



PUBLIC DISCLOSURE

August 07, 2023

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Inwood National Bank
Charter Number 15292

7621 Inwood Road
Dallas, TX 75209-4045

Office of the Comptroller of the Currency

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

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

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Overall CRA Rating

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

The following table indicates the performance level of Inwood National Bank (INB or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	(Name of Depository Institution) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			

** 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 the excellent level of Community Development (CD) lending, good lending activity, good geographic and income distribution of lending, and a substantial majority of the bank’s loans were made within the bank’s Assessment Area (AA).
- The Investment Test rating is based on the excellent level of investments and responsiveness to community development needs.
- The Service Test rating is based on the accessibility of branch offices and the relatively high level of CD services.

Lending in Assessment Area

A substantial majority of the bank’s loans were made within its AA.

The bank originated and purchased 86.8 percent of its total loans inside the bank’s AA during the evaluation period. This analysis was performed at the bank, rather than the AA level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The findings from this analysis factored into the overall analysis of the geographic distribution of lending by income level of the geography.

Table D - Lending Inside and Outside of the Assessment Area 2020-2021 Dallas MSA										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,493	79.7	381	20.3	1,874	484,981	75.7	155,897	24.3	640,878
Small Business	1,821	93.6	125	6.4	1,946	280,034	93.8	18,462	6.2	298,496
Total	3,314	86.8	506	13.2	3,820	765,015	81.4	174,359	18.6	939,374
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

Inwood National Bank, an intrastate Texas bank, is a wholly owned subsidiary of Inwood Delaware Corporation, which is wholly owned by Inwood Bancshares, Inc., a one-bank holding company. INB was organized on April 9, 1964, and is one of the largest independent, locally owned community banks in the area. INB has 14 banking offices in its AA. The main office is located approximately five miles north of downtown Dallas off Inwood Road and Lovers Lane. There are three other branches in the City of Dallas including the Galleria, Oak Lawn, and Pleasant Grove areas. Branches are also located in the communities of Commerce, Denton, Desoto, Duncanville, Garland, Richardson, Rowlett, Wylie, and Rockwall. The bank also has a branch office located in downtown Fort Worth. There have been no changes in locations; however, in 2021, the bank constructed a \$3.1 million bank-owned facility which replaced the leased space in the Pleasant Grove location. The bank has not experienced any acquisitions or mergers during the review period.

One of INB's banking offices is in a low-income census tract, six are in moderate-income tracts, two are in middle-income geographies, and five are located in upper-income census tracts. Full-service ATMs are situated on the main office and branch premises and offer 24-hour access. Branch hours and services do not vary in a way that inconveniences portions of the AA, particularly low- and moderate-income (LMI) individuals or geographies.

INB operates in one AA that is comprised of the entire counties of Collin, Dallas, Denton, Hunt, Rockwall, and Tarrant. These counties are in the Dallas-Plano-Irving TX Metropolitan Division (MD) and the Fort Worth-Arlington-Grapevine MD. Both the Dallas and the Fort Worth MDs comprise the Dallas-Fort Worth-Arlington, TX MSA (Dallas MSA). Combining both or part of the two MDs within the MSA meets the CRA regulation's technical requirements for an AA.

INB is a full-service financial institution that generates deposits and originates credit products including consumer, commercial, small business, and real estate loans. As of December 31, 2021, INB had \$4.3 billion in total assets, \$2.1 billion in total loans, and tier one capital of \$358.8 million. The bank's average loan-to-deposit ratio during the evaluation period was 63.7 percent. As of December 31, 2021, net loans represented 48.4 percent of total assets. The loan portfolio composition of loans was 16.3

percent residential, 78.4 percent commercial real estate (CRE), 5.1 percent commercial, and less than 1.0 percent consumer loans.

Deposit products include demand deposit accounts (both consumer and commercial), savings accounts, certificates of deposit and individual retirement accounts. In addition, INB offers a number of electronic banking services such as bill pay, internet banking, overdraft programs, peer-to-peer, mobile wallet, and remote deposit capture. INB offers an E-Checking account for no charge to customers who elect to receive their statements electronically. While INB originates residential mortgage loans and other consumer loans, management is strategically focused on originating CRE and commercial loans.

