



PUBLIC DISCLOSURE

September 24, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Santa Anna National Bank
Charter Number 13854

610 Wallis Ave
Santa Anna, TX 76878

Office of the Comptroller of the Currency

225 E. John Carpenter Fwy, Suite 900
Irving, TX 75062-2270

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

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Overall CRA Rating

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

The lending test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on performance in the bank's one assessment area (AA).
- The loan-to-deposit (LTD) ratio is more than reasonable.
- A majority of the bank's loans are inside its AA.
- The geographic distribution of loans is reasonable.
- The distribution of loans to businesses of different sizes and individuals of different income levels is excellent.
- Community Development (CD) activities including lending, investments, services, and donations reflect excellent responsiveness to CD needs within the AA.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is more than reasonable. The LTD ratio is calculated on a bank-wide basis. The bank's quarterly LTD ratio during the evaluation period averaged 64.9 percent and reflects an increase from the average ratio of 63.3 percent at the last CRA performance evaluation. During the evaluation period, the bank's LTD ratio ranged from a low of 54.8 percent to a high of 75.3 percent. We compared the bank's LTD ratio to nine similarly situated institutions. The aggregate average LTD ratio for the other institutions was 49.4 percent, with a low average of 11.6 percent and a high average of 81.3 percent. Three of the institutions are located in the local market with a much higher asset size ranging from \$197 million to \$2.2 billion. The remaining six institutions have similar asset sizes ranging from \$56 million to \$91 million, and are in similar, rural communities within 150 miles of the bank. It is noted that considering the six institutions with similar asset size, the aggregate average LTD ratio was 41.5 percent with a low average of 11.6 percent and a high average of 75 percent.

Lending in Assessment Area

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

The bank originated and purchased 76.7 percent of its total loans inside the its AA during the evaluation period. Our analysis relied on a sample of 121 loans consisting of small business and consumer loans. This analysis is performed at the bank level rather than the AA. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	45	71.4	18	28.6	63	5,324	66.5	2,682	33.5	8,005
Consumer	48	82.8	10	17.2	58	1,703	80.6	411	19.4	2,113
Total	93	76.9	28	23.1	121	7,027	69.4	3,093	30.6	10,118

Source: Bank Data
Due to rounding, totals may not equal 100.0%
Dollar amounts for Small Business, Small Farm and Consumer loans are multiplied by 1000.

Description of Institution

The Santa Anna National Bank (SANB) is headquartered in Santa Anna, Coleman County, Texas. SANB is a \$58 million single-state institution and is not a subsidiary of a bank or financial holding company. The bank is owned 66 percent by one individual and is a woman-owned institution. There are no other subsidiaries or affiliates and there was no merger or acquisition activity during the evaluation period.

SANB has one main office that operates in Santa Anna, Texas. It is the only bank with a physical location in the town. The bank's sole AA is comprised of all census tracts (CT in Coleman and Brown counties. Please refer to the "Description of Institution's Operations in Texas for additional information on the bank's AA.

As of December 31, 2023, SANB had total assets of \$59 million, with net loans representing 64 percent of total assets, core deposits representing 75 percent of total assets, and Tier one capital of \$6 million. Loan products are traditional including financing for small businesses, small farms, and personal loans. The loan portfolio by dollar volume is comprised of 37 percent commercial loans, 15 percent real estate loans, 26 percent agriculture loans, and 22 percent consumer loans. However, loans originated during the review period by dollar volume is comprised of 44 percent commercial loans, 31 percent agriculture loans and 25 percent consumer loans. Although consumer loans reflect a low volume of total loans by dollar, consumer loans represent most of the loans made at 56 percent of total loans. The SANB strategy focuses on serving customers in the rural areas of the AA. Loan amounts tend to be small dollar due to the bank's size and strategy of focusing on rural areas. This is particularly true of small business loans and consumer loans for personal expenses.

There are no legal, financial, or other factors impeding SANB's ability to help meet the credit needs in the AA. SANB received an overall rating of "Outstanding" at the last CRA evaluation dated August 5, 2019.

Scope of the Evaluation

Evaluation Period/Products Evaluated

SANB was evaluated under the Small Bank CRA evaluation procedures, which includes a Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of the AA through its lending activities. Our review included the bank's performance from January 1, 2021 through December 31,

2023. To evaluate the bank's lending performance, we analyzed a sample of 45 commercial loans and 48 consumer loans originated inside the AA during the evaluation period.

At the bank's option, SANB provided CD activities from January 1, 2021 through December 31, 2023, reflecting the bank's record of qualified lending, investments and services. We assessed the performance of these CD activities and its effect on the bank's rating in its AA.

