limited to, the level of the bank's lending, investment, and service activities as well as the availability of opportunities in AAs; comments received from community groups and the public regarding Third Coast's CRA performance; population density; the number of other financial institutions in the AAs; and the length of time since the most recent full-scope review.

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

Table 2

| Assessment Area Name               | Assessment Area Description   | Scope of Review Received |
|------------------------------------|---|--------------------------|
| <b>Full-Scope Assessment Areas</b> |   |                          |
| Houston Metropolitan               | Brazoria, Harris, and Montgomery counties<br>Part of the Houston-The Woodlands-Sugar Land, TX Metropolitan Statistical Area (MSA) | Full-Scope               |
| Beaumont-Port Arthur, TX MSA       | Hardin, Jefferson, and Orange counties<br>Entire Beaumont-Port Arthur, TX MSA   | Full-Scope               |
| Austin Metropolitan                | Williamson County<br>Part of the Austin-Round Rock-San Marcos, TX MSA   | Full-Scope               |
| <b>Limited-Scope AAs</b>           |   |                          |
| Dallas-Fort Worth Metropolitan     | Collin, Dallas, and Tarrant counties<br>Part of the Dallas-Fort Worth-Arlington, TX MSA   | Limited-Scope            |
| San Antonio Metropolitan           | Bexar, Guadalupe, and Wilson counties<br>Part of the San Antonio-New Braunfels, TX MSA  | Limited-Scope            |
| Detroit Nonmetropolitan            | Lamar and Red River counties<br>Nonmetropolitan   | Limited-Scope            |
| Nixon Nonmetropolitan              | Gonzales County<br>Nonmetropolitan  | Limited-Scope            |

This evaluation consists of a review of Third Coast's 2022 and 2023 Home Mortgage Disclosure Act (HMDA) reported mortgage lending data, the 2022 and 2023 CRA small business lending data and the CD loans, investments, and services extended from April 26, 2022 through March 31, 2024, including prior period CD investments. Small business loans carried a heavier weight when assessing the bank's CRA performance given Third Coast's strategic focus on small business lending and the volume of small business lending exceeding the volume of HMDA mortgage lending. Additionally, more consideration was given to the number volume of loan originations than the dollar amount, as this represents the number of individuals or entities served.

Emphasis was also placed on the bank's performance in relation to aggregate lending data rather than in comparison to relevant demographic figures, as aggregate lending data is considered a better proxy of credit demand in a given geography.

The evaluation of Third Coast'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 as well as American Community Survey (ACS) data for each review year. 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 relied 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 performance context.

In conjunction with the evaluation, examiners interviewed members of the community 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**

Third Coast's overall lending test performance is **Low Satisfactory**. The bank's performance across the three AAs receiving a full-scope review was consistent with the overall rating. Greater weight was given to the performance in the Houston Metropolitan AA, as this AA represents the largest portion of the bank's branches, deposits, and lending activity of any AA.

#### **Lending Activity**

This performance criterion evaluates the lending volume considering the bank's resources, business strategy, and other performance context. Third Coast's lending levels reflects good responsiveness to AA credit needs. Table 3 summarizes the lending activity from January 1, 2022 through December 31, 2023. Small business lending makes up a substantial majority of the lending activity reviewed, which is reflective of the bank's strategic focus as a commercial lender.

Third Coast's lending activity decreased from the previous evaluation, which is attributed to raising mortgage interest rates during the review period and the associated decrease in demand for mortgage loans. Additionally, a significant portion of the bank's small business lending during the previous evaluation was comprised of originations made through the Small Business Administration's (SBA's) Paycheck Protection Program (PPP), which was created to aid small businesses to weather the COVID-19 pandemic. The termination of this program in May 2021 removed a source of the bank's lending during the review period. Despite the decrease in total lending, Third Coast's lending volume reflects appropriate responsiveness to the credit needs of its delineated AAs.

During the review period, the bank made limited use of flexible lending practices in serving the credit needs of its AAs. This was demonstrated through small business initiatives and

participation in government-guaranteed lending programs, including approximately \$49.3 million worth of SBA loans originated by the bank between January 1, 2022 and December 31, 2023.

Table 3

| Summary of Lending Activity<br>January 1, 2022 through December 31, 2023 |              |              |                |              |
|--|--------------|--------------|----------------|--------------|
| Loan Type  | #            | %            | \$(000s)       | %            |
| Home Purchase  | 252          | 16.2         | 159,715        | 27.0         |
| Refinancing  | 82           | 5.3          | 50,197         | 8.5          |
| Home Improvement   | 3            | 0.2          | 749            | 0.1          |
| Multifamily  | 18           | 1.2          | 26,334         | 4.5          |
| Other Purpose Closed/Exempt  | 14           | 0.9          | 5,240          | 0.9          |
| <b>Total HMDA-related</b>  | <b>369</b>   | <b>23.8</b>  | <b>242,235</b> | <b>41.0</b>  |
| <b>Small Business</b>  | <b>1,154</b> | <b>74.4</b>  | <b>343,771</b> | <b>58.2</b>  |
| <b>Small Farm</b>  | <b>28</b>    | <b>1.8</b>   | <b>4,672</b>   | <b>0.8</b>   |
| <b>TOTAL LOANS</b>   | <b>1,551</b> | <b>100.0</b> | <b>590,678</b> | <b>100.0</b> |

*Note: Affiliate loans originated or purchased within the bank's AAs are included.  
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 loans extended inside and outside of the bank's delineated AAs. As depicted in Table 4, a high percentage of Third Coast's loans are made within the delineated AAs. The bank's small business loans are generally made in proximity to branch locations, with more than 80 percent located within delineated AAs. The majority of small farms and HMDA loans are originated within the bank's AAs, though a moderate volume is in contiguous counties. Of note, Third Coast originated an appreciable number of loans in Travis County, which was not part of the Austin Metropolitan AA during the review period but was added in April 2024 when the bank opened a branch in the city of Austin.

Overall, the majority of the bank's lending, by number and dollar amount of loans, are made within the bank's delineated AAs.

Table 4

| Loan Type                   | Lending Inside and Outside of the Assessment Areas |             |                |             |                          |             |                |             |
|-----------------------------|--|-------------|----------------|-------------|--------------------------|-------------|----------------|-------------|
|                             | Inside Assessment Areas                            |             |                |             | Outside Assessment Areas |             |                |             |
| #                           | %  | \$(000s)    | %              | #           | %                        | \$(000s)    | %              |             |
| Home Purchase               | 144  | 57.1        | 82,954         | 51.9        | 108                      | 42.9        | 76,761         | 48.1        |
| Home Improvement            | 2  | 66.7        | 385            | 51.4        | 1                        | 33.3        | 364            | 48.6        |
| Refinancing                 | 60   | 73.2        | 33,954         | 67.6        | 22                       | 26.8        | 16,243         | 32.4        |
| Multifamily                 | 11   | 61.1        | 16,082         | 61.1        | 7                        | 38.9        | 10,252         | 38.9        |
| Other Purpose Closed/Exempt | 8  | 57.1        | 2,610          | 49.8        | 6                        | 42.9        | 2,629          | 50.2        |
| <b>Total HMDA-related</b>   | <b>225</b>   | <b>61.0</b> | <b>135,986</b> | <b>56.1</b> | <b>144</b>               | <b>39.0</b> | <b>106,249</b> | <b>43.9</b> |
| <b>Small Business</b>       | <b>959</b>   | <b>83.1</b> | <b>286,207</b> | <b>83.3</b> | <b>195</b>               | <b>16.9</b> | <b>57,564</b>  | <b>16.7</b> |
| <b>Small Farm</b>           | <b>16</b>  | <b>57.1</b> | <b>2,735</b>   | <b>58.5</b> | <b>12</b>                | <b>42.9</b> | <b>1,937</b>   | <b>41.5</b> |
| <b>TOTAL LOANS</b>          | <b>1,200</b>                                       | <b>77.4</b> | <b>424,928</b> | <b>71.9</b> | <b>351</b>               | <b>22.6</b> | <b>165,750</b> | <b>28.1</b> |

*Note: Affiliate loans not included*

The remaining loan distribution analyses discussed in this performance evaluation will consider only those loans originated within the bank's AAs, including affiliate loans.

### ***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 good penetration throughout the delineated AAs.

### ***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. Third Coast'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. Third Coast makes an adequate level of CD loans, considering its capacity and the need and availability of CD opportunities in the delineated AAs. CD loans originated during the evaluation period were extended for a variety of purposes, as noted in Table 5.

During the review period, Third Coast originated 42 qualified CD loans in its AAs, totaling \$174.1 million. The number and dollar amount of the bank's qualified CD lending decreased by approximately 72 percent and 39 percent, respectively, compared to the previous evaluation. The decrease is attributable to the conclusion of the PPP in May 2021. At the previous evaluation, Third Coast made 132 qualified loans through this program, representing 88 percent of the bank's CD loans and more than 95 percent of the total dollar amount of CD lending. While Third Coast was not able to fully replace the activity conducted under the PPP, other CD lending increased notably.

The focus of the bank's CD lending also shifted since the previous evaluation, reflecting responsiveness to the CD needs of the AAs. The majority of Third Coast's CD lending at the previous evaluation was related to the revitalization and stabilization of AA geographies, primarily in response to the COVID-19 pandemic. During this evaluation, the CD lending focused primarily on economic development through financing small businesses, which better aligns with its expertise as a commercial bank. Third Coast's CD lending included loans to local small businesses that allow them to create new or retain existing jobs for LMI residents, loans to start-up businesses in LMI geographies, and a loan to support an auto dealership that provides low-cost financing to LMI individuals who are unable to acquire traditional financing for a vehicle.

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<br>Assessment Area: All |           |                |
|---|-----------|----------------|
| Purpose   | #         | \$(000s)       |
| Affordable Housing                                    | 2         | 1,006          |
| Community Services                                    | 2         | 53,333         |
| Economic Development                                  | 25        | 82,175         |
| Revitalization and Stabilization                      | 13        | 37,584         |
| <b>Total</b>  | <b>42</b> | <b>174,098</b> |

## INVESTMENT TEST

Third Coast's overall investment test rating is **Low Satisfactory**. The bank's performance in the Houston Metropolitan and the Beaumont-Port Arthur MSA AAAs is consistent with the overall rating, while the performance in the Austin Metropolitan AA is lower.

This performance criterion evaluates the bank's level of qualifying investments, grants, donations, or in-kind contributions of property made since the prior evaluation that have a primary purpose of CD. Overall, Third Coast has an adequate level of qualified CD investments and grants, as displayed in Table 6, although is rarely in a leadership position. The bank's overall level of qualified CD investments increased significantly compared to the previous evaluation, with the total number and dollar amount of investments growing by approximately 133 percent and 134 percent, respectively. Third Coast primarily invested in qualified small business investment corporations (SBICs), which reflects the bank's strategic focus as a commercial bank. These SBICs generally engage in broad geographic regions, though the bank targeted investments to organizations dispersing resources in its AAs. Since these SBICs benefit more than one of the bank's AAs, the credit for the investment activity is reflected at the institution level rather than in a specific AA.

The number and dollar amount of qualified CD donations made by Third Coast since the previous evaluation increased by more than 110 percent and 375 percent, respectively. This reflects the bank's commitment to supporting local organizations that provide community services targeted to LMI individuals throughout the delineated AAs. Specific details regarding investments, grants, and donations can be found in the Conclusions with Respect to Performance Tests section for each AA.

Table 6

| Investments, Grants, and Donations<br>Assessment Area: All |  |              |                                     |              |           |            |           |              |
|--|--|--------------|-------------------------------------|--------------|-----------|------------|-----------|--------------|
| Community Development<br>Purpose                           | Prior Period<br>Investments <sup>1</sup> |              | Current<br>Investments <sup>2</sup> |              | Donations |            | Total     |              |
|  | #  | \$(000s)     | #                                   | \$(000s)     | #         | \$(000s)   | #         | \$(000s)     |
| Affordable Housing   | 0  | 0            | 0                                   | 0            | 9         | 23         | 9         | 23           |
| Community Services   | 0  | 0            | 1                                   | 2,500        | 41        | 70         | 42        | 2,570        |
| Economic Development                                       | 4  | 2,271        | 2                                   | 265          | 7         | 25         | 13        | 2,561        |
| Revitalization and Stabilization                           | 1  | 421          | 0                                   | 0            | 4         | 6          | 5         | 427          |
| <b>Total</b>   | <b>5</b>                                 | <b>2,692</b> | <b>3</b>                            | <b>2,765</b> | <b>61</b> | <b>124</b> | <b>69</b> | <b>5,581</b> |

<sup>1</sup> Book value of investment  
<sup>2</sup> Original market value of investment

## SERVICE TEST

Third Coast's overall service test rating is **Low Satisfactory**. The bank's service test performance is consistent across all full-scope AAs.

### ***Retail Services***

This performance criterion evaluates the bank's level of delivery systems provided in each geography classification. Refer to Table 7 for the distribution of banking offices and full-service ATMs by income level of geographies. Third Coast'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**

| Branch and Full-Service ATM Locations<br>Assessment Area: All |                     |                    |                    |           |              |                      |              |
|---|---------------------|--------------------|--------------------|-----------|--------------|----------------------|--------------|
| Tract<br>Income   | % of<br>Geographies | % of<br>Households | % of<br>Businesses | Branches  |              | Full-Service<br>ATMs |              |
|   |                     |                    |                    | #         | %            | #                    | %            |
| Low   | 12.0                | 10.5               | 7.5                | 1         | 5.9          | 1                    | 16.7         |
| Moderate  | 27.4                | 26.2               | 21.6               | 2         | 11.8         | 1                    | 16.7         |
| Middle  | 28.3                | 30.1               | 28.8               | 5         | 29.4         | 2                    | 33.3         |
| Upper   | 30.0                | 32.0               | 40.8               | 9         | 52.9         | 2                    | 33.3         |
| Unknown   | 2.3                 | 1.2                | 1.2                | 0         | 0.0          | 0                    | 0.0          |
| <b>Total</b>  | <b>100.0</b>        | <b>100.0</b>       | <b>100.0</b>       | <b>17</b> | <b>100.0</b> | <b>6</b>             | <b>100.0</b> |

*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, Third Coast provides an adequate level of CD services.

As illustrated in Table 8, bank representatives provided 118 services, totaling 929 hours, to 27 organizations that provide varying levels of community services to LMI individuals and families in the delineated AAs. This level of CD services represents an increase of 26.8 percent in number and 91.5 percent in hours compared to the previous evaluation. Services provided by bank representatives include teaching financial education courses at predominantly LMI schools and districts in the AAs, serving local philanthropic organizations, and on the boards of directors for health care facilities serving LMI populations.

Table 8

| Community Development Services<br>Assessment Area: All |                |             |                     |
|--|----------------|-------------|---------------------|
| Purpose  | Total Services | Total Hours | Total Organizations |
| Affordable Housing                                     | 0              | 0           | 0                   |
| Community Services                                     | 118            | 929         | 27                  |
| Economic Development                                   | 0              | 0           | 0                   |
| Revitalization and Stabilization                       | 0              | 0           | 0                   |
| <b>Total</b>   | <b>118</b>     | <b>929</b>  | <b>27</b>           |

#### FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified. Third Coast 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.

**HOUSTON METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE HOUSTON METROPOLITAN ASSESSMENT AREA**

- The Houston Metropolitan AA consists of portions of the Houston-The Woodlands-Sugar Land, TX Metropolitan Statistical Area (MSA)<sup>1</sup>. The AA includes the entirety of Brazoria, Harris, and Montgomery counties and omits the six remaining counties of the MSA. 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.
- The AA is comprised by 1,326 geographies: 209 low-, 341 moderate-, 345 middle-, 387 upper-, and 44 census tracts with unknown income levels. Since the previous evaluation, 430 additional census tracts were added to the AA and the income level classification of many of the existing tracts changed.
- As of March 31, 2024, Third Coast operated seven banking offices in the AA, including one in a moderate-, one in a middle-, and five in upper-income census tracts.
- According to the June 30, 2023, Federal Deposit Insurance Corporation's (FDIC's) Deposit Market Share Report, the bank holds 1.0 percent of the deposit market share, ranking 13<sup>th</sup> among 97 FDIC-insured financial institutions with offices operating within the AA.
- Interviews with a representative of a local small business development center and a member of the local government focused on the housing in the area provided additional information about the AA, including local economic conditions and credit needs. The community contacts noted that as the area population continues to grow, the need for additional affordable housing becomes more dire.

**Table 9**

| Population Change<br>Assessment Area: Houston Metropolitan |                    |                    |                   |
|--|--------------------|--------------------|-------------------|
| Area   | 2015<br>Population | 2020<br>Population | Percent<br>Change |
| Houston Metropolitan                                       | 5,190,689          | 5,723,619          | 10.3              |
| Brazoria County, TX  | 331,741            | 372,031            | 12.1              |
| Harris County, TX  | 4,356,362          | 4,731,145          | 8.6               |
| Montgomery County, TX                                      | 502,586            | 620,443            | 23.5              |
| Houston-The Woodlands-Sugar Land, TX MSA                   | 6,346,653          | 7,122,240          | 12.2              |
| 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

- The AA population grew between 2015 and 2020 at a rate similar to that of the state of Texas, as displayed in Table 9. While the numerical population of Harris County grew more during the review period, Montgomery County experienced a significantly higher growth rate.

<sup>1</sup> On July 21, 2023, OMB Bulletin No. 23-01 amended the MSA by including San Jacinto County and renaming it as the Houston-Pasadena-The Woodlands, TX MSA. As this alteration was not in effect on January 1, 2023, the prior MSA definition and name were applied to the review period for this evaluation in accordance with Regulation BB §228.41(b).

- Population totals in the AA continued to grow between 2020 and 2023. The U.S. Census Bureau indicates that the Houston-The Woodlands-Sugar Land, TX MSA grew by 341,530 residents during this time, ranking it second among all MSAs nationwide.
- Between July 1, 2022 and July 1, 2023, the counties of Harris and Montgomery experienced significant population growth, ranking first and third in the nation, respectively. This further highlights the influx of residents to the AA.
- According to U.S. Census Bureau, the city of Houston has an estimated population of 2.3 million people, representing approximately half of the total population of Harris County.

Table 10

| Median Family Income Change<br>Assessment Area: Houston Metropolitan |                                |                                |                |
|--|--------------------------------|--------------------------------|----------------|
| Area   | 2015 Median Family Income (\$) | 2020 Median Family Income (\$) | Percent Change |
| Houston Metropolitan   | 71,268                         | 77,293                         | 8.5            |
| Brazoria County, TX  | 89,293                         | 96,168                         | 7.7            |
| Harris County, TX  | 67,969                         | 73,274                         | 7.8            |
| Montgomery County, TX  | 88,680                         | 99,511                         | 12.2           |
| Houston-The Woodlands-Sugar Land, TX MSA                             | 75,795                         | 81,859                         | 8.0            |
| 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 Table 10 illustrates, the median family income (MFI) in the AA grew between 2015 and 2020. This increase was negated by the 9.2 percent cumulative inflation rate experienced in the same period per the inflation data of the Bureau of Labor Statistics (BLS).
- The rate growth of the AA's MFI was below the statewide rate and other major metropolitan areas in Texas, indicating the AA lagged other parts of the state in terms of high-paying job growth.
- The FFIEC estimates the MFI for the Houston-The Woodlands-Sugar Land, TX MSA increased by 14.9 percent between 2020 and 2023, indicating continued economic growth in the area.
- A community contact indicated that during and immediately following the COVID-19 pandemic many people severed ties with the more densely populated and urban areas of the MSA given their ability to work remotely. This allowed higher-earning individuals to relocate to more suburban geographies in the area, which may account for the higher MFI growth in Montgomery County than in Harris County.

Table 11

| Area                                     | Housing Cost Burden<br>Assessment Area: Houston Metropolitan |                 |             |            |                 |            |
|--|--|-----------------|-------------|------------|-----------------|------------|
|  | Low-Income   | Moderate-Income | All Renters | Low-Income | Moderate-Income | All Owners |
| Houston Metropolitan                     | 81.7   | 45.3            | 44.9        | 59.1       | 35.2            | 19.7       |
| Brazoria County, TX                      | 76.3   | 32.9            | 39.4        | 49.4       | 28.2            | 16.9       |
| Harris County, TX                        | 82.0   | 45.4            | 45.7        | 60.7       | 35.9            | 20.3       |
| Montgomery County, TX                    | 80.2   | 52.3            | 38.4        | 54.8       | 35.5            | 17.4       |
| Houston-The Woodlands-Sugar Land, TX MSA | 81.2   | 46.2            | 44.6        | 59.8       | 35.9            | 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 cost burden for LMI persons in the AA is higher than the statewide figure in all relevant categories. While the percentage of low-income households spending 30 percent or more on housing is higher in Harris County, the cost burden on moderate-income households is greater in Montgomery County.
- The median housing value in Montgomery County is approximately 30 percent higher than Harris County, while Brazoria County housing is priced in between; however, the median housing value for only those units located in LMI census tracts is lowest in Montgomery County.
- Other barriers to homeownership, such as downpayment requirements, inhibit many LMI renters from transitioning to home ownership, where the cost burdens are generally lighter.
- One contact indicated that the need for affordable housing continues to increase given the AA population growth. The contact expects this need to only increase in the coming years.

Table 12

| Area                                     | Unemployment Rates<br>Assessment Area: Houston Metropolitan |      |      |      |      |
|--|---|------|------|------|------|
|  | 2018  | 2019 | 2020 | 2021 | 2022 |
| Houston Metropolitan                     | 4.4   | 3.8  | 8.8  | 6.3  | 4.2  |
| Brazoria County, TX                      | 4.6   | 4.2  | 8.6  | 6.8  | 4.5  |
| Harris County, TX                        | 4.4   | 3.9  | 9.0  | 6.4  | 4.2  |
| Montgomery County, TX                    | 3.8   | 3.4  | 7.5  | 5.8  | 3.9  |
| Houston-The Woodlands-Sugar Land, TX MSA | 4.4   | 3.8  | 8.7  | 6.3  | 4.2  |
| Texas                                    | 3.9   | 3.5  | 7.7  | 5.6  | 3.9  |

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The unemployment rate for all counties peaked in 2020 primarily due to the COVID-19 pandemic and the mitigation efforts undertaken by state and local governments to prevent contagion. As reflected in Table 12, the AA unemployment rates reached pre-pandemic levels by 2022.
- Unemployment rates for all AA counties, as well as the rate for the Houston-The Woodlands-Sugar Land, TX MSA were consistently above the statewide unemployment rate between 2020 and 2022. Brazoria County typically experienced the highest unemployment rates in the AA.

- The AA is home to many large employers; 13 of them have 10,000 or more employees. The top 100 employers in the AA account for nearly 600,000 regional workers. These major employers include H-E-B Grocery Company, Walmart, Houston Methodist Hospital, Memorial Hermann Health Systems, and University of Texas MD Anderson Cancer Center.

Table 13 details selected characteristics of the AA.

Table 13

| 2023 Combined Demographics<br>Assessment Area: Houston Metropolitan   |                                 |                                    |                          |              |  |              |                           |              |
|---|---------------------------------|------------------------------------|--------------------------|--------------|--|--------------|---------------------------|--------------|
| Income Categories   | Tract Distribution              |                                    | Families by Tract Income |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|   | #                               | %                                  | #                        | %            | #  | %            | #                         | %            |
| Low-income  | 209                             | 15.8                               | 164,943                  | 12.1         | 53,458   | 32.4         | 344,259                   | 25.3         |
| Moderate-income   | 341                             | 25.7                               | 331,821                  | 24.4         | 54,035   | 16.3         | 234,668                   | 17.3         |
| Middle-income   | 345                             | 26.0                               | 396,581                  | 29.2         | 30,141   | 7.6          | 244,653                   | 18.0         |
| Upper-income  | 387                             | 29.2                               | 448,165                  | 32.9         | 14,779   | 3.3          | 536,571                   | 39.4         |
| Unknown-income  | 44                              | 3.3                                | 18,641                   | 1.4          | 4,345  | 23.3         | 0                         | 0.0          |
| <b>Total Assessment Area</b>  | <b>1,326</b>                    | <b>100.0</b>                       | <b>1,360,151</b>         | <b>100.0</b> | <b>156,758</b>                                     | <b>11.5</b>  | <b>1,360,151</b>          | <b>100.0</b> |
|   | Housing Units by Tract          | Housing Types by Tract             |                          |              |  |              |                           |              |
|   |                                 | Owner-Occupied                     |                          |              | Rental   |              | Vacant                    |              |
|   |                                 | #                                  | %                        | %            | #  | %            | #                         | %            |
| Low-income  | 291,368                         | 69,912                             | 6.2                      | 24.0         | 184,798  | 63.4         | 36,658                    | 12.6         |
| Moderate-income   | 531,529                         | 237,574                            | 20.9                     | 44.7         | 244,568  | 46.0         | 49,387                    | 9.3          |
| Middle-income   | 601,872                         | 356,313                            | 31.4                     | 59.2         | 196,021  | 32.6         | 49,538                    | 8.2          |
| Upper-income  | 686,906                         | 460,217                            | 40.5                     | 67.0         | 176,278  | 25.7         | 50,411                    | 7.3          |
| Unknown-income  | 46,605                          | 11,948                             | 1.1                      | 25.6         | 28,023   | 60.1         | 6,634                     | 14.2         |
| <b>Total Assessment Area</b>  | <b>2,158,280</b>                | <b>1,135,964</b>                   | <b>100.0</b>             | <b>52.6</b>  | <b>829,688</b>                                     | <b>38.4</b>  | <b>192,628</b>            | <b>8.9</b>   |
|   | Total Businesses by Tract       | Businesses by Tract & Revenue Size |                          |              |  |              |                           |              |
|   |                                 | Less Than or = \$1 Million         |                          |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|   |                                 | #                                  | %                        | #            | %  | #            | %                         | #            |
| Low-income  | 29,579                          | 10.3                               | 26,730                   | 10.2         | 2,668  | 12.8         | 181                       | 5.8          |
| Moderate-income   | 60,606                          | 21.1                               | 55,085                   | 21.0         | 5,074  | 24.3         | 447                       | 14.3         |
| Middle-income   | 74,654                          | 26.0                               | 69,430                   | 26.4         | 4,563  | 21.8         | 661                       | 21.1         |
| Upper-income  | 116,727                         | 40.7                               | 106,856                  | 40.6         | 8,095  | 38.7         | 1,776                     | 56.6         |
| Unknown-income  | 5,364                           | 1.9                                | 4,781                    | 1.8          | 512  | 2.4          | 71                        | 2.3          |
| <b>Total Assessment Area</b>  | <b>286,930</b>                  | <b>100.0</b>                       | <b>262,882</b>           | <b>100.0</b> | <b>20,912</b>                                      | <b>100.0</b> | <b>3,136</b>              | <b>100.0</b> |
|   | Percentage of Total Businesses: |                                    |                          |              |  |              |                           | 1.1          |
|   | Total Farms by Tract            | Farms by Tract & Revenue Size      |                          |              |  |              |                           |              |
|   |                                 | Less Than or = \$1 Million         |                          |              | Over \$1 Million                                   |              | Revenue Not Reported      |              |
|   |                                 | #                                  | %                        | #            | %  | #            | %                         | #            |
| Low-income  | 69                              | 3.8                                | 66                       | 3.8          | 3  | 8.6          | 0                         | 0.0          |
| Moderate-income   | 240                             | 13.4                               | 228                      | 13.0         | 12   | 34.3         | 0                         | 0.0          |
| Middle-income   | 517                             | 28.8                               | 508                      | 28.9         | 6  | 17.1         | 3                         | 100.0        |
| Upper-income  | 940                             | 52.4                               | 927                      | 52.8         | 13   | 37.1         | 0                         | 0.0          |
| Unknown-income  | 29                              | 1.6                                | 28                       | 1.6          | 1  | 2.9          | 0                         | 0.0          |
| <b>Total Assessment Area</b>  | <b>1,795</b>                    | <b>100.0</b>                       | <b>1,757</b>             | <b>100.0</b> | <b>35</b>  | <b>100.0</b> | <b>3</b>                  | <b>100.0</b> |
|   | Percentage of Total Farms:      |                                    |                          |              |  |              |                           | 0.2          |
| Source: 2023 FFIEC Census Data<br>2023 D&B Information<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                 |                                    |                          |              |  |              |                           |              |

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

### LENDING TEST

Third Coast's lending test performance in the Houston Metropolitan AA is adequate.

For this evaluation, the bank's small business lending was given greater weight than home mortgage lending when determining overall performance. The volume of small business loans in the AA was higher than that of home mortgage loans, and the bank's strategic focus is heavily tilted toward commercial lending. Additionally, no small farm loans were made in the AA during the review period; therefore, this product was not considered when evaluating the bank's overall performance in the AA.

Details of the bank's home mortgage and small business lending as well as aggregate lenders' performance can be found in Appendix C.

### Lending Activity

The bank's lending activity reflects good responsiveness to the AA credit needs although limited use of innovative and/or flexible lending practices was noted. During the review period, the bank originated 167 home mortgage and 442 small business loans. While Third Coast ranked among the top 50 financial institutions in the AA due to the volume of small business lending, its 442 originations represented 0.1 percent of the total small business originations in the AA during the review period. This is below the bank's 1.0 percent deposit market share, which highlights the high level of competition for small business loans in the AA. Further, Third Coast made limited use of flexible lending practices through its participation in government-guaranteed lending programs and small business initiatives in the AA, including more than \$25.4 million worth of SBA loan originations.

### *Geographic Distribution of Loans*

The geographic distribution of lending reflects good penetration throughout the AA. While Third Coast's home mortgage lending reflects adequate distribution among geographies of different income levels, the geographic distribution of the small business lending is good. During the review period, Third Coast typically made loans in reasonable proximity to its branches in the AA. Census tracts along the edges of the AA as well as portions of Brazoria County reflected lower levels of lending; however, these regions are geographically distant from the Third Coast locations and are less densely populated than other areas of the AA.

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

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

The geographic distribution of home mortgage lending reflects adequate penetration throughout the AA. The distribution of the bank's 2022 home mortgage loans among low-income census tracts exceeded the level of aggregate lending and the percentage of owner-occupied units such geographies. Among moderate-income census tracts, which contain more than three times as

many owner-occupied housing units, the bank's lending fell below aggregate lenders' performance.

In 2023, the distribution of Third Coast's home mortgage lending among low-income census tracts declined, falling below aggregate lending data. Among moderate-income census tracts, the bank's lending improved, nearing aggregate lenders' performance, but remained below the demographic figure.

Third Coast's total number of HMDA-reportable originations in the AA declined significantly in 2023, mirroring the performance of aggregate lenders. The decline in HMDA-reportable lending is primarily attributed to the rise of interest rates, which rose from an average rate of 3.1 percent for a 30-year fixed rate mortgage loan at the start of 2022 to 7.8 percent in October 2023. As interest rates rose, demand for these loans fell, resulting in 21.5 percent fewer HMDA-reportable loan originations in LMI census tracts in 2023 when compared to 2022. Such a decrease in loan demand resulted in increased competition among the 906 financial institutions reporting HMDA loans in the AA in 2023.

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

#### *Home Purchase Lending*

The geographic distribution of home purchase lending is adequate. While the distribution of 2022 home purchase loans among low-income census tracts exceeded aggregate data and the demographic figure, the bank's performance in moderate-income census tracts was well both figures.

Third Coast's lending performance among low-income census tracts in 2023 declined sharply, reflecting penetration levels below aggregate lenders. While the bank's home purchase lending among moderate-income census tracts improved notably in 2023, it did not raise to the level of aggregate lending or the demographic figure.

Distribution of home purchase lending among middle- and upper-income census tracts did not impact conclusions about the bank's lending among LMI census tracts.

#### *Home Refinance Lending*

The geographic distribution of home refinance lending is good. The distribution of 2022 home refinance loans among LMI census tracts was well above aggregate data and comparable to the demographic figure, reflecting favorably on Third Coast's responsiveness to the credit needs of these geographies. In 2023, the bank's home refinance lending fell to an extent which limits the meaningfulness of an analysis of the distribution of these loans. This is attributed to the raising interest rates and the particularly significant impact interest rates have on this loan product. Total home refinance lending in the AA highlights this impact, as home refinance lending reported by all HMDA-reporting institutions that originated or purchased loans in the AA fell by 64.7 percent from 2022 to 2023. The drop in demand for home refinance lending coupled with high level of competition among financial institutions makes the bank's performance reasonable.

Distribution of home refinance lending among middle- and upper-income census tracts did not impact conclusions about the bank's lending among LMI census tracts.

Table 14 provides details about the bank's 2022 and 2023 home mortgage lending by income level of geography within the AA.

Table 14A

| Distribution of 2022 and 2023 Home Mortgage Lending by Income Level of Geography<br>Assessment Area: Houston Metropolitan |                                  |       |         |         |       |       |     |       |         |         |       |                              |       |
|---|----------------------------------|-------|---------|---------|-------|-------|-----|-------|---------|---------|-------|------------------------------|-------|
| Geographic<br>Income<br>Level   | Bank And Aggregate Loans By Year |       |         |         |       |       |     |       |         |         |       | Owner<br>Occupied<br>Units % |       |
|   | 2022                             |       |         |         |       | 2023  |     |       |         |         |       |                              |       |
|   | Bank                             | Agg   | Bank    | Agg     |       | Bank  | Agg | Bank  | Agg     |         |       |                              |       |
| #   | #%                               | #%    | \$(000) | \$(000) | \$%   | #     | #%  | #%    | \$(000) | \$(000) | \$%   | \$%                          |       |
| <b>Home Purchase Loans</b>  |                                  |       |         |         |       |       |     |       |         |         |       |                              |       |
| <b>Low</b>  | 5                                | 7.2   | 4.4     | 1,561   | 3.6   | 3.1   | 1   | 2.3   | 4.3     | 200     | 0.9   | 3.2                          | 6.2   |
| <b>Moderate</b>   | 4                                | 5.8   | 17.0    | 1,240   | 2.9   | 12.4  | 6   | 14.0  | 17.2    | 1,606   | 7.1   | 13.1                         | 20.9  |
| <b>Middle</b>   | 9                                | 13.0  | 32.0    | 4,081   | 9.5   | 27.4  | 8   | 18.6  | 34.3    | 4,514   | 19.9  | 29.7                         | 31.4  |
| <b>Upper</b>  | 51                               | 73.9  | 45.4    | 36,192  | 84.0  | 56.0  | 28  | 65.1  | 43.1    | 16,345  | 72.1  | 53.1                         | 40.5  |
| <b>Unknown</b>  | 0                                | 0.0   | 1.2     | 0       | 0.0   | 1.1   | 0   | 0.0   | 1.1     | 0       | 0.0   | 1.0                          | 1.1   |
| <b>Total</b>  | 69                               | 100.0 | 100.0   | 43,074  | 100.0 | 100.0 | 43  | 100.0 | 100.0   | 22,665  | 100.0 | 100.0                        | 100.0 |
| <b>Refinance Loans</b>  |                                  |       |         |         |       |       |     |       |         |         |       |                              |       |
| <b>Low</b>  | 2                                | 5.7   | 3.9     | 517     | 2.5   | 2.6   | 0   | 0.0   | 5.6     | 0       | 0.0   | 4.2                          | 6.2   |
| <b>Moderate</b>   | 10                               | 28.6  | 16.2    | 1,451   | 7.1   | 10.6  | 1   | 16.7  | 19.9    | 120     | 3.6   | 14.3                         | 20.9  |
| <b>Middle</b>   | 10                               | 28.6  | 32.9    | 2,257   | 11.0  | 26.2  | 2   | 33.3  | 33.6    | 660     | 20.1  | 28.1                         | 31.4  |
| <b>Upper</b>  | 12                               | 34.3  | 46.0    | 16,133  | 78.6  | 59.7  | 3   | 50.0  | 40.1    | 2,502   | 76.3  | 52.7                         | 40.5  |
| <b>Unknown</b>  | 1                                | 2.9   | 1.0     | 160     | 0.8   | 0.9   | 0   | 0.0   | 0.9     | 0       | 0.0   | 0.7                          | 1.1   |
| <b>Total</b>  | 35                               | 100.0 | 100.0   | 20,518  | 100.0 | 100.0 | 6   | 100.0 | 100.0   | 3,282   | 100.0 | 100.0                        | 100.0 |
| <b>Home Improvement Loans</b>   |                                  |       |         |         |       |       |     |       |         |         |       |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 3.8     | 0       | 0.0   | 2.8   | 0   | 0.0   | 3.0     | 0       | 0.0   | 2.9                          | 6.2   |
| <b>Moderate</b>   | 0                                | 0.0   | 12.4    | 0       | 0.0   | 9.0   | 0   | 0.0   | 12.6    | 0       | 0.0   | 10.5                         | 20.9  |
| <b>Middle</b>   | 0                                | 0.0   | 24.8    | 0       | 0.0   | 19.6  | 0   | 0.0   | 28.2    | 0       | 0.0   | 23.8                         | 31.4  |
| <b>Upper</b>  | 1                                | 100.0 | 58.1    | 250     | 100.0 | 67.6  | 0   | 0.0   | 55.3    | 0       | 0.0   | 62.1                         | 40.5  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.9     | 0       | 0.0   | 0.9   | 0   | 0.0   | 0.8     | 0       | 0.0   | 0.7                          | 1.1   |
| <b>Total</b>  | 1                                | 100.0 | 100.0   | 250     | 100.0 | 100.0 | 0   | 0.0   | 100.0   | 0       | 0.0   | 100.0                        | 100.0 |
| <b>Multifamily Loans</b>  |                                  |       |         |         |       |       |     |       |         |         |       |                              |       |
| <b>Low</b>  | 1                                | 25.0  | 21.8    | 488     | 10.3  | 13.8  | 0   | 0.0   | 19.9    | 0       | 0.0   | 14.8                         | 24.6  |
| <b>Moderate</b>   | 1                                | 25.0  | 27.5    | 592     | 12.5  | 19.4  | 2   | 33.3  | 28.8    | 838     | 16.4  | 25.0                         | 26.4  |
| <b>Middle</b>   | 0                                | 0.0   | 20.7    | 0       | 0.0   | 27.8  | 3   | 50.0  | 18.1    | 3,158   | 62.0  | 18.7                         | 20.5  |
| <b>Upper</b>  | 1                                | 25.0  | 26.6    | 2,362   | 49.8  | 33.4  | 1   | 16.7  | 30.5    | 1,100   | 21.6  | 37.5                         | 24.0  |
| <b>Unknown</b>  | 1                                | 25.0  | 3.3     | 1,302   | 27.4  | 5.6   | 0   | 0.0   | 2.7     | 0       | 0.0   | 4.0                          | 4.4   |
| <b>Total</b>  | 4                                | 100.0 | 100.0   | 4,744   | 100.0 | 100.0 | 6   | 100.0 | 100.0   | 5,095   | 100.0 | 100.0                        | 100.0 |
| <b>Total Home Mortgage Loans</b>  |                                  |       |         |         |       |       |     |       |         |         |       |                              |       |
| <b>Low</b>  | 8                                | 7.3   | 4.3     | 2,566   | 3.7   | 4.7   | 1   | 1.8   | 4.4     | 200     | 0.6   | 4.1                          | 6.2   |
| <b>Moderate</b>   | 15                               | 13.6  | 16.7    | 3,283   | 4.7   | 13.1  | 9   | 15.8  | 17.3    | 2,563   | 8.1   | 14.0                         | 20.9  |
| <b>Middle</b>   | 19                               | 17.3  | 32.0    | 6,338   | 9.2   | 27.1  | 13  | 22.8  | 33.9    | 8,332   | 26.4  | 28.6                         | 31.4  |
| <b>Upper</b>  | 66                               | 60.0  | 45.9    | 55,524  | 80.3  | 53.3  | 34  | 59.6  | 43.4    | 20,417  | 64.8  | 52.1                         | 40.5  |
| <b>Unknown</b>  | 2                                | 1.8   | 1.1     | 1,462   | 2.1   | 1.7   | 0   | 0.0   | 1.1     | 0       | 0.0   | 1.2                          | 1.1   |
| <b>Total</b>  | 110                              | 100.0 | 100.0   | 69,173  | 100.0 | 100.0 | 57  | 100.0 | 100.0   | 31,511  | 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 14B

| Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography<br>Assessment Area: Houston Metropolitan |                                  |       |         |     |       |       |     |         |       |     |                               |       |
|---|----------------------------------|-------|---------|-----|-------|-------|-----|---------|-------|-----|-------------------------------|-------|
| Geographic<br>Income<br>Level   | Bank And Aggregate Loans By Year |       |         |     |       |       |     |         |       |     | Owner-<br>Occupied<br>Units % |       |
|   | 2022                             |       |         |     |       | 2023  |     |         |       |     |                               |       |
|   | Bank                             | Agg   | Bank    | Agg | \$%   | Bank  | Agg | Bank    | Agg   | \$% |                               |       |
| #   | #%                               | #%    | \$(000) | \$% | \$%   | #     | #%  | \$(000) | \$%   | \$% |                               |       |
| <b>Other Purpose LOC</b>  |                                  |       |         |     |       |       |     |         |       |     |                               |       |
| <b>Low</b>  | 0                                | 0.0   | 2.4     | 0   | 0.0   | 1.8   | 0   | 0.0     | 2.4   | 0   | 0.0                           | 1.5   |
| <b>Moderate</b>   | 0                                | 0.0   | 8.8     | 0   | 0.0   | 6.1   | 0   | 0.0     | 8.0   | 0   | 0.0                           | 4.7   |
| <b>Middle</b>   | 0                                | 0.0   | 23.9    | 0   | 0.0   | 18.1  | 0   | 0.0     | 26.5  | 0   | 0.0                           | 19.7  |
| <b>Upper</b>  | 0                                | 0.0   | 63.8    | 0   | 0.0   | 73.1  | 0   | 0.0     | 61.9  | 0   | 0.0                           | 73.2  |
| <b>Unknown</b>  | 0                                | 0.0   | 1.0     | 0   | 0.0   | 0.8   | 0   | 0.0     | 1.2   | 0   | 0.0                           | 0.9   |
| <b>Total</b>  | 0                                | 0.0   | 100.0   | 0   | 0.0   | 100.0 | 0   | 0.0     | 100.0 | 0   | 0.0                           | 100.0 |
| <b>Other Purpose Closed/Exempt</b>  |                                  |       |         |     |       |       |     |         |       |     |                               |       |
| <b>Low</b>  | 0                                | 0.0   | 3.5     | 0   | 0.0   | 2.1   | 0   | 0.0     | 4.2   | 0   | 0.0                           | 4.3   |
| <b>Moderate</b>   | 0                                | 0.0   | 15.6    | 0   | 0.0   | 8.1   | 0   | 0.0     | 16.5  | 0   | 0.0                           | 13.9  |
| <b>Middle</b>   | 0                                | 0.0   | 30.2    | 0   | 0.0   | 18.1  | 0   | 0.0     | 32.8  | 0   | 0.0                           | 26.1  |
| <b>Upper</b>  | 1                                | 100.0 | 50.0    | 587 | 100.0 | 70.4  | 2   | 100.0   | 45.4  | 470 | 100.1                         | 53.8  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.7     | 0   | 0.0   | 1.3   | 0   | 0.0     | 1.1   | 0   | 0.0                           | 1.9   |
| <b>Total</b>  | 1                                | 100.0 | 100.0   | 587 | 100.0 | 100.0 | 2   | 100.0   | 100.0 | 470 | 100.0                         | 100.0 |
| <b>Purpose Not Applicable</b>   |                                  |       |         |     |       |       |     |         |       |     |                               |       |
| <b>Low</b>  | 0                                | 0.0   | 4.5     | 0   | 0.0   | 8.1   | 0   | 0.0     | 4.1   | 0   | 0.0                           | 2.1   |
| <b>Moderate</b>   | 0                                | 0.0   | 27.0    | 0   | 0.0   | 19.5  | 0   | 0.0     | 24.1  | 0   | 0.0                           | 13.1  |
| <b>Middle</b>   | 0                                | 0.0   | 41.1    | 0   | 0.0   | 37.4  | 0   | 0.0     | 42.0  | 0   | 0.0                           | 28.7  |
| <b>Upper</b>  | 0                                | 0.0   | 26.4    | 0   | 0.0   | 34.0  | 0   | 0.0     | 28.4  | 0   | 0.0                           | 33.5  |
| <b>Unknown</b>  | 0                                | 0.0   | 1.1     | 0   | 0.0   | 1.0   | 0   | 0.0     | 1.5   | 0   | 0.0                           | 22.5  |
| <b>Total</b>  | 0                                | 0.0   | 100.0   | 0   | 0.0   | 100.0 | 0   | 0.0     | 100.0 | 0   | 0.0                           | 100.0 |
| Source: 2023 FFIEC Census Data<br>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 good penetration throughout the AA. In 2022, Third Coast originated a similar volume of small business loans to businesses in low-income census tracts as aggregate lenders. The bank's small business lending among businesses in low-income census tracts improved in 2023, raising above the percentage of total AA businesses in these tracts and aggregate lenders' performance.

Among moderate-income census tracts, the bank's small business lending performance in 2021 was below the performance of aggregate lenders as well as the percentage of businesses located in these tracts. Third Coast's performance improved in 2022, exceeding both aggregate data and the demographic figure.

The increase in the distribution of the bank's small business lending among businesses in LMI census tracts within the AA, displayed in Table 15, is noteworthy as the performance of aggregate lenders declined in both income categories between 2022 and 2023. This trend reflects favorably on the bank's responsiveness to the credit needs and opportunities of LMI geographies within the AA.

Table 15

| Geographic Income Level | Bank And Aggregate Loans By Year |              |              |               |              |              |            |              |              |               |              | Total Businesses % |  |
|-------------------------|----------------------------------|--------------|--------------|---------------|--------------|--------------|------------|--------------|--------------|---------------|--------------|--------------------|--|
|                         | 2022                             |              |              |               |              | 2023         |            |              |              |               |              |                    |  |
|                         | Bank                             |              | Agg          | Bank          |              | Agg          | Bank       |              | Agg          | Bank          |              |                    |  |
|                         | #                                | #%           | #%           | \$(000)       | \$%          | \$%          | #          | #%           | #%           | \$(000)       | \$%          | \$%                |  |
| Low                     | 23                               | 9.3          | 9.6          | 7,225         | 9.4          | 11.0         | 23         | 11.7         | 9.1          | 9,191         | 15.2         | 10.3               |  |
| Moderate                | 38                               | 15.4         | 20.3         | 12,899        | 16.7         | 22.5         | 46         | 23.5         | 19.8         | 16,278        | 26.9         | 22.2               |  |
| Middle                  | 79                               | 32.1         | 25.9         | 26,597        | 34.5         | 23.9         | 43         | 21.9         | 25.9         | 14,210        | 23.5         | 23.8               |  |
| Upper                   | 103                              | 41.9         | 41.9         | 28,812        | 37.3         | 40.8         | 83         | 42.3         | 43.0         | 19,735        | 32.7         | 41.7               |  |
| Unknown                 | 3                                | 1.2          | 1.8          | 1,660         | 2.2          | 1.7          | 1          | 0.5          | 1.8          | 1,000         | 1.7          | 1.9                |  |
| <b>Total</b>            | <b>246</b>                       | <b>100.0</b> | <b>100.0</b> | <b>77,193</b> | <b>100.0</b> | <b>100.0</b> | <b>196</b> | <b>100.0</b> | <b>100.0</b> | <b>60,414</b> | <b>100.0</b> | <b>100.0</b>       |  |

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 overall distribution of Third Coast's 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 low- and moderate-income borrowers.

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

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 lenders.

Third Coast originated a very small number of home mortgage loans to LMI borrowers in 2022 and 2023, which is not commensurate to the demand for these loans reflected by aggregate lending and the applicable demographic figure. However, the bank's performance is skewed due to Third Coast's strategic focus and lending portfolio.

Table 17 shows Third Coast extended a high volume of the bank's home mortgage loans (more than 45 percent between 2022 and 2023) to borrowers with an unknown income level. This is attributable to the bank's focus as a commercial lender, as many of the mortgage loans were extended to a non-person borrower, such as an LLC, though secured by residential real estate, making the loan HMDA-reportable. These loans were originated for a variety of purposes, though the majority were for the purchase of investment property by small businesses and partnerships. The low volume of the bank's home mortgage lending among borrowers with known income levels decreases the weight given to this criterion when evaluating Third Coast's overall borrower distribution performance.

Table 16A

| Distribution of 2022 and 2023 Home Mortgage Lending by Borrower Income Level<br>Assessment Area: Houston Metropolitan                       |                                  |       |         |        |       |       |     |       |         |        |                                   |       |       |
|---|----------------------------------|-------|---------|--------|-------|-------|-----|-------|---------|--------|-----------------------------------|-------|-------|
| Borrower<br>Income Level  | Bank And Aggregate Loans By Year |       |         |        |       |       |     |       |         |        | Families by<br>Family<br>Income % |       |       |
|   | 2022                             |       |         |        |       | 2023  |     |       |         |        |                                   |       |       |
|   | Bank                             | Agg   | Bank    | Agg    |       | Bank  | Agg | Bank  | Agg     |        |                                   |       |       |
| #   | #%                               | #%    | \$(000) | \$%    | \$%   | #     | #%  | #%    | \$(000) | \$%    | \$%                               |       |       |
| <b>Home Purchase Loans</b>  |                                  |       |         |        |       |       |     |       |         |        |                                   |       |       |
| <b>Low</b>  | 0                                | 0.0   | 3.0     | 0      | 0.0   | 1.4   | 0   | 0.0   | 2.1     | 0      | 0.0                               | 0.9   | 25.3  |
| <b>Moderate</b>   | 1                                | 1.4   | 15.7    | 151    | 0.4   | 10.1  | 1   | 2.3   | 13.6    | 84     | 0.4                               | 8.8   | 17.3  |
| <b>Middle</b>   | 2                                | 2.9   | 21.3    | 897    | 2.1   | 17.3  | 3   | 7.0   | 19.6    | 807    | 3.6                               | 16.0  | 18.0  |
| <b>Upper</b>  | 34                               | 49.3  | 41.1    | 31,304 | 72.7  | 53.1  | 25  | 58.1  | 38.4    | 17,413 | 76.8                              | 50.2  | 39.4  |
| <b>Unknown</b>  | 32                               | 46.4  | 19.0    | 10,722 | 24.9  | 18.3  | 14  | 32.6  | 26.2    | 4,361  | 19.2                              | 24.1  | 0.0   |
| <b>Total</b>  | 69                               | 100.0 | 100.0   | 43,074 | 100.0 | 100.0 | 43  | 100.0 | 100.0   | 22,665 | 100.0                             | 100.0 | 100.0 |
| <b>Refinance Loans</b>  |                                  |       |         |        |       |       |     |       |         |        |                                   |       |       |
| <b>Low</b>  | 0                                | 0.0   | 7.5     | 0      | 0.0   | 3.8   | 0   | 0.0   | 7.6     | 0      | 0.0                               | 4.1   | 25.3  |
| <b>Moderate</b>   | 1                                | 2.9   | 17.5    | 172    | 0.8   | 11.3  | 0   | 0.0   | 16.1    | 0      | 0.0                               | 10.3  | 17.3  |
| <b>Middle</b>   | 1                                | 2.9   | 21.3    | 255    | 1.2   | 16.4  | 0   | 0.0   | 19.7    | 0      | 0.0                               | 15.0  | 18.0  |
| <b>Upper</b>  | 11                               | 31.4  | 40.4    | 11,662 | 56.8  | 54.1  | 4   | 66.7  | 40.7    | 2,777  | 84.6                              | 53.0  | 39.4  |
| <b>Unknown</b>  | 22                               | 62.9  | 13.3    | 8,429  | 41.1  | 14.5  | 2   | 33.3  | 15.8    | 505    | 15.4                              | 17.5  | 0.0   |
| <b>Total</b>  | 35                               | 100.0 | 100.0   | 20,518 | 100.0 | 100.0 | 6   | 100.0 | 100.0   | 3,282  | 100.0                             | 100.0 | 100.0 |
| <b>Home Improvement Loans</b>   |                                  |       |         |        |       |       |     |       |         |        |                                   |       |       |
| <b>Low</b>  | 0                                | 0.0   | 5.9     | 0      | 0.0   | 3.3   | 0   | 0.0   | 5.1     | 0      | 0.0                               | 3.1   | 25.3  |
| <b>Moderate</b>   | 0                                | 0.0   | 11.9    | 0      | 0.0   | 8.0   | 0   | 0.0   | 12.2    | 0      | 0.0                               | 7.8   | 17.3  |
| <b>Middle</b>   | 0                                | 0.0   | 16.7    | 0      | 0.0   | 11.4  | 0   | 0.0   | 18.0    | 0      | 0.0                               | 13.0  | 18.0  |
| <b>Upper</b>  | 0                                | 0.0   | 63.2    | 0      | 0.0   | 74.0  | 0   | 0.0   | 62.4    | 0      | 0.0                               | 71.3  | 39.4  |
| <b>Unknown</b>  | 1                                | 100.0 | 2.3     | 250    | 100.0 | 3.3   | 0   | 0.0   | 2.3     | 0      | 0.0                               | 4.7   | 0.0   |
| <b>Total</b>  | 1                                | 100.0 | 100.0   | 250    | 100.0 | 100.0 | 0   | 0.0   | 100.0   | 0      | 0.0                               | 100.0 | 100.0 |
| <b>Total Home Mortgage Loans</b>  |                                  |       |         |        |       |       |     |       |         |        |                                   |       |       |
| <b>Low</b>  | 0                                | 0.0   | 4.2     | 0      | 0.0   | 1.9   | 0   | 0.0   | 3.0     | 0      | 0.0                               | 1.3   | 25.3  |
| <b>Moderate</b>   | 2                                | 1.9   | 15.8    | 323    | 0.5   | 10.2  | 1   | 2.0   | 13.7    | 84     | 0.3                               | 8.9   | 17.3  |
| <b>Middle</b>   | 3                                | 2.8   | 20.8    | 1,152  | 1.8   | 16.8  | 3   | 5.9   | 19.4    | 807    | 3.1                               | 15.8  | 18.0  |
| <b>Upper</b>  | 46                               | 43.4  | 41.3    | 43,553 | 67.6  | 53.5  | 31  | 60.8  | 39.8    | 20,660 | 78.2                              | 50.8  | 39.4  |
| <b>Unknown</b>  | 55                               | 51.9  | 17.9    | 19,401 | 30.1  | 17.6  | 16  | 31.4  | 24.0    | 4,865  | 18.4                              | 23.2  | 0.0   |
| <b>Total</b>  | 106                              | 100.0 | 100.0   | 64,429 | 100.0 | 100.0 | 51  | 100.0 | 100.0   | 26,416 | 100.0                             | 100.0 | 100.0 |
| Source: 2023 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey   |                                  |       |         |        |       |       |     |       |         |        |                                   |       |       |
| Note: Percentages may not total 100.0 percent due to rounding.<br>Multifamily loans are not included in the borrower distribution analysis. |                                  |       |         |        |       |       |     |       |         |        |                                   |       |       |

Table 16B

| Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level  |                                  |       |       |          |       |       |      |       |       |          |       |                             |       |  |
|---|----------------------------------|-------|-------|----------|-------|-------|------|-------|-------|----------|-------|-----------------------------|-------|--|
| Assessment Area: Houston Metropolitan   |                                  |       |       |          |       |       |      |       |       |          |       |                             |       |  |
| 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) | \$ %  | \$ %                        |       |  |
| <b>Other Purpose LOC</b>  |                                  |       |       |          |       |       |      |       |       |          |       |                             |       |  |
| <b>Low</b>  | 0                                | 0.0   | 6.3   | 0        | 0.0   | 4.1   | 0    | 0.0   | 7.5   | 0        | 0.0   | 4.2                         | 25.3  |  |
| <b>Moderate</b>   | 0                                | 0.0   | 11.7  | 0        | 0.0   | 6.5   | 0    | 0.0   | 9.6   | 0        | 0.0   | 6.0                         | 17.3  |  |
| <b>Middle</b>   | 0                                | 0.0   | 15.3  | 0        | 0.0   | 10.3  | 0    | 0.0   | 16.2  | 0        | 0.0   | 9.6                         | 18.0  |  |
| <b>Upper</b>  | 0                                | 0.0   | 62.3  | 0        | 0.0   | 75.1  | 0    | 0.0   | 64.4  | 0        | 0.0   | 77.8                        | 39.4  |  |
| <b>Unknown</b>  | 0                                | 0.0   | 4.4   | 0        | 0.0   | 4.1   | 0    | 0.0   | 2.4   | 0        | 0.0   | 2.3                         | 0.0   |  |
| <b>Total</b>  | 0                                | 0.0   | 100.0 | 0        | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0        | 0.0   | 100.0                       | 100.0 |  |
| <b>Other Purpose Closed/Exempt</b>  |                                  |       |       |          |       |       |      |       |       |          |       |                             |       |  |
| <b>Low</b>  | 0                                | 0.0   | 8.0   | 0        | 0.0   | 4.3   | 0    | 0.0   | 6.1   | 0        | 0.0   | 3.9                         | 25.3  |  |
| <b>Moderate</b>   | 0                                | 0.0   | 17.4  | 0        | 0.0   | 9.0   | 0    | 0.0   | 16.0  | 0        | 0.0   | 10.9                        | 17.3  |  |
| <b>Middle</b>   | 0                                | 0.0   | 19.2  | 0        | 0.0   | 10.5  | 0    | 0.0   | 22.0  | 0        | 0.0   | 15.1                        | 18.0  |  |
| <b>Upper</b>  | 1                                | 100.0 | 48.7  | 587      | 100.0 | 63.0  | 2    | 100.0 | 49.1  | 470      | 100.1 | 58.0                        | 39.4  |  |
| <b>Unknown</b>  | 0                                | 0.0   | 6.7   | 0        | 0.0   | 13.2  | 0    | 0.0   | 6.9   | 0        | 0.0   | 12.0                        | 0.0   |  |
| <b>Total</b>  | 1                                | 100.0 | 100.0 | 587      | 100.0 | 100.0 | 2    | 100.0 | 100.0 | 470      | 100.0 | 100.0                       | 100.0 |  |
| <b>Purpose Not Applicable</b>   |                                  |       |       |          |       |       |      |       |       |          |       |                             |       |  |
| <b>Low</b>  | 0                                | 0.0   | 1.5   | 0        | 0.0   | 0.8   | 0    | 0.0   | 1.8   | 0        | 0.0   | 0.9                         | 25.3  |  |
| <b>Moderate</b>   | 0                                | 0.0   | 0.9   | 0        | 0.0   | 0.8   | 0    | 0.0   | 2.0   | 0        | 0.0   | 1.3                         | 17.3  |  |
| <b>Middle</b>   | 0                                | 0.0   | 0.4   | 0        | 0.0   | 0.5   | 0    | 0.0   | 0.5   | 0        | 0.0   | 0.4                         | 18.0  |  |
| <b>Upper</b>  | 0                                | 0.0   | 0.2   | 0        | 0.0   | 0.4   | 0    | 0.0   | 0.3   | 0        | 0.0   | 0.2                         | 39.4  |  |
| <b>Unknown</b>  | 0                                | 0.0   | 96.9  | 0        | 0.0   | 97.5  | 0    | 0.0   | 95.4  | 0        | 0.0   | 97.1                        | 0.0   |  |
| <b>Total</b>  | 0                                | 0.0   | 100.0 | 0        | 0.0   | 100.0 | 0    | 0.0   | 100.0 | 0        | 0.0   | 100.0                       | 100.0 |  |
| Source: 2023 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |          |       |       |      |       |       |          |       |                             |       |  |

### Small Business Lending

Considering Third Coast's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is adequate. During the review period, the substantial majority of AA businesses reported revenues of \$1 million or less, setting a demographic figure that was unmatched by the bank or aggregate lenders. In 2022, the bank's small business lending to businesses with gross annual revenues of \$1 million or less is slightly below the performance of aggregate lenders. In 2023, the bank's performance improved, nearing aggregate lending data, which also reflected improved performance over the previous year. It is noteworthy that in both presented years, Third Coast originated a larger percentage of small business loans by dollar amount to businesses with gross annual revenues of \$1 million or less than aggregate lenders. This reflects favorably on the bank's responsiveness to the credit needs of small businesses in the AA.

Table 17

| Distribution of 2021 and 2022 Small Business Lending by Revenue Size of Businesses                                      |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |
|---|----------------------------------|-------|-------|--------|----------|-------|------|-------|-------|--------|----------|-------|--------------------|--|
| Assessment Area: Houston Metropolitan   |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |
|   | Bank And Aggregate Loans By Year |       |       |        |          |       |      |       |       |        |          |       | Total Businesses % |  |
|   | 2022                             |       |       |        |          |       | 2023 |       |       |        |          |       |                    |  |
|   | Bank                             |       | Agg   |        | Bank     |       | Agg  |       | Bank  |        | Agg      |       |                    |  |
|   | #                                | #%    | #%    | #%     | \$ (000) | \$ %  | \$ % | #     | #%    | #%     | \$ (000) | \$ %  | \$ %               |  |
| <b>By Revenue</b>   |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |
| <b>\$1 Million or Less</b>  | 107                              | 43.5  | 49.0  | 35,860 | 46.5     | 33.4  | 93   | 47.4  | 51.6  | 29,518 | 48.9     | 32.2  | 91.6               |  |
| <b>Over \$1 Million</b>   | 116                              | 47.2  |       | 37,367 | 48.4     |       | 90   | 45.9  |       | 29,005 | 48.0     |       | 7.3                |  |
| <b>Revenue Unknown</b>  | 23                               | 9.3   |       | 3,966  | 5.1      |       | 13   | 6.6   |       | 1,891  | 3.1      |       | 1.1                |  |
| <b>Total</b>  | 246                              | 100.0 |       | 77,193 | 100.0    |       | 196  | 100.0 |       | 60,414 | 100.0    |       | 100.0              |  |
| <b>By Loan Size</b>   |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |
| <b>\$100,000 or Less</b>  | 77                               | 31.3  | 94.3  | 5,297  | 6.9      | 40.1  | 52   | 26.5  | 94.3  | 3,385  | 5.6      | 40.8  |                    |  |
| <b>\$100,001 - \$250,000</b>  | 59                               | 24.0  | 3.0   | 10,718 | 13.9     | 15.1  | 59   | 30.1  | 3.0   | 10,254 | 17.0     | 15.6  |                    |  |
| <b>\$250,001 - \$1 Million</b>  | 110                              | 44.7  | 2.7   | 61,178 | 79.3     | 44.8  | 85   | 43.4  | 2.6   | 46,775 | 77.4     | 43.6  |                    |  |
| <b>Total</b>  | 246                              | 100.0 | 100.0 | 77,193 | 100.0    | 100.0 | 196  | 100.0 | 100.0 | 60,414 | 100.0    | 100.0 |                    |  |
| <b>By Loan Size and Revenues \$1 Million or Less</b>  |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |
| <b>\$100,000 or Less</b>  | 29                               | 27.1  |       | 1,959  | 5.5      |       | 30   | 32.3  |       | 1,703  | 5.8      |       |                    |  |
| <b>\$100,001 - \$250,000</b>  | 26                               | 24.3  |       | 4,825  | 13.5     |       | 25   | 26.9  |       | 4,417  | 15.0     |       |                    |  |
| <b>\$250,001 - \$1 Million</b>  | 52                               | 48.6  |       | 29,076 | 81.1     |       | 38   | 40.9  |       | 23,398 | 79.3     |       |                    |  |
| <b>Total</b>  | 107                              | 100.0 |       | 35,860 | 100.0    |       | 93   | 100.0 |       | 29,518 | 100.0    |       |                    |  |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |
| Note: Percentages may not total 100.0 percent due to rounding.  |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |

### Community Development Lending

Third Coast makes an adequate level of CD loans in the Houston Metropolitan AA. As reflected in Table 18, the bank originated 27 qualified CD loans in the AA, totaling \$89.9 million, during the review period. The number and dollar amount of the bank's qualified CD loans decreased by approximately 57 percent and 13 percent, respectively, compared to the previous evaluation, though this is attributable to the conclusion of the PPP in May 2021. At the previous evaluation, Third Coast made 50 qualified loans through this program, representing more than 79 percent of the bank's CD loans and more than 89 percent of the total dollar amount originated during the prior review period. While the bank was not able to fully replace the activity conducted under the PPP, other CD lending increased notably. Additionally, the focus of the bank's CD lending shifted since the previous evaluation, which exemplifies responsiveness to the CD needs of the AA. The majority of Third Coast's CD lending at the previous evaluation was related to revitalization and stabilization of AA geographies, primarily in response to the COVID-19 pandemic. During this evaluation, Third Coast's CD lending focused primarily on economic development through financing small businesses, which better aligns with the bank's expertise as a commercial lender.

Table 18

| Community Development Lending         |           |               |
|---------------------------------------|-----------|---------------|
| Assessment Area: Houston Metropolitan |           |               |
| Purpose                               | #         | \$(000s)      |
| Affordable Housing                    | 1         | 271           |
| Community Services                    | 0         | 0             |
| Economic Development                  | 16        | 58,931        |
| Revitalization and Stabilization      | 10        | 30,684        |
| <b>Total</b>                          | <b>27</b> | <b>89,886</b> |

A community member contacted as part of this evaluation expressed frustration with the difficulties faced by small businesses seeking financing, stating that many owners of smaller businesses have had trouble acquiring financing once PPP funds were no longer available. A large portion of the bank's qualified lending was focused on this need, helping to create, retain, or improve jobs for LMI workers by providing needed credit to small businesses in the AA.

### INVESTMENT TEST

Third Coast's performance under the investment test in the Houston Metropolitan AA is adequate. While the bank is rarely in a leadership position, Third Coast has an adequate level of qualified CD investments and grants, particularly those not routinely provided by private investors. The bank 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.

As previously discussed, the significant majority of Third Coast's qualified CD investments made during the review period were to SBICs serving more than one of the bank's delineated AAs. Four of these investments went to SBICs that provided funding to businesses in the Houston Metropolitan AA; however, these funds were comingled with funds benefitting other AAs and could not be segregated to be included in Table 19. Third Coast made an investment to fund public improvement and developments for the revitalization of an LMI area in the AA during the review period. Even without considering the broad SBIC investments, the dollar amount of qualified investments made in the AA grew modestly compared to the previous evaluation.