INB provides a variety of services to LMI individuals and to community development organizations that serve LMI individuals or communities located within its AA. Services include credit counseling and financial services education on affordable housing and first-time homebuyer programs for LMI individuals. Training, financial services education, and guidance are provided during the LMI applicant's mortgage financing documentation processes. INB also works with a non-profit CD organization to offer a payday alternative loan program in which the LMI borrower is offered less burdensome repayment terms. In addition, several INB employees are involved with local non-profit organizations focused on serving LMI individuals and communities.

INB faces significant competition in originating loans and attracting deposits in its AA. This competition stems from other banks, credit unions, and mortgage banking companies with regional and national footprints. Many of the financial services providers operating in INB's AA are significantly larger banks.

INB has no affiliate or operating subsidiary activities considered when evaluating the CRA performance. There are no legal or financial factors impeding the ability to help meet the credit needs of its AA. The rating at its previous CRA PE dated June 1, 2020, was "Outstanding".

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation (PE) assesses the bank's performance under the Lending, Investment, and Service Tests. In evaluating the bank's lending performance, we reviewed residential mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA), small loans to businesses as reported under the CRA Small Business data, and CD loans. We also evaluated CRA qualified investments including donations and grants as well as retail and CD services. The bank reported some farm loans, but there was not enough activity to provide for a meaningful analysis.

The evaluation period was January 1, 2020, through December 31, 2021. During this examination, we shortened the review period to only two years due to small business lending peer data for 2022 not being available. During the next CRA examination, we will include 2022 in our review period. Our conclusions related to CD loans, qualified investments including donations, and CD services were based on the number and dollar amounts made during the evaluation period. In addition, we considered the level of innovation, complexity, and responsiveness to community credit needs.

For geographic and borrower distribution analyses, loans originated in 2020 and 2021 are compared to the 2015 American Community Survey (ACS) Census data for mortgages and the 2021 Dun & Bradstreet (D&B) Data for loans to small businesses.

Selection of Areas for Full-Scope Review

For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each 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.

INB has one AA in the State of Texas. This AA has been defined as the Dallas MSA, which is comprised of parts of two MDs. This AA has been selected for a full-scope review. There were no limited-scope AAs in Texas.

Ratings

The bank’s overall rating is based on the performance in the State of Texas. The state rating is based on performance in the bank’s AA. Refer to the “Scope” section under the State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

For the geographic and borrower distribution of loans under the Lending Test, consideration was given to the number of loans and dollar volume of loans originated in each category. Small business lending received the most weight and then home mortgage loans were considered.

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 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 bank (or any affiliate whose loans have been considered as part of the institution’s lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Texas

CRA rating for the State of Texas¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflected good responsiveness to meeting the credit needs of the bank's AA.
- A good geographic distribution of loans and a good distribution of loans by the income level of the borrower given performance context.
- The substantial majority of lending was inside the bank's AA.
- An excellent level of CD loans that was responsive to community needs given the bank's capacity and opportunities in its AA. The level of CD loans had a significant positive impact on the overall Lending Test.
- Extensive use of innovative and flexible loan products to assist LMI borrowers.
- An excellent level of qualified investments, including grants and donations.
- Retail delivery systems, such as bank branches are accessible to essentially all portions of the AA, including LMI geographies.
- The bank provided a relatively high level of CD Services that were responsive to community needs.

Description of Institution's Operations in Texas

The bank operates in one AA in the State of Texas. INB's primary business focus is business and home mortgage loans. Competitors include other local community banks and some of the United States' largest banks that have a nationwide footprint as well as credit unions and nonbank financial entities that compete for residential, business, and consumer loans. Community credit needs in the full-scope AA were determined by reviewing recent housing and demographic information, CRA PEs from other banks

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.]

operating in the bank's AA, and a review of community contacts with organizations that provide services within the full-scope AA.

Dallas MSA

The bank has its main office and 13 branch offices in the Dallas MSA. The AA is comprised of the entire counties of Dallas, Tarrant, Denton, Collin, Rockwall, and Hunt. The AA contains 1,205 census tracts: 13.7 percent are low-income CTs, 26.3 percent are moderate-income CTs, 26.2 percent are middle-income CTs, 33.2 percent are upper-income CTs, and 0.6 percent are unknown. The AA contains nine underserved or distressed CTs.

According to Moody's Analytics, the Dallas economy indicates that job growth has slowed significantly and is now no higher than the national pace. Layoffs have occurred in core financial and professional services mostly due to the decline in the housing market although the unemployment rate has remained stable at 3.5 percent. Homebuilding is expected to slow in coming years mostly due to affordability, but the Dallas area should see an increase in apartment developments.