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.

SANB has delineated one AA that includes all of Coleman County and Brown County, Texas, which consists of 17 CTs. The bank has properly defined its AA in accordance with the technical requirements of the CRA regulation. The AA consists of whole CTs, does not arbitrarily exclude LMI CTs, and includes CTs where the majority of its loans are originated and where the bank is located. The AA does not reflect illegal discrimination. The AA is not an MSA or an MMSA and is not a combination of more than one non-MSA AA.

Ratings

The bank's overall rating is based solely on performance in the State of Texas.

The state rating is based on performance in the bank's AA. Refer to the "Scope" section under the state Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Texas

CRA rating for the State of Texas¹: Outstanding

The Lending Test is rated: Outstanding

The major factors that support this rating include:

- The bank's LTD ratio is more than reasonable, reflecting strong responsiveness to credit needs in the AA.
- A substantial majority of the bank's loans, 76.9 percent by number and 69.4 percent by dollar, were made inside the AA.
- The distribution of loans is excellent among individuals of different income levels and businesses of different sizes given the bank's AA and performance context.
- The distribution of loans is reasonable among individuals and small businesses of different income levels of the geography given the bank's AA and performance context.
- CD activities demonstrates excellent responsiveness during the evaluation period to CD needs within the AA, and had a positive effect on the bank's overall rating.

Description of Institution's Operations in Texas

SANB is an intrastate bank that provides banking services to the public through its main office that offers full-service banking with drive-thru service located in the AA. The bank has only one AA. The AA consists of all CTs in Coleman and Brown Counties. Coleman and Brown Counties are not located in an MSA or MMSA. Prior to the results of the 2020 census, the bank's AA included two CTs classified as distressed middle-income CTs based on poverty rates. In 2021, there was a total of 16 CTs in the AA. The AA did not have any CTs classified as distressed middle-income. Brown County had two low-income and two moderate-income CTs. Coleman county had two moderate-income CTs. The bank was situated in a moderate-income CT. The 2020 census resulted in changes to the AA CTs. In 2022, there was a total of 17 CTs in the AA. Brown County had one low-income CT and one moderate-income CT. Coleman County did not have any low or moderate income CTs. The CT income level the bank was situated in changed to a middle-income CT. Although the bank included all of Brown County in its AA, there are larger institutions that dominate this market including the institutions located in the city of Brownwood. It would not be reasonable to expect the bank with only one location in a rural area approximately 20 miles from the city of Brownwood to serve all of Brown County given the level of competition from the larger institutions.

The bank encounters competition from community banks, credit unions, and agricultural lenders in the AA. According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report as of June 30, 2024, there are nine financial institutions operating in the AA, with SANB holding four percent of the deposit market share. SANB is ranked seven with \$48.5 million in deposits. Other banks with notable market share include Texas Bank (41 percent), Citizens National Bank at Brownwood (20

¹ This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

percent), and Coleman County State Bank (8.4 percent). There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the assessment period.

We conducted interviews with two community contacts and reviewed a prior interview with a community contact within the AA to obtain a community profile and identify opportunities for community development. Primary credit needs in the AA are for small business, personal, and housing loans, particularly to lower income borrowers. While median home prices in the AA are lower than national averages, the AA has a higher number of elders and lower-income families. Employment opportunities are limited and most residents commute outside the county. The area historically has struggled with attracting and retaining small businesses due to high competition from nearby towns and business owners with limited financial literacy. Opportunities for participation by local financial institutions include providing financial literacy courses to the public. Public perception of financial institutions in the area is positive.

Santa Anna – Non MSA AA (2021)

Table A – Demographic Information of the Assessment Area						
Assessment Area: Santa Anna - Non MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	15	13.3	26.7	53.3	6.7	0.0
Population by Geography	46,369	8.9	27.0	57.0	7.1	0.0
Housing Units by Geography	23,945	6.8	28.3	59.6	5.3	0.0
Owner-Occupied Units by Geography	11,724	5.0	24.5	62.5	8.0	0.0
Occupied Rental Units by Geography	4,976	15.8	34.5	47.3	2.4	0.0
Vacant Units by Geography	7,245	3.7	30.1	63.2	3.0	0.0
Businesses by Geography	3,120	18.9	26.0	48.7	6.4	0.0
Farms by Geography	222	6.8	32.9	52.3	8.1	0.0
Family Distribution by Income Level	11,661	22.2	19.3	21.7	36.8	0.0
Household Distribution by Income Level	16,700	24.9	17.8	18.7	38.6	0.0
Median Family Income Non-MSAs - TX		\$52,198	Median Housing Value			\$82,083
			Median Gross Rent			\$648
			Families Below Poverty Level			14.1%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Santa Anna – Non MSA AA (2022 – 2023)

