### INTERMEDIATE SMALL BANK

### PUBLIC DISCLOSURE

July 08, 2024

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Citizens National Bank Charter Number 5484

118 South Houston Street Cameron, TX 76520

Office of the Comptroller of the Currency

225 E. John Carpenter Fwy Suite 900 Irving, TX 75062

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

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### **Overall CRA Rating**

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

The Lending test is rated: Satisfactory.

The Community Development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on:
  - The loan-to-deposit (LTD) ratio is reasonable.
  - The majority of the bank's loans are inside its Assessment Areas (AA)s.
  - The distribution of loans across geographies of different income levels is reasonable.
  - The distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- The Community Development (CD) Test rating is based on adequate responsiveness to CD needs in lending, investments, donations, and services.

#### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit ratio is reasonable. The bank's quarterly average LTD ratio during the evaluation period was 70.7 percent. We compared the bank's LTD ratio to similarly situated institutions in the area. The average LTD ratio for the peer banks was 70.3 percent.

#### **Lending in Assessment Area**

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

The bank originated and purchased 73.2 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The bank's primary products are home mortgages and small loans to businesses. The findings from this analysis factored into the overall analysis of the geographic distribution of lending by income level of the geography.

		Lendin	g Inside a	nd Outsi 2021 -	de of the A - 2023	ssessment A	Area			
	N	Number o	of Loans			Dollar A	Amount o	of Loans \$(	000s)	
Loan Category	Insi	de	Outsi	de	Total	Insid	e	Outsio	de	Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage	64	68.8	29	31.2	93	33,103	75.5	10,744	24.5	43,847
Small Business	48	80.0	12	20.0	60	9,514	57.3	7,089	42.7	16,603
Total	112	73.2	41	26.8	153	42,617	70.5	17,833	29.5	60,450

Source: Bank Data

Due to rounding, totals may not equal 100.0%

### **Description of Institution**

Citizens National Bank (Citizens), an intrastate bank is headquartered in Cameron, Texas. The bank is a wholly owned subsidiary of Central Texas Financial Corp., a one-bank holding company. The holding company also owns an affiliated finance company, Peoples Finance Company, which was not included as part of this review. Citizens is a full-service bank offering a range of deposit products and services including online banking and bill pay. The bank offers commercial real estate loans, commercial loans, farm and agriculture loans, mortgage loans, and business lines of credit. Citizens offers secured and unsecured small dollar personal loans to qualified customers.

As of December 31, 2023, Citizens reported total assets of \$612.7 million, total liabilities of \$551.5 million, and capital of \$61.2 million. Total loans of \$433.9 million represented 70.8 percent of assets. Commercial real estate and commercial loans represented 81.2 of total loans while mortgage loans accounted for 18.2 percent. Farm and agriculture loans represented 13.4 percent of loans. Consumer loans represented only 0.7 percent of total loans. Total investments were \$157.1 million. Tier one capital totaled \$65.7 million. As the numbers reflect, the bank's primary focus is commercial and commercial real estate lending.

Citizens operates in 11 locations, six branches including the main office in the Milam and Lee AA and five branches in the Williamson and Travis AA. During the evaluation period, the bank opened two branches, one in Round Rock, Texas, in a moderate-income CT, in January 2023 and the other branch is in Killeen, Texas, outside of the bank's AA (Bell County-moderate-income CT), in November 2023. The bank also closed one branch, located in the Williamson and Travis AA, moderate-income CT, in January 2023.

Three branches and all three motor banks each have an automated teller machine (ATM) with 24-hour access. The ATMs are cash-dispensing ATMs. Citizens' banking programs and hours allow the bank to deliver needed banking and credit services to low- and moderate-income (LMI) areas and customers, as well as small business owners throughout the bank's AAs. Hours are commensurate with those of peer banks. Citizens offers online banking through its website, *cnbanktexas.com*. Bank customers can utilize online banking and the mobile application at no charge. ATM services are available in English and Spanish. The main office and the branches either have employees who speak Spanish or can readily access employees at other bank locations as needed.

