



PUBLIC DISCLOSURE

September 14, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Bank, National Association
Charter Number: 15820

100 American Bank Plaza
Corpus Christi, Texas 78475

Office of the Comptroller of the Currency
San Antonio Field Office
10001 Reunion Place, Suite 250
San Antonio, Texas 78216

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

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Overall CRA Rating

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

The following table indicates the performance level of **American Bank, National Association (American)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	American Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory			
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test rating is based on an excellent level of community development (CD) lending; and adequate lending activity, geographic distribution of loans, and distribution to borrowers and businesses of different income levels and sizes. The bank originated a substantial majority of loans inside its assessment areas (AAs) during the evaluation period.
- The Investment Test rating is based on the significant level of investments, donations, and grants that reflect American’s responsiveness to AA needs.
- The Service Test rating is based on reasonably accessible retail delivery systems to geographies and individuals of different income levels and sizes in the AA. American provides a high level of CD services in the Corpus Christi AA.

Lending in Assessment Area

A substantial majority of the bank’s loans are in its AAs. The bank originated or purchased 88.5 percent of its loans inside the AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. The percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Mortgage	643	88.9	80	11.1	723	164,106	86.5	25,521	13.5	189,627
Small Business	50	83.3	10	16.7	60	26,175	83.3	5,242	16.7	31,417
Total	693	88.5	90	11.5	783	190,281	86.1	30,763	13.9	221,044

Source: 2017 – 2019 Bank HMDA Data and Business Loan Samples; due to rounding, totals may not equal 100.0%

Description of Institution

American Bank, National Association (American), a privately owned, intrastate bank is headquartered in Corpus Christi, Texas. The bank is a wholly-owned subsidiary of American Bank Holding Corporation (American HC), a one-bank holding company based in Corpus Christi. We did not review any affiliate or subsidiary activities of American or related bank holding companies in this Performance Evaluation (PE). The bank's affiliate and/or subsidiary activities do not affect American's capacity to lend or invest in its AA.

American operates 12 full-service banking centers, 7 in the Corpus Christi AA; 2 in the Austin AA; 2 in the Victoria AA; and 1 in Aransas County, a non-Metropolitan Statistical Area (MSA) AA. The bank has not opened or closed any branches since the previous evaluation. In June 2018, American opened two loan production offices (LPO) in Houston. In November 2018, it opened an LPO in San Antonio. The bank closed the Austin LPO in September 2019. Automated teller machines (ATMs) are available at each full-service banking center with six remote ATMs located throughout the Corpus Christi AA. None of the ATMs take deposits. Ten of the 12 full-service banking centers have drive-in facilities.

At December 31, 2019, American reported total assets of \$1.57 billion. Tier 1 capital totaled \$144 million, and the tier 1 leverage ratio was 9.4 percent. Net loans totaled \$925 million and represented 58.8 percent of total assets. The bank's loan-to-deposit ratio was 67.6 percent. The bank's loan portfolio consisted of commercial real estate and construction/development loans secured by real estate (51 percent), commercial and industrial loans (33 percent), residential real estate (12 percent), farmland and farm-related (2 percent), consumer loans (1 percent), and other loans (1 percent).

American's primary focus is the commercial sector and it is a Small Business Administration (SBA) Preferred Lender. The bank offers a variety of home mortgage products through its mortgage center locations; and originates and sells loans into the secondary market. American has participated in mortgage programs designed for low- and moderate-income (LMI) borrowers that are offered through the City of Corpus Christi Housing and Community Development department. In August 2019, American introduced a new Affordable Mortgage Product (AMP) that is designed for borrowers with LMI or for borrowers who purchase or refinance a home located in an LMI geography in the bank's AAs.

The bank offers a full range of consumer loans and deposit products as well as trust, insurance, and brokerage services. American provides consumer and commercial services through its website (www.americanbank.com) and its mobile banking product. American also provides telephone banking and online applications for mortgage and consumer loans.

From 2017 through 2018, American had three AAs. In 2019, Aransas County was removed from the Corpus Christi MSA and designated a non-MSA county. It is now the bank's fourth AA. The Corpus Christi AA is the bank's largest market for both loans and deposits.

American faces strong competition in its markets from local community banks, credit unions, mortgage companies, regional banks, as well as the largest banks in the nation. The June 30, 2019 FDIC Deposit Market Share Report reflects American had a market share of 17.8 percent in the Corpus Christi AA and ranked second out of 15 institutions. Frost Bank ranked first with a deposit market share of 23.1 percent. In the Austin AA, American had a deposit market share of 0.3 percent ranking 32nd out of 64 institutions. The top three institutions, led by Wells Fargo Bank, N.A. with a market share of 20.2 percent, combined for a total deposit market share of 55.7 percent. In the Victoria AA, American had a deposit market share of 4.0 percent ranking fourth out of 13 institutions. Prosperity Bank ranked first with a deposit market share of 52.8 percent.

