



PUBLIC DISCLOSURE

October 3, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

American Bank, National Association
Charter Number: 15820

100 American Bank Plaza
Corpus Christi, TX 78475

Office of the Comptroller of the Currency
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” or the “bank”) with respect to the Lending, Investment, and Service Tests:

Performance Levels	American Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			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:

Lending Test

- Lending levels reflect good responsiveness in all of the bank’s AAs. In all AAs, the percentage of loans was near to the percentage of AA deposits. In the Austin AA, loan volume was higher than the percentage of deposits. American is one of the top small business lenders in its largest Corpus Christi Assessment Area (AA). During most of the evaluation period, the percent of the bank’s small loans to businesses by dollar volume, exceeded its percent of deposit market share among other depository financial institutions.
- The bank originated a substantial majority of its loans within its AAs.
- Geographic and borrower-income distributions are adequate.
- The bank has excellent levels of community development (CD) loans in its largest AAs, which had a positive impact on the Lending Test.

Investment Test

- The bank has a good volume of qualified CD investments made during the evaluation period and investments made during prior evaluation periods that remained outstanding and continue to provide benefit to various communities.
- The bank has demonstrated good responsiveness to credit and community economic development needs. The bank has occasionally used innovative or complex investments to support CD initiatives.

Service Test

- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in most of the bank's AA. Alternative delivery systems expand access to retail banking services.
- The bank provided a relatively high level of CD services.

Lending in Assessment Area

A substantial majority of American's loans are in its assessment areas (AAs).

The bank originated and purchased 80 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. Farm loans are not a primary strategic focus for the bank and the volume is limited, but these loans are also included in the table below as reported on the CRA Loan Application Register (LAR). Most of the bank's home mortgage loans inside the AA were in the largest Corpus Christi AA at 71 percent and in the Austin AA at 21 percent. Additionally, most of the small business loans were in the Corpus Christi AA at 72 percent followed by the Austin AA at 17 percent. Loans inside the AA are considered in the geographical distribution analysis under the Lending Test.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	963	85.3	166	14.7	1,129	317,303	78.7	85,660	21.3	402,963
Small Business	2,838	79.9	712	20.1	3,550	465,907	80.3	114,369	19.7	580,276
Small Farm	43	50.0	43	50.0	86	5,305	63.1	3,107	36.9	8,412
Total	3,844	80.7	921	19.3	4,765	788,515	79.5	203,136	20.5	991,651

Description of Institution

American is a privately owned single state bank, headquartered in Corpus Christi, Texas. American was founded in 1970. The bank is a wholly owned subsidiary of American Bank Holding Corporation, a one-bank holding company, also based in Corpus Christi. American has one affiliate, ABNA Investment Company, which was established to provide equity investments into a small business investment company (SBIC), Blue Sage Capital II, LP. We evaluated the SBIC affiliate as part of the Investment Test. We did not review any other affiliate or subsidiary activities of American or related bank holding companies in this Performance Evaluation (PE). The bank's affiliate activities do not affect American's capacity to lend or invest in its AAs.

American operates 18 full-service locations, including eight in the Corpus Christi AA, seven in the San Antonio AA, one in the Austin AA, and two in the Victoria AA. ATMs are available at each full-service banking center with five remote ATMs located throughout the Corpus Christi AA. In 2018, American also opened two loan production offices (LPOs) in Houston and one in San Antonio. The San Antonio

LPO converted to a full-branch office in 2020. American further expanded the bank's presence in the San Antonio market with the acquisition of the former community bank, TexStar National Bank in October of 2022, adding six branches in the San Antonio AA.

At year-end 2022, American reported total assets (TA) of \$2.4 billion, which is an increase from \$1.57 billion reported at the end of the previous evaluation period at year-end 2019. In 2022, the bank also reported Tier 1 capital of \$216 million and a leverage capital ratio of 8.84 percent. Net loans totaled \$1.5 billion and represented 64 percent of total assets and 72 percent of total deposits. The bank's loan portfolio consisted of commercial real estate, construction/development loans secured by real estate, and commercial and industrial loans (82 percent), residential real estate (14 percent), consumer loans (2 percent), farmland and agriculture related (1 percent), and other loans (1 percent).

American primarily focuses on commercial lending and is a preferred lender with the Small Business Administration (SBA). The bank offers a variety of loan products for the commercial, small business sector including commercial & industrial loans, commercial real estate, commercial construction and development, commercial lines of credit, and equipment financing. Commercial deposit products include commercial checking, savings, certificate of deposit accounts, and debit and credit cards. American provides consumer and commercial services through its website and mobile banking product. Commercial related digital business banking services include ACH origination, online wires, positive pay, mobile deposits, and bill pay. Additionally, American offers treasury management services to their commercial customers which includes, receivables, payables, fraud prevention.

The bank also offers a full range of consumer loans and deposit products as well as trust, and brokerage services. Investment and brokerage services are available through a referral agreement with Ameriprise Financial Institutions Group as American Investment Services (AIS). Consumer lending products include both secured and un-secured personal loans, consumer lines of credit, construction loans, mortgage loans, lot loans, refinances, home improvement loans, home equity loans, and credit cards through a referral agreement with Elan Financial Services. Consumer deposit products include checking, savings, certificate of deposits, retirement/IRA as well as debit and credit cards. The bank also provides telephone banking, online applications for mortgage loans, and digital banking services that include mobile deposits, external account transfers, Zelle and bill payment services.

The bank has 4 AAs and one rating area, which is the state of Texas. The bank's AAs include a portion of the Corpus Christi Combined Statistical Area (CSA), portions of the San Antonio Metropolitan Statistical Area (MSA), portions of the Austin-Round Rock-Georgetown MSA, and the Victoria MSA. Counties in the bank's Corpus Christi AA include Nueces, San Patricio, and Aransas counties; the Austin AA includes Hays, Travis, and Williamson, counties; the Victoria AA includes Victoria and Goliad counties. The San Antonio AA includes Bexar and Comal counties. The bank changed their San Antonio AA in 2022 to include Comal County after the acquisition of TexStar. For most of the evaluation period, 2020-2021, the San Antonio AA only included Bexar County.

The prior performance evaluation (PE) dated September 14, 2020, assigned an overall "Satisfactory" rating to the bank'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 the AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period covered lending, investment, and community development activities from January 2, 2020, through December 31, 2022. Examiners considered the bank's small business and home mortgage loans, as well as CD lending. The volume of farm loans was too small for a meaningful analysis, although examiners did consider these loans in the analysis of lending volume. The evaluation also includes consideration of CD investments, donations, services, and retail delivery services.

Examiners relied upon records provided by the bank, public loan and financial information, demographic data from the U.S. Census Bureau, Dun & Bradstreet (D&B), community contacts, and loan information reported pursuant to the Home Mortgage Disclosure Act (HMDA) and CRA (small business lending data).

This evaluation period covered two census periods. For analysis of mortgage lending activity, examiners compared the bank's performance to aggregate HMDA data during the relevant time periods and the relevant census period. For lending activity during 2020-2021, examiners compared the bank's performance to the 2015 American Community Survey (ACS) census data and aggregate HMDA lender data. For mortgage lending activity during 2022, examiners compared the bank's performance to the aggregate HMDA data and the 2020 census data, which the FFIEC released in 2022. Examiner analysis of small business lending in 2020-2021 focused on comparison of the bank's performance with 2021 D&B data and comparison to the 2021 aggregate CRA data. In 2022, examiners considered small business lending in comparison to the 2022 D&B data and the 2022 aggregate CRA data.

Selection of Areas for Full-Scope Review

This evaluation assessed performance in Texas, which is the only state where the bank has offices and AAs. Examiners selected two of the bank's AAs within Texas for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

On March 6, 2020, the Office of Management and Budget (OMB) revised delineations for many MSAs, effective immediately. As a result, examiners analyzed lending performance in the affected AAs based upon the revised delineations, which only impacted the bank's Corpus Christi AA. In the revised delineations, Aransas County a non-MSA, Micropolitan Statistical Area, was included as part of the Corpus Christi Combined Statistical Area (CSA). Aransas County is adjacent to the Corpus Christi MSA. In prior evaluation periods, depending on changes by OMB, this county has been evaluated separately and as part of the Corpus Christi MSA. Because the OMB changes covered most of the entire evaluation period, examiners considered the revised AA delineations for the entire period.

Examiners selected the bank's Austin and Corpus Christi AAs for full-scope review. Refer to the "Scope" section under the State Rating section for details regarding how full-scope AAs were selected. Also, refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Innovative or Flexible Lending Products

The institution makes use of innovative and/or flexible lending practices in order to serve AA credit needs. The bank continues to participate in several programs aimed at assisting LMI borrowers and works with local organizations to develop opportunities to reach these individuals.

Affordable Mortgage Product (AMP) - To improve lending to LMI individuals and geographies, the bank introduced AMP in August of 2019. The AMP is designed for borrowers who are either purchasing or refinancing a home located in an LMI tract or whose income is at or below 80% of the area median income. The product offers lower down payments, longer term fixed rates, and has more flexible underwriting requirements for debt to income (DTI) and credit scores. The product is available in all of the bank's AAs, although most of the loans have originated in the Corpus, San Antonio, and Austin AAs. Over the evaluation period, the bank originated 51 AMP loans totaling \$8.6 million. The program has continued to receive positive feedback and in October 2022, management increased the portfolio limit for AMP loans to \$20 million.

Veterans Affairs (VA) and Federal Housing Administration (FHA) - American offers loan programs available through the VA and FHA. VA loans help servicemembers, veterans, and eligible surviving spouses to become homeowners. The VA guarantees a portion of the loan enabling banks to provide eligible borrowers more favorable terms. VA loans have no down payment requirement, competitively low interest rates, limited closing costs, no requirement for private mortgage insurance, and the VA home loan is a lifetime benefit. FHA insured loans allow down payments as low as 3.5 percent of the purchase price, low closing costs, and flexible credit qualifications. During the evaluation period, the bank originated 16 VA loans, 14 of which were in the bank's AAs totaling \$3.9 million. The bank also originated 21 FHA loans totaling \$4.4 million.