Owner-occupied housing units in the AA total 2,358,766. The majority of the housing units are in middle and upper-income geographies. Only 12 percent are in low-income CTs and 24.6 percent in moderate-income CTs. The percentage of families below the poverty level in the Dallas MSA is 11.6 percent and the median family income is \$71,149 in the Dallas Plano Irving MD and \$69,339 in the Fort Worth Arlington Grapevine MD.

To help identify needs and opportunities in the AA, the OCC reviewed several community contacts in the Dallas MSA. The City of Dallas Office of Economic Inclusion promotes economic development and investment in resources for the City of Dallas. The organization provides resources and outreach efforts to bolster investment in Dallas County. Additionally, it facilitates financing of economic development throughout the county including strategic ecosystem efforts aimed at connecting small businesses with resources and organizations throughout the county.

The community contact indicated that the greatest long-term opportunity for participation by local financial institutions is assisting with delivering financial literacy and education in Dallas County. The organization has identified a dramatic gap between the financial capabilities and know-how of small business owners to not only secure credit through financial institutions, but also to develop adequate financial planning and management strategies to support short- and long-term growth. In addition, the community contact identified a need for business loans that are smaller in dollar amount than traditional small business loans as well as credit products extended to new businesses that do not yet have an established credit profile.

The second community contact is the Tarrant County Community Development and Housing Department. This department develops and administers community development and housing programs of behalf of the Urban County Consortium and the Tarrant County Commissioners Court to meet the county's housing and community development needs. Programs are funded under several grants. The community contact indicated that there is a need for affordable housing in Tarrant County due to the rising housing prices and taxes. He also indicated that credit needs for small businesses were not being fully met by banks in the area.

The following tables depict the demographic information for the full-scope AA in Texas.

Dallas MSA

Table A – Demographic Information of the Assessment Area						
Dallas MSA 2020 - 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,205	13.7	26.3	26.2	33.2	0.6
Population by Geography	6,167,183	11.6	25.9	27.9	34.6	0.1
Housing Units by Geography	2,358,766	12.0	24.6	28.4	34.7	0.2
Owner-Occupied Units by Geography	1,275,347	5.5	20.1	29.4	44.9	0.1
Occupied Rental Units by Geography	902,060	19.5	30.3	27.7	22.1	0.3
Vacant Units by Geography	181,359	21.2	28.7	25.2	24.6	0.3
Businesses by Geography	740,942	7.0	18.2	26.1	48.0	0.7
Farms by Geography	12,467	4.8	16.7	29.8	48.2	0.5
Family Distribution by Income Level	1,496,213	23.7	16.4	18.0	42.0	0.0
Household Distribution by Income Level	2,177,407	24.0	16.5	17.7	41.8	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$71,149	Median Housing Value			\$179,168
Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX		\$69,339	Median Gross Rent			\$981
			Families Below Poverty Level			11.6%
<i>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.</i>						

Scope of Evaluation in the State of Texas

The evaluation period for our review was January 1, 2020, through December 31, 2021. Our conclusions related to CD loans, qualified investments including donations, and CD services were based on the number and dollar amounts made during the evaluation period. In addition, we considered the level of innovation, complexity, responsiveness to community credit needs, and the degree to which these instruments are not routinely provided by private investors. Qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are addressed in this evaluation.

As discussed earlier, the Dallas MSA was selected for a full-scope review. This is the bank’s only AA. There are no limited-scope areas to review. Refer to the table in Appendix A for a list of all AAs under review.

Conclusions in Respect to Performance Tests in the State of Texas

Lending Test

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Dallas MSA is excellent. The level of CD lending had a significantly positive impact on lending performance when considering the impact of responsiveness and initiatives during the evaluation period, including during the coronavirus pandemic.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Dallas MSA	1,493	1,821	9	52	3,375	100	100

Dollar Volume of Loans (000's)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Dallas MSA	\$484,981	\$280,034	\$1,421	\$124,554	\$890,990	100	100

INB's lending activity in the Dallas MSA is good relative to its capacity based on deposits, competition, market presence, and business strategy.