Citizens' physical offices are its primary delivery system for retail products and services:

#### Milam and Lee AA

- 104 W. Austin, Giddings, Texas 78942 Moderate (Lee)
- 140 E. Cameron, Rockdale, Texas 76567 Middle (Milam)
- 118 S. Houston, Cameron, Texas 76520 (Main Office) Middle (Milam)
- 500 N. Travis, Cameron, Texas 76520 Middle (Milam)
- 237 S. Main, Giddings, Texas 78942 Moderate (Lee)
- 1401 W. Cameron, Rockdale, Texas 76567 Middle (Milam)

#### Williamson and Travis AA

- 12128 Ranch Road 620 N., Austin, Texas 78750 Upper (Williamson)
- 110 S May St., Round Rock, Texas 78664 Moderate (Williamson)
- 102 Hoxie Street, Coupland, Texas 78615 Middle (Williamson)
- 601 FM 685 Pflugerville, Texas 78660 Upper (Travis)
- 316 N. Main Taylor, Texas 76574 Low (Williamson)

Citizens has two AAs located in Texas that will be assessed under this evaluation:

- Milam and Lee AA entire counties.
- Williamson and Travis AA entire counties.

The AAs meet the requirements of the CRA regulation and do not arbitrarily exclude any low- or moderate-income geographies. Based on the financial condition, size, product offerings, and branch network, there are no legal, financial, or other factors that inhibit Citizen's ability to help meet credit needs in its AAs. The prior examination dated June 7, 2021, assigned an overall "Satisfactory" rating.

### **Scope of the Evaluation**

#### **Evaluation Period/Products Evaluated**

This Performance Evaluation (PE) assesses the bank's performance under the Lending Test and the CD Test. In evaluating the bank's lending performance, we reviewed home mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA), a sampling of home mortgage loans for 2021, a sampling of 2021-2023 small loans to businesses, and CD loans. We also evaluated CRA qualified investments including donations and grants as well as retail and CD services.

The evaluation period is January 1, 2021, through December 31, 2023. Our conclusions related to CD loans, qualified investments including donations, and CD services were based on the number and dollar amounts made during the evaluation period. For geographic and borrower distribution analyses, 2021 mortgage loans were compared to the 2015 American Community Survey (ACS) Census data and 2022 and 2023 mortgage loans to the 2020 ACS Census data. Small loans to businesses were compared to the 2021 and 2022 Dun & Bradstreet (D&B) data.

#### **Selection of Areas for Full-Scope Review**

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

AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

As noted in the Description of Institution, the bank has two assessment areas. The Milam and Lee AA and the Williamson and Travis AA. Based on the Deposit Market Share Report, as of June 30, 2023, the bank had 11 branches in these two AAs with total deposits of \$548.1 million. The Williamson and Travis AA had five offices with \$269.2 million in deposits or 49.1 percent. The Milam and Lee AA had six offices with \$278.9 million in deposits or 50.9 percent. The bank opened and closed a branch in Round Rock, TX in January 2023 (part of the Williamson and Travis AA). We have selected the Milam and Lee AA as the full scope AA and the Williamson and Travis Counties AA as the limited scope AA.

#### **Ratings**

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings. Citizens' overall rating is based on its performance in the State of Texas. The state rating is based on performance in all bank AAs with the most weight placed on the full-scope AA. For the geographic and borrower distribution of loans under the Lending Test, consideration was given to the number of loans and dollar volume of loans originated in each category. Small loans to businesses received the most weight and then home mortgage loans were considered. The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

### **Discriminatory or Other Illegal Credit Practices Review**

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

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

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

### **State Rating**

#### **State of Texas**

CRA rating for the State of Texas<sup>1</sup>: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The Lending Test and the CD Test rating is based primarily on the bank's performance in the full-scope AA. The bank's performance in the limited-scope AA was evaluated to determine if the performance impacted the overall rating.