Small Business Administration (SBA) - During the COVID-19 pandemic, American, demonstrated flexibility in lending and services through participation in the SBA's Paycheck Protection Program (PPP). As an SBA Lender since 1979, the bank originated 1,122 PPP loans in 2020 totaling \$162 million which assisted in the retention of over 18 thousand employees, of these loans 12 are reported as CD loans totaling \$17.7 million. In the second round of the Pandemic in 2021, American originated 474 PPP loans totaling \$71 million, which assisted in the retention of 6.9 thousand employees as the pandemic continued. Of these 2021 PPP loans, five are reported as CD loans totaling \$ 7.5 million. During the pandemic in 2020-2021, the bank also offered 90-day payment deferrals and payment date changes for commercial and consumer loan borrowers, and interest only payments for the bank's consumer small dollar loan product. American processed payment deferrals for 306 loans, including three for the bank's AMP product. The bank did not report late payments until 90 days past due. Also, during this period, American implemented automatic fee waivers for certain depository services, and limit increases for mobile banking depositors and external transfers.

Ratings

The bank's overall rating is based upon performance in all the bank's Texas AAs. Refer to the "Scope" section under the State Rating section for details regarding how these areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c), 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 Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (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 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 Texas: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the credit needs in the bank's AAs.
- American originated a substantial majority, 80 percent, of its loan within the AAs.
- The bank exhibited an adequate geographic distribution of loans within the AAs.
- The bank exhibited an adequate distribution of loans to borrowers of different income levels and to businesses of different sizes.
- American was a leader in originating CD loans in the bank's largest AAs, which had a significantly positive impact on the bank's lending test rating.
- The bank had a good level of qualified CD investments and donations.
- Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AAs.
- The bank provided a relatively high level of CD services.

Description of Institution's Operations in Texas

American operates in four AAs in Texas. At year-end 2022, American operated 18 service centers including the main office in Corpus Christi. This total includes the six new branches acquired through the TexStar acquisition. Of all 18 branches, eight (44 percent) are in the Corpus Christi AA, seven (44 percent) are in the San Antonio market, one branch (6 percent) is in the Austin market and two branches (11 percent) are the Victoria/Goliad market. Most deposits and lending activity are in the Corpus Christi AA totaling approximately 79 percent of bank deposits and 72 percent of lending activity. Prior to the acquisition of TexStar in October 2022, the next largest AA from a deposit and lending perspective was the Austin AA with 8 percent of the total deposits and 18 percent of loan activity. However, after acquisition of TexStar, the San Antonio AA became the second largest AA by number of branches and deposit volume with 18 percent of total bank deposits.

American's primary focus is commercial lending. American faces strong competition in their markets from local community banks, credit unions, mortgage companies, regional banks, and large national banks. Some of the top competitors their assessment areas include Bank of America, Wells Fargo, Prosperity Bank, Frost Bank and JPMorgan Chase Bank.

Community credit and service needs in the full-scope AAs, Austin, and Corpus, were determined through discussions with a community contact that supports affordable housing in the bank’s AAs. The contact indicated a need in the bank’s AAs for homebuying assistance, bridge loans for affordable multifamily residence units, financial literacy, and credit counseling. Examiners also considered community contacts provided by other regulatory agencies with organizations which focus on economic development and small businesses, in the bank’s AA.

Corpus Christi AA

American operates 8 full branches and 7 remote ATMs in the Corpus Christi AA, which is comprised of Aransas, Nueces, and San Patricio counties, representing a portion of the Corpus Christi CSA.

During the 2020-2021 evaluation period, examiners considered the bank’s AA as defined by the 2015 ACS census data, which shows that the AA included 6 low income CTs (6 percent), 28 moderate-income CTs (27 percent), 36 middle-income (35 percent), and 30 upper-income CTs (29 percent), with 4 CTs reported as NA. During the 2022 evaluation period, examiners considered the AAs as defined by the 2020 census. Demographic information in 2020 shows that the Corpus AA included 4 low-income CTs (3 percent), 32 moderate-income CTs (26 percent), 47 middle-income CTs (38 percent), and 35 upper-income CTs (28 percent), along with 6 CTs that were reported as NA. Other demographic information on the AA is summarized in the tables below by relevant census period.

Table A - Demographic Information of the Assessment Area Assessment Area: 2015 Corpus Christi CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	104	5.8	26.9	34.6	28.8	3.8
Population by Geography	442,422	5.0	29.0	36.5	28.9	0.6
Housing Units by Geography	186,910	4.8	27.4	37.6	30.2	0.0
Owner-Occupied Units by Geography	95,035	3.2	25.4	37.6	33.7	0.0
Occupied Rental Units by Geography	64,328	6.7	31.7	35.2	26.3	0.0
Vacant Units by Geography	27,547	5.5	23.9	43.3	27.4	0.0
Businesses by Geography	34,715	2.8	27.5	35.5	33.9	0.2
Farms by Geography	1,016	2.1	21.4	34.5	41.9	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		\$58,364	Median Housing Value			\$124,710
Median Family Income Non-MSAs - TX		\$52,198	Median Gross Rent			\$893
			Families Below Poverty Level			13.7%

Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%.
 (*) The NA category consists of geographies that have not been assigned an income classification.

Table A - Demographic Information of the Assessment Area Assessment Area: 2020 Corpus Christi CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	124	3.2	25.8	37.9	28.2	4.8
Population by Geography	445,763	3.7	24.0	39.1	31.7	1.5
Housing Units by Geography	195,034	3.8	23.7	39.6	31.1	1.8
Owner-Occupied Units by Geography	100,554	2.5	23.7	37.4	34.5	2.0
Occupied Rental Units by Geography	63,267	6.6	25.0	44.1	23.9	0.5
Vacant Units by Geography	31,213	2.6	21.2	37.5	34.6	4.0
Businesses by Geography	43,740	3.1	18.3	36.9	40.0	1.8
Farms by Geography	1,257	2.4	16.3	32.6	46.7	2.0
Family Distribution by Income Level	111,473	23.4	16.4	18.3	41.9	0.0
Household Distribution by Income Level	163,821	25.2	15.5	17.1	42.2	0.0
Median Family Income MSA - 18580 Corpus Christi, TX MSA		\$67,685	Median Housing Value			\$159,440
Median Family Income Non-MSAs - TX		\$61,785	Median Gross Rent			\$1,045
			Families Below Poverty Level			12.4%
Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.						

According to the FDIC's June 30, 2022, Deposit Market Share Report, American's deposits in this AA totaled \$1.5 billion, or 79 percent of the bank's total deposits. The bank's deposits in this AA account for 17 percent of the total market share which is the 2nd most of all 16 insured financial institutions within the AA. Frost Bank, a large regional bank, ranks first with a deposit market share of 23 percent. The bank competes in this market with many large banks that have a nationwide presence like Bank of America and Wells Fargo and other large state banks like Prosperity Bank and International Bank of Commerce.

American competes well in small business lending, American was one of the top small business lenders in the Corpus Christi AA throughout the entire evaluation period. The bank ranked first in the small business market share by dollar volume of loans with 26 to 21 percent of the market share during 2020-2022. By number of loans, American was also one of the top lenders in the Corpus market. The bank originated a higher number of loans during 2020-2021 due to PPP lending and American ranked as high as 2nd with 11.6 percent of the small business market share in 2020. By number of loans, the bank ranked 4th in 2021 and 8th in 2022, behind much larger banks with a regional and nationwide presence. American Express NB was the market leader, by number, throughout the entire evaluation period with a market share as high as 23 percent in 2022.

American faces strong competition for mortgage lending in the Corpus Christi AA. Aggregate HMDA data showed that the bank ranked as high as 13th in 2020. The bank's market share in 2021 and 2022 was lower, as the bank faced challenges in this AA from rising home prices, rising rates and continued strong competition from mortgage companies, credit unions, and other larger banks in the AA. Navy Army Community Credit Union ranked first in this AA with a market share of 9.71 percent.

Corpus Christi is a seaport at the mouth of the Nueces River on the west end of Corpus Christi Bay. It is the county seat of Nueces County and the largest city on the South Texas coast. It lies at the junction of Interstate 37 and U. S. highways 77 and 181. Portions of the city also extend into Aransas, Kleberg, and

San Patricio counties. Reports from Moody's Analytics in September 2023, reflect that the AA's primary economic drivers are the defense and energy sectors. Economic strengths include a strategic gulf location that is ideal for trade, exporting goods, and attracting tourism. Top employers in the AA include the Naval Air Station, HEB, and the Corpus Christi Army Depot. Local hospitals and medical centers, institutions of higher education, such as Del Mar College and Texas A&M University, refineries and offshore drilling services are also major employers in the AA. The report from Moody's also reflects that residential construction dropped substantially during 2022. New permits for single-family homes were down by 50%, compared with a national decline of about 33%. Management stated that this was due in part to a shortage of construction workers migrating to higher paying jobs in the oil & gas industry. Home prices in 2022 performed better than elsewhere, rising slightly since 2021 in contrast to declines on the national level. However, the increase in mortgage rates has caused affordability in this AA to fall as much as elsewhere in the US.

Data from the US Bureau of Labor Statistics (BLS) shows that during the evaluation period, the unemployment rate in Corpus Christi ranged from a high of 14.3 percent in April of 2020 to a low of 4.2 percent in December of 2022. Over the same period, the unemployment rate in Texas and the US respectively ranged from highs of 12.8 and 14.7 in April of 2020 to lows of 3.7 in August of 2022 and 3.5 in July of 2022.

Community Contacts:

This evaluation considered comments provided by a community organization focused on affordable housing in the Corpus Christi AA and other Texas markets. The contact stated that there are needs within this AA for financial literacy, credit counseling, and homebuying assistance. We also reviewed other regulatory agency contacts with two other organizations in the AA which focus on economic development and small businesses, in the bank's AA. The review of these contacts and indicated that there are identified needs within the community for home mortgage loans, small business loans, and affordable housing.

