



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

April 1, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The City National Bank of Sulphur Springs
Charter Number 3989

201 Connally Street
Sulphur Springs, Texas 75482

Office of the Comptroller of the Currency

1800 West Loop 281
Longview, Texas 75604

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 Community Reinvestment Act (CRA) Rating

The 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 a reasonable distribution of loans in low- and moderate-income (LMI) geographies, a reasonable distribution of lending to LMI borrowers, a majority of loans are in the institution's assessment area (AA), and a reasonable loan-to-deposit (LTD) ratio when compared to peer financial institutions.
- The community development test rating is based on adequate responsiveness to community development needs in the AA through community development lending, qualified investments, and community development services.

Loan-to-Deposit Ratio

Considering the institution's size, financial condition, and credit needs of the AAs, the LTD ratio is reasonable. The LTD ratio is calculated on an institution-wide basis. The average quarterly LTD ratio for the institution during the evaluation period was 67.9 percent. The quarterly average LTD ratio for similarly situated financial institutions was 75.7 percent with a high average of 105.8 percent and a low average of 40.0 percent.

Lending in Assessment Area

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

The institution originated and purchased 72.0 percent of total loans inside the AAs during the evaluation period. This analysis is performed at the institution, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. This conclusion is based on the entire population of the institution's primary products during the evaluation. The findings from the analysis factored into the overall analysis of the geographic distribution of lending by income of the geography.

Table D: Lending Inside and Outside of the Assessment Area

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,243	71.8	487	28.2	1,730	260,215	63.0	153,123	37.0	413,338
Consumer	17	85.0	3	15.0	20	287	81.5	65	18.6	352
Total	1,260	72.0	490	28.0	1,750	260,502	63.0	153,188	37.0	413.690

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 City National Bank of Sulphur Springs (CNB or institution) is a single-state federally chartered institution headquartered in Sulphur Springs, Texas. CNB is wholly owned by Sulphur Springs Bancshares, Inc., a one-bank holding company.

CNB currently operates from 18 full-service branch locations including a mortgage production office as well as automated teller machines (ATMs) expanded throughout 10 counties in the state of Texas. CNB has one branch located within the Longview metropolitan statistical area (MSA), which includes Gregg and Upshur Counties. The remaining branches are located within the non-MSA AA which includes Camp, Hopkins, Rains, Wood, Cass, Franklin, Morris, and Van Zandt Counties. There have been no other major changes to CNB's corporate structure or operations. Refer to the section titled "Description of Operations in Texas" for details regarding the institutions two AAs.

CNB's lending focuses primarily on residential real estate/home mortgage loans as well as consumer loans. The institution also originates farmland and commercial loans; however, these loans represent a minimal portion of the portfolio and are not a focus.

As of December 31, 2023, CNB reported total assets of \$1.2 billion and tier 1 capital of \$115.9 million. Total loans outstanding were \$862.7 million, representing 70.0 percent of total assets.

There are no legal, financial, or other factors impeding the institution's ability to meet the credit needs of the AA. The institution's CRA performance was previously evaluated as of April 26, 2021, with an overall level of performance of "Satisfactory" under the Intermediate Small Bank examination procedures.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The Office of the Comptroller of the Currency (OCC) evaluated the CRA performance of CNB using the intermediate-small bank performance criteria. The evaluation period for the lending test is January 1, 2021, through December 31, 2023. For the lending test, the OCC analyzed home mortgage loans and consumer loans. Due to limited Home Mortgage Disclosure Act (HMDA) loans in the Longview MSA AA, a meaningful analysis could not be performed.

Beginning in March 2020, the U.S. faced a pandemic from the coronavirus disease of 2019 (COVID-19) that resulted in economic uncertainties, including business shutdowns and increased unemployment. The federal government instituted several programs and initiatives to assist businesses and individuals, including the Payroll Protection Program, mortgage foreclosure and eviction protection programs, and extended unemployment benefits. OCC examiners considered the institution's participation in addressing community and customer needs during the COVID-19 pandemic for all AAs in lending and community development tests of this evaluation.

Selection of Areas for Full-Scope Review

In each state where the institution has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, institution-delineated AAs located within the same MSA, multi-state MSA, or combined statistical area are combined and evaluated as a single AA. Similarly, institution delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each state rating for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The institution's overall rating is a blend of the state ratings, and where applicable, multi-state ratings. The non-MSA AA was weighted more heavily with a majority of the institution's branches and deposits located in the AA. Little weight will be given to the Longview MSA AA.