The prior examination, dated September 11, 2017, assigned an overall "Satisfactory" rating to American's CRA performance. Based on the financial condition, size, product offerings, and branch network, there are no legal, financial, or other factors that inhibit American's ability to help meet credit needs in its AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the Lending Test covered lending activities from January 1, 2017, through December 31, 2019. The evaluation period for the Investment Test and the Service Test covered activities from September 11, 2017, (the date of the previous evaluation) to December 31, 2019. Qualifying activities performed in response to the coronavirus pandemic are not included in the evaluation period and will be considered in the next CRA evaluation.

We tested mortgage loan data reported under the Home Mortgage Disclosure Act (HMDA) from January 1, 2017, through December 31, 2019 to verify accuracy of reported data. We found the data reliable for use in this evaluation. We also tested small business loan data for the same time frame and found it was not reliable to use in this evaluation.

To evaluate lending performance, we used the HMDA data and selected a random sample of loans to small businesses. We did not evaluate loans to small farms as the number and dollar volume of farm loans did not provide for a meaningful analysis. The bank did not request an evaluation of consumer loan activity. We also evaluated community development (CD) loans, investments (including donations, grants, and CD services).

For the geographic and borrower distribution analyses, we compared loans that originated during the evaluation period to the updated 2015 American Community Survey census data effective January 2017. During 2019, the Office of Management and Budget (OMB) revised geographic boundaries for metropolitan areas. The OMB changes affected the Corpus Christi metropolitan area. Prior to 2019, the metropolitan area included Nueces County, San Patricio County, and Aransas County. The 2019 changes removed Aransas County from the Corpus Christi MSA and designated it as a rural non-MSA county. We reviewed 2019 HMDA and small business loan activity and found the number and dollar volume of loans that originated in Aransas County were nominal and would not provide for meaningful analyses. As such, we did not provide separate tables for the 2019 activity in Aransas County.

Selection of Areas for Full-Scope Review

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

American identified three AAs during the evaluation period. The largest AA is comprised of the Corpus Christi MSA (Nueces County, San Patricio County, and Aransas County). As noted previously, Aransas County is no longer included in the Corpus Christi MSA beginning in 2019. The second largest AA includes three of the five counties in the Austin-Round Rock-Georgetown MSA (Hays County, Travis County, and Williamson County). The third AA includes the two counties that comprise the Victoria MSA (Victoria County and Goliad County). For this evaluation, we performed a full-scope review of the Corpus Christi AA and limited-scope reviews of the Austin AA and the Victoria AA. Refer to the “Scope” section under the State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings. The MMSA and state ratings are based on performance in all bank AAs with the most weight placed on the full-scope AA. Refer to the “Scope” section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

American did not have any multi-state AAs or a multi-state rating during the evaluation period; it operates only in Texas.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

State of Texas

CRA rating for the State of Texas¹: Satisfactory

The Lending Test is rated: Low Satisfactory.

The Investment Test is rated: Outstanding.

The Service Test is rated: Low Satisfactory.

The major factors that support this rating include:

Lending Test

- American made a significant volume of CD loans in all its AAs, especially in the Corpus Christi AA.
- Lending activity reflects adequate responsiveness to credit needs in the AAs.
- American originated a substantial majority of loans, 88.5 percent by number and 86.1 percent by dollar volume, inside its AAs.
- The geographic distribution of loans and the distribution by borrower income levels and business sizes are adequate.

Investment Test

- American has a significant level of responsive investments and donations that benefit the AAs and support the bank's strategic focus on small business lending and development.

Service Test

- Retail delivery systems are reasonably accessible in the bank's AAs. The bank provides alternative delivery systems, including ATMs, online banking, and mobile banking that expand access to bank services.
- Banking hours are consistent throughout the AAs and tailored for the convenience and needs of the AAs.
- American provides a relatively high level of CD services.

Description of Institution's Operations in Texas

American operates 12 banking centers in Texas, including the bank's main office in Corpus Christi. Seven banking centers (58 percent) are in the Corpus Christi AA; 2 (17 percent) in the Austin AA, 2 (17 percent) in the Victoria AA, and 1 (8 percent) in the non-MSA AA. We completed a full-scope review of the Corpus Christi AA and performed limited-scope reviews for the other AAs.

As noted previously, the Corpus Christi AA included all three counties in the Corpus Christi, TX MSA. The 2019 OMB changes redefined the Corpus Christi MSA to include only Nueces County and San Patricio County. Aransas County was removed and designated as a non-MSA county. The bank's AAs meet regulatory requirements and do not arbitrarily exclude low- or moderate-income geographies.

¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Corpus Christi AA

American operates 7 branches and ATMs, along with 6 remote ATMs in the Corpus Christi AA. Six branches are in the city of Corpus Christi and one is in Port Aransas. The bank does not have branches in San Patricio County. Eighty-two percent of the bank's deposits are in this AA. Based on HMDA and CD loan activity during the evaluation period, 91 percent of the loans originated were in this AA.