Third Coast also made a greater volume of qualified donations in the AA compared to the previous evaluation. Qualified CD donations increased by 42.9 percent while the total dollar amount of these donations grew by more than 248 percent. Donations were made to a variety of organizations, including those providing financial education to LMI students, workforce development for LMI individuals, and essentials to the homeless and victims of domestic abuse, among others. Third Coast's CD donations reflect a willingness to engage with identified needs in the bank's community.

**Table 19**  
Investment, Grants, and Donations  
Assessment Area: Houston Metropolitan

| Community Development Purpose    | Prior Period Investments <sup>1</sup> |          | Current Investments <sup>2</sup> |              | Donations |           | Total     |              |
|----------------------------------|---------------------------------------|----------|----------------------------------|--------------|-----------|-----------|-----------|--------------|
|                                  | #                                     | \$(000s) | #                                | \$(000s)     | #         | \$(000s)  | #         | \$(000s)     |
| Affordable Housing               | 0                                     | 0        | 0                                | 0            | 6         | 18        | 6         | 18           |
| Community Services               | 0                                     | 0        | 1                                | 2,500        | 19        | 34        | 20        | 2,534        |
| Economic Development             | 0                                     | 0        | 0                                | 0            | 4         | 12        | 4         | 12           |
| Revitalization and Stabilization | 0                                     | 0        | 0                                | 0            | 1         | 1         | 1         | 1            |
| <b>Total</b>                     | <b>0</b>                              | <b>0</b> | <b>1</b>                         | <b>2,500</b> | <b>30</b> | <b>65</b> | <b>31</b> | <b>2,565</b> |

<sup>1</sup> Book value of investment

<sup>2</sup> Original market value of investment

## SERVICE TEST

Third Coast's service test performance is adequate.

### ***Retail Services***

The bank's delivery systems are accessible to the geographies and individuals of different income levels in the AA. The distribution of the bank's seven branch offices and two full-service ATMs as of December 31, 2023, was compared to the distribution of the population and businesses among the tract categories within the AA. Table 20 summarizes the bank's retail locations in the AA. Though Third Coast has a larger percentage of branches located in upper-income census tracts than the comparable demographics, none of the bank's branches are more than three miles from LMI geographies, reasonably serving the AA.

Table 20

| Branch and Full-Service ATM Locations<br>Assessment Area: Houston Metropolitan |                     |                    |                    |          |              |                      |              |
|--|---------------------|--------------------|--------------------|----------|--------------|----------------------|--------------|
| Tract<br>Income  | % of<br>Geographies | % of<br>Households | % of<br>Businesses | Branches |              | Full-Service<br>ATMs |              |
|  |                     |                    |                    | #        | %            | #                    | %            |
| Low  | 15.8                | 13.0               | 10.3               | 0        | 0.0          | 0                    | 0.0          |
| Moderate   | 25.7                | 24.5               | 21.1               | 1        | 14.3         | 1                    | 50.0         |
| Middle   | 26.0                | 28.1               | 26.0               | 1        | 14.3         | 0                    | 0.0          |
| Upper  | 29.2                | 32.41              | 40.8               | 5        | 71.4         | 1                    | 50.0         |
| Unknown  | 3.3                 | 2.0                | 1.9                | 0        | 0.0          | 0                    | 0.0          |
| <b>Total</b>   | <b>100.0</b>        | <b>100.0</b>       | <b>100.0</b>       | <b>7</b> | <b>100.0</b> | <b>2</b>             | <b>100.0</b> |

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

Since the previous evaluation, the bank opened a branch located in an upper-income census tract in the AA. Third Coast's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including in LMI income geographies or to LMI individuals. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly LMI geographies and/or individuals. The level of branch services and hours offered are generally the same throughout the AA. Lastly, the branch located in a moderate-income tract also offers drive-thru services.

### ***Community Development Services***

Third Coast provides an adequate level of CD services in the Houston Metropolitan AA. The bank's employees served in various capacities, including on boards of directors and steering committees, for 17 community organizations offering CD services that focused on financial education, vocational training, and health care for LMI individuals.

Third Coast focused on activities related to financial literacy education during the review period, representing the significant majority of services provided in the AA. These were specifically targeted by the bank as opportunities to reach LMI students to help them develop the skills necessary to take control of their financial future. Approximately 35 bank employees were involved in these efforts, whether by serving as financial literacy teachers or by serving on the board or steering committee for the organizations coordinating the programs. Third Coast's focus

on providing CD services to LMI youth extended beyond the classroom, with bank employees also serving with after school and mentoring programs.

While the number of services provided by bank representatives in the AA declined from the previous evaluation, total service hours served during the review period increased by more than 80 percent, reflecting a focus on depth of service rather than breadth.

Table 21 below shows the number of hours by type of involvement.

**Table 21**

| <b>Community Development Services<br/>Assessment Area: Houston Metropolitan</b> |                           |                        |                                |
|---|---------------------------|------------------------|--------------------------------|
| <b>Purpose</b>  | <b>Total<br/>Services</b> | <b>Total<br/>Hours</b> | <b>Total<br/>Organizations</b> |
| Affordable Housing  | 0                         | 0                      | 0                              |
| Community Services  | 65                        | 403                    | 17                             |
| Economic Development  | 0                         | 0                      | 0                              |
| Revitalization and Stabilization  | 0                         | 0                      | 0                              |
| <b>Total</b>  | <b>65</b>                 | <b>403</b>             | <b>17</b>                      |

**BEAUMONT-PORT ARTHUR, TX MSA ASSESSMENT AREA**  
(Full-Scope Review)

**DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN THE BEAUMONT-PORT ARTHUR, TX MSA ASSESSMENT AREA**

- The Beaumont-Port Arthur MSA AA consists of the entirety of Hardin, Jefferson, and Orange counties, on the Louisiana border in the Gulf Coast region of Texas. 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.
- As of 2022, the AA includes a total of 114 census tracts: nine low-, 29 moderate-, 32 middle-, 38 upper-, and six unknown-income census tracts. Since the previous evaluation, nine additional census tracts were defined within the AA, and the income level classification of many of the existing tracts changed.
- As of March 31, 2024, Third Coast operated two banking offices in the AA: including one in a moderate-income census tract and one in an upper-income census tract.
- According to the June 30, 2023, FDIC Deposit Market Share Report, the bank holds 2.8 percent of the deposit market share, ranking seventh among 18 FDIC-insured financial institutions with offices operating within the AA.
- A representative of a local small business development center and a member of the local government were contacted for additional context related to the AA. Both contacts mentioned the large immigrant population in the area and the unique credit needs of individuals new to or unfamiliar with the banking system. It was noted that many immigrants are unbanked and in need of education related to the acquisition and utilization of credit, especially related to small business ownership.

**Table 22**

| Population Change<br>Assessment Area: Beaumont-Port Arthur MSA |                    |                    |                   |
|--|--------------------|--------------------|-------------------|
| Area   | 2015<br>Population | 2020<br>Population | Percent<br>Change |
| Beaumont-Port Arthur MSA AA                                    | 391,464            | 397,565            | 1.6               |
| Hardin County, TX  | 55,375             | 56,231             | 1.5               |
| Jefferson County, TX   | 252,872            | 256,526            | 1.4               |
| Orange County, TX  | 83,217             | 84,808             | 1.9               |
| Texas  | 26,538,614         | 29,145,505         | 9.8               |

Source: 2020 U.S. Census Bureau Decennial Census  
2011-2015 U.S. Census Bureau: American Community Survey

- The AA population remained steady between 2015 and 2020, adding approximately 6,000 residents in that period. This growth rate is substantially lower than the statewide population growth rate, indicating that the Beaumont-Port Arthur MSA did not have the same level of attraction for new residents as other portions of the state did.
- According to U.S. Census Bureau estimates, the AA's population stagnated, declining by approximately 0.5 percent between 2020 and 2023. The approximately 2,000 residents that the AA lost was more than any other MSA in the state.

Table 23

| Median Family Income Change<br>Assessment Area: Beaumont-Port Arthur MSA |                                |                                |                |
|--|--------------------------------|--------------------------------|----------------|
| Area   | 2015 Median Family Income (\$) | 2020 Median Family Income (\$) | Percent Change |
| Beaumont-Port Arthur MSA AA  | 62,554                         | 68,971                         | 10.3           |
| Hardin County, TX  | 70,135                         | 75,852                         | 8.2            |
| Jefferson County, TX   | 59,672                         | 62,106                         | 4.1            |
| Orange County, TX  | 65,016                         | 80,700                         | 24.1           |
| Texas  | 68,523                         | 76,073                         | 11.0           |

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

- As Table 23 illustrates, the MFI in the AA grew between 2015 and 2020 at a rate only slightly greater than the 9.2 percent cumulative inflation rate during the same period.
- According to FFIEC estimates, the MFI in the AA has continued to grow rapidly, increasing by approximately 27 percent between 2020 and 2023. This increase is the second largest of any MSA in Texas and 53<sup>rd</sup> out of the 412 MSAs in the nation.
- A community contact noted that much of the MFI increase in the AA can be attributed to the relative strength of chemical and petroleum manufacturing, as the top five years for oil and gas production have occurred since 2018. Although wages have not kept up with inflation, they continue to grow.

Table 24

| Housing Cost Burden<br>Assessment Area: Beaumont-Port Arthur MSA |                       |                 |             |                      |                 |            |
|--|-----------------------|-----------------|-------------|----------------------|-----------------|------------|
| Area   | Cost Burden - Renters |                 |             | Cost Burden - Owners |                 |            |
|  | Low-Income            | Moderate-Income | All Renters | Low-Income           | Moderate-Income | All Owners |
| Beaumont-Port Arthur MSA AA                                      | 70.0                  | 35.7            | 39.7        | 44.6                 | 18.0            | 14.5       |
| Hardin County, TX  | 74.8                  | 21.7            | 38.7        | 44.3                 | 17.0            | 14.1       |
| Jefferson County, TX   | 69.7                  | 40.6            | 41.4        | 46.1                 | 20.0            | 16.1       |
| Orange County, TX  | 69.0                  | 21.6            | 32.5        | 40.3                 | 12.4            | 10.7       |
| 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

- The cost burden for LMI persons in the AA is generally lower than statewide figures. This indicates that LMI households are likely to find more favorable conditions in the AA than the remainder to the state.
- There is a sizable gap between the housing cost burden for low-income and moderate-income households. The percentage of moderate-income households spending 30 percent or more on housing is less than half that of low-income households across the AA, with the exception of renters in Jefferson County.

Table 25

| Area                        | Unemployment Rates |      |      |      |      |
|-----------------------------|--------------------|------|------|------|------|
|                             | 2018               | 2019 | 2020 | 2021 | 2022 |
| Beaumont-Port Arthur MSA AA | 6.1                | 5.5  | 11.2 | 9.3  | 5.9  |
| Hardin County, TX           | 5.2                | 4.6  | 8.9  | 7.9  | 5.2  |
| Jefferson County, TX        | 6.4                | 5.9  | 12.0 | 9.8  | 6.2  |
| Orange County, TX           | 5.8                | 5.2  | 10.6 | 8.8  | 5.7  |
| Texas                       | 3.9                | 3.5  | 7.7  | 5.6  | 3.9  |

Source: Bureau of Labor Statistics: Local Area Unemployment Statistics

- The AA unemployment rate peaked above 10 percent in 2020, attributed to the impact of the COVID-19 pandemic and the mitigation efforts undertaken by state and local governments to minimize contagion. As reflected in the Table 25, the AA unemployment rates reached pre-pandemic in 2022.
- Unemployment rates for the AA were consistently much higher than the statewide unemployment rates throughout the review period.
- Major business clusters in the AA include chemical and petroleum manufacturing, materials manufacturing, and transportation. Major employers include ENGlobal Corporation, ExxonMobil, Goodyear Tire & Rubber, Motiva Enterprises, and Valero Refining Group

Table 26 details selected characteristics of the AA.

Table 26

| 2023 Combined Demographics<br>Assessment Area: Beaumont-Port Arthur MSA |  |                                    |                          |                  |  |                      |                           |              |
|---|--|------------------------------------|--------------------------|------------------|--|----------------------|---------------------------|--------------|
| Income Categories   | Tract Distribution                                       |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |              |
|   | #  | %                                  | #                        | %                | #  | %                    | #                         | %            |
| Low-income  | 9  | 7.9                                | 5,871                    | 6.0              | 2,259  | 38.5                 | 22,480                    | 22.8         |
| Moderate-income   | 29   | 25.4                               | 20,523                   | 20.8             | 4,335  | 21.1                 | 17,211                    | 17.4         |
| Middle-income   | 32   | 28.1                               | 30,236                   | 30.7             | 3,146  | 10.4                 | 17,581                    | 17.8         |
| Upper-income  | 38   | 33.3                               | 40,328                   | 40.9             | 1,916  | 4.8                  | 41,361                    | 41.9         |
| Unknown-income  | 6  | 5.3                                | 1,675                    | 1.7              | 260  | 15.5                 | 0                         | 0.0          |
| <b>Total Assessment Area</b>  | <b>114</b>   | <b>100.0</b>                       | <b>98,633</b>            | <b>100.0</b>     | <b>11,916</b>                                      | <b>12.1</b>          | <b>98,633</b>             | <b>100.0</b> |
|   | Housing Units by Tract                                   | Housing Types by Tract             |                          |                  |  |                      |                           |              |
|   |  | Owner-Occupied                     |                          | Rental           |  | Vacant               |                           |              |
|   |  | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income  | 11,248   | 4,701                              | 4.8                      | 41.8             | 4,485  | 39.9                 | 2,062                     | 18.3         |
| Moderate-income   | 40,540   | 17,734                             | 18.0                     | 43.7             | 16,586   | 40.9                 | 6,220                     | 15.3         |
| Middle-income   | 51,939   | 30,403                             | 30.9                     | 58.5             | 14,184   | 27.3                 | 7,352                     | 14.2         |
| Upper-income  | 65,284   | 43,798                             | 44.5                     | 67.1             | 12,334   | 18.9                 | 9,152                     | 14.0         |
| Unknown-income  | 2,930  | 1,869                              | 1.9                      | 63.8             | 676  | 23.1                 | 385                       | 13.1         |
| <b>Total Assessment Area</b>  | <b>171,941</b>   | <b>98,505</b>                      | <b>100.0</b>             | <b>57.3</b>      | <b>48,265</b>                                      | <b>28.1</b>          | <b>25,171</b>             | <b>14.6</b>  |
|   | Total Businesses by Tract                                | Businesses by Tract & Revenue Size |                          |                  |  |                      |                           |              |
|   |  | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|   |  | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income  | 603  | 3.8                                | 547                      | 3.7              | 47   | 4.4                  | 9                         | 5.2          |
| Moderate-income   | 4,043  | 25.3                               | 3,676                    | 25.0             | 342  | 31.9                 | 25                        | 14.4         |
| Middle-income   | 4,263  | 26.7                               | 3,984                    | 27.1             | 239  | 22.3                 | 40                        | 23.0         |
| Upper-income  | 6,358  | 39.8                               | 5,931                    | 40.3             | 336  | 31.3                 | 91                        | 52.3         |
| Unknown-income  | 689  | 4.3                                | 572                      | 3.9              | 108  | 10.1                 | 9                         | 5.2          |
| <b>Total Assessment Area</b>  | <b>15,956</b>  | <b>100.0</b>                       | <b>14,710</b>            | <b>100.0</b>     | <b>1,072</b>                                       | <b>100.0</b>         | <b>174</b>                | <b>100.0</b> |
|   | Percentage of Total Businesses:                          |                                    |                          |                  |  |                      |                           |              |
|   | 92.2   |                                    |                          |                  |  |                      |                           |              |
|   | Total Farms by Tract                                     | Farms by Tract & Revenue Size      |                          |                  |  |                      |                           |              |
|   |  | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
|   |  | #                                  | %                        | #                | %  | #                    | %                         |              |
| Low-income  | 10   | 4.7                                | 9                        | 4.3              | 1  | 33.3                 | 0                         | 0.0          |
| Moderate-income   | 16   | 7.5                                | 16                       | 7.7              | 0  | 0.0                  | 0                         | 0.0          |
| Middle-income   | 52   | 24.4                               | 50                       | 23.9             | 1  | 33.3                 | 1                         | 100.0        |
| Upper-income  | 126  | 59.2                               | 125                      | 59.8             | 1  | 33.3                 | 0                         | 0.0          |
| Unknown-income  | 9  | 4.2                                | 9                        | 4.3              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total Assessment Area</b>  | <b>213</b>   | <b>100.0</b>                       | <b>209</b>               | <b>100.0</b>     | <b>3</b>   | <b>100.0</b>         | <b>1</b>                  | <b>100.0</b> |
|   | Percentage of Total Farms:                               |                                    |                          |                  |  |                      |                           |              |
|   | 98.1   |                                    |                          |                  |  |                      |                           |              |
|   | 1.4  |                                    |                          |                  |  |                      |                           |              |
|   | 0.5  |                                    |                          |                  |  |                      |                           |              |
| 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**

Third Coast's lending test performance in the Beaumont-Port Arthur MSA AA is good.

For this evaluation, the bank's overall lending performance in the AA was carried by the small business lending given Third Coast's focus on commercial lending. Moreover, this product was the only one with a sufficient volume to allow for a meaningful analysis, comprising the largest volume of lending in the AA.

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

### **Lending Activity**

Third Coast's lending activity reflects adequate responsiveness to the credit needs of the AA. Though the bank makes limited use of innovative and/or flexible lending practices, the products offered appropriately serve the AA credit needs, including LMI borrowers. During the review period, Third Coast demonstrated flexible lending practices through participation in government-guaranteed lending programs and small business initiatives, including approximately \$3.9 million worth of SBA loan originations.

During the review period, Third Coast extended 348 small business, 24 home mortgage, and nine small farm loans. Due to the limited volume of home mortgage and small farm lending, a meaningful analysis of these products could not be conducted. As a result, the bank's lending performance in the AA is solely based on small business lending.

Tables related to the bank's home mortgage and small farm lending can be found in Appendix C.

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

The geographic distribution of Third Coast's small business lending was compared to aggregate lending data, available demographic information, and relevant performance context. Considering these factors, Third Coast's geographic distribution of loans reflects adequate penetration throughout the AA.

Loans originated by the bank during the review period were generally made in proximity to the bank's branch locations, which are in the cities of Beaumont and Port Arthur. Though some geographies in the extremities of the AA had a lower level of originations, no significant gaps were identified in the geographic distribution of the bank's lending.

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

### ***Small Business Lending***

The geographic distribution of small business loans reflects adequate penetration throughout the AA. Third Coast originated few small business loans to businesses located in low-income census tracts during the review period; however, aggregate lenders performed similarly. The low level of

small business lending is supported by applicable demographic data, as only nine of the 114 census tracts in the AA are designated as low-income, and these tracts contain less than four percent of the AA businesses, resulting in diminished lending opportunities compared to other categories of geographies.

Moderate-income census tracts include more than one quarter of the AA businesses, resulting in significantly higher demand for small business loans than in low-income tracts. The distribution of the bank's small business loans among moderate-income census tracts in the AA was below aggregate lenders' performance in 2022; however, it increased in 2023, surpassing aggregate lending data. The bank's increased performance is notable as aggregate lending decreased in moderate-income census tracts during the same period.

Table 27

| Distribution of 2022 and 2023 Small Business Lending by Income Level of Geography<br>Assessment Area: Beaumont-Port Arthur MSA |                                  |              |              |               |              |              |            |              |              |               |                          |              |              |
|--|----------------------------------|--------------|--------------|---------------|--------------|--------------|------------|--------------|--------------|---------------|--------------------------|--------------|--------------|
| Geographic<br>Income<br>Level  | Bank And Aggregate Loans By Year |              |              |               |              |              |            |              |              |               | Total<br>Businesses<br>% |              |              |
|  | 2022                             |              |              |               |              | 2023         |            |              |              |               |                          |              |              |
|  | Bank                             | Agg          | Bank         | Agg           |              | Bank         | Agg        | Bank         | Agg          |               |                          |              |              |
| #  | #%                               | #%           | \$ (000)     | \$ %          | \$ %         | #            | #%         | #%           | \$ (000)     | \$ %          | \$ %                     |              |              |
| <b>Low</b>   | 5                                | 2.5          | 3.8          | 1,535         | 3.0          | 2.8          | 4          | 2.7          | 4.0          | 1,115         | 2.8                      | 3.3          | 3.8          |
| <b>Moderate</b>  | 37                               | 18.7         | 22.2         | 10,420        | 20.5         | 24.0         | 35         | 23.3         | 21.8         | 11,582        | 28.7                     | 24.4         | 25.3         |
| <b>Middle</b>  | 39                               | 19.7         | 26.3         | 9,385         | 18.5         | 21.9         | 29         | 19.3         | 25.1         | 7,205         | 17.9                     | 20.0         | 26.7         |
| <b>Upper</b>   | 104                              | 52.5         | 42.3         | 25,237        | 49.7         | 42.6         | 70         | 46.7         | 43.0         | 16,247        | 40.3                     | 44.4         | 39.8         |
| <b>Unknown</b>   | 13                               | 6.6          | 4.4          | 4,151         | 8.2          | 8.5          | 12         | 8.0          | 5.2          | 4,198         | 10.4                     | 7.8          | 4.3          |
| <b>Total</b>   | <b>198</b>                       | <b>100.0</b> | <b>100.0</b> | <b>50,728</b> | <b>100.0</b> | <b>100.0</b> | <b>150</b> | <b>100.0</b> | <b>100.0</b> | <b>40,347</b> | <b>100.0</b>             | <b>100.0</b> | <b>100.0</b> |

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 Businesses of Different Revenue Sizes

Considering Third Coast's performance when compared to the aggregate, the borrower distribution of small business loans by revenue size of businesses is good. While the percentage of total businesses reporting annual revenues of \$1 million or less reflects a very high demographic figure that was not matched by the bank nor aggregate lenders, Third Coast's 2022 small business lending reflects distribution among small businesses that is above the performance of aggregate lenders in the AA. Despite a material volume of loans is categorized as revenue unknown, the bank's lending outperformed aggregate.

In 2023, the bank's lending to businesses with revenues of \$1 million or less decreased; however, this performance was comparable to that of aggregate lenders in the AA. While Third Coast remained well below the demographic figure, the bank's lending was near aggregate and reflects favorably upon the bank's responsiveness to the credit needs of small businesses in the AA.

Table 28

| Distribution of 2022 and 2023 Small Business Lending by Revenue Size of Businesses                                      |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |
|---|----------------------------------|-------|-------|--------|----------|-------|------|-------|-------|--------|----------|-------|--------------------|--|
| Assessment Area: Beaumont-Port Arthur MSA   |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |
|   | Bank And Aggregate Loans By Year |       |       |        |          |       |      |       |       |        |          |       | Total Businesses % |  |
|   | 2022                             |       |       |        |          |       | 2023 |       |       |        |          |       |                    |  |
|   | Bank                             |       | Agg   |        | Bank     |       | Agg  |       | Bank  |        | Agg      |       |                    |  |
|   | #                                | #%    | #%    | #%     | \$ (000) | \$ %  | \$ % | #     | #%    | #%     | \$ (000) | \$ %  | \$ %               |  |
| By Revenue  |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |
| <b>\$1 Million or Less</b>  | 97                               | 49.0  | 44.3  | 18,514 | 36.5     | 36.6  | 68   | 45.3  | 46.0  | 14,443 | 35.8     | 32.0  | 92.2               |  |
| <b>Over \$1 Million</b>   | 92                               | 46.5  |       | 30,470 | 60.1     |       | 77   | 51.3  |       | 25,565 | 63.4     |       | 6.7                |  |
| <b>Revenue Unknown</b>  | 9                                | 4.5   |       | 1,744  | 3.4      |       | 5    | 3.3   |       | 339    | 0.8      |       | 1.1                |  |
| <b>Total</b>  | 198                              | 100.0 |       | 50,728 | 100.0    |       | 150  | 100.0 |       | 40,347 | 100.0    |       | 100.0              |  |
| By Loan Size  |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |
| <b>\$100,000 or Less</b>  | 81                               | 40.9  | 90.0  | 5,123  | 10.1     | 30.4  | 61   | 40.7  | 90.5  | 3,918  | 9.7      | 32.2  |                    |  |
| <b>\$100,001 - \$250,000</b>  | 57                               | 28.8  | 5.5   | 10,925 | 21.5     | 19.7  | 40   | 26.7  | 5.4   | 7,346  | 18.2     | 19.8  |                    |  |
| <b>\$250,001 - \$1 Million</b>  | 60                               | 30.3  | 4.5   | 34,680 | 68.4     | 49.9  | 49   | 32.7  | 4.2   | 29,083 | 72.1     | 47.9  |                    |  |
| <b>Total</b>  | 198                              | 100.0 | 100.0 | 50,728 | 100.0    | 100.0 | 150  | 100.0 | 100.0 | 40,347 | 100.0    | 100.0 |                    |  |
| By Loan Size and Revenues \$1 Million or Less   |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |
| <b>\$100,000 or Less</b>  | 49                               | 50.5  |       | 2,951  | 15.9     |       | 39   | 57.4  |       | 2,404  | 16.6     |       |                    |  |
| <b>\$100,001 - \$250,000</b>  | 25                               | 25.8  |       | 4,685  | 25.3     |       | 11   | 16.2  |       | 2,117  | 14.7     |       |                    |  |
| <b>\$250,001 - \$1 Million</b>  | 23                               | 23.7  |       | 10,878 | 58.8     |       | 18   | 26.5  |       | 9,922  | 68.7     |       |                    |  |
| <b>Total</b>  | 97                               | 100.0 |       | 18,514 | 100.0    |       | 68   | 100.0 |       | 14,443 | 100.0    |       |                    |  |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |
| Note: Percentages may not total 100.0 percent due to rounding.  |                                  |       |       |        |          |       |      |       |       |        |          |       |                    |  |

### Community Development Lending

Third Coast makes an adequate level of CD loans in the AA. During the review period, the bank originated five qualified CD loans in the AA, totaling approximately \$17.3 million. This represents 11.9 percent of the bank's total CD lending, a level greater than the 5.5 percent of the bank's total deposits inside of the AA.

The number and dollar amount of the bank's qualified CD lending decreased compared to the previous evaluation, though this is attributable to the conclusion of the SBA's PPP in 2021. At the previous evaluation, the bank made 21 qualified loans through this program, representing 84 percent of the bank's CD loans and more than 98 percent of the total dollar amount originated during the prior review period. While Third Coast was unable to replace the activity conducted under the PPP, its CD lending increased during the review period. Additionally, the bank's CD lending shifted since the previous evaluation toward a focus on economic development through financing small businesses which better aligns with the bank's expertise as a commercial bank.

Table 29

| Community Development Lending             |          |               |
|---|----------|---------------|
| Assessment Area: Beaumont-Port Arthur MSA |          |               |
| Purpose                                   | #        | \$(000s)      |
| Affordable Housing                        | 1        | 735           |
| Community Services                        | 0        | 0             |
| Economic Development                      | 4        | 16,600        |
| Revitalization and Stabilization          | 0        | 0             |
| <b>Total</b>                              | <b>5</b> | <b>17,335</b> |

## INVESTMENT TEST

Third Coast's performance under the investment test in the Beaumont-Port Arthur MSA 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. Moreover, Third Coast 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.

As previously discussed, the significant majority of Third Coast's qualified CD investments made during the review period was to SBICs serving more than one of the delineated AAs. Two of these investments went to SBICs that provided funding to businesses in the Beaumont-Port Arthur MSA; however, the investments could not be segregated to be included in Table 30, as these funds were comingled with funds benefitting other AAs. Third Coast prior period's investment in a SBIC remained on its books, demonstrating that the longer-term nature of such an investment continued to represent activity supporting economic development within the AA. Additionally, the limited activity of donations extended reflected in Table 30 represents growth, as no donations were made in the AA during the previously review period.

Table 30

| Investment, Grants, and Donations<br>Assessment Area: Beaumont-Port Arthur MSA |                                       |            |                                  |          |           |           |          |            |
|--|---------------------------------------|------------|----------------------------------|----------|-----------|-----------|----------|------------|
| Community Development Purpose  | Prior Period Investments <sup>1</sup> |            | Current Investments <sup>2</sup> |          | Donations |           | Total    |            |
|  | #                                     | \$(000s)   | #                                | \$(000s) | #         | \$(000s)  | #        | \$(000s)   |
| Affordable Housing   | 0                                     | 0          | 0                                | 0        | 0         | 0         | 0        | 0          |
| Community Services   | 0                                     | 0          | 0                                | 0        | 3         | 11        | 3        | 11         |
| Economic Development   | 1                                     | 287        | 0                                | 0        | 0         | 0         | 1        | 287        |
| Revitalization and Stabilization   | 0                                     | 0          | 0                                | 0        | 0         | 0         | 0        | 0          |
| <b>Total</b>   | <b>1</b>                              | <b>287</b> | <b>0</b>                         | <b>0</b> | <b>3</b>  | <b>11</b> | <b>4</b> | <b>298</b> |

<sup>1</sup> Book value of investment

<sup>2</sup> Original market value of investment

## SERVICE TEST

Third Coast's service test performance is adequate.

### *Retail Services*

The bank's delivery systems are accessible to the geographies and individuals of different income levels in the AA. The distribution of the bank's two branch offices as of December 31, 2023, was compared to the distribution of the population and businesses among the tract categories within the AA. Table 31 below summarizes the bank's retail locations in the AA.

Table 31

| Branch and Full-Service ATM Locations<br>Assessment Area: Beaumont-Port Arthur MSA |                     |                    |                    |          |              |                      |              |
|--|---------------------|--------------------|--------------------|----------|--------------|----------------------|--------------|
| Tract<br>Income  | % of<br>Geographies | % of<br>Households | % of<br>Businesses | Branches |              | Full-Service<br>ATMs |              |
|  |                     |                    |                    | #        | %            | #                    | %            |
| Low  | 7.9                 | 6.3                | 3.8                | 0        | 0.0          | 0                    | 0.0          |
| Moderate   | 25.4                | 23.4               | 25.1               | 1        | 50.0         | 0                    | 0.0          |
| Middle   | 28.1                | 30.4               | 26.7               | 0        | 0.0          | 0                    | 0.0          |
| Upper  | 33.3                | 38.2               | 40.1               | 1        | 50.0         | 0                    | 0.0          |
| Unknown  | 5.3                 | 1.7                | 4.3                | 0        | 0.0          | 0                    | 0.0          |
| <b>Total</b>   | <b>100.0</b>        | <b>100.0</b>       | <b>100.0</b>       | <b>2</b> | <b>100.0</b> | <b>0</b>             | <b>100.0</b> |

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

Third Coast did not open or close any branches in the AA during the review period; as a result, its record of opening or closing branches was not evaluated to assess the accessibility of its delivery systems in the AA. Banking services and hours of operations do not vary in a way that inconveniences the AA, particularly LMI geographies and/or individuals. The level of branch services and hours offered are basically the same throughout the AA.

### **Community Development Services**

The bank provides an adequate level of CD services in the AA. Third Coast's employees provided 102 hours of service as members of boards of directors for two organizations offering CD services targeted to LMI individuals in the AA. These organizations provide a variety of community services to individuals and families in the AA who have experienced domestic violence or sexual assault. The increase in service hours in the AA compared to the previous evaluation reflects favorably on the bank's responsiveness to CD needs of the AA.

**AUSTIN METROPOLITAN ASSESSMENT AREA**  
(Full-Scope Review)

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

- The Austin Metropolitan AA consists of a portion of the Austin-Round Rock-Georgetown, TX MSA<sup>2</sup>, as it includes the entirety of Williamson County and omits the four remaining counties of the MSA (Bastrop, Caldwell, Hays, and Travis counties). Refer to Appendix A for an AA map and Appendix B for additional demographic data.
- The bank opened its Georgetown, TX branch location in June 2022, resulting in the delineation of the Austin Metropolitan AA for the first time. Moreover, the branch located in a low-income census tract.
- The AA is comprised of 135 census tracts: three low-, 29 moderate-, 63 middle-, and 40 upper-income census tracts.
- According to the June 30, 2023, FDIC Deposit Market Share Report for the AA, the bank holds 0.1 percent of the deposit market share, ranking 35<sup>th</sup> of 38 FDIC-insured financial institutions with offices operating within the AA.
- A representative of a local community development financial institution was contacted to obtain additional context related to the AA. It was noted that the Austin MSA is an increasingly expensive region and that the limited affordable housing options currently available are unable to meet the needs of the AAs growing population.

**Table 32**

| Population Change<br>Assessment Area: Austin Metropolitan |                    |                    |                   |
|---|--------------------|--------------------|-------------------|
| Area  | 2015<br>Population | 2020<br>Population | Percent<br>Change |
| Austin Metropolitan                                       | 473,592            | 609,017            | 28.6              |
| Austin-Round Rock-Georgetown, TX MSA                      | 1,889,094          | 2,283,371          | 20.9              |
| Texas   | 26,538,614         | 29,145,505         | 9.8               |

Source: 2020 U.S. Census Bureau Decennial Census  
2011-2015 U.S. Census Bureau: American Community Survey

- The AA population grew between 2015 and 2020 at a rate almost three times higher than that of the state of Texas. Much of this growth is attributed to the AA's proximity to the city of Austin, which has been among the fastest growing cities in the nation for several years given substantial growth in the technology sector. According to the community contact, residents moving to the area often seek a less congested place to live, drawing them north to Williamson County.
- Population totals in the AA continued to grow between 2020 and 2023, with U.S. Census Bureau data indicating that between April 1, 2020 and July 1, 2023. Williamson County ranked eighth among the more than 3,000 U.S. counties for numeric population growth, further highlighting the influx of residents to the AA.
- The MSA grew by approximately 7.5 percent between 2020 and 2023, ranking second among Texas MSAs for population growth percentage during that time.

<sup>2</sup> On July 21, 2023, OMB Bulletin No. 23-01 renamed the Austin-Round Rock-Georgetown, TX MSA to the Austin-Round Rock-San Marcos, TX MSA. This report utilizes the earlier name, as it is accurate for the majority of the review period and reflected in the data and associated tables.

Table 33

| Median Family Income Change<br>Assessment Area: Austin Metropolitan |                                   |                                   |                   |
|---|-----------------------------------|-----------------------------------|-------------------|
| Area  | 2015 Median<br>Family Income (\$) | 2020 Median<br>Family Income (\$) | Percent<br>Change |
| Austin Metropolitan   | 92,692                            | 104,621                           | 12.9              |
| Austin-Round Rock-Georgetown, TX MSA                                | 86,310                            | 100,215                           | 16.1              |
| Texas   | 68,523                            | 76,073                            | 11.0              |

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

- As Table 33 illustrates, the MFI in the AA grew between 2015 and 2020 at a faster pace than the 9.2 percent cumulative inflation rate during the same period.
- The growth in the MFI of the AA was comparable to the statewide rate, but below the growth rate of the Austin-Round Rock-Georgetown, TX MSA, which reflected the largest dollar growth in MFI of any MSA in the state of Texas between 2015 and 2020.
- According to 2023 FFIEC estimates, the MFI for the Austin-Round Rock-Georgetown, TX MSA continued to lead the state between 2020 and 2023, growing by an additional \$22,000 (22.0 percent), highlighting that the economic boom in the area has not slowed following the COVID-19 pandemic.

Table 34

| Housing Cost Burden<br>Assessment Area: Austin Metropolitan |                       |                 |             |                      |                 |            |
|---|-----------------------|-----------------|-------------|----------------------|-----------------|------------|
| Area  | Cost Burden - Renters |                 |             | Cost Burden - Owners |                 |            |
|   | Low-Income            | Moderate-Income | All Renters | Low-Income           | Moderate-Income | All Owners |
| Austin Metropolitan   | 87.1                  | 44.8            | 41.0        | 71.5                 | 40.0            | 18.8       |
| Austin-Round Rock-Georgetown, TX MSA                        | 82.8                  | 44.6            | 42.9        | 67.0                 | 36.6            | 20.4       |
| Texas   | 78.3                  | 44.6            | 42.7        | 57.3                 | 31.0            | 19.0       |

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

- The housing cost burden for LMI persons in the AA is higher than the Austin-Round Rock-Georgetown, TX MSA and statewide figures in all relevant categories. The largest disparities are seen among low-income residents.
- As noted in Table 34, the AA low-income renters experience the highest housing cost burden. Other barriers to homeownership, such as downpayment requirements, inhibit LMI renters from transitioning to home ownership, where the housing cost burdens are generally lighter.
- The median housing value in the AA is \$282,651 as of 2020, approximately seven percent lower than the median housing value in the MSA, though both areas reflect housing values significantly higher than the statewide average of \$187,200.
- The median age of the housing stock in the AA, 18 years as of 2020, is also notably below the statewide median of 33 years, reflecting the significant level of new home construction that has taken place in response to the growing population.

Table 35

| Area                                 | Unemployment Rates |      |      |      |      |
|--------------------------------------|--------------------|------|------|------|------|
|                                      | 2018               | 2019 | 2020 | 2021 | 2022 |
| Austin Metropolitan                  | 3.1                | 2.8  | 5.8  | 4.0  | 2.9  |
| Austin-Round Rock-Georgetown, TX MSA | 3.0                | 2.7  | 6.2  | 4.1  | 2.9  |
| Texas                                | 3.9                | 3.5  | 7.7  | 5.6  | 3.9  |

Source: *Bureau of Labor Statistics: Local Area Unemployment Statistics*

- The unemployment rate for the AA peaked in 2020 due to the impact of the COVID-19 pandemic and the mitigation efforts undertaken by state and local governments to minimize contagion. As reflected in Table 35, the AA unemployment rates reached pre-pandemic levels in 2022.
- Unemployment rates for the AA were consistently below the statewide figures between 2018 and 2022, reflecting the strength of the local economy across that period.
- The AA is home to many large employers including Dell Computers, Southwestern University, Georgetown Healthcare System, the Round Rock Medical Center, and Round Rock Independent School District.

Table 36 details selected characteristics of the AA.

Table 36

| 2023 Combined Demographics<br>Assessment Area: Austin Metropolitan |                                    |                |                          |              |  |              |                           |              |
|--|------------------------------------|----------------|--------------------------|--------------|--|--------------|---------------------------|--------------|
| Income Categories  | Tract Distribution                 |                | Families by Tract Income |              | Families < Poverty Level as % of Families by Tract |              | Families by Family Income |              |
|  | #                                  | %              | #                        | %            | #  | %            | #                         | %            |
| Low-income   | 3                                  | 2.2            | 2,193                    | 1.6          | 123  | 5.6          | 23,721                    | 17.4         |
| Moderate-income  | 29                                 | 21.5           | 23,035                   | 16.9         | 1,601  | 7.0          | 23,873                    | 17.5         |
| Middle-income  | 63                                 | 46.7           | 65,859                   | 48.4         | 2,945  | 4.5          | 31,035                    | 22.8         |
| Upper-income   | 40                                 | 29.6           | 45,005                   | 33.1         | 899  | 2.0          | 57,463                    | 42.2         |
| Unknown-income   | 0                                  | 0.0            | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| <b>Total Assessment Area</b>                                       | <b>135</b>                         | <b>100.0</b>   | <b>136,092</b>           | <b>100.0</b> | <b>5,568</b>                                       | <b>4.1</b>   | <b>136,092</b>            | <b>100.0</b> |
| Housing Units by Tract   | Housing Types by Tract             |                |                          |              |  |              |                           |              |
|  | Owner-Occupied                     |                | Rental                   |              | Vacant   |              |                           |              |
|  | #                                  | %              | %                        | #            | %  | #            | %                         |              |
| Low-income   | 4,244                              | 942            | 0.7                      | 22.2         | 2,770  | 65.3         | 532                       | 12.5         |
| Moderate-income  | 39,994                             | 17,174         | 13.4                     | 42.9         | 19,279   | 48.2         | 3,541                     | 8.9          |
| Middle-income  | 98,606                             | 64,324         | 50.2                     | 65.2         | 29,259   | 29.7         | 5,023                     | 5.1          |
| Upper-income   | 56,217                             | 45,800         | 35.7                     | 81.5         | 8,565  | 15.2         | 1,852                     | 3.3          |
| Unknown-income   | 0                                  | 0              | 0.0                      | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| <b>Total Assessment Area</b>                                       | <b>199,061</b>                     | <b>128,240</b> | <b>100.0</b>             | <b>64.4</b>  | <b>59,873</b>                                      | <b>30.1</b>  | <b>10,948</b>             | <b>5.5</b>   |
| Total Businesses by Tract  | Businesses by Tract & Revenue Size |                |                          |              |  |              |                           |              |
|  | Less Than or = \$1 Million         |                | Over \$1 Million         |              | Revenue Not Reported                               |              |                           |              |
|  | #                                  | %              | #                        | %            | #  | %            | #                         | %            |
| Low-income   | 986                                | 3.7            | 879                      | 3.5          | 91   | 7.2          | 16                        | 5.3          |
| Moderate-income  | 5,042                              | 18.8           | 4,666                    | 18.5         | 325  | 25.8         | 51                        | 16.8         |
| Middle-income  | 12,361                             | 46.2           | 11,697                   | 46.4         | 550  | 43.7         | 114                       | 37.6         |
| Upper-income   | 8,367                              | 31.3           | 7,952                    | 31.6         | 293  | 23.3         | 122                       | 40.3         |
| Unknown-income   | 0                                  | 0.0            | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| <b>Total Assessment Area</b>                                       | <b>26,756</b>                      | <b>100.0</b>   | <b>25,194</b>            | <b>100.0</b> | <b>1,259</b>                                       | <b>100.0</b> | <b>303</b>                | <b>100.0</b> |
| Percentage of Total Businesses:                                    |                                    | 94.2           |                          |              | 4.7  |              |                           | 1.1          |
| Total Farms by Tract   | Farms by Tract & Revenue Size      |                |                          |              |  |              |                           |              |
|  | Less Than or = \$1 Million         |                | Over \$1 Million         |              | Revenue Not Reported                               |              |                           |              |
|  | #                                  | %              | #                        | %            | #  | %            | #                         | %            |
| Low-income   | 6                                  | 1.6            | 5                        | 1.4          | 1  | 20.0         | 0                         | 0.0          |
| Moderate-income  | 94                                 | 25.5           | 90                       | 24.8         | 4  | 80.0         | 0                         | 0.0          |
| Middle-income  | 179                                | 48.6           | 179                      | 49.3         | 0  | 0.0          | 0                         | 0.0          |
| Upper-income   | 89                                 | 24.2           | 89                       | 24.5         | 0  | 0.0          | 0                         | 0.0          |
| Unknown-income   | 0                                  | 0.0            | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| <b>Total Assessment Area</b>                                       | <b>368</b>                         | <b>100.0</b>   | <b>363</b>               | <b>100.0</b> | <b>5</b>   | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| Percentage of Total Farms:   |                                    | 98.6           |                          |              | 1.4  |              |                           | 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**

Third Coast's lending test performance in the Austin Metropolitan AA is adequate.

For this evaluation, the bank's overall lending test performance in the AA is based primarily on the bank's CD lending due to the limited lending noted. The limited volume of lending is expected as the bank opened a branch in the AA in June 2022. Details of the bank's home mortgage, small business, and small farm lending and information regarding lending by aggregate lenders can be found in Appendix C.

#### ***Lending Activity***

Third Coast's lending activity reflects adequate responsiveness to the AA credit needs. Though the bank makes limited use of innovative and/or flexible lending practices, the products it offers are appropriate to serve AA credit needs, including LMI borrowers.

The total volume of loans in the AA during the review period was low, consisting of four home mortgage and eight small business loans. This level of activity is commensurate with the bank's presence in the AA, operating a single branch representing a deposit market share of 0.1 percent. Additionally, the bank is new to the AA since the previous evaluation, its position among the 38 financial institutions operating in the AA, including very large national banks, is not well established.

#### ***Geographic Distribution of Loans and Lending to Borrowers of Different Income Levels and Businesses of Different Revenue Sizes***

During the review period, Third Coast did not originate a sufficient volume of home mortgage or small business loans in the AA to allow for a meaningful analysis of the distribution of the bank's lending. As a result, this criterion was not evaluated as part of the bank's overall lending performance in the AA.

#### ***Community Development Lending***

Third Coast makes a low level of CD loans in the AA. During the review period, the bank originated only one qualified loan totaling \$3 million in the AA. Despite the limited activity, this represents an increase in qualified CD lending from the previous evaluation, as the bank did not have a presence in the AA in the prior evaluation and had not extended any qualified loans in Williamson County.

The bank's single qualified loan in the AA was for the rehabilitation of property in a moderate-income census tract to establish a restaurant that would attract other businesses to the geography. The extensive size and diversity of the AA provides sufficient opportunities for all financial institutions operating in the area to engage with identified CD needs. While the bank's activity served the qualifying purpose of revitalizing an LMI geography, it does not reflect favorably on the bank's responsiveness to the needs of the AA, despite the bank's relative newness in the area and the number of institutions already serving it.

### INVESTMENT TEST

Third Coast's performance under the investment test in the Austin Metropolitan AA is poor, as it has few qualified CD investments and grants, makes rare use of innovative and/or complex investments to support CD initiatives, and exhibits poor responsiveness to the CD needs of the AA. During the review period, the bank only made four qualified donations totaling approximately \$7,000. Third Coast's CD activity during this review period does not reflect favorably on the bank's responsiveness to CD needs and opportunities in the AA despite its newness to the AA.

Table 37

| Investment, Grants, and Donations<br>Assessment Area: Austin Metropolitan |                                       |          |                                  |          |           |          |          |          |
|---|---------------------------------------|----------|----------------------------------|----------|-----------|----------|----------|----------|
| Community Development Purpose   | Prior Period Investments <sup>1</sup> |          | Current Investments <sup>2</sup> |          | Donations |          | Total    |          |
|   | #                                     | \$(000s) | #                                | \$(000s) | #         | \$(000s) | #        | \$(000s) |
| Affordable Housing  | 0                                     | 0        | 0                                | 0        | 0         | 0        | 0        | 0        |
| Community Services  | 0                                     | 0        | 0                                | 0        | 1         | 2        | 1        | 2        |
| Economic Development  | 0                                     | 0        | 0                                | 0        | 0         | 0        | 0        | 0        |
| Revitalization and Stabilization  | 0                                     | 0        | 0                                | 0        | 3         | 5        | 3        | 5        |
| <b>Total</b>  | <b>0</b>                              | <b>0</b> | <b>0</b>                         | <b>0</b> | <b>4</b>  | <b>7</b> | <b>4</b> | <b>7</b> |

<sup>1</sup> Book value of investment  
<sup>2</sup> Original market value of investment

### SERVICE TEST

Third Coast's service test performance in the Austin Metropolitan AA is adequate.

#### Retail Services

Third Coast's delivery systems are accessible to the bank's geographies and individuals of different income levels in the AA. The bank operated only one branch in the AA as of December 31, 2023, which was compared to the distribution of the population and businesses among the tract categories within the AA. Table 38 summarizes the bank's retail locations in the AA.

Table 38

| Branch and Full-Service ATM Locations<br>Assessment Area: Austin Metropolitan |                  |                 |                 |          |              |                   |              |
|---|------------------|-----------------|-----------------|----------|--------------|-------------------|--------------|
| Tract Income  | % of Geographies | % of Households | % of Businesses | Branches |              | Full-Service ATMs |              |
|   |                  |                 |                 | #        | %            | #                 | %            |
| Low   | 2.2              | 2.0             | 3.7             | 1        | 100.0        | 1                 | 100.0        |
| Moderate  | 21.5             | 19.4            | 18.9            | 0        | 0.0          | 0                 | 0.0          |
| Middle  | 46.7             | 49.7            | 46.2            | 0        | 0.0          | 0                 | 0.0          |
| Upper   | 29.6             | 28.9            | 31.2            | 0        | 0.0          | 0                 | 0.0          |
| Unknown   | 0.0              | 0.0             | 0.0             | 0        | 0.0          | 0                 | 0.0          |
| <b>Total</b>  | <b>100.0</b>     | <b>100.0</b>    | <b>100.0</b>    | <b>1</b> | <b>100.0</b> | <b>1</b>          | <b>100.0</b> |

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

Third Coast's branch in Georgetown, TX, is near Interstate 35, the main thoroughfare in the AA. The branch is located within a low-income census tract surrounded by a mixture of moderate-, middle-, and upper-income geographies.

The AA was first delineated by the bank when it opened its Georgetown location in June 2022. The bank did not open or close any branches in the AA after its initial delineation. As a result, the bank's record of opening or closing branches has not adversely affected the accessibility of its delivery systems, including to LMI income geographies. Because Third Coast operates a single branch, its banking services and hours of operations do not vary in a way that inconveniences the AA, particularly in LMI geographies and/or to LMI individuals.

***Community Development Services***

Third Coast provides a limited level of CD services in the AA. The bank's employees provided 32 hours of service as volunteers for a community organization that offers CD services focused on assisting LMI individuals and families in crisis. While Third Coast provided a low level of services in an area with ample opportunity, it is commensurate with the bank's newly established and still limited presence in the AA and does not necessarily reflect negatively on its responsiveness to the CD needs of this AA.

## METROPOLITAN ASSESSMENT AREAS (Limited-Scope Review)

### DESCRIPTION OF OPERATIONS

#### Dallas-Fort Worth Metropolitan Assessment Area

- As of December 31, 2023, Third Coast operated three branches in the AA, representing 18.8 percent of its total branches.
- The AA is comprised of the entirety of Collin, Dallas, and Tarrant counties, which make up part of the Dallas-Fort Worth-Arlington, TX MSA.
- As of June 30, 2023, the bank had \$124.2 million in deposits in this AA, representing a market share of less than 0.1 percent and 3.6 percent of its total deposits.
- In 2023, 982 institutions originated or purchased 113,322 HMDA-reportable loans in the DFW Metropolitan AA. Third Coast ranked 221<sup>st</sup>, with 11 home mortgage originations that represent less than 0.1 percent of total reportable loans in the AA.
- In 2023, Third Coast ranked 92<sup>nd</sup> among 277 institutions originating or purchasing CRA-reportable loans in the AA. Of the 180,695 CRA-reportable loans made in the AA, the bank originated 25 or less than 0.1 percent.
- According to the ACS, the AA consists of 1,314 census tracts: 144 low-, 372 moderate-, 362 middle-, 415 upper-, and 21 unknown-income tracts.
- The 2020 AA population of 5,788,644 represented 19.9 percent of the state's population.
- The AA includes 1,370,139 families, 23.7 percent are low-, 17.8 percent are moderate-, 19.1 percent are middle-, and 39.5 percent are upper-income.

#### San Antonio Metropolitan Assessment Area

- As of December 31, 2023, Third Coast operated two branches in the AA, representing 12.5 percent of its total branches.
- The AA is comprised of the entirety of Bexar, Guadalupe, and Wilson counties, which are part of the San Antonio-New Braunfels, TX MSA.
- As of June 30, 2023, the bank had \$98.7 million in deposits in this AA, representing a market share of less than 0.1 percent and 2.9 percent of its total deposits.
- In 2023, 691 institutions originated or purchased 55,607 HMDA-reportable loans in the AA. Third Coast ranked 146<sup>th</sup>, with four home mortgage originations that represent less than 0.1 percent of total reportable loans.
- In 2023, the bank ranked 49<sup>th</sup> among 180 institutions originating or purchasing CRA-reportable loans in the AA. Of the 45,736 CRA-reportable loans made in the AA, the bank originated 36, or less than 0.1 percent.
- According to the ACS, the AA consists of 428 census tracts: 36 low-, 141 moderate-, 128 middle-, 118 upper-, and five unknown-income tracts.
- The 2020 AA population of 2,231,783 represented 7.7 percent of the state's population.
- The AA includes 476,712 families, of which 22.9 percent are low-, 17.6 percent are moderate-, 19.6 percent are middle-, and 39.8 percent are upper-income.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Additional information regarding detailed demographic information and the HMDA and CRA lending for the metropolitan limited-scope AAs can be found in Appendix D.

Table 39 discusses conclusions regarding performance.

**Table 39**

| <b>Assessment Area</b>         | <b>Lending Test</b> | <b>Investment Test</b> | <b>Service Test</b> |
|--------------------------------|---------------------|------------------------|---------------------|
| Dallas-Fort Worth Metropolitan | Consistent          | Below                  | Consistent          |
| San Antonio Metropolitan       | Consistent          | Consistent             | Below               |

The bank's lending, investment, and service performance in the AAs is generally consistent with the institution's overall lending, investment, and service performance.

**NONMETROPOLITAN ASSESSMENT AREAS**  
(Limited-Scope Review)**DESCRIPTION OF OPERATIONS****Detroit Nonmetropolitan Assessment Area**

- As of December 31, 2023, the bank operated one branch in the AA, representing 6.3 percent of its total branches.
- The AA is comprised of the entirety of Lamar and Red River counties, non-metropolitan counties in North Texas.
- As of June 30, 2023, the bank had \$19.4 million in deposits in this AA, representing a market share of 1.1 percent and 0.6 percent of its total deposits.
- In 2023, 147 institutions originated or purchased 704 HMDA-reportable loans in the AA. Additionally, 59 institutions originated or purchased 1,455 CRA-reportable loans. The bank did not originate any HMDA or CRA-reportable loans.
- According to the ACS, the AA consists of 18 census tracts: one low-, five moderate-, nine middle-, and three upper-income tracts.
- The 2020 AA population of 61,675 represented 0.2 percent of the state's population.
- The AA includes 16,731 families, of which 24.1 percent are low-, 17.7 percent moderate-, 21.4 percent middle-, and 36.9 percent are upper-income.

**Nixon Nonmetropolitan Assessment Area**

- As of December 31, 2023, Third Coast operated one branch in the AA, representing 6.3 percent of its total branches.
- The AA is comprised of the entirety of Gonzales County, a non-metropolitan county.
- As of June 30, 2023, the bank had \$57.2 million in deposits in this AA, representing a market share of 8.1 percent and 1.7 percent of its total deposits.
- In 2023, 74 institutions originated or purchased 218 HMDA-reportable loans in the AA. The bank originated no HMDA-reportable loans in the AA in 2023.
- In 2023, the bank ranked 14th among 39 institutions originating or purchasing CRA-reportable loans in the AA. Of the 296 CRA-reportable loans made in the AA, the bank originated one, or approximately 0.3 percent.
- According to the ACS, the AA consists of six census tracts, all of which are designated as middle-income.
- The AA population of 19,653 represents approximately 0.1 percent of the state's population.
- The AA includes 5,257 families, of which 19.2 percent are low-, 17.8 percent moderate-, 21.9 percent middle-, and 41.1 percent are upper-income.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS**

Additional information regarding detailed demographic information and the HMDA and CRA lending for the nonmetropolitan limited-scope AAs can be found in Appendix E.

Table 40 discusses conclusions regarding the bank's performance.

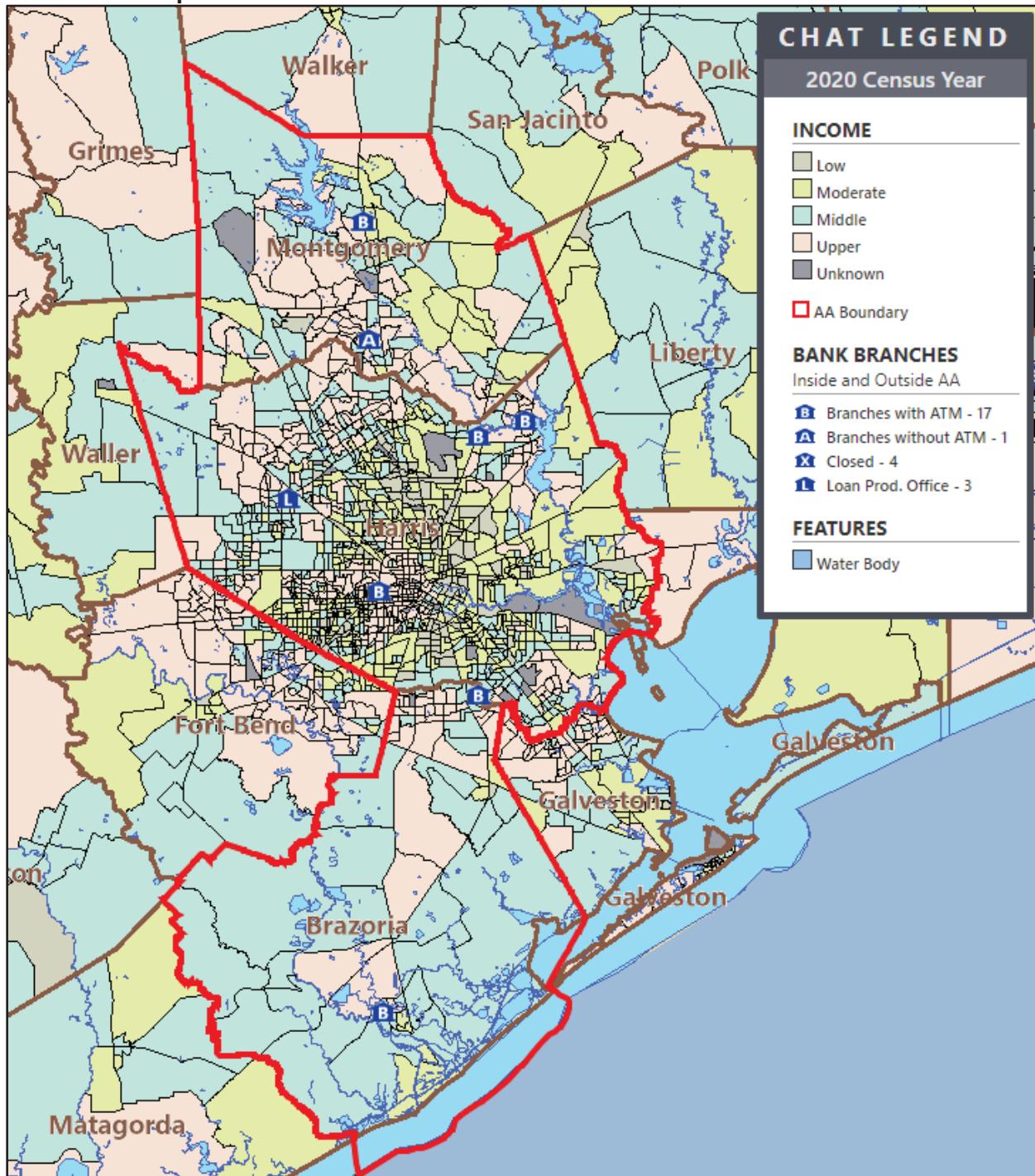
**Table 40**

| <b>Assessment Area</b>  | <b>Lending Test</b> | <b>Investment Test</b> | <b>Service Test</b> |
|-------------------------|---------------------|------------------------|---------------------|
| Detroit Nonmetropolitan | Consistent          | Below                  | Consistent          |
| Nixon Nonmetropolitan   | Consistent          | Below                  | Below               |

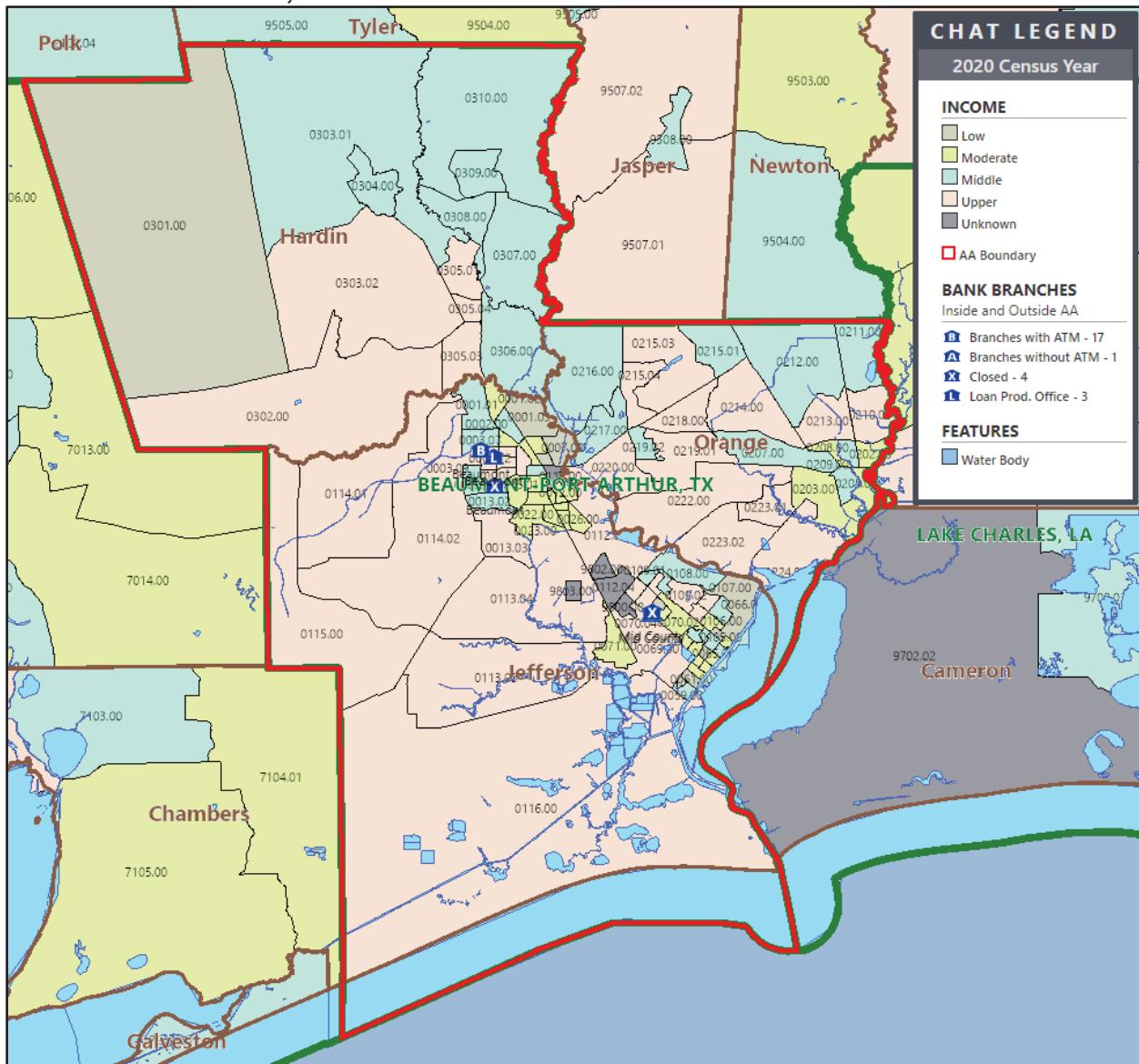
The bank's lending and service test performance in the AAs is generally consistent with the overall lending and service performance and does not impact the assessed rating. Third Coast's investment test performance in the limited-scop AAs is below the bank's overall investment test performance, however the lower volume of identified investment opportunities in these geographies limits the impact on the assessed rating.