Our review of community contacts, local demographics, information provided by the bank, and other performance evaluations in the AA, reflect that there are opportunities for participation in CD related activities by financial institutions, including the following:

- Partnering with and volunteering for nonprofits to help provide financial education, including home buying assistance.
- Partnerships with organizations or government agencies which can help with mortgage down payments and closing costs.
- Providing or sponsoring training for small business owners and entrepreneurs.
- Partnering with CDFIs or other non-profits which focus on meeting AA needs for affordable housing.

Austin AA

American operates one full-service branch and one ATM onsite at the Austin AA branch. The Austin AA includes 3 of 5 counties in the Austin-Round Rock-Georgetown MSA: Travis, Williamson, Hays. Austin is the state capital and is located in central Texas.

During the 2020-2021 evaluation period, examiners considered the bank's AA as defined by the 2015 ACS census data which shows that the AA included 37 low income CTs (11 percent), 67 moderate-income CTs (20 percent), 121 middle-income (36 percent), and 101 upper-income CTs (30 percent), with 4 CTs reported as NA. During the 2022 evaluation period, examiners considered the 2020 census data, which shows 33 low-income CTs (7 percent), 110 moderate-income CTs (23 percent), 162 middle-income CTs (34 percent), and 148 upper-income CTs (31 percent), along with 18 CTs that were reported as NA. Additional demographic data on the AA is summarized in the tables below.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	332	11.1	20.2	36.4	30.4	1.8
Population by Geography	1,772,799	10.7	20.4	36.6	31.1	1.2
Housing Units by Geography	703,773	10.7	18.7	37.7	32.0	0.9
Owner-Occupied Units by Geography	371,405	4.1	15.8	39.5	40.5	0.2
Occupied Rental Units by Geography	279,968	19.1	22.5	35.4	21.2	1.8
Vacant Units by Geography	52,400	13.2	19.2	36.5	29.4	1.7
Businesses by Geography	247,638	6.4	11.6	33.5	47.2	1.2
Farms by Geography	4,850	4.9	13.2	38.5	43.0	0.4
Family Distribution by Income Level	401,265	22.1	16.5	19.7	41.7	0.0
Household Distribution by Income Level	651,373	23.3	16.4	18.0	42.3	0.0
Median Family Income MSA – 12420 Austin-Round Rock-Georgetown, TX MSA		\$78,997	Median Housing Value			\$240,486
			Median Gross Rent			\$1,074
			Families Below Poverty Level			9.4%

Source: 2015 ACS and 2021 D&B Data. Due to rounding, totals may not equal 100.0%
() The NA category consists of geographies that have not been assigned an income classification.*

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	471	7.0	23.4	34.4	31.4	3.8
Population by Geography	2,140,272	6.7	22.3	36.1	32.4	2.5
Housing Units by Geography	810,882	7.0	23.1	36.2	32.0	1.7
Owner-Occupied Units by Geography	436,410	2.8	17.6	39.1	40.0	0.5
Occupied Rental Units by Geography	319,958	12.2	30.5	32.7	21.4	3.1
Vacant Units by Geography	54,514	9.5	23.1	33.9	30.2	3.3
Businesses by Geography	425,918	2.8	12.6	33.0	45.6	6.0
Farms by Geography	7,581	2.2	14.3	34.7	44.9	3.9
Family Distribution by Income Level	467,283	20.7	17.4	21.0	40.9	0.0
Household Distribution by Income Level	756,368	22.4	16.9	18.4	42.4	0.0
Median Family Income MSA – 12420 Austin-Round Rock-Georgetown, TX MSA		\$100,215	Median Housing Value			\$342,615
			Median Gross Rent			\$1,352
			Families Below Poverty Level			6.4%

Source: 2020 U.S. Census and 2022 D&B Data. Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

According to the FDIC’s June 30, 2022, Deposit Market Share Report, American’s deposits in this AA totaled \$158 million, or 8 percent of the bank's total deposits. American deposits in this AA account for only 0.23 percent of the total market share which places the institution at 38th out of the 67 insured financial institutions within the AA. The bank competes with many large banks in this AA that have a national presence such as JP Morgan Chase, Wells Fargo, and Bank of America as well as other large Texas regional banks such as Frost and Texas Capital Bank. JP Morgan Chase ranks first in AA deposit market share with 19.8 percent totaling \$13.6 billion.

American’s primary focus in the Austin AA is also small business lending. The bank’s equipment financing division is based in Austin. The bank faces strong competition in this AA from many larger financial institutions. The most recent 2022 aggregate small business data reported 239 small business lenders in this AA. By number of loans, American ranked 50th with a market share of 0.10 percent. The bank ranked higher, by number, during 2021-2020 with a market share of 35th in 2021 and 33rd in 2020. The bank originated a higher number of loans during 2020, 2021 due to PPP lending. JP Morgan Chase and American Express NB were the market leaders throughout the evaluation period with a combined market share ranging from 52 percent in 2022 to 32 percent in 2020. By dollar volume of loans, American ranked as high as 19th in 2020 with a 1.25 percent market share.

American does not have a significant portion of the mortgage market in the Austin AA. The competitive environment in the Austin market is very strong. HMDA data in 2020 reported 866 lenders in this market. American’s share of the mortgage market reached a high of 0.08 percent in 2020 (by number), ranking 177th. American had fewer mortgage lenders in this market during this evaluation period which partially contributed to lower loan volumes. During 2022, the bank did not generate enough mortgage loans in this AA for a meaningful analysis. The 2022 peer mortgage data reflects American Bank ranked 348 of 872 mortgage lenders with a market share of 0.02 percent based on number of mortgage loans originated in the Austin AA. Wells Fargo is ranked first with a market share of 3.72 percent.

According to a report by Moody's Analytics in August 2023, the AA's primary economic drivers in the Austin MSA are the tech industry and local universities. Economic strengths include strong population growth and a well-educated labor force that attracts high value-added tech businesses. Top employers in the AA include the state of Texas, the University of Texas at Austin, HEB, and Dell Technologies.

Moody's also states that rising mortgage rates in 2022 following extremely fast house price increases in 2021 caused affordability in Austin to fall by nearly 45 percent. Additional information from HUD's Comprehensive Housing Market Analysis for the Austin-Round Rock MSA in January 2021 reported that during 2020, the average home sales price in the area was \$359,900, an increase of 3 percent from 2019. Demand for homes in the range of \$200 thousand to \$299 thousand was very high and the market conditions were tight with low inventories. HUD's report also indicated that during December 2020, the average number of days a home was on the market was only 36 days, down by 20 days from a year earlier. Further, recent data from the Texas A&M Real Estate Center (Texas A&M) shows that the median sales price in the Austin MSA increased from \$345 thousand in 2020 to \$501 thousand in 2022. Texas A&M data further showed that listings declined during 2020, 2021 and inventories (by month) fell to less than one month supply.

Strong population growth in the AA also created strong demand for housing in this AA. QuickFacts data from the Census Bureau show very strong population growth in portions of the bank's Austin AA from 2020 – 2022. Census data shows that the population growth from April 1, 2020 – July 1, 2022, in Hays County was 11.7 percent, 10.20 percent in Williamson County, and 2.8 percent in Travis County.

Data from the US Bureau of Labor Statistics (BLS) shows that during the evaluation period, the unemployment rate in Austin ranged from a high of 11.4 percent in April of 2020 to a low of 2.6 percent in April of 2022 and December of 2022. Over the same period, the unemployment rate in Texas and the US respectively ranged from highs of 12.8 and 14.7 in April of 2020 to lows of 3.7 in August of 2022 and 3.5 in July of 2022.

Community Contacts:

This evaluation considered comments provided by a local non-profit organization which focuses on affordable housing in Texas, and the Austin AA. The contact indicated there is a need in this AA for homebuying assistance and bridge loans for affordable multifamily residence units. We also reviewed a recent regulatory agency contact with a local non-profit organization that focuses on economic development in the AA. Contacts in indicated that there is a need in the Austin AA for affordable housing and credit for small businesses.

Further, our review of community contacts, local demographic information, information provided by the bank, and other performance evaluations, identified opportunities in this AA that are similar to the Corpus AA, including:

- Partnerships with and volunteering for nonprofits to help provide financial education, including home buying assistance.
- Partnerships with organizations, government agencies which can help financial institutions provide borrowers assistance with mortgage down payments and closing costs.
- Providing or sponsoring training for small business owners and entrepreneurs.
- Partnering with CDFIs or other non-profits which focus on meeting AA needs for affordable housing and small business lending.

- Investments in programs sponsored by non-profit state affordable housing corporations.
- Participation on loan committees or boards of local CDFIs with provide mortgage or small business loans.

Scope of Evaluation in Texas

We performed full-scope reviews of the Corpus Christi and Austin AAs and limited-scope reviews of the San Antonio and Victoria AAs. The Corpus Christi AA was selected for a full-scope review because this AA includes the largest share of bank deposits, the largest number of branches, the largest volume of lending activity, and the largest volume of community development activities. The Austin AA was selected for full-scope review as the next largest AA by deposit volume and lending activity. Also, the Austin AA has not been previously evaluated as a full-scope AA. We placed the most weight on activities in the Corpus AA. For loan products, we placed the most weight on small business lending activity as commercial and small business lending is the bank's primary focus.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

The bank's performance under the Lending Test in Texas is rated High Satisfactory. Performance in the limited-scope areas had a neutral effect on the overall Lending Test. CD Lending in the Full-Scope AAs had a significantly positive impact on performance.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Corpus and Austin AAs was good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs in the full scope Corpus and Austin AAs.