The June 30, 2019 FDIC Market Share Report reflects American ranks second of 15 institutions in the AA with a deposit market share of 17.8 percent; Frost Bank, a large regional bank, ranks first with a deposit market share of 23.1 percent. American faces strong competition in this AA from large national banks (Wells Fargo Bank N.A., Bank of America, N.A., and BBVA USA), large regional banks (Prosperity Bank, Plains Capital Bank, and International Bank of Commerce), and other types of financial institutions.

The 2019 Peer Mortgage Data reflects American ranked 22nd of 446 mortgage lenders with a market share of 1.35 percent based on number of mortgage loans originated in the Corpus Christi AA. The Navy Army Community Credit Union is ranked first with a market share of 10.7 percent.

The Moody's Analytic Report for Corpus Christi shows tourism is the largest industry in the area due to its impact on hotels/motels and restaurants. Government entities and healthcare are the largest industries. Major employers include Corpus Christi Independent School District, Naval Air Station Corpus Christi, HEB Grocery, Corpus Christi Army Depot, and Christus Spohn Hospital.

The Bureau of Labor Statistics reflects an unemployment rate of 4.3 percent at year end 2019 for the Corpus Christi AA. The rate is higher than the state average of 3.5 percent and the national average of 3.7 percent. The 2015 ACS data shows 13.6 percent of the households had incomes below the poverty level.

To help identify needs and opportunities in the AA, we reviewed two recent regulatory agency contacts with organizations that focus on affordable housing and small business economic development. The contacts indicate a need for home buyers assistance programs, affordable housing, and making loans to small businesses.

The following tables provide additional information about the Corpus Christi AA. The first table reflects data for the three-county AA from 2017 to 2018; the second table reflects data on the updated AA that includes only Nueces County and San Patricio County.

Demographic Information of the Corpus Christi Assessment Area Nueces, San Patricio, and Aransas Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	104	5.8	27.9	31.7	30.8	3.8
Population by Geography	442,422	5.0	30.5	33.0	30.9	0.6
Housing Units by Geography	186,910	4.8	29.5	33.7	32.0	0.0
Owner-Occupied Units by Geography	95,035	3.2	27.4	33.1	36.3	0.0
Occupied Rental Units by Geography	64,328	6.7	32.8	32.8	27.7	0.0
Vacant Units by Geography	27,547	5.5	29.0	37.8	27.7	0.0
Businesses by Geography	26,696	3.1	30.1	33.7	32.8	0.3
Farms by Geography	843	2.1	23.5	29.9	44.4	0.1
Family Distribution by Income Level	110,737	22.6	17.4	18.2	41.8	0.0
Household Distribution by Income Level	159,363	25.0	16.2	17.0	41.8	0.0
Median Family Income MSA - 18580 Corpus Christi, TX MSA		\$57,801	Median Housing Value			\$124,710
			Median Gross Rent			\$893
			Families Below Poverty Level			13.7%

Source: 2015 ACS and 2018 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.

Demographic Information of the Corpus Christi Assessment Area Nueces and San Patricio Counties						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	98	6.1	27.6	34.7	28.6	3.1
Population by Geography	418,130	5.3	29.7	35.7	28.5	0.6
Housing Units by Geography	171,296	5.2	28.6	36.0	30.2	0.0
Owner-Occupied Units by Geography	87,995	3.5	26.5	36.2	33.8	0.0
Occupied Rental Units by Geography	61,686	7.0	32.1	34.5	26.3	0.0
Vacant Units by Geography	21,615	7.0	27.1	39.0	27.0	0.0
Businesses by Geography	28,000	3.3	29.4	35.7	31.2	0.3
Farms by Geography	837	2.2	22.2	33.9	41.6	0.1
Family Distribution by Income Level	104,286	22.4	17.3	18.1	42.2	0.0
Household Distribution by Income Level	149,681	24.7	16.0	17.1	42.2	0.0
Median Family Income		\$58,364	Median Housing Value			\$122,079
			Median Gross Rent			\$897
			Families Below Poverty Level			13.6%

Source: 2015 ACS and 2019 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.

Austin AA

The Austin AA includes 3 of 5 counties (Hays County, Travis County, and Williamson County) in the Austin-Round Rock-Georgetown MSA. American operates 2 branches and 2 ATMs in the Austin AA. Eight percent of the bank's deposits are in this AA. Based on HMDA and CD loan activity during the evaluation period, 7 percent of the loans originated were in this AA.

The June 30, 2019 FDIC Market Share Report reflects American ranks 32nd of 64 institutions in the AA with a deposit market share of 0.3 percent. American faces strong competition from large national banks including Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A., and Bank of America, N.A., with deposit market shares of 20.2 percent, 18.5 percent, and 16.9 percent, respectively.

The 2019 Peer Mortgage Data reflects American ranked 301st of 863 mortgage lenders with a market share of 0.02 percent based on number of mortgage loans originated in the Austin AA. Wells Fargo Bank, N.A. ranked first with a market share of 7.9 percent, and JPMorgan Chase Bank, N.A. is second with a market share of 4.8 percent.