The major factors that support this rating include:

- The geographic distribution of loans across low- and moderate-income census tracts (CTs) is reasonable.
- The distribution of loans to low- and moderate-income borrowers and businesses of different sizes is reasonable.
- CD activities reflect adequate responsiveness to CD needs.

#### **Description of Institution's Operations in Texas**

The bank operates in two AAs in the State of Texas as described in the "Description of the Institution" and the "Scope of Evaluation" sections of this PE. The bank's primary lending focus is business and home mortgage loans. Competitors include local community banks and large banks that have a nationwide footprint, as well as credit unions and nonbank financial entities that compete for residential, business, and consumer loans.

Community credit needs in the full-scope AA were determined by reviewing recent housing and demographic information, CRA PEs from other banks operating in the bank's AAs, and community contacts with organizations that provide services within the full-scope AA.

#### Milam and Lee AA

The bank's main office and five branches are located in the Milam and Lee AA. The AA is comprised of the entire counties of Milam and Lee. The AA contains 11 CTs, of which 18.2 percent are moderate-income, 72.7 percent are middle-income, and 9.1 percent are upper-income. There are no low-income, underserved, or distressed CTs in this AA.

Owner-occupied housing units in the AA total 11,930. The majority of the housing units are in middle-income geographies, but 16.2 percent are in moderate-income CTs. The percentage of families below the poverty level in this AA is 11.8 percent, and the median family income is \$61,785.

Based on Peer Mortgage Data for the Milam and Lee AA, Citizens has a market share of 1.6 percent for total loans and 2.3 percent of the total dollar amount of loans and ranks 16th out of 194 lenders. Based

<sup>&</sup>lt;sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

on the Peer Small Business Data, Citizens does not have a significant market share in this AA. Based on the FDIC Summary of Deposits, as of June 30, 2023, the bank's deposit market share is 21.8 percent of the total market, ranking second out of six institutions. Deposits in this AA represent 50.1 percent of the bank's total deposits.

The community contact in the Milam and Lee AA is a director of an organization in Milam County that offers free business consulting and affordable training seminars to small and medium sized business owners. This organization helps small businesses to prepare the necessary documentation to apply for the Small Business Administration loan program. Their training focuses on business basics and general start-up questions as well as management, marketing, financial, and operational business issues. According to this contact, small business lending and real estate loans appear to be the driving force for lending in this AA.

The second community contact is a director of a non-profit organization that assists low-income individuals in becoming independent and self-sufficient and to help improve their quality of life by transitioning them out of poverty through innovative programs and strong community. The programs this organization provides are made possible through donations and community partnerships. Some of the programs this organization offers are Tenant Based Rental Assistance, Meals on Wheels Rural Capital Area Senior Nutrition Program, Energy Assistance Program, and Lee County GED program. According to this contact, there is a need to provide volunteer hours in financial literacy programs and donations to support these programs. The contact indicated there is a need for affordable housing. The contact also stated there is a lack of single-family units, and prices have increased significantly in recent years.

#### Williamson and Travis AA

The bank has five branches in the Williamson and Travis AA. The AA is comprised of Williamson and Travis Counties. The Williamson and Travis AA belongs to the Austin-Round Rock-Georgetown, TX MSA. The AA contains 425 census tracts, of which 6.4 percent are low-income, 23.5 percent are moderate-income, 33.4 percent are middle-income, 32.9 percent are upper-income, and 3.8 percent are unknown. The AA does not have any underserved or distressed CTs.

Owner-occupied housing units in the AA total 388,695. The majority of the housing units are in middle-and upper-income geographies, while 2.6 percent of the units are in low-income CTs and 17.6 percent are in moderate-income CTs. The percentage of families below the poverty level in this AA is 6.4 percent, and the median family income in the Austin-Round Rock-Georgetown, TX MSA is \$100,215.

Based on Peer Mortgage Data for the Williamson and Travis AA, Citizens has a market share of .02 percent of loans by number and .03 percent of the total dollar amount of loans. Citizens ranks 313 out of 839 lenders. Based on the Peer Small Business Data, the bank does not have a significant market share in this AA. The bank's deposit market share is .44 percent of the total market, ranking 27 out of 65 institutions. Deposits in this AA represent 49.1 percent of the bank's total deposits.