The tables below reflect loan origination activity in the bank's AAs throughout the evaluation period. The deposit and lending concentrations within the Corpus and Austin AAs reflect the principal location of the bank's commercial and retail customer base, branch locations, and the bank's lending focus. The deposit percentages reflected in this table are based upon the FDIC's Annual Branch Deposit Report dated June 30, 2022.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Full-Scope							
Corpus Christi	688	2,050	16	33	2,787	71.4%	79.2%
Austin	201	474	5	17	697	17.9%	8.3%
Limited-Scope							
San Antonio	53	138	1	--	192	4.9%	6.1%
Victoria	21	176	21	1	219	5.6%	6.4%
Statewide/Regional	--	--	--	6	6	0.2%	--
Total	963	2,838	43	57	3,901	100.0%	100.0%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Full-Scope							
Corpus Christi	203,446	316,996	2,570	85,125	608,137	64.4%	79.2%
Austin	86,709	87,680	1,283	55,111	230,783	24.4%	8.3%
Limited-Scope							
San Antonio	22,282	27,720	5	--	50,007	5.3%	6.1%
Victoria	4,866	33,511	1,447	574	40,398	4.3%	6.4%
Statewide/Regional	--	--	--	15,426	15,426	1.6%	--
Total	317,303	465,907	5,305	156,236	944,751	100.0%	100.0%

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

As reflected in the tables above, during the evaluation period American originated 963 home mortgage loans totaling \$317 million, 2,838 small business loans totaling \$466 million, 43 loans to small farms totaling \$5 million, and 57 CD loans totaling \$156 million. Since the previous evaluation period, mortgage loan volume across all AAs has increased by about \$156 million. The number of mortgage loans has also increased by about 39 percent. The bank's volume of small business loans (by dollar and number) has also increased significantly during this evaluation period, due in part to the bank's participation in SBA's Paycheck Protection Program (PPP). During 2020 and 2021 American originated 1,596 PPP loans totaling \$234 million. These loans helped to retain about 25 thousand jobs. Seventeen of the PPP loans were reported as CD loans. Loan volume in 4th quarter 2022 was also higher due to the bank's recent acquisition of TexStar.

Corpus Christi AA

During the evaluation period, loan origination activity in the Corpus AA represented a significant amount, 72 percent, of all bank loan origination activity. This volume of lending is similar to the percentage of AA deposits. On June 30, 2022, FDIC Branch Deposit Reports showed that 79 percent of bank deposits were in the Corpus CSA.

Market share information for loans and deposits show that American Bank operates in a highly competitive banking environment. The FDIC's June 30, 2022, Deposit Market Share Report shows that American ranked 2nd out of 16 institutions in the Corpus AA, with 17 percent of the deposit market. The deposit market leader was Frost Bank, a much larger Texas regional bank.

American's small business market share and lending activity in the Corpus AA is excellent, especially when considering the significant level of competition within the AA from national and regional lenders. Aggregate small business data reports that the number of small business lenders in the bank's AA ranged from a high of 128 small business lenders in 2020 to 104 in 2022. Throughout the entire evaluation period, American ranked first in market share by dollar volume of loans. American's percentile ranking of the small business market share, by dollar volume, ranged from 20 to 26 percent, exceeding the bank's deposit market share of 17 percent.

During the years 2020-2021, the bank ranked 2nd in small business market share, by number of loans, only behind American Express NB. In 2020, American achieved 11.6 percent of the small business market share, by number of loans, and 26 percent by dollar volume. In 2021, the bank achieved a strong market share ranking of 4th in the Corpus AA out of 124 reporting lenders, with 6 percent of the market share by number of small loans to businesses and 22 percent by dollar volume. In 2022, the bank ranked 8th in the small business market share with 4 percent by number of loans and 21 percent by dollar volume of loans. By number, the top three lenders for small business lending in 2022 were all larger financial institutions including American Express NB, JP Morgan Chase Bank, and Capital One, NA which collectively accounted for 41 percent of the total number of small business loans originated in the AA.

Aggregate HMDA data in 2020 showed that American ranked as high as 13th out of 440 reporting mortgage lenders in the Corpus market. American achieved a ranking of 18th in 2021 with a similar volume of lenders and in 2022, American ranked 26th out of 470 mortgage lenders with just over 1% of the market share in dollar volume and number of loans. The top five mortgage lenders accounted for approximately 24 percent of mortgage production by count. The top five lenders in 2022 included Navy Army Community Credit Union, Rocket Mortgage, Lakeview Loan Servicing LLC, DHI Mortgage Company Limited, and Wells Fargo. When considering the highly competitive home mortgage market in the AA from specialized mortgage companies, larger state and nationwide banks that offer a wide selection of mortgage products, the bank's lending activity for home mortgages is good.

Austin AA

American operated one branch in the Austin AA. The FDIC's June 30, 2022, Deposit Market Share Report shows that the bank had \$158 million in deposits in this AA, which represented 8 percent of the bank's total deposits, and 0.23 percent of the Austin AA deposit market. American ranked 38th out of 67 institutions in this market. Collectively, JP Morgan Chase Bank, Wells Fargo Bank, Bank of America, Frost Bank, and Texas Capital Bank dominate the deposit market with 67 percent of total deposit market share.

During the evaluation period, about 18 percent of the bank's loan originations (by number) and 24 percent by dollar volume were in the Austin market. This volume of lending exceeds the percentage of AA deposits.

Small business lending activity in the Austin AA is excellent given the significant level of competition within the AA from larger national and regional lenders. The most recent aggregate 2022 small business data shows that the bank ranked 50th, among 239 lenders, with a market share of 0.10 percent, by number of loans, which is somewhat below the bank's deposit market share of 0.23 percent, in this AA. However, the bank's market share of small business loans by dollar volume was 0.67 percent, which exceeds the bank's deposit market share. In 2022, American ranked 29th in small business lending

market share by dollar volume of loans. The top three lenders for small business lending in 2022 were much larger financial institutions, including American Express NB, JP Morgan Chase Bank, and Bank of America, NA, which collectively accounted for 59.8 percent of the total number of small business loans originated in the AA, and 31 percent by dollar volume.

Mortgage loan activity during the evaluation period was lower, by number than the bank's deposit market share. Aggregate peer HMDA data for 2020 - 2022 in the Austin AA, shows that American achieved a mortgage market share as high as 0.08 percent, by number, in 2020, ranking 177th out of 866 reporting lenders. This is lower than the bank's 0.23 percent deposit market share. The market share by dollar volume was higher at 0.8 percent, exceeding the bank's deposit market share. Like the Corpus AA, the Austin AA is a highly competitive market for mortgage lending. The bank maintains a single branch in the AA and is at a disadvantage when trying to compete with larger nationwide financial institutions and specialized mortgage loan originators. During the evaluation period, American also experienced turnover in mortgage loan officers in this market which also contributed to lower mortgage loan volumes. Despite these challenges, mortgage loan volume in this AA, by dollar volume, increased by about \$65 million as compared to the previous CRA evaluation period. The number of mortgage loans in this AA also increased about 5 times the previous evaluation period. When considering these factors, the bank's mortgage lending activity is adequate. The top five mortgage lenders accounted for approximately 16 percent of mortgage production by count. The top five lenders are Wells Fargo Bank, Rocket Mortgage, JP Morgan Chase, United Wholesale Mortgage, and DHI Mortgage Company.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AAs. We placed the most weight on the bank's small business lending performance as commercial and small business lending is the bank's primary focus.

Corpus Christi AA

Home Mortgage Loans

The geographic distribution of home mortgage loans in the Corpus Christi AA reflects a poor distribution throughout the AAs. Refer to Table O in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

During 2020-2021, the percentage of bank home loans was lower than the percentage of owner-occupied housing units located in low-income tracts and lower than the percentage of loans reported by aggregate HMDA reporters. Mortgage lending opportunities in low-income geographies is somewhat limited with only 3.2 percent of owner-occupied housing located in these areas, rental occupied housing units in low-income CTs ranged from 41 to 55 percent. Aggregate HMDA lenders also show minimal penetration in these areas. Similarly, the bank's mortgage lending in moderate-income geographies was significantly lower than the percent of owner-occupied housing located in moderate-income census-tracts (CTs) and was also lower than aggregate lender data.

For 2022, the bank did not report any mortgage loans in low-income CTs. The 2020 census resulted in fewer low-income CTs, consequently there were fewer lending opportunities in low-income areas. The percentage of owner-occupied housing units was lower than prior years at 2.5 percent. Aggregate HMDA lenders only reported 1 percent of loans in these areas, which was also below the percentage of

housing units in these areas. The percentage of bank mortgage loans in moderate-income areas was significantly lower than the percentage of owner-occupied housing units in moderate-income tracts and also lower than aggregate lending data.

Small Loans to Businesses

The bank's geographic distribution of small loans to businesses in the Corpus Christi AA reflects an excellent distribution throughout the AA. Refer to Table Q in 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.

During 2020-2021, the bank's percentage of small loans to businesses in low-income CTs was the same as aggregate lending data and near to the percentage of businesses located in low-income tracts. The bank's lending in moderate-income geographies exceeded both the percentage of businesses located in moderate-income census tracts and aggregate lending data.

During 2022, the bank's percentage of small loans to businesses in low-income CTs exceeded both the percentage of businesses located in low-income tracts and performance by aggregate lenders. The bank's lending in moderate-income CTs was near to the percent of businesses located in moderate-income census tracts and near to performance by aggregate lenders.

Lending Gap Analysis

Examiners reviewed summary reports and maps, and analyzed home mortgages, and small loans to businesses to identify any gaps in the geographic distribution of loans in AAs. In the Corpus AA, a few conspicuous, unexplained lending gaps were identified by the OCC in Nueces County. These gaps lowered the geographic distribution conclusion from good to adequate.

To perform the lending gap analysis, examiners generated reports and maps of CTs where the bank had low or no penetration of HMDA or small business loan originations during the evaluation period. Examiners focused on clusters of LMI CTs with no lending within the AA and then evaluated those clusters to determine if demographic information, or other performance context data reflected lending opportunities within those clusters.