The Moody's Analytic Report for Austin shows leading industries are computer and electronic products, education, and healthcare. Major employers include University of Texas at Austin, Dell Inc., Seton Healthcare Network, and St. David's Healthcare.

The Bureau of Labor Statistics reflects an unemployment rate of 2.4 percent at year end 2019 for the Austin MSA. The rate is lower than the state average of 3.5 percent and the national average of 3.7 percent. The 2015 ACS data shows 12.4 percent of the households had incomes below the poverty level.

To help identify needs and opportunities in the AA, we reviewed two recent regulatory agency contacts with organizations that focus on affordable housing and economic development. The contacts indicate a need for affordable housing, loans to small businesses, and financial literacy.

The following table provides additional information about the Austin AA.

Demographic Information of the Austin Assessment Area Hays County, Travis County, and Williamson County						
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	197,455	7.0	12.5	33.4	45.8	1.3
Farms by Geography	3,970	5.2	14.7	39.5	40.4	0.3
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%
<i>Source: 2015 ACS and 2019 D&B Data. Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Victoria AA

The Victoria AA includes both counties in the Victoria MSA, Goliad County and Victoria County. American operates 2 branches and 2 ATMs in the Victoria AA. Seven percent of the bank's deposits are in this AA. Based on HMDA and CD loan activity during the evaluation period, 1 percent of the loans originated were in this AA.

The June 30, 2019 FDIC Market Share Report reflects American ranks fourth of 18 institutions in the AA with a deposit market share of 3.9 percent. American faces strong competition from a large regional bank, Prosperity Bank that ranks first with a deposit market share of 51.8 percent and from a large national bank, Wells Fargo Bank N.A., with a deposit market share of 24.98 percent.

The 2019 Peer Mortgage Data reflects American ranked 130th of 220 mortgage lenders with a market share of 0.06 percent based on number of mortgage loans originated in the Victoria AA. Wells Fargo Bank, N.A. ranked first with a market share of 7.9 percent.

The Moody's Analytic Report for Victoria shows petrochemical-related jobs and medical-related jobs. Major employers include Formosa Plastic, The Inteplast Group, DeTar Healthcare System, and Citizens Medical Center.

The Bureau of Labor Statistics reflects an unemployment rate of 3.4 percent at year end 2019 for the Victoria AA. The rate is slightly lower than the state average of 3.5 percent and the national average of

3.7 percent. The 2015 ACS data shows 12.4 percent of the households had incomes below the poverty level.

To help identify needs and opportunities in the AA, we reviewed a recent regulatory agency contact with an organization that focuses on economic development. The contact indicated a need for home loans, particularly affordable housing, and loans to small businesses.

The following table provides additional information about the Victoria AA.

Demographic Information of the Victoria Assessment Area Goliad County and Victoria County						
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	6,640	2.1	32.8	30.0	35.0	0.2
Farms by Geography	255	0.8	17.3	41.2	40.8	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%
<i>Source: 2015 ACS and 2019 D&B Data. Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Aransas County AA

As noted previously in this document, OMB revised geographic boundaries for metropolitan areas in 2019. The changes resulted in removing Aransas County from the Corpus Christi MSA and designating it a non-MSA rural county. American operates 1 branch and 1 ATM in Aransas County. Three percent of the bank's deposits are in this AA. Based on HMDA and CD loan activity during the evaluation period, less than 1 percent of the bank's loans originated in this AA.

The June 30, 2019 FDIC Market Share Report reflects American ranks fourth of 6 institutions in the AA with a deposit market share 11.2 percent. American faces competition from a large regional bank, Prosperity Bank that ranks first with a deposit market share of 35.1 percent and from a large national bank, Wells Fargo Bank N.A., with a deposit market share of 29.9 percent.

The 2019 Peer Mortgage Data reflects American ranked 20th of 230 mortgage lenders with a market share of 1.23 percent based on number of mortgage loans originated in the Aransas County. Wells Fargo Bank, N.A. ranked first with a market share of 6.4 percent.

Aransas County is on the Gulf of Mexico and offers a laid-back quality of life. The fastest growing population in this area is retirees relocating to this area. Major industries include seafood, oil production, tourism, sport hunting and fishing, boating and water sports. Top employers include Aransas County Independent School District, Aransas County Government, Walmart, and HEB Grocery.

The Bureau of Labor Statistics reflects an unemployment rate of 3.9 percent at year end 2019 for the Aransas County. The rate is slightly higher than the state average of 3.5 percent and the national average of 3.7 percent. The 2015 ACS data shows 14.2 percent of the households had incomes below the poverty level.

To help identify needs and opportunities in the AA, we reviewed a recent regulatory agency contacts with an organization that focuses on economic development. The contact indicated a need for home loans, particularly affordable housing, and loans to small businesses.

The following table provides additional information about the Aransas County AA.