The multi-state MSA rating and state ratings are based on performance in all institution-delineated AAs. Refer to the "Scope" section under each state and multi-state MSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

New census data was released midway through the evaluation period. The OCC conducted two analyses as a result. Performance during 2021 was compared to data from the 2010 census and 2015 American Community Survey, while performance during 2022 and 2023 was compared to data from the 2022 census.

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, financial institution) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the financial institution, or in any AA by an affiliate whose loans have been considered as part of the financial institution'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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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: Satisfactory

The lending test is rated: Satisfactory

The community development test is rated: Satisfactory

The major factors that support this rating include:

- The institution exhibits a reasonable geographic distribution of loans to LMI geographies.
- The institution exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- The institution exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services.

Description of Institution's Operations in Texas

The institution operates in two AAs in the state of Texas as mentioned in the "Description of the Institution." The AAs are comprised of the non-MSA AA and the Longview MSA AA. The non-MSA AA is comprised of Camp, Hopkins, Rains, and Wood Counties in their entirety and portions of Cass, Franklin, Morris, and Van Zandt Counties. The Longview MSA AA is comprised of portions of Gregg and Upshur Counties.

While CNB's primary focus is residential real estate/home mortgage and consumer loans, the institution offers a variety of loan and deposit products to meet the needs of the community. The Federal Deposit Insurance Corporation (FDIC) Market Share data as of June 30, 2023, indicates 98.3 percent of deposits are in the non-MSA AA and only 1.7 percent of deposits are in the Longview MSA AA. Based on a substantial volume of deposits in the non-MSA AA, a full-scope review will be performed, and greater weight given to this AA. A limited-scope review will be performed on the Longview MSA AA. The institution's competitors consist of other state and federal community financial institutions, regional financial institutions, state-chartered financial institutions, and some of the largest financial institutions with regional and nation-wide footprints.

The following tables depict the demographic information for the full-scope AAs.

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

Non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	39	0.0	10.3	82.1	7.7	0.0
Population by Geography	166,541	0.0	8.0	82.1	9.9	0.0
Housing Units by Geography	76,894	0.0	7.8	83.0	9.2	0.0
Owner-Occupied Units by Geography	47,141	0.0	6.5	82.4	11.1	0.0
Occupied Rental Units by Geography	14,969	0.0	10.7	84.3	5.0	0.0
Vacant Units by Geography	14,784	0.0	9.1	83.7	7.2	0.0
Businesses by Geography	11,683	0.0	7.2	82.5	10.3	0.0
Farms by Geography	698	0.0	5.6	81.1	13.3	0.0
Family Distribution by Income Level	44,020	0.0	18.3	19.8	40.7	0.0
Household Distribution by Income Level	62,110	0.0	17.0	17.3	42.2	0.0
Median Family Income Non-MSAs – TX		\$52,198	Median Housing Value			\$97,835
			Median Gross Rent			\$686
			Families Below Poverty Level			12.8%
<i>Source: 2015 ACS Census and 2021 D&B Data. 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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Non-MSA 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	0.0	6.5	69.6	23.9	0.0
Population by Geography	174,592	0.0	5.6	69.1	25.4	0.0
Housing Units by Geography	79,157	0.0	5.7	68.8	25.5	0.0
Owner-Occupied Units by Geography	50,157	0.0	5.2	66.4	28.4	0.0
Occupied Rental Units by Geography	14,902	0.0	6.9	75.5	17.6	0.0
Vacant Units by Geography	14,098	0.0	6.3	70.2	23.5	0.0
Businesses by Geography	16,515	0.0	6.1	69.9	24.1	0.0
Farms by Geography	987	0.0	4.4	67.0	28.7	0.0
Family Distribution by Income Level	45,914	19.8	16.6	20.4	43.1	0.0
Household Distribution by Income Level	65,059	22.9	15.2	18.0	44.0	0.0
Median Family Income Non-MSAs - TX		\$61,785	Median Housing Value			\$127,995
			Median Gross Rent			\$784
			Families Below Poverty Level			10.2%
<i>Source: 2021 ACS Census and 2023 D&B Data. 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>						

For the years 2021, 2022, and 2023, the AA was comprised of census tracts in Camp, Hopkins, Rains, Wood, Cass, Franklin, Morris, and Van Zandt Counties. In 2021, the AA was comprised of 39 census tracts which consisted of no low-income census tracts, four moderate-income census tracts, 32 middle-income census tracts, and three upper-income census tracts. In 2022 and 2023, the AA was comprised of 46 census tracts which consisted of no low-income census tracts, three moderate-income census tracts, 32 middle-income census tracts, and 11 upper-income census tracts.