## APPENDIX A – MAPS OF THE ASSESSMENT AREAS

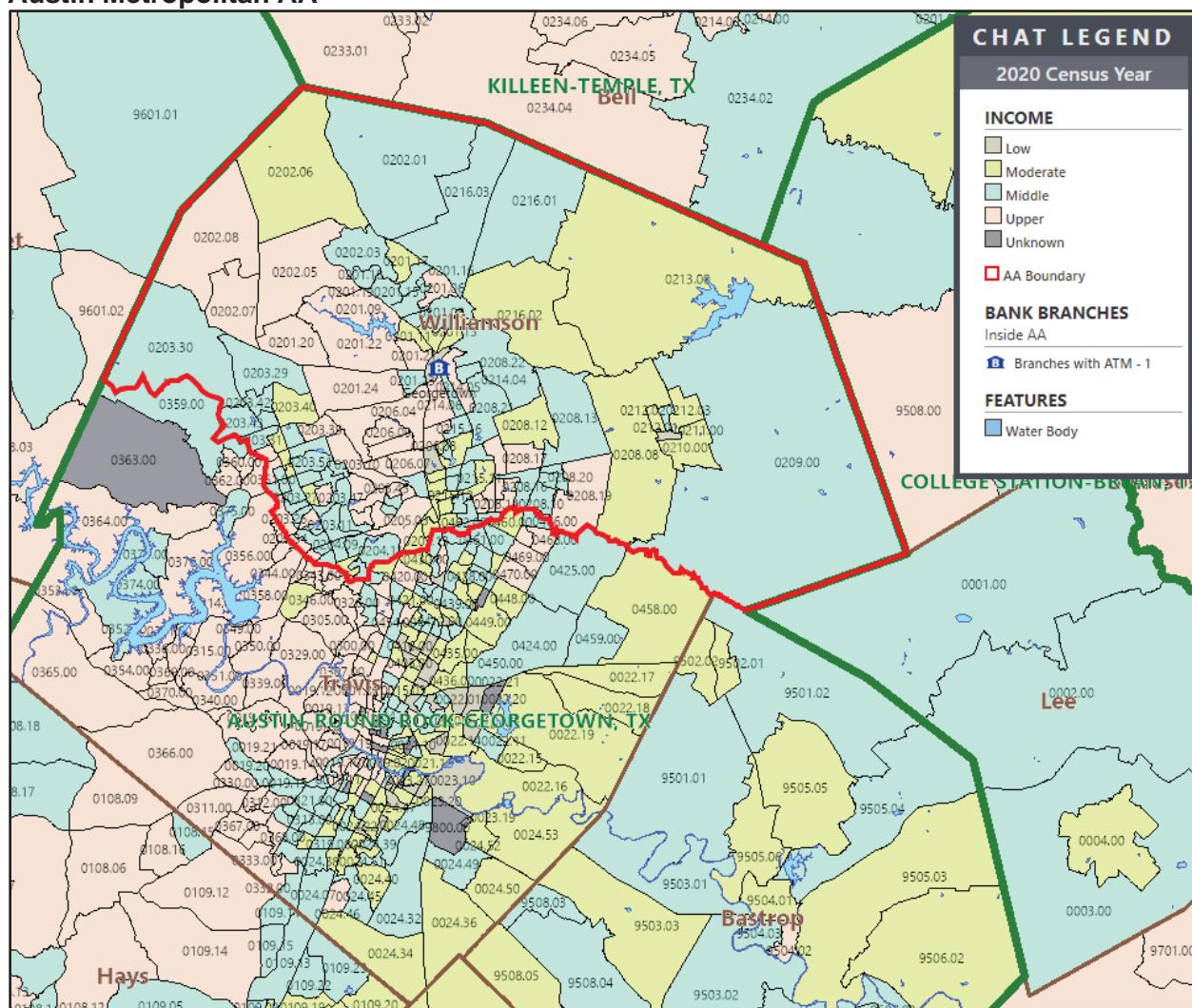
## Houston Metropolitan AA



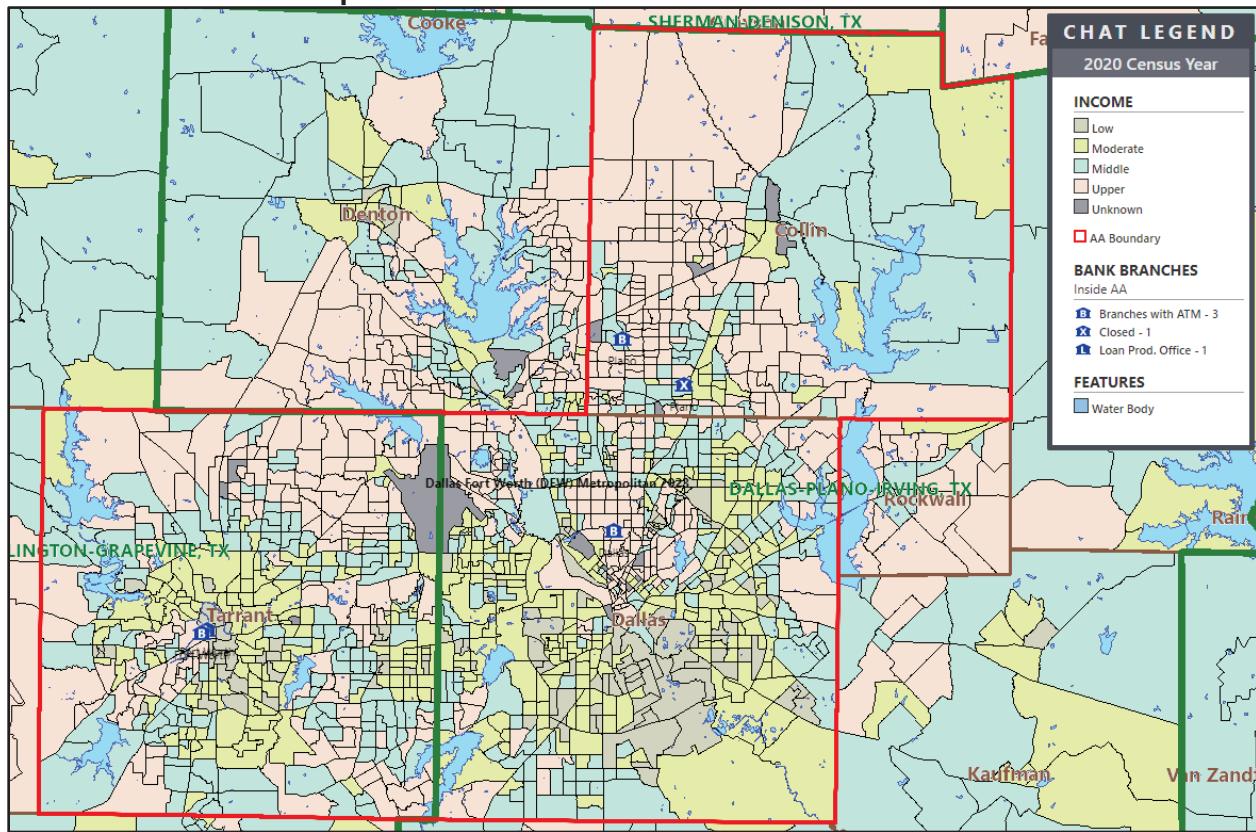
## **Beaumont-Port Arthur, TX MSA AA**



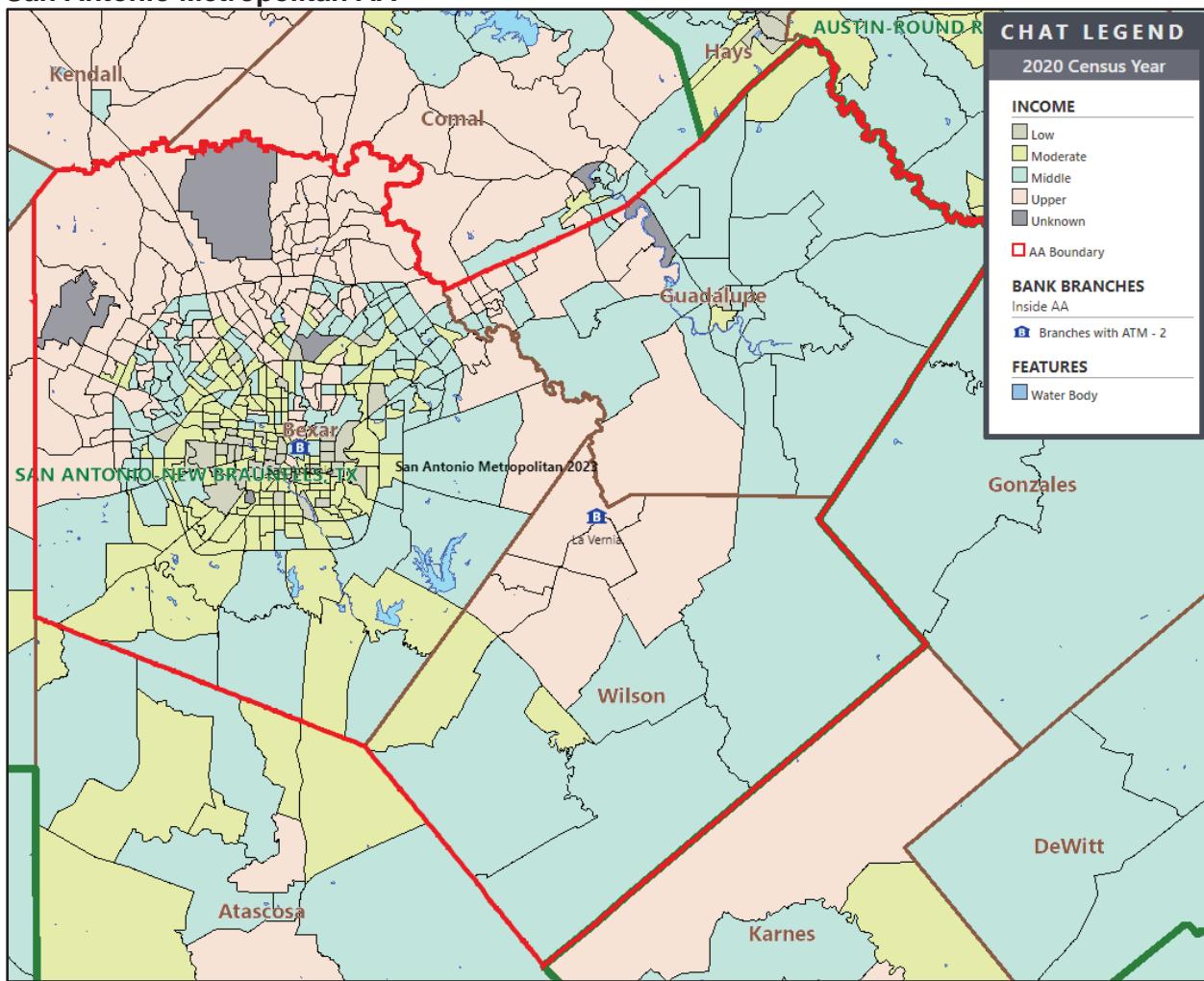
## Austin Metropolitan AA



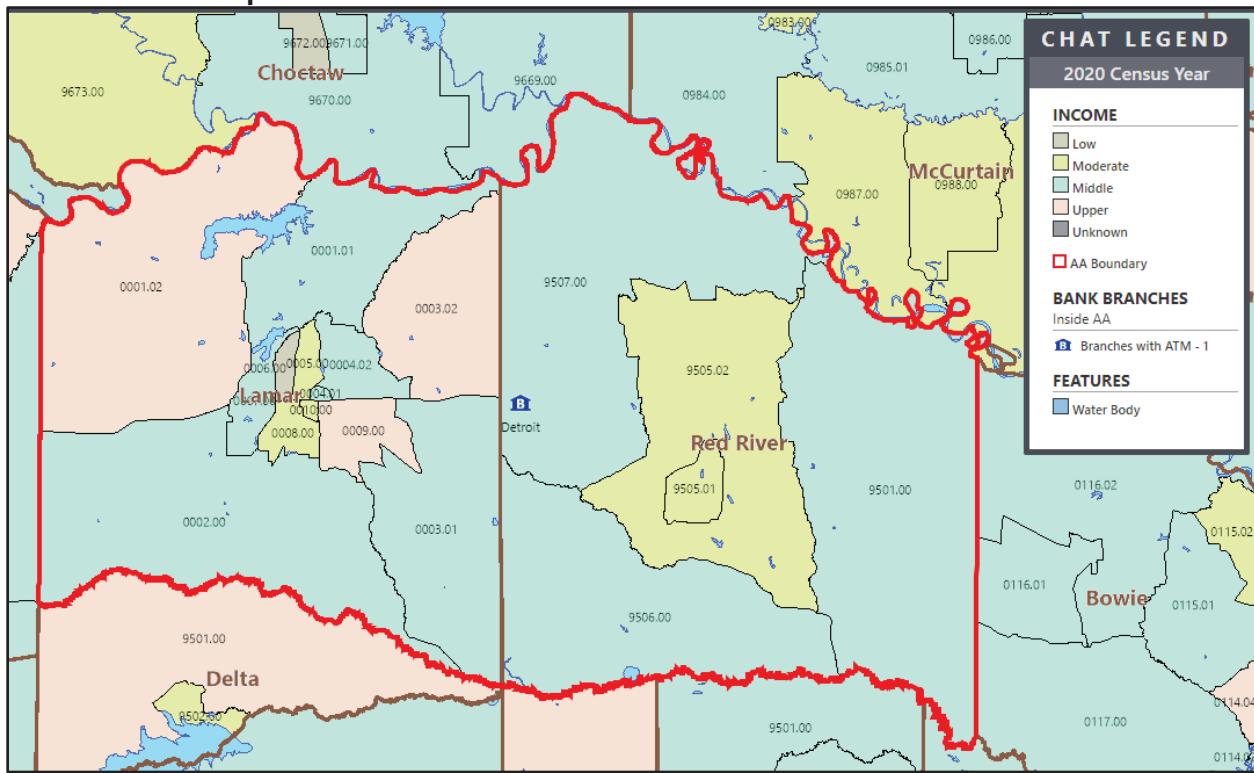
## Dallas-Fort Worth Metropolitan AA



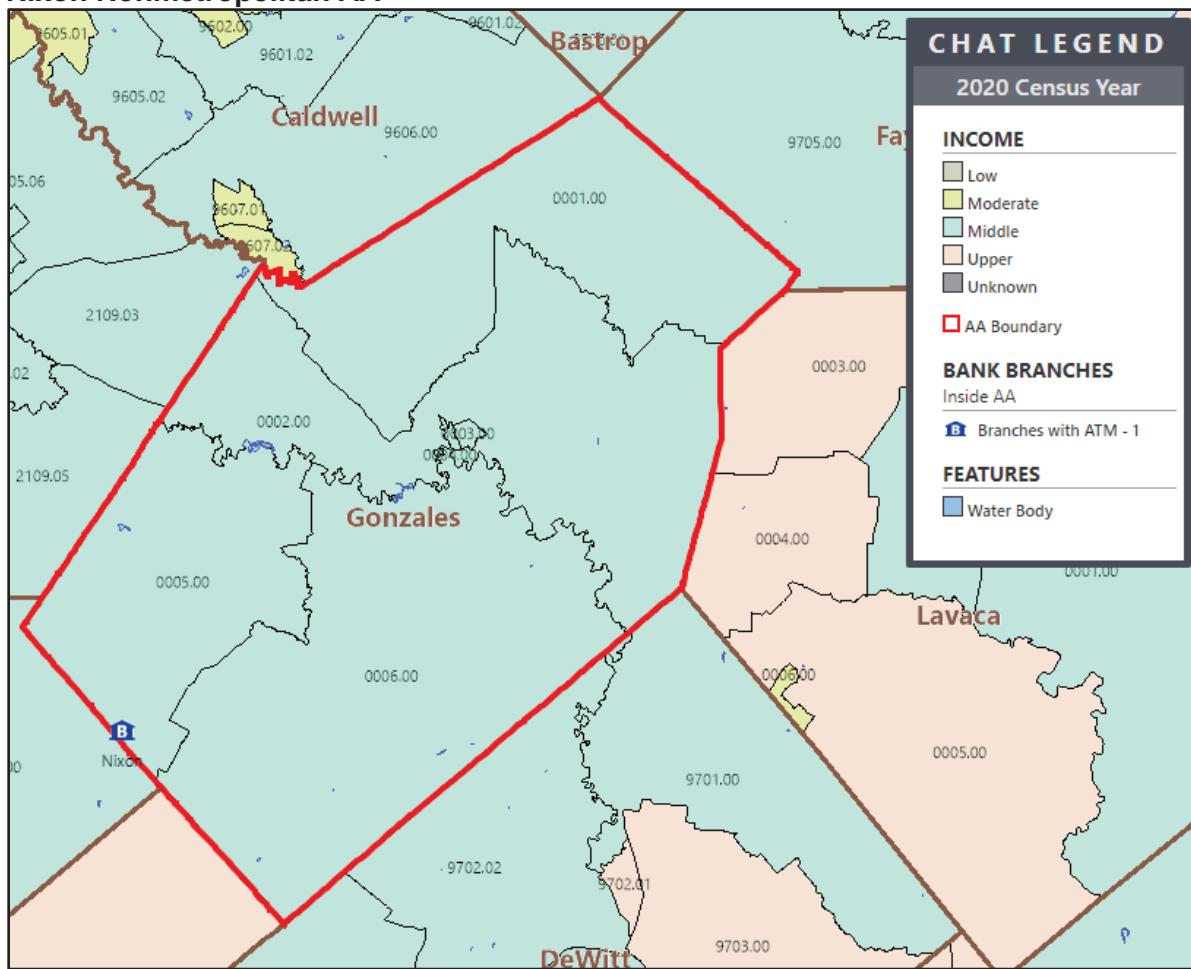
## San Antonio Metropolitan AA



## Detroit Nonmetropolitan AA



## Nixon Nonmetropolitan AA



## APPENDIX B – DEMOGRAPHIC INFORMATION OF FULL-SCOPE ASSESSMENT AREAS

## Houston Metropolitan AA

Table B-1

| 2022 AA Combined Demographics<br>Assessment Area: Houston Metropolitan  |                                    |            |                          |       |  |       |                           |       |
|---|------------------------------------|------------|--------------------------|-------|--|-------|---------------------------|-------|
| Income Categories   | Tract Distribution                 |            | Families by Tract Income |       | Families < Poverty Level as % of Families by Tract |       | Families by Family Income |       |
|   | #                                  | %          | #                        | %     | #  | %     | #                         | %     |
| Low   | 209                                | 15.8       | 164,943                  | 12.1  | 53,458   | 32.4  | 344,259                   | 25.3  |
| Moderate  | 341                                | 25.7       | 331,821                  | 24.4  | 54,035   | 16.3  | 234,668                   | 17.3  |
| Middle  | 345                                | 26.0       | 396,581                  | 29.2  | 30,141   | 7.6   | 244,653                   | 18.0  |
| Upper   | 387                                | 29.2       | 448,165                  | 32.9  | 14,779   | 3.3   | 536,571                   | 39.4  |
| Unknown   | 44                                 | 3.3        | 18,641                   | 1.4   | 4,345  | 23.3  | 0                         | 0.0   |
| Total AA  | 1,326                              | 100.0      | 1,360,151                | 100.0 | 156,758  | 11.5  | 1,360,151                 | 100.0 |
| Housing Units by Tract  | Housing Type by Tract              |            |                          |       |  |       |                           |       |
|   | Owner-occupied                     |            |                          |       | Rental   |       | Vacant                    |       |
|   | #                                  | % by tract | % by unit                | #     | % by unit  | #     | % by unit                 |       |
| Low   | 291,368                            | 69,912     | 6.2                      | 24.0  | 184,798  | 63.4  | 36,658                    | 12.6  |
| Moderate  | 531,529                            | 237,574    | 20.9                     | 44.7  | 244,568  | 46.0  | 49,387                    | 9.3   |
| Middle  | 601,872                            | 356,313    | 31.4                     | 59.2  | 196,021  | 32.6  | 49,538                    | 8.2   |
| Upper   | 686,906                            | 460,217    | 40.5                     | 67.0  | 176,278  | 25.7  | 50,411                    | 7.3   |
| Unknown   | 46,605                             | 11,948     | 1.1                      | 25.6  | 28,023   | 60.1  | 6,634                     | 14.2  |
| Total AA  | 2,158,280                          | 1,135,964  | 100.0                    | 52.6  | 829,688  | 38.4  | 192,628                   | 8.9   |
| Total Businesses by Tract   | Businesses by Tract & Revenue Size |            |                          |       |  |       |                           |       |
|   | Less Than or = \$1 Million         |            |                          |       | Over \$1 Million                                   |       | Revenue Not Reported      |       |
|   | #                                  | %          | #                        | %     | #  | %     | #                         | %     |
| Low   | 31,979                             | 10.4       | 28,938                   | 10.3  | 2,808  | 12.8  | 233                       | 6.4   |
| Moderate  | 64,811                             | 21.1       | 58,937                   | 20.9  | 5,358  | 24.4  | 516                       | 14.2  |
| Middle  | 78,361                             | 25.5       | 72,882                   | 25.9  | 4,747  | 21.6  | 732                       | 20.2  |
| Upper   | 125,869                            | 41.0       | 115,280                  | 40.9  | 8,526  | 38.8  | 2,063                     | 56.9  |
| Unknown   | 6,118                              | 2.0        | 5,502                    | 2.0   | 534  | 2.4   | 82                        | 2.3   |
| Total AA  | 307,138                            | 100.0      | 281,539                  | 100.0 | 21,973   | 100.0 | 3,626                     | 100.0 |
| Percentage of Total Businesses:   |                                    |            | 91.7                     |       | 7.2  |       | 1.2                       |       |
| Total Farms by Tract  | Farms by Tract & Revenue Size      |            |                          |       |  |       |                           |       |
|   | Less Than or = \$1 Million         |            |                          |       | Over \$1 Million                                   |       | Revenue Not Reported      |       |
|   | #                                  | %          | #                        | %     | #  | %     | #                         | %     |
| Low   | 84                                 | 4.4        | 81                       | 4.3   | 3  | 8.6   | 0                         | 0.0   |
| Moderate  | 253                                | 13.2       | 241                      | 12.8  | 12   | 34.3  | 0                         | 0.0   |
| Middle  | 535                                | 27.9       | 526                      | 28.0  | 6  | 17.1  | 3                         | 75.0  |
| Upper   | 1,010                              | 52.7       | 996                      | 53.1  | 13   | 37.1  | 1                         | 25.0  |
| Unknown   | 33                                 | 1.7        | 32                       | 1.7   | 1  | 2.9   | 0                         | 0.0   |
| Total AA  | 1,915                              | 100.0      | 1,876                    | 100.0 | 35   | 100.0 | 4                         | 100.0 |
| Percentage of Total Farms:  |                                    |            | 98.0                     |       | 1.8  |       | 0.2                       |       |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                                    |            |                          |       |  |       |                           |       |
| Note: Percentages may not total 100.0 percent due to rounding.  |                                    |            |                          |       |  |       |                           |       |

## Beaumont-Port Arthur, TX MSA AA

Table B-2

| 2022 AA Combined Demographics<br>Assessment Area: Beaumont-Port Arthur MSA  |                           |                                    |                          |                  |  |                      |                           |              |
|---|---------------------------|------------------------------------|--------------------------|------------------|--|----------------------|---------------------------|--------------|
| Income Categories   | Tract Distribution        |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |              |
|   | #                         | %                                  | #                        | %                | #  | %                    | #                         | %            |
| Low   | 9                         | 7.9                                | 5,871                    | 6.0              | 2,259  | 38.5                 | 22,480                    | 22.8         |
| Moderate  | 29                        | 25.4                               | 20,523                   | 20.8             | 4,335  | 21.1                 | 17,211                    | 17.4         |
| Middle  | 32                        | 28.1                               | 30,236                   | 30.7             | 3,146  | 10.4                 | 17,581                    | 17.8         |
| Upper   | 38                        | 33.3                               | 40,328                   | 40.9             | 1,916  | 4.8                  | 41,361                    | 41.9         |
| Unknown   | 6                         | 5.3                                | 1,675                    | 1.7              | 260  | 15.5                 | 0                         | 0.0          |
| <b>Total AA</b>   | <b>114</b>                | <b>100.0</b>                       | <b>98,633</b>            | <b>100.0</b>     | <b>11,916</b>                                      | <b>12.1</b>          | <b>98,633</b>             | <b>100.0</b> |
|   | Housing Units by Tract    | Housing Type by Tract              |                          |                  |  |                      |                           |              |
|   |                           | Owner-occupied                     |                          |                  | Rental   |                      | Vacant                    |              |
| Low   | 11,248                    | 4,701                              | 4.8                      | 41.8             | 4,485  | 39.9                 | 2,062                     | 18.3         |
| Moderate  | 40,540                    | 17,734                             | 18.0                     | 43.7             | 16,586   | 40.9                 | 6,220                     | 15.3         |
| Middle  | 51,939                    | 30,403                             | 30.9                     | 58.5             | 14,184   | 27.3                 | 7,352                     | 14.2         |
| Upper   | 65,284                    | 43,798                             | 44.5                     | 67.1             | 12,334   | 18.9                 | 9,152                     | 14.0         |
| Unknown   | 2,930                     | 1,869                              | 1.9                      | 63.8             | 676  | 23.1                 | 385                       | 13.1         |
| <b>Total AA</b>   | <b>171,941</b>            | <b>98,505</b>                      | <b>100.0</b>             | <b>57.3</b>      | <b>48,265</b>                                      | <b>28.1</b>          | <b>25,171</b>             | <b>14.6</b>  |
|   | Total Businesses by Tract | Businesses by Tract & Revenue Size |                          |                  |  |                      |                           |              |
|   |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
| Low   | 622                       | 3.8                                | 567                      | 3.7              | 46   | 4.2                  | 9                         | 4.8          |
| Moderate  | 4,173                     | 25.4                               | 3,793                    | 25.0             | 352  | 32.5                 | 28                        | 14.8         |
| Middle  | 4,351                     | 26.5                               | 4,061                    | 26.8             | 243  | 22.4                 | 47                        | 24.9         |
| Upper   | 6,597                     | 40.2                               | 6,162                    | 40.7             | 339  | 31.3                 | 96                        | 50.8         |
| Unknown   | 684                       | 4.2                                | 572                      | 3.8              | 103  | 9.5                  | 9                         | 4.8          |
| <b>Total AA</b>   | <b>16,427</b>             | <b>100.0</b>                       | <b>15,155</b>            | <b>100.0</b>     | <b>1,083</b>                                       | <b>100.0</b>         | <b>189</b>                | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>  |                           |                                    | <b>92.3</b>              |                  | <b>6.6</b>   |                      | <b>1.2</b>                |              |
|   | Total Farms by Tract      | Farms by Tract & Revenue Size      |                          |                  |  |                      |                           |              |
|   |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
| Low   | 9                         | 4.2                                | 8                        | 3.8              | 1  | 33.3                 | 0                         | 0.0          |
| Moderate  | 14                        | 6.5                                | 14                       | 6.6              | 0  | 0.0                  | 0                         | 0.0          |
| Middle  | 51                        | 23.7                               | 49                       | 23.2             | 1  | 33.3                 | 1                         | 100.0        |
| Upper   | 132                       | 61.4                               | 131                      | 62.1             | 1  | 33.3                 | 0                         | 0.0          |
| Unknown   | 9                         | 4.2                                | 9                        | 4.3              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total AA</b>   | <b>215</b>                | <b>100.0</b>                       | <b>211</b>               | <b>100.0</b>     | <b>3</b>   | <b>100.0</b>         | <b>1</b>                  | <b>100.0</b> |
| <b>Percentage of Total Farms:</b>   |                           |                                    | <b>98.1</b>              |                  | <b>1.4</b>   |                      | <b>0.5</b>                |              |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                                    |                          |                  |  |                      |                           |              |

## Austin Metropolitan AA

Table B-3

| 2022 AA Combined Demographics<br>Assessment Area: Austin Metropolitan   |                                    |                |                          |                  |  |                      |                           |              |  |  |
|---|------------------------------------|----------------|--------------------------|------------------|--|----------------------|---------------------------|--------------|--|--|
| Income Categories   | Tract Distribution                 |                | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |              |  |  |
|   | #                                  | %              | #                        | %                | #  | %                    | #                         | %            |  |  |
| Low   | 3                                  | 2.2            | 2,193                    | 1.6              | 123  | 5.6                  | 23,721                    | 17.4         |  |  |
| Moderate  | 29                                 | 21.5           | 23,035                   | 16.9             | 1,601  | 7.0                  | 23,873                    | 17.5         |  |  |
| Middle  | 63                                 | 46.7           | 65,859                   | 48.4             | 2,945  | 4.5                  | 31,035                    | 22.8         |  |  |
| Upper   | 40                                 | 29.6           | 45,005                   | 33.1             | 899  | 2.0                  | 57,463                    | 42.2         |  |  |
| Unknown   | 0                                  | 0.0            | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |  |  |
| <b>Total AA</b>   | <b>135</b>                         | <b>100.0</b>   | <b>136,092</b>           | <b>100.0</b>     | <b>5,568</b>                                       | <b>4.1</b>           | <b>136,092</b>            | <b>100.0</b> |  |  |
| Housing Units by Tract  | Housing Type by Tract              |                |                          |                  |  |                      |                           |              |  |  |
|   | Owner-occupied                     |                |                          | Rental           |  | Vacant               |                           |              |  |  |
| Low   | 4,244                              | 942            | 0.7                      | 22.2             | 2,770  | 65.3                 | 532                       | 12.5         |  |  |
| Moderate  | 39,994                             | 17,174         | 13.4                     | 42.9             | 19,279   | 48.2                 | 3,541                     | 8.9          |  |  |
| Middle  | 98,606                             | 64,324         | 50.2                     | 65.2             | 29,259   | 29.7                 | 5,023                     | 5.1          |  |  |
| Upper   | 56,217                             | 45,800         | 35.7                     | 81.5             | 8,565  | 15.2                 | 1,852                     | 3.3          |  |  |
| Unknown   | 0                                  | 0              | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |  |  |
| <b>Total AA</b>   | <b>199,061</b>                     | <b>128,240</b> | <b>100.0</b>             | <b>64.4</b>      | <b>59,873</b>                                      | <b>30.1</b>          | <b>10,948</b>             | <b>5.5</b>   |  |  |
| Total Businesses by Tract   | Businesses by Tract & Revenue Size |                |                          |                  |  |                      |                           |              |  |  |
|   | Less Than or = \$1 Million         |                |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |  |  |
|   | #                                  | %              | #                        | %                | #  | %                    | #                         | %            |  |  |
| Low   | 1,044                              | 3.7            | 929                      | 3.4              | 97   | 7.6                  | 18                        | 5.0          |  |  |
| Moderate  | 5,304                              | 18.6           | 4,920                    | 18.3             | 322  | 25.4                 | 62                        | 17.1         |  |  |
| Middle  | 13,223                             | 46.3           | 12,535                   | 46.5             | 556  | 43.8                 | 132                       | 36.5         |  |  |
| Upper   | 9,011                              | 31.5           | 8,566                    | 31.8             | 295  | 23.2                 | 150                       | 41.4         |  |  |
| Unknown   | 0                                  | 0.0            | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |  |  |
| <b>Total AA</b>   | <b>28,582</b>                      | <b>100.0</b>   | <b>26,950</b>            | <b>100.0</b>     | <b>1,270</b>                                       | <b>100.0</b>         | <b>362</b>                | <b>100.0</b> |  |  |
| <b>Percentage of Total Businesses:</b>  |                                    |                | 94.3                     |                  | 4.4  |                      | 1.3                       |              |  |  |
| Total Farms by Tract  | Farms by Tract & Revenue Size      |                |                          |                  |  |                      |                           |              |  |  |
|   | Less Than or = \$1 Million         |                |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |  |  |
|   | #                                  | %              | #                        | %                | #  | %                    | #                         | %            |  |  |
| Low   | 5                                  | 1.3            | 4                        | 1.0              | 1  | 20.0                 | 0                         | 0.0          |  |  |
| Moderate  | 99                                 | 25.3           | 95                       | 24.5             | 4  | 80.0                 | 0                         | 0.0          |  |  |
| Middle  | 192                                | 49.0           | 192                      | 49.6             | 0  | 0.0                  | 0                         | 0.0          |  |  |
| Upper   | 96                                 | 24.5           | 96                       | 24.8             | 0  | 0.0                  | 0                         | 0.0          |  |  |
| Unknown   | 0                                  | 0.0            | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |  |  |
| <b>Total AA</b>   | <b>392</b>                         | <b>100.0</b>   | <b>387</b>               | <b>100.0</b>     | <b>5</b>   | <b>100.0</b>         | <b>0</b>                  | <b>0.0</b>   |  |  |
| <b>Percentage of Total Farms:</b>   |                                    |                | 98.7                     |                  | 1.3  |                      | 0.0                       |              |  |  |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                    |                |                          |                  |  |                      |                           |              |  |  |

## APPENDIX C – LENDING TABLES OF FULL-SCOPE ASSESSMENT AREAS

## Houston Metropolitan AA

Table C1-1

| Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography<br>Assessment Area: Houston Metropolitan                                   |                                  |       |         |        |       |       |      |       |       |         |       |       |                              |  |
|---|----------------------------------|-------|---------|--------|-------|-------|------|-------|-------|---------|-------|-------|------------------------------|--|
| Geographic<br>Income Level  | Bank And Aggregate Loans By Year |       |         |        |       |       |      |       |       |         |       |       | Owner<br>Occupied<br>Units % |  |
|   | 2022                             |       |         |        |       |       | 2023 |       |       |         |       |       |                              |  |
|   | Bank                             | Agg   | Bank    | Agg    | #     | #%    | Bank | Agg   | #     | #%      | Bank  | Agg   |                              |  |
| #   | #%                               | #%    | \$(000) | \$%    | \$%   |       | #    | #%    | #%    | \$(000) | \$%   | \$%   |                              |  |
| Home Purchase Loans   |                                  |       |         |        |       |       |      |       |       |         |       |       |                              |  |
| Low   | 5                                | 7.2   | 4.4     | 1,561  | 3.6   | 3.1   | 1    | 2.3   | 4.3   | 200     | 0.9   | 3.2   | 6.2                          |  |
| Moderate  | 4                                | 5.8   | 17.0    | 1,240  | 2.9   | 12.4  | 6    | 14.0  | 17.2  | 1,606   | 7.1   | 13.1  | 20.9                         |  |
| Middle  | 9                                | 13.0  | 32.0    | 4,081  | 9.5   | 27.4  | 8    | 18.6  | 34.3  | 4,514   | 19.9  | 29.7  | 31.4                         |  |
| Upper   | 51                               | 73.9  | 45.4    | 36,192 | 84.0  | 56.0  | 28   | 65.1  | 43.1  | 16,345  | 72.1  | 53.1  | 40.5                         |  |
| Unknown   | 0                                | 0.0   | 1.2     | 0      | 0.0   | 1.1   | 0    | 0.0   | 1.1   | 0       | 0.0   | 1.0   | 1.1                          |  |
| Total   | 69                               | 100.0 | 100.0   | 43,074 | 100.0 | 100.0 | 43   | 100.0 | 100.0 | 22,665  | 100.0 | 100.0 | 100.0                        |  |
| Refinance Loans   |                                  |       |         |        |       |       |      |       |       |         |       |       |                              |  |
| Low   | 2                                | 5.7   | 3.9     | 517    | 2.5   | 2.6   | 0    | 0.0   | 5.6   | 0       | 0.0   | 4.2   | 6.2                          |  |
| Moderate  | 10                               | 28.6  | 16.2    | 1,451  | 7.1   | 10.6  | 1    | 16.7  | 19.9  | 120     | 3.6   | 14.3  | 20.9                         |  |
| Middle  | 10                               | 28.6  | 32.9    | 2,257  | 11.0  | 26.2  | 2    | 33.3  | 33.6  | 660     | 20.1  | 28.1  | 31.4                         |  |
| Upper   | 12                               | 34.3  | 46.0    | 16,133 | 78.6  | 59.7  | 3    | 50.0  | 40.1  | 2,502   | 76.3  | 52.7  | 40.5                         |  |
| Unknown   | 1                                | 2.9   | 1.0     | 160    | 0.8   | 0.9   | 0    | 0.0   | 0.9   | 0       | 0.0   | 0.7   | 1.1                          |  |
| Total   | 35                               | 100.0 | 100.0   | 20,518 | 100.0 | 100.0 | 6    | 100.0 | 100.0 | 3,282   | 100.0 | 100.0 | 100.0                        |  |
| Home Improvement Loans  |                                  |       |         |        |       |       |      |       |       |         |       |       |                              |  |
| Low   | 0                                | 0.0   | 3.8     | 0      | 0.0   | 2.8   | 0    | 0.0   | 3.0   | 0       | 0.0   | 2.9   | 6.2                          |  |
| Moderate  | 0                                | 0.0   | 12.4    | 0      | 0.0   | 9.0   | 0    | 0.0   | 12.6  | 0       | 0.0   | 10.5  | 20.9                         |  |
| Middle  | 0                                | 0.0   | 24.8    | 0      | 0.0   | 19.6  | 0    | 0.0   | 28.2  | 0       | 0.0   | 23.8  | 31.4                         |  |
| Upper   | 1                                | 100.0 | 58.1    | 250    | 100.0 | 67.6  | 0    | 0.0   | 55.3  | 0       | 0.0   | 62.1  | 40.5                         |  |
| Unknown   | 0                                | 0.0   | 0.9     | 0      | 0.0   | 0.9   | 0    | 0.0   | 0.8   | 0       | 0.0   | 0.7   | 1.1                          |  |
| Total   | 1                                | 100.0 | 100.0   | 250    | 100.0 | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0 | 100.0                        |  |
| Multifamily Loans   |                                  |       |         |        |       |       |      |       |       |         |       |       |                              |  |
| Low   | 1                                | 25.0  | 21.8    | 488    | 10.3  | 13.8  | 0    | 0.0   | 19.9  | 0       | 0.0   | 14.8  | 24.6                         |  |
| Moderate  | 1                                | 25.0  | 27.5    | 592    | 12.5  | 19.4  | 2    | 33.3  | 28.8  | 838     | 16.4  | 25.0  | 26.4                         |  |
| Middle  | 0                                | 0.0   | 20.7    | 0      | 0.0   | 27.8  | 3    | 50.0  | 18.1  | 3,158   | 62.0  | 18.7  | 20.5                         |  |
| Upper   | 1                                | 25.0  | 26.6    | 2,362  | 49.8  | 33.4  | 1    | 16.7  | 30.5  | 1,100   | 21.6  | 37.5  | 24.0                         |  |
| Unknown   | 1                                | 25.0  | 3.3     | 1,302  | 27.4  | 5.6   | 0    | 0.0   | 2.7   | 0       | 0.0   | 4.0   | 4.4                          |  |
| Total   | 4                                | 100.0 | 100.0   | 4,744  | 100.0 | 100.0 | 6    | 100.0 | 100.0 | 5,095   | 100.0 | 100.0 | 100.0                        |  |
| Total Home Mortgage Loans   |                                  |       |         |        |       |       |      |       |       |         |       |       |                              |  |
| Low   | 8                                | 7.3   | 4.3     | 2,566  | 3.7   | 4.7   | 1    | 1.8   | 4.4   | 200     | 0.6   | 4.1   | 6.2                          |  |
| Moderate  | 15                               | 13.6  | 16.7    | 3,283  | 4.7   | 13.1  | 9    | 15.8  | 17.3  | 2,563   | 8.1   | 14.0  | 20.9                         |  |
| Middle  | 19                               | 17.3  | 32.0    | 6,338  | 9.2   | 27.1  | 13   | 22.8  | 33.9  | 8,332   | 26.4  | 28.6  | 31.4                         |  |
| Upper   | 66                               | 60.0  | 45.9    | 55,524 | 80.3  | 53.3  | 34   | 59.6  | 43.4  | 20,417  | 64.8  | 52.1  | 40.5                         |  |
| Unknown   | 2                                | 1.8   | 1.1     | 1,462  | 2.1   | 1.7   | 0    | 0.0   | 1.1   | 0       | 0.0   | 1.2   | 1.1                          |  |
| Total   | 110                              | 100.0 | 100.0   | 69,173 | 100.0 | 100.0 | 57   | 100.0 | 100.0 | 31,511  | 100.0 | 100.0 | 100.0                        |  |
| Source: 2023 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |         |        |       |       |      |       |       |         |       |       |                              |  |

Table C1-2

| Geographic Income Level | Bank And Aggregate Loans By Year |              |              |               |              |              |            |              |              |               |              |              | Total Businesses % |  |
|-------------------------|----------------------------------|--------------|--------------|---------------|--------------|--------------|------------|--------------|--------------|---------------|--------------|--------------|--------------------|--|
|                         | 2022                             |              |              |               |              |              | 2023       |              |              |               |              |              |                    |  |
|                         | Bank                             |              | Agg          | Bank          |              | Agg          | Bank       |              | Agg          | Bank          |              | Agg          |                    |  |
|                         | #                                | #%           | #%           | \$(000)       | \$%          | \$%          | #          | #%           | #%           | \$(000)       | \$%          | \$%          |                    |  |
| Low                     | 23                               | 9.3          | 9.6          | 7,225         | 9.4          | 11.0         | 23         | 11.7         | 9.1          | 9,191         | 15.2         | 10.3         | 10.3               |  |
| Moderate                | 38                               | 15.4         | 20.3         | 12,899        | 16.7         | 22.5         | 46         | 23.5         | 19.8         | 16,278        | 26.9         | 22.2         | 21.1               |  |
| Middle                  | 79                               | 32.1         | 25.9         | 26,597        | 34.5         | 23.9         | 43         | 21.9         | 25.9         | 14,210        | 23.5         | 23.8         | 26.0               |  |
| Upper                   | 103                              | 41.9         | 41.9         | 28,812        | 37.3         | 40.8         | 83         | 42.3         | 43.0         | 19,735        | 32.7         | 41.7         | 40.7               |  |
| Unknown                 | 3                                | 1.2          | 1.8          | 1,660         | 2.2          | 1.7          | 1          | 0.5          | 1.8          | 1,000         | 1.7          | 1.9          | 1.9                |  |
| <b>Total</b>            | <b>246</b>                       | <b>100.0</b> | <b>100.0</b> | <b>77,193</b> | <b>100.0</b> | <b>100.0</b> | <b>196</b> | <b>100.0</b> | <b>100.0</b> | <b>60,414</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>       |  |

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 C1-3

| 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)       | \$%          | \$%          |                             |  |
| <b>Home Purchase Loans</b>       |                                  |              |              |               |              |              |           |              |              |               |              |              |                             |  |
| Low                              | 0                                | 0.0          | 3.0          | 0             | 0.0          | 1.4          | 0         | 0.0          | 2.1          | 0             | 0.0          | 0.9          | 25.3                        |  |
| Moderate                         | 1                                | 1.4          | 15.7         | 151           | 0.4          | 10.1         | 1         | 2.3          | 13.6         | 84            | 0.4          | 8.8          | 17.3                        |  |
| Middle                           | 2                                | 2.9          | 21.3         | 897           | 2.1          | 17.3         | 3         | 7.0          | 19.6         | 807           | 3.6          | 16.0         | 18.0                        |  |
| Upper                            | 34                               | 49.3         | 41.1         | 31,304        | 72.7         | 53.1         | 25        | 58.1         | 38.4         | 17,413        | 76.8         | 50.2         | 39.4                        |  |
| Unknown                          | 32                               | 46.4         | 19.0         | 10,722        | 24.9         | 18.3         | 14        | 32.6         | 26.2         | 4,361         | 19.2         | 24.1         | 0.0                         |  |
| <b>Total</b>                     | <b>69</b>                        | <b>100.0</b> | <b>100.0</b> | <b>43,074</b> | <b>100.0</b> | <b>100.0</b> | <b>43</b> | <b>100.0</b> | <b>100.0</b> | <b>22,665</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>                |  |
| <b>Refinance Loans</b>           |                                  |              |              |               |              |              |           |              |              |               |              |              |                             |  |
| Low                              | 0                                | 0.0          | 7.5          | 0             | 0.0          | 3.8          | 0         | 0.0          | 7.6          | 0             | 0.0          | 4.1          | 25.3                        |  |
| Moderate                         | 1                                | 2.9          | 17.5         | 172           | 0.8          | 11.3         | 0         | 0.0          | 16.1         | 0             | 0.0          | 10.3         | 17.3                        |  |
| Middle                           | 1                                | 2.9          | 21.3         | 255           | 1.2          | 16.4         | 0         | 0.0          | 19.7         | 0             | 0.0          | 15.0         | 18.0                        |  |
| Upper                            | 11                               | 31.4         | 40.4         | 11,662        | 56.8         | 54.1         | 4         | 66.7         | 40.7         | 2,777         | 84.6         | 53.0         | 39.4                        |  |
| Unknown                          | 22                               | 62.9         | 13.3         | 8,429         | 41.1         | 14.5         | 2         | 33.3         | 15.8         | 505           | 15.4         | 17.5         | 0.0                         |  |
| <b>Total</b>                     | <b>35</b>                        | <b>100.0</b> | <b>100.0</b> | <b>20,518</b> | <b>100.0</b> | <b>100.0</b> | <b>6</b>  | <b>100.0</b> | <b>100.0</b> | <b>3,282</b>  | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>                |  |
| <b>Home Improvement Loans</b>    |                                  |              |              |               |              |              |           |              |              |               |              |              |                             |  |
| Low                              | 0                                | 0.0          | 5.9          | 0             | 0.0          | 3.3          | 0         | 0.0          | 5.1          | 0             | 0.0          | 3.1          | 25.3                        |  |
| Moderate                         | 0                                | 0.0          | 11.9         | 0             | 0.0          | 8.0          | 0         | 0.0          | 12.2         | 0             | 0.0          | 7.8          | 17.3                        |  |
| Middle                           | 0                                | 0.0          | 16.7         | 0             | 0.0          | 11.4         | 0         | 0.0          | 18.0         | 0             | 0.0          | 13.0         | 18.0                        |  |
| Upper                            | 0                                | 0.0          | 63.2         | 0             | 0.0          | 74.0         | 0         | 0.0          | 62.4         | 0             | 0.0          | 71.3         | 39.4                        |  |
| Unknown                          | 1                                | 100.0        | 2.3          | 250           | 100.0        | 3.3          | 0         | 0.0          | 2.3          | 0             | 0.0          | 4.7          | 0.0                         |  |
| <b>Total</b>                     | <b>1</b>                         | <b>100.0</b> | <b>100.0</b> | <b>250</b>    | <b>100.0</b> | <b>100.0</b> | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>                |  |
| <b>Total Home Mortgage Loans</b> |                                  |              |              |               |              |              |           |              |              |               |              |              |                             |  |
| Low                              | 0                                | 0.0          | 4.2          | 0             | 0.0          | 1.9          | 0         | 0.0          | 3.0          | 0             | 0.0          | 1.3          | 25.3                        |  |
| Moderate                         | 2                                | 1.9          | 15.8         | 323           | 0.5          | 10.2         | 1         | 2.0          | 13.7         | 84            | 0.3          | 8.9          | 17.3                        |  |
| Middle                           | 3                                | 2.8          | 20.8         | 1,152         | 1.8          | 16.8         | 3         | 5.9          | 19.4         | 807           | 3.1          | 15.8         | 18.0                        |  |
| Upper                            | 46                               | 43.4         | 41.3         | 43,553        | 67.6         | 53.5         | 31        | 60.8         | 39.8         | 20,660        | 78.2         | 50.8         | 39.4                        |  |
| Unknown                          | 55                               | 51.9         | 17.9         | 19,401        | 30.1         | 17.6         | 16        | 31.4         | 24.0         | 4,865         | 18.4         | 23.2         | 0.0                         |  |
| <b>Total</b>                     | <b>106</b>                       | <b>100.0</b> | <b>100.0</b> | <b>64,429</b> | <b>100.0</b> | <b>100.0</b> | <b>51</b> | <b>100.0</b> | <b>100.0</b> | <b>26,416</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>                |  |

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 C1-4

| Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses<br>Assessment Area: Houston Metropolitan |                                  |        |         |              |        |        |         |              |        |         |                    |       |
|---|----------------------------------|--------|---------|--------------|--------|--------|---------|--------------|--------|---------|--------------------|-------|
|   | Bank And Aggregate Loans By Year |        |         |              |        |        |         |              |        |         | Total Businesses % |       |
|   | 2022                             |        |         |              | 2023   |        |         |              |        |         |                    |       |
|   | Bank #                           | Agg #% | Bank #% | Agg \$%(000) | Bank # | Agg #% | Bank #% | Agg \$%(000) | Bank # | Agg \$% |                    |       |
| <b>By Revenue</b>   |                                  |        |         |              |        |        |         |              |        |         |                    |       |
| <b>\$1 Million or Less</b>  | 107                              | 43.5   | 49.0    | 35,860       | 46.5   | 33.4   | 93      | 47.4         | 51.6   | 29,518  | 48.9               | 32.2  |
| <b>Over \$1 Million</b>   | 116                              | 47.2   |         | 37,367       | 48.4   |        | 90      | 45.9         |        | 29,005  | 48.0               |       |
| <b>Revenue Unknown</b>  | 23                               | 9.3    |         | 3,966        | 5.1    |        | 13      | 6.6          |        | 1,891   | 3.1                |       |
| <b>Total</b>  | 246                              | 100.0  |         | 77,193       | 100.0  |        | 196     | 100.0        |        | 60,414  | 100.0              |       |
| <b>By Loan Size</b>   |                                  |        |         |              |        |        |         |              |        |         |                    |       |
| <b>\$100,000 or Less</b>  | 77                               | 31.3   | 94.3    | 5,297        | 6.9    | 40.1   | 52      | 26.5         | 94.3   | 3,385   | 5.6                | 40.8  |
| <b>\$100,001 - \$250,000</b>  | 59                               | 24.0   | 3.0     | 10,718       | 13.9   | 15.1   | 59      | 30.1         | 3.0    | 10,254  | 17.0               | 15.6  |
| <b>\$250,001 - \$1 Million</b>  | 110                              | 44.7   | 2.7     | 61,178       | 79.3   | 44.8   | 85      | 43.4         | 2.6    | 46,775  | 77.4               | 43.6  |
| <b>Total</b>  | 246                              | 100.0  | 100.0   | 77,193       | 100.0  | 100.0  | 196     | 100.0        | 100.0  | 60,414  | 100.0              | 100.0 |
| <b>By Loan Size and Revenues \$1 Million or Less</b>  |                                  |        |         |              |        |        |         |              |        |         |                    |       |
| <b>\$100,000 or Less</b>  | 29                               | 27.1   |         | 1,959        | 5.5    |        | 30      | 32.3         |        | 1,703   | 5.8                |       |
| <b>\$100,001 - \$250,000</b>  | 26                               | 24.3   |         | 4,825        | 13.5   |        | 25      | 26.9         |        | 4,417   | 15.0               |       |
| <b>\$250,001 - \$1 Million</b>  | 52                               | 48.6   |         | 29,076       | 81.1   |        | 38      | 40.9         |        | 23,398  | 79.3               |       |
| <b>Total</b>  | 107                              | 100.0  |         | 35,860       | 100.0  |        | 93      | 100.0        |        | 29,518  | 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.

## Beaumont-Port Arthur, TX MSA AA

Table C2-1A

| Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography |                                  |       |          |       |       |       |      |       |          |       |       |       |                        |  |
|--|----------------------------------|-------|----------|-------|-------|-------|------|-------|----------|-------|-------|-------|------------------------|--|
| Assessment Area: Beaumont 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) | \$ %  | \$ %  |       |                        |  |
| <b>Home Purchase Loans</b>   |                                  |       |          |       |       |       |      |       |          |       |       |       |                        |  |
| <b>Low</b>   | 1                                | 12.5  | 2.3      | 52    | 3.3   | 1.8   | 0    | 0.0   | 2.2      | 0     | 0.0   | 1.6   | 4.8                    |  |
| <b>Moderate</b>  | 4                                | 50.0  | 10.3     | 488   | 30.7  | 7.8   | 0    | 0.0   | 10.8     | 0     | 0.0   | 8.1   | 18.0                   |  |
| <b>Middle</b>  | 0                                | 0.0   | 30.7     | 0     | 0.0   | 26.3  | 4    | 66.7  | 31.6     | 400   | 20.2  | 27.5  | 30.9                   |  |
| <b>Upper</b>   | 3                                | 37.5  | 55.2     | 1,052 | 66.1  | 62.5  | 2    | 33.3  | 54.0     | 1,584 | 79.9  | 61.1  | 44.5                   |  |
| <b>Unknown</b>   | 0                                | 0.0   | 1.4      | 0     | 0.0   | 1.7   | 0    | 0.0   | 1.4      | 0     | 0.0   | 1.6   | 1.9                    |  |
| <b>Total</b>   | 8                                | 100.0 | 100.0    | 1,592 | 100.0 | 100.0 | 6    | 100.0 | 100.0    | 1,984 | 100.0 | 100.0 | 100.0                  |  |
| <b>Refinance Loans</b>   |                                  |       |          |       |       |       |      |       |          |       |       |       |                        |  |
| <b>Low</b>   | 0                                | 0.0   | 1.8      | 0     | 0.0   | 1.6   | 0    | 0.0   | 3.7      | 0     | 0.0   | 2.5   | 4.8                    |  |
| <b>Moderate</b>  | 0                                | 0.0   | 12.5     | 0     | 0.0   | 8.0   | 2    | 33.3  | 15.0     | 321   | 39.2  | 10.9  | 18.0                   |  |
| <b>Middle</b>  | 1                                | 50.0  | 31.9     | 233   | 75.9  | 27.1  | 2    | 33.3  | 30.2     | 235   | 28.7  | 23.8  | 30.9                   |  |
| <b>Upper</b>   | 1                                | 50.0  | 52.4     | 74    | 24.1  | 61.9  | 2    | 33.3  | 50.5     | 262   | 32.1  | 62.0  | 44.5                   |  |
| <b>Unknown</b>   | 0                                | 0.0   | 1.4      | 0     | 0.0   | 1.4   | 0    | 0.0   | 0.6      | 0     | 0.0   | 0.7   | 1.9                    |  |
| <b>Total</b>   | 2                                | 100.0 | 100.0    | 307   | 100.0 | 100.0 | 6    | 100.0 | 100.0    | 818   | 100.0 | 100.0 | 100.0                  |  |
| <b>Home Improvement Loans</b>  |                                  |       |          |       |       |       |      |       |          |       |       |       |                        |  |
| <b>Low</b>   | 0                                | 0.0   | 2.7      | 0     | 0.0   | 1.9   | 0    | 0.0   | 1.4      | 0     | 0.0   | 1.3   | 4.8                    |  |
| <b>Moderate</b>  | 0                                | 0.0   | 13.3     | 0     | 0.0   | 9.7   | 0    | 0.0   | 8.2      | 0     | 0.0   | 6.5   | 18.0                   |  |
| <b>Middle</b>  | 0                                | 0.0   | 27.7     | 0     | 0.0   | 25.4  | 0    | 0.0   | 29.2     | 0     | 0.0   | 31.2  | 30.9                   |  |
| <b>Upper</b>   | 0                                | 0.0   | 54.7     | 0     | 0.0   | 61.8  | 0    | 0.0   | 58.7     | 0     | 0.0   | 56.7  | 44.5                   |  |
| <b>Unknown</b>   | 0                                | 0.0   | 1.6      | 0     | 0.0   | 1.2   | 0    | 0.0   | 2.5      | 0     | 0.0   | 4.2   | 1.9                    |  |
| <b>Total</b>   | 0                                | 0.0   | 100.0    | 0     | 0.0   | 100.0 | 0    | 0.0   | 100.0    | 0     | 0.0   | 100.0 | 100.0                  |  |
| <b>Multifamily Loans</b>   |                                  |       |          |       |       |       |      |       |          |       |       |       | Multi-family Units %   |  |
| <b>Low</b>   | 0                                | 0.0   | 6.2      | 0     | 0.0   | 2.0   | 0    | 0.0   | 3.7      | 0     | 0.0   | 3.2   | 12.9                   |  |
| <b>Moderate</b>  | 0                                | 0.0   | 27.7     | 0     | 0.0   | 43.0  | 0    | 0.0   | 51.9     | 0     | 0.0   | 36.0  | 34.2                   |  |
| <b>Middle</b>  | 0                                | 0.0   | 26.2     | 0     | 0.0   | 23.3  | 0    | 0.0   | 22.2     | 0     | 0.0   | 43.5  | 26.5                   |  |
| <b>Upper</b>   | 0                                | 0.0   | 33.8     | 0     | 0.0   | 30.5  | 0    | 0.0   | 18.5     | 0     | 0.0   | 17.0  | 24.8                   |  |
| <b>Unknown</b>   | 0                                | 0.0   | 6.2      | 0     | 0.0   | 1.2   | 0    | 0.0   | 3.7      | 0     | 0.0   | 0.2   | 1.5                    |  |
| <b>Total</b>   | 0                                | 0.0   | 100.0    | 0     | 0.0   | 100.0 | 0    | 0.0   | 100.0    | 0     | 0.0   | 100.0 | 100.0                  |  |
| <b>Total Home Mortgage Loans</b>   |                                  |       |          |       |       |       |      |       |          |       |       |       | Owner Occupied Units % |  |
| <b>Low</b>   | 1                                | 10.0  | 2.2      | 52    | 2.7   | 1.8   | 1    | 7.1   | 2.5      | 160   | 5.3   | 1.9   | 4.8                    |  |
| <b>Moderate</b>  | 4                                | 40.0  | 11.0     | 488   | 25.7  | 11.4  | 2    | 14.3  | 11.5     | 321   | 10.6  | 10.9  | 18.0                   |  |
| <b>Middle</b>  | 1                                | 10.0  | 30.8     | 233   | 12.3  | 26.1  | 6    | 42.9  | 31.3     | 635   | 20.9  | 28.7  | 30.9                   |  |
| <b>Upper</b>   | 4                                | 40.0  | 54.4     | 1,126 | 59.3  | 59.1  | 5    | 35.7  | 53.3     | 1,922 | 63.3  | 57.0  | 44.5                   |  |
| <b>Unknown</b>   | 0                                | 0.0   | 1.5      | 0     | 0.0   | 1.6   | 0    | 0.0   | 1.5      | 0     | 0.0   | 1.5   | 1.9                    |  |
| <b>Total</b>   | 10                               | 100.0 | 100.0    | 1,899 | 100.0 | 100.0 | 14   | 100.0 | 100.0    | 3,037 | 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 C2-1B

| Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography<br>Assessment Area: Beaumont MSA |                                  |     |         |     |     |       |      |       |       |         |       |                              |       |
|---|----------------------------------|-----|---------|-----|-----|-------|------|-------|-------|---------|-------|------------------------------|-------|
| Geographic<br>Income<br>Level   | Bank And Aggregate Loans By Year |     |         |     |     |       |      |       |       |         |       | Owner<br>Occupied<br>Units % |       |
|   | 2022                             |     |         |     |     |       | 2023 |       |       |         |       |                              |       |
|   | Bank                             | Agg | Bank    | Agg |     |       | Bank | Agg   | Bank  | Agg     |       |                              |       |
| #   | #%                               | #%  | \$(000) | \$% | \$% |       | #    | #%    | #%    | \$(000) | \$%   | \$%                          |       |
| <b>Other Purpose LOC</b>  |                                  |     |         |     |     |       |      |       |       |         |       |                              |       |
| <b>Low</b>  | 0                                | 0.0 | 0.0     | 0   | 0.0 | 0.0   | 0    | 0.0   | 6.9   | 0       | 0.0   | 4.5                          | 4.8   |
| <b>Moderate</b>   | 0                                | 0.0 | 12.5    | 0   | 0.0 | 7.7   | 0    | 0.0   | 20.7  | 0       | 0.0   | 17.8                         | 18.0  |
| <b>Middle</b>   | 0                                | 0.0 | 29.2    | 0   | 0.0 | 15.2  | 0    | 0.0   | 24.1  | 0       | 0.0   | 18.6                         | 30.9  |
| <b>Upper</b>  | 0                                | 0.0 | 54.2    | 0   | 0.0 | 74.5  | 0    | 0.0   | 48.3  | 0       | 0.0   | 59.1                         | 44.5  |
| <b>Unknown</b>  | 0                                | 0.0 | 4.2     | 0   | 0.0 | 2.6   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0                          | 1.9   |
| <b>Total</b>  | 0                                | 0.0 | 100.0   | 0   | 0.0 | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0                        | 100.0 |
| <b>Other Purpose Closed/Exempt</b>  |                                  |     |         |     |     |       |      |       |       |         |       |                              |       |
| <b>Low</b>  | 0                                | 0.0 | 1.1     | 0   | 0.0 | 0.6   | 1    | 50.0  | 4.0   | 160     | 68.1  | 4.3                          | 4.8   |
| <b>Moderate</b>   | 0                                | 0.0 | 8.0     | 0   | 0.0 | 6.8   | 0    | 0.0   | 11.0  | 0       | 0.0   | 8.8                          | 18.0  |
| <b>Middle</b>   | 0                                | 0.0 | 30.1    | 0   | 0.0 | 26.6  | 0    | 0.0   | 29.5  | 0       | 0.0   | 27.9                         | 30.9  |
| <b>Upper</b>  | 0                                | 0.0 | 58.9    | 0   | 0.0 | 63.7  | 1    | 50.0  | 52.2  | 75      | 31.9  | 55.3                         | 44.5  |
| <b>Unknown</b>  | 0                                | 0.0 | 1.8     | 0   | 0.0 | 2.3   | 0    | 0.0   | 3.3   | 0       | 0.0   | 3.7                          | 1.9   |
| <b>Total</b>  | 0                                | 0.0 | 100.0   | 0   | 0.0 | 100.0 | 2    | 100.0 | 100.0 | 235     | 100.0 | 100.0                        | 100.0 |
| <b>Purpose Not Applicable</b>   |                                  |     |         |     |     |       |      |       |       |         |       |                              |       |
| <b>Low</b>  | 0                                | 0.0 | 2.8     | 0   | 0.0 | 2.7   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0                          | 4.8   |
| <b>Moderate</b>   | 0                                | 0.0 | 18.7    | 0   | 0.0 | 14.3  | 0    | 0.0   | 11.3  | 0       | 0.0   | 6.9                          | 18.0  |
| <b>Middle</b>   | 0                                | 0.0 | 32.7    | 0   | 0.0 | 25.9  | 0    | 0.0   | 48.4  | 0       | 0.0   | 43.2                         | 30.9  |
| <b>Upper</b>  | 0                                | 0.0 | 43.9    | 0   | 0.0 | 54.3  | 0    | 0.0   | 37.1  | 0       | 0.0   | 45.9                         | 44.5  |
| <b>Unknown</b>  | 0                                | 0.0 | 1.9     | 0   | 0.0 | 2.8   | 0    | 0.0   | 3.2   | 0       | 0.0   | 4.0                          | 1.9   |
| <b>Total</b>  | 0                                | 0.0 | 100.0   | 0   | 0.0 | 100.0 | 0    | 0.0   | 100.0 | 0       | 0.0   | 100.0                        | 100.0 |
| Source: 2023 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey                         |                                  |     |         |     |     |       |      |       |       |         |       |                              |       |
| Note: Percentages may not total 100.0 percent due to rounding.  |                                  |     |         |     |     |       |      |       |       |         |       |                              |       |

Table C2-2

| Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography<br>Assessment Area: Beaumont MSA      |                                  |       |         |        |       |       |      |       |       |         |       |                          |       |
|---|----------------------------------|-------|---------|--------|-------|-------|------|-------|-------|---------|-------|--------------------------|-------|
| Geographic<br>Income<br>Level   | Bank And Aggregate Loans By Year |       |         |        |       |       |      |       |       |         |       | Total<br>Businesses<br>% |       |
|   | 2022                             |       |         |        |       |       | 2023 |       |       |         |       |                          |       |
|   | Bank                             | Agg   | Bank    | Agg    |       |       | Bank | Agg   | Bank  | Agg     |       |                          |       |
| #   | #%                               | #%    | \$(000) | \$%    | \$%   |       | #    | #%    | #%    | \$(000) | \$%   | \$%                      |       |
| <b>Low</b>  | 5                                | 2.5   | 3.8     | 1,535  | 3.0   | 2.8   | 4    | 2.7   | 4.0   | 1,115   | 2.8   | 3.3                      | 3.8   |
| <b>Moderate</b>   | 37                               | 18.7  | 22.2    | 10,420 | 20.5  | 24.0  | 35   | 23.3  | 21.8  | 11,582  | 28.7  | 24.4                     | 25.3  |
| <b>Middle</b>   | 39                               | 19.7  | 26.3    | 9,385  | 18.5  | 21.9  | 29   | 19.3  | 25.1  | 7,205   | 17.9  | 20.0                     | 26.7  |
| <b>Upper</b>  | 104                              | 52.5  | 42.3    | 25,237 | 49.7  | 42.6  | 70   | 46.7  | 43.0  | 16,247  | 40.3  | 44.4                     | 39.8  |
| <b>Unknown</b>  | 13                               | 6.6   | 4.4     | 4,151  | 8.2   | 8.5   | 12   | 8.0   | 5.2   | 4,198   | 10.4  | 7.8                      | 4.3   |
| <b>Total</b>  | 198                              | 100.0 | 100.0   | 50,728 | 100.0 | 100.0 | 150  | 100.0 | 100.0 | 40,347  | 100.0 | 100.0                    | 100.0 |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                                  |       |         |        |       |       |      |       |       |         |       |                          |       |
| Note: Percentages may not total 100.0 percent due to rounding.  |                                  |       |         |        |       |       |      |       |       |         |       |                          |       |

Table C2-3

| Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography<br>Assessment Area: Beaumont MSA |                                  |              |              |              |              |              |          |              |              |            |              |              |                  |  |
|--|----------------------------------|--------------|--------------|--------------|--------------|--------------|----------|--------------|--------------|------------|--------------|--------------|------------------|--|
| Geographic<br>Income<br>Level  | Bank And Aggregate Loans By Year |              |              |              |              |              |          |              |              |            |              |              | Total<br>Farms % |  |
|  | 2022                             |              |              |              |              |              | 2023     |              |              |            |              |              |                  |  |
|  | Bank                             | Agg          | Bank         | Agg          |              |              | Bank     | Agg          | Bank         | Agg        |              |              |                  |  |
| #  | #%                               | #%           | \$(000)      | \$%          | \$%          |              | #        | #%           | \$(000)      | \$%        |              |              | \$%              |  |
| Low  | 0                                | 0.0          | 7.6          | 0            | 0.0          | 4.0          | 0        | 0.0          | 7.9          | 0          | 0.0          | 1.5          | 4.7              |  |
| Moderate   | 0                                | 0.0          | 1.3          | 0            | 0.0          | 0.9          | 0        | 0.0          | 10.5         | 0          | 0.0          | 2.6          | 7.5              |  |
| Middle   | 2                                | 33.3         | 15.2         | 700          | 46.3         | 10.1         | 2        | 66.7         | 13.2         | 700        | 84.8         | 12.3         | 24.4             |  |
| Upper  | 4                                | 66.7         | 73.4         | 811          | 53.7         | 84.8         | 1        | 33.3         | 68.4         | 125        | 15.2         | 83.5         | 59.2             |  |
| Unknown  | 0                                | 0.0          | 2.5          | 0            | 0.0          | 0.3          | 0        | 0.0          | 0.0          | 0          | 0.0          | 0.0          | 4.2              |  |
| <b>Total</b>   | <b>6</b>                         | <b>100.0</b> | <b>100.0</b> | <b>1,511</b> | <b>100.0</b> | <b>100.0</b> | <b>3</b> | <b>100.0</b> | <b>100.0</b> | <b>825</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>     |  |

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 C2-4A

| Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level<br>Assessment Area: Beaumont MSA |                                  |              |              |              |              |              |           |              |              |              |              |              |                                   |  |
|---|----------------------------------|--------------|--------------|--------------|--------------|--------------|-----------|--------------|--------------|--------------|--------------|--------------|-----------------------------------|--|
| Borrower<br>Income<br>Level   | Bank And Aggregate Loans By Year |              |              |              |              |              |           |              |              |              |              |              | Families by<br>Family<br>Income % |  |
|   | 2022                             |              |              |              |              |              | 2023      |              |              |              |              |              |                                   |  |
|   | Bank                             | Agg          | Bank         | Agg          |              |              | Bank      | Agg          | Bank         | Agg          |              |              |                                   |  |
| #   | #%                               | #%           | \$(000)      | \$%          | \$%          |              | #         | #%           | \$(000)      | \$%          |              |              | \$%                               |  |
| <b>Home Purchase Loans</b>  |                                  |              |              |              |              |              |           |              |              |              |              |              |                                   |  |
| Low   | 0                                | 0.0          | 4.3          | 0            | 0.0          | 2.2          | 0         | 0.0          | 4.3          | 0            | 0.0          | 2.2          | 22.8                              |  |
| Moderate  | 0                                | 0.0          | 17.1         | 0            | 0.0          | 12.1         | 0         | 0.0          | 16.1         | 0            | 0.0          | 11.8         | 17.4                              |  |
| Middle  | 0                                | 0.0          | 22.9         | 0            | 0.0          | 21.0         | 0         | 0.0          | 21.5         | 0            | 0.0          | 20.6         | 17.8                              |  |
| Upper   | 1                                | 12.5         | 34.1         | 692          | 43.5         | 44.0         | 1         | 16.7         | 29.6         | 1,040        | 52.4         | 38.7         | 41.9                              |  |
| Unknown   | 7                                | 87.5         | 21.6         | 900          | 56.5         | 20.7         | 5         | 83.3         | 28.6         | 944          | 47.6         | 26.7         | 0.0                               |  |
| <b>Total</b>  | <b>8</b>                         | <b>100.0</b> | <b>100.0</b> | <b>1,592</b> | <b>100.0</b> | <b>100.0</b> | <b>6</b>  | <b>100.0</b> | <b>100.0</b> | <b>1,984</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>                      |  |
| <b>Refinance Loans</b>  |                                  |              |              |              |              |              |           |              |              |              |              |              |                                   |  |
| Low   | 0                                | 0.0          | 5.2          | 0            | 0.0          | 2.7          | 0         | 0.0          | 6.0          | 0            | 0.0          | 2.6          | 22.8                              |  |
| Moderate  | 0                                | 0.0          | 13.7         | 0            | 0.0          | 8.9          | 0         | 0.0          | 13.1         | 0            | 0.0          | 7.8          | 17.4                              |  |
| Middle  | 0                                | 0.0          | 19.9         | 0            | 0.0          | 17.1         | 0         | 0.0          | 16.1         | 0            | 0.0          | 13.0         | 17.8                              |  |
| Upper   | 0                                | 0.0          | 41.4         | 0            | 0.0          | 49.6         | 1         | 16.7         | 40.8         | 121          | 14.8         | 50.2         | 41.9                              |  |
| Unknown   | 2                                | 100.0        | 19.8         | 307          | 100.0        | 21.8         | 5         | 83.3         | 24.0         | 697          | 85.3         | 26.4         | 0.0                               |  |
| <b>Total</b>  | <b>2</b>                         | <b>100.0</b> | <b>100.0</b> | <b>307</b>   | <b>100.0</b> | <b>100.0</b> | <b>6</b>  | <b>100.0</b> | <b>100.0</b> | <b>818</b>   | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>                      |  |
| <b>Home Improvement Loans</b>   |                                  |              |              |              |              |              |           |              |              |              |              |              |                                   |  |
| Low   | 0                                | 0.0          | 10.5         | 0            | 0.0          | 6.5          | 0         | 0.0          | 6.8          | 0            | 0.0          | 4.4          | 22.8                              |  |
| Moderate  | 0                                | 0.0          | 14.8         | 0            | 0.0          | 11.9         | 0         | 0.0          | 16.7         | 0            | 0.0          | 12.5         | 17.4                              |  |
| Middle  | 0                                | 0.0          | 18.4         | 0            | 0.0          | 19.1         | 0         | 0.0          | 21.0         | 0            | 0.0          | 16.0         | 17.8                              |  |
| Upper   | 0                                | 0.0          | 51.6         | 0            | 0.0          | 57.2         | 0         | 0.0          | 53.0         | 0            | 0.0          | 64.2         | 41.9                              |  |
| Unknown   | 0                                | 0.0          | 4.7          | 0            | 0.0          | 5.3          | 0         | 0.0          | 2.5          | 0            | 0.0          | 2.9          | 0.0                               |  |
| <b>Total</b>  | <b>0</b>                         | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b> | <b>0</b>  | <b>0.0</b>   | <b>100.0</b> | <b>0</b>     | <b>0.0</b>   | <b>100.0</b> | <b>100.0</b>                      |  |
| <b>Total Home Mortgage Loans</b>  |                                  |              |              |              |              |              |           |              |              |              |              |              |                                   |  |
| Low   | 0                                | 0.0          | 4.8          | 0            | 0.0          | 2.4          | 0         | 0.0          | 5.0          | 0            | 0.0          | 2.5          | 22.8                              |  |
| Moderate  | 0                                | 0.0          | 16.2         | 0            | 0.0          | 11.5         | 1         | 7.1          | 16.0         | 75           | 2.5          | 11.5         | 17.4                              |  |
| Middle  | 0                                | 0.0          | 22.1         | 0            | 0.0          | 20.2         | 1         | 7.1          | 20.9         | 160          | 5.3          | 19.7         | 17.8                              |  |
| Upper   | 1                                | 10.0         | 36.4         | 692          | 36.4         | 45.2         | 2         | 14.3         | 32.5         | 1,161        | 38.2         | 40.8         | 41.9                              |  |
| Unknown   | 9                                | 90.0         | 20.5         | 1,207        | 63.6         | 20.7         | 10        | 71.4         | 25.6         | 1,641        | 54.0         | 25.7         | 0.0                               |  |
| <b>Total</b>  | <b>10</b>                        | <b>100.0</b> | <b>100.0</b> | <b>1,899</b> | <b>100.0</b> | <b>100.0</b> | <b>14</b> | <b>100.0</b> | <b>100.0</b> | <b>3,037</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>                      |  |

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 C2-4B

| Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level |                                  |     |         |     |      |       |      |       |         |     |       |                             |       |
|--|----------------------------------|-----|---------|-----|------|-------|------|-------|---------|-----|-------|-----------------------------|-------|
| Assessment Area: Beaumont MSA  |                                  |     |         |     |      |       |      |       |         |     |       |                             |       |
| Borrower Income Level  | Bank And Aggregate Loans By Year |     |         |     |      |       |      |       |         |     |       | Families by Family Income % |       |
|  | 2022                             |     |         |     | 2023 |       |      |       |         |     |       |                             |       |
|  | Bank                             | Agg | Bank    | Agg | Bank | Agg   | Bank | Agg   | Bank    | Agg | Bank  |                             |       |
| #  | #%                               | #%  | \$(000) | \$% | \$%  | #     | #%   | #%    | \$(000) | \$% | \$%   | \$%                         |       |
| Other Purpose LOC  |                                  |     |         |     |      |       |      |       |         |     |       |                             |       |
| <b>Low</b>   | 0                                | 0.0 | 16.7    | 0   | 0.0  | 9.4   | 0    | 0.0   | 20.7    | 0   | 0.0   | 15.1                        | 22.8  |
| <b>Moderate</b>  | 0                                | 0.0 | 20.8    | 0   | 0.0  | 14.1  | 0    | 0.0   | 10.3    | 0   | 0.0   | 13.0                        | 17.4  |
| <b>Middle</b>  | 0                                | 0.0 | 20.8    | 0   | 0.0  | 17.3  | 0    | 0.0   | 10.3    | 0   | 0.0   | 8.0                         | 17.8  |
| <b>Upper</b>   | 0                                | 0.0 | 41.7    | 0   | 0.0  | 59.2  | 0    | 0.0   | 55.2    | 0   | 0.0   | 62.2                        | 41.9  |
| <b>Unknown</b>   | 0                                | 0.0 | 0.0     | 0   | 0.0  | 0.0   | 0    | 0.0   | 3.4     | 0   | 0.0   | 1.7                         | 0.0   |
| <b>Total</b>   | 0                                | 0.0 | 100.0   | 0   | 0.0  | 100.0 | 0    | 0.0   | 100.0   | 0   | 0.0   | 100.0                       | 100.0 |
| Other Purpose Closed/Exempt  |                                  |     |         |     |      |       |      |       |         |     |       |                             |       |
| <b>Low</b>   | 0                                | 0.0 | 6.2     | 0   | 0.0  | 3.8   | 0    | 0.0   | 9.4     | 0   | 0.0   | 6.1                         | 22.8  |
| <b>Moderate</b>  | 0                                | 0.0 | 20.1    | 0   | 0.0  | 16.4  | 1    | 50.0  | 22.5    | 75  | 31.9  | 17.7                        | 17.4  |
| <b>Middle</b>  | 0                                | 0.0 | 28.3    | 0   | 0.0  | 26.7  | 1    | 50.0  | 27.6    | 160 | 68.1  | 26.1                        | 17.8  |
| <b>Upper</b>   | 0                                | 0.0 | 43.6    | 0   | 0.0  | 51.4  | 0    | 0.0   | 38.4    | 0   | 0.0   | 47.6                        | 41.9  |
| <b>Unknown</b>   | 0                                | 0.0 | 1.8     | 0   | 0.0  | 1.7   | 0    | 0.0   | 2.1     | 0   | 0.0   | 2.4                         | 0.0   |
| <b>Total</b>   | 0                                | 0.0 | 100.0   | 0   | 0.0  | 100.0 | 2    | 100.0 | 100.0   | 235 | 100.0 | 100.0                       | 100.0 |
| Purpose Not Applicable   |                                  |     |         |     |      |       |      |       |         |     |       |                             |       |
| <b>Low</b>   | 0                                | 0.0 | 1.9     | 0   | 0.0  | 0.8   | 0    | 0.0   | 1.6     | 0   | 0.0   | 1.1                         | 22.8  |
| <b>Moderate</b>  | 0                                | 0.0 | 1.9     | 0   | 0.0  | 1.0   | 0    | 0.0   | 4.8     | 0   | 0.0   | 3.5                         | 17.4  |
| <b>Middle</b>  | 0                                | 0.0 | 0.9     | 0   | 0.0  | 0.9   | 0    | 0.0   | 0.0     | 0   | 0.0   | 0.0                         | 17.8  |
| <b>Upper</b>   | 0                                | 0.0 | 0.0     | 0   | 0.0  | 0.0   | 0    | 0.0   | 0.0     | 0   | 0.0   | 0.0                         | 41.9  |
| <b>Unknown</b>   | 0                                | 0.0 | 95.3    | 0   | 0.0  | 97.3  | 0    | 0.0   | 93.5    | 0   | 0.0   | 95.5                        | 0.0   |
| <b>Total</b>   | 0                                | 0.0 | 100.0   | 0   | 0.0  | 100.0 | 0    | 0.0   | 100.0   | 0   | 0.0   | 100.0                       | 100.0 |

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.