Demographic Information of the Aransas County Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	6	0.0	16.7	33.3	33.3	16.7
Population by Geography	24,292	0.0	16.5	49.2	34.4	0.0
Housing Units by Geography	15,614	0.0	13.7	55.8	30.5	0.0
Owner-Occupied Units by Geography	7,040	0.0	11.7	55.2	33.1	0.0
Occupied Rental Units by Geography	2,642	0.0	22.0	51.0	27.1	0.0
Vacant Units by Geography	5,932	0.0	12.3	58.7	29.0	0.0
Businesses by Geography	1,930	0.0	10.9	43.3	45.8	0.0
Farms by Geography	66	0.0	9.1	59.1	31.8	0.0
Family Distribution by Income Level	6,451	26.2	19.3	19.4	35.2	0.0
Household Distribution by Income Level	9,682	29.0	18.9	15.9	36.1	0.0
Median Family Income Non-MSAs - TX		\$52,198	Median Housing Value			\$153,577
			Median Gross Rent			\$804
			Families Below Poverty Level			14.2%

Source: 2015 ACS and 2019 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.

Scope of Evaluation in Texas

We performed a full-scope review of the Corpus Christi AA and limited-scope reviews of the Austin AA and the Victoria AA. The Corpus Christi AA was selected for a full-scope review because 82 percent of bank deposits and 86 percent of home mortgage and CD loans originated in the AA. We placed the most weight on lending activities in the Corpus Christi AA when determining the overall conclusion.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Corpus Christi AA is adequate. The level of CD lending had a positive impact on lending performance given the bank's responsiveness to CD lending activities.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs. As shown in the following tables, the bank's lending activity for home mortgage and CD loans in the Corpus Christi AA exceeds deposits in the AA. The tables do not include data for small loans to businesses as we found the bank's reported data, including that for geographic location, was not reliable. The bank's performance context document reflects that during the evaluation period, the bank originated 1,978 loans totaling \$329.5 million. The number and dollar volume of small loans to businesses reflects the bank does make these types of loans.

Number of Loans*					
Assessment Area	Home Mortgage	Community Development	Total	%State Loans	%State Deposits
Full-Scope Review					
Corpus Christi AA	581	30	611	91.5	82.0
Limited-Scope Reviews					
Austin AA	45	3	48	7.2	8.1
Victoria AA	3	4	7	1.0	6.6
Non-MSA AA		2	2	0.3	3.3
Total	629	39	668	100.0	100.0
*The table presents data for all assessment areas. The narrative below addresses performance in full-scope areas only.					

Dollar Volume of Loans (000's)*					
Assessment Area	Home Mortgage	Community Development	Total	% State Loans	% State Deposits
Full-Scope Review					
Corpus Christi AA	139,492	84,937	224,429	85.9	82.0
Limited-Scope Reviews					
Austin AA	20,836	7,850	28,686	11.0	8.1
Victoria AA	383	6,500	6,883	2.6	6.6
Non-MSA AA		1,330	1,330	0.5	3.3
Total	160,711	100,617	261,328	100.0	100.0

*The table presents data for all assessment areas. The narrative below addresses performance in full-scope areas only.

American's lending activity in the Corpus Christi AA is excellent based on home mortgage and CD loans. The bank's percentage of loans by number exceeds the percentage of AA deposits. The percentage of loans by dollar volume is near to the percentage of AA deposits.

Aggregate lending data reflects strong competition for home mortgage loans in the Corpus Christi AA. The 2019 aggregate HMDA data shows American had a 1.35 percent market share ranking 22nd out of 446 mortgage lenders. The top three lenders combined for a total market share of 20.9 percent; the institution ranked first had a market share of 10.7 percent. The bank's market share and rank for mortgage lending is below its deposit market share and rank. The FDIC Deposit Market Share Report for June 30, 2019, reflects American ranked second of 15 institutions in the AA with a deposit market share of 17.8 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in the Corpus Christi AA.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans in the Corpus Christi AA during the evaluation period is poor. The percentage of bank loans in low-income geographies is below the percentage of owner-occupied housing units in these areas. The bank's performance is below the aggregate HMDA lending data reported by other mortgage lenders in the area. The percentage of bank loans in moderate-income geographies is below the percentage of owner-occupied housing units in moderate-income geographies. The bank's performance is below the aggregate HMDA lending data reported by other mortgage lenders in the area.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses in the Corpus Christi AA during the evaluation period is adequate. The geographic distribution of small loans to businesses in low-income geographies is very poor as the bank did not make any loans in low-income geographies. The geographic distribution of small loans to businesses in moderate-income geographies is excellent. The percentage of bank loans in

moderate-income geographies slightly exceeds the percentage of businesses located in moderate-income geographies. The bank's performance exceeds aggregate data from other area small business lenders.

Lending Gap Analysis

We reviewed summary reports, maps, and bank-provided information and did not identify any unexplained or conspicuous gaps in geographic distribution of loans.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

The distribution of home mortgage loans to individuals of different income levels is poor. The percentage of bank loans to low-income borrowers is significantly below the percentage of low-income families in the Corpus Christi AA and somewhat lower than the aggregate HMDA lending data reported by other mortgage lenders in the area. The percentage of bank loans to moderate-income borrowers is below the percentage of moderate-income families in the AA and below the aggregate HMDA lending data reported by other mortgage lenders in the area. The demand for affordable housing, rising costs of housing in the AA, and challenges associated with down payment and closing costs impacted the bank's performance among LMI borrowers.