Based upon 2021 Deposit Market Share data, INB has a 0.43 percent market share of deposits, ranking 19th amongst 213 financial institutions in the AA. The proportion of reported bank home mortgage loans for 2021 was less than the proportion of bank deposits in the Dallas MSA. The bank's home mortgage lending market share in the Dallas MSA of 0.17 percent was less than the bank's deposit market share of 0.43 percent. The bank ranked 129th of the 1059 home mortgage lenders in the Dallas MSA. The top five mortgage lenders had 18.9 percent of the total market share. Given the competition from the other reporting lenders in the AA, and the bank's market share and lender rankings, overall home mortgage lending activity was good.

In 2021, the proportion of the reported bank's small business loans was higher than the proportion of the bank's deposits in the Dallas MSA. The bank's small business lending market share in the Dallas MSA was 1.07 percent while the deposit market share was 0.43 percent. According to 2021 peer data, INB ranked 33rd of 227 small business lenders in the Dallas MSA. The five largest business lenders held 31.4 percent of the total market share. The small business lending activity was good given the bank's market share and ranking when compared to its deposit market share and small business lending competition within the AA.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

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

In 2020-21, the bank's home mortgage lending in low-income geographies was somewhat lower than the owner-occupied housing units and was near the aggregate lending in low-income geographies. For moderate-income geographies, the bank's lending was lower than the owner-occupied housing units and was somewhat lower than the aggregate lending.

The bank's main strategy for low- and moderate-income mortgages has been through its relationship with non-profit homebuilders. During 2020 and 2021, inflation in the housing construction made it difficult for homebuilders to deliver affordable housing. The bank continued its relationship with non-profit builders; however, construction paused during a portion of the evaluation period due to the coronavirus pandemic.

Small Loans to Businesses

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

In 2020-2021, the bank's small business lending in low and moderate-income geographies exceeded both the percentage of businesses located in low- and moderate-income geographies and the percentage of aggregate lending to small businesses.

Lending Gap Analysis

No unexplained, conspicuous gaps in lending were identified. We evaluated lending distribution in the full-scope AA to determine if any unexplained conspicuous gaps existed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

The distribution of loans to LMI individuals in the AA is good. Refer to Table P in the state of Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In 2020-21, the bank's home mortgage lending to low-income borrowers was lower than the percentage of families identified as low-income and was equal to as the aggregate lending to low-income borrowers. For moderate-income borrowers, the bank's mortgage lending was somewhat lower than the percentage of families identified as moderate-income and the aggregate lending to moderate-income borrowers.

Small Loans to Businesses

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

In 2020-21, the bank's loans to businesses with revenues less than or equal to \$1 million was somewhat lower than the percentage of businesses identified as having revenues less than or equal to \$1 million but exceeded the aggregate percentage of lending to these businesses.

Community Development Lending

The bank is a leader in making CD loans.

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

Dallas MSA

The level of CD lending in the Dallas MSA had a significantly positive impact on the overall Lending Test conclusions relative to lending opportunities in the area during 2020 and 2021. During the evaluation period, INB originated 52 CD loans totaling \$124.5 million, or 34.7 percent of tier 1 capital. These loans represented excellent responsiveness to identified needs in the area, particularly affordable housing and community development.

The CD loans are categorized by the four CD criteria, as follows. Proceeds of these loans all positively impacted LMI individuals, families, and/or geographies in the AA. Following are examples by category with some of the borrowers noted:

- Six loans totaling \$1.2 million financed affordable housing for LMI individuals and families. These affordable housing loans provided funds to construct and renovate single-family residences that will provide affordable housing to LMI families. The bank has relationships with Community Development Housing Organizations (CDHO) in the City of Dallas, the City of Rockwall, and with various developers who engaged in facilitating and providing affordable housing, much of which was located in LMI census tracts designated for development and neighborhood revitalization.
- Four loans totaling \$231,352 provided community services. These community service loans financed lines of credit or other loans to established non-profit organizations, one of which provided youth and family services including after-school programs, summer and holiday camps, sports leagues, and mentorship curriculum.
- 36 loans totaling \$105.9 million facilitated economic development. These economic development loans provided funds to acquire a shopping center and an industrial warehouse in LMI tracts which will help support job creation, retention, and improvement.
- Six loans totaling \$17.2 million financed revitalization/stabilization. Proceeds for many of these revitalization loans were used for purchasing, renovating, and/or improving commercial and multifamily properties in LMI tracts and Texas Enterprise Zones.