**Third Coast Bank**  
**Humble, Texas**
**CRA Performance Evaluation**

August 12, 2024

**Table C2-5**

| Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses<br>Assessment Area: Beaumont MSA   |                                  |       |       |          |       |       |      |       |       |          |       |       |                    |  |
|---|----------------------------------|-------|-------|----------|-------|-------|------|-------|-------|----------|-------|-------|--------------------|--|
|   | Bank And Aggregate Loans By Year |       |       |          |       |       |      |       |       |          |       |       | Total Businesses % |  |
|   | 2022                             |       |       |          |       |       | 2023 |       |       |          |       |       |                    |  |
|   | Bank                             | Agg   | Bank  | Agg      |       |       | Bank | Agg   | Bank  | Agg      |       |       |                    |  |
|   | #                                | #%    | #%    | \$ (000) | \$ %  | \$ %  | #    | #%    | #%    | \$ (000) | \$ %  | \$ %  |                    |  |
| <b>By Revenue</b>   |                                  |       |       |          |       |       |      |       |       |          |       |       |                    |  |
| <b>\$1 Million or Less</b>  | 97                               | 49.0  | 44.3  | 18,514   | 36.5  | 36.6  | 68   | 45.3  | 46.0  | 14,443   | 35.8  | 32.0  | 92.2               |  |
| <b>Over \$1 Million</b>   | 92                               | 46.5  |       | 30,470   | 60.1  |       | 77   | 51.3  |       | 25,565   | 63.4  |       | 6.7                |  |
| <b>Revenue Unknown</b>  | 9                                | 4.5   |       | 1,744    | 3.4   |       | 5    | 3.3   |       | 339      | 0.8   |       | 1.1                |  |
| <b>Total</b>  | 198                              | 100.0 |       | 50,728   | 100.0 |       | 150  | 100.0 |       | 40,347   | 100.0 |       | 100.0              |  |
| <b>By Loan Size</b>   |                                  |       |       |          |       |       |      |       |       |          |       |       |                    |  |
| <b>\$100,000 or Less</b>  | 81                               | 40.9  | 90.0  | 5,123    | 10.1  | 30.4  | 61   | 40.7  | 90.5  | 3,918    | 9.7   | 32.2  |                    |  |
| <b>\$100,001 - \$250,000</b>  | 57                               | 28.8  | 5.5   | 10,925   | 21.5  | 19.7  | 40   | 26.7  | 5.4   | 7,346    | 18.2  | 19.8  |                    |  |
| <b>\$250,001 - \$1 Million</b>  | 60                               | 30.3  | 4.5   | 34,680   | 68.4  | 49.9  | 49   | 32.7  | 4.2   | 29,083   | 72.1  | 47.9  |                    |  |
| <b>Total</b>  | 198                              | 100.0 | 100.0 | 50,728   | 100.0 | 100.0 | 150  | 100.0 | 100.0 | 40,347   | 100.0 | 100.0 |                    |  |
| <b>By Loan Size and Revenues \$1 Million or Less</b>  |                                  |       |       |          |       |       |      |       |       |          |       |       |                    |  |
| <b>\$100,000 or Less</b>  | 49                               | 50.5  |       | 2,951    | 15.9  |       | 39   | 57.4  |       | 2,404    | 16.6  |       |                    |  |
| <b>\$100,001 - \$250,000</b>  | 25                               | 25.8  |       | 4,685    | 25.3  |       | 11   | 16.2  |       | 2,117    | 14.7  |       |                    |  |
| <b>\$250,001 - \$1 Million</b>  | 23                               | 23.7  |       | 10,878   | 58.8  |       | 18   | 26.5  |       | 9,922    | 68.7  |       |                    |  |
| <b>Total</b>  | 97                               | 100.0 |       | 18,514   | 100.0 |       | 68   | 100.0 |       | 14,443   | 100.0 |       |                    |  |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |          |       |       |      |       |       |          |       |       |                    |  |

**Table C2-6**

| Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms<br>Assessment Area: Beaumont MSA  |                                  |       |       |          |       |       |      |       |       |          |       |       |               |  |
|---|----------------------------------|-------|-------|----------|-------|-------|------|-------|-------|----------|-------|-------|---------------|--|
|   | Bank And Aggregate Loans By Year |       |       |          |       |       |      |       |       |          |       |       | Total Farms % |  |
|   | 2022                             |       |       |          |       |       | 2023 |       |       |          |       |       |               |  |
|   | Bank                             | Agg   | Bank  | Agg      |       |       | Bank | Agg   | Bank  | Agg      |       |       |               |  |
|   | #                                | #%    | #%    | \$ (000) | \$ %  | \$ %  | #    | #%    | #%    | \$ (000) | \$ %  | \$ %  |               |  |
| <b>By Revenue</b>   |                                  |       |       |          |       |       |      |       |       |          |       |       |               |  |
| <b>\$1 Million or Less</b>  | 5                                | 83.3  | 63.3  | 1,442    | 95.4  | 58.9  | 3    | 100.0 | 73.7  | 825      | 100.0 | 74.8  | 98.1          |  |
| <b>Over \$1 Million</b>   | 1                                | 16.7  |       | 69       | 4.6   |       | 0    | 0.0   |       | 0        | 0.0   |       | 1.4           |  |
| <b>Revenue Unknown</b>  | 0                                | 0.0   |       | 0        | 0.0   |       | 0    | 0.0   |       | 0        | 0.0   |       | 0.5           |  |
| <b>Total</b>  | 6                                | 100.0 |       | 1,511    | 100.0 |       | 3    | 100.0 |       | 825      | 100.0 |       | 100.0         |  |
| <b>By Loan Size</b>   |                                  |       |       |          |       |       |      |       |       |          |       |       |               |  |
| <b>\$100,000 or Less</b>  | 2                                | 33.3  | 78.5  | 133      | 8.8   | 28.2  | 0    | 0.0   | 86.8  | 0        | 0.0   | 38.3  |               |  |
| <b>\$100,001 - \$250,000</b>  | 0                                | 0.0   | 13.9  | 0        | 0.0   | 33.1  | 1    | 33.3  | 6.6   | 125      | 15.2  | 21.2  |               |  |
| <b>\$250,001 - \$500,000</b>  | 4                                | 66.7  | 7.6   | 1,378    | 91.2  | 38.7  | 2    | 66.7  | 6.6   | 700      | 84.8  | 40.6  |               |  |
| <b>Total</b>  | 6                                | 100.0 | 100.0 | 1,511    | 100.0 | 100.0 | 3    | 100.0 | 100.0 | 825      | 100.0 | 100.0 |               |  |
| <b>By Loan Size and Revenues \$1 Million or Less</b>  |                                  |       |       |          |       |       |      |       |       |          |       |       |               |  |
| <b>\$100,000 or Less</b>  | 1                                | 20.0  |       | 64       | 4.4   |       | 0    | 0.0   |       | 0        | 0.0   |       |               |  |
| <b>\$100,001 - \$250,000</b>  | 0                                | 0.0   |       | 0        | 0.0   |       | 1    | 33.3  |       | 125      | 15.2  |       |               |  |
| <b>\$250,001 - \$500,000</b>  | 4                                | 80.0  |       | 1,378    | 95.6  |       | 2    | 66.7  |       | 700      | 84.8  |       |               |  |
| <b>Total</b>  | 5                                | 100.0 |       | 1,442    | 100.0 |       | 3    | 100.0 |       | 825      | 100.0 |       |               |  |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |          |       |       |      |       |       |          |       |       |               |  |

## Austin Metropolitan AA

Table C3-1

| Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography<br>Assessment Area: Austin Metropolitan |                                  |       |         |       |       |       |     |       |         |     |       |                              |  |
|--|----------------------------------|-------|---------|-------|-------|-------|-----|-------|---------|-----|-------|------------------------------|--|
| Geographic<br>Income<br>Level  | Bank And Aggregate Loans By Year |       |         |       |       |       |     |       |         |     |       | Owner<br>Occupied<br>Units % |  |
|  | 2022                             |       |         |       |       | 2023  |     |       |         |     |       |                              |  |
|  | Bank                             | Agg   | Bank    | Agg   |       | Bank  | Agg | Bank  | Agg     |     |       |                              |  |
| #  | #%                               | #%    | \$(000) | \$%   | \$%   | #     | #%  | #%    | \$(000) | \$% | \$%   |                              |  |
| <b>Home Purchase Loans</b>   |                                  |       |         |       |       |       |     |       |         |     |       |                              |  |
| <b>Low</b>   | 0                                | 0.0   | 0.3     | 0     | 0.0   | 0.2   | 0   | 0.0   | 0.4     | 0   | 0.0   | 0.2                          |  |
| <b>Moderate</b>  | 0                                | 0.0   | 13.3    | 0     | 0.0   | 12.4  | 0   | 0.0   | 14.2    | 0   | 0.0   | 13.5                         |  |
| <b>Middle</b>  | 2                                | 100.0 | 51.6    | 1,802 | 100.0 | 47.7  | 1   | 50.0  | 48.1    | 420 | 73.7  | 43.5                         |  |
| <b>Upper</b>   | 0                                | 0.0   | 34.8    | 0     | 0.0   | 39.6  | 1   | 50.0  | 37.3    | 150 | 26.3  | 42.7                         |  |
| <b>Unknown</b>   | 0                                | 0.0   | 0.0     | 0     | 0.0   | 0.0   | 0   | 0.0   | 0.0     | 0   | 0.0   | 0.0                          |  |
| <b>Total</b>   | 2                                | 100.0 | 100.0   | 1,802 | 100.0 | 100.0 | 2   | 100.0 | 100.0   | 570 | 100.0 | 100.0                        |  |
| <b>Refinance Loans</b>   |                                  |       |         |       |       |       |     |       |         |     |       |                              |  |
| <b>Low</b>   | 0                                | 0.0   | 0.5     | 0     | 0.0   | 0.4   | 0   | 0.0   | 1.3     | 0   | 0.0   | 1.6                          |  |
| <b>Moderate</b>  | 0                                | 0.0   | 12.8    | 0     | 0.0   | 11.3  | 0   | 0.0   | 15.3    | 0   | 0.0   | 13.5                         |  |
| <b>Middle</b>  | 0                                | 0.0   | 50.1    | 0     | 0.0   | 45.8  | 0   | 0.0   | 47.9    | 0   | 0.0   | 43.6                         |  |
| <b>Upper</b>   | 0                                | 0.0   | 36.6    | 0     | 0.0   | 42.6  | 0   | 0.0   | 35.5    | 0   | 0.0   | 41.3                         |  |
| <b>Unknown</b>   | 0                                | 0.0   | 0.0     | 0     | 0.0   | 0.0   | 0   | 0.0   | 0.0     | 0   | 0.0   | 0.0                          |  |
| <b>Total</b>   | 0                                | 0.0   | 100.0   | 0     | 0.0   | 100.0 | 0   | 0.0   | 100.0   | 0   | 0.0   | 100.0                        |  |
| <b>Home Improvement Loans</b>  |                                  |       |         |       |       |       |     |       |         |     |       |                              |  |
| <b>Low</b>   | 0                                | 0.0   | 0.3     | 0     | 0.0   | 0.4   | 0   | 0.0   | 0.3     | 0   | 0.0   | 0.7                          |  |
| <b>Moderate</b>  | 0                                | 0.0   | 12.5    | 0     | 0.0   | 11.4  | 0   | 0.0   | 9.8     | 0   | 0.0   | 6.7                          |  |
| <b>Middle</b>  | 0                                | 0.0   | 41.2    | 0     | 0.0   | 37.1  | 0   | 0.0   | 47.9    | 0   | 0.0   | 43.2                         |  |
| <b>Upper</b>   | 0                                | 0.0   | 46.0    | 0     | 0.0   | 51.2  | 0   | 0.0   | 42.0    | 0   | 0.0   | 49.4                         |  |
| <b>Unknown</b>   | 0                                | 0.0   | 0.0     | 0     | 0.0   | 0.0   | 0   | 0.0   | 0.0     | 0   | 0.0   | 0.0                          |  |
| <b>Total</b>   | 0                                | 0.0   | 100.0   | 0     | 0.0   | 100.0 | 0   | 0.0   | 100.0   | 0   | 0.0   | 100.0                        |  |
| <b>Multifamily Loans</b>   |                                  |       |         |       |       |       |     |       |         |     |       |                              |  |
| <b>Low</b>   | 0                                | 0.0   | 7.3     | 0     | 0.0   | 8.9   | 0   | 0.0   | 0.0     | 0   | 0.0   | 0.0                          |  |
| <b>Moderate</b>  | 0                                | 0.0   | 26.8    | 0     | 0.0   | 22.7  | 0   | 0.0   | 9.1     | 0   | 0.0   | 0.8                          |  |
| <b>Middle</b>  | 0                                | 0.0   | 43.9    | 0     | 0.0   | 41.9  | 0   | 0.0   | 81.8    | 0   | 0.0   | 88.2                         |  |
| <b>Upper</b>   | 0                                | 0.0   | 22.0    | 0     | 0.0   | 26.5  | 0   | 0.0   | 9.1     | 0   | 0.0   | 11.0                         |  |
| <b>Unknown</b>   | 0                                | 0.0   | 0.0     | 0     | 0.0   | 0.0   | 0   | 0.0   | 0.0     | 0   | 0.0   | 0.0                          |  |
| <b>Total</b>   | 0                                | 0.0   | 100.0   | 0     | 0.0   | 100.0 | 0   | 0.0   | 100.0   | 0   | 0.0   | 100.0                        |  |
| <b>Total Home Mortgage Loans</b>   |                                  |       |         |       |       |       |     |       |         |     |       |                              |  |
| <b>Low</b>   | 0                                | 0.0   | 0.4     | 0     | 0.0   | 1.0   | 0   | 0.0   | 0.4     | 0   | 0.0   | 0.3                          |  |
| <b>Moderate</b>  | 0                                | 0.0   | 13.1    | 0     | 0.0   | 13.1  | 0   | 0.0   | 14.1    | 0   | 0.0   | 13.0                         |  |
| <b>Middle</b>  | 2                                | 100.0 | 50.5    | 1,802 | 100.0 | 46.6  | 1   | 50.0  | 48.1    | 420 | 73.7  | 45.0                         |  |
| <b>Upper</b>   | 0                                | 0.0   | 36.0    | 0     | 0.0   | 39.3  | 1   | 50.0  | 37.3    | 150 | 26.3  | 41.7                         |  |
| <b>Unknown</b>   | 0                                | 0.0   | 0.0     | 0     | 0.0   | 0.0   | 0   | 0.0   | 0.0     | 0   | 0.0   | 0.0                          |  |
| <b>Total</b>   | 2                                | 100.0 | 100.0   | 1,802 | 100.0 | 100.0 | 2   | 100.0 | 100.0   | 570 | 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 C3-2

| Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography<br>Assessment Area: Austin Metropolitan |                                  |              |              |              |              |              |          |              |              |            |              |              |                          |  |
|---|----------------------------------|--------------|--------------|--------------|--------------|--------------|----------|--------------|--------------|------------|--------------|--------------|--------------------------|--|
| Geographic<br>Income<br>Level   | Bank And Aggregate Loans By Year |              |              |              |              |              |          |              |              |            |              |              | Total<br>Businesses<br>% |  |
|   | 2022                             |              |              |              |              |              | 2023     |              |              |            |              |              |                          |  |
|   | Bank                             | Agg          | Bank         | Agg          |              |              | Bank     | Agg          | Bank         | Agg        |              |              |                          |  |
| #   | #%                               | #%           | \$ (000)     | \$ %         | \$ %         |              | #        | #%           | #%           | \$ (000)   | \$ %         | \$ %         |                          |  |
| Low   | 1                                | 20.0         | 2.4          | 950          | 49.0         | 3.8          | 0        | 0.0          | 2.1          | 0          | 0.0          | 3.6          | 3.7                      |  |
| Moderate  | 0                                | 0.0          | 15.9         | 0            | 0.0          | 18.6         | 0        | 0.0          | 15.4         | 0          | 0.0          | 18.5         | 18.8                     |  |
| Middle  | 1                                | 20.0         | 46.6         | 162          | 8.4          | 48.0         | 1        | 33.3         | 45.9         | 384        | 62.1         | 47.9         | 46.2                     |  |
| Upper   | 3                                | 60.0         | 34.5         | 825          | 42.6         | 29.4         | 2        | 66.7         | 36.3         | 234        | 37.9         | 29.9         | 31.3                     |  |
| Unknown   | 0                                | 0.0          | 0.0          | 0            | 0.0          | 0.0          | 0        | 0.0          | 0.0          | 0          | 0.0          | 0.0          | 0.0                      |  |
| <b>Total</b>  | <b>5</b>                         | <b>100.0</b> | <b>100.0</b> | <b>1,937</b> | <b>100.0</b> | <b>100.0</b> | <b>3</b> | <b>100.0</b> | <b>100.0</b> | <b>618</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>             |  |

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 C3-3

| Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level<br>Assessment Area: Austin Metropolitan |                                  |       |         |       |       |       |      |         |       |     |         |                                   |       |
|--|----------------------------------|-------|---------|-------|-------|-------|------|---------|-------|-----|---------|-----------------------------------|-------|
| Borrower<br>Income<br>Level  | Bank And Aggregate Loans By Year |       |         |       |       |       |      |         |       |     |         | Families by<br>Family<br>Income % |       |
|  | 2022                             |       |         |       | 2023  |       |      |         |       |     |         |                                   |       |
|  | Bank                             | Agg   | Bank    | Agg   | Bank  | Agg   | Bank | Agg     | Bank  | Agg | Bank    | Agg                               |       |
| #  | #%                               | #%    | \$(000) | \$%   | #     | #%    | #%   | \$(000) | \$%   | #%  | \$(000) | \$%                               | \$%   |
| <b>Home Purchase Loans</b>   |                                  |       |         |       |       |       |      |         |       |     |         |                                   |       |
| <b>Low</b>   | 0                                | 0.0   | 1.7     | 0     | 0.0   | 0.8   | 0    | 0.0     | 1.9   | 0   | 0.0     | 0.9                               | 17.4  |
| <b>Moderate</b>  | 0                                | 0.0   | 11.3    | 0     | 0.0   | 7.9   | 0    | 0.0     | 12.4  | 0   | 0.0     | 8.9                               | 17.5  |
| <b>Middle</b>  | 0                                | 0.0   | 22.1    | 0     | 0.0   | 20.1  | 0    | 0.0     | 21.5  | 0   | 0.0     | 19.7                              | 22.8  |
| <b>Upper</b>   | 2                                | 100.0 | 45.9    | 1,802 | 100.0 | 51.7  | 2    | 100.0   | 35.1  | 570 | 100.0   | 41.6                              | 42.2  |
| <b>Unknown</b>   | 0                                | 0.0   | 19.0    | 0     | 0.0   | 19.4  | 0    | 0.0     | 29.1  | 0   | 0.0     | 29.0                              | 0.0   |
| <b>Total</b>   | 2                                | 100.0 | 100.0   | 1,802 | 100.0 | 100.0 | 2    | 100.0   | 100.0 | 570 | 100.0   | 100.0                             | 100.0 |
| <b>Refinance Loans</b>   |                                  |       |         |       |       |       |      |         |       |     |         |                                   |       |
| <b>Low</b>   | 0                                | 0.0   | 7.5     | 0     | 0.0   | 4.6   | 0    | 0.0     | 9.6   | 0   | 0.0     | 5.5                               | 17.4  |
| <b>Moderate</b>  | 0                                | 0.0   | 18.7    | 0     | 0.0   | 14.6  | 0    | 0.0     | 19.7  | 0   | 0.0     | 13.9                              | 17.5  |
| <b>Middle</b>  | 0                                | 0.0   | 24.7    | 0     | 0.0   | 23.0  | 0    | 0.0     | 25.3  | 0   | 0.0     | 22.7                              | 22.8  |
| <b>Upper</b>   | 0                                | 0.0   | 37.4    | 0     | 0.0   | 45.5  | 0    | 0.0     | 34.2  | 0   | 0.0     | 43.2                              | 42.2  |
| <b>Unknown</b>   | 0                                | 0.0   | 11.6    | 0     | 0.0   | 12.3  | 0    | 0.0     | 11.2  | 0   | 0.0     | 14.8                              | 0.0   |
| <b>Total</b>   | 0                                | 0.0   | 100.0   | 0     | 0.0   | 100.0 | 0    | 0.0     | 100.0 | 0   | 0.0     | 100.0                             | 100.0 |
| <b>Home Improvement Loans</b>  |                                  |       |         |       |       |       |      |         |       |     |         |                                   |       |
| <b>Low</b>   | 0                                | 0.0   | 6.8     | 0     | 0.0   | 4.6   | 0    | 0.0     | 6.9   | 0   | 0.0     | 4.4                               | 17.4  |
| <b>Moderate</b>  | 0                                | 0.0   | 13.7    | 0     | 0.0   | 8.8   | 0    | 0.0     | 16.9  | 0   | 0.0     | 10.4                              | 17.5  |
| <b>Middle</b>  | 0                                | 0.0   | 23.1    | 0     | 0.0   | 19.0  | 0    | 0.0     | 25.7  | 0   | 0.0     | 20.6                              | 22.8  |
| <b>Upper</b>   | 0                                | 0.0   | 55.2    | 0     | 0.0   | 65.3  | 0    | 0.0     | 49.3  | 0   | 0.0     | 62.7                              | 42.2  |
| <b>Unknown</b>   | 0                                | 0.0   | 1.2     | 0     | 0.0   | 2.4   | 0    | 0.0     | 1.1   | 0   | 0.0     | 2.0                               | 0.0   |
| <b>Total</b>   | 0                                | 0.0   | 100.0   | 0     | 0.0   | 100.0 | 0    | 0.0     | 100.0 | 0   | 0.0     | 100.0                             | 100.0 |
| <b>Total Home Mortgage Loans</b>   |                                  |       |         |       |       |       |      |         |       |     |         |                                   |       |
| <b>Low</b>   | 0                                | 0.0   | 3.4     | 0     | 0.0   | 1.7   | 0    | 0.0     | 3.0   | 0   | 0.0     | 1.3                               | 17.4  |
| <b>Moderate</b>  | 0                                | 0.0   | 13.2    | 0     | 0.0   | 9.2   | 0    | 0.0     | 13.4  | 0   | 0.0     | 9.2                               | 17.5  |
| <b>Middle</b>  | 0                                | 0.0   | 22.7    | 0     | 0.0   | 20.6  | 0    | 0.0     | 22.1  | 0   | 0.0     | 19.8                              | 22.8  |
| <b>Upper</b>   | 2                                | 100.0 | 44.2    | 1,802 | 100.0 | 50.7  | 2    | 100.0   | 35.5  | 570 | 100.0   | 41.9                              | 42.2  |
| <b>Unknown</b>   | 0                                | 0.0   | 16.5    | 0     | 0.0   | 17.8  | 0    | 0.0     | 26.1  | 0   | 0.0     | 27.7                              | 0.0   |
| <b>Total</b>   | 2                                | 100.0 | 100.0   | 1,802 | 100.0 | 100.0 | 2    | 100.0   | 100.0 | 570 | 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 C3-4

| Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses<br>Assessment Area: Austin Metropolitan  |                                  |       |       |         |       |       |      |       |       |         |       |                    |       |
|---|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|--------------------|-------|
|   | Bank And Aggregate Loans By Year |       |       |         |       |       |      |       |       |         |       | Total Businesses % |       |
|   | 2022                             |       |       |         | 2023  |       |      |       |       |         |       |                    |       |
|   | Bank                             | Agg   | Bank  | Agg     | Bank  | Agg   | Bank | Agg   | Bank  | Agg     | Bank  | Agg                |       |
|   | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%                |       |
| <b>By Revenue</b>   |                                  |       |       |         |       |       |      |       |       |         |       |                    |       |
| <b>\$1 Million or Less</b>  | 5                                | 100.0 | 49.8  | 1,937   | 100.0 | 36.0  | 3    | 100.0 | 53.6  | 618     | 100.0 | 39.4               | 94.2  |
| <b>Over \$1 Million</b>   | 0                                | 0.0   |       | 0       | 0.0   |       | 0    | 0.0   |       | 0       | 0.0   |                    | 4.7   |
| <b>Revenue Unknown</b>  | 0                                | 0.0   |       | 0       | 0.0   |       | 0    | 0.0   |       | 0       | 0.0   |                    | 1.1   |
| <b>Total</b>  | 5                                | 100.0 |       | 1,937   | 100.0 |       | 3    | 100.0 |       | 618     | 100.0 |                    | 100.0 |
| <b>By Loan Size</b>   |                                  |       |       |         |       |       |      |       |       |         |       |                    |       |
| <b>\$100,000 or Less</b>  | 1                                | 20.0  | 95.4  | 100     | 5.2   | 45.8  | 1    | 33.3  | 95.7  | 100     | 16.2  | 47.5               |       |
| <b>\$100,001 - \$250,000</b>  | 2                                | 40.0  | 2.4   | 387     | 20.0  | 13.6  | 1    | 33.3  | 2.4   | 134     | 21.7  | 14.3               |       |
| <b>\$250,001 - \$1 Million</b>  | 2                                | 40.0  | 2.2   | 1,450   | 74.9  | 40.5  | 1    | 33.3  | 1.9   | 384     | 62.1  | 38.2               |       |
| <b>Total</b>  | 5                                | 100.0 | 100.0 | 1,937   | 100.0 | 100.0 | 3    | 100.0 | 100.0 | 618     | 100.0 | 100.0              |       |
| <b>By Loan Size and Revenues \$1 Million or Less</b>  |                                  |       |       |         |       |       |      |       |       |         |       |                    |       |
| <b>\$100,000 or Less</b>  | 1                                | 20.0  |       | 100     | 5.2   |       | 1    | 33.3  |       | 100     | 16.2  |                    |       |
| <b>\$100,001 - \$250,000</b>  | 2                                | 40.0  |       | 387     | 20.0  |       | 1    | 33.3  |       | 134     | 21.7  |                    |       |
| <b>\$250,001 - \$1 Million</b>  | 2                                | 40.0  |       | 1,450   | 74.9  |       | 1    | 33.3  |       | 384     | 62.1  |                    |       |
| <b>Total</b>  | 5                                | 100.0 |       | 1,937   | 100.0 |       | 3    | 100.0 |       | 618     | 100.0 |                    |       |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |         |       |       |      |       |       |         |       |                    |       |

## APPENDIX D – DEMOGRAPHIC DATA AND LENDING TABLES OF METROPOLITAN LIMITED-SCOPE ASSESSMENT AREAS

## Dallas-Fort Worth Metropolitan AA

Table D1-1

| 2022 AA Combined Demographics<br>Assessment Area: Dallas-Fort Worth Metropolitan  |                                    |            |                          |                  |  |                      |                           |       |
|---|------------------------------------|------------|--------------------------|------------------|--|----------------------|---------------------------|-------|
| Income Categories   | Tract Distribution                 |            | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |       |
|   | #                                  | %          | #                        | %                | #  | %                    | #                         | %     |
| Low   | 144                                | 11.0       | 129,356                  | 9.4              | 33,556   | 25.9                 | 324,039                   | 23.7  |
| Moderate  | 372                                | 28.3       | 360,599                  | 26.3             | 50,483   | 14.0                 | 243,386                   | 17.8  |
| Middle  | 362                                | 27.5       | 401,822                  | 29.3             | 24,908   | 6.2                  | 261,069                   | 19.1  |
| Upper   | 415                                | 31.6       | 471,648                  | 34.4             | 12,948   | 2.7                  | 541,645                   | 39.5  |
| Unknown   | 21                                 | 1.6        | 6,714                    | 0.5              | 1,069  | 15.9                 | 0                         | 0.0   |
| Total AA  | 1,314                              | 100.0      | 1,370,139                | 100.0            | 122,964  | 9.0                  | 1,370,139                 | 100.0 |
| Housing Units by Tract  | Housing Type by Tract              |            |                          |                  |  |                      |                           |       |
|   | Owner-occupied                     |            |                          | Rental           |  | Vacant               |                           |       |
|   | #                                  | % by tract | % by unit                | #                | % by unit  | #                    | % by unit                 |       |
| Low   | 239,666                            | 61,702     | 5.4                      | 25.7             | 151,704  | 63.3                 | 26,260                    | 11.0  |
| Moderate  | 585,154                            | 255,511    | 22.4                     | 43.7             | 281,915  | 48.2                 | 47,728                    | 8.2   |
| Middle  | 641,176                            | 351,287    | 30.8                     | 54.8             | 247,974  | 38.7                 | 41,915                    | 6.5   |
| Upper   | 698,338                            | 468,176    | 41.0                     | 67.0             | 186,617  | 26.7                 | 43,545                    | 6.2   |
| Unknown   | 20,046                             | 4,291      | 0.4                      | 21.4             | 12,756   | 63.6                 | 2,999                     | 15.0  |
| Total AA  | 2,184,380                          | 1,140,967  | 100.0                    | 52.2             | 880,966  | 40.3                 | 162,447                   | 7.4   |
| Total Businesses by Tract   | Businesses by Tract & Revenue Size |            |                          |                  |  |                      |                           |       |
|   | Less Than or = \$1 Million         |            |                          | Over \$1 Million |  | Revenue Not Reported |                           |       |
|   | #                                  | %          | #                        | %                | #  | %                    | #                         | %     |
| Low   | 20,112                             | 6.0        | 18,469                   | 6.0              | 1,506  | 6.8                  | 137                       | 3.3   |
| Moderate  | 69,855                             | 20.8       | 63,970                   | 20.7             | 5,292  | 24.0                 | 593                       | 14.4  |
| Middle  | 100,899                            | 30.0       | 93,247                   | 30.1             | 6,646  | 30.1                 | 1,006                     | 24.5  |
| Upper   | 142,010                            | 42.3       | 131,394                  | 42.4             | 8,278  | 37.5                 | 2,338                     | 56.9  |
| Unknown   | 3,045                              | 0.9        | 2,659                    | 0.9              | 354  | 1.6                  | 32                        | 0.8   |
| Total AA  | 335,921                            | 100.0      | 309,739                  | 100.0            | 22,076   | 100.0                | 4,106                     | 100.0 |
| Percentage of Total Businesses:   |                                    |            | 92.2                     |                  |  | 6.6                  |                           | 1.2   |
| Total Farms by Tract  | Farms by Tract & Revenue Size      |            |                          |                  |  |                      |                           |       |
|   | Less Than or = \$1 Million         |            |                          | Over \$1 Million |  | Revenue Not Reported |                           |       |
|   | #                                  | %          | #                        | %                | #  | %                    | #                         | %     |
| Low   | 66                                 | 3.0        | 65                       | 3.0              | 1  | 2.9                  | 0                         | 0.0   |
| Moderate  | 297                                | 13.5       | 292                      | 13.5             | 5  | 14.7                 | 0                         | 0.0   |
| Middle  | 637                                | 29.0       | 628                      | 29.1             | 9  | 26.5                 | 0                         | 0.0   |
| Upper   | 1,178                              | 53.7       | 1,158                    | 53.6             | 19   | 55.9                 | 1                         | 100.0 |
| Unknown   | 17                                 | 0.8        | 17                       | 0.8              | 0  | 0.0                  | 0                         | 0.0   |
| Total AA  | 2,195                              | 100.0      | 2,160                    | 100.0            | 34   | 100.0                | 1                         | 100.0 |
| Percentage of Total Farms:  |                                    |            | 98.4                     |                  |  | 1.5                  |                           | 0.0   |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                    |            |                          |                  |  |                      |                           |       |

Table D1-2

| 2023 AA Combined Demographics<br>Assessment Area: Dallas-Fort Worth Metropolitan  |                                    |            |                          |        |  |        |                           |       |
|---|------------------------------------|------------|--------------------------|--------|--|--------|---------------------------|-------|
| Income Categories   | Tract Distribution                 |            | Families by Tract Income |        | Families < Poverty Level as % of Families by Tract |        | Families by Family Income |       |
|   | #                                  | %          | #                        | %      | #  | %      | #                         | %     |
| Low   | 144                                | 11.0       | 129,356                  | 9.4    | 33,556   | 25.9   | 324,039                   | 23.7  |
| Moderate  | 372                                | 28.3       | 360,599                  | 26.3   | 50,483   | 14.0   | 243,386                   | 17.8  |
| Middle  | 362                                | 27.5       | 401,822                  | 29.3   | 24,908   | 6.2    | 261,069                   | 19.1  |
| Upper   | 415                                | 31.6       | 471,648                  | 34.4   | 12,948   | 2.7    | 541,645                   | 39.5  |
| Unknown   | 21                                 | 1.6        | 6,714                    | 0.5    | 1,069  | 15.9   | 0                         | 0.0   |
| Total AA  | 1,314                              | 100.0      | 1,370,139                | 100.0  | 122,964  | 9.0    | 1,370,139                 | 100.0 |
| Housing Units by Tract  | Housing Type by Tract              |            |                          |        |  |        |                           |       |
|   | Owner-occupied                     |            |                          | Rental |  | Vacant |                           |       |
|   | #                                  | % by tract | % by unit                | #      | % by unit  | #      | % by unit                 |       |
| Low   | 239,666                            | 61,702     | 5.4                      | 25.7   | 151,704  | 63.3   | 26,260                    | 11.0  |
| Moderate  | 585,154                            | 255,511    | 22.4                     | 43.7   | 281,915  | 48.2   | 47,728                    | 8.2   |
| Middle  | 641,176                            | 351,287    | 30.8                     | 54.8   | 247,974  | 38.7   | 41,915                    | 6.5   |
| Upper   | 698,338                            | 468,176    | 41.0                     | 67.0   | 186,617  | 26.7   | 43,545                    | 6.2   |
| Unknown   | 20,046                             | 4,291      | 0.4                      | 21.4   | 12,756   | 63.6   | 2,999                     | 15.0  |
| Total AA  | 2,184,380                          | 1,140,967  | 100.0                    | 52.2   | 880,966  | 40.3   | 162,447                   | 7.4   |
| Total Businesses by Tract   | Businesses by Tract & Revenue Size |            |                          |        |  |        |                           |       |
|   | Less Than or = \$1 Million         |            | Over \$1 Million         |        | Revenue Not Reported                               |        |                           |       |
|   | #                                  | %          | #                        | %      | #  | %      | #                         | %     |
| Low   | 19,279                             | 6.0        | 17,695                   | 6.0    | 1,464  | 6.9    | 120                       | 3.3   |
| Moderate  | 67,069                             | 20.9       | 61,446                   | 20.8   | 5,104  | 24.0   | 519                       | 14.2  |
| Middle  | 96,466                             | 30.1       | 89,198                   | 30.2   | 6,379  | 29.9   | 889                       | 24.3  |
| Upper   | 135,065                            | 42.1       | 124,942                  | 42.3   | 8,026  | 37.7   | 2,097                     | 57.4  |
| Unknown   | 2,781                              | 0.9        | 2,418                    | 0.8    | 335  | 1.6    | 28                        | 0.8   |
| Total AA  | 320,660                            | 100.0      | 295,699                  | 100.0  | 21,308   | 100.0  | 3,653                     | 100.0 |
| Percentage of Total Businesses:   |                                    |            | 92.2                     |        |  | 6.6    |                           | 1.1   |
| Total Farms by Tract  | Farms by Tract & Revenue Size      |            |                          |        |  |        |                           |       |
|   | Less Than or = \$1 Million         |            | Over \$1 Million         |        | Revenue Not Reported                               |        |                           |       |
|   | #                                  | %          | #                        | %      | #  | %      | #                         | %     |
| Low   | 60                                 | 2.9        | 59                       | 2.9    | 1  | 2.9    | 0                         | 0.0   |
| Moderate  | 284                                | 13.5       | 279                      | 13.5   | 5  | 14.7   | 0                         | 0.0   |
| Middle  | 621                                | 29.5       | 611                      | 29.5   | 10   | 29.4   | 0                         | 0.0   |
| Upper   | 1,122                              | 53.3       | 1,103                    | 53.3   | 18   | 52.9   | 1                         | 100.0 |
| Unknown   | 17                                 | 0.8        | 17                       | 0.8    | 0  | 0.0    | 0                         | 0.0   |
| Total AA  | 2,104                              | 100.0      | 2,069                    | 100.0  | 34   | 100.0  | 1                         | 100.0 |
| Percentage of Total Farms:  |                                    |            | 98.3                     |        |  | 1.6    |                           | 0.0   |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                    |            |                          |        |  |        |                           |       |

Table D1-3A

| Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography<br>Assessment Area: Dallas Fort Worth (DFW) Metropolitan |                                  |       |          |        |       |       |     |       |          |        |                              |       |
|---|----------------------------------|-------|----------|--------|-------|-------|-----|-------|----------|--------|------------------------------|-------|
| Geographic<br>Income<br>Level   | Bank And Aggregate Loans By Year |       |          |        |       |       |     |       |          |        | Owner<br>Occupied<br>Units % |       |
|   | 2022                             |       |          |        |       | 2023  |     |       |          |        |                              |       |
|   | Bank                             | Agg   | Bank     | Agg    | \$%   | Bank  | Agg | Bank  | Agg      | \$%    |                              |       |
| #   | #%                               | #%    | \$ (000) | \$ %   | \$ %  | #     | #%  | #%    | \$ (000) | \$ %   | \$ %                         |       |
| <b>Home Purchase Loans</b>  |                                  |       |          |        |       |       |     |       |          |        |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 5.5      | 0      | 0.0   | 2.8   | 0   | 0.0   | 5.0      | 0      | 0.0                          | 3.0   |
| <b>Moderate</b>   | 1                                | 20.0  | 16.6     | 140    | 2.1   | 11.3  | 2   | 33.3  | 17.2     | 552    | 17.1                         | 12.0  |
| <b>Middle</b>   | 3                                | 60.0  | 31.7     | 5,195  | 79.7  | 26.8  | 2   | 33.3  | 33.3     | 510    | 15.8                         | 28.4  |
| <b>Upper</b>  | 1                                | 20.0  | 45.7     | 1,185  | 18.2  | 58.4  | 2   | 33.3  | 44.1     | 2,174  | 67.2                         | 56.1  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.6      | 0      | 0.0   | 0.7   | 0   | 0.0   | 0.4      | 0      | 0.0                          | 0.6   |
| <b>Total</b>  | 5                                | 100.0 | 100.0    | 6,520  | 100.0 | 100.0 | 6   | 100.0 | 100.0    | 3,236  | 100.0                        | 100.0 |
| <b>Refinance Loans</b>  |                                  |       |          |        |       |       |     |       |          |        |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 3.4      | 0      | 0.0   | 1.9   | 0   | 0.0   | 4.8      | 0      | 0.0                          | 2.7   |
| <b>Moderate</b>   | 1                                | 25.0  | 16.8     | 940    | 23.4  | 10.6  | 0   | 0.0   | 20.5     | 0      | 0.0                          | 13.7  |
| <b>Middle</b>   | 1                                | 25.0  | 33.2     | 145    | 3.6   | 25.4  | 1   | 33.3  | 32.4     | 160    | 5.9                          | 25.3  |
| <b>Upper</b>  | 2                                | 50.0  | 46.1     | 2,925  | 72.9  | 61.6  | 2   | 66.7  | 41.9     | 2,560  | 94.1                         | 57.9  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.5      | 0      | 0.0   | 0.6   | 0   | 0.0   | 0.3      | 0      | 0.0                          | 0.3   |
| <b>Total</b>  | 4                                | 100.0 | 100.0    | 4,010  | 100.0 | 100.0 | 3   | 100.0 | 100.0    | 2,720  | 100.0                        | 100.0 |
| <b>Home Improvement Loans</b>   |                                  |       |          |        |       |       |     |       |          |        |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 2.3      | 0      | 0.0   | 1.5   | 1   | 100.0 | 2.5      | 135    | 100.0                        | 2.1   |
| <b>Moderate</b>   | 0                                | 0.0   | 11.2     | 0      | 0.0   | 8.1   | 0   | 0.0   | 12.5     | 0      | 0.0                          | 8.9   |
| <b>Middle</b>   | 0                                | 0.0   | 24.2     | 0      | 0.0   | 18.6  | 0   | 0.0   | 26.5     | 0      | 0.0                          | 19.0  |
| <b>Upper</b>  | 0                                | 0.0   | 61.8     | 0      | 0.0   | 71.3  | 0   | 0.0   | 57.8     | 0      | 0.0                          | 69.2  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.5      | 0      | 0.0   | 0.5   | 0   | 0.0   | 0.7      | 0      | 0.0                          | 0.9   |
| <b>Total</b>  | 0                                | 0.0   | 100.0    | 0      | 0.0   | 100.0 | 1   | 100.0 | 100.0    | 135    | 100.0                        | 100.0 |
| <b>Multifamily Loans</b>  |                                  |       |          |        |       |       |     |       |          |        |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 18.2     | 0      | 0.0   | 10.7  | 0   | 0.0   | 26.0     | 0      | 0.0                          | 16.4  |
| <b>Moderate</b>   | 0                                | 0.0   | 36.9     | 0      | 0.0   | 28.4  | 0   | 0.0   | 28.0     | 0      | 0.0                          | 19.0  |
| <b>Middle</b>   | 0                                | 0.0   | 22.2     | 0      | 0.0   | 31.7  | 0   | 0.0   | 23.5     | 0      | 0.0                          | 27.0  |
| <b>Upper</b>  | 0                                | 0.0   | 21.2     | 0      | 0.0   | 28.2  | 1   | 100.0 | 20.4     | 6,243  | 100.0                        | 36.7  |
| <b>Unknown</b>  | 0                                | 0.0   | 1.5      | 0      | 0.0   | 1.0   | 0   | 0.0   | 2.1      | 0      | 0.0                          | 0.9   |
| <b>Total</b>  | 0                                | 0.0   | 100.0    | 0      | 0.0   | 100.0 | 1   | 100.0 | 100.0    | 6,243  | 100.0                        | 100.0 |
| <b>Total Home Mortgage Loans</b>  |                                  |       |          |        |       |       |     |       |          |        |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 4.9      | 0      | 0.0   | 3.9   | 1   | 9.1   | 4.9      | 135    | 1.1                          | 4.3   |
| <b>Moderate</b>   | 2                                | 20.0  | 16.5     | 1,080  | 9.6   | 13.9  | 2   | 18.2  | 17.4     | 552    | 4.5                          | 12.8  |
| <b>Middle</b>   | 4                                | 40.0  | 31.6     | 5,340  | 47.6  | 27.0  | 3   | 27.3  | 32.7     | 670    | 5.4                          | 27.6  |
| <b>Upper</b>  | 4                                | 40.0  | 46.5     | 4,810  | 42.8  | 54.4  | 5   | 45.5  | 44.6     | 10,978 | 89.0                         | 54.7  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.6      | 0      | 0.0   | 0.7   | 0   | 0.0   | 0.4      | 0      | 0.0                          | 0.6   |
| <b>Total</b>  | 10                               | 100.0 | 100.0    | 11,230 | 100.0 | 100.0 | 11  | 100.0 | 100.0    | 12,334 | 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 D1-3B

| Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography<br>Assessment Area: Dallas Fort Worth (DFW) Metropolitan                   |                                  |       |         |     |       |       |      |     |       |         |     |                              |       |
|---|----------------------------------|-------|---------|-----|-------|-------|------|-----|-------|---------|-----|------------------------------|-------|
| Geographic<br>Income<br>Level   | Bank And Aggregate Loans By Year |       |         |     |       |       |      |     |       |         |     | Owner<br>Occupied<br>Units % |       |
|   | 2022                             |       |         |     |       |       | 2023 |     |       |         |     |                              |       |
|   | Bank                             | Agg   | Bank    | Agg |       |       | Bank | Agg | Bank  | Agg     |     |                              |       |
| #   | #%                               | #%    | \$(000) | \$% | \$%   |       | #    | #%  | #%    | \$(000) | \$% | \$%                          |       |
| <b>Other Purpose LOC</b>  |                                  |       |         |     |       |       |      |     |       |         |     |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 0.9     | 0   | 0.0   | 0.4   | 0    | 0.0 | 1.6   | 0       | 0.0 | 0.9                          | 5.4   |
| <b>Moderate</b>   | 0                                | 0.0   | 8.1     | 0   | 0.0   | 5.0   | 0    | 0.0 | 10.4  | 0       | 0.0 | 6.3                          | 22.4  |
| <b>Middle</b>   | 0                                | 0.0   | 22.8    | 0   | 0.0   | 14.5  | 0    | 0.0 | 25.8  | 0       | 0.0 | 16.5                         | 30.8  |
| <b>Upper</b>  | 0                                | 0.0   | 67.5    | 0   | 0.0   | 79.5  | 0    | 0.0 | 61.6  | 0       | 0.0 | 75.7                         | 41.0  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.7     | 0   | 0.0   | 0.5   | 0    | 0.0 | 0.6   | 0       | 0.0 | 0.7                          | 0.4   |
| <b>Tract-Unk</b>  | 0                                | 0.0   | 0.0     | 0   | 0.0   | 0.0   | 0    | 0.0 | 0.0   | 0       | 0.0 | 0.0                          |       |
| <b>Total</b>  | 0                                | 0.0   | 100.0   | 0   | 0.0   | 100.0 | 0    | 0.0 | 100.0 | 0       | 0.0 | 100.0                        | 100.0 |
| <b>Other Purpose Closed/Exempt</b>  |                                  |       |         |     |       |       |      |     |       |         |     |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 3.9     | 0   | 0.0   | 1.6   | 0    | 0.0 | 3.4   | 0       | 0.0 | 2.1                          | 5.4   |
| <b>Moderate</b>   | 0                                | 0.0   | 13.4    | 0   | 0.0   | 6.4   | 0    | 0.0 | 17.6  | 0       | 0.0 | 11.7                         | 22.4  |
| <b>Middle</b>   | 0                                | 0.0   | 26.8    | 0   | 0.0   | 13.5  | 0    | 0.0 | 30.1  | 0       | 0.0 | 18.5                         | 30.8  |
| <b>Upper</b>  | 1                                | 100.0 | 55.2    | 700 | 100.0 | 77.7  | 0    | 0.0 | 48.4  | 0       | 0.0 | 67.0                         | 41.0  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.7     | 0   | 0.0   | 0.9   | 0    | 0.0 | 0.5   | 0       | 0.0 | 0.7                          | 0.4   |
| <b>Tract-Unk</b>  | 0                                | 0.0   | 0.0     | 0   | 0.0   | 0.0   | 0    | 0.0 | 0.0   | 0       | 0.0 | 0.0                          |       |
| <b>Total</b>  | 1                                | 100.0 | 100.0   | 700 | 100.0 | 100.0 | 0    | 0.0 | 100.0 | 0       | 0.0 | 100.0                        | 100.0 |
| <b>Purpose Not Applicable</b>   |                                  |       |         |     |       |       |      |     |       |         |     |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 14.1    | 0   | 0.0   | 12.3  | 0    | 0.0 | 8.2   | 0       | 0.0 | 6.5                          | 5.4   |
| <b>Moderate</b>   | 0                                | 0.0   | 30.3    | 0   | 0.0   | 17.2  | 0    | 0.0 | 33.3  | 0       | 0.0 | 25.8                         | 22.4  |
| <b>Middle</b>   | 0                                | 0.0   | 36.2    | 0   | 0.0   | 49.6  | 0    | 0.0 | 38.6  | 0       | 0.0 | 36.9                         | 30.8  |
| <b>Upper</b>  | 0                                | 0.0   | 19.4    | 0   | 0.0   | 20.5  | 0    | 0.0 | 19.8  | 0       | 0.0 | 30.6                         | 41.0  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.1     | 0   | 0.0   | 0.4   | 0    | 0.0 | 0.1   | 0       | 0.0 | 0.2                          | 0.4   |
| <b>Tract-Unk</b>  | 0                                | 0.0   | 0.0     | 0   | 0.0   | 0.0   | 0    | 0.0 | 0.0   | 0       | 0.0 | 0.0                          |       |
| <b>Total</b>  | 0                                | 0.0   | 100.0   | 0   | 0.0   | 100.0 | 0    | 0.0 | 100.0 | 0       | 0.0 | 100.0                        | 100.0 |
| Source: 2023 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |         |     |       |       |      |     |       |         |     |                              |       |

**Third Coast Bank**  
**Humble, Texas**
**CRA Performance Evaluation**  
**August 12, 2024**
**Table D1-4**

| Geographic Income Level | Bank And Aggregate Loans By Year |              |              |               |              |              |           |              |              |               |              |              | Total Businesses % |  |
|-------------------------|----------------------------------|--------------|--------------|---------------|--------------|--------------|-----------|--------------|--------------|---------------|--------------|--------------|--------------------|--|
|                         | 2022                             |              |              |               |              |              | 2023      |              |              |               |              |              |                    |  |
|                         | Bank                             |              | Agg          | Bank          |              | Agg          | Bank      |              | Agg          | Bank          |              | Agg          |                    |  |
|                         | #                                | #%           | #%           | \$(000)       | \$%          | \$%          | #         | #%           | #%           | \$(000)       | \$%          | \$%          |                    |  |
| Low                     | 2                                | 4.1          | 5.1          | 1,231         | 6.8          | 5.3          | 2         | 8.0          | 5.1          | 1,750         | 17.2         | 4.9          | 6.0                |  |
| Moderate                | 8                                | 16.3         | 19.9         | 2,898         | 15.9         | 20.1         | 2         | 8.0          | 19.4         | 700           | 6.9          | 19.9         | 20.9               |  |
| Middle                  | 17                               | 34.7         | 28.6         | 5,538         | 30.4         | 27.4         | 6         | 24.0         | 28.1         | 2,312         | 22.7         | 27.6         | 30.1               |  |
| Upper                   | 22                               | 44.9         | 45.2         | 8,556         | 47.0         | 46.0         | 15        | 60.0         | 46.1         | 5,420         | 53.2         | 46.3         | 42.1               |  |
| Unknown                 | 0                                | 0.0          | 0.9          | 0             | 0.0          | 1.1          | 0         | 0.0          | 1.0          | 0             | 0.0          | 1.2          | 0.9                |  |
| <b>Total</b>            | <b>49</b>                        | <b>100.0</b> | <b>100.0</b> | <b>18,223</b> | <b>100.0</b> | <b>100.0</b> | <b>25</b> | <b>100.0</b> | <b>100.0</b> | <b>10,182</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>       |  |

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 D1-5A**

| 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)      | \$%          | \$%          |                             |  |
| <b>Home Purchase Loans</b>       |                                  |              |              |               |              |              |           |              |              |              |              |              |                             |  |
| Low                              | 0                                | 0.0          | 2.4          | 0             | 0.0          | 1.0          | 0         | 0.0          | 1.9          | 0            | 0.0          | 0.9          | 23.7                        |  |
| Moderate                         | 0                                | 0.0          | 13.0         | 0             | 0.0          | 7.9          | 0         | 0.0          | 12.6         | 0            | 0.0          | 7.8          | 17.8                        |  |
| Middle                           | 0                                | 0.0          | 20.6         | 0             | 0.0          | 16.6         | 0         | 0.0          | 19.6         | 0            | 0.0          | 15.7         | 19.1                        |  |
| Upper                            | 4                                | 80.0         | 44.3         | 6,070         | 93.1         | 56.8         | 4         | 66.7         | 39.7         | 2,261        | 69.9         | 51.6         | 39.5                        |  |
| Unknown                          | 1                                | 20.0         | 19.7         | 450           | 6.9          | 17.7         | 2         | 33.3         | 26.1         | 975          | 30.1         | 24.0         | 0.0                         |  |
| <b>Total</b>                     | <b>5</b>                         | <b>100.0</b> | <b>100.0</b> | <b>6,520</b>  | <b>100.0</b> | <b>100.0</b> | <b>6</b>  | <b>100.0</b> | <b>100.0</b> | <b>3,236</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>                |  |
| <b>Refinance Loans</b>           |                                  |              |              |               |              |              |           |              |              |              |              |              |                             |  |
| Low                              | 0                                | 0.0          | 8.7          | 0             | 0.0          | 4.2          | 0         | 0.0          | 9.2          | 0            | 0.0          | 4.5          | 23.7                        |  |
| Moderate                         | 1                                | 25.0         | 17.5         | 261           | 6.5          | 11.0         | 0         | 0.0          | 17.7         | 0            | 0.0          | 10.4         | 17.8                        |  |
| Middle                           | 0                                | 0.0          | 20.7         | 0             | 0.0          | 16.2         | 1         | 33.3         | 19.5         | 410          | 15.1         | 14.5         | 19.1                        |  |
| Upper                            | 0                                | 0.0          | 39.9         | 0             | 0.0          | 54.1         | 2         | 66.7         | 38.0         | 2,310        | 84.9         | 50.7         | 39.5                        |  |
| Unknown                          | 3                                | 75.0         | 13.3         | 3,749         | 93.5         | 14.5         | 0         | 0.0          | 15.6         | 0            | 0.0          | 19.9         | 0.0                         |  |
| <b>Total</b>                     | <b>4</b>                         | <b>100.0</b> | <b>100.0</b> | <b>4,010</b>  | <b>100.0</b> | <b>100.0</b> | <b>3</b>  | <b>100.0</b> | <b>100.0</b> | <b>2,720</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>                |  |
| <b>Home Improvement Loans</b>    |                                  |              |              |               |              |              |           |              |              |              |              |              |                             |  |
| Low                              | 0                                | 0.0          | 5.5          | 0             | 0.0          | 3.2          | 0         | 0.0          | 5.4          | 0            | 0.0          | 3.0          | 23.7                        |  |
| Moderate                         | 0                                | 0.0          | 9.8          | 0             | 0.0          | 6.0          | 0         | 0.0          | 11.4         | 0            | 0.0          | 6.5          | 17.8                        |  |
| Middle                           | 0                                | 0.0          | 16.2         | 0             | 0.0          | 11.1         | 0         | 0.0          | 18.6         | 0            | 0.0          | 12.3         | 19.1                        |  |
| Upper                            | 0                                | 0.0          | 65.7         | 0             | 0.0          | 75.8         | 0         | 0.0          | 61.5         | 0            | 0.0          | 72.3         | 39.5                        |  |
| Unknown                          | 0                                | 0.0          | 2.8          | 0             | 0.0          | 3.8          | 1         | 100.0        | 3.1          | 135          | 100.0        | 5.8          | 0.0                         |  |
| <b>Total</b>                     | <b>0</b>                         | <b>0.0</b>   | <b>100.0</b> | <b>0</b>      | <b>0.0</b>   | <b>100.0</b> | <b>1</b>  | <b>100.0</b> | <b>100.0</b> | <b>135</b>   | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>                |  |
| <b>Total Home Mortgage Loans</b> |                                  |              |              |               |              |              |           |              |              |              |              |              |                             |  |
| Low                              | 0                                | 0.0          | 4.5          | 0             | 0.0          | 1.9          | 0         | 0.0          | 3.2          | 0            | 0.0          | 1.3          | 23.7                        |  |
| Moderate                         | 1                                | 10.0         | 13.9         | 261           | 2.3          | 8.5          | 0         | 0.0          | 13.2         | 0            | 0.0          | 8.0          | 17.8                        |  |
| Middle                           | 0                                | 0.0          | 20.0         | 0             | 0.0          | 16.2         | 1         | 10.0         | 19.4         | 410          | 6.7          | 15.4         | 19.1                        |  |
| Upper                            | 5                                | 50.0         | 43.7         | 6,770         | 60.3         | 56.5         | 6         | 60.0         | 40.6         | 4,572        | 75.1         | 52.0         | 39.5                        |  |
| Unknown                          | 4                                | 40.0         | 17.9         | 4,199         | 37.4         | 16.9         | 3         | 30.0         | 23.5         | 1,110        | 18.2         | 23.2         | 0.0                         |  |
| <b>Total</b>                     | <b>10</b>                        | <b>100.0</b> | <b>100.0</b> | <b>11,230</b> | <b>100.0</b> | <b>100.0</b> | <b>10</b> | <b>100.0</b> | <b>100.0</b> | <b>6,091</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>                |  |