A community contact in the AA mentioned the need for more banks in the area to take initiative with the communities and the businesses to help face the challenges and changes during this time. Another community contact in the AA stated that local financial institutions that serve the area have good reputations with the community and maintain good consumer relationships but mentioned home mortgage loan demand in these areas continues.

Scope of Evaluation in Texas

CNB delineated two AAs in the state of Texas for analysis under the requirements of the CRA. Due to a minimal deposit and lending base, the Longview MSA received a limited-scope review while the non-MSA received a full-scope review. Refer to the table in Appendix A for a list of all AAs under review. Consistent with the institution's primary lending focus, home mortgage and consumer loans were analyzed.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The institution's performance under the lending test in the state of Texas is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the institution's lending performance in the State of Texas is reasonable.

Distribution of Loans by Income Level of the Geography

CNB exhibits reasonable geographic distribution of loans in the state. The distribution of home mortgage and consumer loans to the LMI geographies in the non-MSA AA is reasonable, considering the limited lending opportunities as there are no low-income census tracts, and only four moderate-income census tracts in 2021, and three census tracts in 2022/2023. Additionally, moderate-income census tracts represent only 8.0 percent of the total population within the AA in 2021 and only 5.6 percent in 2022/2023.

Home Mortgage Loans

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

Non-MSA AA

In 2021, the distribution of home mortgage loans to moderate-income geographies is less than the percentage of owner-occupied housing as well as the aggregate lending within the moderate-income tracts. However, lending opportunities are limited as there are no low-income census tracts and only four moderate-income census tracts in the AA. Additionally, owner-occupied units in the moderate-income census tracts represent only 6.5 percent of total owner-occupied units in the AA and the percentage of the population in these geographies is only 8.0 percent of the total population within the AA.

In 2022/2023, the distribution of home mortgage loans to moderate-income geographies is slightly less than the percentage of owner-occupied housing and equal to the aggregate lending within the moderate-income tracts. As stated before, lending opportunities are limited as there are no low-income census tracts and only three moderate-income census tracts in the AA. Additionally, owner-occupied units in the moderate-income census tracts represent only 5.2 percent of total owner-occupied units in the AA and the percentage of the population in these geographies is only 5.6 percent of the total population within the AA.

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 institution's consumer loan originations and purchases.

Non-MSA AA

In 2021, the distribution of consumer loans in moderate-income geographies exceeded the percentage of households in those geographies. There were no low-income geographies.

In 2022/2023, the distribution of consumer loans in moderate-income geographies exceeded the percentage of households in those geographies. There were no low-income geographies.

Lending Gap Analysis

The institution's loan originations in LMI geographies during the evaluation period did not reflect any unexplained conspicuous lending gaps.

Distribution of Loans by Income Level of the Borrower

CNB exhibits a reasonable distribution of loans to individuals of different income levels in the state. The distribution of home mortgage and consumer loans to the LMI individuals in the non-MSA AA is reasonable, considering demographics show that it was difficult for LMI families to obtain affordable housing including high poverty levels and high median housing costs.

Home Mortgage Loans

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

Non-MSA AA

In 2021, the distribution of home mortgage loans to low-income individuals is less than the percentage of families, however, it is above the aggregate lending. The distribution of home mortgage loans to moderate-income individuals is below both the percentage of families as well as the aggregate lending. However, demographics show that it is difficult for LMI families to obtain affordable housing. In 2021, the median family income was \$60,100, with low-income families making less than \$31,000 per year and moderate-income families making less than \$49,000 per year. Additionally, the poverty level was high at 16.3 percent and the median housing value was also high at \$98,000.

In 2022/2023, the distribution of home mortgage loans to low-income individuals is less than the percentage of families, however, it is above the aggregate lending. The distribution of home mortgage loans to moderate-income individuals is below both the percentage of families identified as well as the aggregate lending. However, demographics show that it is difficult for LMI families to obtain affordable housing. In 2022/2023, the median family income was \$73,200, with low-income families making less than \$37,000 per year and moderate-income families making less than \$59,000 per year. Additionally, the poverty level was high at 14.5 percent and the median housing value was also high at \$128,000.

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 institution's consumer loan originations and purchases.

Non-MSA AA

In 2021, the distribution of consumer loans to LMI borrowers exceeded the percentage of households identified as LMI individuals.

In 2022/2023, the distribution of consumer loans to LMI borrowers exceeded the percentage of households identified as LMI individuals.

Responses to Complaints

There were no complaints related to the institution's CRA performance within the state of Texas during the review period.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the institution's performance under the lending test in the Longview MSA AA is consistent with the institution's overall performance under the lending test in the full-scope area. A HMDA analysis was not performed as the amount of lending did not provide for a meaningful analysis; however, data was included on the tables.