Small Loans to Businesses

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

The distribution of small loans to businesses in the Corpus Christi AA is adequate. The percentage of bank loans to businesses with annual revenues of \$1 million or less is lower than the reported percentage of small businesses in the AA; however, the bank's percentage exceeds the aggregate percentage reported by other businesses lenders in the AA.

Community Development Lending

The institution is a leader in making CD loans. The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The volume of CD loans in the Corpus Christi AA is excellent. During the evaluation period, the bank originated and/or renewed 30 CD loans totaling \$87.9 million in the AA. The dollar volume represented 74.4 percent of the tier 1 capital allocated to the AA based on December 31, 2019, call report information. The number of CD loans in the Corpus Christi AA represented 76.9 percent of the total number of CD loans the bank originated and/or renewed during the evaluation period.

The number and dollar volume of CD loans reflected excellent responsiveness to credit and community needs as the loans provided for revitalization and stabilization in the AA. In 2017, Hurricane Harvey struck the area and it (most notably Aransas County) was declared a federal disaster area. American made several loans to help revitalize and stabilize damaged areas and provided for jobs, including those to LMI individuals. The bank made a \$2.8 million loan that financed repairs to a retail center damaged by the hurricane; a \$2.57 million loan that allowed renovations to three restaurants damaged by the hurricane; and a \$1.58 loan that financed building a hotel that created jobs for 15 LMI individuals.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. American has participated in several programs that help LMI borrowers. The bank identified a need in its markets for a mortgage loan product targeted to LMI borrowers and LMI geographies and created an Affordable Mortgage Product (AMP). American introduced the AMP program in August 2019. The program is designed for borrowers who are purchasing or refinancing a home located in an LMI geography in the bank’s AAs or for LMI borrowers. The bank approved an initial \$5 million to this program.

During 2019, American originated 11 loans totaling \$1.7 million through the AMP program. Bank information reflects eight of the 11 loans were to LMI borrowers. The program received a good response in the community, and the bank increased the initial program to \$10 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Austin AA and in the Victoria AA is consistent with the bank’s overall performance under the Lending Test in the Corpus Christi AA.

Refer to Tables O through R in the state of Texas section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in Texas is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Corpus Christi AA is excellent.

American has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors. The bank exhibits excellent responsiveness to credit and community economic development needs and occasionally uses innovative and/or complex investments to support CD initiatives.

The following table summarizes outstanding investment activity by AA and includes qualified statewide, regional, and national investments outside the bank’s AA’s. Donations and grants are included in current period investment totals. The table does not include a \$10 million investment made in the CRA Qualified Investment Fund (CRAIX) on December 31, 2019. American requested the investment be allocated

specifically to the Victoria AA and the Corpus Christi AA. We did not include this investment in the table because the CRAIX had not allocated the funds yet on the date of purchase. We include it here to provide an example of the bank's efforts to be responsive to needs in AAs with limited opportunities for investment.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	% of Total #	\$ (000's)	% of Total \$	#	\$ (000's)
Full Scope										
Corpus Christi AA	14	6,166	83	6,557	97	47.8	12,723	22.2	4	80
Limited Scope										
Austin AA	11	8,921	22	9,845	33	16.2	18,766	32.8	0	0
Victoria AA	0	0	14	16	14	6.9	16	0.03	0	0
Non-MSA	0	0	4	6	4	2.0	6	0.01	0	0
Statewide, Regional or Nationwide	53	22,152	2	3,508	55	27.1	25,661	44.9	0	0
Total	78	37,239	125	19,932	203	100.0	57,172	100.0	4	80
* Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.										
** Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.										

American's qualifying investments demonstrate excellent responsiveness in meeting identified credit and community development needs in the bank's AAs. During the evaluation period, American made investments, donations, and contributions totaling \$67.2 million; the dollar volume outstanding as of December 31, 2019, is \$57.2 million.

The volume of investment activity outside the bank's AAs is excellent. Most of these investments are prior period investments that focus on supporting education in communities with high levels of economically disadvantaged students and providing affordable housing to LMI borrowers and in LMI geographies.

During the evaluation period, American made current period qualified investments totaling \$6.2 million. Examples of the investments include:

- \$2.6 million in Fannie Mae mortgage-backed securities to support affordable housing in the Corpus Christi AA. The mortgage pools included LMI borrowers and LMI geographies in Nueces County.
- \$3.6 million in municipal securities that support Robstown Independent School District and focus on education in a community where 89 percent of the students are economically disadvantaged.

During the evaluation period, American made donations, contributions, and grants totaling \$424 thousand to organizations that provide services to and for LMI individuals and geographies in the bank's AAs. The largest portion \$325 thousand was in the Corpus Christi AA and focused on scholarships funding, assistance to local healthcare and community-service groups, affordable housing, and disaster recovery efforts after Hurricane Harvey. The bank innovatively developed a "Jeans for a Cause" donation program that matched employee contributions to local charities. Other examples include:

- \$100 thousand pledge to Texas A&M University – Corpus Christi to fund scholarship endowments. Pledge paid with an annual donation of \$20 thousand for 5 years.