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 D1-5B

| Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level |                                  |       |         |     |       |       |      |     |       |         |     |                                   |       |
|--|----------------------------------|-------|---------|-----|-------|-------|------|-----|-------|---------|-----|-----------------------------------|-------|
| Assessment Area: Dallas Fort Worth (DFW) Metropolitan                        |                                  |       |         |     |       |       |      |     |       |         |     |                                   |       |
| Borrower<br>Income<br>Level  | Bank And Aggregate Loans By Year |       |         |     |       |       |      |     |       |         |     | Families by<br>Family<br>Income % |       |
|  | 2022                             |       |         |     |       |       | 2023 |     |       |         |     |                                   |       |
|  | Bank                             | Agg   | Bank    | Agg |       |       | Bank | Agg | Bank  | Agg     |     |                                   |       |
| #  | #%                               | #%    | \$(000) | \$% | \$%   |       | #    | #%  | #%    | \$(000) | \$% | \$%                               |       |
| <b>Other Purpose LOC</b>   |                                  |       |         |     |       |       |      |     |       |         |     |                                   |       |
| <b>Low</b>   | 0                                | 0.0   | 4.7     | 0   | 0.0   | 2.7   | 0    | 0.0 | 6.7   | 0       | 0.0 | 4.1                               | 23.7  |
| <b>Moderate</b>  | 0                                | 0.0   | 8.0     | 0   | 0.0   | 4.6   | 0    | 0.0 | 10.9  | 0       | 0.0 | 5.9                               | 17.8  |
| <b>Middle</b>  | 0                                | 0.0   | 15.9    | 0   | 0.0   | 9.2   | 0    | 0.0 | 19.9  | 0       | 0.0 | 11.6                              | 19.1  |
| <b>Upper</b>   | 0                                | 0.0   | 66.6    | 0   | 0.0   | 78.8  | 0    | 0.0 | 60.2  | 0       | 0.0 | 73.7                              | 39.5  |
| <b>Unknown</b>   | 0                                | 0.0   | 4.9     | 0   | 0.0   | 4.6   | 0    | 0.0 | 2.3   | 0       | 0.0 | 4.8                               | 0.0   |
| <b>Total</b>   | 0                                | 0.0   | 100.0   | 0   | 0.0   | 100.0 | 0    | 0.0 | 100.0 | 0       | 0.0 | 100.0                             | 100.0 |
| <b>Other Purpose Closed/Exempt</b>   |                                  |       |         |     |       |       |      |     |       |         |     |                                   |       |
| <b>Low</b>   | 0                                | 0.0   | 8.0     | 0   | 0.0   | 3.5   | 0    | 0.0 | 6.7   | 0       | 0.0 | 3.0                               | 23.7  |
| <b>Moderate</b>  | 0                                | 0.0   | 13.7    | 0   | 0.0   | 5.8   | 0    | 0.0 | 16.4  | 0       | 0.0 | 8.7                               | 17.8  |
| <b>Middle</b>  | 0                                | 0.0   | 17.7    | 0   | 0.0   | 8.5   | 0    | 0.0 | 19.8  | 0       | 0.0 | 10.8                              | 19.1  |
| <b>Upper</b>   | 1                                | 100.0 | 53.9    | 700 | 100.0 | 70.1  | 0    | 0.0 | 46.5  | 0       | 0.0 | 59.0                              | 39.5  |
| <b>Unknown</b>   | 0                                | 0.0   | 6.7     | 0   | 0.0   | 12.1  | 0    | 0.0 | 10.6  | 0       | 0.0 | 18.4                              | 0.0   |
| <b>Total</b>   | 1                                | 100.0 | 100.0   | 700 | 100.0 | 100.0 | 0    | 0.0 | 100.0 | 0       | 0.0 | 100.0                             | 100.0 |
| <b>Purpose Not Applicable</b>  |                                  |       |         |     |       |       |      |     |       |         |     |                                   |       |
| <b>Low</b>   | 0                                | 0.0   | 0.8     | 0   | 0.0   | 0.4   | 0    | 0.0 | 2.0   | 0       | 0.0 | 1.6                               | 23.7  |
| <b>Moderate</b>  | 0                                | 0.0   | 0.5     | 0   | 0.0   | 0.3   | 0    | 0.0 | 1.3   | 0       | 0.0 | 1.5                               | 17.8  |
| <b>Middle</b>  | 0                                | 0.0   | 0.2     | 0   | 0.0   | 0.3   | 0    | 0.0 | 0.6   | 0       | 0.0 | 0.7                               | 19.1  |
| <b>Upper</b>   | 0                                | 0.0   | 0.3     | 0   | 0.0   | 0.9   | 0    | 0.0 | 0.0   | 0       | 0.0 | 0.0                               | 39.5  |
| <b>Unknown</b>   | 0                                | 0.0   | 98.1    | 0   | 0.0   | 98.1  | 0    | 0.0 | 96.1  | 0       | 0.0 | 96.1                              | 0.0   |
| <b>Total</b>   | 0                                | 0.0   | 100.0   | 0   | 0.0   | 100.0 | 0    | 0.0 | 100.0 | 0       | 0.0 | 100.0                             | 100.0 |

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 D1-6

| Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses<br>Assessment Area: Dallas Fort Worth (DFW) Metropolitan   |                                  |       |       |          |       |       |     |       |       |          |       |                    |  |
|---|----------------------------------|-------|-------|----------|-------|-------|-----|-------|-------|----------|-------|--------------------|--|
|   | Bank And Aggregate Loans By Year |       |       |          |       |       |     |       |       |          |       | Total Businesses % |  |
|   | 2022                             |       |       |          |       | 2023  |     |       |       |          |       |                    |  |
|   | Bank                             | Agg   | Bank  | Agg      |       | Bank  | Agg | Bank  | Agg   |          |       |                    |  |
|   | #                                | #%    | #%    | \$ (000) | \$ %  | \$ %  | #   | #%    | #%    | \$ (000) | \$ %  | \$ %               |  |
| <b>By Revenue</b>   |                                  |       |       |          |       |       |     |       |       |          |       |                    |  |
| <b>\$1 Million or Less</b>  | 28                               | 57.1  | 48.7  | 11,860   | 65.1  | 32.2  | 17  | 68.0  | 52.0  | 6,700    | 65.8  | 31.3               |  |
| <b>Over \$1 Million</b>   | 18                               | 36.7  |       | 5,351    | 29.4  |       | 7   | 28.0  |       | 3,112    | 30.6  |                    |  |
| <b>Revenue Unknown</b>  | 3                                | 6.1   |       | 1,012    | 5.6   |       | 1   | 4.0   |       | 370      | 3.6   |                    |  |
| <b>Total</b>  | 49                               | 100.0 |       | 18,223   | 100.0 |       | 25  | 100.0 |       | 10,182   | 100.0 |                    |  |
| <b>By Loan Size</b>   |                                  |       |       |          |       |       |     |       |       |          |       |                    |  |
| <b>\$100,000 or Less</b>  | 11                               | 22.4  | 94.2  | 784      | 4.3   | 40.0  | 4   | 16.0  | 94.5  | 312      | 3.1   | 42.1               |  |
| <b>\$100,001 - \$250,000</b>  | 11                               | 22.4  | 3.1   | 2,050    | 11.2  | 15.2  | 8   | 32.0  | 3.0   | 1,688    | 16.6  | 15.7               |  |
| <b>\$250,001 - \$1 Million</b>  | 27                               | 55.1  | 2.7   | 15,389   | 84.4  | 44.7  | 13  | 52.0  | 2.5   | 8,182    | 80.4  | 42.3               |  |
| <b>Total</b>  | 49                               | 100.0 | 100.0 | 18,223   | 100.0 | 100.0 | 25  | 100.0 | 100.0 | 10,182   | 100.0 | 100.0              |  |
| <b>By Loan Size and Revenues \$1 Million or Less</b>  |                                  |       |       |          |       |       |     |       |       |          |       |                    |  |
| <b>\$100,000 or Less</b>  | 6                                | 21.4  |       | 496      | 4.2   |       | 2   | 11.8  |       | 150      | 2.2   |                    |  |
| <b>\$100,001 - \$250,000</b>  | 7                                | 25.0  |       | 1,387    | 11.7  |       | 8   | 47.1  |       | 1,688    | 25.2  |                    |  |
| <b>\$250,001 - \$1 Million</b>  | 15                               | 53.6  |       | 9,977    | 84.1  |       | 7   | 41.2  |       | 4,862    | 72.6  |                    |  |
| <b>Total</b>  | 28                               | 100.0 |       | 11,860   | 100.0 |       | 17  | 100.0 |       | 6,700    | 100.0 |                    |  |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |       |       |          |       |       |     |       |       |          |       |                    |  |

## San Antonio Metropolitan AA

Table D2-1

| 2022 AA Combined Demographics<br>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   | 36                                 | 8.4            | 29,789                   | 6.2          | 9,653  | 32.4         | 109,096                   | 22.9         |
| Moderate  | 141                                | 32.9           | 144,512                  | 30.3         | 26,194   | 18.1         | 84,122                    | 17.6         |
| Middle  | 128                                | 29.9           | 146,249                  | 30.7         | 11,709   | 8.0          | 93,648                    | 19.6         |
| Upper   | 118                                | 27.6           | 154,974                  | 32.5         | 5,630  | 3.6          | 189,846                   | 39.8         |
| Unknown   | 5                                  | 1.2            | 1,188                    | 0.2          | 494  | 41.6         | 0                         | 0.0          |
| <b>Total AA</b>   | <b>428</b>                         | <b>100.0</b>   | <b>476,712</b>           | <b>100.0</b> | <b>53,680</b>                                      | <b>11.3</b>  | <b>476,712</b>            | <b>100.0</b> |
| Housing Units by Tract  | Housing Type by Tract              |                |                          |              |  |              |                           |              |
|   | Owner-occupied                     |                | Rental                   |              | Vacant   |              |                           |              |
| Low   | 54,419                             | 19,408         | 4.5                      | 35.7         | 29,124   | 53.5         | 5,887                     | 10.8         |
| Moderate  | 256,074                            | 116,669        | 26.9                     | 45.6         | 116,088  | 45.3         | 23,317                    | 9.1          |
| Middle  | 232,426                            | 139,966        | 32.2                     | 60.2         | 77,032   | 33.1         | 15,428                    | 6.6          |
| Upper   | 232,718                            | 157,174        | 36.2                     | 67.5         | 59,216   | 25.4         | 16,328                    | 7.0          |
| Unknown   | 1,649                              | 854            | 0.2                      | 51.8         | 715  | 43.4         | 80                        | 4.9          |
| <b>Total AA</b>   | <b>777,286</b>                     | <b>434,071</b> | <b>100.0</b>             | <b>55.8</b>  | <b>282,175</b>                                     | <b>36.3</b>  | <b>61,040</b>             | <b>7.9</b>   |
| Total Businesses by Tract   | Businesses by Tract & Revenue Size |                |                          |              |  |              |                           |              |
|   | Less Than or = \$1 Million         |                | Over \$1 Million         |              | Revenue Not Reported                               |              |                           |              |
| #   | %                                  | #              | %                        | #            | %  | #            | %                         |              |
| Low   | 5,471                              | 6.0            | 4,842                    | 5.7          | 587  | 10.9         | 42                        | 4.5          |
| Moderate  | 23,975                             | 26.1           | 22,146                   | 25.9         | 1,671  | 31.0         | 158                       | 16.9         |
| Middle  | 24,773                             | 27.0           | 23,191                   | 27.1         | 1,373  | 25.5         | 209                       | 22.4         |
| Upper   | 37,306                             | 40.6           | 35,076                   | 41.0         | 1,711  | 31.8         | 519                       | 55.6         |
| Unknown   | 310                                | 0.3            | 258                      | 0.3          | 46   | 0.9          | 6                         | 0.6          |
| <b>Total AA</b>   | <b>91,835</b>                      | <b>100.0</b>   | <b>85,513</b>            | <b>100.0</b> | <b>5,388</b>                                       | <b>100.0</b> | <b>934</b>                | <b>100.0</b> |
| Percentage of Total Businesses:   |                                    |                | 93.1                     |              |  | 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   | 14                                 | 1.3            | 14                       | 1.4          | 0  | 0.0          | 0                         | 0.0          |
| Moderate  | 172                                | 16.5           | 169                      | 16.4         | 3  | 30.0         | 0                         | 0.0          |
| Middle  | 331                                | 31.8           | 327                      | 31.8         | 3  | 30.0         | 1                         | 50.0         |
| Upper   | 519                                | 49.9           | 514                      | 50.0         | 4  | 40.0         | 1                         | 50.0         |
| Unknown   | 5                                  | 0.5            | 5                        | 0.5          | 0  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>   | <b>1,041</b>                       | <b>100.0</b>   | <b>1,029</b>             | <b>100.0</b> | <b>10</b>  | <b>100.0</b> | <b>2</b>                  | <b>100.0</b> |
| Percentage of Total Farms:  |                                    |                | 98.8                     |              |  | 1.0          |                           | 0.2          |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey |                                    |                |                          |              |  |              |                           |              |
| Note: Percentages may not total 100.0 percent due to rounding.  |                                    |                |                          |              |  |              |                           |              |

Table D2-2

| 2023 AA Combined Demographics<br>Assessment Area: San Antonio Metropolitan  |                              |                                    |                             |                  |   |                      |                              |           |
|---|------------------------------|------------------------------------|-----------------------------|------------------|---|----------------------|------------------------------|-----------|
| Income Categories   | Tract Distribution           |                                    | Families by Tract<br>Income |                  | Families < Poverty Level<br>as % of Families by Tract |                      | Families by Family<br>Income |           |
|   | #                            | %                                  | #                           | %                | #   | %                    | #                            | %         |
| Low   | 36                           | 8.4                                | 29,789                      | 6.2              | 9,653   | 32.4                 | 109,096                      | 22.9      |
| Moderate  | 141                          | 32.9                               | 144,512                     | 30.3             | 26,194  | 18.1                 | 84,122                       | 17.6      |
| Middle  | 128                          | 29.9                               | 146,249                     | 30.7             | 11,709  | 8.0                  | 93,648                       | 19.6      |
| Upper   | 118                          | 27.6                               | 154,974                     | 32.5             | 5,630   | 3.6                  | 189,846                      | 39.8      |
| Unknown   | 5                            | 1.2                                | 1,188                       | 0.2              | 494   | 41.6                 | 0                            | 0.0       |
| Total AA  | 428                          | 100.0                              | 476,712                     | 100.0            | 53,680  | 11.3                 | 476,712                      | 100.0     |
|   | Housing<br>Units by<br>Tract | Housing Type by Tract              |                             |                  |   |                      |                              |           |
|   |                              | Owner-occupied                     |                             | Rental           |   | Vacant               |                              |           |
| Low   | 54,419                       | #                                  | % by tract                  | % by unit        | #   | % by unit            | #                            | % by unit |
| Moderate  | 256,074                      | 19,408                             | 4.5                         | 35.7             | 29,124  | 53.5                 | 5,887                        | 10.8      |
| Middle  | 232,426                      | 116,669                            | 26.9                        | 45.6             | 116,088   | 45.3                 | 23,317                       | 9.1       |
| Upper   | 232,718                      | 139,966                            | 32.2                        | 60.2             | 77,032  | 33.1                 | 15,428                       | 6.6       |
| Unknown   | 1,649                        | 157,174                            | 36.2                        | 67.5             | 59,216  | 25.4                 | 16,328                       | 7.0       |
| Total AA  | 777,286                      | 434,071                            | 100.0                       | 55.8             | 282,175   | 36.3                 | 61,040                       | 7.9       |
|   | Total Businesses by<br>Tract | Businesses by Tract & Revenue Size |                             |                  |   |                      |                              |           |
|   |                              | Less Than or =<br>\$1 Million      |                             | Over \$1 Million |   | Revenue Not Reported |                              |           |
| Low   | 5,393                        | #                                  | %                           | #                | %   | #                    | %                            |           |
| Moderate  | 23,476                       | 6.1                                | 21,674                      | 26.2             | 1,654   | 30.9                 | 148                          | 17.5      |
| Middle  | 24,089                       | 26.4                               | 22,536                      | 27.2             | 1,363   | 25.5                 | 190                          | 22.4      |
| Upper   | 35,717                       | 27.1                               | 33,553                      | 40.5             | 1,704   | 31.9                 | 460                          | 54.3      |
| Unknown   | 301                          | 40.1                               | 248                         | 0.3              | 46  | 0.9                  | 7                            | 0.8       |
| Total AA  | 88,976                       | 100.0                              | 82,779                      | 100.0            | 5,350   | 100.0                | 847                          | 100.0     |
| Percentage of Total Businesses:   |                              | 93.0                               |                             | 6.0              |   | 1.0                  |                              |           |
|   | Total Farms by Tract         | Farms by Tract & Revenue Size      |                             |                  |   |                      |                              |           |
|   |                              | Less Than or =<br>\$1 Million      |                             | Over \$1 Million |   | Revenue Not Reported |                              |           |
| Low   | 14                           | #                                  | %                           | #                | %   | #                    | %                            |           |
| Moderate  | 160                          | 1.4                                | 14                          | 1.4              | 0   | 0.0                  | 0                            | 0.0       |
| Middle  | 321                          | 15.8                               | 157                         | 15.7             | 3   | 27.3                 | 0                            | 0.0       |
| Upper   | 512                          | 31.7                               | 317                         | 31.7             | 3   | 27.3                 | 1                            | 50.0      |
| Unknown   | 5                            | 50.6                               | 506                         | 50.7             | 5   | 45.5                 | 1                            | 50.0      |
| Total AA  | 1,012                        | 100.0                              | 999                         | 100.0            | 11  | 100.0                | 2                            | 100.0     |
| Percentage of Total Farms:  |                              | 98.7                               |                             | 1.1              |   | 0.2                  |                              |           |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                              |                                    |                             |                  |   |                      |                              |           |

Table D2-3A

| Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography<br>Assessment Area: San Antonio Metropolitan |                                  |       |         |       |       |       |     |         |       |       |                              |       |
|---|----------------------------------|-------|---------|-------|-------|-------|-----|---------|-------|-------|------------------------------|-------|
| Geographic<br>Income<br>Level   | Bank And Aggregate Loans By Year |       |         |       |       |       |     |         |       |       | Owner<br>Occupied Units<br>% |       |
|   | 2022                             |       |         |       |       | 2023  |     |         |       |       |                              |       |
|   | Bank                             | Agg   | Bank    | Agg   |       | Bank  | Agg | Bank    | Agg   |       |                              |       |
| #   | #%                               | #%    | \$(000) | \$%   | \$%   | #     | #%  | \$(000) | \$%   | \$%   |                              |       |
| <b>Home Purchase Loans</b>  |                                  |       |         |       |       |       |     |         |       |       |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 2.0     | 0     | 0.0   | 1.3   | 0   | 0.0     | 1.9   | 0     | 0.0                          | 1.2   |
| <b>Moderate</b>   | 0                                | 0.0   | 16.1    | 0     | 0.0   | 11.5  | 0   | 0.0     | 18.2  | 0     | 0.0                          | 13.1  |
| <b>Middle</b>   | 0                                | 0.0   | 37.0    | 0     | 0.0   | 31.7  | 0   | 0.0     | 35.8  | 0     | 0.0                          | 31.4  |
| <b>Upper</b>  | 2                                | 100.0 | 44.4    | 1,319 | 100.0 | 55.0  | 1   | 100.0   | 43.6  | 192   | 100.0                        | 53.8  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.5     | 0     | 0.0   | 0.5   | 0   | 0.0     | 0.5   | 0     | 0.0                          | 0.5   |
| <b>Total</b>  | 2                                | 100.0 | 100.0   | 1,319 | 100.0 | 100.0 | 1   | 100.0   | 100.0 | 192   | 100.0                        | 100.0 |
| <b>Refinance Loans</b>  |                                  |       |         |       |       |       |     |         |       |       |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 2.2     | 0     | 0.0   | 1.3   | 0   | 0.0     | 3.3   | 0     | 0.0                          | 2.7   |
| <b>Moderate</b>   | 1                                | 33.3  | 18.4    | 300   | 25.4  | 12.7  | 0   | 0.0     | 23.0  | 0     | 0.0                          | 17.4  |
| <b>Middle</b>   | 0                                | 0.0   | 34.4    | 0     | 0.0   | 29.5  | 0   | 0.0     | 34.1  | 0     | 0.0                          | 30.0  |
| <b>Upper</b>  | 2                                | 66.7  | 44.7    | 879   | 74.6  | 56.2  | 1   | 100.0   | 39.3  | 1,120 | 100.0                        | 49.7  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.3     | 0     | 0.0   | 0.3   | 0   | 0.0     | 0.3   | 0     | 0.0                          | 0.3   |
| <b>Total</b>  | 3                                | 100.0 | 100.0   | 1,179 | 100.0 | 100.0 | 1   | 100.0   | 100.0 | 1,120 | 100.0                        | 100.0 |
| <b>Home Improvement Loans</b>   |                                  |       |         |       |       |       |     |         |       |       |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 2.4     | 0     | 0.0   | 1.6   | 0   | 0.0     | 2.0   | 0     | 0.0                          | 2.0   |
| <b>Moderate</b>   | 0                                | 0.0   | 16.0    | 0     | 0.0   | 12.9  | 0   | 0.0     | 18.8  | 0     | 0.0                          | 15.4  |
| <b>Middle</b>   | 0                                | 0.0   | 26.6    | 0     | 0.0   | 21.0  | 0   | 0.0     | 25.9  | 0     | 0.0                          | 21.1  |
| <b>Upper</b>  | 0                                | 0.0   | 54.9    | 0     | 0.0   | 64.3  | 0   | 0.0     | 53.0  | 0     | 0.0                          | 61.3  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.1     | 0     | 0.0   | 0.1   | 0   | 0.0     | 0.2   | 0     | 0.0                          | 0.3   |
| <b>Total</b>  | 0                                | 0.0   | 100.0   | 0     | 0.0   | 100.0 | 0   | 0.0     | 100.0 | 0     | 0.0                          | 100.0 |
| <b>Multifamily Loans</b>  |                                  |       |         |       |       |       |     |         |       |       |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 7.4     | 0     | 0.0   | 5.2   | 0   | 0.0     | 9.3   | 0     | 0.0                          | 11.8  |
| <b>Moderate</b>   | 0                                | 0.0   | 44.9    | 0     | 0.0   | 36.4  | 0   | 0.0     | 47.7  | 0     | 0.0                          | 29.5  |
| <b>Middle</b>   | 0                                | 0.0   | 30.7    | 0     | 0.0   | 32.5  | 0   | 0.0     | 22.1  | 0     | 0.0                          | 23.2  |
| <b>Upper</b>  | 0                                | 0.0   | 17.0    | 0     | 0.0   | 26.0  | 0   | 0.0     | 19.8  | 0     | 0.0                          | 35.4  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.0     | 0     | 0.0   | 0.0   | 0   | 0.0     | 1.2   | 0     | 0.0                          | 0.0   |
| <b>Total</b>  | 0                                | 0.0   | 100.0   | 0     | 0.0   | 100.0 | 0   | 0.0     | 100.0 | 0     | 0.0                          | 100.0 |
| <b>Total Home Mortgage Loans</b>  |                                  |       |         |       |       |       |     |         |       |       |                              |       |
| <b>Low</b>  | 0                                | 0.0   | 2.1     | 0     | 0.0   | 1.8   | 0   | 0.0     | 2.1   | 0     | 0.0                          | 2.0   |
| <b>Moderate</b>   | 1                                | 20.0  | 16.9    | 300   | 12.0  | 14.6  | 0   | 0.0     | 19.0  | 0     | 0.0                          | 14.6  |
| <b>Middle</b>   | 0                                | 0.0   | 36.0    | 0     | 0.0   | 31.2  | 0   | 0.0     | 35.0  | 0     | 0.0                          | 30.6  |
| <b>Upper</b>  | 4                                | 80.0  | 44.6    | 2,198 | 88.0  | 52.0  | 4   | 100.0   | 43.4  | 1,931 | 100.0                        | 52.4  |
| <b>Unknown</b>  | 0                                | 0.0   | 0.4     | 0     | 0.0   | 0.4   | 0   | 0.0     | 0.5   | 0     | 0.0                          | 0.5   |
| <b>Total</b>  | 5                                | 100.0 | 100.0   | 2,498 | 100.0 | 100.0 | 4   | 100.0   | 100.0 | 1,931 | 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 D2-3B

| Distribution of 2022 and 2023 Home Mortgage Lending By Income Level of Geography<br>Assessment Area: San Antonio Metropolitan                               |                                  |     |         |     |     |       |     |       |         |     |       |                              |       |
|---|----------------------------------|-----|---------|-----|-----|-------|-----|-------|---------|-----|-------|------------------------------|-------|
| Geographic<br>Income<br>Level   | Bank And Aggregate Loans By Year |     |         |     |     |       |     |       |         |     |       | Owner<br>Occupied<br>Units % |       |
|   | 2022                             |     |         |     |     | 2023  |     |       |         |     |       |                              |       |
|   | Bank                             | Agg | Bank    | Agg |     | Bank  | Agg | Bank  | Agg     |     |       |                              |       |
| #   | #%                               | #%  | \$(000) | \$% | \$% | #     | #%  | #%    | \$(000) | \$% | \$%   |                              |       |
| <b>Other Purpose LOC</b>  |                                  |     |         |     |     |       |     |       |         |     |       |                              |       |
| <b>Low</b>  | 0                                | 0.0 | 0.9     | 0   | 0.0 | 0.5   | 0   | 0.0   | 1.4     | 0   | 0.0   | 1.0                          | 4.5   |
| <b>Moderate</b>   | 0                                | 0.0 | 10.8    | 0   | 0.0 | 8.7   | 0   | 0.0   | 14.9    | 0   | 0.0   | 11.7                         | 26.9  |
| <b>Middle</b>   | 0                                | 0.0 | 24.3    | 0   | 0.0 | 18.6  | 0   | 0.0   | 24.4    | 0   | 0.0   | 20.3                         | 32.2  |
| <b>Upper</b>  | 0                                | 0.0 | 63.7    | 0   | 0.0 | 71.8  | 0   | 0.0   | 59.2    | 0   | 0.0   | 67.0                         | 36.2  |
| <b>Unknown</b>  | 0                                | 0.0 | 0.3     | 0   | 0.0 | 0.5   | 0   | 0.0   | 0.0     | 0   | 0.0   | 0.0                          | 0.2   |
| <b>Tract-Unk</b>  | 0                                | 0.0 | 0.0     | 0   | 0.0 | 0.0   | 0   | 0.0   | 0.0     | 0   | 0.0   | 0.0                          |       |
| <b>Total</b>  | 0                                | 0.0 | 100.0   | 0   | 0.0 | 100.0 | 0   | 0.0   | 100.0   | 0   | 0.0   | 100.0                        | 100.0 |
| <b>Other Purpose Closed/Exempt</b>  |                                  |     |         |     |     |       |     |       |         |     |       |                              |       |
| <b>Low</b>  | 0                                | 0.0 | 2.3     | 0   | 0.0 | 1.5   | 0   | 0.0   | 3.6     | 0   | 0.0   | 2.9                          | 4.5   |
| <b>Moderate</b>   | 0                                | 0.0 | 21.3    | 0   | 0.0 | 14.4  | 0   | 0.0   | 21.0    | 0   | 0.0   | 19.0                         | 26.9  |
| <b>Middle</b>   | 0                                | 0.0 | 28.8    | 0   | 0.0 | 23.2  | 0   | 0.0   | 26.2    | 0   | 0.0   | 23.9                         | 32.2  |
| <b>Upper</b>  | 0                                | 0.0 | 47.1    | 0   | 0.0 | 60.4  | 2   | 100.0 | 49.1    | 619 | 100.1 | 54.2                         | 36.2  |
| <b>Unknown</b>  | 0                                | 0.0 | 0.5     | 0   | 0.0 | 0.5   | 0   | 0.0   | 0.1     | 0   | 0.0   | 0.0                          | 0.2   |
| <b>Tract-Unk</b>  | 0                                | 0.0 | 0.0     | 0   | 0.0 | 0.0   | 0   | 0.0   | 0.0     | 0   | 0.0   | 0.0                          |       |
| <b>Total</b>  | 0                                | 0.0 | 100.0   | 0   | 0.0 | 100.0 | 2   | 100.0 | 100.0   | 618 | 100.0 | 100.0                        | 100.0 |
| <b>Purpose Not Applicable</b>   |                                  |     |         |     |     |       |     |       |         |     |       |                              |       |
| <b>Low</b>  | 0                                | 0.0 | 3.4     | 0   | 0.0 | 3.6   | 0   | 0.0   | 3.4     | 0   | 0.0   | 1.7                          | 4.5   |
| <b>Moderate</b>   | 0                                | 0.0 | 28.3    | 0   | 0.0 | 22.9  | 0   | 0.0   | 32.4    | 0   | 0.0   | 26.6                         | 26.9  |
| <b>Middle</b>   | 0                                | 0.0 | 47.9    | 0   | 0.0 | 40.8  | 0   | 0.0   | 41.2    | 0   | 0.0   | 39.2                         | 32.2  |
| <b>Upper</b>  | 0                                | 0.0 | 20.2    | 0   | 0.0 | 32.6  | 0   | 0.0   | 22.8    | 0   | 0.0   | 31.4                         | 36.2  |
| <b>Unknown</b>  | 0                                | 0.0 | 0.1     | 0   | 0.0 | 0.1   | 0   | 0.0   | 0.2     | 0   | 0.0   | 1.1                          | 0.2   |
| <b>Tract-Unk</b>  | 0                                | 0.0 | 0.0     | 0   | 0.0 | 0.0   | 0   | 0.0   | 0.0     | 0   | 0.0   | 0.0                          |       |
| <b>Total</b>  | 0                                | 0.0 | 100.0   | 0   | 0.0 | 100.0 | 0   | 0.0   | 100.0   | 0   | 0.0   | 100.0                        | 100.0 |
| Source: 2023 FFIEC Census Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                  |     |         |     |     |       |     |       |         |     |       |                              |       |

Table D2-4

| Distribution of 2022 and 2023 Small Business Lending By Income Level of Geography<br>Assessment Area: San Antonio Metropolitan |                                  |              |              |               |              |              |           |              |              |               |              |                          |  |
|--|----------------------------------|--------------|--------------|---------------|--------------|--------------|-----------|--------------|--------------|---------------|--------------|--------------------------|--|
| Geographic<br>Income<br>Level  | Bank And Aggregate Loans By Year |              |              |               |              |              |           |              |              |               |              | Total<br>Businesses<br>% |  |
|  | 2022                             |              |              |               |              |              | 2023      |              |              |               |              |                          |  |
|  | Bank                             | Agg          | Bank         | Agg           | Bank         | Agg          | Bank      | Agg          | Bank         | Agg           | Bank         |                          |  |
| #  | #%                               | #%           | \$ (000)     | \$ %          | #            | #%           | #%        | \$ (000)     | \$ %         | #             | \$ %         | # %                      |  |
| Low  | 1                                | 2.0          | 5.4          | 57            | 0.4          | 8.0          | 1         | 2.9          | 5.2          | 250           | 2.5          | 7.5                      |  |
| Moderate   | 8                                | 16.3         | 23.0         | 2,894         | 18.1         | 24.3         | 4         | 11.8         | 22.7         | 1,035         | 10.3         | 23.1                     |  |
| Middle   | 6                                | 12.2         | 25.8         | 1,850         | 11.6         | 23.4         | 5         | 14.7         | 25.5         | 1,133         | 11.3         | 23.3                     |  |
| Upper  | 34                               | 69.4         | 45.0         | 11,182        | 70.0         | 43.4         | 24        | 70.6         | 46.0         | 7,609         | 75.9         | 45.5                     |  |
| Unknown  | 0                                | 0.0          | 0.4          | 0             | 0.0          | 0.7          | 0         | 0.0          | 0.4          | 0             | 0.0          | 0.5                      |  |
| <b>Total</b>   | <b>49</b>                        | <b>100.0</b> | <b>100.0</b> | <b>15,983</b> | <b>100.0</b> | <b>100.0</b> | <b>34</b> | <b>100.0</b> | <b>100.0</b> | <b>10,027</b> | <b>100.0</b> | <b>100.0</b>             |  |

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 D2-5

| Distribution of 2022 and 2023 Small Farm Lending By Income Level of Geography<br>Assessment Area: San Antonio Metropolitan |                                  |              |              |            |              |              |          |              |              |            |              |                  |  |
|--|----------------------------------|--------------|--------------|------------|--------------|--------------|----------|--------------|--------------|------------|--------------|------------------|--|
| Geographic<br>Income<br>Level  | Bank And Aggregate Loans By Year |              |              |            |              |              |          |              |              |            |              | Total<br>Farms % |  |
|  | 2022                             |              |              |            |              |              | 2023     |              |              |            |              |                  |  |
|  | Bank                             | Agg          | Bank         | Agg        | Bank         | Agg          | Bank     | Agg          | Bank         | Agg        | Bank         |                  |  |
| #  | #%                               | #%           | \$ (000)     | \$ %       | #            | #%           | #%       | \$ (000)     | \$ %         | #          | \$ %         | # %              |  |
| Low  | 0                                | 0.0          | 1.7          | 0          | 0.0          | 0.7          | 0        | 0.0          | 0.8          | 0          | 0.0          | 0.2              |  |
| Moderate   | 0                                | 0.0          | 11.2         | 0          | 0.0          | 10.7         | 0        | 0.0          | 10.6         | 0          | 0.0          | 7.4              |  |
| Middle   | 2                                | 50.0         | 43.3         | 235        | 81.3         | 47.5         | 1        | 50.0         | 37.3         | 75         | 75.0         | 50.9             |  |
| Upper  | 2                                | 50.0         | 42.5         | 54         | 18.7         | 40.8         | 1        | 50.0         | 50.8         | 25         | 25.0         | 41.4             |  |
| Unknown  | 0                                | 0.0          | 0.4          | 0          | 0.0          | 0.1          | 0        | 0.0          | 0.4          | 0          | 0.0          | 0.2              |  |
| <b>Total</b>   | <b>4</b>                         | <b>100.0</b> | <b>100.0</b> | <b>289</b> | <b>100.0</b> | <b>100.0</b> | <b>2</b> | <b>100.0</b> | <b>100.0</b> | <b>100</b> | <b>100.0</b> | <b>100.0</b>     |  |

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 D2-6A

| Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level |                                  |       |         |       |       |       |      |       |       |       |       |                             |       |  |
|--|----------------------------------|-------|---------|-------|-------|-------|------|-------|-------|-------|-------|-----------------------------|-------|--|
| Assessment Area: San Antonio Metropolitan                                    |                                  |       |         |       |       |       |      |       |       |       |       |                             |       |  |
| Borrower Income Level  | Bank And Aggregate Loans By Year |       |         |       |       |       |      |       |       |       |       | Families by Family Income % |       |  |
|  | 2022                             |       |         |       |       |       | 2023 |       |       |       |       |                             |       |  |
|  | Bank                             | Agg   | Bank    | Agg   |       |       | Bank | Agg   | Bank  | Agg   |       |                             |       |  |
| #  | #%                               | #%    | \$(000) | \$%   | \$%   |       | #    | #%    | #%    | \$000 | \$%   | \$%                         |       |  |
| Home Purchase Loans  |                                  |       |         |       |       |       |      |       |       |       |       |                             |       |  |
| Low  | 0                                | 0.0   | 2.1     | 0     | 0.0   | 1.0   | 0    | 0.0   | 1.9   | 0     | 0.0   | 0.9                         | 22.9  |  |
| Moderate   | 0                                | 0.0   | 14.8    | 0     | 0.0   | 10.3  | 0    | 0.0   | 14.1  | 0     | 0.0   | 10.0                        | 17.6  |  |
| Middle   | 0                                | 0.0   | 22.9    | 0     | 0.0   | 20.4  | 0    | 0.0   | 21.4  | 0     | 0.0   | 19.0                        | 19.6  |  |
| Upper  | 1                                | 50.0  | 37.3    | 1,000 | 75.8  | 45.7  | 1    | 100.0 | 32.4  | 192   | 100.0 | 40.9                        | 39.8  |  |
| Unknown  | 1                                | 50.0  | 22.8    | 319   | 24.2  | 22.6  | 0    | 0.0   | 30.1  | 0     | 0.0   | 29.1                        | 0.0   |  |
| Total  | 2                                | 100.0 | 100.0   | 1,319 | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 192   | 100.0 | 100.0                       | 100.0 |  |
| Refinance Loans  |                                  |       |         |       |       |       |      |       |       |       |       |                             |       |  |
| Low  | 0                                | 0.0   | 6.5     | 0     | 0.0   | 3.4   | 0    | 0.0   | 7.5   | 0     | 0.0   | 3.8                         | 22.9  |  |
| Moderate   | 0                                | 0.0   | 18.3    | 0     | 0.0   | 12.9  | 0    | 0.0   | 17.1  | 0     | 0.0   | 11.1                        | 17.6  |  |
| Middle   | 0                                | 0.0   | 21.3    | 0     | 0.0   | 18.4  | 0    | 0.0   | 22.1  | 0     | 0.0   | 18.0                        | 19.6  |  |
| Upper  | 3                                | 100.0 | 37.1    | 1,179 | 100.0 | 47.7  | 1    | 100.0 | 37.5  | 1,120 | 100.0 | 46.8                        | 39.8  |  |
| Unknown  | 0                                | 0.0   | 16.7    | 0     | 0.0   | 17.5  | 0    | 0.0   | 15.8  | 0     | 0.0   | 20.3                        | 0.0   |  |
| Total  | 3                                | 100.0 | 100.0   | 1,179 | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 1,120 | 100.0 | 100.0                       | 100.0 |  |
| Home Improvement Loans   |                                  |       |         |       |       |       |      |       |       |       |       |                             |       |  |
| Low  | 0                                | 0.0   | 6.2     | 0     | 0.0   | 3.4   | 0    | 0.0   | 8.3   | 0     | 0.0   | 4.9                         | 22.9  |  |
| Moderate   | 0                                | 0.0   | 15.4    | 0     | 0.0   | 10.7  | 0    | 0.0   | 15.1  | 0     | 0.0   | 11.1                        | 17.6  |  |
| Middle   | 0                                | 0.0   | 20.0    | 0     | 0.0   | 15.3  | 0    | 0.0   | 20.8  | 0     | 0.0   | 16.0                        | 19.6  |  |
| Upper  | 0                                | 0.0   | 55.0    | 0     | 0.0   | 67.3  | 0    | 0.0   | 53.4  | 0     | 0.0   | 63.9                        | 39.8  |  |
| Unknown  | 0                                | 0.0   | 3.5     | 0     | 0.0   | 3.3   | 0    | 0.0   | 2.4   | 0     | 0.0   | 4.1                         | 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 |  |
| Total Home Mortgage Loans  |                                  |       |         |       |       |       |      |       |       |       |       |                             |       |  |
| Low  | 0                                | 0.0   | 3.4     | 0     | 0.0   | 1.5   | 0    | 0.0   | 3.0   | 0     | 0.0   | 1.2                         | 22.9  |  |
| Moderate   | 0                                | 0.0   | 15.4    | 0     | 0.0   | 10.7  | 1    | 25.0  | 14.5  | 259   | 13.4  | 10.1                        | 17.6  |  |
| Middle   | 0                                | 0.0   | 22.0    | 0     | 0.0   | 19.8  | 0    | 0.0   | 21.4  | 0     | 0.0   | 18.8                        | 19.6  |  |
| Upper  | 4                                | 80.0  | 37.7    | 2,179 | 87.2  | 46.3  | 3    | 75.0  | 33.9  | 1,672 | 86.6  | 41.7                        | 39.8  |  |
| Unknown  | 1                                | 20.0  | 21.5    | 319   | 12.8  | 21.7  | 0    | 0.0   | 27.2  | 0     | 0.0   | 28.1                        | 0.0   |  |
| Total  | 5                                | 100.0 | 100.0   | 2,498 | 100.0 | 100.0 | 4    | 100.0 | 100.0 | 1,931 | 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 D2-6B

| Distribution of 2022 and 2023 Home Mortgage Lending By Borrower Income Level |                                  |     |          |      |      |       |      |       |       |          |       |       |                                   |  |
|--|----------------------------------|-----|----------|------|------|-------|------|-------|-------|----------|-------|-------|-----------------------------------|--|
| Assessment Area: San Antonio Metropolitan                                    |                                  |     |          |      |      |       |      |       |       |          |       |       |                                   |  |
| Borrower<br>Income<br>Level  | Bank And Aggregate Loans By Year |     |          |      |      |       |      |       |       |          |       |       | Families<br>by Family<br>Income % |  |
|  | 2022                             |     |          |      |      |       | 2023 |       |       |          |       |       |                                   |  |
|  | Bank                             | Agg | Bank     | Agg  |      |       | Bank | Agg   | Bank  | Agg      |       |       |                                   |  |
| #  | #%                               | #%  | \$ (000) | \$ % | \$ % |       | #    | #%    | #%    | \$ (000) | \$ %  | \$ %  |                                   |  |
| <b>Other Purpose LOC</b>   |                                  |     |          |      |      |       |      |       |       |          |       |       |                                   |  |
| <b>Low</b>   | 0                                | 0.0 | 7.0      | 0    | 0.0  | 6.0   | 0    | 0.0   | 7.2   | 0        | 0.0   | 6.6   | 22.9                              |  |
| <b>Moderate</b>  | 0                                | 0.0 | 13.8     | 0    | 0.0  | 9.7   | 0    | 0.0   | 16.2  | 0        | 0.0   | 11.6  | 17.6                              |  |
| <b>Middle</b>  | 0                                | 0.0 | 18.4     | 0    | 0.0  | 12.6  | 0    | 0.0   | 22.0  | 0        | 0.0   | 16.2  | 19.6                              |  |
| <b>Upper</b>   | 0                                | 0.0 | 56.2     | 0    | 0.0  | 67.1  | 0    | 0.0   | 53.9  | 0        | 0.0   | 65.1  | 39.8                              |  |
| <b>Unknown</b>   | 0                                | 0.0 | 4.6      | 0    | 0.0  | 4.5   | 0    | 0.0   | 0.8   | 0        | 0.0   | 0.5   | 0.0                               |  |
| <b>Total</b>   | 0                                | 0.0 | 100.0    | 0    | 0.0  | 100.0 | 0    | 0.0   | 100.0 | 0        | 0.0   | 100.0 | 100.0                             |  |
| <b>Other Purpose Closed/Exempt</b>   |                                  |     |          |      |      |       |      |       |       |          |       |       |                                   |  |
| <b>Low</b>   | 0                                | 0.0 | 9.3      | 0    | 0.0  | 4.9   | 0    | 0.0   | 8.5   | 0        | 0.0   | 5.9   | 22.9                              |  |
| <b>Moderate</b>  | 0                                | 0.0 | 18.1     | 0    | 0.0  | 11.7  | 1    | 50.0  | 17.4  | 259      | 41.8  | 12.1  | 17.6                              |  |
| <b>Middle</b>  | 0                                | 0.0 | 20.0     | 0    | 0.0  | 14.3  | 0    | 0.0   | 24.3  | 0        | 0.0   | 18.3  | 19.6                              |  |
| <b>Upper</b>   | 0                                | 0.0 | 48.7     | 0    | 0.0  | 63.9  | 1    | 50.0  | 43.8  | 360      | 58.3  | 53.5  | 39.8                              |  |
| <b>Unknown</b>   | 0                                | 0.0 | 3.9      | 0    | 0.0  | 5.2   | 0    | 0.0   | 6.0   | 0        | 0.0   | 10.2  | 0.0                               |  |
| <b>Total</b>   | 0                                | 0.0 | 100.0    | 0    | 0.0  | 100.0 | 2    | 100.0 | 100.0 | 618      | 100.0 | 100.0 | 100.0                             |  |
| <b>Purpose Not Applicable</b>  |                                  |     |          |      |      |       |      |       |       |          |       |       |                                   |  |
| <b>Low</b>   | 0                                | 0.0 | 2.0      | 0    | 0.0  | 1.1   | 0    | 0.0   | 2.2   | 0        | 0.0   | 1.5   | 22.9                              |  |
| <b>Moderate</b>  | 0                                | 0.0 | 1.0      | 0    | 0.0  | 1.0   | 0    | 0.0   | 1.6   | 0        | 0.0   | 1.0   | 17.6                              |  |
| <b>Middle</b>  | 0                                | 0.0 | 0.1      | 0    | 0.0  | 0.1   | 0    | 0.0   | 0.2   | 0        | 0.0   | 0.3   | 19.6                              |  |
| <b>Upper</b>   | 0                                | 0.0 | 0.1      | 0    | 0.0  | 0.2   | 0    | 0.0   | 0.2   | 0        | 0.0   | 0.1   | 39.8                              |  |
| <b>Unknown</b>   | 0                                | 0.0 | 96.8     | 0    | 0.0  | 97.6  | 0    | 0.0   | 95.7  | 0        | 0.0   | 97.1  | 0.0                               |  |
| <b>Total</b>   | 0                                | 0.0 | 100.0    | 0    | 0.0  | 100.0 | 0    | 0.0   | 100.0 | 0        | 0.0   | 100.0 | 100.0                             |  |
| 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 D2-7

|   | Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses<br>Assessment Area: San Antonio Metropolitan |       |       |        |       |           |     |    |       |           |        |       | Total Businesses % |       |
|---|---|-------|-------|--------|-------|-----------|-----|----|-------|-----------|--------|-------|--------------------|-------|
|   | Bank And Aggregate Loans By Year  |       |       |        |       |           |     |    |       |           |        |       |                    |       |
|   | 2022  |       |       |        | 2023  |           |     |    |       |           |        |       |                    |       |
|   | Bank  |       | Agg   |        | Bank  |           | Agg |    | Bank  |           | Agg    |       |                    |       |
| #   |   | #%    |       | #%     |       | \$(\$000) |     | #% |       | \$(\$000) |        | #%    |                    |       |
| <b>By Revenue</b>   |   |       |       |        |       |           |     |    |       |           |        |       |                    |       |
| <b>\$1 Million or Less</b>  | 24  | 49.0  | 46.4  | 6,190  | 38.7  | 29.1      |     | 13 | 38.2  | 49.8      | 2,416  | 24.1  | 29.2               | 93.0  |
| <b>Over \$1 Million</b>   | 18  | 36.7  |       | 7,889  | 49.4  |           |     | 12 | 35.3  |           | 5,635  | 56.2  |                    | 6.0   |
| <b>Revenue Unknown</b>  | 7   | 14.3  |       | 1,904  | 11.9  |           |     | 9  | 26.5  |           | 1,976  | 19.7  |                    | 1.0   |
| <b>Total</b>  | 49  | 100.0 |       | 15,983 | 100.0 |           |     | 34 | 100.0 |           | 10,027 | 100.0 |                    | 100.0 |
| <b>By Loan Size</b>   |   |       |       |        |       |           |     |    |       |           |        |       |                    |       |
| <b>\$100,000 or Less</b>  | 13  | 26.5  | 93.3  | 713    | 4.5   | 35.5      |     | 10 | 29.4  | 93.7      | 623    | 6.2   | 37.0               |       |
| <b>\$100,001 - \$250,000</b>  | 11  | 22.4  | 3.5   | 2,147  | 13.4  | 16.2      |     | 8  | 23.5  | 3.3       | 1,594  | 15.9  | 16.1               |       |
| <b>\$250,001 - \$1 Million</b>  | 25  | 51.0  | 3.3   | 13,123 | 82.1  | 48.4      |     | 16 | 47.1  | 3.0       | 7,810  | 77.9  | 46.9               |       |
| <b>Total</b>  | 49  | 100.0 | 100.0 | 15,983 | 100.0 | 100.0     |     | 34 | 100.0 | 100.0     | 10,027 | 100.0 | 100.0              |       |
| <b>By Loan Size and Revenues \$1 Million or Less</b>  |   |       |       |        |       |           |     |    |       |           |        |       |                    |       |
| <b>\$100,000 or Less</b>  | 6   | 25.0  |       | 383    | 6.2   |           |     | 5  | 38.5  |           | 330    | 13.7  |                    |       |
| <b>\$100,001 - \$250,000</b>  | 9   | 37.5  |       | 1,722  | 27.8  |           |     | 6  | 46.2  |           | 1,211  | 50.1  |                    |       |
| <b>\$250,001 - \$1 Million</b>  | 9   | 37.5  |       | 4,085  | 66.0  |           |     | 2  | 15.4  |           | 875    | 36.2  |                    |       |
| <b>Total</b>  | 24  | 100.0 |       | 6,190  | 100.0 |           |     | 13 | 100.0 |           | 2,416  | 100.0 |                    |       |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |   |       |       |        |       |           |     |    |       |           |        |       |                    |       |

Table D2-8

|   | Distribution of 2022 and 2023 Small Farm Lending By Revenue Size of Farms<br>Assessment Area: San Antonio Metropolitan |       |       |     |       |           |     |    |       |           |     |       | Total Farms % |       |
|---|--|-------|-------|-----|-------|-----------|-----|----|-------|-----------|-----|-------|---------------|-------|
|   | Bank And Aggregate Loans By Year   |       |       |     |       |           |     |    |       |           |     |       |               |       |
|   | 2022   |       |       |     | 2023  |           |     |    |       |           |     |       |               |       |
|   | Bank   |       | Agg   |     | Bank  |           | Agg |    | Bank  |           | Agg |       |               |       |
| #   |  | #%    |       | #%  |       | \$(\$000) |     | #% |       | \$(\$000) |     | #%    |               |       |
| <b>By Revenue</b>   |  |       |       |     |       |           |     |    |       |           |     |       |               |       |
| <b>\$1 Million or Less</b>  | 3  | 75.0  | 62.7  | 251 | 86.9  | 61.7      |     | 1  | 50.0  | 60.2      | 75  | 75.0  | 68.8          | 98.7  |
| <b>Over \$1 Million</b>   | 0  | 0.0   |       | 0   | 0.0   |           |     | 0  | 0.0   |           | 0   | 0.0   |               | 1.1   |
| <b>Revenue Unknown</b>  | 1  | 25.0  |       | 38  | 13.1  |           |     | 1  | 50.0  |           | 25  | 25.0  |               | 0.2   |
| <b>Total</b>  | 4  | 100.0 |       | 289 | 100.0 |           |     | 2  | 100.0 |           | 100 | 100.0 |               | 100.0 |
| <b>By Loan Size</b>   |  |       |       |     |       |           |     |    |       |           |     |       |               |       |
| <b>\$100,000 or Less</b>  | 3  | 75.0  | 88.8  | 129 | 44.6  | 28.5      |     | 2  | 100.0 | 92.4      | 100 | 100.0 | 40.6          |       |
| <b>\$100,001 - \$250,000</b>  | 1  | 25.0  | 5.6   | 160 | 55.4  | 23.0      |     | 0  | 0.0   | 4.2       | 0   | 0.0   | 20.7          |       |
| <b>\$250,001 - \$500,000</b>  | 0  | 0.0   | 5.6   | 0   | 0.0   | 48.6      |     | 0  | 0.0   | 3.4       | 0   | 0.0   | 38.8          |       |
| <b>Total</b>  | 4  | 100.0 | 100.0 | 289 | 100.0 | 100.0     |     | 2  | 100.0 | 100.0     | 100 | 100.0 | 100.0         |       |
| <b>By Loan Size and Revenues \$1 Million or Less</b>  |  |       |       |     |       |           |     |    |       |           |     |       |               |       |
| <b>\$100,000 or Less</b>  | 2  | 66.7  |       | 91  | 36.3  |           |     | 1  | 100.0 |           | 75  | 100.0 |               |       |
| <b>\$100,001 - \$250,000</b>  | 1  | 33.3  |       | 160 | 63.7  |           |     | 0  | 0.0   |           | 0   | 0.0   |               |       |
| <b>\$250,001 - \$500,000</b>  | 0  | 0.0   |       | 0   | 0.0   |           |     | 0  | 0.0   |           | 0   | 0.0   |               |       |
| <b>Total</b>  | 3  | 100.0 |       | 251 | 100.0 |           |     | 1  | 100.0 |           | 75  | 100.0 |               |       |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |  |       |       |     |       |           |     |    |       |           |     |       |               |       |

## APPENDIX E – DEMOGRAPHIC DATA AND LENDING TABLES OF NONMETROPOLITAN LIMITED-SCOPE ASSESSMENT AREAS

## Detroit Nonmetropolitan AA

Table E1-1

| 2022 AA Combined Demographics<br>Assessment Area: Detroit Nonmetropolitan   |                           |                                    |                          |                  |  |                      |                           |              |
|---|---------------------------|------------------------------------|--------------------------|------------------|--|----------------------|---------------------------|--------------|
| Income Categories   | Tract Distribution        |                                    | Families by Tract Income |                  | Families < Poverty Level as % of Families by Tract |                      | Families by Family Income |              |
|   | #                         | %                                  | #                        | %                | #  | %                    | #                         | %            |
| Low   | 1                         | 5.6                                | 765                      | 4.6              | 197  | 25.8                 | 4,028                     | 24.1         |
| Moderate  | 5                         | 27.8                               | 3,465                    | 20.7             | 805  | 23.2                 | 2,954                     | 17.7         |
| Middle  | 9                         | 50.0                               | 9,060                    | 54.2             | 1,138  | 12.6                 | 3,578                     | 21.4         |
| Upper   | 3                         | 16.7                               | 3,441                    | 20.6             | 274  | 8.0                  | 6,171                     | 36.9         |
| Unknown   | 0                         | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total AA</b>   | <b>18</b>                 | <b>100.0</b>                       | <b>16,731</b>            | <b>100.0</b>     | <b>2,414</b>                                       | <b>14.4</b>          | <b>16,731</b>             | <b>100.0</b> |
|   | Housing Units by Tract    | Housing Type by Tract              |                          |                  |  |                      |                           |              |
|   |                           | Owner-occupied                     |                          |                  | Rental   |                      | Vacant                    |              |
| Low   | 1,314                     | 483                                | 2.8                      | 36.8             | 576  | 43.8                 | 255                       | 19.4         |
| Moderate  | 7,878                     | 3,275                              | 19.3                     | 41.6             | 3,164  | 40.2                 | 1,439                     | 18.3         |
| Middle  | 15,319                    | 9,783                              | 57.7                     | 63.9             | 3,244  | 21.2                 | 2,292                     | 15.0         |
| Upper   | 5,252                     | 3,413                              | 20.1                     | 65.0             | 1,200  | 22.8                 | 639                       | 12.2         |
| Unknown   | 0                         | 0                                  | 0.0                      | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total AA</b>   | <b>29,763</b>             | <b>16,954</b>                      | <b>100.0</b>             | <b>57.0</b>      | <b>8,184</b>                                       | <b>27.5</b>          | <b>4,625</b>              | <b>15.5</b>  |
|   | Total Businesses by Tract | Businesses by Tract & Revenue Size |                          |                  |  |                      |                           |              |
|   |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
| Low   | 104                       | 4.1                                | 91                       | 4.0              | 10   | 5.6                  | 3                         | 6.1          |
| Moderate  | 786                       | 31.3                               | 692                      | 30.3             | 83   | 46.9                 | 11                        | 22.4         |
| Middle  | 1,088                     | 43.4                               | 1,013                    | 44.4             | 53   | 29.9                 | 22                        | 44.9         |
| Upper   | 531                       | 21.2                               | 487                      | 21.3             | 31   | 17.5                 | 13                        | 26.5         |
| Unknown   | 0                         | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total AA</b>   | <b>2,509</b>              | <b>100.0</b>                       | <b>2,283</b>             | <b>100.0</b>     | <b>177</b>   | <b>100.0</b>         | <b>49</b>                 | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>  |                           |                                    | <b>91.0</b>              |                  |  | <b>7.1</b>           |                           | <b>2.0</b>   |
|   | Total Farms by Tract      | Farms by Tract & Revenue Size      |                          |                  |  |                      |                           |              |
|   |                           | Less Than or = \$1 Million         |                          | Over \$1 Million |  | Revenue Not Reported |                           |              |
| Low   | 0                         | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| Moderate  | 19                        | 12.2                               | 19                       | 12.3             | 0  | 0.0                  | 0                         | 0.0          |
| Middle  | 89                        | 57.1                               | 88                       | 56.8             | 1  | 100.0                | 0                         | 0.0          |
| Upper   | 48                        | 30.8                               | 48                       | 31.0             | 0  | 0.0                  | 0                         | 0.0          |
| Unknown   | 0                         | 0.0                                | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0          |
| <b>Total AA</b>   | <b>156</b>                | <b>100.0</b>                       | <b>155</b>               | <b>100.0</b>     | <b>1</b>   | <b>100.0</b>         | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>   |                           |                                    | <b>99.4</b>              |                  |  | <b>0.6</b>           |                           | <b>0.0</b>   |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                           |                                    |                          |                  |  |                      |                           |              |

Table E1-2

| 2023 AA Combined Demographics<br>Assessment Area: Detroit Nonmetropolitan   |                                    |        |                             |                  |   |                      |                              |       |
|---|------------------------------------|--------|-----------------------------|------------------|---|----------------------|------------------------------|-------|
| Income Categories   | Tract Distribution                 |        | Families by Tract<br>Income |                  | Families < Poverty Level<br>as % of Families by Tract |                      | Families by Family<br>Income |       |
|   | #                                  | %      | #                           | %                | #   | %                    | #                            | %     |
| Low   | 1                                  | 5.6    | 765                         | 4.6              | 197   | 25.8                 | 4,028                        | 24.1  |
| Moderate  | 5                                  | 27.8   | 3,465                       | 20.7             | 805   | 23.2                 | 2,954                        | 17.7  |
| Middle  | 9                                  | 50.0   | 9,060                       | 54.2             | 1,138   | 12.6                 | 3,578                        | 21.4  |
| Upper   | 3                                  | 16.7   | 3,441                       | 20.6             | 274   | 8.0                  | 6,171                        | 36.9  |
| Unknown   | 0                                  | 0.0    | 0                           | 0.0              | 0   | 0.0                  | 0                            | 0.0   |
| Total AA  | 18                                 | 100.0  | 16,731                      | 100.0            | 2,414   | 14.4                 | 16,731                       | 100.0 |
| Housing<br>Units by<br>Tract  | Housing Type by Tract              |        |                             |                  |   |                      |                              |       |
|   | Owner-occupied                     |        |                             | Rental           |   | Vacant               |                              |       |
| Low   | 1,314                              | 483    | 2.8                         | 36.8             | 576   | 43.8                 | 255                          | 19.4  |
| Moderate  | 7,878                              | 3,275  | 19.3                        | 41.6             | 3,164   | 40.2                 | 1,439                        | 18.3  |
| Middle  | 15,319                             | 9,783  | 57.7                        | 63.9             | 3,244   | 21.2                 | 2,292                        | 15.0  |
| Upper   | 5,252                              | 3,413  | 20.1                        | 65.0             | 1,200   | 22.8                 | 639                          | 12.2  |
| Unknown   | 0                                  | 0      | 0.0                         | 0.0              | 0   | 0.0                  | 0                            | 0.0   |
| Total AA  | 29,763                             | 16,954 | 100.0                       | 57.0             | 8,184   | 27.5                 | 4,625                        | 15.5  |
| Total Businesses by<br>Tract  | Businesses by Tract & Revenue Size |        |                             |                  |   |                      |                              |       |
|   | Less Than or =<br>\$1 Million      |        |                             | Over \$1 Million |   | Revenue Not Reported |                              |       |
|   | #                                  | %      | #                           | %                | #   | %                    | #                            | %     |
| Low   | 103                                | 4.2    | 90                          | 4.0              | 10  | 5.8                  | 3                            | 6.1   |
| Moderate  | 775                                | 31.4   | 683                         | 30.4             | 81  | 46.8                 | 11                           | 22.4  |
| Middle  | 1,068                              | 43.3   | 996                         | 44.4             | 50  | 28.9                 | 22                           | 44.9  |
| Upper   | 520                                | 21.1   | 475                         | 21.2             | 32  | 18.5                 | 13                           | 26.5  |
| Unknown   | 0                                  | 0.0    | 0                           | 0.0              | 0   | 0.0                  | 0                            | 0.0   |
| Total AA  | 2,466                              | 100.0  | 2,244                       | 100.0            | 173   | 100.0                | 49                           | 100.0 |
| Percentage of Total Businesses:   |                                    |        | 91.0                        |                  | 7.0   |                      | 2.0                          |       |
| Total Farms by Tract  | Farms by Tract & Revenue Size      |        |                             |                  |   |                      |                              |       |
|   | Less Than or =<br>\$1 Million      |        |                             | Over \$1 Million |   | Revenue Not Reported |                              |       |
|   | #                                  | %      | #                           | %                | #   | %                    | #                            | %     |
| Low   | 0                                  | 0.0    | 0                           | 0.0              | 0   | 0.0                  | 0                            | 0.0   |
| Moderate  | 19                                 | 12.3   | 19                          | 12.3             | 0   | 0.0                  | 0                            | 0.0   |
| Middle  | 88                                 | 56.8   | 87                          | 56.5             | 1   | 100.0                | 0                            | 0.0   |
| Upper   | 48                                 | 31.0   | 48                          | 31.2             | 0   | 0.0                  | 0                            | 0.0   |
| Unknown   | 0                                  | 0.0    | 0                           | 0.0              | 0   | 0.0                  | 0                            | 0.0   |
| Total AA  | 155                                | 100.0  | 154                         | 100.0            | 1   | 100.0                | 0                            | 0.0   |
| Percentage of Total Farms:  |                                    |        | 99.4                        |                  | 0.6   |                      | 0.0                          |       |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                    |        |                             |                  |   |                      |                              |       |

Table E1-3

| Geographic<br>Income<br>Level | Bank And Aggregate Loans |              |              |            |              |              | Total<br>Businesses<br>% |
|-------------------------------|--------------------------|--------------|--------------|------------|--------------|--------------|--------------------------|
|                               | Bank                     |              | Agg          | Bank       |              | Agg          |                          |
|                               | #                        | #%           | #%           | \$ (000)   | \$ %         | \$ %         |                          |
| Low                           | 0                        | 0.0          | 4.1          | 0          | 0.0          | 4.1          | 4.1                      |
| Moderate                      | 1                        | 50.0         | 21.5         | 360        | 92.3         | 23.4         | 31.3                     |
| Middle                        | 1                        | 50.0         | 49.1         | 30         | 7.7          | 45.1         | 43.4                     |
| Upper                         | 0                        | 0.0          | 24.1         | 0          | 0.0          | 27.1         | 21.2                     |
| Unknown                       | 0                        | 0.0          | 0.0          | 0          | 0.0          | 0.0          | 0.0                      |
| <b>Total</b>                  | <b>2</b>                 | <b>100.0</b> | <b>100.0</b> | <b>390</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b>             |

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 E1-4

|  | Bank And Aggregate Loans |              |              |            |              |              | Total<br>Businesses<br>% |
|--|--------------------------|--------------|--------------|------------|--------------|--------------|--------------------------|
|  | Bank                     |              | Agg          | Bank       |              | Agg          |                          |
|  | #                        | #%           | #%           | \$ (000)   | \$ %         | \$ %         |                          |
| <b>By Revenue</b>                                    |                          |              |              |            |              |              |                          |
| \$1 Million or Less                                  | 1                        | 50.0         | 56.8         | 30         | 7.7          | 54.4         | 91.0                     |
| Over \$1 Million                                     | 1                        | 50.0         |              | 360        | 92.3         |              | 7.1                      |
| Revenue Unknown                                      | 0                        | 0.0          |              | 0          | 0.0          |              | 2.0                      |
| <b>Total</b>   | <b>2</b>                 | <b>100.0</b> |              | <b>390</b> | <b>100.0</b> |              | <b>100.0</b>             |
| <b>By Loan Size</b>                                  |                          |              |              |            |              |              |                          |
| \$100,000 or Less                                    | 1                        | 50.0         | 92.8         | 30         | 7.7          | 42.0         |                          |
| \$100,001 - \$250,000                                | 0                        | 0.0          | 4.1          | 0          | 0.0          | 16.6         |                          |
| \$250,001 - \$1 Million                              | 1                        | 50.0         | 3.1          | 360        | 92.3         | 41.4         |                          |
| <b>Total</b>   | <b>2</b>                 | <b>100.0</b> | <b>100.0</b> | <b>390</b> | <b>100.0</b> | <b>100.0</b> |                          |
| <b>By Loan Size and Revenues \$1 Million or Less</b> |                          |              |              |            |              |              |                          |
| \$100,000 or Less                                    | 1                        | 100.0        |              | 30         | 100.0        |              |                          |
| \$100,001 - \$250,000                                | 0                        | 0.0          |              | 0          | 0.0          |              |                          |
| \$250,001 - \$1 Million                              | 0                        | 0.0          |              | 0          | 0.0          |              |                          |
| <b>Total</b>   | <b>1</b>                 | <b>100.0</b> |              | <b>30</b>  | <b>100.0</b> |              |                          |

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.