In Nueces County, within the city of Corpus Christi, examiners identified clusters of LMI CTs in the downtown and central parts of the city where there were no HMDA, CRA, or CD loans during 2020, 2021, or 2022. The bank has four branches near these areas. Examiners observed that peer institutions originated loans in these areas. When considering peer performance, the population within these CTs, the number of owner-occupied housing units, and the number of businesses in the identified geographic gaps, examiners concluded that there are additional lending opportunities available within these areas.

Austin AA

Home Mortgage Loans

The geographic distribution of home mortgage loans in the Austin AA reflects a good distribution throughout the entire AA. Refer to Table O in Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

During 2020-2021, the percentage of bank home loans in the Austin AA exceeded both the percentage of owner-occupied housing units located in low-income tracts and the percentage of home loans by aggregate HMDA lenders. The bank's mortgage lending in moderate-income geographies was somewhat lower than the percent of owner-occupied housing units located in moderate-income CTs and was near to aggregate lending data.

During 2022, loan volume was much lower. Rising home prices, increasing interest rates, and mortgage loan officer turnover impacted mortgage loan volume in 2022. The bank originated 15 mortgage loans in the Austin AA which is not a sufficient volume of loans to provide a meaningful analysis. However, the bank did originate one home loan in a low-income CT totaling \$426 thousand and three loans in moderate-income CTs totaling \$1.98 million. Performance during this year had a neutral impact on the rating.

Small Loans to Businesses

The geographic distribution of small loans to businesses reflects good distribution throughout the AA. Refer to Table Q in 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.

During 2020-2021, the bank's percentage of small loans to businesses in low-income CTs exceeded both the percent of businesses located in low-income CTs and aggregate lending data. The bank's distribution of loans in moderate-income CTs was somewhat lower than the percentage of businesses located in moderate-income tracts and lower than aggregate lending data.

During 2022, the bank's lending in low-income CTs was like performance in 2020-2021, the percentage of small loans to businesses in low-income CTs exceeded both the percent of businesses located in low-income tracts and aggregate lending data. The bank's percentage of loans in moderate-income CTs also exceeded the percent of businesses located in these areas, and the percentage of loans was near to performance by aggregate lenders.

Lending Gap Analysis

Examiners reviewed summary reports, maps, and analyzed geographic lending patterns of home mortgage loans and small loans to businesses to identify any gaps in the geographic distribution of loans in this AA. Examiners did not identify any conspicuous or unexplained gaps in lending in LMI geographies of this AA.

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.

Corpus Christi AA

Home Mortgage Loans

The distribution of home mortgage loans to individuals of different income levels is adequate.

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

During 2020-2021, the bank's percentage of home loans to low-income borrowers was significantly lower than the percentage of low-income families in the AA, but bank performance was near to aggregate HMDA lenders. The percentage of bank home loans to moderate-income borrowers was somewhat lower than the percentage of moderate-income families in the AA, but near to performance by aggregate lenders.

During 2022, the percentage of bank home loans to low-income borrowers had improved slightly and was the same as performance by aggregate lenders, although the bank and aggregate lenders were both significantly lower than the percentage of low-income families in the AA. The percentage of bank home loans to moderate-income borrowers was significantly lower than aggregate lenders and the percentage of moderate-income families in the AA.

The loan distributions by aggregate lenders and the bank reflect challenges of home ownership by low- and moderate-income families in this market. There are a number of factors which may have influenced the bank's ability to fully penetrate the LMI demographic. Some of the most significant challenges have included rising home prices, rising interest rates, and the availability of affordable housing. Data from the Texas A&M Real Estate Research Center (Texas A&M) reflects the rising home costs in this market as the median sales price increased from \$200 thousand in 2019 to \$225 thousand in 2020 and \$280 thousand in 2022. Data from the St. Louis Federal Reserve shows that average interest rates during the evaluation period fluctuated from 3.11 percent in 2020, to 2.96 percent in 2021, and 5.34 percent in 2022. Further, data from Texas A&M also shows lower inventories of homes in the AA and lower distributions of home sales below \$150 thousand. For example, home sales below \$69 thousand were only 0.9 percent in 2020 and 0.4 percent in 2021 and 2022. Another challenge in the Corpus AA is a high level of poverty. Census data in 2020 reported that 16.5 percent of households in the AA have incomes below poverty levels. In addition, the bank experienced turnover in the mortgage lending staff during this period.

When considering the median sales price of \$280 thousand as reported by Texas A&M in 2022, an average interest rate of 5 percent, payments on a 30-year mortgage would approximate \$1927 per month or \$29,124 per year. This payment estimate also includes estimates for taxes and insurance as provided by Bankrate.com and a 5 percent down payment. Based on this scenario, payments would approximate 57 percent of income for low-income families and 45 percent for some moderate-income families. This level of debt to income (DTI) is not typically considered affordable, although borrowers could potentially qualify for mortgages at this level under certain government guaranteed programs or flexible loan programs like American's Affordable Mortgage Program (AMP). The bank made one loan in the Corpus AA under the AMP program in 2022 and in an effort to increase lending to LMI borrowers, the bank increased the AMP maximum loan amount to \$300 thousand from \$275 thousand and increased the DTI requirement for this product from 45 percent to 50 percent in 2022. The bank also established relationships with entities such as Thanksgiving Homes which focuses on affordable housing solution for low-income individuals and families.

Small Loans to Businesses

The distribution of loans to businesses with revenues less than or equal to \$1 million is adequate in the AA. Refer to Table R in 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.

During 2020-2021, the percentage of bank loans to businesses with revenues of \$1 million or less was significantly lower than the percent of AA businesses reporting revenues of \$1 million or less. The bank's percentage of loans to small businesses was also somewhat lower than the aggregate level of lending to these businesses. However, during this period, the bank also reported a significant percentage of loans without revenue. A large portion of these loans without revenue, 40 percent, were PPP loans. The bank was a significant participant in PPP lending within this AA and the SBA's PPP program did not require revenue information. Most the bank's PPP loans were to existing customers and revenue information was not necessary under this program.

To help understand the impact of PPP lending on the bank's overall bank lending performance, we utilized internal bank reports to evaluate PPP loan size as a proxy for revenue. We considered only loan amounts less than \$1 million to capture small loans made to businesses. Based on this review, the majority, 69 percent, were made for amounts less than \$100 thousand and 27 percent were for amounts \$25 thousand or less, which likely benefits smaller businesses. The available data suggests that this performance criterion meets the standards for adequate performance.

During 2022, the percentage of bank loans to businesses with revenues of \$1 million or less was still significantly lower than the percent of AA businesses reporting revenues of \$1 million or less, but the bank's small loans to businesses was performance was only somewhat lower than performance by aggregate lenders. The percentage of bank loans to small businesses with revenues of \$1 million or less had improved in 2022 to 34 percent as compared to 29 percent during the 2020-2021 period.

Austin AA

Home Mortgage Loans

The distribution of home mortgage loans to individuals of different income levels is poor. Refer to Table P in Appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

For 2020-2021, the percentage of bank mortgage lending to low-income borrowers was significantly lower than the percentage of low-income families in the AA and lower than the percentage reported by aggregate HMDA lenders in the area. The bank's mortgage lending to moderate-income borrowers was also lower than the percentage of moderate-income families in the AA and lower than aggregate lending performance to moderate-income borrowers.

During 2022, the bank originated 15 mortgage loans in the AA which is not a sufficient volume of loans to provide a meaningful analysis; however, the bank did originate one loan to a moderate-income borrower in this AA totaling \$220 thousand. Performance in 2022 had a neutral impact on the rating.

The lower percentage of loans by the bank and aggregate lenders in comparison to AA demographics reflects challenges with the high cost of housing in the Austin market. As reflected in the Austin AA

profile in the Description of Operations in Texas, the median cost of housing in the Austin AA rose significantly during the evaluation period from \$345 thousand in 2020 to \$501 thousand in 2022. This AA also faces significant challenges with the availability of affordable housing. Data from Texas A&M shows that there were no home sales during 2021 or 2022 less than \$99,000. The distribution of home sales between the ranges of \$100-\$149 thousand and \$150-\$199 thousand was also very low at less than 1 percent. This information further supports the challenges with affordable housing inventory in this market. The bank faced additional challenges during the evaluation period with turnover in the mortgage lending staff which affected mortgage lending volume in 2022. In an effort to increase mortgage lending in this AA, the bank expanded the maximum AMP loan size in the Austin AA to \$375 thousand and established a relationship with a local non-profit which focuses on affordable housing in this market.

Small Loans to Businesses

The distribution of bank loans to small businesses in the AA is adequate. Refer to Table R in 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.

During 2020-2021, the percentage of bank loans to businesses with revenues of \$1 million or less was significantly lower than the percent of AA businesses identified as having revenues of \$1 million or less. The percentage of bank loans was also somewhat lower than the aggregate level of lending to these businesses. The bank was a significant PPP lender in the Austin AA during this period. Consequently, due to the volume of PPP lending, a large portion of the bank's loans to small businesses, 41 percent, did not report annual revenues for comparison purposes.

To understand the impact of PPP lending on overall bank lending performance, we utilized internal bank reports which detailed loan amounts. We utilized loan size as a proxy for revenue and only included loan amounts less than \$1 million to capture small loans made to businesses. Based on this review, the majority, 59 percent, were made for amounts less than \$100 thousand and 23 percent were for amounts \$25 thousand or less, which likely benefits small businesses. The available data suggests that this performance criterion meets the standards of adequate performance.

During 2022, the bank's percentage of small loans to businesses remained significantly below the percent of AA businesses reporting revenues of \$1 million or less, but the bank's performance improved in comparison to aggregate lenders. The percentage of bank loans was near to the percentage reported in aggregate small business data. The bank's percent of small loans to businesses with revenues of \$1 million or less, had increased from 32 percent during 2020-2021 to 42 percent in 2022.

