

# TrustTexas Bank, SSB

## Public Comments

### ***§345.43 Content and Availability of Public File***

The regulation pertaining to CRA requires the Bank to maintain these files and make them available to the public. Per regulation:

*(1) "All written comments received from the public for the current year and each of the prior two calendar years that specifically relate to the bank's performance in helping to meet community credit needs, and any response to the comments by the bank, if neither the comments nor the responses contain statements that reflect adversely on the good name or reputation of any persons other than the bank or publication of which would violate specific provisions of law."*

There were not any public comments received during 2022.

There were not any public comments received during 2023.

There have not been any public comments received during the first quarter of 2024.

# TrustTexas Bank, SSB

## CRA Performance Evaluation Public Disclosure

### ***§345.43 Content and Availability of Public File***

The regulation pertaining to CRA requires the Bank to maintain these files and make them available to the public. Per regulation:

*(2) "A copy of the public section of the bank's most recent CRA Performance Evaluation prepared by the FDIC. The bank shall place this copy in the public file within 30 business days after its receipt from the FDIC."*

The most current Community Reinvestment Act Performance Evaluation Public Disclosure is dated July 18, 2022.

# **PUBLIC DISCLOSURE**

July 18, 2022

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

TrustTexas Bank, SSB  
Certificate Number: 28515

121 East Courthouse  
Cuero, Texas 77954

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Dallas Regional Office

600 North Pearl Street, Suite 700  
Dallas, Texas 75201

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

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## INSTITUTION RATING

**INSTITUTION'S CRA RATING:** This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment areas, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

TrustTexas Bank, SSB's satisfactory Lending Test record insufficiently lifted by its outstanding Community Development Test record support the overall Community Reinvestment Act (CRA) rating.

**The Lending Test is rated Satisfactory.**

- The loan-to-deposit ratio (LTD) is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and assessment area credit needs.
- A majority of loans and other lending related activities are in the institution's assessment areas.
- The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas.
- The distribution of borrower profile reflects, given the demographics of the assessment areas, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes.
- The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

**The Community Development Test is rated Outstanding.**

The institution's community development performance demonstrates excellent responsiveness to community development needs in its assessment areas through community development (CD) loans, qualified investments (QIs), and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas. An excellent record regarding the bank's community development lending supported by excellent responsiveness to community development needs, without simply ignoring the other types of community development activities, primarily support the overall excellent rating. The bank demonstrated an excellent record regarding its QIs and an adequate record regarding its CD services.

## DESCRIPTION OF INSTITUTION

TrustTexas Bank, SSB (TTB), a \$386.1 million bank headquartered in Cuero, Texas, began operations in 1921 as Cuero Federal Savings and Loan Association. In 1997, the institution converted to a state savings bank under the name Cuero State Bank, s.s.b, and in 2006, it expanded its markets and products, upgraded its technology infrastructure, and changed its name to TrustTexas Bank, SSB. TrustTexas Mutual Holding Company, Cuero, Texas, wholly owns TrustTexas Financial Group, Inc., Cuero, Texas, which wholly owns TTB. TTB received a Satisfactory rating at its previous June 10, 2019 Federal Deposit Insurance Corporation (FDIC) CRA Performance Evaluation based on CRA Small Bank Examination Procedures.

TTB functions as a retail bank that operates from six full-service offices within four assessment areas throughout the State of Texas. The bank did not participate in any merger or acquisition activities since the previous evaluation nor did the bank open or close any offices. However, the bank did open a loan production office in Hutto, Texas in May 2021, which increased the bank's level of residential lending.

While the bank currently maintains a residential focus, they offer a variety of loan products including agricultural, residential, consumer, and commercial loans. Deposit services include checking accounts, savings accounts, money market deposit accounts, certificates of deposits, and individual retirement accounts. Alternative banking services include online banking, 24-hour telephone banking, night depository, mobile banking, and automated teller machines (ATM). The bank maintains six ATMs, one at each full-service office. The bank's services and business hours are consistent with area and industry norms.

As of March 31, 2022, assets totaled approximately \$386.1 million, consisting primarily of net loans and leases of \$162.7 million, cash of \$36.9 million, and securities of \$160.1 million. Total deposits reflected approximately \$357.6 million as of the same date. Since the last evaluation, on average per year, total assets increased 4.8 percent, net loans decreased 2.3 percent, and total deposits increased 6.9 percent.

As shown in the following table, the loans outstanding as of March 31, 2022, reflect a distribution generally consistent with the loans originated and purchased during 2021, as discussed under the Scope of Evaluation. Residential lending (Secured by 1-4 Family and Secured by Multifamily) at 61.5 percent by dollar volume represent the largest loan category with commercial loans (Secured by Nonfarm Nonresidential and Commercial and Industrial) representing 23.8 percent.

<b>Loan Portfolio Distribution as of 03/31/2022</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	3,977	2.4
Secured by Farmland	10,891	6.6
Secured by 1-4 Family Residential Properties	101,020	61.5
Secured by Multifamily (5 or more) Residential Properties	21	<0.1
Secured by Nonfarm Nonresidential Properties	21,862	13.2
<b>Total Real Estate Loans</b>	<b>137,771</b>	<b>83.8</b>
Commercial and Industrial Loans	17,492	10.6
Agricultural Production and Other Loans to Farmers	6,257	3.8
Consumer Loans	2,720	1.7
Other Loans	109	<0.1
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>164,349</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		

Based on the information discussed in this section, as well as other regulatory data, TTB's financial condition, size, product offerings, prior performance, and lack of legal impediments did not affect the institution's ability to meet its assessment areas' credit needs.

## **DESCRIPTION OF ASSESSMENT AREAS**

The CRA requires each financial institution to define one or more assessment areas (AAs) within which examiners will evaluate its CRA performance. TTB designated four assessment areas consisting of: 1) Victoria and Goliad Counties in the Victoria Metropolitan Statistical Area (MSA) (Victoria MSA AA), 2) Guadalupe and Comal Counties in the San Antonio-New Braunfels MSA (San Antonio MSA AA), 3) Hays, Williamson, and Travis Counties in the Austin-Round Rock-Georgetown MSA (Austin MSA AA), and 4) Calhoun and Dewitt Counties in the Texas Non-MSA (Non-MSA AA). Since the previous evaluation and following the establishment of the loan production office, the bank amended its Austin MSA AA to include Williamson and Travis Counties. The assessment areas meet the requirements of the CRA regulations.

The following table provides a description of the four assessment areas while this evaluation contains detailed information regarding each assessment area in the applicable Description of Institution's Operations section.

<b>Description of Assessment Areas</b>			
<b>Assessment Area</b>	<b>Counties in Assessment Area</b>	<b># of Census Tracts</b>	<b># of Branches</b>
Austin MSA AA	Hays, Williamson, Travis	332	1
Non-MSA AA	Dewitt, Calhoun	11	2
San Antonio MSA AA	Comal, Guadalupe	53	1
Victoria MSA AA	Victoria, Goliad	25	2
<i>Source: Bank Data</i>			

The combined assessment area contains 421 census tracts with the following income designations based on 2015 American Community Survey (ACS) Census data: 39 low-income, 83 moderate-income, 152 middle-income, and 139 upper-income, as well as eight census tracts with no income designation. The Federal Emergency Management Agency (FEMA) made two major disaster declarations since the prior evaluation related to the COVID-19 pandemic and a severe winter storm which include all four designated assessment areas.

## **SCOPE OF EVALUATION**

### **General Information**

This evaluation covers the period from the prior evaluation dated June 10, 2019, to the current evaluation dated July 18, 2022. Examiners used the Interagency Intermediate Small Institution Examination Procedures to evaluate TTB's CRA performance. These procedures include two tests: the CRA Small Bank Lending Test and the Community Development Test. The Appendices list the criteria used under each test.

As previously noted, the bank operates in four separate assessment areas in Texas. The following table shows the percentage of loans, deposits, and branches within each assessment area. For this evaluation, examiners used full-scope procedures to analyze the Victoria MSA AA since it generates the second largest percentage of loans and deposits, and has one third of the bank's branches. Additionally, examiners performed a full-scope review of the Austin MSA AA since it generates the largest percentage of loans and has not previously been reviewed using full-scope procedures. Consequently, this evaluation used limited-scope procedures in reviewing the San Antonio MSA AA and the Non-MSA AA. Examiners weighed each area consistent with that area's overall lending level reflected in the below table.

<b>Assessment Area Breakdown of Loans, Deposits, and Branches</b>						
<b>Assessment Area</b>	<b>Loans</b>		<b>Deposits</b>		<b>Branches</b>	
	<b>\$(000s)</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>
Austin MSA AA	19,506	35.9	18,506	5.7	1	16.7
Non-MSA AA	12,880	23.7	201,111	62.3	2	33.3
San Antonio MSA AA	5,387	9.9	15,113	4.7	1	16.7
Victoria MSA AA	16,572	30.5	88,095	27.3	2	33.3
<b>Total</b>	<b>54,345</b>	<b>100.0</b>	<b>322,825</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>
<i>Source: 2021 Bank Data; FDIC Summary of Deposits (06/30/2021)</i>						

### **Activities Reviewed**

For the Lending Test, examiners considered the dollar volume lending emphasis revealed in the table below as well as management's stated business strategy, to determine the bank's major product lines from which to complete analysis. As shown, home mortgage lending, which comprised 46.7 percent of total loans by dollar volume represented the bank's primary loan product. The next largest products include commercial loans representing 21.8 percent by dollar volume and agricultural loans at 21.0 percent. However, after dividing the loans into their respective assessment



areas, examiners determined there were not enough agricultural loans in any assessment area to reach a meaningful conclusion; therefore, examiners did not review agricultural lending and this evaluation does not discuss them. Since the consumer loan volume did not represent a major product line, and thus would not materially affect any conclusions or ratings, this evaluation also does not discuss them. Bank records indicated that the lending focus and product mix remained consistent throughout the evaluation period.

The following table shows the bank's originations and purchases over the most recent calendar year by loan type.

<b>Loans Originated or Purchased</b>				
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>	<b>#</b>	<b>%</b>
Construction and Land Development	6,068	8.3	19	5.8
Secured by Farmland	4,592	6.3	7	2.1
Secured by 1-4 Family Residential Properties	34,070	46.7	98	29.9
Multi-Family (5 or more) Residential Properties	0	0.0	0	0.0
Commercial Real Estate Loans	3,497	4.8	9	2.7
Commercial and Industrial Loans	12,377	17.0	61	18.6
Agricultural Loans	10,735	14.7	53	16.2
Consumer Loans	1,616	2.2	81	24.7
<b>Total Loans</b>	<b>72,955</b>	<b>100.0</b>	<b>328</b>	<b>100.0</b>
<i>Source: 2021 Bank Data</i>				

This evaluation considers home mortgage loans reported on the bank's Home Mortgage Disclosure Act (HMDA) Loan Application Registers. This includes 2019 data showing 82 loans totaling \$23.4 million, 2020 data showing 113 loans totaling \$36.7 million, and 2021 data showing 103 loans totaling \$34.9. Examiners did not identify any trends between the years' data that materially affect conclusions. Therefore, this evaluation presents geographic and borrower profile lending distribution information for 2020, the most recent year for which aggregate data is available. Aggregate HMDA data for 2020 provided the standard of comparison for the reviewed home mortgage loans. Due to the limited number of HMDA loans in each assessment area, examiners determined the Victoria MSA AA, Austin MSA AA, and San Antonio MSA AA originated a sufficient number of loans for analysis. Therefore, these areas include geographic distribution and borrower profile analysis tables for HMDA lending.

In addition, as shown in the table above, TTB originated 70 commercial loans totaling approximately \$15.8 million in 2021, of which 67 loans totaling \$8.8 million met the definition of small business. To assess performance, examiners considered the entire universe of small business loans. However, due to the limited number of small business loans originated within each assessment area, examiners determined only the Victoria MSA AA and the Non-MSA AA originated enough loans for analysis. Therefore, only these two assessment areas contain geographic distribution and borrower profile analysis tables for small business lending. D&B data for 2021 provided the standard of comparison for the reviewed small business loans.

As reflected in the following table, examiners considered the universes by dollar volume and number of loans originated in 2021, as well as management's stated business strategy to determine the weighting applied to the loan categories reviewed, when arriving at applicable conclusions. Consequently, home mortgage loans received heavier weighting when arriving at overall conclusions.

Loan Products Reviewed				
Loan Category	Universe			
	#	%	\$(000s)	%
Home Mortgage	103	60.6	34,965	79.8
Small Business	67	39.4	8,840	20.2
<b>Totals</b>	<b>170</b>	<b>100.0</b>	<b>43,805</b>	<b>100.0</b>
<i>Source: 2021 HMDA Reported Data; 2021 Bank Data</i>				

For the Community Development Test, bank management provided data on CD loans, QIs, and CD services since the prior CRA evaluation dated June 10, 2019. The scope of this evaluation also considered all prior period QIs purchased prior to the previous evaluation and still outstanding as of this evaluation's date.

## CONCLUSIONS ON PERFORMANCE CRITERIA

### LENDING TEST

TTB demonstrated a satisfactory record regarding the Lending Test for the institution as a whole. A reasonable record regarding the LTD ratio, a majority of loans originated within the bank's assessment areas, and reasonable records regarding geographic distribution and borrower profile support this conclusion.

### Loan-to-Deposit Ratio

The LTD ratio is reasonable (considering seasonal variations and taking into account lending-related activities) given the institution's size, financial condition, and assessment area credit needs. The LTD ratio, calculated from Report of Condition and Income data, averaged 54.9 percent over the past 12 calendar quarters from June 30, 2019, to March 31, 2022, representing a small decrease from the 57.2 percent average, net LTD ratio recorded at the prior evaluation. The ratio ranged from a high of 61.0 at June 20, 2019, to a low of 45.5 percent as of March 31, 2022, with no discernable trend during the evaluation period.

The following table demonstrates three comparable institutions operating within TTB's assessment areas, reflecting somewhat similar asset sizes and lending emphasis. The table demonstrates that two of the three comparable banks reported average, net LTD ratios slightly higher than TTB's average, net LTD ratio, with the highest ratio sitting 1.3 percentage points above TTB's ratio.

<b>Loan-to-Deposit (LTD) Ratio Comparison</b>		
<b>Bank</b>	<b>Total Assets as of 12/31/2021 (\$000s)</b>	<b>Average Net LTD Ratio (%)</b>
<b>TrustTexas Bank, SSB, Cuero, TX, Dewitt Co., TX</b>	386,098	54.9
Crossroads Bank, Yoakum, TX, Dewitt Co., TX	311,114	55.9
First National Bank, Port Lavaca, TX, Calhoun Co., TX	387,817	56.2
The Yoakum National Bank, Yoakum, TX, Dewitt Co., TX	246,877	51.5
<i>Source: Reports of Condition and Income (06/30/2019 – 03/31/2022)</i>		

### **Assessment Area Concentration**

A majority of loans and other lending-related activities are in the institution's assessment areas. A majority of home mortgage and small business loans originated inside the assessment areas support this conclusion. Examiners considered the bank's asset size and office structure, as well as the loan products reviewed, relative to the assessment areas' size and economy, when arriving at this conclusion.

The following table shows that for both home mortgage and small business lending, the bank originated majorities by number and by dollar volume inside its assessment areas.

<b>Lending Inside and Outside of the Assessment Area</b>										
	<b>Number of Loans</b>					<b>Dollar Amount of Loans \$(000s)</b>				
<b>Loan Category</b>	<b>Inside</b>		<b>Outside</b>		<b>Total</b>	<b>Inside</b>		<b>Outside</b>		<b>Total</b>
	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>\$</b>	<b>%</b>	<b>\$</b>	<b>%</b>	<b>\$(000s)</b>
Home Mortgage										
2019	65	79.3	17	20.7	82	18,595	79.3	4,845	20.7	23,440
2020	95	84.1	18	15.9	113	32,465	88.4	4,270	11.6	36,735
2021	88	85.4	15	14.6	103	29,970	85.7	4,995	14.3	34,965
<b>Subtotal</b>	<b>248</b>	<b>83.2</b>	<b>50</b>	<b>16.8</b>	<b>298</b>	<b>81,030</b>	<b>85.2</b>	<b>14,110</b>	<b>14.8</b>	<b>95,140</b>
Small Business	58	86.6	9	13.4	67	7,578	85.7	1,262	14.3	8,840
<i>Source: 2021 Bank Data; 2019, 2020, 2021 HMDA Reported Data Due to rounding, totals may not equal 100.0%</i>										

### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the assessment areas. Reasonable performances in the Austin MSA AA, Victoria MSA AA, San Antonio MSA AA, and Non-MSA AA support this conclusion. Examiners considered the loan product types reviewed relative to the available comparative data and any performance context issues when arriving at this conclusion. They focused on the percentages by the number of loans in low- and moderate-income geographies when arriving at conclusions. This analysis only considered loans originated within the bank's assessment areas. Please see the following assessment area sections for the individual assessment areas' performances.