## Nixon Nonmetropolitan AA

Table E2-1

| 2022 AA Combined Demographics<br>Assessment Area: Nixon Nonmetropolitan   |                                    |              |                          |              |  |              |                           |              |
|---|------------------------------------|--------------|--------------------------|--------------|--|--------------|---------------------------|--------------|
| 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          | 1,007                     | 19.2         |
| Moderate  | 0                                  | 0.0          | 0                        | 0.0          | 0  | 0.0          | 938                       | 17.8         |
| Middle  | 6                                  | 100.0        | 5,257                    | 100.0        | 478  | 9.1          | 1,151                     | 21.9         |
| Upper   | 0                                  | 0.0          | 0                        | 0.0          | 0  | 0.0          | 2,161                     | 41.1         |
| Unknown   | 0                                  | 0.0          | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>   | <b>6</b>                           | <b>100.0</b> | <b>5,257</b>             | <b>100.0</b> | <b>478</b>   | <b>9.1</b>   | <b>5,257</b>              | <b>100.0</b> |
| Housing Units by Tract  | Housing Type by Tract              |              |                          |              |  |              |                           |              |
|   | Owner-occupied                     |              |                          | Rental       |  | Vacant       |                           |              |
|   | #                                  | % by tract   | % by unit                | #            | % by unit  | #            | % by unit                 |              |
| Low   | 0                                  | 0            | 0.0                      | 0            | 0.0  | 0            | 0.0                       |              |
| Moderate  | 0                                  | 0            | 0.0                      | 0            | 0.0  | 0            | 0.0                       |              |
| Middle  | 9,048                              | 5,230        | 100.0                    | 57.8         | 2,235  | 24.7         | 1,583                     | 17.5         |
| Upper   | 0                                  | 0            | 0.0                      | 0            | 0  | 0.0          | 0                         | 0.0          |
| Unknown   | 0                                  | 0            | 0.0                      | 0            | 0  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>   | <b>9,048</b>                       | <b>5,230</b> | <b>100.0</b>             | <b>57.8</b>  | <b>2,235</b>                                       | <b>24.7</b>  | <b>1,583</b>              | <b>17.5</b>  |
| Total Businesses by Tract   | Businesses by Tract & Revenue Size |              |                          |              |  |              |                           |              |
|   | Less Than or = \$1 Million         |              | Over \$1 Million         |              | Revenue Not Reported                               |              |                           |              |
|   | #                                  | %            | #                        | %            | #  | %            | #                         | %            |
| Low   | 0                                  | 0.0          | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| Moderate  | 0                                  | 0.0          | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| Middle  | 797                                | 100.0        | 721                      | 100.0        | 56   | 100.0        | 20                        | 100.0        |
| Upper   | 0                                  | 0.0          | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| Unknown   | 0                                  | 0.0          | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>   | <b>797</b>                         | <b>100.0</b> | <b>721</b>               | <b>100.0</b> | <b>56</b>  | <b>100.0</b> | <b>20</b>                 | <b>100.0</b> |
| <b>Percentage of Total Businesses:</b>  |                                    |              | <b>90.5</b>              |              |  | <b>7.0</b>   |                           | <b>2.5</b>   |
| Total Farms by Tract  | Farms by Tract & Revenue Size      |              |                          |              |  |              |                           |              |
|   | Less Than or = \$1 Million         |              | Over \$1 Million         |              | Revenue Not Reported                               |              |                           |              |
|   | #                                  | %            | #                        | %            | #  | %            | #                         | %            |
| Low   | 0                                  | 0.0          | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| Moderate  | 0                                  | 0.0          | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| Middle  | 103                                | 100.0        | 101                      | 100.0        | 2  | 100.0        | 0                         | 0.0          |
| Upper   | 0                                  | 0.0          | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| Unknown   | 0                                  | 0.0          | 0                        | 0.0          | 0  | 0.0          | 0                         | 0.0          |
| <b>Total AA</b>   | <b>103</b>                         | <b>100.0</b> | <b>101</b>               | <b>100.0</b> | <b>2</b>   | <b>100.0</b> | <b>0</b>                  | <b>0.0</b>   |
| <b>Percentage of Total Farms:</b>   |                                    |              | <b>98.1</b>              |              |  | <b>1.9</b>   |                           | <b>0.0</b>   |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                    |              |                          |              |  |              |                           |              |

Table E2-2

| 2023 AA Combined Demographics<br>Assessment Area: Nixon Nonmetropolitan   |                                    |            |                          |                  |  |                      |                           |       |  |  |
|---|------------------------------------|------------|--------------------------|------------------|--|----------------------|---------------------------|-------|--|--|
| 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                  | 1,007                     | 19.2  |  |  |
| Moderate  | 0                                  | 0.0        | 0                        | 0.0              | 0  | 0.0                  | 938                       | 17.8  |  |  |
| Middle  | 6                                  | 100.0      | 5,257                    | 100.0            | 478  | 9.1                  | 1,151                     | 21.9  |  |  |
| Upper   | 0                                  | 0.0        | 0                        | 0.0              | 0  | 0.0                  | 2,161                     | 41.1  |  |  |
| Unknown   | 0                                  | 0.0        | 0                        | 0.0              | 0  | 0.0                  | 0                         | 0.0   |  |  |
| Total AA  | 6                                  | 100.0      | 5,257                    | 100.0            | 478  | 9.1                  | 5,257                     | 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                       |       |  |  |
| Moderate  | 0                                  | 0          | 0.0                      | 0                | 0.0  | 0                    | 0.0                       |       |  |  |
| Middle  | 9,048                              | 5,230      | 100.0                    | 57.8             | 2,235  | 24.7                 | 1,583                     | 17.5  |  |  |
| Upper   | 0                                  | 0          | 0.0                      | 0                | 0.0  | 0                    | 0.0                       |       |  |  |
| Unknown   | 0                                  | 0          | 0.0                      | 0                | 0.0  | 0                    | 0.0                       |       |  |  |
| Total AA  | 9,048                              | 5,230      | 100.0                    | 57.8             | 2,235  | 24.7                 | 1,583                     | 17.5  |  |  |
| 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  | 780                                | 100.0      | 707                      | 100.0            | 54   | 100.0                | 19                        | 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  | 780                                | 100.0      | 707                      | 100.0            | 54   | 100.0                | 19                        | 100.0 |  |  |
| Percentage of Total Businesses:   |                                    |            | 90.6                     |                  | 6.9  |                      | 2.4                       |       |  |  |
| 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  | 102                                | 100.0      | 100                      | 100.0            | 2  | 100.0                | 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  | 102                                | 100.0      | 100                      | 100.0            | 2  | 100.0                | 0                         | 0.0   |  |  |
| Percentage of Total Farms:  |                                    |            | 98.0                     |                  | 2.0  |                      | 0.0                       |       |  |  |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |                                    |            |                          |                  |  |                      |                           |       |  |  |

Table E2-3

| Geographic<br>Income<br>Level | Bank And Aggregate Loans By Year |       |       |         |       |       |      |       |       |         |       |       | Total<br>Businesses<br>% |  |
|-------------------------------|----------------------------------|-------|-------|---------|-------|-------|------|-------|-------|---------|-------|-------|--------------------------|--|
|                               | 2022                             |       |       |         |       |       | 2023 |       |       |         |       |       |                          |  |
|                               | Bank                             |       | Agg   | Bank    |       | Agg   | Bank |       | Agg   | Bank    |       | Agg   |                          |  |
|                               | #                                | #%    | #%    | \$(000) | \$%   | \$%   | #    | #%    | #%    | \$(000) | \$%   | \$%   |                          |  |
| Low                           | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |  |
| Moderate                      | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |  |
| Middle                        | 1                                | 100.0 | 98.8  | 97      | 100.0 | 99.7  | 1    | 100.0 | 99.6  | 68      | 100.0 | 99.9  | 100.0                    |  |
| Upper                         | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |  |
| Unknown                       | 0                                | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0    | 0.0   | 0.0   | 0       | 0.0   | 0.0   | 0.0                      |  |
| Total                         | 1                                | 100.0 | 100.0 | 97      | 100.0 | 100.0 | 1    | 100.0 | 100.0 | 68      | 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 E2-4

| Geographic<br>Income<br>Level | Bank And Aggregate Loans |       |       |         |       |       | Total<br>Farms % |
|-------------------------------|--------------------------|-------|-------|---------|-------|-------|------------------|
|                               | Bank                     |       | Agg   | Bank    |       | Agg   |                  |
|                               | #                        | #%    | #%    | \$(000) | \$%   | \$%   |                  |
|                               | 0                        | 0.0   | 0.0   | 0       | 0.0   | 0.0   |                  |
| 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                        | 1                        | 100.0 | 96.2  | 10      | 100.0 | 99.1  | 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                         | 1                        | 100.0 | 100.0 | 10      | 100.0 | 100.0 | 100.0            |

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 E2-5

|   | Distribution of 2022 and 2023 Small Business Lending By Revenue Size of Businesses |       |       |          |       |       |      |       |                    |          |       |       |       |
|---|--|-------|-------|----------|-------|-------|------|-------|--------------------|----------|-------|-------|-------|
|   | Assessment Area: Nixon Nonmetropolitan   |       |       |          |       |       |      |       |                    |          |       |       |       |
|   | Bank And Aggregate Loans By Year   |       |       |          |       |       |      |       | Total Businesses % |          |       |       |       |
|   | 2022   |       | 2023  |          |       |       |      |       |                    |          |       |       |       |
|   | Bank   | Agg   | Bank  | Agg      | Bank  | Agg   | Bank | Agg   |                    |          |       |       |       |
|   | #  | #%    | #%    | \$ (000) | \$ %  | \$ %  | #    | #%    | #%                 | \$ (000) | \$ %  | \$ %  |       |
| <b>By Revenue</b>   |  |       |       |          |       |       |      |       |                    |          |       |       |       |
| <b>\$1 Million or Less</b>  | 0  | 0.0   | 47.0  | 0        | 0.0   | 33.4  | 0    | 0.0   | 46.5               | 0        | 0.0   | 30.7  | 90.6  |
| <b>Over \$1 Million</b>   | 0  | 0.0   |       | 0        | 0.0   |       | 0    | 0.0   |                    | 0        | 0.0   |       | 6.9   |
| <b>Revenue Unknown</b>  | 1  | 100.0 |       | 97       | 100.0 |       | 1    | 100.0 |                    | 68       | 100.0 |       | 2.4   |
| <b>Total</b>  | 1  | 100.0 |       | 97       | 100.0 |       | 1    | 100.0 |                    | 68       | 100.0 |       | 100.0 |
| <b>By Loan Size</b>   |  |       |       |          |       |       |      |       |                    |          |       |       |       |
| <b>\$100,000 or Less</b>  | 1  | 100.0 | 96.0  | 97       | 100.0 | 51.3  | 1    | 100.0 | 95.7               | 68       | 100.0 | 56.3  |       |
| <b>\$100,001 - \$250,000</b>  | 0  | 0.0   | 2.1   | 0        | 0.0   | 13.3  | 0    | 0.0   | 3.1                | 0        | 0.0   | 21.5  |       |
| <b>\$250,001 - \$1 Million</b>  | 0  | 0.0   | 1.8   | 0        | 0.0   | 35.4  | 0    | 0.0   | 1.2                | 0        | 0.0   | 22.1  |       |
| <b>Total</b>  | 1  | 100.0 | 100.0 | 97       | 100.0 | 100.0 | 1    | 100.0 | 100.0              | 68       | 100.0 | 100.0 |       |
| <b>By Loan Size and Revenues \$1 Million or Less</b>  |  |       |       |          |       |       |      |       |                    |          |       |       |       |
| <b>\$100,000 or Less</b>  | 0  | 0.0   |       | 0        | 0.0   |       | 0    | 0.0   |                    | 0        | 0.0   |       |       |
| <b>\$100,001 - \$250,000</b>  | 0  | 0.0   |       | 0        | 0.0   |       | 0    | 0.0   |                    | 0        | 0.0   |       |       |
| <b>\$250,001 - \$1 Million</b>  | 0  | 0.0   |       | 0        | 0.0   |       | 0    | 0.0   |                    | 0        | 0.0   |       |       |
| <b>Total</b>  | 0  | 0.0   |       | 0        | 0.0   |       | 0    | 0.0   |                    | 0        | 0.0   |       |       |
| Source: 2023 FFIEC Census Data<br>2023 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |  |       |       |          |       |       |      |       |                    |          |       |       |       |

Table E2-6

|   | Distribution of 2022 Small Farm Lending By Revenue Size of Farms |       |       |          |       |    |               |      |  |  |  |       |
|---|--|-------|-------|----------|-------|----|---------------|------|--|--|--|-------|
|   | Assessment Area: Nixon Nonmetropolitan                           |       |       |          |       |    |               |      |  |  |  |       |
|   | Bank And Aggregate Loans   |       |       |          |       |    | Total Farms % |      |  |  |  |       |
|   | Bank   | Agg   | Bank  | Agg      | #     | #% | \$ (000)      | \$ % |  |  |  |       |
|   | #  | #%    | #%    | \$ (000) |       |    |               |      |  |  |  |       |
| <b>By Revenue</b>   |  |       |       |          |       |    |               |      |  |  |  |       |
| <b>\$1 Million or Less</b>  | 1  | 100.0 | 61.5  | 10       | 100.0 |    | 76.9          |      |  |  |  | 98.1  |
| <b>Over \$1 Million</b>   | 0  | 0.0   |       | 0        | 0.0   |    |               |      |  |  |  | 1.9   |
| <b>Revenue Unknown</b>  | 0  | 0.0   |       | 0        | 0.0   |    |               |      |  |  |  | 0.0   |
| <b>Total</b>  | 1  | 100.0 |       | 10       | 100.0 |    |               |      |  |  |  | 100.0 |
| <b>By Loan Size</b>   |  |       |       |          |       |    |               |      |  |  |  |       |
| <b>\$100,000 or Less</b>  | 1  | 100.0 | 92.3  | 10       | 100.0 |    | 50.4          |      |  |  |  |       |
| <b>\$100,001 - \$250,000</b>  | 0  | 0.0   | 5.8   | 0        | 0.0   |    |               |      |  |  |  | 33.1  |
| <b>\$250,001 - \$500,000</b>  | 0  | 0.0   | 1.9   | 0        | 0.0   |    |               |      |  |  |  | 16.5  |
| <b>Total</b>  | 1  | 100.0 | 100.0 | 10       | 100.0 |    | 100.0         |      |  |  |  |       |
| <b>By Loan Size and Revenues \$1 Million or Less</b>  |  |       |       |          |       |    |               |      |  |  |  |       |
| <b>\$100,000 or Less</b>  | 1  | 100.0 |       | 10       | 100.0 |    |               |      |  |  |  |       |
| <b>\$100,001 - \$250,000</b>  | 0  | 0.0   |       | 0        | 0.0   |    |               |      |  |  |  |       |
| <b>\$250,001 - \$500,000</b>  | 0  | 0.0   |       | 0        | 0.0   |    |               |      |  |  |  |       |
| <b>Total</b>  | 1  | 100.0 |       | 10       | 100.0 |    |               |      |  |  |  |       |
| Source: 2022 FFIEC Census Data<br>2022 Dun & Bradstreet Data<br>2016-2020 U.S. Census Bureau: American Community Survey<br>Note: Percentages may not total 100.0 percent due to rounding. |  |       |       |          |       |    |               |      |  |  |  |       |

## APPENDIX F – GLOSSARY

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

**Census tract:** A small, relatively permanent statistical subdivision of a county. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts average about 4,000 inhabitants, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to the population characteristics, economic status, and living conditions to allow for statistical comparisons.

**Community development:** All Agencies have adopted the following language:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



## Banking Center Locations

### **Humble Branch & Headquarters:**

Address: 20202 Highway 59 North, Humble, Texas 77338

Phone: 833-844-7708

Hours of Operation for Lobby: 9:00 am to 5:00 pm Monday - Friday

County: Harris - Tract Code: 2507.01

### **Austin Branch:**

Address: 1508 West 5<sup>th</sup> Street, Suite 100, Austin, Texas 78703

Phone: 833-844-7708

Hours of Operation for Lobby: 9:00 am to 5:00 pm Monday – Friday

County: Travis – Tract Code: 0012.00

### **Beaumont Branch:**

Address: 3650 North Major Dr., Beaumont, Texas 77713

Phone: 833-844-7708

Hours of Operation for Lobby and Drive-thru: 9:00 am to 5:00 pm Monday - Friday

County: Jefferson - Tract Code: 0003.12

### **Conroe Branch:**

Address: 1336 League Line Rd., Suite 100 Conroe, Texas 77304

Phone: 833-844-7708

Hours of Operation for Lobby and Drive-thru: 9:00 am to 5:00 pm Monday - Friday

County: Montgomery - Tract Code: 6942.08

### **Dallas Branch:**

Address: 8235 Douglas Ave, Suite 100, Dallas, Texas 75225

Phone: 833-844-7708

Hours of Operation for Lobby: 8:30 am to 4:00 pm Monday - Friday

County: Dallas - Tract Code: 0073.01

### **Detroit Branch:**

Address: 12038 Highway 82 West, Detroit, TX 75436

Phone: 833-844-7708

Hours of Operation for Lobby: 9:00 am to 5:00 pm Monday- Friday

Hours of Operation for Drive-thru: 8:30 am to 5:00 pm Monday - Friday

County: Red River - Tract Code: 9507.00

### **Fort Worth Branch:**

Address: 1400 West 7<sup>th</sup> Street, Suite 100, Fort Worth, TX 76102

Phone: 833-844-7708

Hours of Operation for Lobby: 9:00 am to 5:00 pm Monday - Friday

Hour of Operation for Drive-thru: 8:30 am to 5:00 pm Monday - Friday

County: Tarrant – Tract Code: 1233.01

**Galleria Branch:**

Address: 1800 West Loop South, Suite 100 Houston, Texas 77027

Phone: 833-844-7708

Hours of Operation for Lobby: 8:30 am to 4:00 pm Monday - Friday

County: Harris - Tract Code: 4318.04

**Georgetown Branch:**

Address: 200 East 8<sup>th</sup> Street, Suite 102, Georgetown, TX 78626

Phone: 833-844-7708

Hours of Operation for Lobby: 9:00 am to 5:00 pm Monday - Friday

County: Williamson – Tract Code: 0214.02

**Kingwood Branch:**

Address: 1910 W Lake Houston Parkway, Kingwood, TX 77339

Phone: 833-844-7708

Hours of Operation for Lobby and Drive-thru: 9:00 am to 5:00 pm Monday - Friday

County: Harris – Tract Code: 2509.01

**Lake Jackson Branch:**

Address: 85 Oak Drive Lake Jackson, TX 77566

Phone: 833-844-7708

Hours of Operation for Lobby: 9:00 am to 5:00 pm Monday- Friday

Hours of Operation for Drive-thru: 8:00 am to 5:00 pm Monday - Friday

County: Brazoria - Tract Code: 6633.00

**La Vernia Branch:**

Address: 13809 W. Hwy 87 La Vernia, TX 78121

Phone: 833-844-7708

Hours of Operation for Lobby: 9:00 am to 5:00 pm Monday - Friday

Hours of Operation for Drive-thru: 8:00 am to 5:00 pm Monday – Friday

County: Wilson - Tract Code: 0001.03

**Memorial City Branch:**

Address: 800 Gessner, Suite 250, Houston, TX 77024

Phone: 833-844-7708

Hours of Operation for Lobby: 9:00 am to 5:00 pm Monday - Friday

County: Harris – Tract Code: 4307.00

**Mid County Branch:**

Address: 3360 Jimmy Johnson Boulevard, Port Arthur, TX 77642

Phone: 833-844-7708

Hours of Operation for Lobby 9:00 am to 5:00 pm Monday – Friday

County: Jefferson - Tract Code: 0070.04

**Nixon Branch:**

Address: 200 N. Nixon Ave. Nixon, TX 78140

Phone: 833-844-7708

Hours of Operation for Lobby: 9:00 am to 5:00 pm Monday - Friday

Hours of Operation for Walk-Up Window: 8:30 am to 9:00 am Monday - Friday

County: Gonzales - Tract Code: 0005.00

**Pearland Branch:**

Address: 1850 Pearland Parkway Pearland, TX 77581

Phone: 833-844-7708

Hours of Operation for Lobby and Drive-thru: 9:00 am to 5:00 pm Monday - Friday

County: Brazoria - Tract Code: 6604.02

**Plano Branch:**

Address: 5000 Legacy Dr., Suite 120, Plano, Texas 75024

Phone: 833-844-7708

Hours of Operation for Lobby: 9:00 am to 5:00 pm Monday - Friday

County: Collin – Tract Code: 0316.72

**San Antonio Branch:**

Address: 420 Broadway, Suite 2101, San Antonio, TX 78205

Phone: 833-844-7708

Hours of Operation for Lobby: 9:00 am to 5:00 pm Monday - Friday

County: Bexar – Tract Code: 1101.00

**The Woodlands Branch:**

Address: 9709 Lakeside Blvd., Suite 117, The Woodlands, TX 77381

Phone: 281-446-7000

Hours of Operation for Lobby: 9:00 am to 5:00 pm Monday - Friday

County: Montgomery – Tract Code: 6912.01





## **Bank Branches Open/Close Dates from 2024 – 2026**

### **Austin Branch:**

Open Date: 4/22/2024

Address: 1508 West 5<sup>th</sup> Street, Suite 100, Austin, TX 78703

### **Beaumont Branch:**

Open Date: 4/1/2009 – Closed 5/14/2024

Address: 229 Dowlen Road, Suite C, Beaumont, TX 77706

### **Beaumont Branch:**

Open Date: 5/15/2024

Address: 3650 North Major Dr, Beaumont, TX 77713

### **Memorial City Branch:**

Open Date: 8/12/2024

Address: 800 Gessner, Suite 250, Houston, TX 77024

### **Mid-County Branch:**

Close date: 8/15/2025

Address: 2901 Turtle Creek Drive, Ste 115, Port Arthur, TX 77642

### **Mid-County Branch:**

Temporary Relocation Open Date: 8/18/2025

Address: 3360 Jimmy Johnson Blvd, Port Arthur, TX 77642

### **The Woodlands Branch:**

Open Date: 6/10/2024

Address: 9709 Lakeside Blvd., Suite 117, The Woodlands, TX 77381



## Bank Products & Services

### Depository Products & Services

#### Personal Checking Accounts

- Superior Interest Checking
- Supreme 50 Interest Checking
- Smart Interest Checking
- Select Free Checking
- Simply Checking
- Third Coast Premium Checking
- Premier Interest Checking
- Workplace Checking

#### Personal Savings & CDs Accounts

- TCB Personal Money Market
- TCB Personal Savings
- Simply Savings
- CashSweep MMA
- CDs & IRAs (various maturities available)
- Premier Money Market
- Workplace Savings

#### Personal Services

- Debit Cards (ATM Services, Contactless Debit Cards, Digital Wallets)
- Online Banking
- Mobile Banking
- Bill Pay
- E-Statements
- Mobile Deposits
- Online Account Opening
- Zelle
- Safe Deposit Boxes (Detroit, Galleria, La Vernia, Nixon, Pearland)

#### Business Checking Accounts

- Select Free Business Checking
- Business Interest Checking
- Commercial Analysis Checking
- Business Advantage Checking

#### Business Savings & CDs Accounts

- TCB Business Savings
- TCB Business Money Market
- CDs (various maturities available)
- Business Advantage Money Market

#### Business Services

- Debit Cards
- Online Banking
- Mobile Banking
- Bill Pay
- E-Statements
- Mobile Deposits
- Safe Deposit Boxes (select locations)

#### Treasury Management Services

- Treasury Management Online Banking
- ACH Origination Services
- Online Wire Transfer Services
- Positive Pay Services
- ACH Positive Pay Services
- Remote Deposit Capture Services
- Account Sweep Services
- Lockbox Services
- Business Credit Cards
- Business Purchasing Cards
- Merchant Services – acceptance of card payments
- SmartPay Express – acceptance of online payments
- OFX – Direct Connect with Intuit products QuickBooks & Quicken
- ZSuites Digital Escrow Accounts
- Secure File Transmissions (SFTP)
- Autobooks
- DACAs

## Lending Products & Services

#### Commercial Lending Services

- Commercial Lines of Credit
- Commercial Term Loans
- Owner-Occupied Real Estate and Investment Real Estate Financing
- U.S. Small Business Administration (SBA) Loans
- Equipment Financing

#### Mortgage Lending Services

- Fixed Rate and Adjustable Mortgage Loans

#### Personal Lending Services

- Personal Credit Cards
- Short Term Loans

- Revolving Lines of Credit
- Term Loans: Consumer Vehicle Loans, Consumer Recreational Vehicle Loans, Consumer Boat Loans
- Unsecured Loans
- CD Secured Loans
- Stock and Bond Secured Loans

## SCHEDULE OF FEES

The following fees may be assessed against your account and the following transaction limitations, if any, apply to your account:

|   |  |
|---|--|
| Account activity printout                           | \$2.00                                     |
| Account balancing assistance                        | \$35.00 per hour                           |
| Account research                                    | \$35.00 per hour                           |
| Items per copy - each                               | \$3.00                                     |
| ATM Withdrawal at any ATM                           | No Charge                                  |
| Replace lost Debit/ATM card                         | \$10.00                                    |
| Automatic transfer of funds between<br>TCB Accounts | \$0.00                                     |
| Cashier's Checks - Customers Only                   | \$5.00                                     |
| Money Orders - Customer Only                        | \$2.00                                     |
| Deposit Correction (per deposit)                    | \$5.00                                     |
| Charge Back Fee/Redeposit (per item)                | \$5.00                                     |
| Check Printing                                      | (fee depends on style<br>of check ordered) |
| Rolled Coin   | \$0.10 each                                |
| Strap of Currency                                   | \$0.25 each                                |
| Money Service Business Application<br>Fee           | \$200.00                                   |
| Collection letters - incoming and<br>outgoing       | \$15.00                                    |
| International Collections                           | \$30.00                                    |
| Domestic Wire Transfers                             |  |
| Outgoing wire transfers<br>(Consumer)               | \$15.00                                    |
| Outgoing wire transfers (Business)                  | \$25.00                                    |
| Incoming wire transfers<br>(Consumer)               | \$0.00                                     |
| Incoming wire transfers (Business)                  | \$10.00                                    |
| Same Day Tax Wire                                   | \$25.00                                    |
| Foreign (outgoing) Wire Transfers                   | \$60.00                                    |
| New Account Closed within 90 days                   | \$10.00                                    |
| Garnishments, Levies or Court Orders                | \$75.00 plus attorney<br>fees              |
| Zipper Bags   | \$5.00                                     |
| Photocopies (each)                                  | \$3.00                                     |
| Special handling fee (per cycle)                    | \$25.00                                    |
| Special statement cutoff                            | \$5.00                                     |
| Stop Payments (all items)                           | \$32.00                                    |
| Temporary Checks                                    | \$5.00 per 10                              |
| Consumer Overdraft Item Fee                         | \$19.00                                    |
| Return Item Fee                                     | \$0.00                                     |



## **CRA DESIGNATED ASSESSMENT AREAS**

Third Coast Bank has seven designated Assessment Areas that include:

**Austin-Round Rock-San Marcos MSA** – Travis and Williamson Counties.

Branch: Austin, Georgetown

**Beaumont-Port Arthur MSA** - Hardin, Jefferson and Orange Counties.

Branches: Beaumont, Mid-County

**Dallas-Fort Worth-Arlington MSA** – Collin, Dallas and Tarrant Counties.

Branches: Dallas, Plano, Fort Worth

**Detroit Nonmetropolitan** - Lamar and Red River Counties.

Branch: Detroit

**Houston-Pasadena-The Woodlands MSA** - Brazoria, Harris and Montgomery Counties.

Branches: Conroe, Galleria, Humble, Kingwood, Lake Jackson, Memorial City, Pearland, The Woodlands

**Nixon Nonmetropolitan** - Gonzales County.

Branch: Nixon

**San Antonio-New Braunfels MSA** - Bexar County, Guadalupe and Wilson Counties.

Branches: La Vernia, San Antonio



## Assessment Area Maps

Third Coast Bank has seven designated Assessment Areas that include:

Austin-Round Rock-Georgetown MSA – Travis and Williamson Counties.

Branch: Austin, Georgetown

Beaumont-Port Arthur MSA - Hardin, Jefferson and Orange Counties.

Branches: Beaumont, Mid-County

Dallas-Fort Worth MSA – Collin, Dallas and Tarrant Counties.

Branches: Dallas, Plano, Fort Worth

Detroit Non MSA - Lamar and Red River Counties.

Branch: Detroit

Houston-The Woodlands-Sugar Land MSA - Brazoria, Harris and Montgomery Counties.

Branches: Conroe, Galleria, Humble, Kingwood, Lake Jackson, Memorial City, Pearland, The Woodlands

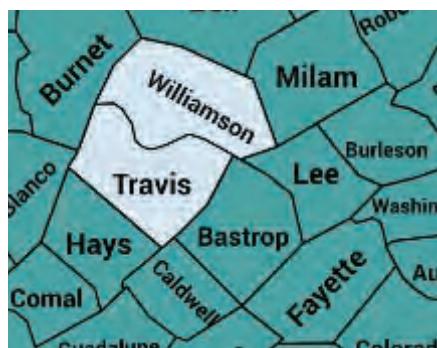
Nixon Non-MSA - Gonzales County.

Branch: Nixon

San Antonio – New Braunfels MSA - Bexar County, Guadalupe and Wilson Counties.

Branches: La Vernia, San Antonio

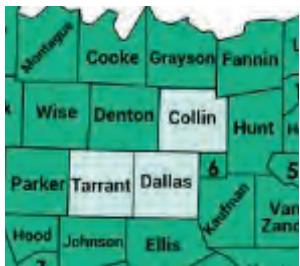
**Austin-Round Rock-San Marcos MSA – Travis and Williamson Counties.**



**Beaumont-Port Arthur MSA - Hardin, Jefferson and Orange Counties.**



**Dallas-Fort Worth-Arlington MSA – Collin, Dallas and Tarrant Counties.**



Numbered Counties on Map (not in FBAA):

5 – Rains

6 – Rockwall

**Detroit Non-MSA - Lamar and Red River Counties.**



Numbered Counties on Map (not in FBAA):

1 – Delta

2 – Franklin

3 – Morris

4 – Camp

5 – Rains

**Houston-Pasadena-The Woodlands MSA - Brazoria, Harris and Montgomery Counties.**



**Nixon Non-MSA - Gonzales County.**



**San Antonio-New Braunfels MSA - Bexar County, Guadalupe and Wilson Counties.**



Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: FLORIDA (12)

| Area Income Characteristics      | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item:<br>Loans by Affiliates |
|----------------------------------|---|---|--|---|--------------|-----------------------------------|
|                                  | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                     |
| <b>SARASOTA COUNTY (115), FL</b> |   |   |  |   |              |                                   |
| MSA 35840                        |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Upper Income                     | 1   | 100   | 0  | 0   | 0            | 100                               |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 1   | 100   | 0  | 0   | 1            | 100                               |
| <b>TOTAL INSIDE AA IN STATE</b>  | <b>0</b>                                  | <b>0</b>  | <b>0</b>                                 | <b>0</b>  | <b>0</b>     | <b>0</b>                          |
| <b>TOTAL OUTSIDE AA IN STATE</b> | <b>1</b>                                  | <b>100</b>  | <b>0</b>                                 | <b>0</b>  | <b>1</b>     | <b>100</b>                        |
| <b>STATE TOTAL</b>               | <b>1</b>                                  | <b>100</b>  | <b>0</b>                                 | <b>0</b>  | <b>1</b>     | <b>100</b>                        |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: LOUISIANA (22)

| Area Income Characteristics             | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item:<br>Loans by Affiliates |
|---|---|---|--|---|--------------|-----------------------------------|
|   | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                     |
| <b>BEAUREGARD PARISH (011), LA</b>      |   |   |  |   |              |                                   |
| MSA NA                                  |   |   |  |   |              |                                   |
| Outside Assessment Area                 |   |   |  |   |              |                                   |
| Low Income                              | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                         | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                           | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Upper Income                            | 0   | 0   | 0  | 1   | 554          | 1                                 |
| Income Not Known                        | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                         | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                            | 0   | 0   | 0  | 1   | 554          | 1                                 |
| <b>JEFFERSON DAVIS PARISH (053), LA</b> |   |   |  |   |              |                                   |
| MSA 29340                               |   |   |  |   |              |                                   |
| Outside Assessment Area                 |   |   |  |   |              |                                   |
| Low Income                              | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                         | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                           | 0   | 0   | 0  | 1   | 273          | 1                                 |
| Upper Income                            | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known                        | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                         | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                            | 0   | 0   | 0  | 1   | 273          | 1                                 |
| <b>ST. MARY PARISH (101), LA</b>        |   |   |  |   |              |                                   |
| MSA NA                                  |   |   |  |   |              |                                   |
| Outside Assessment Area                 |   |   |  |   |              |                                   |
| Low Income                              | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                         | 1   | 100   | 1  | 220   | 1            | 848                               |
| Middle Income                           | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Upper Income                            | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known                        | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                         | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                            | 1   | 100   | 1  | 220   | 1            | 848                               |
| TOTAL INSIDE AA IN STATE                | 0   | 0   | 0  | 0   | 0            | 0                                 |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: LOUISIANA (22)

| Area Income Characteristics | Loan Amount at Origination<br><=\$100,000 |                  | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 |                  | Loan Amount at Origination<br>>\$250,000 |                  | Loans to Businesses<br>with Gross Annual<br>Revenues <= \$1<br>Million |                  | Memo Item:<br>Loans by<br>Affiliates |                  |
|-----------------------------|---|------------------|---|------------------|--|------------------|--|------------------|--------------------------------------|------------------|
|                             | Num of<br>Loans                           | Amount<br>(000s) | Num of<br>Loans   | Amount<br>(000s) | Num of<br>Loans                          | Amount<br>(000s) | Num of<br>Loans  | Amount<br>(000s) | Num of<br>Loans                      | Amount<br>(000s) |
| TOTAL OUTSIDE AA IN STATE   | 1   | 100              | 1   | 220              | 3  | 1,675            | 2  | 827              | 0                                    | 0                |
| STATE TOTAL                 | 1   | 100              | 1   | 220              | 3  | 1,675            | 2  | 827              | 0                                    | 0                |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: MICHIGAN (26)

| Area Income Characteristics            | Loan Amount at<br>Origination<br><=\$100,000 | Loan Amount at<br>Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at<br>Origination<br>>\$250,000 | Loans to Businesses<br>with Gross Annual<br>Revenues <= \$1<br>Million |                 | Memo Item:<br>Loans by<br>Affiliates |                 |                  |
|--|--|--|---|--|-----------------|--------------------------------------|-----------------|------------------|
|  | Num of<br>Loans                              | Amount<br>(000s)   | Num of<br>Loans                             | Amount<br>(000s)   | Num of<br>Loans | Amount<br>(000s)                     | Num of<br>Loans | Amount<br>(000s) |
| <b>GRAND TRAVERSE COUNTY (055), MI</b> |  |  |   |  |                 |                                      |                 |                  |
| MSA 45900                              |  |  |   |  |                 |                                      |                 |                  |
| Outside Assessment Area                |  |  |   |  |                 |                                      |                 |                  |
| Low Income                             | 0  | 0  | 0   | 0  | 0               | 0                                    | 0               | 0                |
| Moderate Income                        | 0  | 0  | 0   | 0  | 0               | 0                                    | 0               | 0                |
| Middle Income                          | 0  | 0  | 0   | 0  | 1               | 425                                  | 1               | 425              |
| Upper Income                           | 0  | 0  | 0   | 0  | 0               | 0                                    | 0               | 0                |
| Income Not Known                       | 0  | 0  | 0   | 0  | 0               | 0                                    | 0               | 0                |
| Tract Not Known                        | 0  | 0  | 0   | 0  | 0               | 0                                    | 0               | 0                |
| County Total                           | 0  | 0  | 0   | 0  | 1               | 425                                  | 1               | 425              |
| <b>TOTAL INSIDE AA IN STATE</b>        | <b>0</b>                                     | <b>0</b>   | <b>0</b>                                    | <b>0</b>   | <b>0</b>        | <b>0</b>                             | <b>0</b>        | <b>0</b>         |
| <b>TOTAL OUTSIDE AA IN STATE</b>       | <b>0</b>                                     | <b>0</b>   | <b>0</b>                                    | <b>0</b>   | <b>1</b>        | <b>425</b>                           | <b>1</b>        | <b>425</b>       |
| <b>STATE TOTAL</b>                     | <b>0</b>                                     | <b>0</b>   | <b>0</b>                                    | <b>0</b>   | <b>1</b>        | <b>425</b>                           | <b>1</b>        | <b>425</b>       |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics      | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item:<br>Loans by Affiliates |
|----------------------------------|---|---|--|---|--------------|-----------------------------------|
|                                  | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                     |
| <b>ARANSAS COUNTY (007), TX</b>  |   |   |  |   |              |                                   |
| MSA 18580                        |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                    | 0   | 0   | 0  | 1   | 900          | 1                                 |
| Upper Income                     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 0   | 0   | 0  | 1   | 900          | 1                                 |
| <b>ATASCOSA COUNTY (013), TX</b> |   |   |  |   |              |                                   |
| MSA 41700                        |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                    | 0   | 0   | 1  | 115   | 0            | 1                                 |
| Upper Income                     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 0   | 0   | 1  | 115   | 0            | 1                                 |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics      | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item:<br>Loans by Affiliates |
|----------------------------------|---|---|--|---|--------------|-----------------------------------|
|                                  | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                     |
| <b>BEXAR COUNTY (029), TX</b>    |   |   |  |   |              |                                   |
| MSA 41700                        |   |   |  |   |              |                                   |
| Inside AA 0007                   |   |   |  |   |              |                                   |
| Median Family Income < 10%       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 10-20%      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 20-30%      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 30-40%      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 40-50%      | 0   | 0   | 1  | 250   | 0            | 0                                 |
| Median Family Income 50-60%      | 1   | 30  | 0  | 0   | 0            | 0                                 |
| Median Family Income 60-70%      | 0   | 0   | 0  | 0   | 1            | 500                               |
| Median Family Income 70-80%      | 2   | 96  | 0  | 0   | 1            | 400                               |
| Median Family Income 80-90%      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 90-100%     | 1   | 100   | 0  | 0   | 1            | 500                               |
| Median Family Income 100-110%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 110-120%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income >= 120%     | 1   | 100   | 1  | 165   | 9            | 4,227                             |
| Median Family Income Not Known   | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 5   | 326   | 2  | 415   | 12           | 5,627                             |
| <b>BRAZORIA COUNTY (039), TX</b> |   |   |  |   |              |                                   |
| MSA 26420                        |   |   |  |   |              |                                   |
| Inside AA 0005                   |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 2   | 152   | 1  | 239   | 1            | 704                               |
| Middle Income                    | 2   | 200   | 1  | 101   | 0            | 0                                 |
| Upper Income                     | 2   | 200   | 2  | 400   | 2            | 640                               |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 6   | 552   | 4  | 740   | 3            | 1,344                             |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics      | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item:<br>Loans by Affiliates |
|----------------------------------|---|---|--|---|--------------|-----------------------------------|
|                                  | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                     |
| <b>CHAMBERS COUNTY (071), TX</b> |   |   |  |   |              |                                   |
| MSA 26420                        |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 1   | 61  | 0  | 0   | 1            | 842                               |
| Middle Income                    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Upper Income                     | 0   | 0   | 0  | 0   | 1            | 1,000                             |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 1   | 61  | 0  | 0   | 2            | 1,842                             |
| <b>COLLIN COUNTY (085), TX</b>   |   |   |  |   |              |                                   |
| MSA 19124                        |   |   |  |   |              |                                   |
| Inside AA 0004                   |   |   |  |   |              |                                   |
| Median Family Income < 10%       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 10-20%      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 20-30%      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 30-40%      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 40-50%      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 50-60%      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 60-70%      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 70-80%      | 0   | 0   | 0  | 0   | 2            | 811                               |
| Median Family Income 80-90%      | 0   | 0   | 1  | 200   | 0            | 0                                 |
| Median Family Income 90-100%     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 100-110%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 110-120%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income >= 120%     | 0   | 0   | 2  | 438   | 2            | 1,113                             |
| Median Family Income Not Known   | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 0   | 0   | 3  | 638   | 4            | 1,924                             |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics      | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item:<br>Loans by Affiliates |
|----------------------------------|---|---|--|---|--------------|-----------------------------------|
|                                  | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                     |
| <b>COLORADO COUNTY (089), TX</b> |   |   |  |   |              |                                   |
| MSA NA                           |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                    | 0   | 0   | 0  | 2   | 1,726        | 1                                 |
| Upper Income                     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 0   | 0   | 0  | 2   | 1,726        | 1                                 |
| <b>COMAL COUNTY (091), TX</b>    |   |   |  |   |              |                                   |
| MSA 41700                        |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Upper Income                     | 0   | 0   | 0  | 1   | 400          | 1                                 |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 0   | 0   | 0  | 0   | 400          | 1                                 |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics    | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item: Loans by Affiliates |              |               |
|--------------------------------|---|---|--|---|--------------|--------------------------------|--------------|---------------|
|                                | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                  | Num of Loans | Amount (000s) |
| <b>DALLAS COUNTY (113), TX</b> |   |   |  |   |              |                                |              |               |
| MSA 19124                      |   |   |  |   |              |                                |              |               |
| Inside AA 0004                 |   |   |  |   |              |                                |              |               |
| Median Family Income < 10%     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 10-20%    | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 20-30%    | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 30-40%    | 1   | 100   | 0  | 0   | 2            | 1,002                          | 2            | 850           |
| Median Family Income 40-50%    | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 50-60%    | 0   | 0   | 1  | 150   | 0            | 0                              | 1            | 150           |
| Median Family Income 60-70%    | 0   | 0   | 1  | 200   | 0            | 0                              | 1            | 200           |
| Median Family Income 70-80%    | 0   | 0   | 0  | 0   | 1            | 306                            | 0            | 0             |
| Median Family Income 80-90%    | 1   | 91  | 0  | 0   | 0            | 0                              | 1            | 91            |
| Median Family Income 90-100%   | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 100-110%  | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 110-120%  | 0   | 0   | 0  | 0   | 1            | 850                            | 1            | 850           |
| Median Family Income >= 120%   | 1   | 100   | 2  | 400   | 3            | 1,800                          | 4            | 1,900         |
| Median Family Income Not Known | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Tract Not Known                | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| County Total                   | 3   | 291   | 4  | 750   | 7            | 3,958                          | 10           | 4,041         |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics    | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item:<br>Loans by Affiliates |
|--------------------------------|---|---|--|---|--------------|-----------------------------------|
|                                | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                     |
| <b>DENTON COUNTY (121), TX</b> |   |   |  |   |              |                                   |
| MSA 19124                      |   |   |  |   |              |                                   |
| Outside Assessment Area        |   |   |  |   |              |                                   |
| Median Family Income < 10%     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 10-20%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 20-30%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 30-40%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 40-50%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 50-60%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 60-70%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 70-80%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 80-90%    | 1   | 100   | 0  | 0   | 0            | 0                                 |
| Median Family Income 90-100%   | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 100-110%  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 110-120%  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income >= 120%   | 1   | 59  | 2  | 385   | 0            | 250                               |
| Median Family Income Not Known | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                   | 2   | 159   | 2  | 385   | 0            | 250                               |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics       | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item:<br>Loans by Affiliates |
|-----------------------------------|---|---|--|---|--------------|-----------------------------------|
|                                   | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                     |
| <b>FORT BEND COUNTY (157), TX</b> |   |   |  |   |              |                                   |
| MSA 26420                         |   |   |  |   |              |                                   |
| Outside Assessment Area           |   |   |  |   |              |                                   |
| Median Family Income < 10%        | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 10-20%       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 20-30%       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 30-40%       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 40-50%       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 50-60%       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 60-70%       | 0   | 0   | 1  | 155   | 0            | 0                                 |
| Median Family Income 70-80%       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 80-90%       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 90-100%      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 100-110%     | 2   | 195   | 4  | 625   | 2            | 711                               |
| Median Family Income 110-120%     | 1   | 50  | 0  | 0   | 0            | 1                                 |
| Median Family Income >= 120%      | 1   | 100   | 1  | 250   | 5            | 2,052                             |
| Median Family Income Not Known    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                   | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                      | 4   | 345   | 6  | 1,030   | 7            | 2,763                             |
| <b>GALVESTON COUNTY (167), TX</b> |   |   |  |   |              |                                   |
| MSA 26420                         |   |   |  |   |              |                                   |
| Outside Assessment Area           |   |   |  |   |              |                                   |
| Low Income                        | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                   | 0   | 0   | 0  | 0   | 1            | 263                               |
| Middle Income                     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Upper Income                      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                   | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                      | 0   | 0   | 0  | 0   | 1            | 263                               |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics      | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item:<br>Loans by Affiliates |
|----------------------------------|---|---|--|---|--------------|-----------------------------------|
|                                  | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                     |
| <b>GONZALES COUNTY (177), TX</b> |   |   |  |   |              |                                   |
| MSA NA                           |   |   |  |   |              |                                   |
| Inside AA 0006                   |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                    | 2   | 73  | 0  | 0   | 0            | 35                                |
| Upper Income                     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 2   | 73  | 0  | 0   | 0            | 35                                |
| <b>GRAYSON COUNTY (181), TX</b>  |   |   |  |   |              |                                   |
| MSA 43300                        |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Upper Income                     | 1   | 100   | 0  | 0   | 0            | 100                               |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 1   | 100   | 0  | 0   | 0            | 100                               |
| <b>GRIMES COUNTY (185), TX</b>   |   |   |  |   |              |                                   |
| MSA NA                           |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                    | 1   | 65  | 0  | 0   | 0            | 0                                 |
| Upper Income                     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 1   | 65  | 0  | 0   | 0            | 0                                 |

## Loans by County

Respondent ID: 0003630323

## Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics    | Loan Amount at Origination <=\$100,000 |               | Loan Amount at Origination >\$100,000 But <=\$250,000 |               | Loan Amount at Origination >\$250,000 |               | Loans to Businesses with Gross Annual Revenues <= \$1 Million |               | Memo Item: Loans by Affiliates |               |
|--------------------------------|--|---------------|---|---------------|---------------------------------------|---------------|---|---------------|--------------------------------|---------------|
|                                | Num of Loans                           | Amount (000s) | Num of Loans  | Amount (000s) | Num of Loans                          | Amount (000s) | Num of Loans  | Amount (000s) | Num of Loans                   | Amount (000s) |
| <b>HARDIN COUNTY (199), TX</b> |  |               |   |               |                                       |               |   |               |                                |               |
| <b>MSA 13140</b>               |  |               |   |               |                                       |               |   |               |                                |               |
| <b>Inside AA 0002</b>          |  |               |   |               |                                       |               |   |               |                                |               |
| Low Income                     | 0                                      | 0             | 0   | 0             | 0                                     | 0             | 0   | 0             | 0                              | 0             |
| Moderate Income                | 0                                      | 0             | 0   | 0             | 0                                     | 0             | 0   | 0             | 0                              | 0             |
| Middle Income                  | 1                                      | 88            | 0   | 0             | 2                                     | 1,750         | 0   | 0             | 0                              | 0             |
| Upper Income                   | 6                                      | 413           | 2   | 337           | 3                                     | 1,738         | 7   | 956           | 0                              | 0             |
| Income Not Known               | 0                                      | 0             | 0   | 0             | 0                                     | 0             | 0   | 0             | 0                              | 0             |
| Tract Not Known                | 0                                      | 0             | 0   | 0             | 0                                     | 0             | 0   | 0             | 0                              | 0             |
| County Total                   | 7                                      | 501           | 2   | 337           | 5                                     | 3,488         | 7   | 956           | 0                              | 0             |
| <b>HARRIS COUNTY (201), TX</b> |  |               |   |               |                                       |               |   |               |                                |               |
| <b>MSA 26420</b>               |  |               |   |               |                                       |               |   |               |                                |               |
| <b>Inside AA 0005</b>          |  |               |   |               |                                       |               |   |               |                                |               |
| Median Family Income < 10%     | 0                                      | 0             | 0   | 0             | 0                                     | 0             | 0   | 0             | 0                              | 0             |
| Median Family Income 10-20%    | 0                                      | 0             | 0   | 0             | 0                                     | 0             | 0   | 0             | 0                              | 0             |
| Median Family Income 20-30%    | 1                                      | 94            | 0   | 0             | 0                                     | 0             | 0   | 0             | 0                              | 0             |
| Median Family Income 30-40%    | 1                                      | 100           | 2   | 400           | 6                                     | 4,653         | 2   | 1,628         | 0                              | 0             |
| Median Family Income 40-50%    | 1                                      | 15            | 2   | 350           | 5                                     | 2,045         | 0   | 0             | 0                              | 0             |
| Median Family Income 50-60%    | 1                                      | 60            | 4   | 764           | 6                                     | 3,680         | 1   | 500           | 0                              | 0             |
| Median Family Income 60-70%    | 1                                      | 20            | 1   | 204           | 4                                     | 1,800         | 1   | 350           | 0                              | 0             |
| Median Family Income 70-80%    | 3                                      | 185           | 4   | 698           | 4                                     | 2,050         | 4   | 873           | 0                              | 0             |
| Median Family Income 80-90%    | 4                                      | 305           | 1   | 240           | 1                                     | 400           | 1   | 400           | 0                              | 0             |
| Median Family Income 90-100%   | 0                                      | 0             | 0   | 0             | 2                                     | 1,571         | 1   | 571           | 0                              | 0             |
| Median Family Income 100-110%  | 2                                      | 195           | 2   | 482           | 5                                     | 2,462         | 0   | 0             | 0                              | 0             |
| Median Family Income 110-120%  | 2                                      | 200           | 4   | 775           | 1                                     | 261           | 4   | 761           | 0                              | 0             |
| Median Family Income >= 120%   | 17                                     | 1,088         | 15  | 2,726         | 23                                    | 12,332        | 33  | 11,863        | 0                              | 0             |
| Median Family Income Not Known | 0                                      | 0             | 0   | 0             | 2                                     | 1,349         | 1   | 349           | 0                              | 0             |
| Tract Not Known                | 0                                      | 0             | 0   | 0             | 0                                     | 0             | 0   | 0             | 0                              | 0             |
| County Total                   | 33                                     | 2,262         | 35  | 6,639         | 59                                    | 32,603        | 48  | 17,295        | 0                              | 0             |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics      | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item:<br>Loans by Affiliates |
|----------------------------------|---|---|--|---|--------------|-----------------------------------|
|                                  | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                     |
| <b>HARRISON COUNTY (203), TX</b> |   |   |  |   |              |                                   |
| MSA 30980                        |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                    | 0   | 0   | 1  | 184   | 0            | 0                                 |
| Upper Income                     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 0   | 0   | 1  | 184   | 0            | 0                                 |
| <b>HAYS COUNTY (209), TX</b>     |   |   |  |   |              |                                   |
| MSA 12420                        |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 0   | 491          | 0                                 |
| Middle Income                    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Upper Income                     | 1   | 100   | 0  | 0   | 0            | 0                                 |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 1   | 100   | 0  | 0   | 491          | 0                                 |
| <b>JASPER COUNTY (241), TX</b>   |   |   |  |   |              |                                   |
| MSA NA                           |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                    | 0   | 0   | 1  | 232   | 2            | 1,300                             |
| Upper Income                     | 1   | 100   | 1  | 120   | 2            | 1,279                             |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 1   | 100   | 2  | 352   | 4            | 2,579                             |
|                                  |   |   |  |   | 4            | 1,499                             |
|                                  |   |   |  |   |              | 0                                 |
|                                  |   |   |  |   |              | 0                                 |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics       | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item: Loans by Affiliates |              |               |
|-----------------------------------|---|---|--|---|--------------|--------------------------------|--------------|---------------|
|                                   | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                  | Num of Loans | Amount (000s) |
| <b>JEFFERSON COUNTY (245), TX</b> |   |   |  |   |              |                                |              |               |
| MSA 13140                         |   |   |  |   |              |                                |              |               |
| Inside AA 0002                    |   |   |  |   |              |                                |              |               |
| Low Income                        | 0   | 0   | 2  | 280   | 1            | 486                            | 0            | 0             |
| Moderate Income                   | 10  | 636   | 4  | 850   | 12           | 6,526                          | 8            | 2,026         |
| Middle Income                     | 4   | 274   | 4  | 834   | 1            | 572                            | 5            | 583           |
| Upper Income                      | 18  | 1,024   | 7  | 1,148   | 15           | 8,238                          | 17           | 3,230         |
| Income Not Known                  | 2   | 150   | 2  | 300   | 3            | 2,190                          | 2            | 200           |
| Tract Not Known                   | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| County Total                      | 34  | 2,084   | 19                                       | 3,412   | 32           | 18,012                         | 32           | 6,039         |
| <b>JOHNSON COUNTY (251), TX</b>   |   |   |  |   |              |                                |              |               |
| MSA 23104                         |   |   |  |   |              |                                |              |               |
| Outside Assessment Area           |   |   |  |   |              |                                |              |               |
| Low Income                        | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Moderate Income                   | 0   | 0   | 0  | 0   | 1            | 500                            | 0            | 0             |
| Middle Income                     | 1   | 66  | 0  | 0   | 0            | 0                              | 0            | 0             |
| Upper Income                      | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Income Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Tract Not Known                   | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| County Total                      | 1   | 66  | 0  | 0   | 1            | 500                            | 0            | 0             |
| <b>LIBERTY COUNTY (291), TX</b>   |   |   |  |   |              |                                |              |               |
| MSA 26420                         |   |   |  |   |              |                                |              |               |
| Outside Assessment Area           |   |   |  |   |              |                                |              |               |
| Low Income                        | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Moderate Income                   | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Middle Income                     | 0   | 0   | 1  | 248   | 1            | 500                            | 1            | 248           |
| Upper Income                      | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Income Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Tract Not Known                   | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| County Total                      | 0   | 0   | 1  | 248   | 1            | 500                            | 1            | 248           |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics        | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item: Loans by Affiliates |              |               |
|------------------------------------|---|---|--|---|--------------|--------------------------------|--------------|---------------|
|                                    | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                  | Num of Loans | Amount (000s) |
| <b>MONTGOMERY COUNTY (339), TX</b> |   |   |  |   |              |                                |              |               |
| MSA 26420                          |   |   |  |   |              |                                |              |               |
| Inside AA 0005                     |   |   |  |   |              |                                |              |               |
| Median Family Income < 10%         | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 10-20%        | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 20-30%        | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 30-40%        | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 40-50%        | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 50-60%        | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 60-70%        | 1   | 31  | 2  | 222   | 2            | 945                            | 3            | 637           |
| Median Family Income 70-80%        | 0   | 0   | 0  | 0   | 1            | 500                            | 0            | 0             |
| Median Family Income 80-90%        | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 90-100%       | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 100-110%      | 2   | 122   | 4  | 549   | 1            | 259                            | 1            | 158           |
| Median Family Income 110-120%      | 1   | 45  | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income >= 120%       | 6   | 419   | 3  | 600   | 6            | 2,813                          | 10           | 2,128         |
| Median Family Income Not Known     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Tract Not Known                    | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| County Total                       | 10  | 617   | 9  | 1,371   | 10           | 4,517                          | 14           | 2,923         |
| <b>NUECES COUNTY (355), TX</b>     |   |   |  |   |              |                                |              |               |
| MSA 18580                          |   |   |  |   |              |                                |              |               |
| Outside Assessment Area            |   |   |  |   |              |                                |              |               |
| Low Income                         | 0   | 0   | 1  | 250   | 0            | 0                              | 1            | 250           |
| Moderate Income                    | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Middle Income                      | 0   | 0   | 1  | 187   | 0            | 0                              | 0            | 0             |
| Upper Income                       | 0   | 0   | 0  | 0   | 1            | 413                            | 1            | 413           |
| Income Not Known                   | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Tract Not Known                    | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| County Total                       | 0   | 0   | 2  | 437   | 1            | 413                            | 2            | 663           |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics    | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item: Loans by Affiliates |              |               |
|--------------------------------|---|---|--|---|--------------|--------------------------------|--------------|---------------|
|                                | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                  | Num of Loans | Amount (000s) |
| <b>ORANGE COUNTY (361), TX</b> |   |   |  |   |              |                                |              |               |
| MSA 13140                      |   |   |  |   |              |                                |              |               |
| Inside AA 0002                 |   |   |  |   |              |                                |              |               |
| Low Income                     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Moderate Income                | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Middle Income                  | 1   | 45  | 1  | 122   | 0            | 0                              | 0            | 0             |
| Upper Income                   | 1   | 75  | 5  | 929   | 2            | 800                            | 3            | 600           |
| Income Not Known               | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Tract Not Known                | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| County Total                   | 2   | 120   | 6  | 1,051   | 2            | 800                            | 3            | 600           |
| <b>PARKER COUNTY (367), TX</b> |   |   |  |   |              |                                |              |               |
| MSA 23104                      |   |   |  |   |              |                                |              |               |
| Outside Assessment Area        |   |   |  |   |              |                                |              |               |
| Low Income                     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Moderate Income                | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Middle Income                  | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Upper Income                   | 0   | 0   | 0  | 0   | 1            | 998                            | 0            | 0             |
| Income Not Known               | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Tract Not Known                | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| County Total                   | 0   | 0   | 0  | 0   | 1            | 998                            | 0            | 0             |
| <b>SABINE COUNTY (403), TX</b> |   |   |  |   |              |                                |              |               |
| MSA NA                         |   |   |  |   |              |                                |              |               |
| Outside Assessment Area        |   |   |  |   |              |                                |              |               |
| Low Income                     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Moderate Income                | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Middle Income                  | 1   | 24  | 0  | 0   | 0            | 1                              | 24           | 0             |
| Upper Income                   | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Income Not Known               | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Tract Not Known                | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| County Total                   | 1   | 24  | 0  | 0   | 0            | 1                              | 24           | 0             |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics     | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item: Loans by Affiliates |              |               |
|---------------------------------|---|---|--|---|--------------|--------------------------------|--------------|---------------|
|                                 | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                  | Num of Loans | Amount (000s) |
| <b>TARRANT COUNTY (439), TX</b> |   |   |  |   |              |                                |              |               |
| MSA 23104                       |   |   |  |   |              |                                |              |               |
| Inside AA 0004                  |   |   |  |   |              |                                |              |               |
| Median Family Income < 10%      | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 10-20%     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 20-30%     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 30-40%     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 40-50%     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 50-60%     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 60-70%     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 70-80%     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 80-90%     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 90-100%    | 0   | 0   | 0  | 1   | 800          | 0                              | 0            | 0             |
| Median Family Income 100-110%   | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income 110-120%   | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Median Family Income >= 120%    | 4   | 269   | 0  | 0   | 4            | 1,400                          | 3            | 629           |
| Median Family Income Not Known  | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Tract Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| County Total                    | 4   | 269   | 0  | 0   | 5            | 2,200                          | 3            | 629           |
| <b>TAYLOR COUNTY (441), TX</b>  |   |   |  |   |              |                                |              |               |
| MSA 10180                       |   |   |  |   |              |                                |              |               |
| Outside Assessment Area         |   |   |  |   |              |                                |              |               |
| Low Income                      | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Moderate Income                 | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Middle Income                   | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Upper Income                    | 1   | 100   | 0  | 0   | 0            | 1                              | 100          | 0             |
| Income Not Known                | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Tract Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| County Total                    | 1   | 100   | 0  | 0   | 0            | 0                              | 1            | 100           |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics    | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item:<br>Loans by Affiliates |
|--------------------------------|---|---|--|---|--------------|-----------------------------------|
|                                | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                     |
| <b>TRAVIS COUNTY (453), TX</b> |   |   |  |   |              |                                   |
| MSA 12420                      |   |   |  |   |              |                                   |
| Inside AA 0001                 |   |   |  |   |              |                                   |
| Median Family Income < 10%     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 10-20%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 20-30%    | 0   | 0   | 0  | 1   | 520          | 0                                 |
| Median Family Income 30-40%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 40-50%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 50-60%    | 1   | 100   | 0  | 0   | 0            | 0                                 |
| Median Family Income 60-70%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 70-80%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 80-90%    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 90-100%   | 0   | 0   | 0  | 1   | 1,000        | 0                                 |
| Median Family Income 100-110%  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 110-120%  | 0   | 0   | 0  | 3   | 1,257        | 1                                 |
| Median Family Income >= 120%   | 3   | 260   | 4  | 810   | 2            | 969                               |
| Median Family Income Not Known | 1   | 100   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                   | 5   | 460   | 4  | 810   | 7            | 3,746                             |
| <b>TYLER COUNTY (457), TX</b>  |   |   |  |   |              |                                   |
| MSA NA                         |   |   |  |   |              |                                   |
| Outside Assessment Area        |   |   |  |   |              |                                   |
| Low Income                     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                | 0   | 0   | 1  | 140   | 0            | 0                                 |
| Middle Income                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Upper Income                   | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known               | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                   | 0   | 0   | 1  | 140   | 0            | 0                                 |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics      | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item:<br>Loans by Affiliates |
|----------------------------------|---|---|--|---|--------------|-----------------------------------|
|                                  | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                     |
| <b>VICTORIA COUNTY (469), TX</b> |   |   |  |   |              |                                   |
| MSA 47020                        |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                    | 0   | 0   | 0  | 1   | 500          | 1                                 |
| Upper Income                     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 0   | 0   | 0  | 1   | 500          | 1                                 |
| <b>WALKER COUNTY (471), TX</b>   |   |   |  |   |              |                                   |
| MSA NA                           |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                    | 1   | 88  | 0  | 0   | 0            | 1                                 |
| Upper Income                     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 1   | 88  | 0  | 0   | 0            | 1                                 |
| <b>WALLER COUNTY (473), TX</b>   |   |   |  |   |              |                                   |
| MSA 26420                        |   |   |  |   |              |                                   |
| Outside Assessment Area          |   |   |  |   |              |                                   |
| Low Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Moderate Income                  | 0   | 0   | 0  | 1   | 500          | 1                                 |
| Middle Income                    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Upper Income                     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known                 | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                     | 0   | 0   | 0  | 1   | 500          | 1                                 |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics        | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item:<br>Loans by Affiliates |
|------------------------------------|---|---|--|---|--------------|-----------------------------------|
|                                    | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                     |
| <b>WILLACY COUNTY (489), TX</b>    |   |   |  |   |              |                                   |
| MSA NA                             |   |   |  |   |              |                                   |
| Outside Assessment Area            |   |   |  |   |              |                                   |
| Low Income                         | 1   | 25  | 0  | 0   | 0            | 0                                 |
| Moderate Income                    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Middle Income                      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Upper Income                       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Income Not Known                   | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                       | 1   | 25  | 0  | 0   | 0            | 0                                 |
| <b>WILLIAMSON COUNTY (491), TX</b> |   |   |  |   |              |                                   |
| MSA 12420                          |   |   |  |   |              |                                   |
| Inside AA 0001                     |   |   |  |   |              |                                   |
| Median Family Income < 10%         | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 10-20%        | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 20-30%        | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 30-40%        | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 40-50%        | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 50-60%        | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 60-70%        | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 70-80%        | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 80-90%        | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 90-100%       | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income 100-110%      | 0   | 0   | 0  | 1   | 255          | 0                                 |
| Median Family Income 110-120%      | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Median Family Income >= 120%       | 1   | 100   | 0  | 0   | 0            | 100                               |
| Median Family Income Not Known     | 0   | 0   | 0  | 0   | 0            | 0                                 |
| Tract Not Known                    | 0   | 0   | 0  | 0   | 0            | 0                                 |
| County Total                       | 1   | 100   | 0  | 0   | 1            | 255                               |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: TEXAS (48)

| Area Income Characteristics      | Loan Amount at<br>Origination<br><=\$100,000 | Loan Amount at<br>Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at<br>Origination<br>>\$250,000 | Loans to Businesses<br>with Gross Annual<br>Revenues <= \$1<br>Million |                 | Memo Item:<br>Loans by<br>Affiliates |
|----------------------------------|--|--|---|--|-----------------|--------------------------------------|
|                                  | Num of<br>Loans                              | Amount<br>(000s)   | Num of<br>Loans                             | Amount<br>(000s)   | Num of<br>Loans | Amount<br>(000s)                     |
| <b>WILSON COUNTY (493), TX</b>   |  |  |   |  |                 |                                      |
| MSA 41700                        |  |  |   |  |                 |                                      |
| Inside AA 0007                   |  |  |   |  |                 |                                      |
| Low Income                       | 0  | 0  | 0   | 0  | 0               | 0                                    |
| Moderate Income                  | 0  | 0  | 0   | 0  | 0               | 0                                    |
| Middle Income                    | 0  | 0  | 0   | 0  | 0               | 0                                    |
| Upper Income                     | 2  | 26   | 0   | 0  | 1               | 375                                  |
| Income Not Known                 | 0  | 0  | 0   | 0  | 0               | 0                                    |
| Tract Not Known                  | 0  | 0  | 0   | 0  | 0               | 0                                    |
| County Total                     | 2  | 26   | 0   | 0  | 1               | 375                                  |
| <b>TOTAL INSIDE AA IN STATE</b>  | <b>114</b>                                   | <b>7,681</b>   | <b>88</b>                                   | <b>16,163</b>  | <b>148</b>      | <b>78,849</b>                        |
| <b>TOTAL OUTSIDE AA IN STATE</b> | <b>16</b>                                    | <b>1,233</b>   | <b>16</b>                                   | <b>2,891</b>   | <b>25</b>       | <b>14,375</b>                        |
| <b>STATE TOTAL</b>               | <b>130</b>                                   | <b>8,914</b>   | <b>104</b>                                  | <b>19,054</b>  | <b>173</b>      | <b>93,224</b>                        |
|                                  |  |  |   |  | <b>163</b>      | <b>47,098</b>                        |
|                                  |  |  |   |  |                 | <b>0</b>                             |
|                                  |  |  |   |  |                 | <b>0</b>                             |

Loans by County

Respondent ID: 0003630323

Small Business Loans - Originations

Agency: FRS - 2

Institution: Third Coast Bank

State: UTAH (49)

| Area Income Characteristics       | Loan Amount at Origination<br><=\$100,000 | Loan Amount at Origination<br>>\$100,000 But<br><=\$250,000 | Loan Amount at Origination<br>>\$250,000 | Loans to Businesses with Gross Annual Revenues <= \$1 Million |              | Memo Item: Loans by Affiliates |              |               |
|-----------------------------------|---|---|--|---|--------------|--------------------------------|--------------|---------------|
|                                   | Num of Loans                              | Amount (000s)   | Num of Loans                             | Amount (000s)   | Num of Loans | Amount (000s)                  | Num of Loans | Amount (000s) |
| <b>WEBER COUNTY (057), UT</b>     |   |   |  |   |              |                                |              |               |
| MSA 36260                         |   |   |  |   |              |                                |              |               |
| Outside Assessment Area           |   |   |  |   |              |                                |              |               |
| Low Income                        | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Moderate Income                   | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Middle Income                     | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Upper Income                      | 0   | 0   | 0  | 0   | 1            | 552                            | 1            | 552           |
| Income Not Known                  | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| Tract Not Known                   | 0   | 0   | 0  | 0   | 0            | 0                              | 0            | 0             |
| County Total                      | 0   | 0   | 0  | 0   | 1            | 552                            | 1            | 552           |
| <b>TOTAL INSIDE AA IN STATE</b>   | <b>0</b>                                  | <b>0</b>  | <b>0</b>                                 | <b>0</b>  | <b>0</b>     | <b>0</b>                       | <b>0</b>     | <b>0</b>      |
| <b>TOTAL OUTSIDE AA IN STATE</b>  | <b>0</b>                                  | <b>0</b>  | <b>0</b>                                 | <b>0</b>  | <b>1</b>     | <b>552</b>                     | <b>1</b>     | <b>552</b>    |
| <b>STATE TOTAL</b>                | <b>0</b>                                  | <b>0</b>  | <b>0</b>                                 | <b>0</b>  | <b>1</b>     | <b>552</b>                     | <b>1</b>     | <b>552</b>    |
| <b>TOTAL ACROSS ALL STATES</b>    |   |   |  |   |              |                                |              |               |
| <b>TOTAL INSIDE AA</b>            | <b>114</b>                                | <b>7,681</b>  | <b>88</b>                                | <b>16,163</b>   | <b>148</b>   | <b>78,849</b>                  | <b>133</b>   | <b>37,109</b> |
| <b>TOTAL OUTSIDE AA</b>           | <b>18</b>                                 | <b>1,433</b>  | <b>17</b>                                | <b>3,111</b>  | <b>30</b>    | <b>17,027</b>                  | <b>35</b>    | <b>11,893</b> |
| <b>TOTAL INSIDE &amp; OUTSIDE</b> | <b>132</b>                                | <b>9,114</b>  | <b>105</b>                               | <b>19,274</b>   | <b>178</b>   | <b>95,876</b>                  | <b>168</b>   | <b>49,002</b> |



## **CRA Disclosure Statement Notice**

The CRA Disclosure Statement pertaining to the bank, its [operations subsidiaries or operating subsidiaries], and its other affiliates, if applicable, may be obtained on the Federal Financial Institutions Examination Council's (FFIEC) website at: <https://www.ffiec.gov>.