Community Development Lending

The institution is a leader in making CD loans in the full scope AAs. CD lending had a significantly positive effect on the Lending Test conclusion.

The Lending Activity Tables, 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.

Corpus Christi AA

The level of CD lending in the Corpus Christi AA was excellent. The bank made 33 CD loans totaling approximately \$85 million within the AA, representing 50 percent of allocated tier 1 capital. CD loans in this AA were primarily made for revitalization, stabilization of LMI areas or disaster areas, affordable housing, and community services. The bank originated 19 loans totaling \$54 million (63 percent by dollar volume) which supported revitalization, or stabilization in LMI areas, nine loans totaling \$29 million (34 percent) provided community services targeted to LMI individuals, and five loans totaling \$1.6 million (3% percent) supported AA affordable housing initiatives. Notable examples of CD loans originated during the evaluation period include:

- Six loans totaling \$18 million support continued operations for a non-profit organization that supports educational and vocational services for, and employs, sight-impaired and legally blind individuals.
- Two loans to a local non-profit housing entity provide \$1.2 million in permanent financing for affordable housing of low-income individuals receiving section 8 government assistance. The bank's loans provided affordable house for 5 individuals, families.
- During 2020, 2021, the bank made two PPP loans totaling \$4.7 million to a local deli business headquartered in Corpus with 16 locations in Corpus and other South Texas cities. The business had 609 employees of which 91 percent earned low-income wages, and 5 percent earned moderate-income wages. The bank's loans helped this company stay in business during the Covid-19 pandemic and allowed the company to retain employees.

Austin AA

The level of CD lending in the AA was also excellent. The bank made 17 CD loans in the Austin AA totaling \$55 million. These loans represented 307 percent of allocated Tier 1 capital and supported economic development, revitalization, or stabilization of LMI areas, affordable housing, and community services for LMI individuals and families within the AA. Eight of these loans totaling \$35 million (64 percent by dollar volume) supported economic development, six loans totaling \$8 million (14 percent) supported revitalization, and stabilization of LMI areas, two loans totaling \$11 million (20 percent) supported affordable housing initiatives, and one loan totaling \$1 million (2 percent) supported community services targeted to LMI individuals.

Notable examples of CD loans originated during the evaluation period include:

- Four loans totaling \$10.3 million provided support for continuation and expansion of operations for an international company headquartered in a low-income tract of this AA. The bank's loans allowed the company to create and retain jobs for at least 47 LMI individuals.
- Two loans totaling \$20.9 million funded the construction of an office warehouse for a business expanding operations which will help to create additional LMI job opportunities in the area. The company employees approximately 289 individuals with low or moderate-income wages.
- One loan totaling \$4.5 million to fund the development and construction of 23 affordable housing townhomes in conjunction with a project led by the Austin Housing Finance

Corporation, a nonprofit instrumentality of the City of Austin created to generate and implement strategic housing solutions for the benefit of low- and moderate-income residents.

- One loan totaling \$500 thousand provided a line of credit to a local Community Development Financial Institution (CDFI) which originates SBA loans to local small businesses and LMI individuals that do not have customary access to capital.

Statewide/Regional Loans

During the evaluation period, American made six CD loans outside of the bank's AA, totaling \$15 million. Two of these loans totaling \$10 million originated through the bank's Houston LPO. One of these loans supported affordable housing in Harris County, which is part of the lending territory for the LPO, while the other loan supported revitalization of a low-income CT in Montgomery County, which is also in the bank's Houston MSA lending territory. One of the bank's CD loans for \$2.5 million also providing financing for rebuilding a chemical plant which was destroyed in a Hurricane in 2020. The bank's loan will help to bring back jobs to the regional area near the bank's Houston LPO. Two of the out-of-area CD loans provided 137 affordable housing units in the South Texas community of La Feria. Another out of area CD loan helped to support economic development and revitalization of a moderate-income CT through the financing of a new hotel in a moderate-income CT, of a non-MSA Texas county. This loan created 12 new jobs for low-income individuals in this community between the bank's Corpus AA and the Houston LPO.

Product Innovation and Flexibility

AMP Loans - During the evaluation period, American originated 47 AMP loans in the Corpus AA totaling \$7.7 million, which represented 92 percent of all AMP originations. The bank originated 3 AMP loans in the Austin AA, totaling \$670 thousand- and one-AMP loan in the San Antonio market totaling \$191 thousand.

In the Corpus Christi AA, American works with the local housing authority and an affiliated non-profit to make them aware of the AMP program. In the Austin AA, American works with another local a non-profit organization, which serves as the affordable housing consulting arm of the Austin Habitat for Humanity. The bank has also been added as an approved lender to the City of Austin's affordable housing program.

FHA, VA Loans – During the evaluation period, American originated 21 FHA loans in the Corpus AA totaling \$4.4 million and 13 VA loans totaling \$3.6 million. The bank also originated one VA loan in the Austin AA totaling \$328 thousand.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the San Antonio AA and Victoria AAs was weaker than the bank's overall performance under the Lending Test in the full-scope areas. The weaker performance in San Antonio was due to the lack of CD loans in this AA and lower volume of mortgage lending. Lending in the Victoria AA was also weaker due to lower volume of CD and mortgage lending. Performance in the limited-scope AAs did not have a significant impact on the overall rating.

Tables O through R in Appendix D include the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Texas is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Corpus AA is excellent, while performance in the Austin AA is adequate.

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution demonstrates good responsiveness to credit and community economic development needs. The institution occasionally uses innovative or complex investments to support CD initiatives. During the evaluation period, CD related investments in the bank's AAs totaled \$55.7 million. This total represented 26 percent of the bank's Tier 1 Capital at year-end 2022. American made an additional 81 donations in the bank's AA totaling \$413 thousand. In addition, bank management made 53 other investments totaling \$25.9 million within broader regions of the state. Some of these additional statewide investments were in the Houston area where the bank's LPO is located. American's investments demonstrate good responsiveness to AA needs. The table below summarizes investment performance in each of the AAs.

Assessment Area	Qualified Investments									
	Prior Period*		Current Period**		Total				Unfunded Commitments***	
	#	\$ (000's)	#	\$ (000's)	#	% of Total #	\$ (000's)	% of Total \$	#	\$ (000's)
Full Scope										
Corpus Christi	10	6,245	40	39,627	50	44.2	45,872	56.2	0	0
Austin	3	4,718	0	0	3	2.7	4,718	5.8	0	0
Limited Scope										
San Antonio	1	500	1	1,005	2	1.8	1,505	1.8	0	0
Victoria	0	0	5	3,609	5	4.4	3,609	4.4	0	0
Total AA Investments	14	11,463	46	44,241	60	53.1	55,705	68.3	0	0
Regional/Statewide	51	25,366	2	490	53	46.9	25,856	31.7	0	0
Total	65	36,829	48	44,731	113	100.0	81,560	100.0	0	0

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

** Current Period Investments in this table do not include donations. These are detailed separately in the full scope AAs.

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

Corpus Christi AA

The volume of investment activity in the bank's Corpus Christi AA is excellent. During the evaluation period, American made current period qualified investments totaling \$39.6 million. Most of these investments focused on supporting education in communities with high levels of economically disadvantaged students and providing affordable housing to LMI borrowers. Prior period investments totaled \$6.2 million and continue to provide an ongoing benefit for affordable housing and schools for economically disadvantaged students. Some of the notable examples include:

- 12 municipal securities totaling \$30 million which support Corpus Christi TX Independent School District and focus on educational needs in schools where 73 percent of students are economically disadvantaged.
- A Freddie Mac mortgage-backed security totaling \$1.7 million which provides funding for an apartment complex in Aransas Pass with 80 affordable housing units.
- A \$9 million investment in a CRA Fund which helped to fund three apartment homes for LMI individuals and families and ten homes for low or moderate-income borrower in the bank's Corpus AA.

During the evaluation period, American also made 54 donations, contributions, and grants in the Corpus AA totaling approximately \$306 thousand. The bank's contributions have supported organizations which provide essential services and scholarships to LMI individuals in the bank's AA. The bank's donations have supported the local food bank, local healthcare and community-service groups, affordable housing, and disaster recovery.

- For example, during this evaluation period, American made a \$50 thousand donation in support of a local healthcare foundation which provides services to everyone with an emphasis on caring for the underserved of the community. The bank has made a 5-year commitment to fund up to \$250 thousand.
- The bank has also supported a local children's hospital with over \$80 thousand in donations. The hospital accepts every child regardless of the ability to pay and the majority of patients qualify for Medicaid.

Austin AA

The bank's investment performance in the Austin AA was adequate. The bank did not have any current period investments, although the bank did have three prior period mortgage-backed securities totaling \$4.7 million which continue to provide affordable housing for LMI families in the AA. The bank's securities in this AA have provided funding for 23 homes to LMI individuals. Affordable housing is a significant need in this AA and the bank's investments have been responsive to this need. The bank also made twelve donations or grants in this AA totaling \$85 thousand. These donations supported local non-profits and organizations that focus on economic development, job creation, education, and programs that provide essential services for LMI families and children.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the San Antonio and Victoria AAs is consistent with the bank's overall performance under the Investment Test in the full-scope areas.

Statewide/Regional Area

American also has a significant number and dollar volume of qualified investments outside of its AA. 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 individuals and families. One of the prior period investments totaling \$950 thousand is an investment in a Small Business Investment Company (SBIC), which provides funding for small businesses. During the evaluation period, American also purchased two certificates of deposit in minority owned depository institutions, both of which are in Texas.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Corpus AA is good. Based upon a full scope review, the bank's performance in the Austin AA is adequate.