## **Borrower Profile**

The distribution of borrowers reflects, given the demographics of the assessment areas, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes. Reasonable performances in the Austin MSA AA, Victoria MSA AA, Non-MSA AA, and the San Antonio MSA AA support this conclusion. Examiners considered the loan product types reviewed relative to the available comparative data and any performance context issues when arriving at this conclusion. They focused on the percentages by the number of loans when arriving at conclusions. Please see the following assessment area sections for the individual assessment areas' performances.

## **Response to Complaints**

The institution did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

## **COMMUNITY DEVELOPMENT TEST**

TTB demonstrated an outstanding record regarding the Community Development Test. The institution's community development performance demonstrates excellent responsiveness to community development needs in its combined assessment areas through CD loans, QIs, and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas. An excellent record regarding the bank's community development lending and excellent responsiveness to community development needs, without simply ignoring the other types of community development activities, primarily support the rating. The bank demonstrated an excellent record regarding its QIs and an adequate record regarding its CD services.

## **Community Development Loans**

The bank exhibited an excellent record regarding its CD loans. An excellent level regarding the dollar volume of CD loans primarily supports this conclusion. Examiners evaluated the number and dollar volume relative to the considerations noted for the Community Development Test when arriving at this conclusion.

The following tables show the bank granted 72 CD loans totaling \$13.4 million. The total dollar volume equates to 3.7 percent of average total assets of \$361.0 million and 7.8 percent of average net loans of \$172.6 million for the same period. The current levels reflect excellent performance.

As seen in the following tables, the majority of the CD loans benefit activities that promote revitalization or stabilization and economic development, which demonstrates the bank's responsiveness to an identified community development need. In addition, the bank worked with the Small Business Administration (SBA) to make small business loans through programs under the Coronavirus Aid, Relief, and Economic Security (CARES) Act. The tabled data below includes 69 Paycheck Protection Program (PPP) loans totaling \$6.3 million originated in 2020, further illustrating the bank's responsiveness efforts. Finally, the bank provided loan modifications to

customers experiencing financial hardships, demonstrating additional responsiveness to community needs.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
2019 (Partial)	0	0	0	0	0	0	0	0	0	0
2020	2	2,375	0	0	0	0	69	6,345	71	8,720
2021	0	0	0	0	1	4,750	0	0	1	4,750
YTD 2022	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>2</b>	<b>2,375</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>4,750</b>	<b>69</b>	<b>6,345</b>	<b>72</b>	<b>13,470</b>
<i>Source: Bank Data</i>										

The following table shows the distribution of the QIs by assessment area and purpose.

Community Development Lending by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Austin MSA AA	1	1,875	0	0	0	0	8	291	9	2,166
Non-MSA AA	0	0	0	0	1	4,750	22	466	23	5,216
San Antonio MSA AA	0	0	0	0	0	0	5	405	5	405
Victoria MSA AA	0	0	0	0	0	0	32	5,152	32	5,152
Statewide/Regional	1	500	0	0	0	0	2	31	3	531
<b>Total</b>	<b>2</b>	<b>2,375</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>4,750</b>	<b>69</b>	<b>6,345</b>	<b>72</b>	<b>13,470</b>
<i>Source: Bank Data</i>										

The following highlights a qualified CD loan provided by the bank at the statewide/regional level.

- **Affordable Housing** – The bank originated a \$500,000 loan for the purchase of a 16-unit apartment complex located in a moderate-income census tract within the Killeen-Temple MSA. Low- and moderate-income tenants pay a rent of \$500 a month for these one-bedroom units, which falls well below the average market rent in the area for a one bedroom of \$625.

### **Qualified Investments**

The institution displayed an excellent record regarding its QIs. An excellent level regarding the dollar volume of QIs primarily supports this conclusion. Examiners evaluated the number and dollar volume of QIs relative to the considerations noted for the Community Development Test when arriving at this conclusion.

The following tables show that the bank made use of 105 QIs totaling \$23.0 million, which includes 84 donations totaling \$208 thousand. The total dollar volume equates to 6.3 percent of average total

assets of \$361.0 million and 17.3 percent of average securities of \$132.3 million for the same period. The current level reflects excellent performance.

The following tables indicate, by dollar volume, the majority of QIs supported activities promoting revitalization and stabilization. These efforts demonstrate the bank's responsiveness to an identified community development need.

Qualified Investments										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	1	446	0	0	3	2,000	4	2,446
2019 (Partial)	0	0	0	0	0	0	0	0	0	0
2020	0	0	3	4,609	0	0	5	3,910	8	8,519
2021	0	0	1	1,000	0	0	6	7,705	7	8,705
YTD 2022	0	0	0	0	0	0	2	3,124	2	3,124
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>6,055</b>	<b>0</b>	<b>0</b>	<b>16</b>	<b>16,739</b>	<b>21</b>	<b>22,794</b>
Qualified Grants & Donations	3	15	79	93	2	100	0	0	84	208
<b>Total</b>	<b>3</b>	<b>15</b>	<b>84</b>	<b>6,148</b>	<b>2</b>	<b>100</b>	<b>16</b>	<b>16,739</b>	<b>105</b>	<b>23,002</b>
<i>Source: Bank Data</i>										

The following table shows the distribution of the QIs by assessment area and purpose. As shown, all of the QIs benefitted one of the bank's designated assessment areas.

Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Austin MSA AA	0	0	4	2	0	0	1	700	5	702
Non-MSA AA	3	15	66	6,131	2	100	15	16,039	86	22,285
San Antonio MSA AA	0	0	0	0	0	0	0	0	0	0
Victoria MSA AA	0	0	14	15	0	0	0	0	14	15
<b>Total</b>	<b>3</b>	<b>15</b>	<b>84</b>	<b>6,148</b>	<b>2</b>	<b>100</b>	<b>16</b>	<b>16,739</b>	<b>105</b>	<b>23,002</b>
<i>Source: Bank Data</i>										

### **Community Development Services**

The bank established an adequate record of providing CD services. Adequate performance regarding the level of services primarily supports this conclusion. Examiners evaluated the level of services relative to the considerations noted for the Community Development Test when arriving at this conclusion.

The following table shows the bank provided 82 CD services since the last evaluation. This number equates to an average of 4.4 CD services, per office, per year. The services all involve bank

personnel's use of their technical expertise to benefit organizations or projects with a primary purpose of community development, as defined by the CRA regulation. The current level reflects adequate performance relative to the considerations noted for the Community Development Test.

The CD services primarily address community services for low- and moderate-income individuals followed by affordable housing, which demonstrates the bank's responsiveness to identified community development needs.

<b>Community Development Services</b>					
<b>Activity Year</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
2019 (Partial)	2	22	1	0	<b>25</b>
2020	2	20	1	0	<b>23</b>
2021	2	18	1	0	<b>21</b>
YTD 2022	1	11	1	0	<b>13</b>
<b>Total</b>	<b>7</b>	<b>71</b>	<b>4</b>	<b>0</b>	<b>82</b>
<i>Source: Bank Data</i>					

The following table shows the distribution of the CD services by assessment area and purpose. As shown, all of the CD services benefitted one of the bank's designated assessment areas.

<b>Community Development Services by Assessment Area</b>					
<b>Assessment Area</b>	<b>Affordable Housing</b>	<b>Community Services</b>	<b>Economic Development</b>	<b>Revitalize or Stabilize</b>	<b>Totals</b>
	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>	<b>#</b>
Austin MSA AA	0	0	1	0	<b>1</b>
Non-MSA AA	7	39	3	0	<b>49</b>
San Antonio-MSA AA	0	14	0	0	<b>14</b>
Victoria MSA AA	0	18	0	0	<b>18</b>
<b>Total</b>	<b>7</b>	<b>71</b>	<b>4</b>	<b>0</b>	<b>82</b>
<i>Source: Bank Data</i>					

In addition to the adequate number of services, the retail banking structure benefits low- and moderate-income individuals through its branch network. The bank currently operates two branches and ATMs in moderate-income census tracts within its designated assessment areas.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

## AUSTIN MSA AA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN AUSTIN MSA AA

The Austin MSA AA includes all 332 census tracts within Hays, Travis, and Williamson Counties located in the Austin-Round Rock-Georgetown, TX MSA. The table below outlines the office locations in the Austin MSA AA.

Office Location Austin MSA AA				
County/City/Office	Office Type	Census Tract Number	Census Tract Income Level	Office Opened or Closed Since Last Evaluation
<b>Hays County</b> Kyle Branch, Kyle, Texas	Branch	0109.09	Upper	No
<i>Source: Bank Data; 2015 ACS Data</i>				

### Economic and Demographic Data

The area’s 332 census tracts reflect the following income designations based on 2015 ACS Census data: 37 low-, 67 moderate-, 121 middle-, and 101 upper-income census tracts. An additional six census tracts do not include an income designation.

The area includes 703,773 housing units. Of these, 52.8 percent are owner-occupied, 39.8 percent are occupied rental units, and 7.5 percent are vacant. The geographic distribution criterion considers the distribution of owner-occupied housing units.

Examiners used the 2020 Federal Financial Institutions Examination Council (FFIEC)-updated median family income level to analyze home mortgage loans under the borrower profile criterion. The following table presents the low-, moderate-, middle- and upper-income categories, based on the 2020 FFIEC-updated median family income of \$97,600 for the Austin, TX MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2020 (\$97,600)	<\$48,800	\$48,800 to <\$78,080	\$78,080 to <\$117,120	≥\$117,120
<i>Source: FFIEC</i>				

The following table illustrates select demographic characteristics of the assessment area.



Demographic Information of the Assessment Area Austin MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	332	11.1	20.2	36.4	30.4	1.8
Population by Geography	1,772,799	10.7	20.4	36.6	31.1	1.2
Housing Units by Geography	703,773	10.7	18.7	37.7	32.0	0.9
Owner-Occupied Units by Geography	371,405	4.1	15.8	39.5	40.5	0.2
Occupied Rental Units by Geography	279,968	19.1	22.5	35.4	21.2	1.8
Vacant Units by Geography	52,400	13.2	19.2	36.5	29.4	1.7
Businesses by Geography	247,638	6.4	11.6	33.5	47.2	1.2
Farms by Geography	4,850	4.9	13.2	38.5	43.0	0.4
Family Distribution by Income Level	401,265	22.1	16.5	19.7	41.7	0.0
Household Distribution by Income Level	651,373	23.3	16.4	18.0	42.3	0.0
Median Family Income MSA - 12420 Austin-Round Rock-Georgetown, TX MSA		\$78,997	Median Housing Value			\$240,486
			Median Gross Rent			\$1,074
			Families Below Poverty Level			9.4%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

The service industry represents the largest industry in the area at 42.1 percent of total businesses followed by non-classifiable establishments at 19.9 percent; retail trade at 10.7 percent; and finance, insurance, and real estate at 10.7 percent. Major employers in the assessment area include University of Texas at Austin, Dell Inc., Seton Healthcare Network, Walmart, Inc., St. David's Healthcare, Samsung Austin Semiconductor, Apple Computer, and IBM Corp.

Travis, Williamson, and Hays Counties reported May 2022, unemployment rates of 2.6 percent, 2.7 percent, and 2.8 percent, respectively, compared to the State of Texas' unemployment rate of 3.8 percent and the national average of 3.4 percent.

### **Competition**

The bank's Austin MSA AA contains a high level of competition from other chartered institutions based on its population, with each of the 418 offices from its 65 institutions serving approximately 4,241 people. TTB ranks 62<sup>nd</sup> in deposit market share within the Austin MSA AA, capturing approximately 0.03 percent of the assessment area's deposits based on the June 30, 2021, FDIC Deposit Market Share Report. Overall, the competition level allows for lending opportunities.

## **Community Contact**

As part of the evaluation process, examiners contact third parties active in the assessment area to assist in identifying the credit and community needs. This information helps determine financial institutions' responsiveness to these needs and shows available credit opportunities.

Examiners used a community contact familiar with the area's business and economic environment. The contact stated that the area was experiencing growth with prevalent credit needs for small business and home mortgage loans. The contact indicated that Austin MSA AA includes diverse industries, where most of the population must commute due to the increasing home prices.

## **Credit and Community Development Needs and Opportunities**

The Austin MSA AA creates a range of lending opportunities for a variety of loan products. Due to local economic conditions and continuing development within the MSA, the area enjoys a diversified economy including significant concentrations of service, retail, and finance organizations.

Considering information from the community contact, bank management, as well as demographic and economic data, examiners determined that home mortgage lending and small business lending represents the primary credit needs of the assessment area. With respect to the area's community development needs, examiners considered that over one-third, or 38.6 percent, of the area's families report either low or moderate incomes. These characteristics typically suggest a higher need for activities that aid in providing community services targeted to low- and moderate-income individuals as well as affordable housing.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN AUSTIN MSA AA**

### **LENDING TEST**

TTB demonstrated a satisfactory record regarding the Lending Test in the Austin MSA AA. Reasonable geographic distribution and borrower profile performances support this conclusion. As noted under the Scope of Evaluation section, examiners reviewed only HMDA data in the Austin MSA AA due to the limited number of originated small business loans.

### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the Austin MSA AA. Reasonable home mortgage performance supports this conclusion.

### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans within the Austin MSA AA reflects reasonable performance. Reasonable levels of lending in low- and moderate-income geographies supports this conclusion.

The following table shows that the bank's level of lending in low-income geographies exceeds

aggregate data by 4.1 percentage points, reflecting reasonable performance. The table further shows that the bank's level of lending in moderate-income geographies falls below aggregate data by 3.0 percentage points, also reflecting reasonable performance.

<b>Geographic Distribution of Home Mortgage Loans Austin MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	4.1	3.4	4	7.5	930	3.8
Moderate	15.8	12.4	5	9.4	3,295	13.3
Middle	39.5	41.0	19	35.8	5,715	23.1
Upper	40.5	43.1	23	43.4	14,435	58.4
Not Available	0.2	0.1	2	3.8	340	1.4
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>53</b>	<b>100.0</b>	<b>24,715</b>	<b>100.0</b>
<i>Source: 2015 ACS Data; 2020 HMDA Reported Data; 2020 HMDA Aggregate Data Due to rounding, totals may not equal 100.0</i>						

### **Borrower Profile**

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) in the Austin MSA AA. Reasonable performances regarding home mortgage lending support this conclusion.

### ***Home Mortgage Loans***

The distribution of home mortgage loans to individuals of different income levels within the Austin MSA AA reflects reasonable performance. Reasonable lending to low- and moderate-income borrowers supports this conclusion.

The following table shows that the bank's level of lending to low-income borrowers slightly exceeds aggregate data by 2.4 percentage points, reflecting reasonable performance. The table further shows that the bank's level of lending to moderate-income borrowers trails aggregate data by 5.2 percentage points, also reflecting reasonable performance.

Distribution of Home Mortgage Loans by Borrower Income Level Austin MSA AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	22.1	3.3	3	5.7	305	1.2
Moderate	16.5	14.6	5	9.4	1,075	4.4
Middle	19.7	20.1	8	15.1	1,880	7.6
Upper	41.7	46.2	31	58.5	17,615	71.3
Income Not Available	0.0	15.8	6	11.3	3,840	15.5
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>53</b>	<b>100.0</b>	<b>24,715</b>	<b>100.0</b>
Source: 2015 ACS Data; 2020 HMDA Reported Data; 2020 HMDA Aggregate Data Due to rounding, totals may not equal 100.0						

## COMMUNITY DEVELOPMENT TEST

The bank demonstrated an adequate record regarding the Community Development Test in the Austin MSA AA. The institution's community development performance demonstrates adequate responsiveness to community development needs in its assessment area through CD loans, QIs, and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment area. An adequate record regarding the bank's CD loans and QIs, without simply ignoring CD services, supports the overall rating.

### Community Development Loans

The bank exhibited an adequate record regarding its CD loans in the Austin MSA AA. An adequate level regarding the dollar volume of CD loans primarily supports this conclusion.

As shown in the table below, TTB originated 9 CD loans totaling approximately \$2.2 million in the Austin MSA AA. This level equates to 16.1 percent of the bank's overall excellent level of CD loans by dollar volume. As noted, this area accounted for 35.9 percent of the overall lending volume; therefore, the current levels reflect adequate performance. As shown, the loans benefited affordable housing and revitalization and stabilization efforts within the Austin MSA AA, which demonstrates adequate responsiveness to identified community development needs.