## **Home Mortgage Disclosure Act Notice**

The HDMA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials. HMDA data for many other financial institutions are also available online.

For more information, visit the Consumer Financial Protection Bureau's website:  
[www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda).



## **Merger Disclosure Statement Notice**

Effective February 1, 2026, Third Coast Bank legally merged with Keystone Bank, with Third Coast Bank as the surviving institution. In accordance with CRA requirements, Third Coast Bank maintains this public file, which includes historical CRA public file materials for Keystone Bank.



# KEYSTONE BANK

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## COMMUNITY REINVESTMENT ACT PUBLIC FILE

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2025



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1. Written Comments from the Public
2. CRA Performance Evaluations (Completed 2023)
3. Branch Locations and Hours of Operations
4. Products/Services List and Schedule of Fees
5. Loan to Deposit Ratios
6. Assessment Area Maps and Descriptions
7. HMDA Disclosure Statement



## WRITTEN PUBLIC COMMENTS



Rebecca Creek Distillery is named after Rebecca Creek, a creek that runs through the Texas Hill Country known for its pure, limestone filtered water. We strive to artfully distill exceptional whiskey and vodka rooted in tradition and innovation. At Rebecca Creek Distillery, we invite you to savor the artistry in every sip, as we continue our journey of crafting exceptional spirits that stand as a testament to our unwavering commitment to excellence, innovation, and the joy of shared moments.

### Goals:

We dream of becoming the largest whiskey distillery in Texas. With an unwavering commitment to quality and innovation, we aim to expand our footprint across the state of Texas, sharing the essence of our craft with enthusiasts and connoisseurs alike. We hope to expand our current distillery location in order to provide more opportunity for live music, special events, and entertaining. We are excited for the future and all of the opportunity it will bring!

### Solutions:

Keystone has helped to provide funding so that we could purchase our property (as opposed to renting), and to fund new projects like our Spanish Oak Double Barrel Whiskey, Bottled in Bond, and 16 year old bourbon.

We also saw a significant decrease in our monthly account fees when we transitioned to Keystone treasury management from our previous banking relationship.



# ATREYU

Founded in 2020 by Austin, TX resident Michael Krajicek, with the help of his big brother (and Kasasa fintech CEO) Gabriel, Atreyu is a performance footwear company that makes simple, functional, and intentionally designed running shoes for all athletes. Atreyu proudly offers a lineup of four essential running shoes. They are committed to developing products that “Honor simplicity.”

Atreyu enjoys contributing shoes to local organizations including, but not limited to, the Police Activities League (PAL), Born to Run (a youth training team under Austin’s running scene curator, Paul Carrozza), and the Austin Fire Department (Cadets training program).

#### Challenges:

As a self-funded startup, Atreyu has faced the many challenges of growing a business from the ground up. The most difficult task is to manage a multi-month cash conversion cycle on pre-purchased inventory (produced in Asia) before the company can sell and ship the product to customers. Keystone Bank has been a crucial partner in their ability to help fund and scale inventory demand with a line of credit to bridge the gap during the manufacturing process.

#### Goals:

Atreyu is eager to earn a strong foothold in the running space and become synonymous with high performance, clean design, and their signature no nonsense approach to the running industry. Atreyu’s obsession is to create a brand and products that deliver “Everything you need, and nothing you don’t.” Why? Because honoring simplicity and hard work is the key to success.

#### Solutions:

By offering a line of credit to bridge gaps during manufacturing, Keystone Bank has been an essential collaborator in funding and expanding inventory demand.



Founded in 2017, LeRoy and Lewis Barbecue operates two food trucks serving the Austin market. They are dedicated to serving their community by making excellent, inventive barbecue. Dubbed "New School Barbecue", LeRoy and Lewis prides itself on supporting local ranches by sourcing all of their meat from small, responsible purveyors in Texas. In addition to their food trucks, they also provide full services catering and event planning.

LeRoy and Lewis also believe "BBQ is about sharing". In addition to offering weekly online how-to courses, they host a bi-annual "New School BBQ University", a weekend with the pitmaster and team who share their smoking secrets and unique recipes. Over 3 days, learn how to trim, season, and smoke all of the menu items. The event also features educational panels on starting up a small business and developing marketing plans.

#### Challenges:

Running a restaurant is not without its challenges. Like the rest of the country, LeRoy and Lewis had to weather through the unprecedented pandemic which put a strain on business operations and cash flow. Keystone Bank assisted them with their PPP funding to stay operational and continue to provide their inventive barbecue to their community.

#### Goals:

Stay operational during pandemic  
Start up their second food truck (Mama Fried)  
Open a brick and mortar restaurant

#### Solutions:

Keystone Bank assisted in providing PPP funding  
Keystone Bank provides operating accounts providing easy access to funds  
Keystone is looking forward to assist LeRoy and Lewis with their future endeavors

## **PUBLIC DISCLOSURE**

February 6, 2023

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Keystone Bank, SSB  
Certificate Number: 34456

11500 Bee Caves Road  
Austin, Texas 78738

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Dallas Regional Office

600 North Pearl Street, Suite 700  
Dallas, Texas 75201

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## INSTITUTION RATING

### INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment areas, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

### The Lending Test is rated **Satisfactory**.

- The loan-to-deposit ratio is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and assessment area credit needs.
- A majority of loans are in the institution's assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects, given the demographics of the assessment areas, poor penetration among individuals of different income levels (including low- and moderate-income) and businesses and farms of different sizes.
- The institution did not receive any complaints regarding its Community Reinvestment Act (CRA) performance since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

### The Community Development Test is rated **Outstanding**.

The institution's community development performance demonstrates excellent responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas. In addition, examiners considered the limited time during the review period for which the bank was subject to community development requirements under the Community Development Test. Excellent responsiveness to the community development needs and an excellent record regarding community development loans, without simply ignoring the other types of community development activities, support this conclusion. The bank also demonstrated an excellent record regarding its community development services and a poor record regarding its qualified investments.

## DESCRIPTION OF INSTITUTION

Keystone Bank, SSB is headquartered in Austin, Texas and is solely owned by Keystone Bancshares, Inc., Austin, Texas, a one-bank holding company. The institution received a Satisfactory rating at its previous Office of the Comptroller of the Currency Performance Evaluation, dated July 2, 2018, based on Interagency Small Institution CRA Examination Procedures. The bank became an Intermediate Small Bank effective January 1, 2023.

Keystone Bank, SSB acquired Ballinger National Bank in May of 2019, and converted its charter from a national banking association to a Texas state savings bank in March of 2021. The institution operates three full-service offices in Texas. Since the previous evaluation, the bank did not open any branches, but closed one branch in Austin, Texas.

With a primary focus on commercial lending, Keystone Bank, SSB offers a wide variety of loan products including commercial, agricultural, home mortgage, and consumer loans. Additionally, Keystone Bank, SSB generated 1,084 Small Business Administration (SBA) Paycheck Protection Program loans totaling \$126.2 million during 2020 and 2021, of which 827 loans totaling \$107.4 million were originated within the institution's assessment areas. The institution also offers multiple deposit products including checking, savings, and money market accounts, and certificates of deposit. Alternative banking services include internet and mobile banking, electronic bill pay, and two automated teller machines (ATM).

As of September 30, 2022, the institution reported total assets of \$758.9 million, total loans of \$560.7 million, and total deposits of \$675.9 million. As reflected in the following table, the major loan products include commercial loans comprising 57.9 percent of the loan portfolio and home mortgage loans comprising 25.2 percent.

| Loan Portfolio Distribution as of 9/30/2022                 |                |              |
|---|----------------|--------------|
| Loan Category   | \$(000s)       | %            |
| Construction, Land Development, and Other Land Loans        | 88,429         | 15.8         |
| Secured by Farmland   | 3,039          | 0.5          |
| Secured by 1-4 Family Residential Properties                | 122,496        | 21.8         |
| Secured by Multifamily (5 or more) Residential Properties   | 18,802         | 3.4          |
| Secured by Nonfarm Nonresidential Properties                | 224,591        | 40.1         |
| <b>Total Real Estate Loans</b>                              | <b>457,357</b> | <b>81.6</b>  |
| Commercial and Industrial Loans                             | 99,620         | 17.8         |
| Agricultural Production and Other Loans to Farmers          | 1,832          | 0.3          |
| Consumer Loans  | 1,543          | 0.3          |
| Obligations of State and Political Subdivisions in the U.S. | 35             | <0.1         |
| Other Loans   | 272            | <0.1         |
| Lease Financing Receivable (net of unearned income)         | 0              | 0.0          |
| Less: Unearned Income                                       | 0              | 0.0          |
| <b>Total Loans</b>  | <b>560,659</b> | <b>100.0</b> |

Source: Reports of Condition and Income

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet its assessment areas' credit needs.

## DESCRIPTION OF ASSESSMENT AREAS

Keystone Bank, SSB designated two assessment areas in Texas consisting of the Austin Metropolitan Statistical Area (MSA) Assessment Area (Austin MSA AA) and the Texas Non-MSA Assessment Area (Texas Non-MSA AA). Based on the 2020 U.S. Census, the assessment areas contained 294 total census tracts with the following income designations: 24 low-, 72 moderate-, 82 middle-, 100 upper-income tracts, and 16 non-designated income tracts. None of the census tracts received distressed or underserved designations during the review period; however, the Federal Emergency Management Agency (FEMA) made four major disaster declarations involving the assessment areas during the review period.

The assessment areas conform to the CRA regulatory requirements. This evaluation contains detailed information regarding each assessment area in the applicable Description of Institution's Operations sections.

## SCOPE OF EVALUATION

### General Information

This evaluation covers the period from July 2, 2018, to the current evaluation dated February 6, 2023. Examiners used Interagency Intermediate Small Institution Examination Procedures to evaluate the bank's performance. These procedures include two tests: Lending Test and Community Development Test. Refer to the Appendices for information on each test.

As previously noted, the bank operates in two separate assessment areas throughout Texas. The following table shows that the Austin MSA AA generated a substantial majority of the bank's loans, garnered the largest percentage of its deposits, and contained a majority of its offices. Consequently, examiners applied full-scope procedures to and placed the greatest weight on the bank's performance in the Austin MSA AA. Examiners applied limited-scope procedures to the Texas Non-MSA AA. Examiners generally weighed each area consistent with that area's overall lending level.

| Assessment Area Breakdown of Loans, Deposits, and Branches |                |              |                |              |          |              |
|--|----------------|--------------|----------------|--------------|----------|--------------|
| Assessment Area  | Loans          |              | Deposits       |              | Branches |              |
|  | \$             | %            | \$             | %            | #        | %            |
| Austin MSA AA  | 129,303        | 97.5         | 567,135        | 91.4         | 2        | 66.7         |
| Texas Non-MSA AA   | 3,368          | 2.5          | 53,456         | 8.6          | 1        | 33.3         |
| <b>Total</b>   | <b>132,671</b> | <b>100.0</b> | <b>620,591</b> | <b>100.0</b> | <b>3</b> | <b>100.0</b> |

Source: Bank Data; FDIC Summary of Deposits (06/30/2022)

## **Activities Reviewed**

Based on the bank's business strategy, assessment areas' credit needs, and the number and dollar volume of loans originated during the evaluation period, examiners determined that small business loans and home mortgage loans represented the bank's major product lines. For the assessment area concentration review, examiners determined sufficient readily available data existed to evaluate the universes of 130 small business loans totaling \$45.5 million, and 85 home mortgage loans totaling nearly \$115.5 million, originated between January 1, 2022, and December 31, 2022.

Examiners reviewed the universes of small business and home mortgage loans within the Austin MSA AA to evaluate the geographic loan distribution record in such assessment area. Examiners selected a sample of 47 small business loans totaling \$19.6 million and 45 home mortgage loans totaling \$76.5 million in the Austin MSA AA to evaluate the bank's borrower profile performance in such assessment area. The 2022 D&B data provided a standard of comparison for the small business loans reviewed, and the 2020 U.S. Census data provided a standard of comparison for the home mortgage loans reviewed.

Due to the limited number of small business and home mortgage loans originated in the Texas Non-MSA AA and the bank's focus on small farm lending in the Texas Non-MSA AA, examiners conducted the geographic distribution and borrower profile reviews for such assessment area based on small farm lending. Examiners reviewed the entire universe of 16 small farm loans originated in 2022 and inside the Texas Non-MSA AA totaling \$2.0 million. The 2022 D&B data provided a standard of comparison for the small farm loans reviewed.

Small business lending received more weight than home mortgage lending when drawing applicable conclusions since commercial loans represent the institution's largest credit product and the bank's primary business focus. Furthermore, while examiners reviewed both the number and dollar volume of loans and presented both figures throughout the evaluation, examiners emphasized performance by number of loans when conducting the geographic distribution and borrower profile analyses since the number of loans are a better indicator of geographies, businesses, farms, and individuals served.

For the Community Development Test, examiners reviewed bank provided data on community development loans, qualified investments, and community development services since the prior CRA evaluation dated July 2, 2018.

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **LENDING TEST**

Keystone Bank, SSB demonstrated satisfactory performance under the Lending Test. Reasonable performances under the loan-to-deposit ratio, assessment area concentration, and geographic distribution criteria primarily support this conclusion. The bank demonstrated a poor record regarding its borrower profile distribution.

## **Loan-to-Deposit Ratio**

The loan-to-deposit ratio is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and assessment area credit needs. For the past 17 quarters since the previous evaluation dated July 2, 2018, the bank recorded a 75.6 percent average loan-to-deposit ratio. From September 30, 2018, to September 30, 2022, the ratio varied with a range from a low of 43.9 and a high of 100.4 percent.

Examiners compared Keystone Bank, SSB's average net loan-to-deposit ratio to three other financial institutions. Examiners selected the comparable institutions based on their asset size, geographic location, and lending focus. As shown in the following table, Keystone Bank, SBB's average net loan-to-deposit is comparable to the similarly situated institutions.

| <b>Loan-to-Deposit (LTD) Ratio Comparison</b>   |  |  |
|---|--|--|
| <b>Bank</b>                                     | <b>Total Assets as of<br/>9/30/2022<br/>(\$000s)</b> | <b>Average Net<br/>LTD Ratio<br/>(%)</b> |
| <b>Keystone Bank, SSB, Austin, TX</b>           | <b>758,900</b>                                       | <b>75.6</b>                              |
| The First National Bank of Bastrop, Bastrop, TX | 952,975  | 62.1                                     |
| Frontier Bank of Texas, Elgin, TX               | 673,364  | 77.2                                     |
| R Bank, Round Rock, TX                          | 980,059  | 73.4                                     |

*Source: Reports of Condition and Income (09/30/2018 - 9/30/2022)*

## **Assessment Area Concentration**

A majority of loans are in the institution's assessment areas. As reflected in the following table, Keystone Bank, SSB originated a majority of small business and home mortgage loans by number and dollar volume inside the assessment areas.

| <b>Lending Inside and Outside of the Assessment Area</b> |                        |             |                |             |                    |  |             |                |             |                           |  |  |
|--|------------------------|-------------|----------------|-------------|--------------------|--|-------------|----------------|-------------|---------------------------|--|--|
| <b>Loan Category</b>                                     | <b>Number of Loans</b> |             |                |             | <b>Total<br/>#</b> | <b>Dollar Amount of Loans \$(000s)</b> |             |                |             | <b>Total<br/>\$(000s)</b> |  |  |
|  | <b>Inside</b>          |             | <b>Outside</b> |             |                    | <b>Inside</b>                          |             | <b>Outside</b> |             |                           |  |  |
|  | #                      | %           | #              | %           |                    | \$                                     | %           | \$             | %           |                           |  |  |
| Small Business   | 83                     | 63.8        | 47             | 36.2        | 130                | 28,786                                 | 63.3        | 16,723         | 36.7        | 45,509                    |  |  |
| Home Mortgage  | 60                     | 70.6        | 25             | 29.4        | 85                 | 97,615                                 | 84.5        | 17,851         | 15.5        | 115,466                   |  |  |
| <b>Total</b>   | <b>143</b>             | <b>66.5</b> | <b>72</b>      | <b>33.5</b> | <b>215</b>         | <b>126,401</b>                         | <b>78.5</b> | <b>34,574</b>  | <b>21.5</b> | <b>160,975</b>            |  |  |

*Source: Bank Data  
Due to rounding, totals may not equal 100.0%*

## **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. Reasonable performances in the Austin MSA AA and Texas Non-MSA AA support this conclusion. Examiners considered the loan product types reviewed relative to the available comparative data and any performance context issues when arriving at this conclusion. Examiners focused on the percentages by the number of loans in low- and moderate-income geographies, if possible, when arriving at this conclusion.

## **Borrower Profile**

The distribution of borrowers reflects, given the demographics of the assessment areas, poor penetration among individuals of different income levels (including low- and moderate-income) and businesses and farms of different sizes. Poor performance in the Austin MSA AA, the more heavily weighted assessment area, outweighed reasonable performance in the Texas Non-MSA AA to support this conclusion. Examiners considered the loan product types reviewed relative to the available comparative data and any performance context issues when arriving at this conclusion. Examiners focused on the percentage of small business and small farm loans to entities with gross annual revenues (GARs) of \$1 million or less, as well as the percentage of home mortgage loans to low- and moderate-income borrowers.

## **Response to Complaints**

The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

## **COMMUNITY DEVELOPMENT TEST**

Keystone Bank, SSB's performance under the Community Development Test is outstanding. The institution's community development performance demonstrates excellent responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas. In addition, examiners considered the limited time during the review period for which the bank was subject to community development requirements under the Community Development Test. Excellent responsiveness to the community development needs and an excellent record regarding community development loans, without simply ignoring the other types of community development activities, support this conclusion. The bank also demonstrated an excellent record regarding its community development services and a poor record regarding its qualified investments.

## **Community Development Loans**

The bank exhibited an excellent record regarding community development loans. An excellent level by dollar volume of community development loans primarily supports this conclusion. Examiners evaluated the number and dollar volume of community development loans considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas when arriving at this conclusion.

Keystone Bank, SSB granted 39 community development loans totaling nearly \$30.3 million. This level of activity represents 8.9 percent of the average total assets and 12.7 percent of the average net loans since the previous evaluation. Further, the community development loans proved responsive to the areas' needs given that they primarily address affordable housing and community services needs throughout the assessment areas. As seen in the following tables, 61.7 percent by dollar volume address activities that support affordable housing and community services, which demonstrates the bank's responsiveness to identified community development needs. In addition, the bank worked with the SBA to make small business loans through programs under the Coronavirus Aid, Relief, and Economic Security (CARES) Act, further demonstrating responsiveness to community needs. The following table illustrates the bank's community development lending activity by year and purpose.

| Community Development Lending |                    |               |                    |              |                      |               |                         |          |           |               |
|-------------------------------|--------------------|---------------|--------------------|--------------|----------------------|---------------|-------------------------|----------|-----------|---------------|
| Activity Year                 | Affordable Housing |               | Community Services |              | Economic Development |               | Revitalize or Stabilize |          | Totals    |               |
|                               | #                  | \$(000s)      | #                  | \$(000s)     | #                    | \$(000s)      | #                       | \$(000s) | #         | \$(000s)      |
| 2018                          | 0                  | 0             | 0                  | 0            | 0                    | 0             | 0                       | 0        | 0         | 0             |
| 2019                          | 0                  | 0             | 0                  | 0            | 0                    | 0             | 0                       | 0        | 0         | 0             |
| 2020                          | 20                 | 7,645         | 1                  | 2,000        | 0                    | 0             | 0                       | 0        | 21        | 9,645         |
| 2021                          | 1                  | 362           | 0                  | 0            | 13                   | 11,590        | 0                       | 0        | 14        | 11,952        |
| 2022                          | 3                  | 6,694         | 1                  | 2,000        | 0                    | 0             | 0                       | 0        | 4         | 8,694         |
| 2023 (YTD)                    | 0                  | 0             | 0                  | 0            | 0                    | 0             | 0                       | 0        | 0         | 0             |
| <b>Total</b>                  | <b>24</b>          | <b>14,701</b> | <b>2</b>           | <b>4,000</b> | <b>13</b>            | <b>11,590</b> | <b>0</b>                | <b>0</b> | <b>39</b> | <b>30,291</b> |

Source: Bank Data

The following table shows the bank's community development loans benefitting each assessment area.

| Community Development Lending by Assessment Area |                    |               |                    |              |                      |               |                         |          |           |               |
|--|--------------------|---------------|--------------------|--------------|----------------------|---------------|-------------------------|----------|-----------|---------------|
| Assessment Area                                  | Affordable Housing |               | Community Services |              | Economic Development |               | Revitalize or Stabilize |          | Totals    |               |
|  | #                  | \$(000s)      | #                  | \$(000s)     | #                    | \$(000s)      | #                       | \$(000s) | #         | \$(000s)      |
| Austin MSA AA                                    | 24                 | 14,701        | 2                  | 4,000        | 13                   | 11,590        | 0                       | 0        | 39        | 30,291        |
| Texas Non-MSA AA                                 | 0                  | 0             | 0                  | 0            | 0                    | 0             | 0                       | 0        | 0         | 0             |
| <b>Total</b>                                     | <b>24</b>          | <b>14,701</b> | <b>2</b>           | <b>4,000</b> | <b>13</b>            | <b>11,590</b> | <b>0</b>                | <b>0</b> | <b>39</b> | <b>30,291</b> |

Source: Bank Data

## **Qualified Investments**

The bank displayed a poor record regarding qualified investments. Poor performance regarding the dollar volume of qualified investments primarily supports this conclusion. Examiners considered the number and dollar volume of qualified investments, the institution's capacity, and the need and availability of such opportunities for community development in the institution's assessment areas when arriving at this conclusion.

Keystone Bank, SSB made use of 34 qualified investments totaling \$386 thousand, including 33 grants and donations totaling \$154 thousand. The total dollar volume of qualified investments grants represents only 0.1 percent of the average total assets and 1.4 percent of average total securities since the previous evaluation. The following tables indicate some of the qualified investments support activities targeting affordable housing and community services toward low- and moderate-income individuals. These efforts, while limited, demonstrate some responsiveness to identified community development needs. The following table illustrates the bank's qualified investments by year and purpose.

| Qualified Investments        |                    |            |                    |            |                      |          |                         |          |           |            |
|------------------------------|--------------------|------------|--------------------|------------|----------------------|----------|-------------------------|----------|-----------|------------|
| Activity Year                | Affordable Housing |            | Community Services |            | Economic Development |          | Revitalize or Stabilize |          | Totals    |            |
|                              | #                  | \$(000s)   | #                  | \$(000s)   | #                    | \$(000s) | #                       | \$(000s) | #         | \$(000s)   |
| 2018                         | 0                  | 0          | 0                  | 0          | 0                    | 0        | 0                       | 0        | 0         | 0          |
| 2019                         | 0                  | 0          | 0                  | 0          | 0                    | 0        | 0                       | 0        | 0         | 0          |
| 2020                         | 0                  | 0          | 0                  | 0          | 0                    | 0        | 0                       | 0        | 0         | 0          |
| 2021                         | 0                  | 0          | 0                  | 0          | 0                    | 0        | 0                       | 0        | 0         | 0          |
| 2022                         | 1                  | 232        | 0                  | 0          | 0                    | 0        | 0                       | 0        | 1         | 232        |
| 2023 (YTD)                   | 0                  | 0          | 0                  | 0          | 0                    | 0        | 0                       | 0        | 0         | 0          |
| <b>Subtotal</b>              | <b>1</b>           | <b>232</b> | <b>0</b>           | <b>0</b>   | <b>0</b>             | <b>0</b> | <b>0</b>                | <b>0</b> | <b>1</b>  | <b>232</b> |
| Qualified Grants & Donations | 5                  | 20         | 27                 | 131        | 1                    | 3        | 0                       | 0        | 33        | 154        |
| <b>Total</b>                 | <b>6</b>           | <b>252</b> | <b>27</b>          | <b>131</b> | <b>1</b>             | <b>3</b> | <b>0</b>                | <b>0</b> | <b>34</b> | <b>386</b> |

*Source: Bank Data*

The following table shows the bank's qualified investments for each assessment area.

| Qualified Investments by Assessment Area |                    |            |                    |            |                      |          |                         |          |           |            |
|--|--------------------|------------|--------------------|------------|----------------------|----------|-------------------------|----------|-----------|------------|
| Assessment Area                          | Affordable Housing |            | Community Services |            | Economic Development |          | Revitalize or Stabilize |          | Totals    |            |
|  | #                  | \$(000s)   | #                  | \$(000s)   | #                    | \$(000s) | #                       | \$(000s) | #         | \$(000s)   |
| Austin MSA AA                            | 6                  | 252        | 18                 | 117        | 1                    | 3        | 0                       | 0        | 25        | 372        |
| Texas Non-MSA AA                         | 0                  | 0          | 9                  | 14         | 0                    | 0        | 0                       | 0        | 9         | 14         |
| <b>Total</b>                             | <b>6</b>           | <b>252</b> | <b>27</b>          | <b>131</b> | <b>1</b>             | <b>3</b> | <b>0</b>                | <b>0</b> | <b>34</b> | <b>386</b> |

*Source: Bank Data*

## **Community Development Services**

The bank demonstrated an excellent record of providing community development services. Overall excellent performance regarding the types of services support this conclusion. Examiners evaluated the types and availability of services considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas when arriving at this conclusion.

The following table shows the institution provided 84 instances of financial expertise or technical assistance to community development-related organizations during the evaluation period, reflective of excellent performance considering the number of bank offices. The table also shows that 65.5 percent of the services benefited organizations providing community services and 32.1 percent benefitted affordable housing, some in leadership roles as Board or committee members, which demonstrates the bank's responsiveness to identified needs in its assessment areas. The following table illustrates the bank's community development services by year and purpose.

| Community Development Services |                    |                    |                      |                         |           |
|--------------------------------|--------------------|--------------------|----------------------|-------------------------|-----------|
| Activity Year                  | Affordable Housing | Community Services | Economic Development | Revitalize or Stabilize | Totals    |
|                                | #                  | #                  | #                    | #                       | #         |
| 2018                           | 0                  | 0                  | 0                    | 0                       | <b>0</b>  |
| 2019                           | 0                  | 0                  | 0                    | 0                       | <b>0</b>  |
| 2020                           | 9                  | 4                  | 0                    | 0                       | <b>13</b> |
| 2021                           | 10                 | 17                 | 0                    | 0                       | <b>27</b> |
| 2022                           | 8                  | 33                 | 2                    | 0                       | <b>43</b> |
| 2023 (YTD)                     | 0                  | 1                  | 0                    | 0                       | <b>1</b>  |
| <b>Total</b>                   | <b>27</b>          | <b>55</b>          | <b>2</b>             | <b>0</b>                | <b>84</b> |

*Source: Bank Data*

The following table shows the bank's community services benefitting each assessment area.

| Community Development Services by Assessment Area |                    |                    |                      |                         |           |
|---|--------------------|--------------------|----------------------|-------------------------|-----------|
| Assessment Area                                   | Affordable Housing | Community Services | Economic Development | Revitalize or Stabilize | Totals    |
|   | #                  | #                  | #                    | #                       | #         |
| Austin MSA AA                                     | 27                 | 55                 | 0                    | 0                       | <b>82</b> |
| Texas Non-MSA AA                                  | 0                  | 0                  | 2                    | 0                       | <b>2</b>  |
| <b>Total</b>                                      | <b>27</b>          | <b>55</b>          | <b>2</b>             | <b>0</b>                | <b>84</b> |

*Source: Bank Data*

Although the bank does not operate any branches or ATMs in low- or moderate-income census tracts, examiners noted Keystone Bank, SSB's other alternative delivery systems, including mobile banking, online banking, and debit cards help avail the bank's services to low- and moderate-income individuals across the assessment areas. Further, Keystone Bank, SSB offers hours and days of service consistent with the industry and the areas in which it operates.

## DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

### AUSTIN MSA AA – Full-Scope Review

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN AUSTIN MSA AA

The Austin MSA AA includes all 290 census tracts in Travis County located in the central portion of Texas. Keystone Bank, SSB operates two full-service offices and one ATM in this assessment area. The bank closed its downtown branch in the Austin MSA AA during December of 2020.

#### Economic and Demographic Data

The Austin MSA AA census tracts reflect the following income designations based on 2020 U.S. Census data: 24 low-, 71 moderate-, 79 middle-, 100 upper-tracts, and 16 with no income designation. The following table provides additional demographic and economic data for the area.

| Demographic Information of the Assessment Area<br>Austin MSA AA       |           |                              |                 |               |              |            |
|---|-----------|------------------------------|-----------------|---------------|--------------|------------|
| Demographic Characteristics   | #         | Low % of #                   | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts)   | 290       | 8.3                          | 24.5            | 27.2          | 34.5         | 5.5        |
| Population by Geography   | 1,290,188 | 8.2                          | 24.9            | 28.8          | 34.6         | 3.5        |
| Housing Units by Geography  | 530,125   | 7.9                          | 24.2            | 30.0          | 35.6         | 2.3        |
| Owner-Occupied Units by Geography                                     | 260,455   | 3.5                          | 19.6            | 31.4          | 44.8         | 0.8        |
| Occupied Rental Units by Geography                                    | 231,076   | 12.5                         | 30.0            | 28.5          | 25.3         | 3.6        |
| Vacant Units by Geography   | 38,594    | 10.0                         | 20.4            | 29.7          | 35.8         | 4.1        |
| Businesses by Geography   | 286,282   | 2.9                          | 13.1            | 18.8          | 56.5         | 8.7        |
| Farms by Geography  | 4,454     | 2.8                          | 13.9            | 19.1          | 57.8         | 6.4        |
| Family Distribution by Income Level                                   | 280,144   | 21.8                         | 16.5            | 19.8          | 41.9         | 0.0        |
| Household Distribution by Income Level                                | 491,531   | 23.5                         | 16.6            | 17.9          | 42.0         | 0.0        |
| Median Family Income MSA - 12420 Austin-Round Rock-Georgetown, TX MSA | \$100,215 | Median Housing Value         |                 |               | \$379,220    |            |
|   |           | Median Gross Rent            |                 |               | \$1,365      |            |
|   |           | Families Below Poverty Level |                 |               | 7.5%         |            |

*Source: 2020 U.S. Census; 2022 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\*) The NA category consists of geographies that have not been assigned an income classification.*

During the evaluation period, FEMA declared Travis County a major disaster area due to the COVID-19 pandemic, severe winter storms, and tropic storms.

Examiners used the applicable Federal Financial Institutions Examination Council (FFIEC)-estimated median family income (MFI) to analyze home mortgage loans under the borrower profile performance factor. The following table shows the calculated income ranges based on the 2022 FFIEC-estimated MFI of \$110,300 for the Austin-Round Rock-Georgetown, TX MSA.

| Median Family Income Ranges                                      |             |                         |                        |                |
|--|-------------|-------------------------|------------------------|----------------|
| Median Family Incomes  | Low<br><50% | Moderate<br>50% to <80% | Middle<br>80% to <120% | Upper<br>≥120% |
| <b>Austin-Round Rock-Georgetown, TX MSA Median Family Income</b> |             |                         |                        |                |
| 2022 (\$110,300)   | <\$55,150   | \$55,150 to <\$88,240   | \$88,240 to <\$132,360 | ≥\$132,360     |
| <i>Source: FFIEC</i>   |             |                         |                        |                |

The largest industries in the assessment area include non-classifiable establishments and services. Additionally, the majority of businesses are small with 95.3 percent operating from a single location and 54.2 percent employing 4 or fewer employees. The major employers in the assessment area include H-E-B, Dell Technologies, and Ascension Texas.

Data obtained from the U.S. Bureau of Labor Statistics indicates the December 2022 unemployment rate was 2.6 percent for Travis County in comparison to both the State of Texas and the national rates of 3.9 percent and 3.5 percent, respectively.

### **Competition**

The Austin MSA AA is highly competitive for financial services. According to the FDIC June 30, 2022, Summary of Deposit Report, 54 financial institutions operate 239 offices inside the assessment area. Of these institutions, Keystone Bank, SSB ranked 14<sup>th</sup> with a deposit market share of 1.2 percent.

Keystone Bank, SSB is not required to collect or report its small business and home mortgage loan data, and it has not elected to do so. However, in 2021, 252 institutions reported 47,790 small business loans totaling \$1.9 billion and 831 lenders reported \$48.6 billion in home mortgage loans. The top 3 institutions accounted for 52.0 percent of the total market share by loan volume for small business loans and 12.0 percent of the total market share by loan volume for home mortgage loans, further supporting the high level of competition for this assessment area.

### **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the area's credit needs. This information helps determine whether local financial institutions are responsive to those needs. It also shows what credit opportunities are available.

Examiners used an existing community contact to help assess the current economic conditions, community credit needs, and potential opportunities for bank involvement in this area which indicated that the assessment area's credit needs include lending to small businesses and affordable housing. The community contact indicated the area has a diverse population, including a large

segment of young professionals with higher education. The individual also noted the area benefits from several major industries; however, the skyrocketing housing costs contribute to the working class migrating to more rural areas. Additionally, the contact indicated there are a variety of lending opportunities available, especially for small business and home mortgage loans, and that the area's financial institutions appropriately serve the general banking and credits needs of the area.

### **Credit and Community Development Needs and Opportunities**

Considering information from the community contact, bank management, and demographic and economic data, examiners concluded that small business, small farm, and home mortgage loans represent the assessment area's primary credit needs.

With respect to the area's community development needs, the previously described FEMA major disaster declarations indicate a need for revitalization and stabilization of the designated disaster areas. In addition, examiners considered that over one-third, or 38.3 percent, of the area's families report either low or moderate incomes. These characteristics typically suggest a higher need for activities that aid in providing community services targeted to low- and moderate-income individuals. Other community development needs exist regarding affordable housing activities as shared by the community contact.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN AUSTIN MSA AA LENDING TEST**

Keystone Bank, SSB demonstrated a satisfactory record under the Lending Test in the Austin MSA AA. Reasonable performance regarding the geographic distribution record slightly lifted poor performance regarding the borrower profile record to support this conclusion.

### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the Austin MSA AA. Reasonable records regarding small business and home mortgage loans support this conclusion.

#### ***Small Business Loans***

The geographic distribution of small business loans reflects reasonable dispersion in the Austin MSA AA. Reasonable performances in both low- and moderate-income geographies support this conclusion. As shown in the following table, in low-income tracts, the institution's lending level is consistent with the percentage of businesses, evidencing a reasonable level. The table further shows that in moderate-income tracts, the institution's lending level trails the percentage of businesses by only 1.7 percentage points, also evidencing reasonable performance.

| Geographic Distribution of Small Business Loans<br>Austin MSA AA |                 |           |              |               |              |
|--|-----------------|-----------|--------------|---------------|--------------|
| Tract Income Level   | % of Businesses | #         | %            | \$(000s)      | %            |
| Low  | 2.9             | 2         | 2.9          | 395           | 1.4          |
| Moderate   | 13.1            | 8         | 11.4         | 3,943         | 13.9         |
| Middle   | 18.8            | 14        | 20.0         | 4,614         | 16.3         |
| Upper  | 56.5            | 40        | 57.1         | 17,780        | 62.8         |
| Not Available  | 8.7             | 6         | 8.6          | 1,563         | 5.5          |
| <b>Totals</b>  | <b>100.0</b>    | <b>70</b> | <b>100.0</b> | <b>28,295</b> | <b>100.0</b> |

Source: 2022 D&B Data; Bank Data  
Due to rounding, totals may not equal 100.0%

### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans reflects reasonable dispersion in the Austin MSA AA. Reasonable performances in low- and moderate-income census tracts support this conclusion. As shown in the following table, the institution's level in low-income tracts trails demographic data by 3.5 percentage points, reflective of reasonable performance. The table further shows that in moderate-income tracts, the institution's lending level trails demographic data by 7.5 percentage points, also reflecting reasonable performance.

| Geographic Distribution of Home Mortgage Loans<br>Austin MSA AA |                                   |           |              |               |              |
|---|-----------------------------------|-----------|--------------|---------------|--------------|
| Tract Income Level  | % of Owner-Occupied Housing Units | #         | %            | \$(000s)      | %            |
| Low   | 3.5                               | 0         | 0.0          | 0             | 0.0          |
| Moderate  | 19.6                              | 7         | 12.1         | 4,082         | 4.2          |
| Middle  | 31.4                              | 4         | 6.9          | 1,539         | 1.6          |
| Upper   | 44.8                              | 45        | 77.6         | 91,342        | 93.8         |
| Not Available   | 0.8                               | 2         | 3.4          | 407           | 0.4          |
| <b>Total</b>  | <b>100.0</b>                      | <b>58</b> | <b>100.0</b> | <b>97,370</b> | <b>100.0</b> |

Source: 2020 U.S. Census; Bank Data  
Due to rounding, totals may not equal 100.0%

### **Borrower Profile**

The distribution of borrowers reflects, given the demographics of the assessment area, poor penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes in the Austin MSA AA. A reasonable record regarding small business loans hampered by a poor record regarding home mortgage loans supports this conclusion.

### ***Small Business Loans***

The distribution of borrowers reflects reasonable penetration among businesses of different sizes in the Austin MSA AA. The institution's lending to businesses with GARs of \$1 million or less supports this conclusion. The following table shows the institution originated less than a majority, or 42.6 percent, of the reviewed small business loans to businesses with GARs of \$1 million or less, typically reflective of poor performance. While the bank's level trails, by 50.4 percentage points, the percent of businesses reporting GARs of \$1 million or less, the table also notes 10 small business loans to businesses with revenues not available. Of the 37 loans in the table with revenue data, the bank originated over 5 out of every 10 loans to businesses with GARs of \$1 million or less, supporting reasonable performance.

Given the volume of loans with revenues not available, examiners also considered loan size as a measure of the financial institution's contribution to the needs of small businesses. Examiners determined that all loans originated with revenue unavailable were equal to or less than \$1 million in loan size, illustrating the bank's willingness to meet credit needs of businesses of varying sizes, including small businesses.

| <b>Distribution of Small Business Loans by Gross Annual Revenue Category</b><br><b>Austin MSA AA</b> |                        |           |              |                 |              |
|--|------------------------|-----------|--------------|-----------------|--------------|
| <b>Gross Revenue Level</b>   | <b>% of Businesses</b> | <b>#</b>  | <b>%</b>     | <b>\$(000s)</b> | <b>%</b>     |
| < \$100,000  | 74.9                   | 6         | 12.8         | 1,545           | 7.9          |
| \$100,000 - \$249,999  | 13.8                   | 3         | 6.4          | 1,325           | 6.8          |
| \$250,000 - \$499,999  | 2.9                    | 7         | 14.9         | 1,997           | 10.2         |
| \$500,000 - \$1,000,000  | 1.4                    | 4         | 8.5          | 1,575           | 8.0          |
| <b>Subtotal &lt;= \$1,000,000</b>  | <b>93.0</b>            | <b>20</b> | <b>42.6</b>  | <b>6,442</b>    | <b>32.9</b>  |
| >\$1,000,000   | 2.0                    | 17        | 36.2         | 8,847           | 45.2         |
| Revenue Not Available  | 5.0                    | 10        | 21.3         | 4,286           | 21.9         |
| <b>Total</b>   | <b>100.0</b>           | <b>47</b> | <b>100.0</b> | <b>19,575</b>   | <b>100.0</b> |

*Source: 2022 D&B Data; Bank Data  
Due to rounding, totals may not equal 100.0%*

### ***Home Mortgage Loans***

The distribution of borrowers reflects poor penetration to individuals of different income levels in the Austin MSA AA. A very poor record regarding lending to moderate-income borrowers slightly lifted by a reasonable record to low-income borrowers supports this conclusion. The following table indicates the institution's level of home mortgage lending to low-income borrowers trails demographic data by 19.6 percentage points, typically reflecting a very poor level. While low-income families comprise 21.8 percent of the area's families, 7.5 percent of the area's total families reported incomes below the poverty level, and notably greater challenges exist for these families when trying to qualify for home mortgage loans, typically higher dollar volume and longer-term loans. Further, examiners considered the median housing value and applicable MFI. Considering this performance context information, examiners determined that the bank's lending to low-income borrowers reflects a reasonable record.

The table further shows the institution's level of lending to moderate-income borrowers falls 14.3 percentage points below demographic data, which reflects very poor performance.

| Distribution of Home Mortgage Loans by Borrower Income Level<br>Austin MSA AA |               |           |              |               |              |
|---|---------------|-----------|--------------|---------------|--------------|
| Borrower Income Level   | % of Families | #         | %            | \$ (000s)     | %            |
| Low   | 21.8          | 1         | 2.2          | 455           | 0.6          |
| Moderate  | 16.5          | 1         | 2.2          | 80            | 0.1          |
| Middle  | 19.8          | 2         | 4.4          | 380           | 0.5          |
| Upper   | 41.9          | 33        | 73.3         | 47,438        | 62.0         |
| Not Available   | 0.0           | 8         | 17.8         | 28,105        | 36.8         |
| <b>Total</b>  | <b>100.0</b>  | <b>45</b> | <b>100.0</b> | <b>76,458</b> | <b>100.0</b> |

Source: 2020 U.S. Census; Bank Data  
Due to rounding, totals may not equal 100.0%

## COMMUNITY DEVELOPMENT TEST

The bank demonstrated an outstanding record regarding the Community Development Test in the Austin MSA AA. The institution's community development performance demonstrates excellent responsiveness to community development needs in the Austin MSA AA through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment area.

### Community Development Loans

The bank originated 39 community development loans totaling nearly \$30.3 million in the Austin MSA AA. This level equates to 100.0 percent of the bank's overall excellent level of community development loans by dollar volume. As noted, this area accounted for 97.5 percent of the bank's lending volume.

The institution's community development loans proved responsive to the area's needs. Approximately 61.7 percent by dollar volume address activities that support affordable housing and community services, which demonstrates the bank's responsiveness to identified community development needs. The following point highlights an example of the bank's community development loans in the Austin MSA AA.

- **Community Services** – The bank granted 2 loans totaling \$4 million to a local entity that creates innovative learning experiences and is free to individuals receiving governmental assistance and therefore, providing access to low- and moderate-income individuals.

## **Qualified Investments**

The bank made use of only 25 qualified investments totaling \$372 thousand in the Austin MSA AA. The total dollar amount equates to 96.4 percent of the bank's overall poor level of qualified investments. As noted, this area contributed 91.4 percent of the bank's total deposits.

The qualified investments primarily benefit affordable housing within the Austin MSA AA, which although limited, reflects some responsiveness to an identified community development need. The following point highlights an example of the bank's qualified investments in the Austin MSA AA.

- ***Affordable Housing*** – The bank invested in 1 qualified mortgage security in the amount of \$232 thousand primarily designated to provide affordable housing.

## **Community Development Services**

The bank provided 82 community development services in the Austin MSA AA, which equates to 97.6 percent of the bank's total community development services. A majority of the community development services benefited community services efforts within the Austin MSA, which demonstrates the bank's responsiveness to an identified community development need. The following point highlights an example of the bank's community development services in the Austin MSA AA.

- ***Community Services*** – An executive served on the finance committee of a non-profit organization that brings people together to build homes, communities, and hope to low- and moderate-income individuals.

Although the bank does not operate any branches or ATMs in low- or moderate-income census tracts in the Austin MSA AA, examiners noted Keystone Bank, SSB's other alternative delivery systems, including mobile banking, online banking, and debit cards help avail the bank's services to low- and moderate-income individuals across the assessment area.

## **TEXAS NON-MSA AA – Limited-Scope Review**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN TEXAS NON-MSA AA**

The Texas Non-MSA AA includes all four census tracts in Runnels County located in West Central Texas. Keystone Bank, SSB operates one full-service office and one ATM in a middle-income census tract in this assessment area.

## **Economic and Demographic Data**

The Texas Non-MSA AA census tracts reflect the following income designations based on 2020 U.S. Census data: 1 moderate- and 3 middle-income census tracts. The following table provides additional demographic and economic data for the area.

| Demographic Information of the Assessment Area<br>Texas Non MSA AA |          |                              |                 |               |              |            |
|--|----------|------------------------------|-----------------|---------------|--------------|------------|
| Demographic Characteristics  | #        | Low % of #                   | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts)  | 4        | 0.0                          | 25.0            | 75.0          | 0.0          | 0.0        |
| Population by Geography  | 9,900    | 0.0                          | 21.2            | 78.8          | 0.0          | 0.0        |
| Housing Units by Geography   | 5,245    | 0.0                          | 20.0            | 80.0          | 0.0          | 0.0        |
| Owner-Occupied Units by Geography                                  | 2,838    | 0.0                          | 16.3            | 83.7          | 0.0          | 0.0        |
| Occupied Rental Units by Geography                                 | 1,053    | 0.0                          | 25.9            | 74.1          | 0.0          | 0.0        |
| Vacant Units by Geography  | 1,354    | 0.0                          | 23.0            | 77.0          | 0.0          | 0.0        |
| Businesses by Geography  | 901      | 0.0                          | 17.8            | 82.2          | 0.0          | 0.0        |
| Farms by Geography   | 139      | 0.0                          | 8.6             | 91.4          | 0.0          | 0.0        |
| Family Distribution by Income Level                                | 2,591    | 20.3                         | 21.3            | 19.6          | 38.8         | 0.0        |
| Household Distribution by Income Level                             | 3,891    | 25.3                         | 16.8            | 19.0          | 38.9         | 0.0        |
| Median Family Income Non-MSAs - TX                                 | \$61,785 | Median Housing Value         |                 |               | \$90,653     |            |
|  |          | Median Gross Rent            |                 |               | \$761        |            |
|  |          | Families Below Poverty Level |                 |               | 10.2%        |            |

Source: 2020 U.S. Census; 2022 D&B Data  
Due to rounding, totals may not equal 100.0%  
(\*) The NA category consists of geographies that have not been assigned an income classification.

Data obtained from the U.S. Bureau of Labor Statistics indicates the December 2022 unemployment rate was 3.1 for Runnels County in comparison to both the State of Texas and the national rate of 3.9 percent and 3.5 percent, respectively. Major employers in the area include Ballinger Memorial Hospital, North Runnels Hospital, Walmart, and the State of Texas.

## CONCLUSIONS ON PERFORMANCE CRITERIA IN TEXAS NON-MSA AA

### LENDING TEST

The institution's lending performance in the Texas Non-MSA AA is consistent with the institution's lending performance overall.

## **Geographic Distribution**

### ***Small Farm Loans***

| <b>Geographic Distribution of Small Farm Loans</b><br><b>Texas Non-MSA AA</b> |                   |           |              |                 |              |
|---|-------------------|-----------|--------------|-----------------|--------------|
| <b>Tract Income Level</b>   | <b>% of Farms</b> | <b>#</b>  | <b>%</b>     | <b>\$(000s)</b> | <b>%</b>     |
| Low   | 0.0               | 0         | 0.0          | 0               | 0.0          |
| Moderate  | 8.6               | 2         | 12.5         | 550             | 27.1         |
| Middle  | 91.4              | 14        | 87.5         | 1,482           | 72.9         |
| Upper   | 0.0               | 0         | 0.0          | 0               | 0.0          |
| Not Available   | 0.0               | 0         | 0.0          | 0               | 0.0          |
| <b>Totals</b>   | <b>100.0</b>      | <b>16</b> | <b>100.0</b> | <b>2,032</b>    | <b>100.0</b> |

*Source: 2022 D&B Data; Bank Data.  
Due to rounding, totals may not equal 100.0%*

## **Borrower Profile**

### ***Small Farm Loans***

| <b>Distribution of Small Farm Loans by Gross Annual Revenue Category</b><br><b>Texas Non-MSA AA</b> |                   |           |              |                 |              |
|---|-------------------|-----------|--------------|-----------------|--------------|
| <b>Gross Revenue Level</b>  | <b>% of Farms</b> | <b>#</b>  | <b>%</b>     | <b>\$(000s)</b> | <b>%</b>     |
| < \$100,000   | 59.7              | 11        | 68.8         | 992             | 48.8         |
| \$100,000 - \$249,999   | 31.7              | 2         | 12.5         | 250             | 12.3         |
| \$250,000 - \$499,999   | 4.3               | 0         | 0.0          | 0               | 0.0          |
| \$500,000 - \$1,000,000   | 1.4               | 1         | 6.3          | 450             | 22.1         |
| <b>Subtotal &lt;= \$1,000,000</b>   | <b>97.1</b>       | <b>14</b> | <b>87.5</b>  | <b>1,692</b>    | <b>83.3</b>  |
| >\$1,000,000  | 2.2               | 2         | 12.5         | 340             | 16.7         |
| Revenue Not Available   | 0.7               | 0         | 0.0          | 0               | 0.0          |
| <b>Total</b>  | <b>100.0</b>      | <b>16</b> | <b>100.0</b> | <b>2,032</b>    | <b>100.0</b> |

*Source: 2022 D&B Data; Bank Data.  
Due to rounding, totals may not equal 100.0%*

## **COMMUNITY DEVELOPMENT TEST**

The institution's community development performance in the Texas Non-MSA AA is below the community development performance for the institution; however, it does not change the institution rating.

## APPENDICES

### INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

#### Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

#### Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

## 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.

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Institution CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Institution CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose institution:
  - (i) Has not been reported or collected by the institution or an affiliate for consideration in the institution's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the institution's assessment area(s) or a broader statewide or regional area including the institution's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the institution's retail banking services under § 345.24(d).

**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.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

**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.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area** (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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 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.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

**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.

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.



## LIST OF BRANCHES

### OPEN BRANCHES

#### **Bee Cave HQ** – Opened December 2023

13715 E. Ladera Blvd.  
Bee Cave, TX 78738  
Telephone: (512) 982-9150

##### Lobby Hours:

|                   |                       |
|-------------------|-----------------------|
| Monday – Friday   | 9:00 am – 5:00 pm CST |
| Saturday & Sunday | Closed                |

##### Drive-Up Hours:

|                   |                       |
|-------------------|-----------------------|
| Monday – Friday   | 8:00 am – 5:00 pm CST |
| Saturday & Sunday | Closed                |

##### Geography:

MSA/MD: 12420  
State/County/Tract: 48-453-0340.00

#### **Ballinger Branch** – Acquired October 2018

900 Hutchins Ave  
Ballinger, TX 76821  
Telephone: (325) 365-3512

##### Lobby Hours:

|                   |                       |
|-------------------|-----------------------|
| Monday – Friday   | 9:00 am – 3:00 pm CST |
| Saturday & Sunday | Closed                |

##### Drive-Up Hours

|                   |                       |
|-------------------|-----------------------|
| Monday – Friday   | 8:30 am – 3:00 pm CST |
| Saturday & Sunday | Closed                |

##### Geography:

MSA/MD: NA  
State/County/Tract: 48-399-9506.00



## LIST OF BRANCHES

### **Downtown Austin - Pressler Branch** - Opened May 2021

507 Pressler St, Suite 400  
Austin, TX 78703  
Telephone: (512) 617-6820

#### Lobby Hours:

|                   |                       |
|-------------------|-----------------------|
| Monday - Friday   | 9:00 am - 4:00 pm CST |
| Saturday & Sunday | Closed                |

#### Geography:

MSA/MD: 12420  
State/County/Tract: 48-453-0012.00

## **CLOSED BRANCHES**

### Bee Cave Branch - Opened October 2018 / Closed December 2023

11500 Bee Caves Rd, Suite 150  
Austin, TX 78738

#### Geography:

MSA/MD: 12420  
State/County/Tract: 48-453-0340.00

## **LPO LOCATION**

### Bastrop Loan Production Office - Opened October 2024

815 Hwy. 71 W, Suite B  
Bastrop, TX 78602

#### Geography:

MSA/MD: 12420  
State/County/Tract: 48-021-9503.03



## DEPOSIT PRODUCTS

### Consumer

- Basic Checking
- Basic Saving
- Keystone Cash Back Checking
- Keystone Rewards Checking
- Keystone Rewards Savings

### Private Client

- Private Client Checking
- Private Client Money Market

### Consumer & Business

- Certificate of Deposit Account
- Founder's Checking
- Founder's Money Market
- Health Savings Accounts (HSA)
- Money Market Accounts

### Business

- Basic Business Savings
- Business Checking
- Business Analysis Checking
- Impact Account
- IOLTA Accounts
- Small Business Checking

**Internet Banking** – Including Online Banking, Online Bill Pay, Mobile Banking, Mobile Wallet, and Zelle®

**Treasury Management** – Remote Deposit Capture, ACH Origination, Online Wire Transfer, Positive Pay



## DEPOSIT PRODUCTS – FEE SCHEDULE

### Consumer Fee Schedule

This Fee Schedule will be effective on July 22, 2024.

**FEES AND CHARGES.** The following fees and charges may be assessed against your account:

|   |          |
|---|----------|
| Non-Sufficient Funds (NSF) Fee          | \$33.00  |
| Overdraft Fee                           | \$33.00  |
| Account Closure within 90 Days          | \$25.00  |
| Account Research (per hour)             | \$25.00  |
| Statement Reconciliation (per hour)     | \$25.00  |
| Statement Reprint                       | \$5.00   |
| Copy Fee (per page)                     | \$1.00   |
| Legal Process Fee                       | \$125.00 |
| Cashier's Check                         | \$5.00   |
| Money Order                             | \$5.00   |
| Temporary Check (per page)              | \$5.00   |
| Stop Payment                            | \$30.00  |
| Change Processing Fee (per \$100)       | \$10.00  |
| Collection Item - Domestic              | \$25.00  |
| Collection Item - Foreign               | \$35.00  |
| Re-deposited/Chargeback Items           | \$10.00  |
| Return Item Redeposit (per item)        | \$5.00   |
| Return Item Special Handling (per item) | \$2.00   |
| Replace Debit Card                      | \$5.00   |
| Balance Inquiry at Non-FI ATM           | \$1.00   |
| Withdrawal at Non-FI ATM                | \$3.00   |
| Safe Deposit Box Lost Key Fee           | \$50.00  |
| Safe Deposit Drill Fee                  | \$200.00 |
| Wire Transfer - Outgoing Domestic       | \$25.00  |
| Wire Transfer - Outgoing International  | \$50.00  |



## Business Fee Schedule

This Fee Schedule will go into effect on December 9, 2024.

**FEES AND CHARGES.** The following fees and charges may be assessed against your account:

|  |          |
|--|----------|
| Non-Sufficient Funds Fee                         | \$38.00  |
| Overdraft Fee                                    | \$38.00  |
| Stop Payment - Manual                            | \$30.00  |
| Cashier's Check                                  | \$5.00   |
| Money Order                                      | \$5.00   |
| Temporary Checks (per page)                      | \$5.00   |
| Collection Item - Domestic                       | \$25.00  |
| Collection Item - Foreign                        | \$35.00  |
| Chargeback Item                                  | \$7.00   |
| Return Item Redeposit (per item)                 | \$6.00   |
| Return Item Special Handling (per item)          | \$7.00   |
| Deposit Corrections                              | \$5.00   |
| Lock Bag (per bag)                               | \$20.00  |
| Zipper Bag (per bag)                             | \$5.00   |
| Replace Debit Card                               | \$5.00   |
| Balance Inquiry at Non-FI ATM                    | \$1.00   |
| Withdrawal at Non-FI ATM                         | \$3.00   |
| Account Closure within 90 Days                   | \$25.00  |
| Account Research (per hour)                      | \$25.00  |
| Statement Reconciliation (per hour)              | \$25.00  |
| Statement Reprint                                | \$5.00   |
| Copy Fee (per page)                              | \$3.00   |
| Legal Process Fee                                | \$125.00 |
| Safe Deposit Box Lost Key Fee                    | \$50.00  |
| Safe Deposit Box Drill Fee                       | \$200.00 |
| Wire Transfer - Outgoing Domestic Manual         | \$60.00  |
| Wire Transfer - Incoming Domestic                | \$10.00  |
| Wire Transfer - Outgoing International Manual    | \$60.00  |
| Wire Transfer - Incoming International           | \$15.00  |
| iPay Business (per user)                         | \$10.00  |
| Excess Money Market Withdrawal (per item over 6) | \$5.00   |
| Check Deposit by Mail (per item)                 | \$1.00   |
| RTP Receive (RTP & FedNow, per item)             | \$0.12   |
| Non-Interest Bearing (NIB) Account Fee           | \$35.00  |
| Online Banking User Fee (per user)               | \$35.00  |
| Rolled Coin - in Branch                          | \$0.10   |
| Currency Straps - in Branch                      | \$0.50   |
| Deposit of Loose Bills (per \$1,000; min \$1.00) | \$1.00   |
| Debits   | \$0.50   |
| Credits  | \$0.20   |
| In-Person/Telephone Transfer                     | \$15.00  |
| Wire Notification - Email                        | \$2.50   |
| Wire Notification - Mail                         | \$10.00  |



## LENDING PRODUCTS

### **Commercial Loans**

- Commercial real Estate Loans
- Construction & Development Loans
- C&I Lines of Credit
- C&I Term Loans
- Commercial Letters of Credit
- Small Business Administration (SBA) Loans

### **Mortgage Loans**

- Home Mortgage Loans
- Home Equity Loans

### **Consumer Loans**

- Unsecured Loans
- New & Used Auto Loans
- Cash Secured Loans
- RV & Boat Loans

### **Agricultural Loans**

- Ag Term Loans
- Ag Lines of Credit
- Farmland Loans



## LENDING PRODUCTS – FEE SCHEDULE

|   | Consumer | Commercial C&I | Commercial RE | 1-4 Family Residential | Construction |
|---|----------|----------------|---------------|------------------------|--------------|
| Origination:  |          | X              | X             | X                      | X            |
| Renewals/Mods/Change in Terms:<br>\$50.00   |          | X              | X             | X                      | X            |
| Admin:<br>\$20.00 (Loans < \$1000)  | X        |                |               |                        |              |
| Outgoing Wire:<br>\$25.00   |          |                | X             | X                      | X            |
| Credit Report:<br>\$8.00/report   | X        | X              | X             | X                      | X            |
| Appraisal:  |          |                | X             | X                      | X            |
| Environmental:  |          |                | X             |                        |              |
| Flood: 14.00/cert   |          |                | X             | X                      | X            |
| UCC County Filing:<br>Varies by County  |          |                | X             | X                      | X            |
| UCC State Filing:   |          | X              | X             | X                      | X            |
| Attorney Doc Prep:  |          | X              | X             | X                      | X            |
| Internal Do Prep Fee New Loans<br>\$250.00 (Loans \$500,000 and up)<br>\$100.00 (Loans under \$500,000) |          | X              |               |                        |              |
| Inspection: 1/mo, cost varies   |          |                |               |                        | X            |
| Construction Mgmt. Fee:<br>Varies by product & loan amount  |          |                |               |                        | X            |
| Final Appraisal:  |          |                |               |                        | X            |
| Final Survey:   |          |                |               |                        | X            |
| Title Endorsement:  |          |                |               |                        | X            |
| Vehicle Title (if applicable):  | X        | X              |               |                        |              |

| CLOSING COSTS MATRIX             |               |            |           |  |   |             |                             |                            |                              |                             |           |  |
|----------------------------------|---------------|------------|-----------|--|---|-------------|-----------------------------|----------------------------|------------------------------|-----------------------------|-----------|--|
| FEE                              | PAYABLE TO    | SECONDARY  |           | PORTFOLIO                                      |   |             |                             |                            |                              |                             |           |  |
|                                  |               | CONV       | JUMBO     | KEY PLUS,<br>KEY ADVANTAGE &<br>PRIVATE CLIENT | 1X CLOSE<br>(INCLUDING<br>PRIVATE CLIENT) | CONST ONLY  | HE - 2ND<br>UNDER<br>\$250K | HE - 2ND<br>\$250K<br>PLUS | HELOC<br>UNDER<br>\$250K *** | HELOC<br>\$250K<br>PLUS *** | LOT       |  |
| Administration Fee ***           | Keystone Bank | \$1895 *** | \$1,895   | \$1895 ***                                     | \$1,895                                   | \$1,895     | \$895                       | \$1,895                    | 1st - \$1895<br>2nd - \$895  | 1st - \$1895<br>2nd - \$895 | \$1,895   |  |
| Origination Fee **               | Keystone Bank | NA         | NA        | 0.50%  | 0.50%                                     | 0.50%       | NA                          | 0.50%                      | NA                           | NA                          | 0.50%     |  |
| Inspection Fees                  | Keystone Bank | NA         | NA        | NA   | SEE BELOW #                               | SEE BELOW # | NA                          | NA                         | NA                           | NA                          | NA        |  |
| Appraisal                        | AMC           | VARIABLES  | VARIABLES | VARIABLES                                      | VARIABLES                                 | VARIABLES   | VARIABLES                   | VARIABLES                  | VARIABLES                    | VARIABLES                   | VARIABLES |  |
| 2nd Appraisal, if required       | AMC           | VARIABLES  | VARIABLES | VARIABLES                                      | VARIABLES                                 | VARIABLES   | NA                          | VARIABLES                  | NA                           | VARIABLES                   | VARIABLES |  |
| Desk Appraisal Review, if needed | AMC           | VARIABLES  | VARIABLES | NA   | NA  | NA          | NA                          | NA                         | NA                           | NA                          | NA        |  |
| Appraisal Final 1004D, if needed | AMC           | VARIABLES  | VARIABLES | VARIABLES                                      | NA  | NA          | NA                          | NA                         | NA                           | NA                          | NA        |  |
| Doc Prep                         | Attorney      | \$275      | \$275     | \$275  | \$500                                     | \$500       | \$275                       | \$275                      | \$275                        | \$275                       | \$325     |  |
| Funding Fee                      | Attorney      | \$75       | \$75      | \$75   | \$75                                      | \$75        | \$75                        | \$75                       | \$75                         | \$75                        | \$75      |  |
| Post-Closing Fee                 | Attorney      | \$125      | \$125     | \$125  | \$125                                     | \$125       | \$125                       | \$125                      | \$125                        | \$125                       | \$125     |  |
| Title Fees                       | Title Company | VARIABLES  | VARIABLES | VARIABLES                                      | VARIABLES                                 | VARIABLES   | NA                          | VARIABLES                  | NA                           | VARIABLES                   | VARIABLES |  |
| Survey                           | Surveyor      | VARIABLES  | VARIABLES | VARIABLES                                      | VARIABLES                                 | VARIABLES   | VARIABLES                   | VARIABLES                  | VARIABLES                    | VARIABLES                   | VARIABLES |  |

\*\* Keystone Bank Investors eligible for 50% off the Origination Fee.

\*\*\* PRIVATE CLIENT HELOCs.

Loan amounts up to \$500,000, No Closing Costs.

Loan amounts over \$500,000, Lender Credit of \$5000 towards closing costs.

**# CONSTRUCTION INSPECTION FEES  
BASED ON CONSTRUCTION PERIOD**

|                |            |
|----------------|------------|
| 12-MONTH CONST | \$1,250.00 |
| 18-MONTH CONST | \$1,875.00 |
| 24-MONTH CONST | \$2,500.00 |

\*\*\*\* SECONDARY CONV, KEY PLUS, KEY ADVANTAGE & PRIVATE CLIENT products.

For Purchase and Rate/Term Refinances with loan amounts \$150,000 and under - Admin Fee is \$750



## LOAN TO DEPOSIT RATIOS

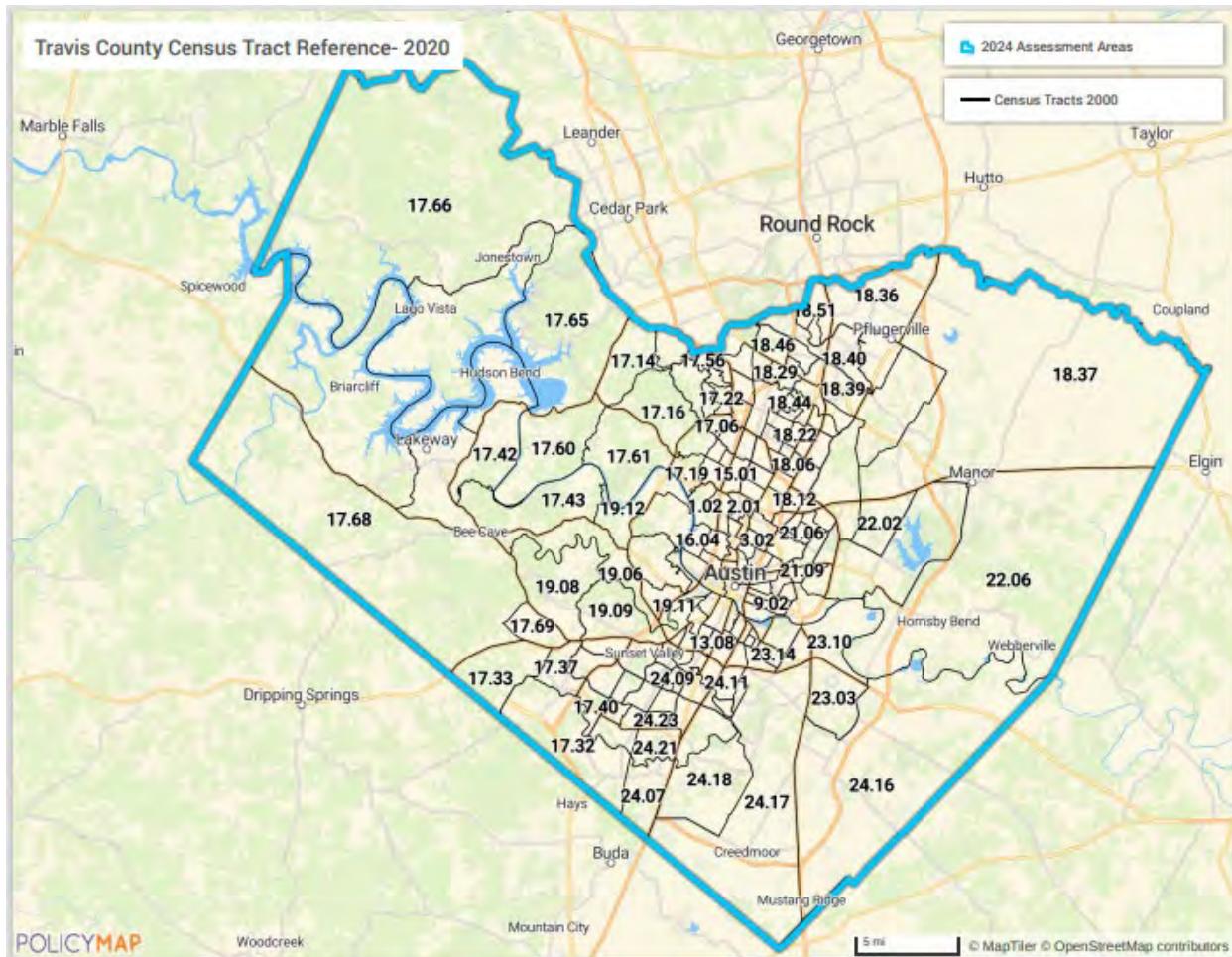
|                    |        |
|--------------------|--------|
| March 31, 2023     | 95.36% |
| June 30, 2023      | 96.65% |
| September 30, 2023 | 91.73% |
| December 31, 2023  | 92.62% |
|                    |        |
| March 31, 2024     | 95.07% |
| June 30, 2024      | 97.62% |
| September 30, 2024 | 93.75% |
| December 31, 2024  | 96.01% |
|                    |        |
| March 31, 2025     | 90.14% |



## ASSESSMENT AREAS

The Bank has designated two (2) counties to be included in our assessment area. They are Travis and Runnels counties. These include the counties in which the Bank has its branch locations.