During the evaluation period, the bank made 1,694 Paycheck Protection Program loans totaling \$292.8 million in response to the pandemic. Thirty of these loans also qualified for CD credit activity and are included in the total amount of CD loans mentioned above.

Broader Statewide

During the evaluation period, the bank made seven broader statewide CD loans totaling \$27.5 million or 7.7 percent of tier one capital. These loans did not have a purpose, mandate, or function to serve the AA.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs.

INB offers flexible loan products such as the INB First-Time Homebuyer Mortgage. The bank developed this product in 2002 in response to needs expressed by non-profit community development organizations. The program offers no origination fee, no points, no private mortgage insurance requirement, and a 30- year fixed rate term. The bank originated five of these loans totaling \$490,085 with \$125,166 in down payment assistance. During 2020 and 2021, the bank stayed in close contact with its 79 first time home buyers offering counseling during the time of reduced employment. The bank processed coronavirus pandemic deferrals at the request of 13 of the bank's first-time home buyers. The bank also helped facilitate mortgage payment assistance for 20 first-time home buyers in excess of \$80,000.

INB continues to partner with an organization by providing an innovative payday/auto title alternative loan program and an emergency family loan program. The Mini Loan Program (MLP) was fully launched in 2015. INB provides low interest, fully amortizing monthly payment loans at a low interest rate for up to 12 months, with no closing costs. There is no minimum loan amount and borrowers may sign loan documents at any of INB's branch locations or electronically. The emergency loan program provides borrowers emergency funds for events such as urgent home repairs, medical bills, and family funerals, among other things. During 2020-2021, the bank originated 62 loans totaling \$119,457. None of the loans were larger than \$4,000.

As a member bank of the Federal Home Loan Bank (FHLB) of Dallas, INB participated in the following FHLB grant programs related to lending:

Homebuyer Equity Leverage Partnership (HELP)

Through member institutions, HELP assists low-income-qualified, first-time homebuyers with down payment assistance and closing costs. FHLB Dallas disburses HELP funds to members on a first come, first serve basis, one homebuyer at a time. During the coronavirus pandemic, the FHLB saw a drop in overall demand for HELP funds as construction projects were placed on pause by most builders.

Affordable Housing Program (AHP)

AHP funds are intended to assist FHLB Dallas members in financing the purchase, construction and/or rehabilitation of owner-occupied, rental or transitional housing, as well as housing for homeless individuals in their community. AHP funds must be used to benefit households with income at or below

80 percent of the median income for the area. AHP applications are scored by the FHLB and grants awarded in order of their score until the funds set aside for this program have been extinguished. In 2020, the bank assisted in the development of and sponsored one AHP grant application for a provider of affordable housing. The applicant was awarded \$160,000 in AHP funds to be used for the construction of 16 affordable housing units.

Investment Test

INB'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, INB's performance in the Dallas MSA is excellent. The bank 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. INB exhibits excellent responsiveness to credit and community economic development needs, and occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Dallas MSA	96	22,614	99	13,143	195	100.0	35,757	100.0	2	966
Totals	96	22,614	99	13,143	195	100.0	35,757	100.0	2	966

* 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.

Performance in the AA s excellent considering the volume of deposits in the AA and the impact of the investments. During the evaluation period, INB made 195 qualified investments and donations in the Dallas MSA totaling \$35.8 million. The investments included the following:

- Of the total investments, \$4.0 million was a current period mortgage-backed security (MBS). Ten prior period and the one current period GNMA, FNMA, and FHLMC MBSs helped support the affordable housing needs of LMI residents in the Dallas MSA. A majority of the loans in the MBS pools were loans to LMI families who make less than 80 percent of the median family income.
- An additional \$7.9 million in four Fort Worth ISD bonds during the current period. Five prior period bonds and four various independent school districts (ISD) located in the Dallas MSA. The bond proceeds were primarily used to construct several new schools, add instructional space to existing schools, renovate, and acquire equipment and buses. The majority of students in each ISD are economically disadvantaged as measured by the free and reduced lunch program.
- INB funded \$416 thousand of a \$1 million in a current equity investment with the Lone Star New Markets. The purchase of this partnership is to seek returns and capital appreciation for its partners by providing investment capital for persons residing in or otherwise serving low-income

communities. The partnership focuses primarily on investing in securities of qualified active low-income community businesses that operate in or are willing to expand operations to low-income communities located within the state of Texas. Moreover, INB funded \$618 thousand of a \$1 million in the Valesco Fund II, LP equity investment. The fund was created to make debt and private equity investments in small and lower middle market businesses. The fund is a licensed Small Business Investment Company which allowed it to issue Small Business Administration debentures to leverage the fund's private capital.