Community Development Lending Austin MSA AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
2019 (Partial)	0	0	0	0	0	0	0	0	0	0
2020	1	1,875	0	0	0	0	8	291	9	2,166
2021	0	0	0	0	0	0	0	0	0	0
YTD 2022	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>1</b>	<b>1,875</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>8</b>	<b>291</b>	<b>9</b>	<b>2,166</b>
<i>Source: Bank Data</i>										

The following provides an example of the bank's community development lending in the Austin MSA AA.

- ***Affordable Housing*** – The bank originated a \$1.8 million loan for the purchase of a 20-unit multi-family complex located in a moderate-income census tract within the Austin MSA AA. Residents of this complex all report low- to moderate-incomes with units renting for \$445 monthly, substantially below the market rate of \$1,134.

### **Qualified Investments**

The institution displayed an adequate record regarding its QIs in the Austin MSA AA. An adequate level regarding the dollar volume of QIs primarily supports this conclusion.

As shown in the below table, the bank made use of five QIs totaling \$702,000 in the Austin MSA AA, reflective of adequate performance. This level equates to 3.1 percent of the bank's overall excellent level of QIs by dollar volume. As noted, this area contributed 5.7 percent of the bank's total deposits. Further, although limited, the QIs benefited revitalization and stabilization and community services for low- and moderate-income individuals within the Austin MSA AA, which demonstrates adequate responsiveness to identified community development needs.

Qualified Investments Austin MSA AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	0	0	0	0	0	0	0	0
2019 (Partial)	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	1	700	1	700
2021	0	0	0	0	0	0	0	0	0	0
YTD 2022	0	0	0	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>700</b>	<b>1</b>	<b>700</b>
Qualified Grants & Donations	0	0	4	2	0	0	0	0	4	2
<b>Total</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>700</b>	<b>5</b>	<b>702</b>
Source: Bank Data										

The following provides an example of the bank's QI activity in the Austin MSA AA.

- **Revitalize or Stabilize** – During the review period, the bank invested \$700,000 in a municipal utility district, which serves a moderate-income census tract within Williamson County. The proceeds provided for public improvements that benefit low- and moderate-income individuals.

### **Community Development Services**

The bank established a very poor record regarding its CD services in the Austin MSA AA. Very poor performance regarding the level of services primarily supports this conclusion.

The following table shows the bank provided only one CD service in the Austin MSA AA. This number equates to an average of 0.3 CD services, per office, per year. The current level reflects very poor performance. The table also shows the one CD service benefited economic development, which demonstrates the bank's responsiveness to an identified community development need.

Community Development Services Austin MSA AA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2019 (Partial)	0	0	0	0	0
2020	0	0	0	0	0
2021	0	0	0	0	0
YTD 2022	0	0	1	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
Source: Bank Data					

The following provides a description of the bank's CD service specific to the Austin MSA AA.

- **Economic Development** – An employee serves on the Board of a nonprofit public-private partnership for the city of Taylor that promotes economic development via workforce development, employment growth, business retention and expansion, as well as serving the needs and interests of the small business lending community.

## VICTORIA MSA AA – Full-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN VICTORIA MSA AA

The Victoria MSA AA includes all census tracts within Victoria and Goliad Counties located in the Victoria, TX MSA. The table below outlines the office locations in the Victoria MSA AA.

Office Location Victoria MSA AA				
County/City/Office	Office Type	Census Tract Number	Census Tract Income Level	Office Opened or Closed Since Last Evaluation
<b>Victoria County</b>				
Laurent Branch	Branch	0006.01	Moderate	No
Sam Houston Branch	Branch	0005.02	Moderate	No
<i>Source: Bank Data; 2015 ACS Data</i>				

### **Economic and Demographic Data**

The area’s 25 census tracts reflect the following income designations based on 2015 ACS Census data: one low-, eight moderate-, nine middle-, and six upper-income census tracts. Additionally, one tract does not contain an income designation.

The area includes 39,595 housing units. Of these, 60.2 percent are owner-occupied, 29.2 percent are occupied rental units, and 10.6 percent are vacant. The geographic distribution criterion considers the distribution of owner-occupied housing units.

Examiners used the 2020 FFIEC-updated median family income level to analyze home mortgage loans under the borrower profile criterion. The following table presents the low-, moderate-, middle- and upper-income categories, based on the 2020 FFIEC-updated median family income of \$68,800 for the Victoria, TX MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2020 (\$68,800)	<\$34,400	\$34,400 to <\$55,040	\$55,040 <\$82,560	≥\$82,560
<i>Source: FFIEC</i>				

The following table provides additional demographic and economic data for the assessment area.

Demographic Information of the Assessment Area Victoria MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	4.0	32.0	36.0	24.0	4.0
Population by Geography	97,509	3.4	32.2	31.2	33.1	0.0
Housing Units by Geography	39,595	3.1	31.0	32.6	33.3	0.0
Owner-Occupied Units by Geography	23,844	2.0	23.9	32.2	41.9	0.0
Occupied Rental Units by Geography	11,547	5.4	46.2	28.3	20.2	0.0
Vacant Units by Geography	4,204	3.2	29.8	46.7	20.2	0.0
Businesses by Geography	7,322	2.0	31.6	29.8	36.4	0.1
Farms by Geography	274	0.7	13.9	42.3	43.1	0.0
Family Distribution by Income Level	25,166	23.2	16.8	18.2	41.9	0.0
Household Distribution by Income Level	35,391	23.6	16.4	18.2	41.8	0.0
Median Family Income MSA - 47020 Victoria, TX MSA		\$60,302	Median Housing Value			\$117,687
			Median Gross Rent			\$786
			Families Below Poverty Level			12.4%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

According to 2021 D&B data, the Victoria MSA AA includes 7,322 businesses. The analysis of small business loans under the borrower profile criterion compared the distribution of businesses by GAR level. For businesses located in the Victoria MSA AA, approximately 82.2 percent reported GARs of \$1 million or less, 4.5 percent reported GARs of more than \$1 million, and 13.4 percent reported no GAR information.

Services represents the largest industry in the area at 38.9 percent of total employment followed by retail trade at 14.4 percent; non-classifiable establishments at 13.5 percent; and finance, insurance and real estate at 9.5 percent. Major employers reported in the assessment area include, Citizens Medical Center, DeTar Healthcare System, Invista, and Caterpillar. Additionally, due to several manufactures operating in nearby counties, many employees commute to those areas for work.

Unemployment rates as of May 2022 indicate a rate of 4.3 percent for Victoria and Goliad Counties compared to the State of Texas' unemployment rate of 3.8 percent and the national average of 3.4 percent.

### **Competition**

The assessment area reflects a moderate level of competition for financial services. According to the FDIC Market Share data as of June 30, 2021, 14 financial institutions operated 26 full-service offices in the area. Of these institutions, TTB ranked 6<sup>th</sup> in deposit market share, capturing 3.3 percent of the assessment area's deposits. Overall, the competition level allows for lending opportunities.



### **Community Contact**

Examiners interviewed a community member knowledgeable of the area's economic, demographic, and business environments to help assess the current economic conditions, community credit needs, and potential opportunities for bank involvement in the area. The contact represents an organization that promotes economic development in the assessment area. The contact stated that the area's economy is stable with many opportunities for commercial and residential development. The contact indicated that local financial institutions are responsive to the area's credit and community development needs. According to the contact, opportunities for financial institution participation include small business, small farm, and home mortgage loans.

### **Credit and Community Development Needs and Opportunities**

The Victoria MSA AA created varied loan demand for all types of loans. The area's economy also supports credit growth and opportunities for various loan types. Considering information obtained from the community contact, bank management, as well as demographic and economic information, examiners determined that the area's primary credit needs include small business and home mortgage lending.

With respect to the area's community development needs, examiners considered that over one-third, or 40.0 percent, of the area's families report either low or moderate incomes. These characteristics typically suggest a higher need for activities that aid in providing community services targeted to low- and moderate-income individuals. Other community development needs exist regarding activities that revitalize or stabilize qualifying geographies, as suggested by 36.0 percent of the area's census tracts receiving low- or moderate-income designations. Community development needs also exist regarding activities for economic development given that D&B shows 7,322 businesses in the assessment area with 82.2 percent of those businesses with GARs of \$1 million or less.

## **CONCLUSIONS ON PERFORMANCE CRITERIA IN VICTORIA MSA AA**

### **LENDING TEST**

TTB demonstrated a reasonable record regarding the Lending Test in the Victoria MSA AA. Reasonable geographic distribution and borrower profile performance to support this conclusion.

### **Geographic Distribution**

The geographic distribution of loans reflects reasonable dispersion throughout the Victoria MSA AA. Reasonable home mortgage and small business performance support this conclusion.

### ***Home Mortgage Loans***

The geographic distribution of home mortgage loans within the Victoria MSA AA reflects reasonable performance. Reasonable performance in low- and moderate-income census tracts supports this conclusion.

The following table shows that the bank did not lend in low-income areas; however, the aggregate performance shows only one percent of loans originated in these tracts. Therefore, the bank's level is reflective of reasonable performance. The table further shows that the bank's level of lending in moderate-income geographies exceeds aggregate data by 0.8 percentage points, also reflecting reasonable performance.

Geographic Distribution of Home Mortgage Loans Victoria MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	2.0	1.0	0	0.0	0	0.0
Moderate	23.9	19.2	4	20.0	370	10.0
Middle	32.2	27.9	2	10.0	310	8.4
Upper	41.9	51.9	14	70.0	3,010	81.6
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>3,690</b>	<b>100.0</b>
Source: 2015 ACS Data; 2020 HMDA Reported Data; 2020 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%						

### ***Small Business Loans***

The geographic distribution of small business loans in the Victoria MSA AA reflects reasonable performance. Reasonable records of small business lending within low- and moderate-income census tracts support this conclusion.

The following table shows that in low-income census tracts, the bank's level of lending exceeds D&B by 5.1 percentage points, reflecting reasonable performance. The table further shows that the bank's level of lending in moderate-income geographies exceeds D&B data by 0.5 percentage points, also reflective of reasonable performance.

Geographic Distribution of Small Business Loans Victoria MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	2.0	2	7.1	144	4.6
Moderate	31.6	9	32.1	712	22.8
Middle	29.8	10	35.7	1,527	49.0
Upper	36.4	7	25.0	736	23.6
Not Available	0.1	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>28</b>	<b>100.0</b>	<b>3,119</b>	<b>100.0</b>
Source: 2021 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%					

## **Borrower Profile**

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes in the Victoria MSA AA. Reasonable performance regarding home mortgage and small business lending supports this conclusion.

### ***Home Mortgage Loans***

The distribution of home mortgage loans to individuals of different income levels within the Victoria MSA AA reflects reasonable performance. Reasonable records of lending to low- and moderate-income borrowers supports this conclusion.

The following table shows that the bank's level of lending to low-income borrowers exceeds aggregate data by 2.2 percentage points, reflecting reasonable performance. The table further shows that the bank's level of lending to moderate-income borrowers trails aggregate data by 6.3 percentage points, also reflecting reasonable performance.

<b>Distribution of Home Mortgage Loans by Borrower Income Level Victoria MSA AA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	23.2	2.8	1	5.0	115	3.1
Moderate	16.8	11.3	1	5.0	85	2.3
Middle	18.2	19.4	1	5.0	125	3.4
Upper	41.9	41.1	12	60.0	2,840	77.0
Income Not Available	0.0	25.4	5	25.0	525	14.2
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>20</b>	<b>100.0</b>	<b>3,690</b>	<b>100.0</b>
<i>Source: 2015 ACS Data; 2020 HMDA Reported Data; 2020 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%</i>						

### ***Small Business Loans***

The borrower profile distribution of small business loans in the Victoria MSA AA reflects reasonable penetration among businesses of different sizes. A reasonable record regarding the bank's overall level of lending to businesses with GARs of \$1 million or less supports this conclusion.

The table below shows that the bank originated 82.2 percent of its small business loans to businesses with GARs of \$1 million or less, reflecting reasonable performance. The bank's level demonstrates consistent performance with the percent of businesses reporting GARs of \$1 million or less.

Distribution of Small Business Loans by Gross Annual Revenues Victoria MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
< \$100,000	53.1	7	25.0	304	9.7
\$100,000 - \$249,999	19.3	7	25.0	690	22.1
\$250,000 - \$499,999	6.2	5	17.9	259	8.3
\$500,000 - \$1,000,000	3.6	4	14.3	578	18.5
<b>Subtotal &lt;= \$1,000,000</b>	<b>82.2</b>	<b>23</b>	<b>82.2</b>	<b>1,831</b>	<b>58.6</b>
>\$1,000,000	4.5	2	7.1	900	28.9
Revenue Not Available	13.4	3	10.7	388	12.4
<b>Total</b>	<b>100.0</b>	<b>28</b>	<b>100.0</b>	<b>3,119</b>	<b>100.0</b>
<i>Source: 2021 D&amp;B Data, Bank Data</i> <i>Due to rounding, totals may not equal 100.0%</i>					

## COMMUNITY DEVELOPMENT TEST

The bank demonstrated an adequate record regarding the Community Development Test in the Victoria MSA AA. The institution's community development performance demonstrates adequate responsiveness to community development needs in its assessment area through CD loans, QIs, and CD services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment area.

### Community Development Loans

The bank exhibited an excellent record regarding its CD loans in the Victoria MSA AA. An excellent level regarding the dollar volume of CD loans primarily supports this conclusion.

As shown in the table below, TTB originated 32 CD loans totaling approximately \$5.2 million in the Victoria MSA AA. This level equates to 38.2 percent of the bank's overall excellent level of CD loans by dollar volume. As noted, this area accounted for 30.5 percent of the bank's lending volume; therefore, the current level reflects excellent performance. The loans benefited revitalization or stabilization efforts within the Victoria MSA AA, which demonstrates responsiveness to an identified community development need.

Community Development Lending Victoria MSA AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)	#	\$(000)
2019 (Partial)	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	32	5,152	32	5,152
2021	0	0	0	0	0	0	0	0	0	0
YTD 2022	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>32</b>	<b>5,152</b>	<b>32</b>	<b>5,152</b>
<i>Source: Bank Data</i>										

The following provides an example of the bank's community development lending in the Victoria MSA AA.

- **Revitalize or Stabilize** – The bank originated 32 PPP loans totaling \$5.2 million to support businesses located in low- and moderate-income areas of the Victoria MSA AA area during work stoppages resulting from the COVID-19 pandemic. The funds provided for job retention for low- and moderate-income workers.

### **Qualified Investments**

The institution displayed a very poor record regarding its QIs in the Victoria MSA AA. A very poor level regarding the dollar volume of QIs primarily supports this conclusion.

As shown in the below table, the bank made use of 14 qualified donations totaling \$15,000 in the Victoria MSA AA, reflective of very poor performance. The total dollar amount represents 0.06 percent of the bank's overall excellent level of QIs. As noted, this area contributed 27.3 percent of the bank's total deposits. While the current levels reflect very poor performance, examiners did not consider the bank to be simply ignoring this activity. Further, although limited, the QIs benefit community services for low- and moderate-income individuals within the Victoria MSA AA, which demonstrates some responsiveness to identified community development needs.

Qualified Investments Victoria MSA AA										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	0	0	0	0	0	0	0	0
2019 (Partial)	0	0	0	0	0	0	0	0	0	0
2020	0	0	0	0	0	0	0	0	0	0
2021	0	0	0	0	0	0	0	0	0	0
YTD 2022	0	0	0	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Qualified Grants & Donations	0	0	14	15	0	0	0	0	14	15
<b>Total</b>	<b>0</b>	<b>0</b>	<b>14</b>	<b>15</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>14</b>	<b>15</b>
<i>Source: Bank Data</i>										

The following provides an example of the bank's QI activity in the Victoria MSA AA.

- **Community Services** – The bank made two qualified donations totaling \$2,000 to a non-profit service organization within Victoria County that provides scholarships to economically disadvantaged youth to attend college.

### **Community Development Services**

The bank established an adequate record regarding its CD services in the Victoria MSA AA. Adequate performance regarding the level of services primarily supports this conclusion.

The following table shows the bank provided 18 CD services in the Victoria MSA AA. This number equates to an average of 2.9 CD services, per office, per year. The current level reflects adequate performance in the Victoria MSA AA. The table also shows that all of the CD services benefited community services, which demonstrates the bank's responsiveness to an identified community development need.

Community Development Services Victoria MSA AA					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2019 (Partial)	0	5	0	0	5
2020	0	4	0	0	4
2021	0	4	0	0	4
YTD 2022	0	5	0	0	5
<b>Total</b>	<b>0</b>	<b>18</b>	<b>0</b>	<b>0</b>	<b>18</b>
<i>Source: Bank Data</i>					

The following provides a notable example of the bank’s CD services specific to the Victoria MSA AA.

- **Community Services** – An employee serves as treasurer of a nonprofit organization within the city of Victoria located in a moderate-income tract. This organization provides programs to support low- and moderate-income homeless individuals.