According to Moody's Analytics, the Austin-Round Rock Texas metro division's cost of living is relatively high and affordability is low. High tech adds to volatility of the Austin-Round Rock economy while chip-plant construction boosts the economy, more than expected. The unemployment rate has been flat at 3.3 percent and the labor force has continued to rise despite the slower hiring. Homebuilding has shown a decline. Significant rise in house prices, followed by a surge in mortgage rates resulted in a sharp drop in affordability. The reduced growth in employment has been another negative factor. Population growth averages more than two percent per year compared with less than

the .5 percent nationally. This strong population growth supports demographically driven consumer demand.

### Milam and Lee AA

Table A – Dem	ographic I	nformation	of the Assessn	nent Area		
Asses	sment Area	: Milam an	d Lee AA 2023	3		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	18.2	72.7	9.1	0.0
Population by Geography	42,232	0.0	19.7	73.2	7.2	0.0
Housing Units by Geography	19,276	0.0	19.2	73.8	6.9	0.0
Owner-Occupied Units by Geography	11,930	0.0	16.2	75.9	7.9	0.0
Occupied Rental Units by Geography	3,697	0.0	26.7	66.0	7.3	0.0
Vacant Units by Geography	3,649	0.0	21.5	75.0	3.5	0.0
Businesses by Geography	4,283	0.0	23.2	69.6	7.2	0.0
Farms by Geography	327	0.0	22.0	68.2	9.8	0.0
Family Distribution by Income Level	11,004	20.2	18.6	20.3	40.9	0.0
Household Distribution by Income Level	15,627	23.9	15.8	17.0	43.3	0.0
Median Family Income Non-MSAs - TX		\$61,785	Median Housi	ng Value		\$136,071
			Median Gross	Rent		\$760
			Families Belo	w Poverty Le	vel	11.8%

Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0%

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

Table A – Den	nographic I	nformation	of the Assessn	nent Area		
Asses	sment Area	: Milam and	d Lee AA 2021	1		
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	9.1	54.5	36.4	0.0
Population by Geography	41,008	0.0	8.0	58.6	33.4	0.0
Housing Units by Geography	18,893	0.0	8.5	56.9	34.6	0.0
Owner-Occupied Units by Geography	10,620	0.0	7.0	55.2	37.9	0.0
Occupied Rental Units by Geography	4,722	0.0	10.9	61.5	27.6	0.0
Vacant Units by Geography	3,551	0.0	9.8	56.2	34.0	0.0
Businesses by Geography	2,960	0.0	10.1	59.2	30.7	0.0
Farms by Geography	247	0.0	6.1	57.5	36.4	0.0
Family Distribution by Income Level	10,303	18.5	16.5	19.1	45.9	0.0
Household Distribution by Income Level	15,342	24.8	14.9	14.9	45.4	0.0
Median Family Income Non-MSAs - TX	_	\$52,198	Median Housi	ng Value		\$95,081
			Median Gross	Rent		\$670
			Families Belo	w Poverty Le	vel	12.6%

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

### **Scope of Evaluation in Texas**

The Milam and Lee AA was selected for a full-scope review while the Williamson and Travis AA was selected for a limited-scope review. Based on the Deposit Market Share Report, as of June 30, 2023, the bank had 11 branches in these two AAs with total deposits of \$548.1 million. The Williamson and Travis AA had five offices with \$269.2 million in deposits or 49.1 percent. The Milam and Lee AA had six offices with \$278.9 million in deposits or 50.9 percent. Refer to the table in Appendix A for a list of all AAs under review.

### **Conclusions in Respect to Performance Tests in Texas**

### **Lending Test**

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

### Conclusions for Area Receiving a Full-Scope Review

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

### Distribution of Loans by Income Level of the Geography

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

<sup>(\*)</sup> The NA category consists of geographies that have not been assigned an income classification.