- During the evaluation period, INB made 92 donations totaling \$256,200. There were 35 affordable housing donations totaling \$94,300 to organizations that provide homeownership opportunities and home buyer services to LMI families and individuals. There were 63 community service donations totaling \$182,600. INB's donations primarily supported non-profit organizations that provide food, clothing, and shelter for those in need, job training, education and life skills, assistance referrals and health care services for LMI individuals. Also, there were five donations totaling \$11,800 to various organizations that provide economic development opportunities.

As a member bank of the FHLB of Dallas, INB has participated in the following FHLB grant programs related to donations:

Housing Assistance for Veterans (HAVEN)

HAVEN funds assist with necessary modifications to homes of U.S. veterans and active-duty, reserve or national guard service members who became disabled as a result of their military service since September 11, 2001. Alternatively, the funds can be awarded to Gold Star Families that were impacted during this time frame for home repairs or rehabilitation. The funds are disbursed on a first come, first serve, homeowner-by-homeowner basis. INB partnered with a local non-profit organization to secure HAVEN grants totaling \$16,979 for two LMI disabled veterans during the evaluation period.

Disaster Rebuilding Assistance Program (DRA)

DRA was established to provide subsidy funds for the repair and rehabilitation of owner-occupied housing units affected by FEMA declared disaster within the FHLB Dallas District. INB partnered with a local non-profit organization and sponsored two DRA applications for LMI households totaling \$18,759 during the evaluation period.

Partnership Grant Program (PGP)

In response to the coronavirus pandemic, the FHLB Dallas allocated a total of \$2.3 million to PGP funds in 2020. This program provided a 5:1 match of member contributions for grants that helped promote and strengthen relationships between Community Based Organizations (CBO) and FHLB Dallas members. In 2020, INB sponsored five CBOs in this program for a total of \$7,500, all of whom provide affordable housing. Four of the five applications were selected and each CBO received a total of \$9,000 (\$1,500-INB, \$7,500-FHLB). In 2021, FHLB's commitment returned to the traditional 3:1 match. INB sponsored two PGP applications totaling \$5,000. One of the two applications was selected by the FHLB and the CBO received a total of \$10,000 (\$2,500-INB, \$7,500-FHLB).

Special Needs Assistance Program (SNAP)

Through member institutions, SNAP provides subsidies for the repair and rehabilitation of owner-occupied housing of eligible special-needs individuals. During the evaluation period, INB partnered with two local non-profit organizations and successfully sponsored 12 SNAP applications. In total, \$66,286 was awarded and distributed to LMI households.

Broader Statewide or Regional Areas

INB had 33 investments totaling \$31.4 million that benefited broader statewide areas.

In the broader statewide area, INB continues to hold two prior period bonds and 32 current period bonds totaling \$32.2 million to various ISDs located in distressed or underserved middle-income areas. The bond proceeds were primarily used to construct, renovate or convert middle school and high school facilities where the majority of students are economically disadvantaged as measured by the free and reduced lunch program.

INB funded \$631 thousand of a \$750 thousand commitment in a current period equity investment with the Independent Bankers Capital Fund III (ICBP). IBCP raises private capital for the purpose of making loans and purchasing subordinated debenture and equity securities issued by established lower-middle-market companies located within the southern United States, with a focus on investing in Texas companies. The investment objective of this partnership is to generate investment returns over a five-to-ten-year period, principally from the collection of interest on debt investments in small businesses and the realization and distribution of capital gains from equity investments in small business investments.

Service Test

The INB’s performance under the Service Test in Texas is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Dallas MSA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank’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
Dallas MSA	100	14	100	7.1	42.9	14.2	35.7	11.6	25.9	27.9	34.6

The bank’s delivery systems are accessible to essentially all portions of the Dallas MSA. INB has 14 full-service branches in the MSA. The bank has one branch in a low-income geography and six branches in moderate-income geographies. The percentage of the bank’s branch offices located in low-income

geographies is lower than the percentage of the population within the low-income geographies. The percentage of the bank’s branch offices in moderate-income geographies exceeds the percentage of the population within the moderate-income geographies. All branch locations have deposit-taking ATMs onsite. ATM distribution is consistent with the bank’s branch distribution. Management complements its traditional service delivery methods with certain alternative delivery processes, including online banking, telephone banking, and mobile banking services.