In addition to the adequate number of services, the retail banking structure benefits low- and moderate-income individuals through its branch network. The bank currently operates two branches and ATMs in moderate-income census tracts within the Victoria MSA AA.

## NON-MSA AA-Limited-Scope Review

### DESCRIPTION OF INSTITUTION’S OPERATIONS IN NON-MSA AA

The Non-MSA AA consists of the entirety of Dewitt and Calhoun Counties in Southeast Texas. The Non-MSA AA includes five census tracts in Dewitt County and six tracts in Calhoun County. These census tracts reflect the following income designations according to the 2015 ACS Census data: two moderate-income, one middle-income, seven upper-income, and one tract without an income classification. Within this AA, TTB operates two full-service offices and ATMs in upper-income census tracts. The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Assessment Area Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	11	0.0	18.2	9.1	63.6	9.1
Population by Geography	42,206	0.0	23.7	8.8	67.5	0.0
Housing Units by Geography	20,787	0.0	17.5	16.1	66.4	0.0
Owner-Occupied Units by Geography	11,039	0.0	18.4	9.7	71.9	0.0
Occupied Rental Units by Geography	4,016	0.0	26.2	7.8	66.0	0.0
Vacant Units by Geography	5,732	0.0	9.8	34.3	55.9	0.0
Businesses by Geography	2,737	0.0	16.1	7.1	76.9	0.0
Farms by Geography	167	0.0	12.6	4.8	82.6	0.0
Family Distribution by Income Level	10,626	18.4	15.2	15.7	50.8	0.0
Household Distribution by Income Level	15,055	21.9	13.6	14.6	49.9	0.0
Median Family Income Non-MSAs - TX		\$52,198	Median Housing Value			\$106,081
			Median Gross Rent			\$716
			Families Below Poverty Level			13.7%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

D&B data reports 2,737 business operating in the assessment area. The service industry represents the largest industry in the area at 36.5 percent of total businesses followed by retail trade at 14.7 percent, non-classifiable establishments at 13.4 percent; and finance, insurance, and real estate at 8.2 percent. Major employers in Dewitt County include Cuero Regional Hospital, Cuero Independent School District, Texas Department of Criminal Justice, DeWitt County-government, HEB, and Walmart. For Calhoun County, major employers include Formosa Plastics, Calhoun County Independent School District, Alcoa, and Dow Chemical.

The Texas Workforce Commission noted that Dewitt and Calhoun Counties reported May 2022 unemployment rates of 3.1 percent and 3.5 percent, respectively, compared to the State of Texas' rate of 3.8 percent and the national rate of 3.4 percent for the same period.

## CONCLUSIONS ON PERFORMANCE CRITERIA IN NON-MSA AA

### LENDING TEST

The institution's lending performance in the Non-MSA AA is consistent with the institution's lending performance overall.

### Geographic Profile

#### *Small Business Loans*

Geographic Distribution of Small Business Loans Non-MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	0.0	0	0.0	0	0.0
Moderate	16.1	3	17.6	750	26.9
Middle	7.1	0	0.0	0	0.0
Upper	76.9	14	82.4	2,042	73.1
Not Available	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>17</b>	<b>100.0</b>	<b>2,792</b>	<b>100.0</b>
Source: 2021 D&B Data; Bank Data Due to rounding, totals may not equal 100.0%					



## **Borrower Profile**

### ***Small Business Loans***

<b>Detailed Distribution of Small Business Loans by Gross Annual Revenues Non-MSA AA</b>					
<b>Gross Revenue Level</b>	<b>% of Businesses</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
< \$100,000	51.2	5	29.4	268	9.6
\$100,000 - \$249,999	21.1	5	29.4	508	18.2
\$250,000 - \$499,999	6.0	2	11.8	234	8.4
\$500,000 - \$1,000,000	2.8	2	11.8	932	33.4
<b>Subtotal &lt;= \$1,000,000</b>	<b>81.1</b>	<b>14</b>	<b>82.0</b>	<b>1,942</b>	<b>70.0</b>
>\$1,000,000	4.9	3	17.6	850	30.4
Revenue Not Available	14.1	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>17</b>	<b>100.0</b>	<b>2,792</b>	<b>100.0</b>
<i>Source: 2021 D&amp;B Data, Bank Data Due to rounding, totals may not equal 100.0%</i>					

## **COMMUNITY DEVELOPMENT TEST**

The institution's community development performance in the Non-MSA AA exceeds the community development performance for institution as a whole; however, it does not change the institution rating.

## **SAN ANTONIO MSA AA-Limited-Scope Review**

### **DESCRIPTION OF INSTITUTION'S OPERATIONS IN SAN ANTONIO MSA AA**

The San Antonio MSA AA consists of the entirety of Guadalupe and Comal Counties in the San Antonio-New Braunfels MSA. Within this AA, TTB operates one full-service office and ATM in a middle-income census tract.

The assessment area includes 53 census tracts: 29 census tracts in Guadalupe and 24 tracts in Comal County. These census tracts reflect the following income designations according to the 2015 ACS Census data: one low-income, six moderate-income, 21 middle-income, and 25 upper-income. The following table illustrates select demographic characteristics of the assessment area.

Demographic Information of the Assessment Area San Antonio MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	53	1.9	11.3	39.6	47.2	0.0
Population by Geography	263,092	2.4	10.4	33.2	54.0	0.0
Housing Units by Geography	103,389	2.1	9.7	36.9	51.3	0.0
Owner-Occupied Units by Geography	70,953	1.2	7.4	32.8	58.6	0.0
Occupied Rental Units by Geography	21,938	4.8	16.0	43.8	35.4	0.0
Vacant Units by Geography	10,498	2.9	12.4	49.7	35.0	0.0
Businesses by Geography	27,480	2.0	7.0	33.2	57.8	0.0
Farms by Geography	1,002	1.2	4.7	34.6	59.5	0.0
Family Distribution by Income Level	69,661	15.1	15.5	19.0	50.5	0.0
Household Distribution by Income Level	92,891	17.7	14.1	17.6	50.6	0.0
Median Family Income MSA - 41700 San Antonio-New Braunfels, TX MSA		\$62,228	Median Housing Value			\$177,451
			Median Gross Rent			\$962
			Families Below Poverty Level			7.1%
Source: 2015 ACS and 2021 D&B Data Due to rounding, totals may not equal 100.0% (* ) The NA category consists of geographies that have not been assigned an income classification.						

Examiners used the 2020 FFIEC-updated median family income level to analyze home mortgage loans under the borrower profile criterion. The following table presents the low-, moderate-, middle- and upper-income categories, based on the 2020 FFIEC-updated median family income of \$72,200 for the San Antonio, TX MSA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
2020 (\$72,200)	<\$36,100	\$36,100 to <\$57,760	\$57,760 to <\$86,640	≥\$86,640
Source: FFIEC				

## CONCLUSIONS ON PERFORMANCE CRITERIA IN SAN ANTONIO MSA AA

### LENDING TEST

The institution's lending performance in the San Antonio MSA AA is consistent with the institution's lending performance overall.

## **Geographic Profile**

### ***Home Mortgage Loans***

<b>Geographic Distribution of Home Mortgage Loans San Antonio MSA AA</b>						
<b>Tract Income Level</b>	<b>% of Owner-Occupied Housing Units</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	1.2	0.4	0	0.0	0	0.0
Moderate	7.4	3.5	1	12.5	175	9.3
Middle	32.8	25.1	2	25.0	450	23.9
Upper	58.6	71.0	5	62.5	1,255	66.8
Not Available	0.0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>1,880</b>	<b>100.0</b>
<i>Source: 2015 ACS; 2020 HMDA Reported Data; 2020 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%</i>						

## **Borrower Profile**

### ***Home Mortgage Loans***

<b>Distribution of Home Mortgage Loans by Borrower Income Level San Antonio MSA AA</b>						
<b>Borrower Income Level</b>	<b>% of Families</b>	<b>Aggregate Performance % of #</b>	<b>#</b>	<b>%</b>	<b>\$(000s)</b>	<b>%</b>
Low	15.1	1.3	1	12.5	155	8.2
Moderate	15.5	8.4	0	0.0	0	0.0
Middle	19.0	17.6	1	12.5	215	11.4
Upper	50.5	42.9	6	75.0	1,510	80.3
Not Available	0.0	29.8	0	0.0	0	0.0
<b>Total</b>	<b>100.0</b>	<b>100.0</b>	<b>8</b>	<b>100.0</b>	<b>1,880</b>	<b>100.0</b>
<i>Source: 2015 ACS; 2020 HMDA Reported Data; 2020 HMDA Aggregate Data Due to rounding, totals may not equal 100.0%</i>						

## **COMMUNITY DEVELOPMENT TEST**

The institution's community development performance in the San Antonio MSA AA is below the institution's community development performance for the institution as a whole; however, it does not change the institution rating.

## **APPENDICES**

### **INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA**

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

#### **Community Development Test**

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

## GLOSSARY

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

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
  - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

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

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

**Multi-family:** Refers to a residential structure that contains five or more units.



**Nonmetropolitan Area** (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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

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

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

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

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

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

# TrustTexas Bank, SSB

## Bank's Branches

### ***§345.43 Content and Availability of Public File***

The regulation pertaining to CRA requires the Bank to maintain these files and make them available to the public. Per regulation:

*(3) A list of the bank's branches, their street addresses, and geographies*

**BRANCHES OF  
TrustTexas Bank, SSB**

Branch: **Cuero**

Location: **121 E. Courthouse Street**

Census Tract: **9703.00**

MSA/MD Code: **NA**

Marketing Description: **This area is comprised of small businesses, the county courthouse, residential areas and a rural hospital. The population of the community in the 2010 Census was 6841. The office was opened in 1921, and the Cuero location was recently renovated in 2002. An ATM is onsite.**

Branch: **Yorktown**

Location: **225 E. Main Street**

Census Tract: **9705.00**

MSA/MD Code: **NA**

Marketing Description: **The branch was opened in November, 1974, for the convenience of the Southwestern part of DeWitt County. The market area is rural and comprised of small businesses, residential, rural residential, farms, and ranches. The population of the community in the 2010 Census was 2092. An ATM is onsite.**

Branch: **Victoria – Laurent**

Location: **2109 N. Laurent – Corner of Laurent and Red River**

Census Tract: **6.01**

MSA/MD Code: **47020**

Market Description: **This area is comprised of small businesses, some larger chains, heavy residential, very little raw/undeveloped land. Opened in November, 1975, Victoria is a SMSA. Census tract data is available. The office was opened to make it more convenient for customers in Victoria County who had been served out of our main office. An ATM is onsite.**

Branch: **Victoria – Sam Houston**

Location: **2701 Sam Houston Drive – corner of Sam Houston and Mockingbird**

Census Tract: **5.02**

MSA/MD Code: **47020**

Marketing Description: **This area is comprised of small businesses, some larger chains, banks, a post office, residential and very little raw/undeveloped land. The office was opened in March, 1995, to make it more convenient to our customers in Victoria County. Census tract data is available. An ATM is onsite.**

Branch: **Kyle, TX**

Location: **4625 Ratcliffe Drive**

Census Tract: **109.09**

MSA/MD Code: **12420**

Marketing Description: **Kyle is comprised of large businesses, large manufacturing plants, larger chain stores, large hotels, banks, and heavy residential growth. The office was opened in December 2009. Census tract data is available. An ATM is onsite.**

Branch: **New Braunfels, TX**

Location: **2085 Central Plaza**

Census Tract: **3105.02**

MSA/MD Code: **41700**

Marketing Description: **This area is comprised of large businesses, the Comal County courthouse, recreation and tourism, larger chain stores, large hotels, banks, medical profession, and heavy residential growth. The office was opened in June 2014. New Braunfels is located in Comal and Guadalupe counties. Census tract data is available. An ATM is onsite.**

# TrustTexas Bank, SSB

## Opened and Closed Branches

### ***§345.43 Content and Availability of Public File***

The regulation pertaining to CRA requires the Bank to maintain these files and make them available to the public. Per regulation:

*(4) "A list of branches opened or closed by the bank during the current year and each of the prior two calendar years, their street addresses and geographies."*

### ***2022***

TrustTexas Bank did not open or close any branches.

### ***2023***

TrustTexas Bank closed a Loan Production Office in Hutto, Texas on June 30, 2023. The LPO was located at 531 Ed Schmidt Blvd, Suite 110, Hutto, Texas 78634 and was in Williamson County MSA 12420.

### ***2024***

TrustTexas Bank has not opened or closed any branches during the first quarter of 2024.

# TrustTexas Bank, SSB

## List of Services

### ***§345.43 Content and Availability of Public File***

The regulation pertaining to CRA requires the Bank to maintain these files and make them available to the public. Per regulation:

*(5) A list of services (including hours of operation, available loan and deposit products, and transaction fees) generally offered at the bank's branches and descriptions of material differences in the availability or cost of services at particular branches, if any. At its option, a bank may include information regarding the availability of alternative systems for delivering retail banking services (e.g., RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs)*

Current Product and Services (deposit and loan)

Locations and Lobby Hours

Transaction Fees

## **TrustTexas Bank**

### **Current Product and Services**

**Every new personal checking account includes:** Free debit card, free online banking, free bill pay, free mobile banking with mobile deposit, free images with monthly statements, and unlimited transactions.

#### **NON-INTEREST BEARING**

##### **Always Free Checking Account**

A FREE account for anyone!

- Minimum deposit to open: \$50.00
- No minimum balance
- No monthly service charge
- Monthly statement cycle
- Overdraft protection from another account available
- New consumer checking accounts will receive \$100 Introductory Overdraft Privilege limit at account opening that will be increased to \$500 after thirty (30) days in good standing
- First box of standard checks free

##### **Always Free Business Checking Account**

Perfect for most businesses!

- Minimum deposit to open: \$50.00
- No monthly service charge
- 1000 free monthly transaction items. Transaction items include all debits and credits. If the Always Free Business Checking account exceeds 1,000 free monthly transactions, the account may be converted to a Commercial Checking.
- No excess Item Fee
- Free coin/currency deposits
- Unlimited coin/currency deposits
- Overdraft protection from another account available
- Overdraft Privilege limit of up to \$500 available on eligible accounts
- Electronic images free with e-Statements

##### **Commercial Checking Account**

For business with more complex banking needs!

- Minimum deposit to open: \$50.00
- Service charge of \$15.00 per month
- Monthly transaction items are .15 each regardless of type. Transaction items include all debits and credits.
- Coin and currency deposits \$0.50 per \$1,000 per month
- Monthly itemized Account Analysis Statements
- Overdraft protection from another account available
- Overdraft Privilege limit of up to \$500 available on eligible accounts
- Electronic images free with e-Statements

Account subject to Account Analysis Fees based on account activity, average collected balances and earnings rate factors.

Please see the Commercial Fee Schedule for the analyzed cost of commercial transactions and services.

#### **INTEREST BEARING ACCOUNTS**

##### **Star Savings Account**

An interest-bearing savings account for everyone!

- Minimum deposit to open: \$50.00
- Minimum daily balance to avoid a service charge: \$100.00
- Monthly service charge if balance falls below minimum: \$8.00
- Minimum daily balance to earn interest: \$100.00
- All withdrawals/debits, regardless of type, in excess of three per calendar month are subject to an excess debit fee of \$1.00 each.
- Quarterly or monthly statement cycle, as required by regulations.



**Business Savings Account**

Build a nest egg and earn interest for your business!

- Minimum deposit to open: \$50.00
- Minimum daily balance to avoid a service charge: \$1,500.00
- Service charge per month on daily balances below \$1,500.00: \$10.00
- No minimum daily balance required to earn interest
- All withdrawals/debits, regardless of type, in excess of three per calendar month are subject to an excess debit fee of \$1.00 each.
- Quarterly or monthly statement cycle, as required by regulations.

**Smart Interest Checking Account**

Earn interest with the convenience of direct deposit or any automatic payment!

- Any ACH, incoming or outgoing (i.e., direct deposit, or automatic payment)
- Minimum deposit to open: \$50.00
- No minimum balance
- No monthly service charge
- No minimum daily balance required to earn interest
- Monthly statement cycle
- Overdraft protection from another account available
- New consumer checking accounts will receive \$100 Introductory Overdraft Privilege limit at account opening that will be increased to \$500 after thirty (30) days in good standing
- First standard checks free

**Performance Interest Checking Account**

An account for those interested in higher interest!

- Minimum deposit to open: \$50.00
- Minimum daily balance to avoid a service charge: \$1,500.00
- Service charge per month on daily balances below \$1,500.00: \$10.00
- No minimum daily balance required to earn interest
- Monthly statement cycle
- Overdraft protection from another account available
- New consumer checking accounts will receive \$100 Introductory Overdraft Privilege limit at account opening that will be increased to \$500 after thirty (30) days in good standing
- One box of standard checks free annually

**50+ Interest Checking Account**

A perfect account for customers 50 and better!