#### Milam and Lee AA

#### Home Mortgage Loans

The geographic distribution of mortgage loans in the AA is good. Refer to Table O in the State of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

In 2021, the bank's mortgage lending in moderate-income geographies exceeded the percentage of the owner-occupied housing units and the aggregate lending.

In 2022-2023, the bank's mortgage lending in moderate-income geographies was near the percentage of owner-occupied housing units and the aggregate lending. This AA does not have any low-income CTs and has two moderate-income CTs.

#### Small Loans to Businesses

The geographic distribution of small loans to businesses is good. Refer to Table Q in the State of Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

In 2021, the bank's small loans to businesses in moderate-income geographies was near the percentage of businesses located in moderate-income geographies and exceeded the aggregate lending.

In 2022-2023, the bank's small loans to businesses in moderate-income geographies exceeded the percentage of businesses located in moderate-income geographies and the aggregate lending. The Milam and Travis AA does not have low-income CTs.

#### Lending Gap Analysis

We evaluated the lending distribution in the bank's AAs to determine if any unexplained conspicuous gaps existed. There were no unexplained conspicuous gaps identified.

#### Distribution of Loans by Income Level of the Borrower

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

#### Milam and Lee AA

#### Home Mortgage Loans

The distribution of loans to low- and moderate-income individuals in the AA is adequate. Refer to Table P in the State of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In 2021, the bank's home mortgage lending to low-income borrowers was somewhat lower than the percentage of families identified as low-income and exceeded the aggregate lending. For moderate-

income borrowers, the bank's home mortgage lending was near the percentage of families identified as moderate-income and exceeded the aggregate lending.

In 2022-2023, the bank's home mortgage lending to low-income borrowers was somewhat lower than the percentage of families identified as low-income and exceeded the aggregate lending. For moderate-income borrowers, the bank's home mortgage lending was lower than the percentage of families identified as moderate-income and the aggregate lending.

During 2022 and 2023, borrowers faced affordability challenges in the AA as interest rates, housing prices, and insurance premiums increased during this time. The median family income in the AA is \$61,785 and the median housing value is \$136,071. Low-income borrowers earn no more than \$30,892 and moderate-income borrowers earn no more than \$47,428 annually. The calculated maximum affordable monthly mortgage payment for a low-income borrower is \$772 and \$1,187 for a moderate-income borrower. The average monthly principal and interest not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses for a \$136,000 house would be approximately \$730. Low-income borrowers would be challenged to afford a mortgage payment. In addition, the bank does not offer long-term fixed rate, high Loan to Value (LTV) mortgage products as some of the bank's peers offer.

#### Small Loans to Businesses

The distribution of small loans to businesses in the AA is good. Refer to Table R in the State of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

In 2021, the bank's loans to businesses with revenues less than or equal to \$1 million exceeded the percentage of businesses identified as having revenues less than or equal to \$1 million and the aggregate lending.

In 2022-2023, the bank's loans to businesses with revenues less than or equal to \$1 million was near the percentage of businesses identified as having revenues less than or equal to \$1 million and exceeded the aggregate lending.

#### **Responses to Complaints**

There were no complaints related to the bank's CRA performance within the State of Texas during the evaluation period.

### Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Williamson and Travis AA is consistent with the bank's overall performance under the Lending Test in the full scope area.

### **Community Development Test**

The bank's performance under the Community Development Test in the state of Texas is rated Satisfactory.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review and limited-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

#### **Number and Amount of Community Development Loans**

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

	Community D	evelopment Loan	s	
A		To	tal	
Assessment Area	#	% of Total #	\$(000's)	% of Total \$
Full-Scope Review				
Milam and Lee AA	10	36	115	2
Limited-Scope Review				
Williamson and Travis AA	7	25	1,711	24
Broader Statewide	11	39	5,190	74
Total	28	100	7,016	100

#### Milam and Lee AA

Citizens originated 10 CD loans totaling \$115,000 in the AA. The loans promoted community services targeted to low and moderate-Income individuals and activities that promote economic development in the AA. Examples of the loans included the following:

- A \$66,000 loan to finance a facility that serves LMI residents of a low-income neighborhood.
- A \$20,000 loan that helped a CRA-eligible farm purchase of farm equipment.
- An \$8,000 loan that helped an LMI individual purchase a car.