Table A – Demographic Information of the Assessment Area						
Assessment Area: Santa Anna - Non MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	6.3	6.3	56.3	25.0	6.3
Population by Geography	45,779	5.6	5.4	61.7	24.5	2.8
Housing Units by Geography	24,659	4.7	5.3	61.8	26.4	1.9
Owner-Occupied Units by Geography	13,072	3.1	5.0	61.1	29.6	1.3
Occupied Rental Units by Geography	5,034	11.8	9.2	63.1	13.6	2.3
Vacant Units by Geography	6,553	2.6	2.7	62.0	29.9	2.8
Businesses by Geography	4,189	5.0	4.8	53.5	25.3	11.4
Farms by Geography	295	1.7	1.0	60.7	33.2	3.4
Family Distribution by Income Level	11,802	20.3	17.0	22.6	40.1	0.0
Household Distribution by Income Level	18,106	24.3	17.1	19.2	39.4	0.0
Median Family Income Non-MSAs - TX		\$61,785	Median Housing Value			\$109,370
			Median Gross Rent			\$746
			Families Below Poverty Level			9.8%
<i>Source: 2020 U.S. Census and 2023 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Texas

A full-scope review was performed on the bank's AA for the evaluation period covering January 1, 2021 to December 31, 2023.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Santa Anna – Non MSA AA is excellent.

Primary weight for this conclusion is based on the distribution of loans by business size and income category of the borrower. Less weight is given to the distribution of loans by income level of geography because of the distance of the low- and moderate-income (LMI) tracts in the AA from the Bank's location and the proximity of competing institutions within those tracts.

Distribution of Loans by Income Level of the Geography

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

Small Loans to Businesses

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

In 2021, The bank originated a total of 25 small business loans during this period, however only 17 were in the AA and eight were outside the AA. The bank did not originate any small business loans located in low-income geography. The percentage of small business loans located in moderate-income geographies exceeds the percentage of businesses and the aggregate lending data in these geographies.

In 2022 and 2023, the bank did not originate any small business loans located in low-income geography. Also, the percentage of small business loans located in moderate-income geographies is somewhat lower than the percentage of businesses and the aggregate lending data in these geographies.

LMI census tracts within the AA are located in downtown Brownwood and adjoining portions of the city of Brownwood. The LMI geographies are approximately 20 miles from the Bank's single location, the rural area of Santa Anna, TX. SANB has less than a one percent of the deposit market share in Brown County. In addition, the LMI geographies contain many long-standing businesses that do not require on-going financing. This presents a potential challenge for fully penetrating the business demographic within LMI geographies. The community contact indicated that new opportunities for participation by local financial institutions are limited, as businesses in the area are larger and have established funding sources.

Consumer Loans

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

In 2021, the bank did not originate any consumer loans to borrowers located in low-income geographies. Conversely, the bank's lending performance within moderate-income census tracts exceeds the percentage of households located in moderate-income geographies.

In 2022 and 2023, the bank did not originate any consumer loans to borrowers located in LMI geographies.

LMI census tracts within the AA are located in downtown Brownwood and adjoining portions of the city of Brownwood. The LMI geographies are approximately 20 miles from the Bank's single location, the rural area of Santa Anna, TX. The larger financial institutions dominate this market primarily the financial institutions located in the city of Brownwood. This presents a potential challenge for fully penetrating the consumer demographic within LMI geographies.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Businesses

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

In 2021, the percentage of loans to businesses with annual revenues of \$1 million or less exceeded the reported percentage of businesses and the aggregate lender performance in the AA.

In 2022 and 2023, the percentage loans to businesses with annual revenues of \$1 million or less was lower than the reported percentage of small businesses in the AA and exceeded the aggregate lender performance in the AA.

Consumer Loans

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

In 2021, the percentage of consumer loans to low-income individuals was lower than the percentage of low-income households in the AA. The bank's AA has a 14.1 percent poverty rate, which impacts the bank's ability to fully penetrate the low-income borrower demographic. The bank's consumer lending to moderate-income individuals exceeded the percentage of moderate-income households in the AA.

In 2022 and 2023, the percentage of consumer loans to low-income individuals was lower than the percentage of low-income households in the AA. The bank's AA has a 9.8 percent poverty rate, which impacts the bank's ability to fully penetrate the low-income borrower demographic. The bank's consumer lending to moderate-income individuals exceeded the percentage of moderate-income households in the AA.