- Minimum deposit to open: \$50.00
- No minimum balance
- No monthly service charge
- No minimum daily balance required to earn interest
- Monthly statement cycle
- Overdraft protection from another account available
- New consumer checking accounts will receive \$100 Introductory Overdraft Privilege limit at account opening that will be increased to \$500 after thirty (30) days in good standing
- First box of standard checks free

**Business Interest Checking Account**

Designed for sole proprietorships and not-for-profits!

- Minimum deposit to open: \$50.00
- Minimum daily balance to avoid service charge: \$1,500.00
- Service charge per month on daily balances below \$1,500.00: \$10.00
- No minimum daily balance required to earn interest
- 1000 free monthly transaction items. Transaction items include all debits and credits. If the Business Interest Checking Account exceeds 1,000 free monthly transactions, the account may be converted to a Commercial Checking.
- No excess Item Fee
- Free coin/currency deposits
- Unlimited coin/currency deposits
- Overdraft protection from another account available
- Overdraft Privilege limit of up to \$500 available on eligible accounts
- Electronic images free with e-Statements

### **Money Market Account (MMA)**

Earn more interest and get more features!

- Minimum deposit to open: \$50.00
- Minimum daily balance to avoid a service charge: \$1,500.00
- Service charge per month on daily balances below \$1,500.00: \$10.00
- No minimum daily balance required to earn interest
- Transfers from a MMA to another account or to third parties by preauthorized, automatic, telephone, Internet, Phone Bank, ACH debit, wire transfers, point of sale (POS), check draft or similar order are limited to six per statement cycle.
- An excess debit fee of \$10.00 per item will be charged when these limits are exceeded.
- Monthly statement cycle
- Overdraft protection from another account available

### **Business Money Market Account (MMA)**

Earn more interest and get more features!

- Minimum deposit to open: \$50.00
- Minimum daily balance to avoid a service charge: \$1,500.00
- Service charge per month on daily balances below \$1,500.00: \$10.00
- No minimum daily balance required to earn interest
- Transfers from a MMA to another account or to third parties by preauthorized, automatic, telephone, Internet, Phone Bank, ACH debit, wire transfers, point of sale (POS), check draft or similar order are limited to six per statement cycle.
- An excess debit fee of \$10.00 per item will be charged when these limits are exceeded.
- Monthly statement cycle
- Overdraft protection from another account available
- Electronic images free with e-Statements

### **Certificates of Deposit Accounts**

Certificate of deposit accounts (CDs) are our most popular investment accounts. CDs offer a variety of fixed maturity periods with attractive interest rates.

Features that are common to all TrustTexas Bank CDs include the following:

- You may open any Regular CD with a minimum balance of \$1,000.00
- You may open any Jumbo CD with a minimum balance of \$100,000.00
- Because the rate you earn is based on the length of time your funds remain on deposit, additions to CD accounts after opening are not permitted.
- Interest begins to accrue on your funds on the business day that you deposit non-cash items (for example, checks) into a certificate account.
- We use the daily balance method to calculate the interest on your account. This method applies a daily periodic rate to the principal in the account each day.
- You may make withdrawals of principal from your account before maturity only if we agree at the time, you request the withdrawal. Principal withdrawn before maturity is included in the amount subject to early withdrawal penalty.
- You can only withdraw interest credited in the term, before maturity of that term, without penalty. You can withdraw interest any time during the current term after it is credited to your account.
- There are certain circumstances, such as the death or incompetence of an owner, where we will waive early withdrawal penalties.
- If you close your account before interest is credited, you will receive the accrued interest.
- There are several other specific terms within a certificate of deposit agreement that may vary based on the maturity selected and/or the amount of money invested. Examples of terms that may vary include the compounding frequency, the interest crediting frequency, the conditions under which early withdrawals of principal or interest may be made and options for the automatic renewal of the account, etc. If you have any questions, please contact a Customer Service Representative for more information.

### **IRA Savings Accounts**

Interest bearing account designed for your retirement savings.

- Minimum deposit to open: \$100.00
- Minimum average daily balance to avoid a service charge fee: \$100.00
- Service charge per month on average daily balances below \$100.00: \$5.00
- Minimum daily balance to earn interest: \$100.00
- An excess debit fee of \$5.00 is charged for each withdrawal in excess of one per calendar month.
- Quarterly or monthly statement cycle, as required by regulations.

**\*\*\* Lending services not available at Victoria-Laurent or Yorktown Branches\*\*\***

### **Mortgage Loans**

- At TrustTexas Bank, we want to make the financing of your home the easiest aspect of your purchase. Our Bank takes pride in providing the personal service and attention our customers deserve. An important part of this process is helping you select the home financing package that is right for you. To meet this need, we offer several affordable, flexible loan programs. Fixed Rate Mortgages offer the security of knowing what your mortgage payment will be over the term of the loan. To determine which financing choice is right for you please browse through our site and then feel free to contact a TrustTexas Bank Loan Officer to answer any questions and help you through the application process. To aid you in your home shopping, your Loan Officer will also be glad to help you Pre-qualify for a mortgage loan.
- Pre-qualifications are a simple and easy way to determine if you qualify for a specific home purchase or if you want to know what home loan amount you can qualify for. The pre-qualification process is fast and is provided for you at absolutely no cost. Documentation required for a pre-qualification is as follows:
  - A Completed Loan Application
  - Pay-stubs Covering a 30 Day period
  - Bank Statements covering a 3 Month Period
  - 2 Years of Tax Returns
- Following is a summary list of various documentation required to complete the loan approval process. Other documentation may be required given a borrower's specific situation, i.e., self-employed borrower's may be requested to provide additional financial information on the corporation/company.

#### Residential Loan Application

- Completed Loan Application with Signatures
- Copy of Sales Contract (If Purchase Money)
- Income Information
- Pay Stubs for the Most Recent 30-day Period
- IRS W-2 Forms or Tax Returns for the Previous Two Years
- Deposit Information
- Bank Statements Covering the Most Recent 3 Month Period
- Major Deposit/Investment Account Information
- Miscellaneous Information
- Divorce Decree (If Applicable)
- Verification of Child Support or
- Any Additional Income - if disclosed and is needed to qualify for a specific loan amount.

#### **Home Improvement Loans**

- Don't put off those needed home improvements that will make your property more functional or enjoyable. TrustTexas Bank has flexible financing that is easy on your budget.  
Whether you want to add on an extra room, remodel your kitchen or bathrooms, or make some needed repairs, TrustTexas Bank can help make it happen with a convenient, low-cost home improvement loan. Special features of a TrustTexas Bank home improvement loan include:
  - Low Closing Costs
  - Competitive Interest Rates
  - Terms Up To 30 Years
  - Fast Approval and Closing Timeframes

#### **Home Equity Loans**

- You may also take advantage of the equity you have built up in your home. TrustTexas Bank offers equity loans where the loan proceeds may be used for almost any purpose. The application process is easy and cost efficient. Home equity loans allow the homeowners the option to use the equity in their homes. Home equity loans can be first or second liens and the proceeds can be used for almost any purpose; debt consolidation, vehicle purchase and improvements. Approval is fast and closing costs are low. Some of the features are as follows:
  - Competitive Interest Rates
  - Low Closing Costs
  - Terms Up To 30 Years

#### **Consumer Loans**

- Whatever your consumer loan needs may be, TrustTexas Bank has an easy, low-cost loan program designed with our customer in mind. Our simple interest loans have no application fees, no credit report fees, and no prepayment penalties. Terms and rates can be designed to fit your financing needs for any of the following: a new or used car, a boat, RV, motorcycle, or vacation.

#### **Auto Loans**

- TrustTexas Bank offers competitive rates with terms up to 72 months. Pre-approved financing can be arranged before you visit your dealer's showroom. You may finance up to 90%, (Less TT&L), of the purchase price on new cars or up to the average loan amount on used cars. TrustTexas Bank can also assist you with other installment loans.  
Here are just some of the benefits of getting your consumer loan through TrustTexas Bank:  
Pre-approval of your car loan

### Other Installment Loans

- TrustTexas Bank can help you with almost any large purchase, from appliances and other necessities to those expensive toys that make life more enjoyable, like that new travel trailer you've been admiring. TrustTexas Bank can normally provide same day financing on installment loans for many of your large purchase items such as boats, camper trailers, RV'S, motorcycles or even that dream vacation you've been planning. Terms and rates can be matched to your specific financing needs.

### Personal Lines of Credit

- Write yourself a loan any time you need it with TrustTexas Bank's Cash Flow Reserve overdraft protection and Cash Flow Advantage personal line of credit. With TrustTexas Bank's Cash Flow products you can get the credit you deserve. Our account is a larger line of credit with a lower interest rate than you'll get on most credit cards or other unsecured loans. It's as easy to use as writing a check and you can use these funds for almost any reason.

Here are just some of the benefits of the Cash Flow Advantage or Cash Flow Reserve accounts:

- Line of Credit Up To \$10,000
- No Maintenance Fee
- No Transaction Fees
- Competitive Interest Rate
- Low Monthly Payments
- Easy Application and Fast Approval

### Business Loans

- TrustTexas Bank provides financing for almost any business need. Whether you own a small sole proprietorship or operate a growing corporation, our flexibility and fast approval process provide you with the financial support you deserve. TrustTexas Bank has incorporated our personal, one-on-one banking philosophy into the commercial lending area. Here are some of the commercial loan products available to our customers:

- Financing to Purchase Real Estate
- Financing for Equipment and/or Machinery
- Accounts Receivable Financing
- Inventory Financing
- Loans to Purchase Livestock
- Loans Secured by Marketable Securities
- Commercial Lines of Credit
- Loans to Finance Agricultural Production

Underwriting requirements, equity considerations and loan terms will vary based on the commercial loan product and the borrower relationship.

### Misc. Products:

Night Depository

ATM / Debit Cards

Safe Deposit Boxes

Savings Bonds Redemption

Notary Service

Money Orders

Cashier's Checks

Statement Savings

Certificates of Deposit

IRA's

Phone Bank

Online Banking

Transfer Now

Mobile Banking

Mobile Deposit Capture

Zelle

Merchant Deposit Capture

ACH Origination

E-Statements

Merchant Services

Bill Pay

Credit Card Sponsor

Consumer Gift Cards

CardHub

Text Banking

Chat Bot

Overdraft Privilege Program

Alerts

Digital Wallet

Online Account Opening

# TrustTexas Bank, SSB

## Locations and Lobby Hours

### ***Cuero Branch and Corporate Offices***

121 East Courthouse St.

P. O. Box 808

Cuero, TX 77954

361-275-2345

#### **Lobby Hours:**

Monday – Friday: 9:00 AM – 4:00 PM

#### **Drive Thru Hours:**

Monday – Friday: 8:00AM – 5:00 PM

Saturday: 9:00 AM – 12:00 PM

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### ***Kyle Branch***

4625 Ratcliffe Drive

Kyle, TX 78640

512-268-3732

#### **Lobby Hours:**

Monday – Friday: 9:00 AM – 4:00 PM

#### **Drive Thru Hours:**

Monday – Friday: 8:00 AM – 5:00 PM

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### ***New Braunfels Branch***

2085 Central Plaza

New Braunfels, TX 78130

830-626-3712

#### **Lobby Hours:**

Monday – Friday: 9:00 AM – 4:00 PM

#### **Drive Thru Hours:**

Monday – Friday: 8:00 AM – 5:00 PM

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***Victoria – Laurent Branch***

2109 N. Laurent

Victoria, TX 77901-5450

361-575-0584

**Lobby Hours:**

Monday – Friday: 9:00 AM – 4:00 PM

**Drive Thru Hours:**

Monday – Friday: 8:00 AM – 5:00 PM

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***Victoria – Sam Houston Branch***

2701 Sam Houston Dr.

Victoria, TX 77904-2341

361-572-9900

**Lobby Hours:**

Monday – Friday: 9:00 AM – 4:00 PM

**Drive Thru Hours:**

Monday – Friday: 8:00 AM – 5:00 PM

Saturday: 9:00 AM – 12:00 PM

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***Yorktown Branch***

225 East main

P. O. Box 806

Yorktown, TX 78164

361-564-2238

**Lobby Hours:**

Monday – Friday: 9:00 AM – 4:00 PM

**Drive Thru Hours:**

Monday – Friday: 8:00 AM – 5:00 PM



## Notice of Change to Fee Schedule Effective January 29, 2024

### TrustTexas Bank, ssb COMMERCIAL FEE SCHEDULE

Effective January 29, 2024

#### ANALYZED FEES

The following commercial checking account transactions and services are subject to account analysis based on the activity in the account, average collected balances, and earnings rate factors.

#### Cost of Commercial Transactions and Services:

Debits (or Checks) per item	0.15
On-Us Items Deposited per item	0.07
Transit Items Deposited per item	0.11
Outgoing currency per strap	0.25
Outgoing coin per roll	0.15
Serial sorting per item (\$8.00 min. per sort)	0.03
Special cutoff statement	3.00
Incoming ACH Debits/Credits	0.10
Deposit Corrections	5.00
Reserve Requirement	10%

Negative collected balance - Prime Rate adjusted first of month

Earnings Rate - 90 day T-bill Rate adjusted first of month

#### Merchant Deposit Capture Fees

Merchant Capture Maintenance Fee	15.00 (monthly)
Initial Token Fee	Free (1)
Additional Token Fee	5.00 per token
Replacement Token Fee	5.00 per token
Per Item Fee	See Analyzed Fees
Cancellation Fee	250.00 within first 6 months

#### ACH Origination Fees

ACH File Transfer (XFER) Fee	2.00 per file
Maximum Monthly Fee	16.00

#### Cannabis - Related Banking

Cannabis - Related Banking Maintenance Fee	30.00
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\* See Fee Schedule for additional standard account fees.



## Notice of Change to Fee Schedule Effective January 29, 2024

### TrustTexas Bank, ssb FEE SCHEDULE

Effective January 29, 2024

Account Closing Fee (for accounts closed within first 90 days)	\$ 15.00
Account Reconciliation Fee (one hour minimum)	\$ 25.00/hr
Amortization Schedule Fee	\$ 5.00 each
Bag Fee	
Zipper Bag	\$ 5.00 each
Locked Bag	\$ 15.00 each
Cashiers Checks Fee	
Customer	\$ 5.00 each
Non-customer*	\$ 10.00 each
Chargeback Fee	\$ 10.00 each
Check Cashing Fee for Non-Customers (Assessed on checks \$100 and more)	1%
Collection Items Fee	
Outgoing Collection (drafts)	\$ 15.00 each
Incoming Collection (drafts)	\$ 15.00 each
Copier Usage Fee	\$ 0.50/page
Currency Fee	
Per Outgoing Roll	\$ 0.15
Per Outgoing Strap	\$ 0.25
Debit Card Fees:	
Debit Card Replacement Fee	\$ 5.00
Foreign ATM Transaction Fee	\$ 1.50 each
International Service Assessment Fee	1% of transaction
Deposit Error Correction Fee	\$ 5.00
Deposit Verification Fee (Mortgage Loans)	\$ 10.00
Fax Fee - (minimum \$5.00)	\$ 1.00/page
Gift Card Fee	\$ 2.50
Levy, Lien, Garnishment, Freeze Fee	\$ 75.00
Imaged Item Fee**	\$ 3.00/month
Overdraft and Returned Item Fees:	
Overdraft Fee (Overdraft Fee applies to overdrafts created by check, in-person withdrawal, ATM withdrawal, or other electronic means, as applicable.)	\$ 29.00
Returned Item Fee	\$ 29.00





Personal Money Orders Fee	
Customer	\$ 3.00
Non-customer*	\$ 10.00
Photocopy Fee	\$ 2.00/page
(includes 1098/1099 duplicates - IRS Forms)	
Post-dated Check Fee (Computer watch)	\$ 5.00 each
Research Fee (One hour minimum)	\$ 25.00 hour
Signature Verification Fee	
(multiple signatures required)	\$ 10.00 month
Statement Printout Fee	\$ 3.00
Stop Payment Fee	\$ 29.00
Telephone Transfer Fee	\$ 3.00
Temporary Check Fee	\$ 0.25 each
Wire Transfer Fee - Incoming	
Customer	\$ 5.00
Non-customer*	\$ 25.00
Wire Transfer Fee - Outgoing	
Customer-	
Domestic	\$ 20.00 each
International	\$ 25.00
Non-customer*	
Domestic	\$ 25.00 each
International	\$ 35.00

Safe Deposit Box Rentals - see Safe Deposit Box Rental Fee Schedule

Safe Deposit Box Drilling Fee	\$250.00
Replacement Key	\$5.00
Key Deposit	\$10.00

For lost keys or keys not returned, the key deposit will be forfeited.