Distribution of Branch Openings/Closings						
		Branch Openings/Closings				
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Dallas MSA	0	0	0	0	0	0

INB did not open or close branches during the evaluation period. This has not adversely affected the accessibility of its delivery systems. Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals.

Community Development Services

The bank provided a relatively high level of CD services.

INB provided a good level of CD services that are responsive to the needs of the communities in the AA. In the Dallas MSA, 13 bank officers and employees provided their expertise to 27 different CD organizations for a total of 2,067 hours. During the evaluation period, eight of the 13 bank officers and employees volunteered in leadership positions. INB’s directors, senior management, and officers have provided outreach services to a variety of community development organizations, nonprofit, and to small businesses within its community. Examples of the bank’s CD services include:

- A bank employee served as INB's representative for the MLP. He helped develop the program in 2015 and has been working closely with the organization’s MLP leader since that time. He worked closely with MLP borrowers from application until closing, providing one-on-one financial literacy guidance. INB originated 46 MLP loans during evaluation period, which accounted for 46 hours of CD service.
- A bank Board member and treasurer provided technical and financial expertise by sitting on the Board of Directors of a non-profit clinic. The organization is a community-based 501 (c) 3 non-profit organization founded in 2013 to address the lack of health care for individuals in the Rockwall community who cannot afford to pay for medical care. The clinic provided quality primary and allied healthcare and education services to the community, regardless of ability to pay.
- A bank employee provided financial expertise by serving on a non-profit organization. This organization served the community of Johnson County and residents within the Burleson ISD by providing food, limited financial assistance, financial counseling, and has a free medical clinic.

- A bank Board member and treasurer provided technical and financial expertise by sitting on the Board of Directors of a non-profit organization. The organization offered qualified social and economic services to the residents of north central Texas. The mission of the organization is to create lives of independence and build a stronger local community.
- Two bank employees provided technical and financial assistance to a non-profit organization. The organization's mission is to care for the poor, feed the hungry, and shelter the homeless. One of the same employees also attended trustee meetings for this organization.

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:	1/1/2020 – 12/31/2021	
Bank Products Reviewed:	Home mortgage and small business loans. Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Texas		
Dallas MSA	Full-scope	Assessment area includes all of Dallas, Rockwall, Tarrant, Collin, Denton, and Hunt Counties.

Appendix B: Summary of State Ratings

RATINGS INWOOD NATIONAL BANK				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
	Outstanding	Outstanding	High Satisfactory	Outstanding
State:				
Texas	Outstanding	Outstanding	High Satisfactory	Outstanding

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Dallas MSA	1,493	484,981	100.0	340,501	5.5	2.8	2.9	20.1	7.9	12.0	29.4	24.8	30.3	44.9	64.3	54.6	0.1	0.2	0.2		
Total	1,493	484,981	100.0	340,501	5.5	2.8	2.9	20.1	7.9	12.0	29.4	24.8	30.3	44.9	64.3	54.6	0.1	0.2	0.2		

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2020-2021		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Dallas MSA	1,493	484,981	100.0	340,501	23.7	3.3	3.3	16.4	9.4	12.6	18.0	19.5	18.2	42.0	62.4	44.0	0.0	5.4	21.8		
Total	1,493	484,981	100.0	340,501	23.7	3.3	3.3	16.4	9.4	12.6	18.0	19.5	18.2	42.0	62.4	44.0	0.0	5.4	21.8		

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2020-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Dallas MSA	1,821	280,034	100.0	219,644	7.0	9.4	7.3	18.2	22.5	19.1	26.1	26.5	25.2	48.0	40.9	47.8	0.7	0.7	0.7		
Total	1,821	280,034	100.0	219,644	7.0	9.4	7.3	18.2	22.5	19.1	26.1	26.5	25.2	48.0	40.9	47.8	0.7	0.7	0.7		

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Dallas MSA	1,821	280,034	100.0	219,644	88.4	49.7	43.0	3.6	43.5	8.0	6.8		
Total	1,821	280,034	100.0	219,644	88.4	49.7	43.0	3.6	43.5	8.0	6.8		

*Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%*