#### **Broader Statewide Area**

Citizens originated 11 CD loans totaling \$5.2 million outside of its AAs but within the State of Texas. The loans met a variety of needs with most centered on providing affordable housing. Examples include the following:

- A \$3.3 million loan that provided funding for construction of a commercial building intended for retail use in an opportunity zone and a moderate-income CT in Bell County. Going forward, this county will be part of the bank's AAs.
- A \$600,000 loan that provided funding for a business that purchased affordable housing in a moderate-income CT.
- A \$110,000 loan to a small business to purchase inventory located in a moderate-income CT in Bell County.

In response to the Coronavirus Aid, Relief, and Economic Security Act, or CARES Act, established in 2020, Citizens participated in the Small Business Administrations' Paycheck Protection Program (PPP). The bank originated 275 PPP loans totaling \$15.1 million in 2021.

#### **Number and Amount of Qualified Investments**

				Qualifi	ed In	vestmen	nts				
	Prior	Period*	_	urrent eriod			Total	Unfunded Commitments**			
Assessment Area	#	\$ (000's)	#	\$ (000's)	#	% of Total #	\$ (000's)	% of Total \$	#	\$ (00 0's)	
Full Scope	•	· I	ı	•			·!·			· · · · · · · · · · · · · · · · · · ·	
Milam and Lee AA	0	0	7	2,491	7	46.7	2,491	77.2	0	0	
Limited Scope			I								
Williamson and Travis AA	2	505	5	4	7	46.7	509	15.8	0	0	
	1	1	I	I			1		1		
Broader Statewide	1	225	0	0	1	6.6	225	7.0	0	0	
Total	3	730	12	2,495	15	100	3,225	100	0	0	
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<sup>\*</sup> Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

#### Milam and Lee AA

During the evaluation period, Citizens' investments included a bond totaling \$2.4 million and donations totaling approximately \$51,000 that provided services to LMI individuals or areas within the AA. This represents 7.5 percent of allocated capital as of December 31, 2023. The purpose of the bond is to provide funds to finance the costs of renovation and repairs to existing Milam County facilities. Examples of the donations include:

- One donation to the Cameron ISD to help fund the district's scholarship program; 75 percent of students in this school district are economically-disadvantaged.
- Two donations totaling \$50,000 to the Texas FFA Foundation Area 12 to provide scholarships to LMI students.
- One donation to the Cameron Lions Club for an eyeglass program for economically-disadvantaged youth.

<sup>\*\*</sup> Unfunded Commitments' means legally binding investment commitments tracked and recorded by the institution's financial reporting system.

#### **Broader Statewide**

The bank has a prior period \$225,000 investment in Bedford Texas bond for the city's water-related work.

#### **Extent to Which the Bank Provides Community Development Services**

#### Milam and Lee AA

During the evaluation period, bank officers and staff provided 314 community service hours to 12 organizations that provide CD services in this AA. Eligible activities included providing leadership and technical expertise through board and committee membership and providing financial education to LMI individuals. The qualifying organizations focus on providing essential services to LMI individuals and families. Examples of CD services in the AA include:

- The Cameron Lions Club has an eyeglasses program that helps to provide eye exams and eyeglasses for qualified applicants. One bank employee served as a board member responsible for reviewing applicants for eligibility and for ensuring the Club budgeted enough funds to maintain the program. Another employee of the bank was part of the committee that selected scholarship awards to LMI students.
- Two employees of the bank delivered a finance class to a local high school. Most students attending this high school are economically-disadvantaged.
- Several employees of the bank participated in a community event in which they distributed financial literacy materials to LMI youth and children.

### Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, Citizens' performance under the CD Test in the Williamson and Travis AA is consistent with the bank's overall performance under the CD Test in the full scope AA. During the evaluation period Citizens originated seven CD loans totaling \$1.7 million in the AA. Citizens had seven CD investments totaling \$509,000 and 28 community service hours to three organizations that provide CD services in the AA. Performance in the limited-scope AA had a limited impact on the overall CD rating.

### **Appendix A: Scope of Examination**

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

Time Period Reviewed:	January 1, 2021 – Decemb	er 31, 2023					
Bank Products Reviewed:	Home mortgage, small bus investments, community do	iness, community development loans, qualified evelopment services.					
Affiliate(s)	Affiliate Relationship	Products Reviewed					
None							
List of Assessment Areas and Typ	e of Examination						
Rating and Assessment Areas	Type of Exam	Other Information					
State of Texas							
Williamson and Travis AA	Limited-scope	Entire counties of Williamson and Travis					
Milam and Lee AA	Full-scope Entire counties of Milam and Lee						

## **Appendix B: Summary of MMSA and State Ratings**

	RATINGS Citi	zens National Bank	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
Citizens National Bank	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
Texas	Satisfactory	Satisfactory	Satisfactory

<sup>(\*)</sup> The Lending Test and Community Development Test carry equal weight in the overall rating.

### **Appendix C: Definitions and Common Abbreviations**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **Appendix D: Tables of Performance Data**

#### **Content of Standardized Tables**

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

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2021

	Tot	al Home l	Mortgag	ge Loans	Low-I	<b>Low-Income Tracts</b>			Moderate-Income Tracts			Middle-Income Tracts			Income	e Tracts	Not Available-Income Tracts			
Assessment Area:	#	\$ \$(000s)	% of Total	Overall Market	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		00 0	% of Owner- Occupied Housing Units		00 0	% of Owner- Occupied Housing Units		00 0	% of Owner- Occupied Housing Units		Aggregate	
Milam and Lee AA	20	3,559	100.0	1,039	0.0	0.0	0.0	7.0	10.0	4.3	55.2	70.0	55.3	37.9	20.0	40.3	0.0	0.0	0.0	
Williamson and Travis AA	20	14,608	100.0	134,316	4.4	15.0	4.0	15.0	25.0	11.4	37.8	40.0	41.9	42.6	20.0	42.5	0.2	0.0	0.2	
Total	40	18,167	100.0	135,355	4.2	7.5	4.0	14.8	17.5	11.3	38.3	55.0	42.0	42.4	20.0	42.4	0.2	0.0	0.2	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%

#### Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2022-23

	Т	otal Home	Mortgage	Loans	Low-l	ncome	Tracts	Moderate-Income Tracts			Middle-Income Tracts			Upper-	Income	Tracts	Not Available-Income Tracts			
Assessment Area:	#	\$ \$(000s)	% of Total	Overall Market	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate	
Milam and Lee AA	25	7,375	53.2	834	0.0	0.0	0.0	16.2	16.0	18.9	75.9	80.0	71.7	7.9	4.0	9.4	0.0	0.0	0.0	
Williamson and Travis AA	22	15,913	46.8	75,080	2.6	0.0	1.9	17.6	27.3	17.3	37.6	45.5	41.4	41.8	27.3	38.7	0.5	0.0	0.7	
Total	47	23,288	100.0	75,914	2.5	0.0	1.9	17.5	21.3	17.4	38.7	63.8	41.7	40.8	14.9	38.4	0.5	0.0	0.7	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2021

	To	otal Home	Mortga	ige Loans	Low-In	come B	orrowers		Moderate-Income Borrowers			Middle-Income Borrowers			ncome ]	Borrowers	Not Available-Income Borrowers			
Assessment Area:	#	\$ \$(000s)	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Milam and Lee AA	20	3,559	100.0	1,039	18.5	10.0	1.6	16.5	15.0	9.7	19.1	10.0	18.6	45.9	65.0	49.0	0.0	0.0	21.1	
Williamson and Travis AA	20	14,608	100.0	134,316	22.1	10.0	3.0	16.3	0.0	12.0	19.6	5.0	18.1	42.0	85.0	47.0	0.0	0.0	19.9	
Total	40	18,167	100.0	135,355	22.0	10.0	3.0	16.3	7.5	12.0	19.6	7.5	18.1	42.1	75.0	47.0	0.0	0.0	19.9	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%

#### Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2022-23

	To	tal Home	Mortgaş	ge Loans	Low-In	come B	orrowers		Moderate-Income Borrowers		Middle-Income Borrowers			Upper-I	ncome ]	Borrowers	Not Available-Income Borrowers			
Assessment Area:	#	\$ \$(000s)		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Milam and Lee AA	25	7,375	53.2	834	20.2	16.0	3.7	18.6	4.0	11.0	20.3	4.0	19.3	40.9	60.0	49.8	0.0	16.0	16.2	
Williamson and Travis AA	22	15,913	46.8	75,080	20.4	4.5	3.6	16.8	4.5	11.8	20.8	9.1	19.4	42.0	40.9	48.0	0.0	40.9	17.2	
Total	47	23,288	100.0	75,914	20.4	10.6	3.6	16.9	4.3	11.8	20.8	6.4	19.4	42.0	51.1	48.0	0.0	27.7	17.2	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA Aggregate Data.

Due to rounding, totals may not equal 100.0%

#### Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2021

	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	\$ \$(000s)		Overall Market	Rusinossos	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Milam and Lee AA	20	940	100.0	694	0.0	0.0	0.0	10.1	10.0	6.1	59.2	55.0	59.9	30.7	35.0	34.0	0.0	0.0	0.0
Williamson and Travis AA	20	1,788	100.0	64,948	6.4	0.0	7.2	11.2	25.0	12.8	32.2	55.0	33.6	48.8	20.0	45.5	1.3	0.0	0.9
Total	40	2,728	100.0	65,642	6.3	0.0	7.1	11.2	17.5	12.7	32.5	55.0	33.8	48.6	27.5	45.4	1.3	0.0	0.9

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0%

#### Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography

2022-23

	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	\$ \$(000s)		Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Milam and Lee AA	20	1,608	100.0	772	0.0	0.0	0.0	23.2	40.0	19.4	69.6	60.0	71.5	7.2	0.0	9.1	0.0	0.0	0.0
Williamson and Travis AA	20	6,806	100.0	68,120	2.8	10.0	3.5	13.5	50.0	18.1	30.8	30.0	30.9	47.3	10.0	45.2	5.6	0.0	2.1
Total	40	8,414	100.0	68,892	2.8	5.0	3.5	13.6	45.0	18.2	31.2	45.0	31.4	46.9	5.0	44.8	5.5	0.0	2.1

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0%

#### Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2021

	Т	otal Loans to	Small Busines	ses	Businesses	with Revenue	s <= 1MM	Businesses wi		Businesses with Revenues Not Available		
Assessment Area:	#	\$ \$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Milam and Lee AA	20	940	100.0	694	84.9	95.0	39.3	3.8	5.0	11.4	0.0	
Williamson and Travis AA	20	1,788	100.0	64,948	89.5	100.0	45.2	3.0	0.0	7.5	0.0	
Total	40	2,728	100.0	65,642	89.4	97.5	45.1	3.0	2.5	7.5	0.0	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.

Due to rounding, totals may not equal 100.0%

#### Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues

2022-23

	To	otal Loans to	Small Busines	ses	Businesses	with Revenue	s <= 1MM	Businesses wi		Businesses with Revenues Not Available		
Assessment Area:	#	\$ \$(000s)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Milam and Lee AA	20	1,608	100.0	772	88.9	75.0	47.3	2.7	25.0	8.3	0.0	
Williamson and Travis AA	20	6,806	100.0	68,120	94.1	80.0	48.8	1.6	20.0	4.3	0.0	
Total	40	8,414	100.0	68,892	94.1	77.5	48.8	1.6	22.5	4.3	0.0	

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data

Due to rounding, totals may not equal 100.0%