\*Officer Approval Required

\*\*For business accounts, check Images free with e-statements.

# TrustTexas Bank, SSB

## Assessment Area Maps

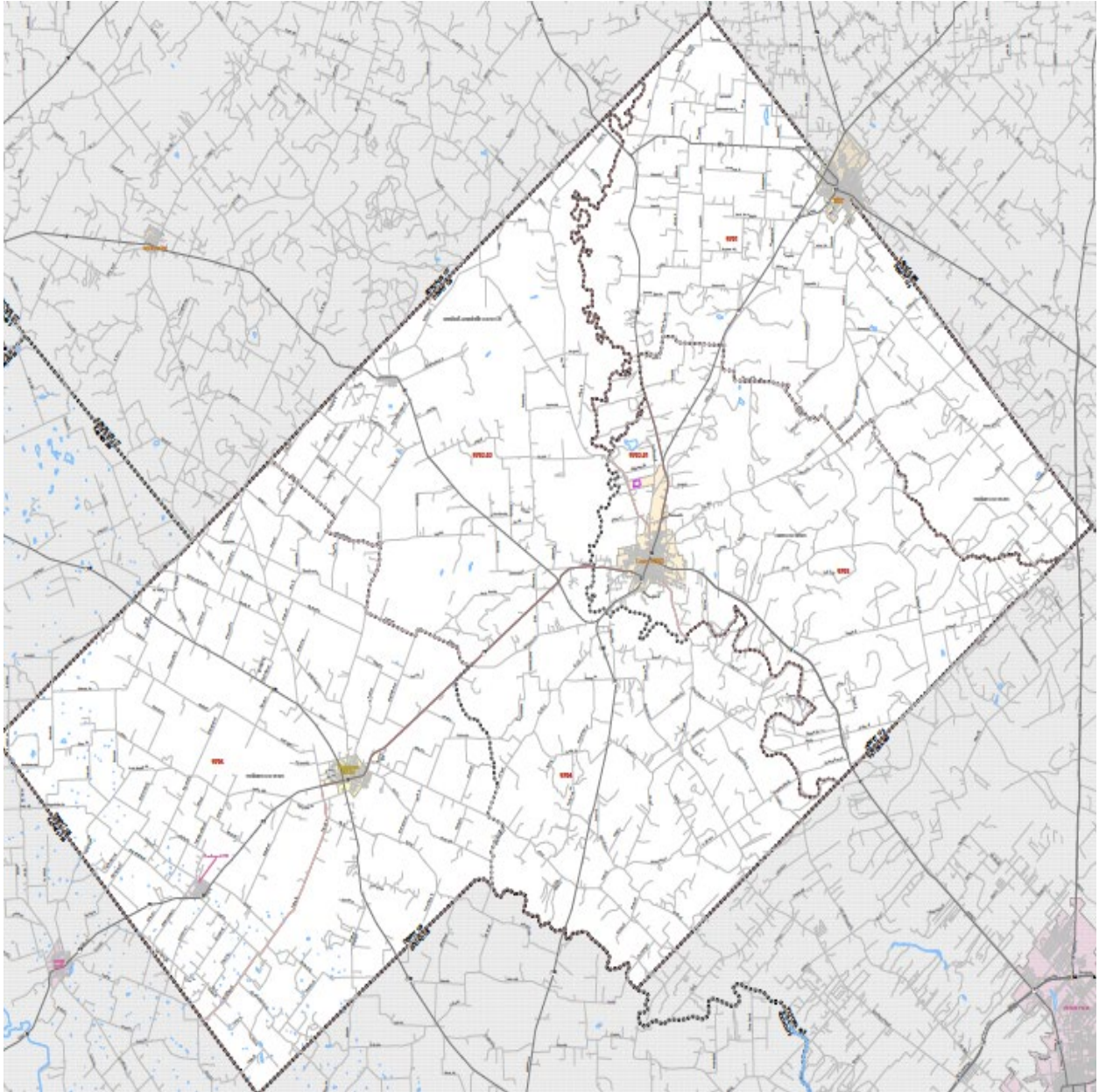
### ***§345.43 Content and Availability of Public File***

The regulation pertaining to CRA requires the Bank to maintain these files and make them available to the public. Per regulation:

*(6) A map of each assessment area showing the boundaries of the area and identifying the geographies contained within the area, either on the map or in a separate list.*

The actual Facility-based Assessment Area (fka: CRA Assessment Area) for Fair Lending will be DeWitt County, the entire Victoria, Texas MSA 47020, Calhoun County, the counties of Hays and Travis in the Austin, Texas MSA 12420, and the counties of Comal and Guadalupe which are included in the San Antonio, Texas MSA 41700.

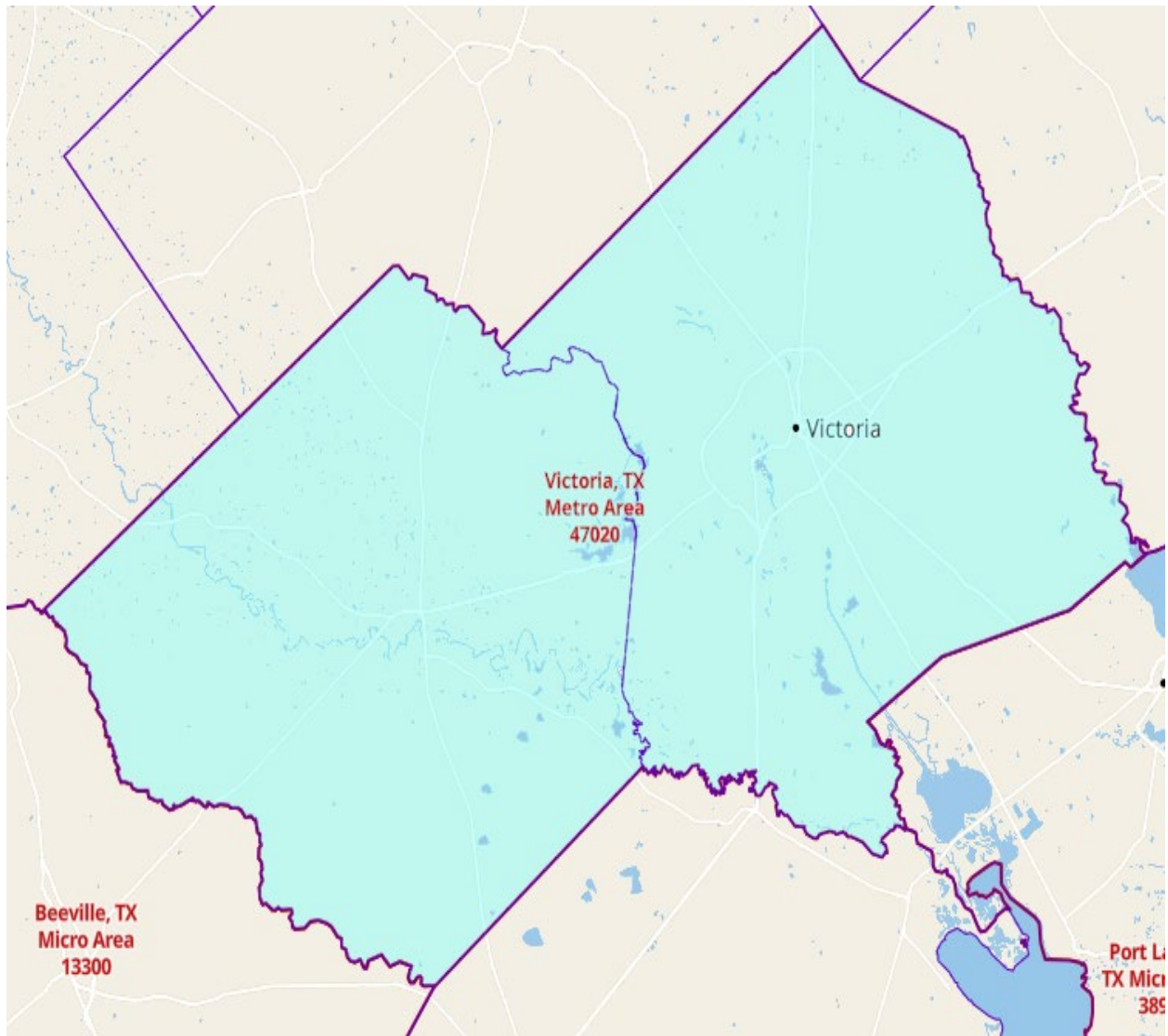
## **DeWitt County**



### **Dewitt County**

9701.00  
9702.01  
9702.02  
9703.00  
9704.00  
9705.00  
9999.99

## **Victoria, TX MSA**

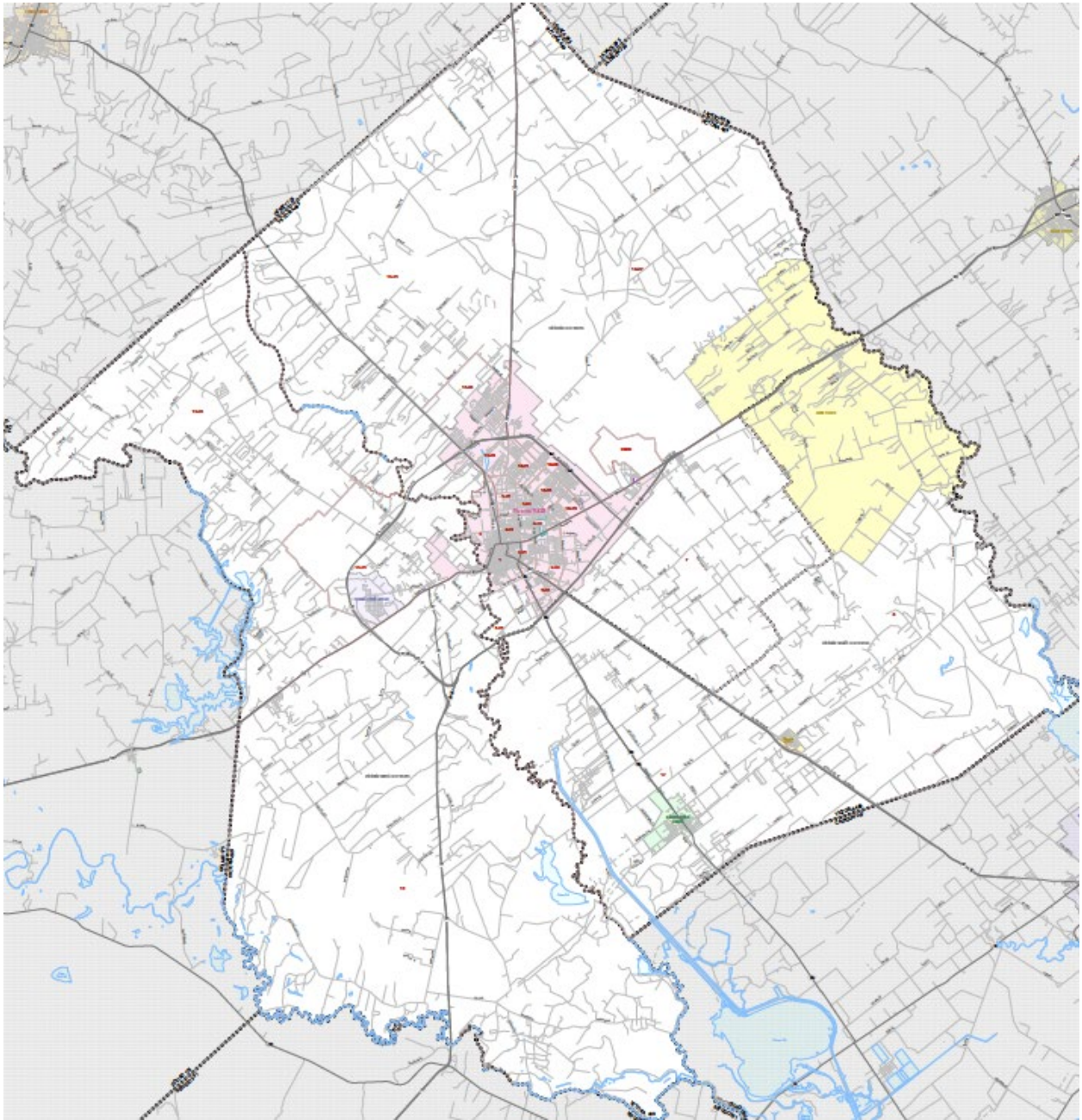


**Victoria, TX MSA – 47020**

*175-Goliad, 469-Victoria*



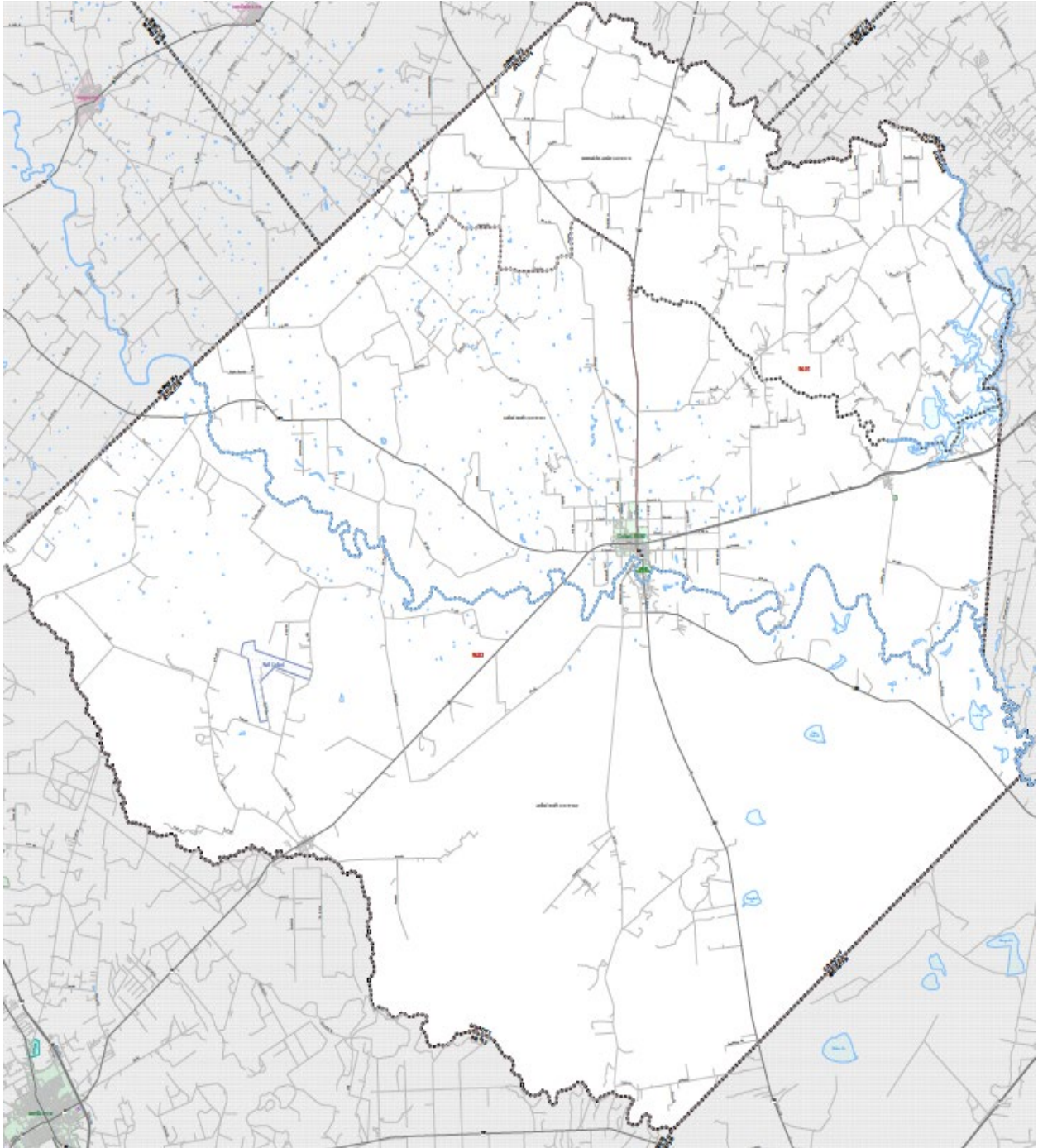
## **Victoria County**



### **Victoria County MSA 47020**

1.00	5.02	14.02	16.07
2.01	6.01	15.01	16.08
2.02	6.02	15.03	17.00
3.01	7.00	15.04	9800.00
3.02	8.00	16.01	
4.00	13.00	16.04	
5.01	14.01	16.05	