- \$100 thousand to Christus Spohn Health System Foundation to support healthcare access to underserved population.
- \$62 thousand in several donations throughout the evaluation period to Driscoll Children’s Hospital to support healthcare services to families in need.
- \$12 thousand to Habitat for Humanity Corpus Christi to support affordable housing for LMI individuals.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank’s performance under the Investment Test in the Austin AA is consistent with the bank’s overall performance under the Investment Test in the full-scope review area.

Based on a limited-scope review, the bank’s performance under the Investment Test in the Victoria AA is weaker than the bank’s overall performance under the Investment Test in the full-scope review area. American made a relatively low level of qualified investments in this AA. However, given the limited opportunities to make investments in the Victoria AA and the bank’s efforts to improve the investment levels in this AA, performance is adequate.

SERVICE TEST

The bank’s performance under the Service Test in Texas is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Corpus Christi AA is good.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
Full-Scope Review											
Corpus Christi AA	81.94	7	58.3	0.0	28.6	28.6	42.9	5.8	29.7	35.7	28.5
Limited-Scope Reviews											
Austin AA	8.15	2	16.6	0.0	0.0	0.0	100.0	10.7	20.4	36.6	31.1
Victoria AA	6.58	2	16.6	0.0	0.0	100.0	0.0	3.4	32.2	31.2	33.1
Non-MSA AA	3.33	1	8.3	0.0	0.0	0.0	100.0	0.0	16.5	49.2	34.3
Total	100.0	12	100.0	0.0	16.6	33.3	50.0	9.3	22.6	36.3	30.8

American operated eight banking offices and 13 ATMs (including six remote ATMs) inside the Corpus Christi AA during the evaluation period. Six of the eight offices are in Nueces County (all in Corpus Christi); two are in Aransas County (one in Port Aransas and one in Rockport). There are no banking offices in San Patricio County. All offices are readily accessible on major thoroughfares, and the remote

ATMs are in public places such as hospitals and grocery stores. American did not open or close any branches during the evaluation period.

The percentage of bank branches in low-income geographies is below the percentage of AA population in low-income geographies. The percentage of branches in moderate-income geographies is near the percentage of the AA population in moderate-income geographies. The bank's head office (Carancahua) and one branch (Shoreline) are in a moderate-income CT. The South office is in a middle-income CT but is adjacent to three moderate-income CTs. The Alameda office is in an upper-income CT and adjacent to a moderate-income CT. Three ATMs are in low- and moderate-income CTs. The remaining branches and ATMs are in upper- and middle-income CTs.

American offers several alternative delivery channels that are reasonably effective in providing access to banking services in all geographies and to all individuals. The bank's website provides online banking services for consumer and commercial customers. Bank customers can view account balances, pay bills, transfer funds among their American accounts, as well as transfer funds to other banks. Consumer customers can also submit mortgage and consumer loan applications online. American's mobile banking product allows customers to pay bills, transfer funds, and deposit checks remotely. The bank also offers text-based banking services through its mobile application allowing customers to access account balances, view account history, and initiate one-time account transfers. Commercial customers can deposit checks remotely, pay bills, and use online ACH origination, wire, and payroll services. American also provides a free 24-hour telephone banking service (with a Spanish language option) that allows customers to transfer funds and to check account balances.

American offers traditional bank services at all branch locations. Residential lending services are offered primarily at mortgage centers in four offices located in the Corpus Christi AA; however, mortgage lenders are made available at all locations, as necessary. The bank also offers non-bank investment services through its Trust & Management Group and American Investment Services. American also offered insurance services through its affiliate, Borden Insurance, during the evaluation period.

Banking hours and services are consistent throughout the AA and tailored to the convenience and needs for the AA, including low- and moderate-income geographies and/or individuals. All branch lobbies are open Monday through Friday, from 9:00 a.m. to 4:00 p.m., with three offices open until 5:00 p.m. on Fridays. Drive through hours are Monday through Friday from 8:00 a.m. to 6:00 p.m.; and Saturday from 9:00 a.m. to 1:00 p.m. In addition, customer service representatives are available by phone Monday through Friday from 7:00 a.m. to 6:00 p.m.

Community Development Services

The institution provides a relatively high level of CD services.

During the evaluation period, 21 bank personnel devoted 1,442 community service hours to 30 different qualifying organizations in the Corpus Christi AA. Activities included providing leadership and technical expertise through board and committee membership. The qualifying organizations focus on providing essential services to LMI individuals and families, affordable housing, and economic development in the AA. Examples of CD services in the Corpus Christi AA during the evaluation period are summarized below.