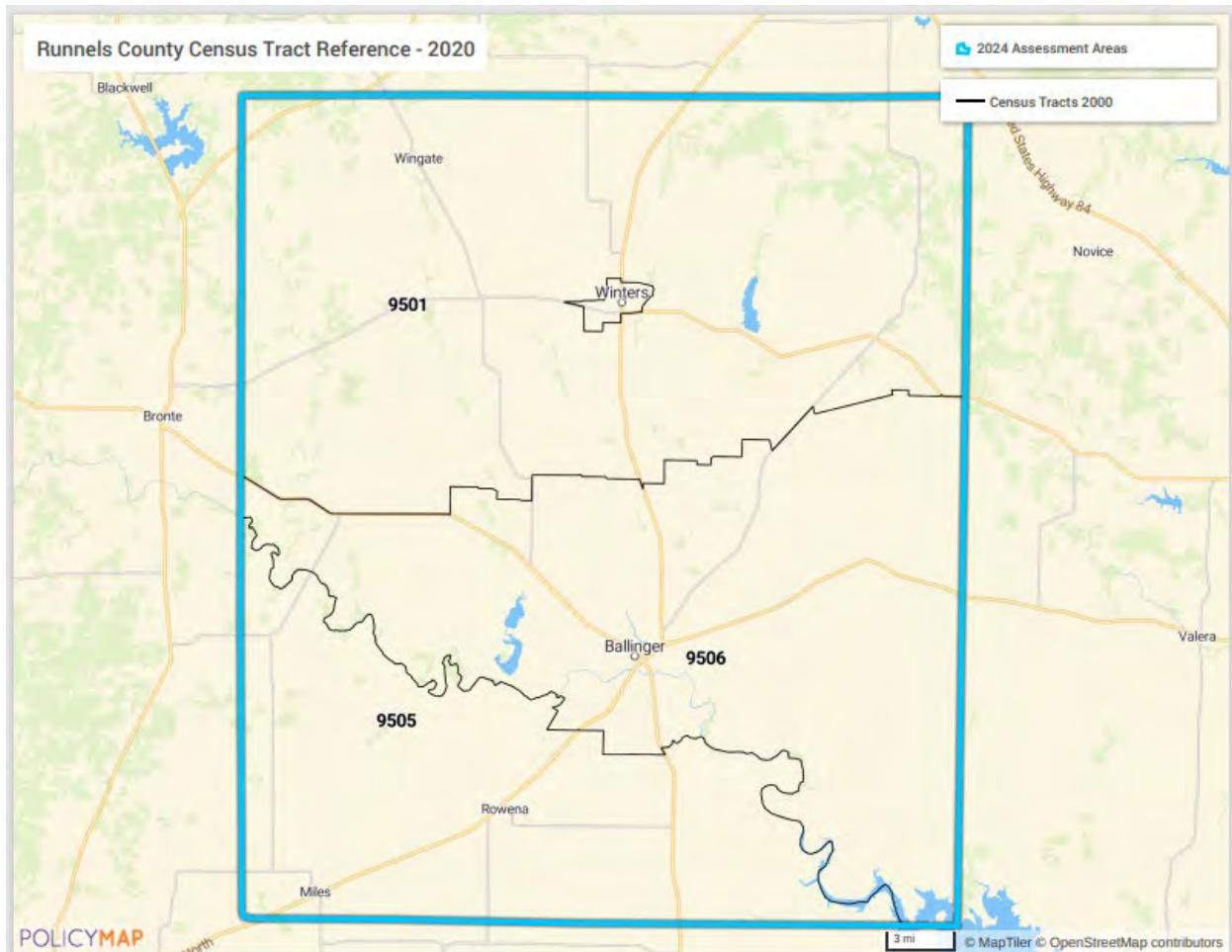
### Travis County by Census Tract





## ASSESSMENT AREAS

### Runnels County by Census Tract



| State Code | County Code | Tract Code | Tract Income Level | Distressed or Underserved Tract | Tract Median Family Income % | 2024 FFIEC Est. MSA/MD non-MSA/MD Median Family Income | 2024 Est. Tract Median Family Income | 2020 Tract Median Family Income | Tract Population | Tract Minority % | Minority Population | Owner Occupied Units | 1- to 4-Family Units |
|------------|-------------|------------|--------------------|---------------------------------|------------------------------|--|--------------------------------------|---------------------------------|------------------|------------------|---------------------|----------------------|----------------------|
| 48         | 399         | 9501.00    | Middle             | No                              | 109.88                       | \$75,500   | \$82,959                             | \$67,917                        | 1320             | 20.00            | 264                 | 424                  | 774                  |
| 48         | 399         | 9502.00    | Moderate           | No                              | 63.70                        | \$75,500   | \$48,094                             | \$39,375                        | 2095             | 54.99            | 1152                | 463                  | 1028                 |
| 48         | 399         | 9505.00    | Middle             | No                              | 113.70                       | \$75,500   | \$85,844                             | \$70,278                        | 1893             | 32.38            | 613                 | 566                  | 924                  |
| 48         | 399         | 9506.00    | Middle             | No                              | 98.37                        | \$75,500   | \$74,269                             | \$60,804                        | 4592             | 39.39            | 1809                | 1385                 | 2500                 |
| 48         | 399         | 9999.99    | Middle             | No                              | 96.44                        | \$75,500   | \$72,812                             | \$59,613                        | 9900             | 38.77            | 3838                | 2838                 | 5226                 |

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| State Code | County Code | Tract Code | Tract Income Level | Distressed or Underserved Tract | Tract Median Family Income % | 2024 FFIEC Est. MSA/MD non-MSA/MD Median Family Income | 2024 Est. Tract Median Family Income | 2020 Tract Median Family Income | Tract Population | Tract Minority % | Minority Population | Owner Occupied Units | 1- to 4-Family Units |
|------------|-------------|------------|--------------------|---------------------------------|------------------------------|--|--------------------------------------|---------------------------------|------------------|------------------|---------------------|----------------------|----------------------|
| 48         | 453         | 0001.01    | Upper              | No                              | 136.07                       | \$126,000  | \$171,448                            | \$136,371                       | 4469             | 18.48            | 826                 | 1230                 | 1600                 |
| 48         | 453         | 0001.02    | Upper              | No                              | 197.69                       | \$126,000  | \$249,089                            | \$198,125                       | 2597             | 14.67            | 381                 | 1013                 | 1104                 |
| 48         | 453         | 0002.03    | Middle             | No                              | 103.83                       | \$126,000  | \$130,826                            | \$104,063                       | 2537             | 37.76            | 958                 | 0                    | 28                   |
| 48         | 453         | 0002.04    | Upper              | No                              | 164.54                       | \$126,000  | \$207,320                            | \$164,900                       | 3167             | 25.70            | 814                 | 711                  | 1119                 |
| 48         | 453         | 0002.05    | Upper              | No                              | 146.10                       | \$126,000  | \$184,086                            | \$146,417                       | 4186             | 32.37            | 1355                | 605                  | 1033                 |
| 48         | 453         | 0002.06    | Upper              | No                              | 148.02                       | \$126,000  | \$186,505                            | \$148,345                       | 3201             | 25.27            | 809                 | 895                  | 1006                 |
| 48         | 453         | 0003.02    | Middle             | No                              | 107.30                       | \$126,000  | \$135,198                            | \$107,536                       | 5245             | 29.84            | 1565                | 748                  | 1646                 |
| 48         | 453         | 0003.04    | Middle             | No                              | 99.87                        | \$126,000  | \$125,836                            | \$100,089                       | 3068             | 33.28            | 1021                | 360                  | 1154                 |
| 48         | 453         | 0003.05    | Middle             | No                              | 101.10                       | \$126,000  | \$127,386                            | \$101,326                       | 3773             | 28.78            | 1086                | 601                  | 1518                 |
| 48         | 453         | 0003.07    | Upper              | No                              | 145.26                       | \$126,000  | \$183,028                            | \$145,577                       | 1841             | 29.33            | 540                 | 522                  | 788                  |
| 48         | 453         | 0003.08    | Upper              | No                              | 169.96                       | \$126,000  | \$214,150                            | \$170,329                       | 2698             | 43.88            | 1184                | 357                  | 426                  |
| 48         | 453         | 0003.09    | Upper              | No                              | 160.02                       | \$126,000  | \$201,625                            | \$160,368                       | 5602             | 43.11            | 2415                | 1164                 | 1295                 |
| 48         | 453         | 0004.01    | Middle             | No                              | 82.20                        | \$126,000  | \$103,572                            | \$82,383                        | 4477             | 35.63            | 1595                | 549                  | 1141                 |
| 48         | 453         | 0004.02    | Moderate           | No                              | 71.72                        | \$126,000  | \$90,367                             | \$71,875                        | 3625             | 43.97            | 1594                | 531                  | 1034                 |
| 48         | 453         | 0005.00    | Middle             | No                              | 91.02                        | \$126,000  | \$114,685                            | \$91,220                        | 4490             | 31.11            | 1397                | 299                  | 1237                 |
| 48         | 453         | 0006.01    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 8580             | 65.92            | 5656                | 0                    | 57                   |
| 48         | 453         | 0006.05    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 4645             | 45.04            | 2092                | 24                   | 140                  |
| 48         | 453         | 0006.06    | Low                | No                              | 2.49                         | \$126,000  | \$3,137                              | \$2,499                         | 5012             | 46.83            | 2347                | 41                   | 76                   |
| 48         | 453         | 0006.07    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 4268             | 51.24            | 2187                | 87                   | 317                  |
| 48         | 453         | 0006.08    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 5286             | 48.60            | 2569                | 0                    | 58                   |
| 48         | 453         | 0007.00    | Upper              | No                              | 188.11                       | \$126,000  | \$237,019                            | \$188,523                       | 1411             | 42.52            | 600                 | 300                  | 103                  |
| 48         | 453         | 0008.01    | Middle             | No                              | 100.74                       | \$126,000  | \$126,932                            | \$100,966                       | 1730             | 61.50            | 1064                | 518                  | 715                  |
| 48         | 453         | 0008.02    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 3330             | 65.98            | 2197                | 409                  | 1047                 |
| 48         | 453         | 0008.03    | Middle             | No                              | 108.14                       | \$126,000  | \$136,256                            | \$108,382                       | 3158             | 40.66            | 1284                | 711                  | 1296                 |
| 48         | 453         | 0008.04    | Moderate           | No                              | 71.00                        | \$126,000  | \$89,460                             | \$71,154                        | 2419             | 58.62            | 1418                | 491                  | 867                  |
| 48         | 453         | 0009.01    | Moderate           | No                              | 69.78                        | \$126,000  | \$87,923                             | \$69,938                        | 2719             | 55.24            | 1502                | 324                  | 702                  |

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|------------|-------------|------------|--------------------|---------------------------------|------------------------------|--|--------------------------------------|---------------------------------|------------------|------------------|---------------------|----------------------|----------------------|
| 48         | 453         | 0009.02    | Moderate           | No                              | 65.04                        | \$126,000  | \$81,950                             | \$65,185                        | 7803             | 52.03            | 4060                | 854                  | 1508                 |
| 48         | 453         | 0010.00    | Moderate           | No                              | 76.00                        | \$126,000  | \$95,760                             | \$76,167                        | 3445             | 52.31            | 1802                | 780                  | 1435                 |
| 48         | 453         | 0011.01    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 2258             | 46.37            | 1047                | 83                   | 283                  |
| 48         | 453         | 0011.02    | Upper              | No                              | 150.97                       | \$126,000  | \$190,222                            | \$151,302                       | 4013             | 23.32            | 936                 | 799                  | 0                    |
| 48         | 453         | 0011.03    | Upper              | No                              | 200.21                       | \$126,000  | \$252,265                            | \$200,643                       | 3339             | 29.86            | 997                 | 1018                 | 0                    |
| 48         | 453         | 0012.00    | Upper              | No                              | 152.81                       | \$126,000  | \$192,541                            | \$153,142                       | 6173             | 25.72            | 1588                | 1218                 | 856                  |
| 48         | 453         | 0013.04    | Upper              | No                              | 134.21                       | \$126,000  | \$169,105                            | \$134,500                       | 4087             | 25.35            | 1036                | 1057                 | 1712                 |
| 48         | 453         | 0013.07    | Moderate           | No                              | 71.09                        | \$126,000  | \$89,573                             | \$71,250                        | 3743             | 42.43            | 1588                | 769                  | 1651                 |
| 48         | 453         | 0013.08    | Upper              | No                              | 140.37                       | \$126,000  | \$176,866                            | \$140,673                       | 2927             | 36.08            | 1056                | 621                  | 1052                 |
| 48         | 453         | 0013.09    | Upper              | No                              | 183.35                       | \$126,000  | \$231,021                            | \$183,750                       | 2707             | 21.68            | 587                 | 702                  | 682                  |
| 48         | 453         | 0013.10    | Upper              | No                              | 136.63                       | \$126,000  | \$172,154                            | \$136,932                       | 3489             | 27.80            | 970                 | 583                  | 681                  |
| 48         | 453         | 0013.11    | Middle             | No                              | 113.97                       | \$126,000  | \$143,602                            | \$114,217                       | 1656             | 26.51            | 439                 | 86                   | 197                  |
| 48         | 453         | 0013.12    | Upper              | No                              | 128.08                       | \$126,000  | \$161,381                            | \$128,359                       | 4575             | 40.81            | 1867                | 1200                 | 1772                 |
| 48         | 453         | 0014.01    | Upper              | No                              | 154.66                       | \$126,000  | \$194,872                            | \$155,000                       | 2876             | 22.57            | 649                 | 496                  | 823                  |
| 48         | 453         | 0014.02    | Upper              | No                              | 165.89                       | \$126,000  | \$209,021                            | \$166,250                       | 2552             | 24.53            | 626                 | 775                  | 1117                 |
| 48         | 453         | 0014.03    | Middle             | No                              | 99.96                        | \$126,000  | \$125,950                            | \$100,179                       | 1391             | 37.74            | 525                 | 285                  | 523                  |
| 48         | 453         | 0015.01    | Upper              | No                              | 140.26                       | \$126,000  | \$176,728                            | \$140,565                       | 5457             | 21.75            | 1187                | 1786                 | 2145                 |
| 48         | 453         | 0015.03    | Moderate           | No                              | 78.85                        | \$126,000  | \$99,351                             | \$79,028                        | 4802             | 40.48            | 1944                | 680                  | 1518                 |
| 48         | 453         | 0015.04    | Upper              | No                              | 158.82                       | \$126,000  | \$200,113                            | \$159,167                       | 6374             | 32.76            | 2088                | 1317                 | 1910                 |
| 48         | 453         | 0015.05    | Middle             | No                              | 100.47                       | \$126,000  | \$126,592                            | \$100,694                       | 4843             | 27.63            | 1338                | 1028                 | 1760                 |
| 48         | 453         | 0016.02    | Upper              | No                              | 146.18                       | \$126,000  | \$184,187                            | \$146,500                       | 3084             | 35.96            | 1109                | 424                  | 838                  |
| 48         | 453         | 0016.03    | Upper              | No                              | 176.30                       | \$126,000  | \$222,138                            | \$176,688                       | 4789             | 12.88            | 617                 | 1395                 | 1964                 |
| 48         | 453         | 0016.04    | Upper              | No                              | 249.46                       | \$126,000  | \$314,320                            | \$250,001                       | 4147             | 14.66            | 608                 | 1519                 | 1840                 |
| 48         | 453         | 0016.05    | Upper              | No                              | 141.47                       | \$126,000  | \$178,252                            | \$141,776                       | 3889             | 20.08            | 781                 | 1327                 | 1819                 |
| 48         | 453         | 0016.06    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 228              | 26.75            | 61                  | 0                    | 0                    |
| 48         | 453         | 0019.10    | Upper              | No                              | 167.46                       | \$126,000  | \$211,000                            | \$167,823                       | 4914             | 26.43            | 1299                | 1106                 | 1447                 |
| 48         | 453         | 0019.11    | Middle             | No                              | 111.34                       | \$126,000  | \$140,288                            | \$111,583                       | 2948             | 34.46            | 1016                | 196                  | 273                  |
| 48         | 453         | 0019.12    | Upper              | No                              | 171.92                       | \$126,000  | \$216,619                            | \$172,297                       | 4385             | 25.70            | 1127                | 1037                 | 1281                 |
| 48         | 453         | 0019.13    | Upper              | No                              | 249.46                       | \$126,000  | \$314,320                            | \$250,001                       | 5009             | 22.70            | 1137                | 1550                 | 1715                 |

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|------------|-------------|------------|--------------------|---------------------------------|------------------------------|--|--------------------------------------|---------------------------------|------------------|------------------|---------------------|----------------------|----------------------|
| 48         | 453         | 0019.14    | Upper              | No                              | 154.01                       | \$126,000  | \$194,053                            | \$154,343                       | 6805             | 22.23            | 1513                | 1590                 | 1867                 |
| 48         | 453         | 0019.15    | Middle             | No                              | 119.99                       | \$126,000  | \$151,187                            | \$120,250                       | 3404             | 41.22            | 1403                | 205                  | 442                  |
| 48         | 453         | 0019.16    | Upper              | No                              | 229.95                       | \$126,000  | \$289,737                            | \$230,446                       | 3366             | 24.90            | 838                 | 798                  | 850                  |
| 48         | 453         | 0019.17    | Upper              | No                              | 206.43                       | \$126,000  | \$260,102                            | \$206,875                       | 5005             | 26.01            | 1302                | 1407                 | 1583                 |
| 48         | 453         | 0019.18    | Upper              | No                              | 198.11                       | \$126,000  | \$249,619                            | \$198,542                       | 2609             | 18.40            | 480                 | 809                  | 959                  |
| 48         | 453         | 0019.19    | Upper              | No                              | 245.30                       | \$126,000  | \$309,078                            | \$245,833                       | 3767             | 19.62            | 739                 | 1076                 | 1207                 |
| 48         | 453         | 0019.20    | Middle             | No                              | 91.05                        | \$126,000  | \$114,723                            | \$91,250                        | 6872             | 52.33            | 3596                | 1060                 | 1430                 |
| 48         | 453         | 0019.21    | Upper              | No                              | 216.84                       | \$126,000  | \$273,218                            | \$217,308                       | 3696             | 18.48            | 683                 | 1016                 | 1125                 |
| 48         | 453         | 0019.22    | Upper              | No                              | 162.15                       | \$126,000  | \$204,309                            | \$162,500                       | 2324             | 28.70            | 667                 | 481                  | 633                  |
| 48         | 453         | 0019.23    | Upper              | No                              | 142.93                       | \$126,000  | \$180,092                            | \$143,239                       | 3274             | 25.05            | 820                 | 784                  | 1248                 |
| 48         | 453         | 0020.02    | Middle             | No                              | 94.31                        | \$126,000  | \$118,831                            | \$94,514                        | 2975             | 37.04            | 1102                | 829                  | 1398                 |
| 48         | 453         | 0020.03    | Moderate           | No                              | 57.13                        | \$126,000  | \$71,984                             | \$57,262                        | 4005             | 54.21            | 2171                | 608                  | 1008                 |
| 48         | 453         | 0020.04    | Low                | No                              | 44.15                        | \$126,000  | \$55,629                             | \$44,250                        | 3041             | 38.47            | 1170                | 121                  | 220                  |
| 48         | 453         | 0020.06    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 2890             | 56.02            | 1619                | 137                  | 749                  |
| 48         | 453         | 0020.07    | Middle             | No                              | 110.90                       | \$126,000  | \$139,734                            | \$111,143                       | 2271             | 30.25            | 687                 | 478                  | 753                  |
| 48         | 453         | 0021.04    | Middle             | No                              | 109.38                       | \$126,000  | \$137,819                            | \$109,625                       | 2707             | 39.71            | 1075                | 741                  | 1056                 |
| 48         | 453         | 0021.05    | Low                | No                              | 38.09                        | \$126,000  | \$47,993                             | \$38,175                        | 4614             | 70.52            | 3254                | 294                  | 663                  |
| 48         | 453         | 0021.06    | Middle             | No                              | 116.00                       | \$126,000  | \$146,160                            | \$116,250                       | 2952             | 50.78            | 1499                | 919                  | 1206                 |
| 48         | 453         | 0021.07    | Middle             | No                              | 92.70                        | \$126,000  | \$116,802                            | \$92,904                        | 3681             | 61.80            | 2275                | 1166                 | 1668                 |
| 48         | 453         | 0021.08    | Moderate           | No                              | 72.48                        | \$126,000  | \$91,325                             | \$72,641                        | 3836             | 76.04            | 2917                | 536                  | 976                  |
| 48         | 453         | 0021.09    | Moderate           | No                              | 75.15                        | \$126,000  | \$94,689                             | \$75,313                        | 3834             | 62.94            | 2413                | 954                  | 1555                 |
| 48         | 453         | 0021.10    | Low                | No                              | 45.16                        | \$126,000  | \$56,902                             | \$45,266                        | 4278             | 72.35            | 3095                | 690                  | 1271                 |
| 48         | 453         | 0021.11    | Moderate           | No                              | 50.22                        | \$126,000  | \$63,277                             | \$50,333                        | 4987             | 71.37            | 3559                | 1002                 | 1841                 |
| 48         | 453         | 0021.12    | Low                | No                              | 45.24                        | \$126,000  | \$57,002                             | \$45,341                        | 5236             | 66.42            | 3478                | 762                  | 1480                 |
| 48         | 453         | 0021.13    | Middle             | No                              | 94.91                        | \$126,000  | \$119,587                            | \$95,115                        | 3484             | 53.93            | 1879                | 936                  | 1277                 |
| 48         | 453         | 0022.01    | Low                | No                              | 49.76                        | \$126,000  | \$62,698                             | \$49,868                        | 2114             | 84.96            | 1796                | 374                  | 756                  |
| 48         | 453         | 0022.11    | Middle             | No                              | 105.20                       | \$126,000  | \$132,552                            | \$105,428                       | 3592             | 80.12            | 2878                | 814                  | 1239                 |
| 48         | 453         | 0022.13    | Low                | No                              | 40.36                        | \$126,000  | \$50,854                             | \$40,449                        | 5253             | 83.32            | 4377                | 940                  | 1243                 |

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|------------|-------------|------------|--------------------|---------------------------------|------------------------------|--|--------------------------------------|---------------------------------|------------------|------------------|---------------------|----------------------|----------------------|
| 48         | 453         | 0022.14    | Moderate           | No                              | 62.87                        | \$126,000  | \$79,216                             | \$63,013                        | 3624             | 81.57            | 2956                | 662                  | 819                  |
| 48         | 453         | 0022.15    | Moderate           | No                              | 61.24                        | \$126,000  | \$77,162                             | \$61,378                        | 4182             | 88.16            | 3687                | 482                  | 674                  |
| 48         | 453         | 0022.16    | Moderate           | No                              | 66.34                        | \$126,000  | \$83,588                             | \$66,490                        | 10133            | 79.97            | 8103                | 2266                 | 2730                 |
| 48         | 453         | 0022.17    | Moderate           | No                              | 75.04                        | \$126,000  | \$94,550                             | \$75,208                        | 5967             | 77.91            | 4649                | 1282                 | 1651                 |
| 48         | 453         | 0022.18    | Moderate           | No                              | 76.06                        | \$126,000  | \$95,836                             | \$76,229                        | 5160             | 81.96            | 4229                | 1000                 | 1403                 |
| 48         | 453         | 0022.19    | Moderate           | No                              | 75.83                        | \$126,000  | \$95,546                             | \$76,000                        | 6614             | 74.45            | 4924                | 1376                 | 1598                 |
| 48         | 453         | 0022.20    | Low                | No                              | 28.67                        | \$126,000  | \$36,124                             | \$28,736                        | 3795             | 93.15            | 3535                | 193                  | 350                  |
| 48         | 453         | 0022.21    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 2709             | 95.13            | 2577                | 217                  | 300                  |
| 48         | 453         | 0022.22    | Moderate           | No                              | 50.76                        | \$126,000  | \$63,958                             | \$50,875                        | 4214             | 94.00            | 3961                | 611                  | 982                  |
| 48         | 453         | 0023.04    | Upper              | No                              | 126.79                       | \$126,000  | \$159,755                            | \$127,067                       | 4166             | 37.45            | 1560                | 50                   | 71                   |
| 48         | 453         | 0023.07    | Moderate           | No                              | 63.00                        | \$126,000  | \$79,380                             | \$63,140                        | 5325             | 56.02            | 2983                | 522                  | 890                  |
| 48         | 453         | 0023.10    | Low                | No                              | 40.64                        | \$126,000  | \$51,206                             | \$40,737                        | 3090             | 90.32            | 2791                | 410                  | 852                  |
| 48         | 453         | 0023.13    | Low                | No                              | 37.28                        | \$126,000  | \$46,973                             | \$37,361                        | 4192             | 63.33            | 2655                | 226                  | 599                  |
| 48         | 453         | 0023.14    | Moderate           | No                              | 56.77                        | \$126,000  | \$71,530                             | \$56,901                        | 5999             | 62.43            | 3745                | 194                  | 456                  |
| 48         | 453         | 0023.15    | Low                | No                              | 27.19                        | \$126,000  | \$34,259                             | \$27,255                        | 3027             | 70.17            | 2124                | 249                  | 241                  |
| 48         | 453         | 0023.16    | Low                | No                              | 42.73                        | \$126,000  | \$53,840                             | \$42,823                        | 4737             | 72.73            | 3445                | 11                   | 328                  |
| 48         | 453         | 0023.19    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 2330             | 65.84            | 1534                | 0                    | 0                    |
| 48         | 453         | 0023.20    | Moderate           | No                              | 55.57                        | \$126,000  | \$70,018                             | \$55,698                        | 3940             | 79.77            | 3143                | 475                  | 804                  |
| 48         | 453         | 0023.21    | Low                | No                              | 39.57                        | \$126,000  | \$49,858                             | \$39,659                        | 4725             | 85.16            | 4024                | 587                  | 1014                 |
| 48         | 453         | 0023.22    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 2011             | 62.36            | 1254                | 78                   | 550                  |
| 48         | 453         | 0023.23    | Moderate           | No                              | 56.34                        | \$126,000  | \$70,988                             | \$56,463                        | 4470             | 53.49            | 2391                | 390                  | 1143                 |
| 48         | 453         | 0023.24    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 1671             | 73.37            | 1226                | 28                   | 125                  |
| 48         | 453         | 0023.25    | Low                | No                              | 43.58                        | \$126,000  | \$54,911                             | \$43,676                        | 4352             | 82.84            | 3605                | 646                  | 1077                 |
| 48         | 453         | 0023.26    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 1307             | 69.47            | 908                 | 44                   | 44                   |
| 48         | 453         | 0023.27    | Moderate           | No                              | 65.61                        | \$126,000  | \$82,669                             | \$65,758                        | 4321             | 68.46            | 2958                | 144                  | 768                  |
| 48         | 453         | 0024.03    | Middle             | No                              | 94.32                        | \$126,000  | \$118,843                            | \$94,531                        | 2706             | 54.99            | 1488                | 606                  | 952                  |
| 48         | 453         | 0024.07    | Middle             | No                              | 100.20                       | \$126,000  | \$126,252                            | \$100,417                       | 9856             | 53.02            | 5226                | 1594                 | 2099                 |
| 48         | 453         | 0024.09    | Middle             | No                              | 98.60                        | \$126,000  | \$124,236                            | \$98,816                        | 3327             | 52.78            | 1756                | 1014                 | 1378                 |
| 48         | 453         | 0024.10    | Moderate           | No                              | 63.61                        | \$126,000  | \$80,149                             | \$63,750                        | 3542             | 64.34            | 2279                | 514                  | 1373                 |

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|------------|-------------|------------|--------------------|---------------------------------|------------------------------|--|--------------------------------------|---------------------------------|------------------|------------------|---------------------|----------------------|----------------------|
| 48         | 453         | 0024.11    | Moderate           | No                              | 50.42                        | \$126,000  | \$63,529                             | \$50,538                        | 5730             | 89.23            | 5113                | 793                  | 1492                 |
| 48         | 453         | 0024.12    | Moderate           | No                              | 60.45                        | \$126,000  | \$76,167                             | \$60,586                        | 5109             | 89.29            | 4562                | 840                  | 1411                 |
| 48         | 453         | 0024.13    | Low                | No                              | 46.04                        | \$126,000  | \$58,010                             | \$46,149                        | 4193             | 91.39            | 3832                | 409                  | 1046                 |
| 48         | 453         | 0024.19    | Low                | No                              | 36.17                        | \$126,000  | \$45,574                             | \$36,250                        | 4839             | 82.19            | 3977                | 10                   | 85                   |
| 48         | 453         | 0024.22    | Middle             | No                              | 85.44                        | \$126,000  | \$107,654                            | \$85,629                        | 6118             | 60.35            | 3692                | 1667                 | 2306                 |
| 48         | 453         | 0024.23    | Middle             | No                              | 96.63                        | \$126,000  | \$121,754                            | \$96,840                        | 6457             | 53.68            | 3466                | 1907                 | 2771                 |
| 48         | 453         | 0024.24    | Moderate           | No                              | 61.51                        | \$126,000  | \$77,503                             | \$61,645                        | 3500             | 52.71            | 1845                | 866                  | 1256                 |
| 48         | 453         | 0024.30    | Moderate           | No                              | 66.01                        | \$126,000  | \$83,173                             | \$66,161                        | 2267             | 84.16            | 1908                | 497                  | 791                  |
| 48         | 453         | 0024.32    | Middle             | No                              | 97.89                        | \$126,000  | \$123,341                            | \$98,107                        | 4097             | 64.78            | 2654                | 836                  | 1114                 |
| 48         | 453         | 0024.34    | Moderate           | No                              | 53.11                        | \$126,000  | \$66,919                             | \$53,233                        | 2110             | 75.73            | 1598                | 407                  | 536                  |
| 48         | 453         | 0024.36    | Moderate           | No                              | 59.49                        | \$126,000  | \$74,957                             | \$59,625                        | 3054             | 87.33            | 2667                | 552                  | 799                  |
| 48         | 453         | 0024.37    | Moderate           | No                              | 52.00                        | \$126,000  | \$65,520                             | \$52,115                        | 4432             | 59.75            | 2648                | 628                  | 787                  |
| 48         | 453         | 0024.38    | Middle             | No                              | 109.42                       | \$126,000  | \$137,869                            | \$109,659                       | 7319             | 56.89            | 4164                | 1306                 | 1742                 |
| 48         | 453         | 0024.39    | Middle             | No                              | 87.21                        | \$126,000  | \$109,885                            | \$87,400                        | 3265             | 81.87            | 2673                | 877                  | 1157                 |
| 48         | 453         | 0024.40    | Moderate           | No                              | 76.42                        | \$126,000  | \$96,289                             | \$76,591                        | 6905             | 74.50            | 5144                | 1487                 | 1833                 |
| 48         | 453         | 0024.41    | Moderate           | No                              | 64.29                        | \$126,000  | \$81,005                             | \$64,438                        | 5407             | 87.26            | 4718                | 836                  | 1425                 |
| 48         | 453         | 0024.42    | Middle             | No                              | 83.25                        | \$126,000  | \$104,895                            | \$83,430                        | 3426             | 85.90            | 2943                | 811                  | 1103                 |
| 48         | 453         | 0024.43    | Moderate           | No                              | 65.77                        | \$126,000  | \$82,870                             | \$65,917                        | 4088             | 57.41            | 2347                | 148                  | 587                  |
| 48         | 453         | 0024.44    | Middle             | No                              | 88.41                        | \$126,000  | \$111,397                            | \$88,603                        | 4226             | 57.64            | 2436                | 1127                 | 1579                 |
| 48         | 453         | 0024.45    | Middle             | No                              | 93.18                        | \$126,000  | \$117,407                            | \$93,383                        | 8161             | 67.77            | 5531                | 1464                 | 1609                 |
| 48         | 453         | 0024.46    | Upper              | No                              | 133.81                       | \$126,000  | \$168,601                            | \$134,098                       | 1453             | 29.87            | 434                 | 697                  | 768                  |
| 48         | 453         | 0024.47    | Moderate           | No                              | 65.80                        | \$126,000  | \$82,908                             | \$65,947                        | 3393             | 80.99            | 2748                | 471                  | 808                  |
| 48         | 453         | 0024.48    | Middle             | No                              | 93.40                        | \$126,000  | \$117,684                            | \$93,607                        | 7222             | 72.64            | 5246                | 1995                 | 2398                 |
| 48         | 453         | 0024.49    | Middle             | No                              | 96.51                        | \$126,000  | \$121,603                            | \$96,726                        | 6501             | 89.59            | 5824                | 1837                 | 2206                 |
| 48         | 453         | 0024.50    | Moderate           | No                              | 62.18                        | \$126,000  | \$78,347                             | \$62,319                        | 3538             | 87.68            | 3102                | 346                  | 659                  |
| 48         | 453         | 0024.51    | Moderate           | No                              | 75.04                        | \$126,000  | \$94,550                             | \$75,208                        | 7587             | 62.38            | 4733                | 907                  | 1304                 |
| 48         | 453         | 0024.52    | Moderate           | No                              | 51.34                        | \$126,000  | \$64,688                             | \$51,458                        | 2180             | 85.73            | 1869                | 776                  | 858                  |
| 48         | 453         | 0024.53    | Moderate           | No                              | 67.15                        | \$126,000  | \$84,609                             | \$67,297                        | 6085             | 82.24            | 5004                | 1516                 | 1826                 |

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|------------|-------------|------------|--------------------|---------------------------------|------------------------------|--|--------------------------------------|---------------------------------|------------------|------------------|---------------------|----------------------|----------------------|
| 48         | 453         | 0025.00    | Middle             | No                              | 103.87                       | \$126,000  | \$130,876                            | \$104,095                       | 5540             | 36.10            | 2000                | 1118                 | 1677                 |
| 48         | 453         | 0300.00    | Upper              | No                              | 193.80                       | \$126,000  | \$244,188                            | \$194,219                       | 4933             | 20.66            | 1019                | 1492                 | 1559                 |
| 48         | 453         | 0301.00    | Upper              | No                              | 142.54                       | \$126,000  | \$179,600                            | \$142,852                       | 3607             | 28.67            | 1034                | 1149                 | 1132                 |
| 48         | 453         | 0302.00    | Upper              | No                              | 133.81                       | \$126,000  | \$168,601                            | \$134,099                       | 4754             | 29.22            | 1389                | 1334                 | 1871                 |
| 48         | 453         | 0303.00    | Middle             | No                              | 94.79                        | \$126,000  | \$119,435                            | \$95,000                        | 4238             | 38.93            | 1650                | 1132                 | 1712                 |
| 48         | 453         | 0304.00    | Middle             | No                              | 89.51                        | \$126,000  | \$112,783                            | \$89,705                        | 4560             | 38.33            | 1748                | 1169                 | 1743                 |
| 48         | 453         | 0305.00    | Upper              | No                              | 155.07                       | \$126,000  | \$195,388                            | \$155,406                       | 6521             | 32.02            | 2088                | 1775                 | 1970                 |
| 48         | 453         | 0306.00    | Upper              | No                              | 129.08                       | \$126,000  | \$162,641                            | \$129,366                       | 5879             | 30.96            | 1820                | 1483                 | 1858                 |
| 48         | 453         | 0307.00    | Upper              | No                              | 171.63                       | \$126,000  | \$216,254                            | \$172,000                       | 3979             | 22.29            | 887                 | 1682                 | 1899                 |
| 48         | 453         | 0308.00    | Middle             | No                              | 116.93                       | \$126,000  | \$147,332                            | \$117,188                       | 3893             | 42.33            | 1648                | 397                  | 703                  |
| 48         | 453         | 0309.00    | Middle             | No                              | 102.80                       | \$126,000  | \$129,528                            | \$103,030                       | 7195             | 42.03            | 3024                | 2219                 | 3286                 |
| 48         | 453         | 0310.00    | Middle             | No                              | 83.98                        | \$126,000  | \$105,815                            | \$84,167                        | 4981             | 46.50            | 2316                | 1197                 | 1821                 |
| 48         | 453         | 0311.00    | Upper              | No                              | 131.09                       | \$126,000  | \$165,173                            | \$131,381                       | 4241             | 30.75            | 1304                | 1478                 | 1548                 |
| 48         | 453         | 0312.00    | Upper              | No                              | 147.24                       | \$126,000  | \$185,522                            | \$147,563                       | 6661             | 28.93            | 1927                | 2543                 | 2841                 |
| 48         | 453         | 0313.00    | Upper              | No                              | 132.24                       | \$126,000  | \$166,622                            | \$132,528                       | 4527             | 38.37            | 1737                | 920                  | 1197                 |
| 48         | 453         | 0314.00    | Upper              | No                              | 125.44                       | \$126,000  | \$158,054                            | \$125,714                       | 4783             | 31.57            | 1510                | 1149                 | 1610                 |
| 48         | 453         | 0315.00    | Upper              | No                              | 132.88                       | \$126,000  | \$167,429                            | \$133,173                       | 7498             | 37.61            | 2820                | 2018                 | 2814                 |
| 48         | 453         | 0316.00    | Upper              | No                              | 142.51                       | \$126,000  | \$179,563                            | \$142,823                       | 2365             | 33.19            | 785                 | 717                  | 1006                 |
| 48         | 453         | 0317.00    | Middle             | No                              | 102.79                       | \$126,000  | \$129,515                            | \$103,015                       | 4509             | 43.20            | 1948                | 1188                 | 1599                 |
| 48         | 453         | 0318.00    | Moderate           | No                              | 70.35                        | \$126,000  | \$88,641                             | \$70,509                        | 5255             | 48.87            | 2568                | 1143                 | 1848                 |
| 48         | 453         | 0319.00    | Middle             | No                              | 113.38                       | \$126,000  | \$142,859                            | \$113,627                       | 6160             | 43.41            | 2674                | 1350                 | 2009                 |
| 48         | 453         | 0320.00    | Middle             | No                              | 94.71                        | \$126,000  | \$119,335                            | \$94,919                        | 6301             | 50.48            | 3181                | 880                  | 1541                 |
| 48         | 453         | 0321.00    | Middle             | No                              | 81.82                        | \$126,000  | \$103,093                            | \$81,997                        | 5434             | 46.28            | 2515                | 857                  | 966                  |
| 48         | 453         | 0322.00    | Upper              | No                              | 188.84                       | \$126,000  | \$237,938                            | \$189,250                       | 2251             | 16.97            | 382                 | 819                  | 910                  |
| 48         | 453         | 0323.00    | Moderate           | No                              | 56.00                        | \$126,000  | \$70,560                             | \$56,129                        | 3908             | 56.32            | 2201                | 49                   | 321                  |
| 48         | 453         | 0324.00    | Upper              | No                              | 121.04                       | \$126,000  | \$152,510                            | \$121,304                       | 1558             | 51.93            | 809                 | 11                   | 20                   |
| 48         | 453         | 0325.00    | Upper              | No                              | 142.75                       | \$126,000  | \$179,865                            | \$143,063                       | 4759             | 35.26            | 1678                | 1103                 | 1458                 |
| 48         | 453         | 0326.00    | Upper              | No                              | 183.66                       | \$126,000  | \$231,412                            | \$184,063                       | 5829             | 46.89            | 2733                | 2119                 | 2300                 |
| 48         | 453         | 0327.00    | Upper              | No                              | 147.55                       | \$126,000  | \$185,913                            | \$147,874                       | 4159             | 35.92            | 1494                | 1367                 | 1808                 |

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|------------|-------------|------------|--------------------|---------------------------------|------------------------------|--|--------------------------------------|---------------------------------|------------------|------------------|---------------------|----------------------|----------------------|
| 48         | 453         | 0328.00    | Upper              | No                              | 137.49                       | \$126,000  | \$173,237                            | \$137,794                       | 2206             | 27.33            | 603                 | 676                  | 781                  |
| 48         | 453         | 0329.00    | Upper              | No                              | 170.92                       | \$126,000  | \$215,359                            | \$171,290                       | 7748             | 29.13            | 2257                | 2175                 | 2226                 |
| 48         | 453         | 0330.00    | Upper              | No                              | 123.42                       | \$126,000  | \$155,509                            | \$123,686                       | 7074             | 32.51            | 2300                | 1835                 | 2125                 |
| 48         | 453         | 0331.00    | Upper              | No                              | 142.06                       | \$126,000  | \$178,996                            | \$142,375                       | 4710             | 15.92            | 750                 | 1794                 | 2051                 |
| 48         | 453         | 0332.00    | Middle             | No                              | 107.44                       | \$126,000  | \$135,374                            | \$107,673                       | 5068             | 54.54            | 2764                | 1260                 | 1629                 |
| 48         | 453         | 0333.00    | Upper              | No                              | 176.22                       | \$126,000  | \$222,037                            | \$176,607                       | 9564             | 38.37            | 3670                | 2721                 | 2983                 |
| 48         | 453         | 0334.00    | Middle             | No                              | 91.83                        | \$126,000  | \$115,706                            | \$92,031                        | 2720             | 38.53            | 1048                | 931                  | 1350                 |
| 48         | 453         | 0335.00    | Middle             | No                              | 109.66                       | \$126,000  | \$138,172                            | \$109,905                       | 5460             | 40.55            | 2214                | 1814                 | 2069                 |
| 48         | 453         | 0336.00    | Upper              | No                              | 134.62                       | \$126,000  | \$169,621                            | \$134,911                       | 4819             | 20.38            | 982                 | 1405                 | 1813                 |
| 48         | 453         | 0337.00    | Upper              | No                              | 161.66                       | \$126,000  | \$203,692                            | \$162,008                       | 2495             | 32.83            | 819                 | 839                  | 941                  |
| 48         | 453         | 0338.00    | Upper              | No                              | 178.44                       | \$126,000  | \$224,834                            | \$178,828                       | 5004             | 50.38            | 2521                | 1558                 | 1643                 |
| 48         | 453         | 0339.00    | Upper              | No                              | 154.32                       | \$126,000  | \$194,443                            | \$154,653                       | 5638             | 25.29            | 1426                | 1642                 | 1937                 |
| 48         | 453         | 0340.00    | Upper              | No                              | 144.68                       | \$126,000  | \$182,297                            | \$145,000                       | 7381             | 39.15            | 2890                | 1403                 | 1543                 |
| 48         | 453         | 0341.00    | Moderate           | No                              | 71.88                        | \$126,000  | \$90,569                             | \$72,038                        | 5615             | 59.82            | 3359                | 568                  | 795                  |
| 48         | 453         | 0342.00    | Middle             | No                              | 89.11                        | \$126,000  | \$112,279                            | \$89,306                        | 6365             | 67.23            | 4279                | 355                  | 1319                 |
| 48         | 453         | 0343.00    | Upper              | No                              | 180.42                       | \$126,000  | \$227,329                            | \$180,813                       | 4893             | 44.31            | 2168                | 1426                 | 1511                 |
| 48         | 453         | 0344.00    | Upper              | No                              | 207.08                       | \$126,000  | \$260,921                            | \$207,531                       | 3378             | 48.67            | 1644                | 231                  | 353                  |
| 48         | 453         | 0345.00    | Upper              | No                              | 188.57                       | \$126,000  | \$237,598                            | \$188,977                       | 2346             | 59.63            | 1399                | 787                  | 787                  |
| 48         | 453         | 0346.00    | Moderate           | No                              | 61.78                        | \$126,000  | \$77,843                             | \$61,921                        | 4889             | 51.30            | 2508                | 172                  | 442                  |
| 48         | 453         | 0347.00    | Upper              | No                              | 129.31                       | \$126,000  | \$162,931                            | \$129,597                       | 5683             | 31.37            | 1783                | 1910                 | 2072                 |
| 48         | 453         | 0348.00    | Upper              | No                              | 136.56                       | \$126,000  | \$172,066                            | \$136,863                       | 5129             | 36.52            | 1873                | 1565                 | 1716                 |
| 48         | 453         | 0349.00    | Upper              | No                              | 203.31                       | \$126,000  | \$256,171                            | \$203,750                       | 7596             | 31.00            | 2355                | 2071                 | 2290                 |
| 48         | 453         | 0350.00    | Upper              | No                              | 215.66                       | \$126,000  | \$271,732                            | \$216,133                       | 7266             | 37.30            | 2710                | 1480                 | 1699                 |
| 48         | 453         | 0351.00    | Upper              | No                              | 249.46                       | \$126,000  | \$314,320                            | \$250,001                       | 4242             | 32.32            | 1371                | 1037                 | 1094                 |
| 48         | 453         | 0352.00    | Middle             | No                              | 119.32                       | \$126,000  | \$150,343                            | \$119,583                       | 3999             | 16.30            | 652                 | 937                  | 1656                 |
| 48         | 453         | 0353.00    | Upper              | No                              | 166.67                       | \$126,000  | \$210,004                            | \$167,031                       | 2022             | 17.95            | 363                 | 451                  | 806                  |
| 48         | 453         | 0354.00    | Upper              | No                              | 209.06                       | \$126,000  | \$263,416                            | \$209,519                       | 5518             | 22.58            | 1246                | 1140                 | 1284                 |
| 48         | 453         | 0355.00    | Upper              | No                              | 155.81                       | \$126,000  | \$196,321                            | \$156,148                       | 4437             | 29.19            | 1295                | 1282                 | 1282                 |

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|------------|-------------|------------|--------------------|---------------------------------|------------------------------|--|--------------------------------------|---------------------------------|------------------|------------------|---------------------|----------------------|----------------------|
| 48         | 453         | 0356.00    | Upper              | No                              | 164.97                       | \$126,000  | \$207,862                            | \$165,327                       | 2033             | 24.35            | 495                 | 611                  | 919                  |
| 48         | 453         | 0357.00    | Upper              | No                              | 196.91                       | \$126,000  | \$248,107                            | \$197,341                       | 4785             | 29.78            | 1425                | 1457                 | 1540                 |
| 48         | 453         | 0358.00    | Upper              | No                              | 162.46                       | \$126,000  | \$204,700                            | \$162,813                       | 4420             | 39.30            | 1737                | 975                  | 1009                 |
| 48         | 453         | 0359.00    | Middle             | No                              | 83.66                        | \$126,000  | \$105,412                            | \$83,846                        | 3176             | 35.86            | 1139                | 778                  | 909                  |
| 48         | 453         | 0360.00    | Upper              | No                              | 209.59                       | \$126,000  | \$264,083                            | \$210,042                       | 1994             | 24.42            | 487                 | 568                  | 568                  |
| 48         | 453         | 0361.00    | Upper              | No                              | 184.87                       | \$126,000  | \$232,936                            | \$185,273                       | 4899             | 40.42            | 1980                | 1175                 | 1229                 |
| 48         | 453         | 0362.00    | Upper              | No                              | 143.05                       | \$126,000  | \$180,243                            | \$143,359                       | 2683             | 55.35            | 1485                | 382                  | 417                  |
| 48         | 453         | 0363.00    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 1613             | 35.15            | 567                 | 447                  | 506                  |
| 48         | 453         | 0364.00    | Upper              | No                              | 131.05                       | \$126,000  | \$165,123                            | \$131,339                       | 2299             | 21.84            | 502                 | 762                  | 1004                 |
| 48         | 453         | 0365.00    | Upper              | No                              | 160.36                       | \$126,000  | \$202,054                            | \$160,714                       | 7797             | 35.89            | 2798                | 1702                 | 1964                 |
| 48         | 453         | 0366.00    | Upper              | No                              | 146.24                       | \$126,000  | \$184,262                            | \$146,559                       | 8848             | 24.21            | 2142                | 2239                 | 2550                 |
| 48         | 453         | 0367.00    | Upper              | No                              | 205.58                       | \$126,000  | \$259,031                            | \$206,029                       | 7934             | 34.76            | 2758                | 2355                 | 2592                 |
| 48         | 453         | 0368.00    | Upper              | No                              | 165.92                       | \$126,000  | \$209,059                            | \$166,281                       | 4462             | 29.49            | 1316                | 1434                 | 1478                 |
| 48         | 453         | 0369.00    | Upper              | No                              | 174.00                       | \$126,000  | \$219,240                            | \$174,375                       | 4442             | 16.75            | 744                 | 1574                 | 1649                 |
| 48         | 453         | 0370.00    | Upper              | No                              | 128.57                       | \$126,000  | \$161,998                            | \$128,851                       | 6281             | 33.59            | 2110                | 1199                 | 1486                 |
| 48         | 453         | 0371.00    | Upper              | No                              | 172.91                       | \$126,000  | \$217,867                            | \$173,284                       | 2629             | 34.61            | 910                 | 818                  | 835                  |
| 48         | 453         | 0372.00    | Upper              | No                              | 129.24                       | \$126,000  | \$162,842                            | \$129,527                       | 6211             | 48.22            | 2995                | 1847                 | 2236                 |
| 48         | 453         | 0373.00    | Middle             | No                              | 112.25                       | \$126,000  | \$141,435                            | \$112,500                       | 3234             | 30.49            | 986                 | 771                  | 976                  |
| 48         | 453         | 0374.00    | Middle             | No                              | 89.69                        | \$126,000  | \$113,009                            | \$89,891                        | 4591             | 18.84            | 865                 | 1310                 | 1911                 |
| 48         | 453         | 0375.00    | Middle             | No                              | 105.13                       | \$126,000  | \$132,464                            | \$105,357                       | 1602             | 19.85            | 318                 | 542                  | 703                  |
| 48         | 453         | 0376.00    | Upper              | No                              | 123.73                       | \$126,000  | \$155,900                            | \$124,000                       | 3535             | 22.66            | 801                 | 1207                 | 1729                 |
| 48         | 453         | 0400.00    | Moderate           | No                              | 66.17                        | \$126,000  | \$83,374                             | \$66,314                        | 6361             | 72.24            | 4595                | 557                  | 1405                 |
| 48         | 453         | 0401.00    | Low                | No                              | 36.28                        | \$126,000  | \$45,713                             | \$36,359                        | 4302             | 78.10            | 3360                | 562                  | 1188                 |
| 48         | 453         | 0402.00    | Moderate           | No                              | 55.10                        | \$126,000  | \$69,426                             | \$55,227                        | 3013             | 79.92            | 2408                | 436                  | 787                  |
| 48         | 453         | 0403.00    | Low                | No                              | 38.90                        | \$126,000  | \$49,014                             | \$38,986                        | 7645             | 87.31            | 6675                | 714                  | 1205                 |
| 48         | 453         | 0404.00    | Middle             | No                              | 104.75                       | \$126,000  | \$131,985                            | \$104,981                       | 3962             | 34.55            | 1369                | 1161                 | 1168                 |
| 48         | 453         | 0405.00    | Moderate           | No                              | 55.81                        | \$126,000  | \$70,321                             | \$55,938                        | 5312             | 59.24            | 3147                | 1290                 | 2210                 |
| 48         | 453         | 0406.00    | Low                | No                              | 44.01                        | \$126,000  | \$55,453                             | \$44,107                        | 3929             | 81.70            | 3210                | 233                  | 781                  |
| 48         | 453         | 0407.00    | Low                | No                              | 24.15                        | \$126,000  | \$30,429                             | \$24,208                        | 7248             | 80.93            | 5866                | 604                  | 1677                 |

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|------------|-------------|------------|--------------------|---------------------------------|------------------------------|--|--------------------------------------|---------------------------------|------------------|------------------|---------------------|----------------------|----------------------|
| 48         | 453         | 0408.00    | Moderate           | No                              | 62.27                        | \$126,000  | \$78,460                             | \$62,411                        | 5056             | 68.67            | 3472                | 978                  | 1866                 |
| 48         | 453         | 0409.00    | Moderate           | No                              | 50.43                        | \$126,000  | \$63,542                             | \$50,541                        | 6562             | 82.55            | 5417                | 719                  | 1556                 |
| 48         | 453         | 0410.00    | Low                | No                              | 39.30                        | \$126,000  | \$49,518                             | \$39,388                        | 7089             | 89.87            | 6371                | 412                  | 1044                 |
| 48         | 453         | 0411.00    | Middle             | No                              | 96.73                        | \$126,000  | \$121,880                            | \$96,944                        | 1762             | 45.52            | 802                 | 487                  | 566                  |
| 48         | 453         | 0412.00    | Moderate           | No                              | 67.23                        | \$126,000  | \$84,710                             | \$67,383                        | 2811             | 58.56            | 1646                | 300                  | 573                  |
| 48         | 453         | 0413.00    | Middle             | No                              | 114.00                       | \$126,000  | \$143,640                            | \$114,255                       | 4285             | 33.86            | 1451                | 1266                 | 1820                 |
| 48         | 453         | 0414.00    | Moderate           | No                              | 78.13                        | \$126,000  | \$98,444                             | \$78,308                        | 2538             | 40.19            | 1020                | 480                  | 635                  |
| 48         | 453         | 0415.00    | Middle             | No                              | 80.51                        | \$126,000  | \$101,443                            | \$80,690                        | 2659             | 57.13            | 1519                | 624                  | 819                  |
| 48         | 453         | 0416.00    | Moderate           | No                              | 67.38                        | \$126,000  | \$84,899                             | \$67,525                        | 7549             | 77.49            | 5850                | 1643                 | 2642                 |
| 48         | 453         | 0417.00    | Middle             | No                              | 96.39                        | \$126,000  | \$121,451                            | \$96,607                        | 2158             | 51.48            | 1111                | 808                  | 1123                 |
| 48         | 453         | 0418.00    | Moderate           | No                              | 66.26                        | \$126,000  | \$83,488                             | \$66,406                        | 3675             | 59.24            | 2177                | 625                  | 1278                 |
| 48         | 453         | 0419.00    | Middle             | No                              | 99.53                        | \$126,000  | \$125,408                            | \$99,750                        | 3237             | 46.15            | 1494                | 1013                 | 1390                 |
| 48         | 453         | 0420.00    | Upper              | No                              | 123.76                       | \$126,000  | \$155,938                            | \$124,028                       | 2436             | 30.30            | 738                 | 1064                 | 1202                 |
| 48         | 453         | 0421.00    | Middle             | No                              | 84.47                        | \$126,000  | \$106,432                            | \$84,655                        | 5088             | 61.12            | 3110                | 955                  | 1569                 |
| 48         | 453         | 0422.00    | Moderate           | No                              | 78.16                        | \$126,000  | \$98,482                             | \$78,333                        | 4008             | 62.45            | 2503                | 435                  | 908                  |
| 48         | 453         | 0423.00    | Middle             | No                              | 112.81                       | \$126,000  | \$142,141                            | \$113,056                       | 3364             | 43.25            | 1455                | 1044                 | 1406                 |
| 48         | 453         | 0424.00    | Middle             | No                              | 118.59                       | \$126,000  | \$149,423                            | \$118,849                       | 11722            | 70.02            | 8208                | 3055                 | 3518                 |
| 48         | 453         | 0425.00    | Middle             | No                              | 115.12                       | \$126,000  | \$145,051                            | \$115,372                       | 7341             | 61.86            | 4541                | 1416                 | 1626                 |
| 48         | 453         | 0426.00    | Moderate           | No                              | 64.24                        | \$126,000  | \$80,942                             | \$64,388                        | 4134             | 70.20            | 2902                | 824                  | 1484                 |
| 48         | 453         | 0427.00    | Middle             | No                              | 86.23                        | \$126,000  | \$108,650                            | \$86,419                        | 4347             | 63.45            | 2758                | 1460                 | 1744                 |
| 48         | 453         | 0428.00    | Middle             | No                              | 110.23                       | \$126,000  | \$138,890                            | \$110,476                       | 6343             | 59.67            | 3785                | 1449                 | 1933                 |
| 48         | 453         | 0429.00    | Low                | No                              | 39.65                        | \$126,000  | \$49,959                             | \$39,739                        | 3218             | 70.94            | 2283                | 0                    | 178                  |
| 48         | 453         | 0430.00    | Moderate           | No                              | 70.88                        | \$126,000  | \$89,309                             | \$71,033                        | 3774             | 61.84            | 2334                | 189                  | 350                  |
| 48         | 453         | 0431.00    | Moderate           | No                              | 51.77                        | \$126,000  | \$65,230                             | \$51,886                        | 3005             | 84.06            | 2526                | 309                  | 612                  |
| 48         | 453         | 0432.00    | Moderate           | No                              | 53.04                        | \$126,000  | \$66,830                             | \$53,162                        | 2923             | 82.00            | 2397                | 377                  | 731                  |
| 48         | 453         | 0433.00    | Low                | No                              | 36.20                        | \$126,000  | \$45,612                             | \$36,280                        | 3708             | 85.36            | 3165                | 298                  | 888                  |
| 48         | 453         | 0434.00    | Moderate           | No                              | 52.93                        | \$126,000  | \$66,692                             | \$53,046                        | 3657             | 78.94            | 2887                | 179                  | 803                  |
| 48         | 453         | 0435.00    | Moderate           | No                              | 73.88                        | \$126,000  | \$93,089                             | \$74,048                        | 7281             | 68.78            | 5008                | 1256                 | 1728                 |

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|------------|-------------|------------|--------------------|---------------------------------|------------------------------|--|--------------------------------------|---------------------------------|------------------|------------------|---------------------|----------------------|----------------------|
| 48         | 453         | 0436.00    | Moderate           | No                              | 73.12                        | \$126,000  | \$92,131                             | \$73,281                        | 3854             | 66.63            | 2568                | 409                  | 798                  |
| 48         | 453         | 0437.00    | Low                | No                              | 47.51                        | \$126,000  | \$59,863                             | \$47,620                        | 2332             | 77.40            | 1805                | 241                  | 279                  |
| 48         | 453         | 0438.00    | Middle             | No                              | 105.57                       | \$126,000  | \$133,018                            | \$105,800                       | 3272             | 69.83            | 2285                | 1239                 | 1457                 |
| 48         | 453         | 0439.00    | Middle             | No                              | 85.74                        | \$126,000  | \$108,032                            | \$85,927                        | 8592             | 75.43            | 6481                | 1141                 | 1461                 |
| 48         | 453         | 0440.00    | Moderate           | No                              | 55.99                        | \$126,000  | \$70,547                             | \$56,117                        | 3167             | 70.48            | 2232                | 546                  | 689                  |
| 48         | 453         | 0441.00    | Moderate           | No                              | 76.68                        | \$126,000  | \$96,617                             | \$76,853                        | 3933             | 69.79            | 2745                | 462                  | 697                  |
| 48         | 453         | 0442.00    | Middle             | No                              | 90.82                        | \$126,000  | \$114,433                            | \$91,016                        | 5344             | 70.85            | 3786                | 224                  | 301                  |
| 48         | 453         | 0443.00    | Moderate           | No                              | 67.93                        | \$126,000  | \$85,592                             | \$68,082                        | 7018             | 84.63            | 5939                | 1284                 | 1799                 |
| 48         | 453         | 0444.00    | Middle             | No                              | 84.71                        | \$126,000  | \$106,735                            | \$84,899                        | 6540             | 69.60            | 4552                | 1731                 | 1963                 |
| 48         | 453         | 0445.00    | Middle             | No                              | 115.31                       | \$126,000  | \$145,291                            | \$115,565                       | 3172             | 52.14            | 1654                | 1372                 | 1621                 |
| 48         | 453         | 0446.00    | Moderate           | No                              | 70.11                        | \$126,000  | \$88,339                             | \$70,270                        | 5112             | 75.53            | 3861                | 1061                 | 1407                 |
| 48         | 453         | 0447.00    | Unknown            | No                              | 0.00                         | \$126,000  | \$0                                  | \$0                             | 2026             | 73.84            | 1496                | 474                  | 546                  |
| 48         | 453         | 0448.00    | Moderate           | No                              | 58.86                        | \$126,000  | \$74,164                             | \$58,987                        | 4788             | 71.24            | 3411                | 1125                 | 1106                 |
| 48         | 453         | 0449.00    | Moderate           | No                              | 54.96                        | \$126,000  | \$69,250                             | \$55,083                        | 8901             | 84.16            | 7491                | 2179                 | 2630                 |
| 48         | 453         | 0450.00    | Moderate           | No                              | 70.85                        | \$126,000  | \$89,271                             | \$71,010                        | 2554             | 71.61            | 1829                | 598                  | 715                  |
| 48         | 453         | 0451.00    | Upper              | No                              | 136.04                       | \$126,000  | \$171,410                            | \$136,335                       | 2812             | 62.09            | 1746                | 621                  | 828                  |
| 48         | 453         | 0452.00    | Middle             | No                              | 108.35                       | \$126,000  | \$136,521                            | \$108,587                       | 4226             | 54.71            | 2312                | 1112                 | 1297                 |
| 48         | 453         | 0453.00    | Upper              | No                              | 123.38                       | \$126,000  | \$155,459                            | \$123,649                       | 4120             | 55.68            | 2294                | 57                   | 0                    |
| 48         | 453         | 0454.00    | Middle             | No                              | 101.00                       | \$126,000  | \$127,260                            | \$101,218                       | 6785             | 47.47            | 3221                | 0                    | 225                  |
| 48         | 453         | 0455.00    | Moderate           | No                              | 63.09                        | \$126,000  | \$79,493                             | \$63,232                        | 2967             | 60.23            | 1787                | 352                  | 861                  |
| 48         | 453         | 0456.00    | Middle             | No                              | 115.39                       | \$126,000  | \$145,391                            | \$115,647                       | 5619             | 61.22            | 3440                | 944                  | 1384                 |
| 48         | 453         | 0457.00    | Upper              | No                              | 127.84                       | \$126,000  | \$161,078                            | \$128,115                       | 3687             | 66.78            | 2462                | 475                  | 641                  |
| 48         | 453         | 0458.00    | Moderate           | No                              | 65.97                        | \$126,000  | \$83,122                             | \$66,121                        | 2708             | 69.02            | 1869                | 754                  | 874                  |
| 48         | 453         | 0459.00    | Middle             | No                              | 95.24                        | \$126,000  | \$120,002                            | \$95,449                        | 11718            | 80.77            | 9465                | 2324                 | 2667                 |
| 48         | 453         | 0460.00    | Moderate           | No                              | 76.23                        | \$126,000  | \$96,050                             | \$76,394                        | 4899             | 68.73            | 3367                | 805                  | 1382                 |
| 48         | 453         | 0461.00    | Middle             | No                              | 98.33                        | \$126,000  | \$123,896                            | \$98,542                        | 6972             | 59.29            | 4134                | 1198                 | 1443                 |
| 48         | 453         | 0462.00    | Middle             | No                              | 113.75                       | \$126,000  | \$143,325                            | \$113,996                       | 7446             | 62.22            | 4633                | 1738                 | 2252                 |
| 48         | 453         | 0463.00    | Moderate           | No                              | 65.91                        | \$126,000  | \$83,047                             | \$66,058                        | 2175             | 38.16            | 830                 | 492                  | 680                  |
| 48         | 453         | 0464.00    | Middle             | No                              | 95.85                        | \$126,000  | \$120,771                            | \$96,065                        | 3537             | 61.01            | 2158                | 985                  | 1221                 |

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|------------|-------------|------------|--------------------|---------------------------------|------------------------------|---|--------------------------------------|---------------------------------|------------------|------------------|---------------------|----------------------|----------------------|
| 48         | 453         | 0465.00    | Middle             | No                              | 94.51                        | \$126,000   | \$119,083                            | \$94,722                        | 3407             | 66.13            | 2253                | 419                  | 539                  |
| 48         | 453         | 0466.00    | Middle             | No                              | 111.72                       | \$126,000   | \$140,767                            | \$111,968                       | 5415             | 55.42            | 3001                | 2731                 | 2811                 |
| 48         | 453         | 0467.00    | Upper              | No                              | 127.59                       | \$126,000   | \$160,763                            | \$127,869                       | 3750             | 40.83            | 1531                | 961                  | 1094                 |
| 48         | 453         | 0468.00    | Upper              | No                              | 143.20                       | \$126,000   | \$180,432                            | \$143,511                       | 11615            | 53.95            | 6266                | 2236                 | 2394                 |
| 48         | 453         | 0469.00    | Upper              | No                              | 148.26                       | \$126,000   | \$186,808                            | \$148,580                       | 9175             | 54.21            | 4974                | 2390                 | 2447                 |
| 48         | 453         | 0470.00    | Upper              | No                              | 140.22                       | \$126,000   | \$176,677                            | \$140,526                       | 1571             | 51.24            | 805                 | 485                  | 498                  |
| 48         | 453         | 9800.00    | Unknown            | No                              | 0.00                         | \$126,000   | \$0                                  | \$0                             | 3                | 100.00           | 3                   | 0                    | 0                    |

\* Will automatically be included in the 2025 Distressed or Underserved Tract List



## HMDA Disclosure Statement

Keystone Bank's annual Home Mortgage Disclosure Act (HMDA) disclosure statements, the Loan Application Register, showing the annual applications for reportable home mortgage applications are available on the following Consumer Financial Protection Bureau (CFPB) website:

[www.consumerfinance.gov/data-research/hmda/](http://www.consumerfinance.gov/data-research/hmda/)