## **Goliad County**



### **Goliad County MSA 47020**

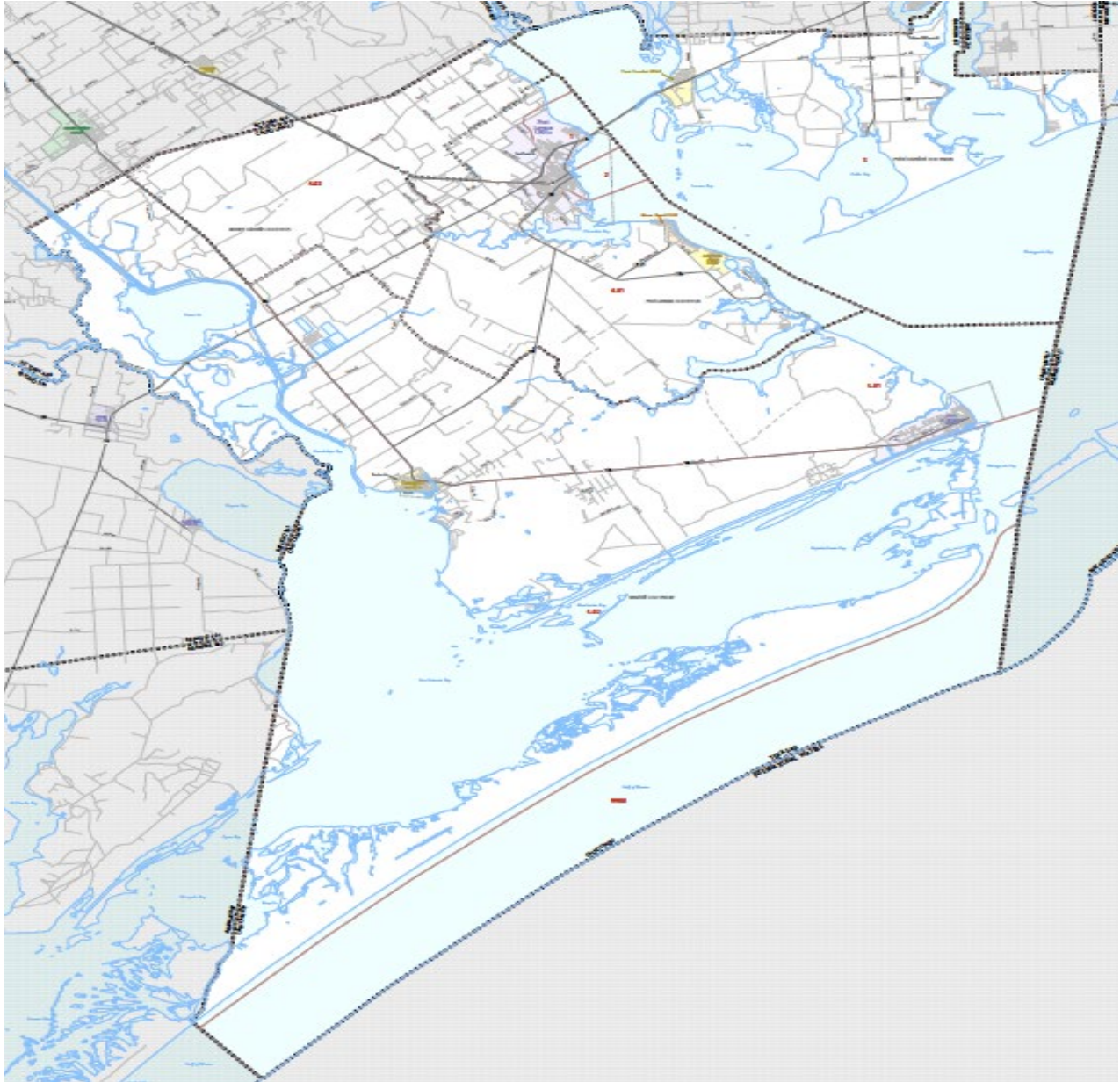
9601.00

9602.00

9999.99



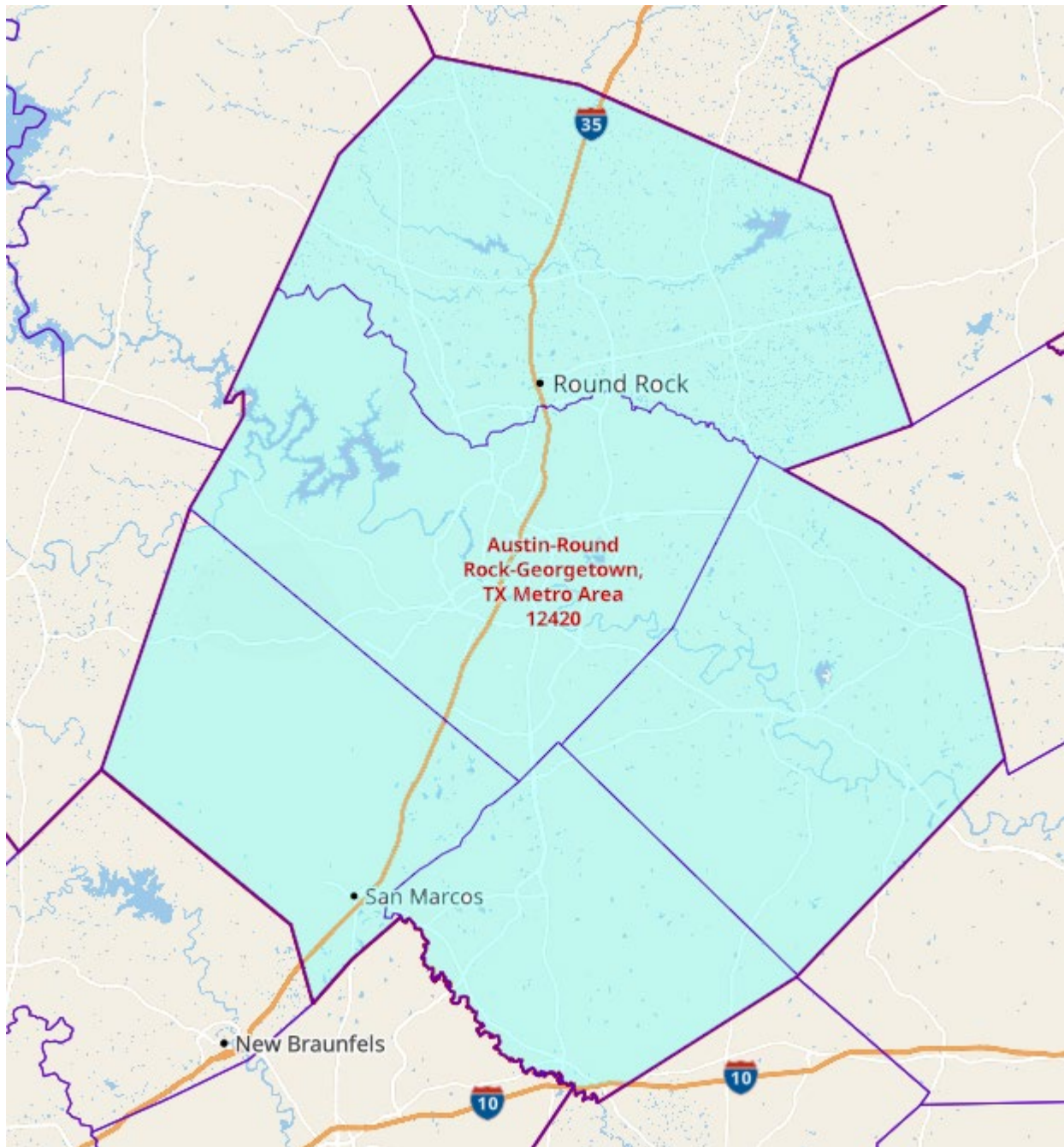
## **Calhoun County**



## **Calhoun County**

1.00  
2.00  
3.00  
4.01  
5.01  
5.02  
9900.00  
9999.99

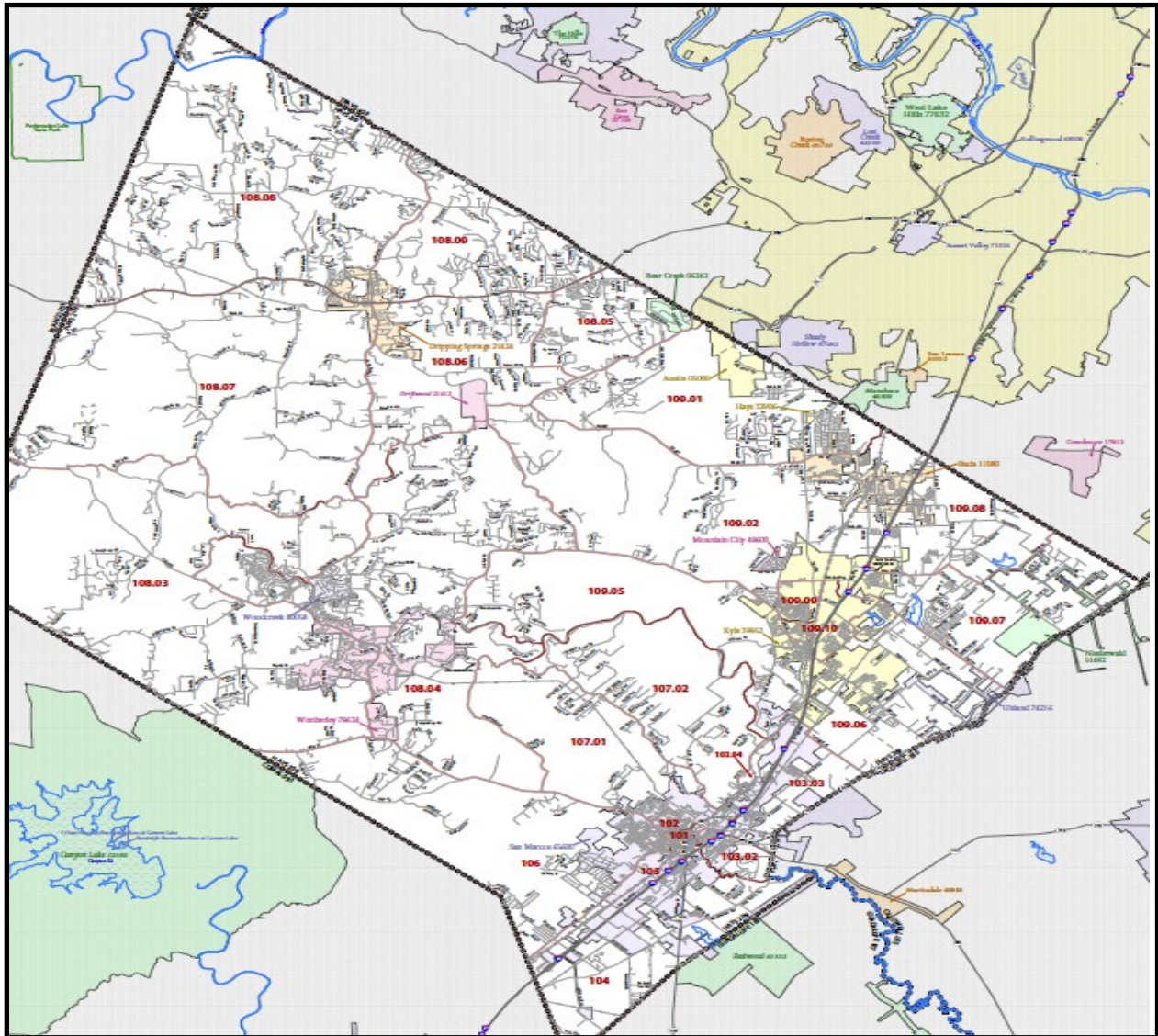
## **Austin-Round Rock-Georgetown, TX MSA**



**Austin-Round Rock-Georgetown, TX MSA – 12420**  
*021-Bastrop, 055-Caldwell, 209 - Hays, 453-Travis, 491-Williamson*



## Hays County

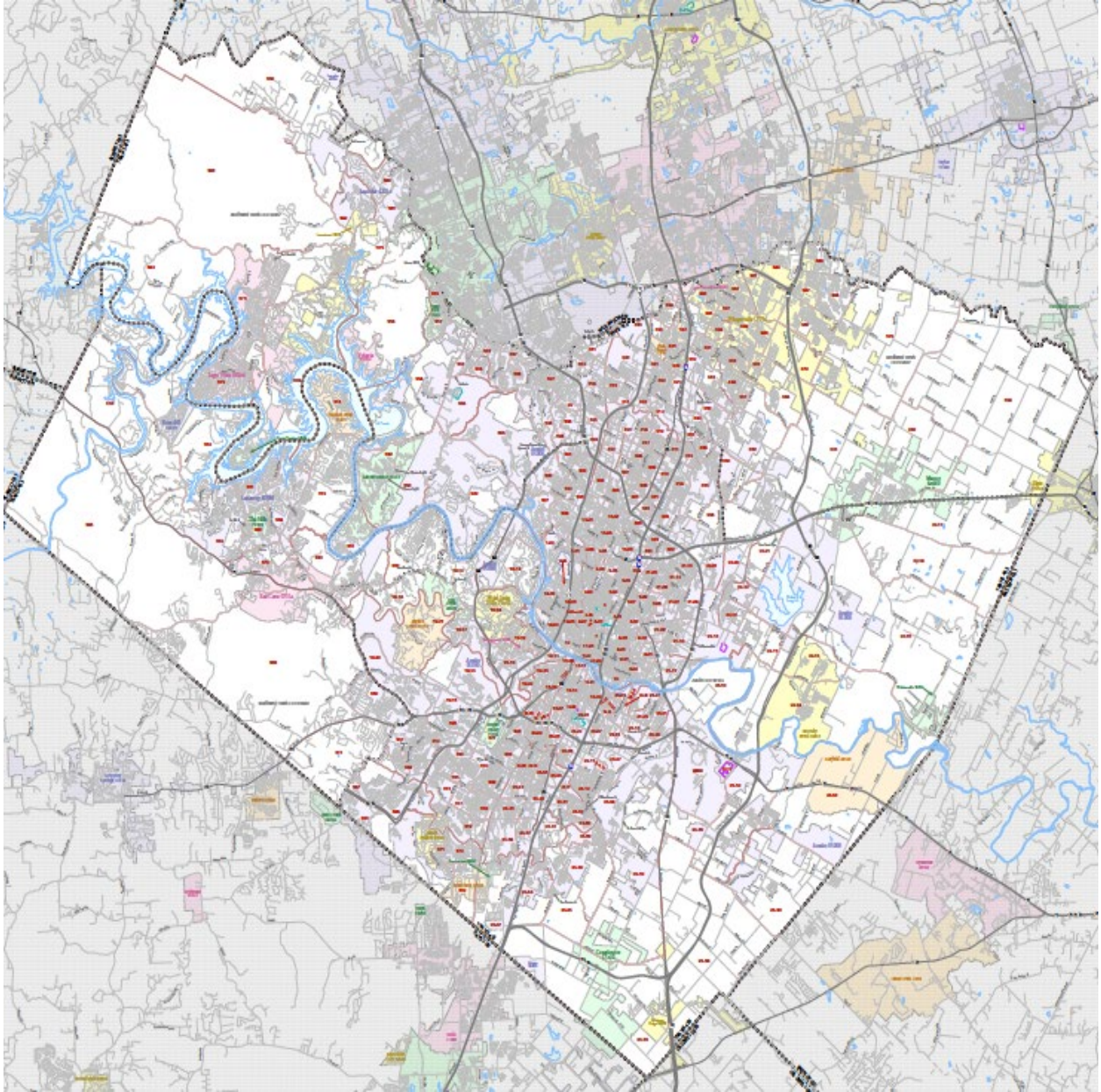


### Hays County MSA 12420

101.00	106.02	108.14	109.16
102.00	106.03	108.15	109.17
103.02	107.02	108.16	109.18
103.05	107.03	108.17	109.19
103.06	107.04	108.18	109.20
103.07	108.06	109.05	109.21
103.08	108.07	109.09	109.22
103.09	108.09	109.11	109.23
104.01	108.10	109.12	109.24
104.02	108.11	109.13	109.25
105.00	108.12	109.14	
106.01	108.13	109.15	