- Habitat for Humanity helps provide affordable housing to members of the community. An American employee provided 147 service hours of leadership and technical expertise as a part of the organization's Board.
- The Corpus Christi Housing Authority is committed to building and maintaining affordable housing for low- and mixed-income residents of the community. An American employee provided 90 service hours of leadership and technical expertise as a part of the organization's Board.
- Catholic Charities is a non-profit social service agency, serving the City of Corpus Christi and surrounding counties. The agency reaches out to approximately 535,000 individuals and focuses on assisting and preventing homelessness and hunger; and providing fair and affordable housing. An American employee provided 66 service hours of home buying education classes.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Austin and Victoria AAs is weaker than the bank's overall performance in the Corpus Christi AA. Performance is weaker as there are no branches in low- or moderate-income CTs in any of the limited-scope AAs. In 2019, Aransas County (the non-MSA AA) had only one activity for a total of six hours. Weaker performance in the limited-scope AAs had a limited impact on the overall Service Rating. The bank has fewer branches and deposits in these AAs.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2017 – 12/31/2019: Lending Test 09/11/2017 – 12/31/2019: Investment Test and Services Test	
Bank Products Reviewed:	Home mortgage, small business, community development loans, qualified investments, and community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not Applicable	Not Applicable	Not Applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Texas		
Corpus Christi AA	Full-Scope	From 2017 to 2018, AA includes counties of Nueces, San Patricio, and Aransas. In 2019, only includes counties of Nueces and San Patricio.
Austin AA	Limited Scope	Includes counties of Hays, Williamson, and Travis.
Victoria AA	Limited Scope	Includes counties of Victoria and Goliad

Appendix B: Summary of MMSA and State Ratings

RATINGS American Bank, National Association				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
American Bank, N.A.	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
State:				
Texas	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2017 - 2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Full-Scope Review																			
Corpus Christi AA	581	139,492	85.1	10,470	3.3	0.2	0.6	27.1	8.0	13.8	34.1	36.7	32.9	35.5	55.1	52.7	0.0	0.0	0.0
Limited-Scope Reviews																			
Austin AA	45	20,836	12.7	82,324	4.1	9.2	3.5	15.8	29.3	14.0	39.5	17.8	42.6	40.5	41.7	39.7	0.2	2.1	0.2
Victoria AA	3	383	0.2	2,027	2.0	0.0	1.2	23.9	33.3	20.7	32.2	16.7	28.5	41.9	16.7	49.5	0.0	0.0	0.0
Total	629	160,711	100.0	94,821	3.1	3.1	1.8	22.3	23.6	16.2	35.3	23.7	34.7	39.3	37.8	47.3	0.1	0.7	0.1

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2017 - 2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Full-Scope Review																			
Corpus Christi AA	581	139,492	85.1	10,470	22.5	1.3	3.1	17.4	5.3	10.7	18.2	9.0	20.0	41.9	78.1	42.4	0.0	6.3	23.7
Limited-Scope Reviews																			
Austin AA	45	20,836	12.7	82,324	22.1	0.0	3.7	16.5	2.1	15.5	19.7	8.3	21.4	41.7	54.6	45.5	0.0	35.0	13.8
Victoria AA	3	383	0.2	2,027	23.2	0.0	4.1	16.8	0.0	12.5	18.2	0.0	19.8	41.9	66.7	38.1	0.0	0.0	25.5
Total	629	160,711	100.0	94,821	22.6	0.4	3.6	16.9	2.5	12.9	18.7	5.8	20.4	41.8	66.5	42.0	0.0	13.8	21.0

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2017 - 2019

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Full-Scope Review																			
Corpus Christi AA	20	6,896	33.3	6,968	3.3	0.0	2.4	29.4	30.0	28.2	35.7	50.0	33.2	31.2	20.0	36.1	0.3	0.0	0.1
Limited-Scope Reviews																			
Austin AA	20	29,466	33.3	53,410	7.0	0.0	7.3	12.5	30.0	13.3	33.4	40.0	33.7	45.8	30.0	44.9	1.3	0.0	0.8
Victoria AA	20	7,565	33.3	1,810	2.1	0.0	2.8	32.8	25.0	27.1	30.0	25.0	26.0	35.0	50.0	43.7	0.2	0.0	0.4
Total	60	43,927	100.0	62,685	6.3	0.0	6.6	15.1	28.2	15.5	33.7	38.3	33.6	43.7	33.3	43.6	1.1	0.0	0.7

Source: 2015 ACS Census; 01/01/2019 - 12/31/2019 Bank Data, 2019 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2017 - 2019

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Full-Scope Review											
Corpus Christi AA	20	6,896	33.3	6,968	82.1	45.0	44.0	4.7	55.0	13.2	0.0
Limited-Scope Reviews											
Austin AA	20	29,466	33.3	53,410	88.1	55.0	42.7	3.8	45.0	8.1	0.0
Victoria AA	20	7,565	33.3	1,810	80.7	60.0	36.4	5.1	40.0	14.2	0.0
Total	60	43,927	100.0	62,685	87.2	53.3	41.4	3.9	46.7	8.9	0.0

Source: 2019 D&B Data; 07/01/2017 - 12/31/2019 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%