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 (2020-2021)												
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches					Population*			
				Location of Branches by Income of Geographies (%) *					% of Population within Each Geography			
				Low	Mod	Mid	Upp	NA	Low	Mod	Mid	Upp
Full Scope Review												
Corpus	80.8	8	66.7	0.0	25.0	25.0	50.0	0.0	5.0	29.0	36.5	28.9
Austin	8.1	1	8.3	0.0	0.0	0.0	100.0	0.0	10.7	20.4	36.6	31.1
Limited Scope Review												
San Antonio	5.3	1	8.3	0.0	0.0	0.0	100.0	0.0	7.4	34.0	27.7	30.9
Victoria	5.8	2	16.7	0.0	0.0	100.0	0.0	0.0	3.4	32.2	31.2	33.1
Total	100.0	12	100.0	0.0	16.7	33.3	50.0	0.0	8.5	27.6	32.5	30.8

* Population and Geographic locations are based upon 2015 ACS Census Data. Deposit data is based upon the annual FDIC deposit report as of June 30,2021

Distribution of Branch Delivery System (2022)												
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	Upp	NA	Low	Mod	Mid	Upp
Full Scope Review												
Corpus	70.6	8	44.4	0.0	12.5	12.5	62.5	12.5	3.7	24.0	39.1	31.7
Austin	6.3	1	5.5	0.0	0.0	0.0	100.0	0.0	6.7	22.3	36.1	32.4
Limited Scope Review												
San Antonio	18.2	7	38.9	14.3	0.0	57.14	28.5	0.0	6.5	30.3	30.4	32.6
Victoria	4.9	2	11.1	0.0	50.0	50.0	0.0	0.0	5.3	24.4	43.6	26.7
Total	100.0	18	100.0	0.0	16.7	16.7	58.3	8.3	6.3	26.1	34.0	32.3

*Population and Geographic Locations are based upon 2020 Census Data. Deposit data is based upon the annual FDIC deposit report as of June 30, 2022.

Corpus Christi AA

American operated eight banking offices and 13 ATMs (including five 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 throughfares, and the remote ATMs are in public places such as hospitals and grocery stores. American did not open or close any branches within the Corpus AA.

The 2020 census update resulted in the reclassification of five CTs where the bank has branches and remote ATMs in this AA. As a result of the census changes, the bank's geographic distribution of branches changed in 2022 from the 2020-2021 evaluation period. One of the middle-income CTs changed to a moderate-income CT in 2022, two of the moderate-income CTs in 2020-2021 changed to upper-income CTs in 2022, one of the upper-income CTs changed to "unknown" and one of the moderate-income CTs changed to a middle-income CT.

During the 2020-2022 evaluation period, the bank did not have any branches in low-income geographies. Although during 2020-2021 there were just six low-income CTs in the AA, and in 2022 there were only four low-income CTs. During 2020-2021 American had 2 branches (Uptown and Shoreline) located in moderate income CTs and the percentage of branches in these areas closely aligned with AA population for 2020-2021. Both of these moderate-income CTs were reclassified to upper-income areas in the 2020 census, and one of the middle-income areas (South Branch) changed to moderate. As a result of these demographic shifts, in 2022, the bank only had one branch in a moderate-income CT and the percentage of AA population in both low- and moderate-income CTs was slightly lower than during 2020-2021.

Finally, the Rockport Branch was located in an upper income CT during 2020-2021, but in 2022 the income information for this CT was reported by the FFIEC as unknown. Census Bureau data from 2020 and more recent updates in 2022 and 2023 from the ACS Survey show that the location of this branch is categorized as a moderate-income CT. When considering this information from the Census Bureau, the bank's distribution of branches in moderate-income CTs in 2022 is 25 percent, which is similar to distributions in 2020-2021, and in line with AA population. Also, all American branches located in an

upper income CT, apart from the Saratoga Branch, are located adjacent to moderate income CTs. The bank's small business loan distributions in LMI areas and mortgage lending performance during 2020-2021 also reflect reasonable accessibility of bank services.

Austin AA

American operates one banking office and 1 ATM inside the Austin AA, in Austin, Travis County. The bank closed the downtown Austin location October 2020. There are no banking offices in Hays and Williamson County. The one branch office and ATM are in an upper income area of Austin/Westlake. The bank also has an office in this AA which focuses solely on equipment financing. This office is in a middle-income area of Austin and is not an official branch location.

The bank's AA is large relative to the number of branches, loan, and deposit market share in this AA. The one branch location is not representative of AA populations in low, moderate, and middle-income CTs and the branch office is not adjacent to low-or moderate-income areas; however, the bank's mortgage lending performance during 2020-2021 and small business lending performance throughout the evaluation period have demonstrated the bank's reasonable accessibility to the AA, including low- and moderate-income CTs. For additional information on lending performance refer to Tables O and Q in Appendix D.

Alternative Delivery

American expands the availability of banking services through several alternative delivery channels such as ATMs, online, and mobile banking. The bank offers text-based banking services through its mobile application allowing customers to access account balances, view account history, and initiate one-time account transfers. 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. In addition, bank customers can view account balances, pay bills, transfer funds among their American accounts, as well as transfer funds to other banks through external transfers and Zelle. Commercial customers can use online ACH origination, remote deposit capture, positive pay, wire transfer, and payroll services. Commercial lending services are available in all assessment areas. Consumer customers can submit mortgage loan applications online and commercial customers can submit online applications for equipment financing through an online portal. Payments for equipment financing are typically made through ACH. Internal reports show that alternative delivery systems are reasonably effective in providing access to low- or moderate-income customers in all the bank's geographies. For example, internal reports show that about 73 percent of all commercial customers utilize alternative services such as ACH origination, mobile, or remote deposit capture and about 22 percent of these customers are in low-or moderate-CTs. Reports on consumer utilization of online delivery channels also show about 23 percent were customers in low-or moderate-income CTs.

Branch Openings and Closings

The institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, including accessibility in low-or moderate-income geographies and/or to low- and moderate-income individuals. As reflected in the table below, during the evaluation period, American closed a branch in downtown Austin, which was in an upper-income geography. In 2020, the bank opened a new full-service branch in an upper-income area of San Antonio. Also, in October 2022, the bank acquired six new branches in the San Antonio AA through the acquisition of TexStar which resulted in one new branch in a low-income area of San Antonio, four in middle-income areas, and one

new location in an upper income-area of New Braunfels, Comal County, which is also part of the San Antonio MSA.

Distribution of Branch Openings/Closings						
2020 -2021	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full Scope						
Austin	0	1	0	0	0	-1
Corpus Christi	0	0	0	0	0	0
Limited Scope						
San Antonio	1	0	0	0	0	1
Victoria AA	0	0	0	0	0	0
Total	1	1	0	0	0	0

Distribution of Branch Openings/Closings						
2022	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Full Scope						
Austin	0	0	0	0	0	0
Corpus Christi	0	0	0	0	0	0
Limited Scope						
San Antonio	6	0	1	0	4	1
Victoria	0	0	0	0	0	0
Total	6	0	1	0	4	1

Services and Hours

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 and one in Austin; although mortgage lenders are available at all locations, as necessary. American offers flexible mortgage products including government backed FHA, VA, and USDA loans. In addition, American offers the special AMP to individuals who are considered LMI or are purchasing homes in LMI areas. This product is available in all AAs.

Banking hours and services are consistent throughout most AAs and tailored to the convenience and needs of the AA, including low- and moderate-income geographies and/or individuals. All branch lobbies, including the branches in the full-scope Corpus and Austin AA are open Monday – Friday 9:00 a.m. – 4:00 p.m. One location in Corpus also offers lobby hours on Saturdays. This branch is in an upper-income CT. Drive through banking hours are similar in all AAs as well. Most drive throughs offer extended hours, Monday – Thursday 8:00 a.m. – 5:00 p.m. and Saturdays 9:30 a.m. – 12:30 p.m. Two branches in Corpus, including one in a moderate-income CT, the Victoria, Rockport, and Port Aransas locations offer later drive-through hours

until 6:00 p.m. Monday – Friday. The Shoreline office is the main office, and it does not have a drive through, but this location is within one half mile from another branch with a drive-through that does offer services until 6:00 p.m. Monday - Friday. The new branches in San Antonio are not open on Saturdays, although drive-throughs are open until 5:00 p.m. during the week. 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.

Conclusions for Areas Receiving Limited-Scope Reviews

Corpus Christi AA

During the evaluation period, 37 bank personnel devoted 1,544 hours to 33 different qualifying organizations in the Corpus Christi AA. Activities included providing leadership and technical expertise through board and committee membership. The qualifying organizations focus primarily on providing essential services to LMI individuals and families, affordable housing, economic development, and revisitation and stabilization of disaster areas in the AA. Bank employees have donated time and provided leadership and financial expertise to organizations focused on scholarship programs for LMI individuals, essential medical services, and educational programs. A few notable examples of CD services in the Corpus Christi AA during the evaluation period are summarized below:

- During the evaluation period, two bank employees have provided approximately 55 hours of leadership and financial expertise as Board members on the non-profit Habitat for Humanity, in Corpus Christi. The organization builds home for families and individuals in need of safe, affordable housing. In the Corpus area, the local chapter has also supported Hurricane preparedness drives with emergency kits and PPE gear.
- One bank employee has provided leadership and financial expertise and 108 hours of service during 2020-2022 as a founding Board member and VP of Finance for a local non-profit organization which supports student programs, projects and initiatives that do not receive tax-based funding for a local school district where about 51.9 percent of the students are economically disadvantaged. The organization provides grants to schools to support student learning at all grade levels. For example, during 2020-2021 the foundation provided grants for wireless technologies, tablets allowing teachers to record lessons for virtual students which was important for learning environment during the Covid-19 pandemic. Grants in 2021-2022 also provided IPADs for elementary and middle school students.
- Two bank employees have provided at least 51 hours of leadership service and financial expertise as the Board President and Vice President of a local non-profit health center which provides affordable, holistic, and quality health care services to the underserved population in this AA. The organization is a Federally Qualified Health Center, which is a federal designation assigned to non-profits or public health care organizations the serve predominately uninsured or underserved populations and are located in or serving a designated Medically Underserved Area. Services are provided regardless of the ability to pay. Fees are assessed on a sliding scale based on family size and income. The Health Resources and Service Administration (HRSA) has designated Aransas County, and portions of Nueces County and Corpus Christi as medically

underserved areas for primary care.