## **Travis County**

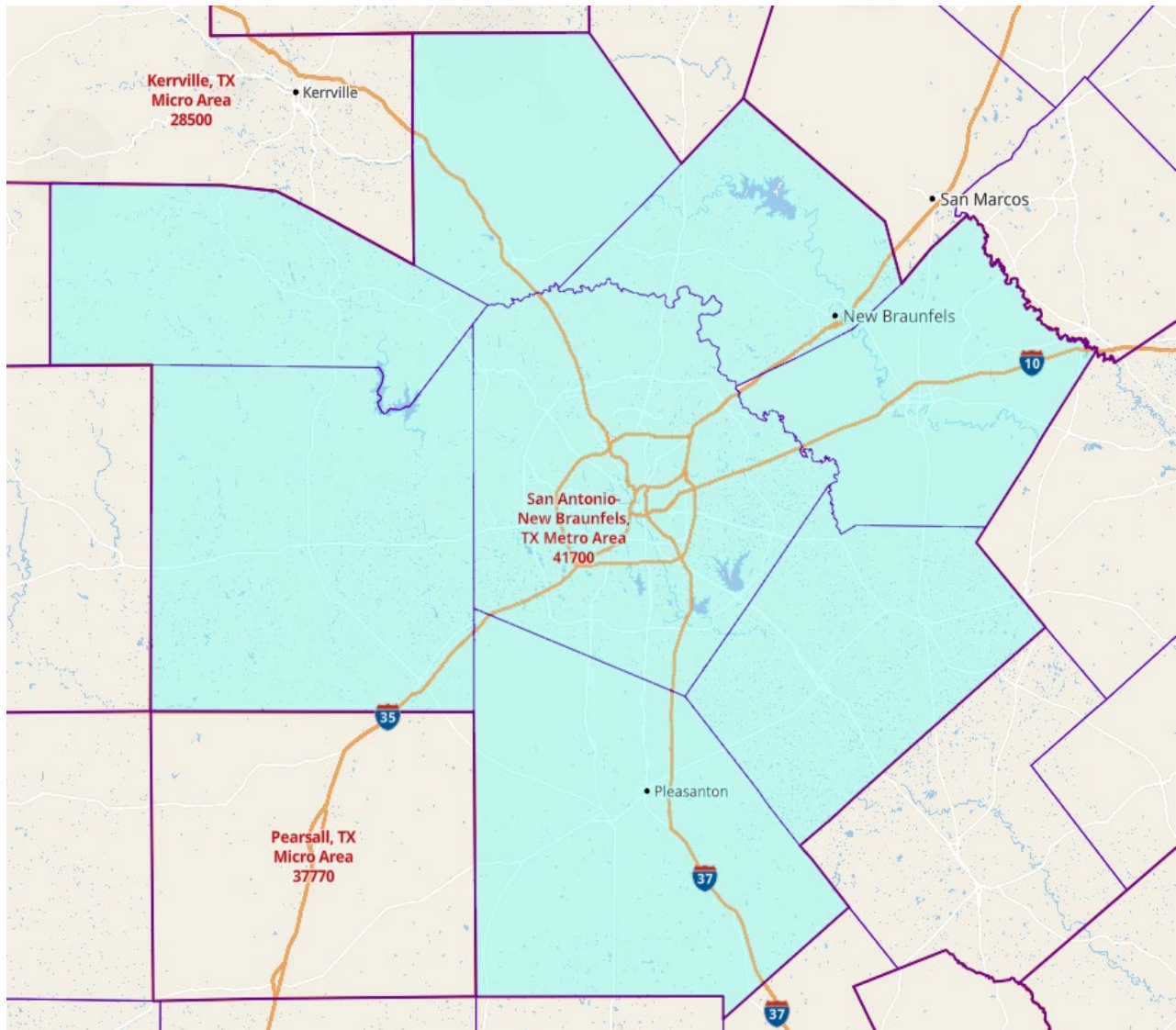


### **Travis County MSA 12420**

1.01	4.01	8.04	13.10	16.04
1.02	4.02	9.01	13.11	16.05
2.03	5.00	9.02	13.12	16.06
2.04	6.01	10.00	14.01	19.10
2.05	6.05	11.01	14.02	19.11
2.06	6.06	11.02	14.03	19.12
3.02	6.07	11.03	15.01	19.13
3.04	6.08	12.00	15.03	19.14
3.05	7.00	13.04	15.04	19.15
3.07	8.01	13.07	15.05	19.16
3.08	8.02	13.08	16.02	19.17
3.09	8.03	13.09	16.03	19.18

19.19	23.26	311.00	357.00	426.00
19.20	23.27	312.00	358.00	427.00
19.21	24.03	313.00	359.00	428.00
19.22	24.07	314.00	360.00	429.00
19.23	24.09	315.00	361.00	430.00
20.02	24.10	316.00	362.00	431.00
20.03	24.11	317.00	363.00	432.00
20.04	24.12	318.00	364.00	433.00
20.06	24.13	319.00	365.00	434.00
20.07	24.19	320.00	366.00	435.00
21.04	24.22	321.00	367.00	436.00
21.05	24.23	322.00	368.00	437.00
21.06	24.24	323.00	369.00	438.00
21.07	24.30	324.00	370.00	439.00
21.08	24.32	325.00	371.00	440.00
21.09	24.34	326.00	372.00	441.00
21.10	24.36	327.00	373.00	442.00
21.11	24.37	328.00	374.00	443.00
21.12	24.38	329.00	375.00	444.00
21.13	24.39	330.00	376.00	445.00
22.01	24.40	331.00	400.00	446.00
22.11	24.41	332.00	401.00	447.00
22.13	24.42	333.00	402.00	448.00
22.14	24.43	334.00	403.00	449.00
22.15	24.44	335.00	404.00	450.00
22.16	24.45	336.00	405.00	451.00
22.17	24.46	337.00	406.00	452.00
22.18	24.47	338.00	407.00	453.00
22.19	24.48	339.00	408.00	454.00
22.20	24.49	340.00	409.00	455.00
22.21	24.50	341.00	410.00	456.00
22.22	24.51	342.00	411.00	457.00
23.04	24.52	343.00	412.00	458.00
23.07	24.53	344.00	413.00	459.00
23.10	25.00	345.00	414.00	460.00
23.13	300.00	346.00	415.00	461.00
23.14	301.00	347.00	416.00	462.00
23.15	302.00	348.00	417.00	463.00
23.16	303.00	349.00	418.00	464.00
23.19	304.00	350.00	419.00	465.00
23.20	305.00	351.00	420.00	466.00
23.21	306.00	352.00	421.00	467.00
23.22	307.00	353.00	422.00	468.00
23.23	308.00	354.00	423.00	469.00
23.24	309.00	355.00	424.00	470.00
23.25	310.00	356.00	425.00	9800.00

## **San Antonio-New Braunfels, TX MSA**

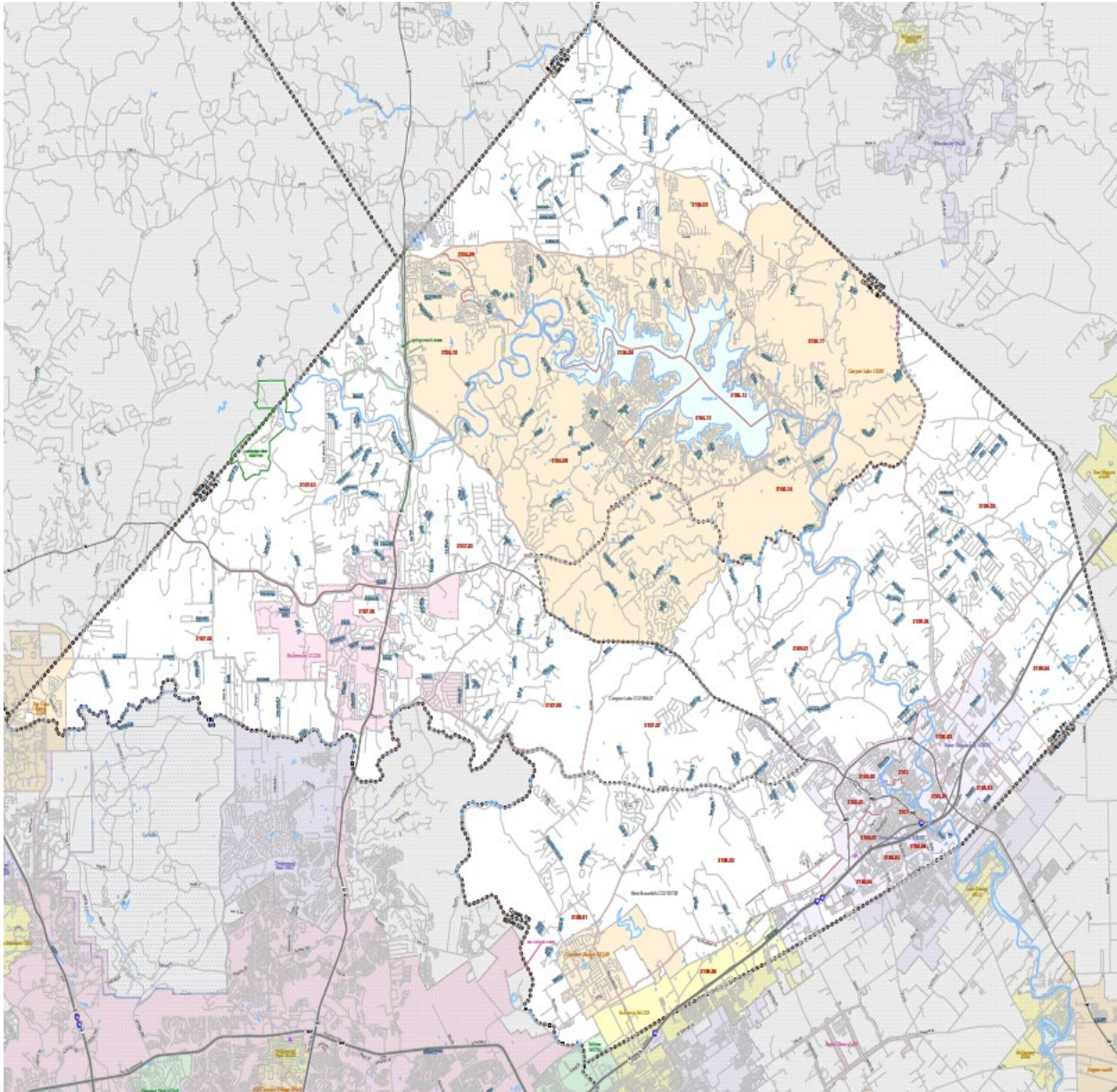


### **San Antonio-New Braunfels, TX MSA – 41700**

*013-Atascosa, 019-Bandera, 029-Bexar, 091-Comal,  
187-Guadalupe, 259-Kendall, 325-Medina, 493-Wilson*



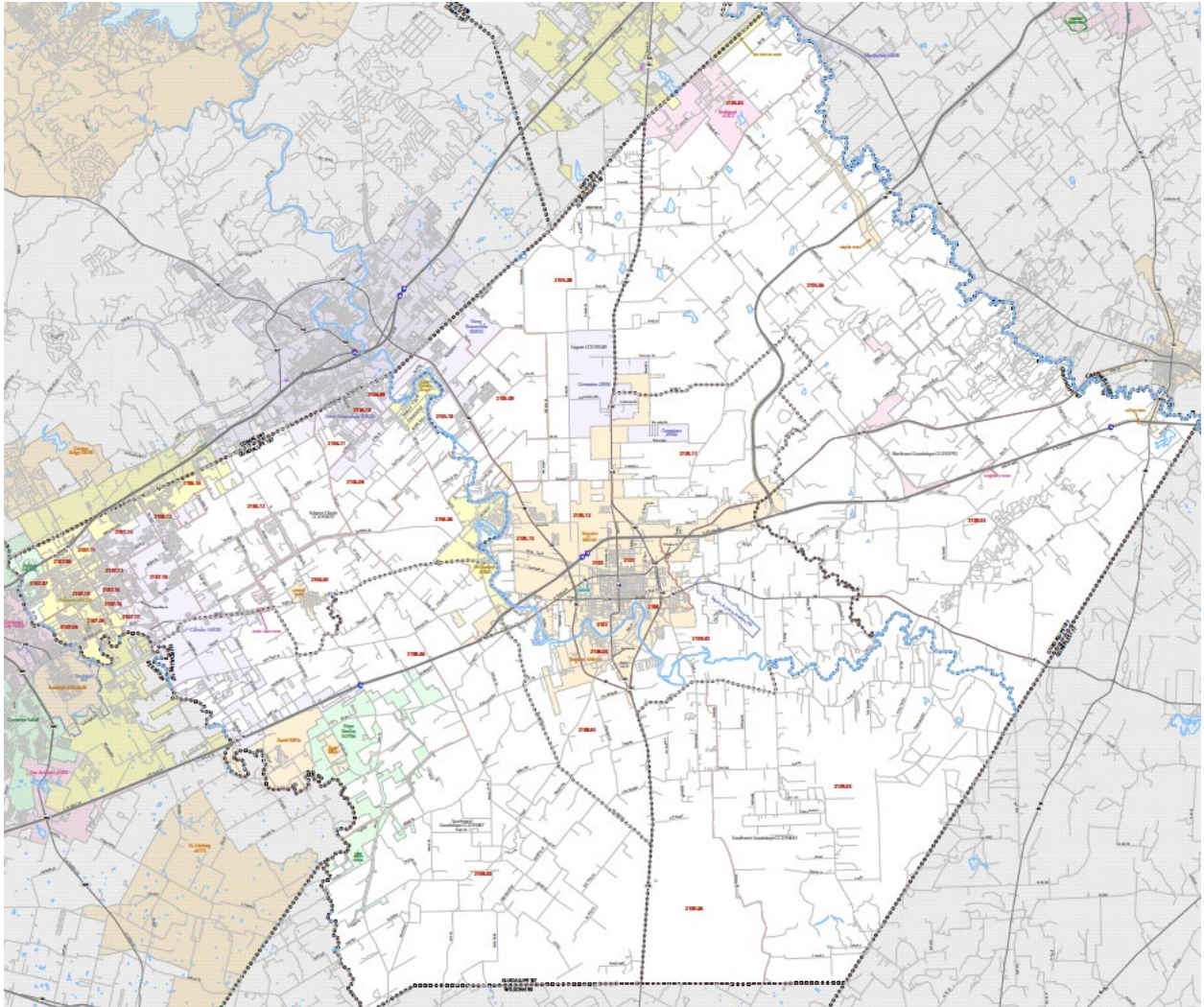
## **Comal County**



### **Comal County MSA 41700**

3101.00	3105.01	3106.11	3107.07
3102.00	3105.02	3106.12	3107.08
3103.01	3105.03	3106.13	3108.03
3103.02	3106.03	3106.14	3108.04
3104.01	3106.04	3107.02	3109.01
3104.04	3106.08	3107.03	3109.03
3104.05	3106.09	3107.05	3109.04
3104.06	3106.10	3107.06	3109.05

## **Guadalupe County**



### **Guadalupe County MSA 41700**

2101.00	2105.11	2106.12	2107.12	2108.06
2102.00	2105.12	2106.13	2107.13	2109.02
2103.00	2105.13	2106.14	2107.15	2109.03
2104.00	2106.03	2107.05	2107.16	2109.04
2105.05	2106.06	2107.06	2107.17	2109.05
2105.06	2106.08	2107.07	2107.18	
2105.08	2106.09	2107.09	2108.03	
2105.09	2106.10	2107.10	2108.04	
2105.10	2106.11	2107.11	2108.05	



# TrustTexas Bank, SSB

## HMDA Disclosure Notice

### ***§345.43 Content and Availability of Public File***

The regulation pertaining to CRA requires the Bank to maintain these files and make them available to the public. Per regulation:

*(2) Banks required to report Home Mortgage Disclosure Act (HMDA) data. A bank required to report home mortgage loan data pursuant part 1003 of this title shall include in its public file a written notice that the institution's HMDA Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's (Bureau's) Web site at [www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda). In addition, a bank that elected to have the FDIC consider the mortgage lending of an affiliate shall include in its public file the name of the affiliate and a written notice that the affiliate's HMDA Disclosure Statement may be obtained at the Bureau's Web site. The bank shall place the written notice(s) in the public file within three business days after receiving notification from the Federal Financial Institutions Examination Council of the availability of the disclosure statement(s).*

**TrustTexas Bank, SSB**  
**HOME MORTGAGE DISCLOSURE ACT NOTICE**

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

These data are available online at the Consumer Financial Protection Bureau's website ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)).

HMDA data for many other financial institutions are also available at this Web site.



# TrustTexas Bank, SSB

## Loan-To-Deposit Ratio

### ***§345.43 Content and Availability of Public File***

The regulation pertaining to CRA requires the Bank to maintain these files and make them available to the public. Per regulation:

*(b)(3) Small banks. A small bank or a bank that was a small bank during the prior calendar year shall include in its public file:*

*(i) The bank's loan-to-deposit ratio for each quarter of the prior calendar year and, at its option, additional data on its loan-to-deposit ratio.*

Even though the regulation only requires four quarters of information in the prior year, TrustTexas Bank wanted to make available to the public not only the required information but an eight quarter rolling graph showing the Bank's Loan-to-Deposit Ratio.

**TrustTexas Bank, SSB**  
**Loan to Deposit Ratio**