Number and Amount of Community Development Loans

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

<i>Community Development Loans 2021-2023</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Santa Anna AA	25	100	1,971	100

The level of CD lending in the Santa Anna AA demonstrates excellent responsiveness. SANB made 100 percent of its CD loans in the AA which represents 33 percent of the bank's allocated tier 1 capital. The

bank originated four loans totaling \$1.9 million in economic development loans to support small businesses and 21 loans totaling \$8 thousand to LMI youth to teach financial literacy and responsibility.

Responses to Complaints

SANB and the OCC did not receive any complaints regarding CRA over the evaluation period.

COMMUNITY DEVELOPMENT

Based on a full-scope review, the bank exhibits excellent 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 assessment area. Performance related to community development activities had a positive effect on the bank's rating in the state.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Santa Anna AA			3	2	3	3	2	100	0	0

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

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

SANB demonstrated adequate responsiveness to CD needs through qualified investments and donations relative to the size and scale of bank operations in the AA. During the evaluation period, the bank made \$1,500 in qualifying donations to the local ACE program that provides before and after school programs for LMI youths.

Extent to Which the Bank Provides Community Development Services

The bank's level of CD service demonstrates excellent responsiveness to the needs of the AA. During the evaluation period, bank employees and directors provided 396 hours of volunteer time to four qualified organizations. These organizations are engaged in a variety of community services targeted to LMI individuals and families and economic development.

Examples of CD services during the evaluation period include:

- Two bank employees completed 144 hours providing financial expertise for an organization that provides community service to LMI individuals.
- Two bank employees completed 54 hours teaching financial literacy classes to LMI youths.
- Director provided 144 hours to local non-profit entity that provides grants for economic development projects.

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

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

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2021 to 12/31/2023	
Bank Products Reviewed:	Small business and consumer loans At the bank’s option - Community development loans, qualified investments, community development services	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Texas		
Santa Anna Non-MSA AA	Full Scope	Non-MSA Counties of Coleman and Brown in Texas

Appendix B: Summary of MMSA and State Ratings

RATINGS	Santa Anna National Bank
Overall Bank:	Lending Test Rating
Santa Anna National Bank	Outstanding
State:	
Texas	Outstanding

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Santa Anna - Non MSA	17	1,401	100	820	18.9	0.0	7.6	26.0	88.2	47.9	48.7	5.9	39.9	6.4	5.9	4.6	0.0	0.0	0.0	
Total	17	1,401	100	820	18.9	0.0	7.6	26.0	88.2	47.9	48.7	5.9	39.9	6.4	5.9	4.6	0.0	0.0	0.0	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022-23
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Santa Anna - Non MSA	28	3,923	100	800	5.0	0.0	1.4	4.8	3.6	4.9	53.5	82.1	61.3	25.3	7.1	21.3	11.4	7.1	11.3	
Total	28	3,923	100	800	5.0	0.0	1.4	4.8	3.6	4.9	53.5	82.1	61.3	25.3	7.1	21.3	11.4	7.1	11.3	

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Santa Anna - Non MSA	17	1,033	100	820	80.5	88.24	59.9	4.4	11.76	15.1	0.00
Total	17	1,033	100	820	80.5	88.24	59.9	4.4	11.76	15.1	0.00
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-23
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Santa Anna - Non MSA	28	3,923	100	800	85.3	71.4	58.4	3.0	21.4	11.7	7.1
Total	28	3,923	100	800	85.3	71.4	58.4	3.0	21.4	11.7	7.1
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Santa Anna - Non MSA	22	534	100	8.2	0.00	27.4	72.73	58.0	27.27	6.4	0.00	0.0	0.00	
<i>Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%</i>														

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022-23	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Santa Anna - Non MSA	26	1,166	100	5.5	0.00	6.2	0.00	61.7	73.08	25.1	26.92	1.6	0.00	
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data. Due to rounding, totals may not equal 100.0%</i>														

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Santa Anna - Non MSA	22	537	100	24.9	4.6	17.8	18.2	18.7	31.8	38.6	45.5	0.0	0.00	
Total	22	537	100	24.9	4.6	17.8	18.2	18.7	31.8	38.6	45.5	0.0	0.00	

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022-23	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Santa Anna - Non MSA	20	1,166	100	24.3	7.7	17.1	23.1	19.2	30.8	39.4	38.5	0.0	0.0	
Total	20	1,166	100	24.3	7.7	17.1	23.1	19.2	30.8	39.4	38.5	0.0	0.0	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data.
Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.