Austin AA

During the evaluation period, 19 bank personnel devoted 1,457 hours to 28 different qualifying organizations in the Austin AA. Activities included providing leadership and technical expertise through board and committee membership. The qualifying organizations focus primarily on providing essential to LMI individuals and families, affordable housing, and economic development. Noteworthy examples of CD services in the Austin AA during the evaluation period are summarized below:

- A bank employee and a director worked with a local non-profit entity which provides scholarship programs for LMI individuals. The bank director served on the board of this entity providing 208 hours of service, leadership, and financial expertise. The bank officer contributed 94 hours of service to this organization as a member of the leadership program. The organization provided 15 scholarships to LMI students totaling \$108 thousand in 2022.
- An American Bank employee provided at least 14 hours of leadership on the board and financial expertise as a Vice President of Finance for a local home builders association which also partners with local non-profits focusing on housing for the homeless, affordable housing and other essential needs of LMI individuals and families.
- The Austin Economic Development Corporation is a non-profit entity of the city Austin, which helps to bring additional financing options that leverage public and private investments for community and economic development projects. One of the bank's board members provided approximately 72 hours during the evaluation period serving as a member of the Board and Real Estate committee. As part of his work, the director provided financial expertise and leadership in the evaluation and assistance of iconic, historic, and new businesses in Austin.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the San Antonio and Victoria AAs is consistent with the bank's overall performance in the Corpus Christi and Austin AA.

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:	January 2, 2020, to December 31, 2022	
Bank Products Reviewed:	Home mortgage, small business, community development loans, qualified investments, community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
		Investments
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State (s)		
Texas		
Corpus Christi – CSA	Full Scope	Nueces, San Patricio, (Corpus Christi MSA) and Aransas County, which is part of the 2020 Corpus Christi CSA.
Austin – MSA	Full Scope	Travis, Hays, and Williamson Counties, which represents part of the Austin MSA
San Antonio – MSA	Limited Scope	Bexar, Comal Counties, which represents a portion of the San Antonio MSA
Victoria - MSA	Limited Scope	Victoria, Goliad Counties – includes the entire Victoria MSA

Appendix B: Summary of 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, National Association	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
State:				
Texas	High Satisfactory	High Satisfactory	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.

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																				2020-21
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																				
Corpus CSA	557	157,013	69.2	16,155	3.2	0.2	0.5	25.4	7.5	11.6	37.6	42.7	35.3	33.7	49.6	52.6	0.0	0.0	0.0	
Austin	186	75,147	23.1	152,493	4.1	5.9	3.6	15.8	10.8	12.7	39.5	24.7	42.8	40.5	57.5	40.7	0.2	1.1	0.2	
Limited Scope																				
San Antonio	42	15,896	5.2	93,832	5.3	2.4	1.7	27.8	2.4	14.5	27.5	21.4	31.8	39.4	73.8	52.0	0.0	0.0	0.0	
Victoria	20	4,686	2.5	2,890	2.0	5.0	1.0	23.9	20.0	17.9	32.2	20.0	29.6	41.9	55.0	51.6	0.0	0.0	0.0	
Total	805	252,741	100.0	265,370	4.4	1.7	2.7	22.2	8.3	13.3	34.0	36.9	38.3	39.3	52.8	45.5	0.1	0.2	0.1	
<i>Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022
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																				
Corpus CSA	131	46,434	82.9	11,157	2.5	0.0	1.0	23.7	1.5	12.0	37.4	30.5	34.4	34.5	66.4	50.8	2.0	1.5	1.7	
Austin	15	11,562	9.5	87,554	2.8	6.7	2.0	17.6	20.0	18.0	39.1	0.0	42.5	40.0	73.3	36.9	0.5	0.0	0.6	
Limited Scope																				
San Antonio	11	6,386	7.0	69,859	4.5	0.0	2.0	27.3	9.1	16.9	31.6	45.5	34.9	36.4	45.5	46.0	0.3	0.0	0.2	
Victoria	1	180	0.6	1,819	4.6	0.0	1.6	18.4	0.0	14.1	46.0	100.0	44.6	31.0	0.0	39.6	0.0	0.0	0.0	
Total	158	64,562	100.0	170,389	3.5	0.6	2.0	22.4	3.8	17.1	35.9	29.1	38.9	37.7	65.2	41.5	0.5	1.3	0.5	
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				

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																				
Corpus CSA	557	157,012	69.2	16,155	22.6	1.1	2.1	17.4	8.8	9.4	18.2	10.2	17.1	41.8	70.6	44.0	0.0	9.3	27.4	
Austin	186	75,147	23.1	152,493	22.1	0.5	3.1	16.5	7.5	12.4	19.7	14.0	18.3	41.7	66.7	45.9	0.0	11.3	20.3	
Limited Scope																				
San Antonio	42	15,896	5.2	93,832	24.1	2.4	2.9	17.7	2.4	12.7	19.3	2.4	19.2	39.0	83.3	33.3	0.0	9.5	31.9	
Victoria	20	4,686	2.5	2,890	23.2	5.0	3.8	16.8	10.0	13.2	18.2	5.0	19.7	41.9	55.0	35.4	0.0	25.0	27.9	
Total	805	252,741	100.0	265,370	23.1	1.1	3.0	17.1	8.2	12.4	19.3	10.6	18.5	40.5	69.9	41.2	0.0	10.2	24.9	

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

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																				
Corpus CSA	131	46,434	82.9	11,157	23.4	3.1	3.6	16.4	2.3	13.1	18.3	12.2	19.4	41.9	68.7	40.9	0.0	13.7	23.1	
Austin	15	11,562	9.5	87,554	20.7	0.0	3.6	17.4	6.7	12.3	21.0	6.7	19.8	40.9	60.0	46.7	0.0	26.7	17.5	
Limited Scope																				
San Antonio	11	6,386	7.0	69,859	23.0	0.0	3.2	17.5	0.0	14.2	19.5	0.0	20.3	40.0	63.6	37.9	0.0	36.4	24.3	
Victoria	1	180	0.6	1,819	22.5	0.0	3.6	17.2	0.0	13.0	19.0	0.0	20.3	41.4	0.0	41.2	0.0	100.0	21.9	
Total	158	64,562	100.0	170,389	22.0	2.5	3.5	17.3	2.5	13.2	20.0	10.8	20.0	40.6	67.1	42.7	0.0	17.1	20.7	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data, 2022 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																				2020-21
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	
Full Scope																				
Corpus CSA	1,692	243,693	72.6	9,329	2.8	2.0	2.0	27.5	33.5	26.3	35.5	40.8	38.0	33.9	23.4	33.7	0.2	0.3	0.0	
Austin	403	72,077	17.3	70,992	6.4	7.2	7.0	11.6	8.2	13.1	33.5	32.3	34.8	47.2	51.4	44.2	1.2	1.0	0.9	
Limited Scope																				
San Antonio	95	18,011	4.1	42,038	4.8	6.3	4.5	22.9	29.5	22.8	27.6	12.6	26.2	44.4	50.5	46.1	0.3	1.1	0.3	
Victoria	141	24,956	6.0	2,155	2.0	0.0	2.4	31.6	22.0	30.7	29.8	38.3	29.8	36.4	39.7	37.1	0.1	0.0	0.0	
Total	2,331	358,737	100.0	124,514	5.5	3.0	5.7	17.1	28.3	17.7	31.6	38.0	32.1	45.0	30.3	44.0	0.8	0.4	0.6	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022
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	
Full Scope																				
Corpus CSA	358	73,303	70.6		3.1	3.6	2.5	18.3	17.9	18.5	36.9	38.3	35.8	40.0	39.9	41.2	1.8	0.3	2.0	
Austin	71	15,603	14.0		2.8	5.6	3.5	12.6	15.5	18.0	33.0	35.2	32.3	45.6	43.7	44.2	6.0	0.0	2.0	
Limited Scope																				
San Antonio	43	9,709	8.5		5.3	4.7	5.2	23.2	9.3	22.2	26.2	39.5	25.7	44.7	46.5	46.5	0.6	0.0	0.6	
Victoria	35	8,555	6.9		3.3	0.0	4.6	28.5	51.4	23.6	39.6	20.0	41.6	28.4	28.6	28.6	0.1	0.0	0.0	
Total	507	107,170	100.0		3.6	3.7	4.0	16.6	19.1	19.6	31.1	36.7	30.3	44.8	40.2	40.2	3.9	0.2	1.5	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA 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												2020-21
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												
Corpus CSA	1,692	243,693	72.6	9,329	84.1	29.3	41.1	3.8	30.4	12.1	40.3	
Austin	403	72,077	17.3	70,992	89.4	32.3	45.3	3.0	26.8	7.6	40.9	
Limited Scope												
San Antonio	95	18,011	4.1	42,038	87.0	33.7	43.7	3.6	24.2	9.5	42.1	
Victoria	141	24,956	6.0	2,155	82.2	37.6	42.3	4.5	27.0	13.4	35.5	
Total	2,331	358,737	100.0	124,514	88.0	30.5	44.4	3.3	29.3	8.7	40.2	
Source: 2021 D&B Data; 01/01/2020 - 12/31/2021 Bank Data; 2021 CRA 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												2022
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												
Corpus CSA	358	73,303	70.6	8,606	87.3	34.4	46.4	2.9	52.0	9.8	13.7	
Austin	71	15,603	14.0	74,689	93.5	42.3	48.9	1.7	40.8	4.7	16.9	
Limited Scope												
San Antonio	43	9,709	8.5	47,109	90.3	37.2	46.4	2.5	48.8	7.2	14.0	
Victoria	35	8,555	6.9	1,993	85.7	42.9	52.0	3.4	40.0	10.9	17.1	
Total	507	107,170	100.0	132,397	92.0	36.3	47.9	2.1	49.3	5.9	14.4	
Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%												