COMMUNITY DEVELOPMENT TEST

The institution's performance under the community development test in the state of Texas is rated Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the institution exhibits adequate responsiveness, to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the 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 institution's level of community development lending. The table includes all community development loans, including multifamily loans that also qualify as community development loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Full-Scope				
Non-MSA AA	183	82.8	11,924	71.3
Limited-Scope				
Longview MSA AA	3	1.4	158	1.0
Broader Statewide/Regional	35	15.8	4,640	27.7
Total	221	100.0	16,722	100.0

Non-MSA AA

The level of community development lending demonstrates excellent responsiveness to the community development needs within the AA. As reflected in the table above, CNB originated 183 community development loans in the AA totaling \$11.9 million during the evaluation period, representing 10.5 percent of allocated tier 1 capital.

Examples of loans include:

- 65 PPP loans totaling \$5.1 million to small businesses to retain jobs during the COVID-19 pandemic.
- Four loans to organizations that provides community services to LMI individuals totaling \$694,000.
- 114 loans in the amount of \$6.1 million to small business that created or retained jobs for LMI individuals.

Broader Statewide Regional

CNB made 35 loans totaling \$4.6 million in the broader statewide/regional area. These loans were to small businesses to create or retain jobs.

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)
Full-Scope										
Non-MSA	2	675	29	1,379	31	41.9	2,054	6.0	0	0
Limited-Scope										
Longview MSA	1	1,338	6	1	7	9.5	1,339	4.0	0	0
Broader Statewide/Regional	24	19,684	12	10,785	36	48.6	30,469	90.0	0	0
Total	27	21,697	47	12,165	74	100.0	33,862	100.0	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.

The qualified investment table, shown above, sets forth the information and data used to evaluate the institution's level of qualified community development investments. These tables include all community development investments, including prior period investments that remain outstanding as of the evaluation period.

Non-MSA AA

The institution's performance reflects adequate responsiveness to community development needs in the AA. During the CRA evaluation period, the institution made 31 investments totaling \$2.1 million, which included two prior period investments and 29 current period investments. The prior period investments included a municipal bond to a local school district for new buildings in which the school was over 50 percent economically disadvantaged and a municipal bond for improvements to the city's water and sewer system that benefits LMI individuals. The current period investments totaled \$1.4 million and consists of three municipal bonds to local school districts for construction of and improvements to buildings in which the schools were over 50 percent economically disadvantaged, one municipal bond to a city for water and sewer improvements that benefit LMI individuals, and 25 donations made to organizations that provide various community services to LMI individuals. Investments in the AA represented 1.8 percent of allocated tier 1 capital.

Extent to Which the Bank Provides Community Development Services

Non-MSA AA

The level of community development services reflects adequate responsiveness to community development needs of the AA. During the evaluation period, employees and officers performed 358 hours of community development services to 16 organizations in the AA.

Examples of community development services in the AA include:

- Providing financial literacy to schools in which a majority of the students are economically disadvantaged.
- Providing financial literacy to LMI individuals.
- Serving on the board of organizations that provide community services for LMI individuals.

Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the institution's performance under the community development test in the Longview MSA AA is consistent with the institution's overall performance under the community development test in the full-scope area.

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:	12/31/2021 to 12/31/2023	
Institution Products Reviewed:	Home mortgage and consumer loans. Community development loans, community development services, and qualified investments.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Texas		
Non-MSA AA	Full-Scope	Camp, Hopkins, Rains, and Wood Counties and their entirety. Portions of Cass, Franklin, Morris, and Van Zandt Counties.
Longview MSA AA	Limited-Scope	Portions of Gregg and Upshur Counties.

Appendix B: Summary of MMSA and State Ratings

RATINGS		The City National Bank of Sulphur Springs	
Overall Bank:	Lending Test Rating*	Community Development Test Rating	Overall Bank & State Rating
Bank			
CNB	Satisfactory	Satisfactory	Satisfactory
MMSA or State:			
Texas	Satisfactory	Satisfactory	Satisfactory

(*) 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: 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/AA.

Census Tract: 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: 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: Affordable housing (including multifamily rental housing) for LMI individuals; community services targeted to LMI 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 LMI 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 financial institution's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the financial institution, and to take this record into account when evaluating certain corporate applications filed by the financial institution.

Consumer Loan: A loan 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 U. S. Census Bureau 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 an MSA to file annual summary reports of its 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 financial institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/AA.

Median Family Income: 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 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 (MSA): 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 MSA 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 MSA. For a financial institution with domestic branches in only one state, the financial institution's CRA rating would be the state rating. If a financial institution maintains domestic branches in more than one state, the financial institution will receive a rating for each state in which those branches are located. If a financial institution maintains domestic branches in two or more states within a multi-state MSA, the financial institution will receive a rating for the multi-state MSA.

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

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 multi-state MSAs, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the institution 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 multi-state MSA/AA. 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 performance evaluation.

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 multi-state MSA/AA. The table also presents aggregate peer data for the years the data is available.

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

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

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.

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 AA.

- 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 \$500,000) 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 multi-state MSA/AA.

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 O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Non-MSA	505	98,738	97.9	5,385	0.0	0.0	0.0	6.5	3.2	7.4	82.4	82.8	81.3	11.1	14.1	11.3	0.0	0.0	0.0
Longview MSA	11	1,374	2.1	507	0.0	0.0	0.0	0.0	0.0	0.0	100.0	100.0	100.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	516	100,112	100.0	5,892	0.0	0.0	0.0	6.0	3.1	6.8	83.9	83.1	82.9	10.2	13.8	10.3	0.0	0.0	0.0

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																	2022-2023		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Non-MSA	713	158,117	98.1	3,994	0.0	0.0	0.0	5.2	5.0	5.0	66.4	67.9	67.4	28.4	27.1	27.6	0.0	0.0	0.0
Longview MSA	14	1,985	1.9	411	0.0	0.0	0.0	38.1	50.0	45.0	61.9	50.0	55.0	0.0	0.0	0.0	0.0	0.0	0.0
Total	727	160,102	100.0	4,405	0.0	0.0	0.0	7.6	5.9	8.7	66.1	67.5	66.3	26.4	26.5	25.0	0.0	0.0	0.0

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA 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 P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2021		
Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Non-MSA	505	98,738	97.9	21.2	3.8	3.0	18.3	7.3	10.7	19.8	16.8	18.1	40.7	65.3	45.7	0.0	6.7	22.5	
Longview MSA	11	1,374	2.1	26.5	0.0	3.2	17.8	18.2	16.6	14.1	9.1	22.7	41.5	45.5	34.3	0.0	27.3	23.3	
Total	516	100,112	100.0	21.7	3.7	3.0	18.3	7.6	11.2	19.3	16.7	18.5	40.8	64.9	44.7	0.0	7.2	22.6	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																	2022-2023		
Assessment Area:	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	
Non-MSA	713	158,117	98.1	19.8	4.1	3.1	16.6	11.5	13.5	20.4	18.1	21.1	43.1	56.2	43.0	0.0	10.1	19.3	
Longview MSA	14	1,985	1.9	23.9	0.0	5.1	17.6	21.4	17.3	25.8	0.0	20.2	32.7	64.3	38.4	0.0	14.3	19.0	
Total	727	160,102	100.0	20.2	4.0	3.3	16.7	11.7	13.8	20.9	17.7	21.0	42.2	56.4	42.6	0.0	10.2	19.2	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 HMDA 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 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
Non-MSA	20	199	100.0	0.0	0.0	7.5	10.0	82.9	75.0	9.6	15.0	0.0	0.0
Longview MSA	20	350	100.0	0.0	0.0	0.0	0.0	100.0	100.0	0.0	0.0	0.0	0.0
Total	40	549	100.0	0.0	0.0	6.8	5.0	84.4	87.5	8.8	7.5	0.0	0.0

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

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography												2022-2023	
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
Non-MSA	20	260	100.0	0.0	0.0	5.6	10.0	68.5	70.0	25.9	20.0	0.0	0.0
Longview MSA	20	175	100.0	0.0	0.0	44.1	60.0	55.9	40.0	0.0	0.0	0.0	0.0
Total	40	435	100.0	0.0	0.0	8.9	35.0	67.4	55.0	23.7	10.0	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.

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
Non-MSA	20	199	100.0	23.5	25.0	17.0	20.0	17.3	15.0	42.2	40.0	0.0	0.0
Longview MSA	20	350	100.0	26.4	20.0	15.4	20.0	17.3	25.0	40.9	35.0	0.0	0.0
Total	40	549	100.0	23.8	22.5	16.0	20.0	17.3	20.0	42.1	37.5	0.0	0.0

*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												2022-2023	
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
Non-MSA	20	260	100.0	22.9	25.0	15.2	25.0	18.0	10.0	44.0	35.0	0.0	5.0
Longview MSA	20	175	100.0	24.8	25.0	20.0	15.0	16.9	30.0	38.3	30.0	0.0	0.0
Total	40	435	100.0	23.0	25.0	15.7	20.0	17.9	20.0	43.5	32.5	0.0	2.5

*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.