

**INTERMEDIATE SMALL BANK** 

# **PUBLIC DISCLOSURE**

September 21, 2021

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Texas Gulf Bank, National Association Charter Number 10420 1626 South Voss Road Houston, TX 77057

Office of the Comptroller of the Currency 909 Fannin Street, Suite 1900 Houston, TX 77010

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 lending test is rated: Satisfactory. The community development test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on a reasonable loan-to-deposit (LTD) ratio, an excellent geographic distribution, a reasonable borrower distribution, and a majority of the bank's loans being in the assessment area (AA).
- The Community Development (CD) Test rating is based on a reasonable level of CD loans, qualified investments and donations, and CD services.

### **LTD Ratio**

Considering the bank's size, financial condition, and credit needs of the AA, the LTD ratio is reasonable.

Our analysis included four similarly situated banks in Texas ranging in total asset size from \$538 million to \$846 million. The bank's quarterly average LTD ratio since the last CRA evaluation was 74 percent, ranging from a low of 66 percent in the third quarter of 2019 to a high of 83 percent in the third quarter of 2020. The comparator quarterly average ratio over the same period was 87 percent. These quarterly average ratios ranged from a low of 73 percent to a high of 101 percent.

### Lending in AA

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

The bank originated 54 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank level rather than the AA level. This percentage does not include extensions of credit by affiliates, as we did not review any affiliate lending during this evaluation period.

	]	Number o	of Loans			Dollar A	mount o	of Loans \$(	000s)		
Loan Category	Insi	de	Outs	ide	Total	Insid	le	Outsi	Total		
	#	%	#	%	#	\$	%	\$	%	\$(000s)	
Home Mortgage	91	55.2	74	44.8	165	39,396	46.7	44,971	53.3	84,367	
Business	43	47.8	47	52.2	90	24,310	33.6	48,073	66.4	72,384	
PPP	14	70.0	6	30.0	20	2,503	86.2	400	13.8	2,903	
Total	148	53.8	127	46.2	275	66,209	41.5	93,444	58.5	159,654	

# **Description of Institution**

Texas Gulf Bank, NA (TGB) is a single-state community bank headquartered in Houston, Texas. The bank was chartered in August 1913 and is wholly owned by Texas Gulf Bancshares, Inc., a one-bank holding company with headquarters in Houston, Texas.

TGB's only rating area is Texas, which includes one AA in the Houston-The Woodlands-Sugar Land metropolitan statistical area (MSA). There were no branch openings or closures during the evaluation period. TGB offers drive-thru services at all locations except the West University branch, while automated teller machines are available at every location.

As of June 30, 2021, TGB had total assets of \$666 million and a tier 1 leverage capital ratio of 10.9 percent. TGB offers a variety of commercial, retail, and trust services. Deposit services include traditional personal and business checking/savings accounts, as well as online banking, bill payment, remote deposit capture, telephone banking, and mobile banking services.

There are currently no legal or financial factors impeding TGB's ability to meet the credit and CD needs of its AA. TGB was rated "Satisfactory" at the last CRA examination dated June 4, 2018.

## Scope of the Evaluation

#### **Evaluation Period/Products Evaluated**

The evaluation period for the Lending Test was January 1, 2018 through December 31, 2020. As of December 31, 2020, business financing represented the largest portion of the loan portfolio at 59 percent by dollar amount. Residential real estate financing was also a primary lending product representing 26 percent of the loan portfolio by dollar amount. We evaluated both lending products under the Lending Test with equal weight. Additionally, we sampled 20 loans originated under the Small Business Administration (SBA) Paycheck Protection Program (PPP) for geographic distribution. The evaluation period for the CD Test was consistent with the Lending Test.

#### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a fullscope review. For purposes of this evaluation, bank delineated AAs located within the same MSA 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. Refer to the "Scope" section under the State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

#### Ratings

The bank's overall rating is limited to the state of Texas, as TGB only has branches in Texas.

The state rating is based on performance in all bank AAs. Refer to the "Scope" section under each state Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

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

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

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

# **State Rating**

### **State of Texas**

CRA rating for the State of Texas: Satisfactory The Lending Test is rated: Satisfactory The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- An excellent distribution of loans by income of geographies;
- A reasonable distribution of loans by income of borrowers; and
- A reasonable level of CD loans, qualified investments and donations, and services.

## **Description of Institution's Operations in Texas**

TGB operates nine full-service branches in one AA located in the Houston-The Woodlands-Sugar Land MSA. The Houston MSA AA includes all census tracts (CTs) in Brazoria County, 113 CTs in Harris County, and 12 CTs in Galveston County.

As of June 30, 2021, TGB held deposits totaling approximately \$557 million, which represented a 1.18 percent market share and ranked the bank 19 of 82 institutions in the AA. The largest depository institutions were JPMorgan Chase Bank, Wells Fargo Bank, and BBVA USA, which held a combined 36 percent market share in the AA.

#### **Community Contacts**

We identified four individuals representing various local organizations, which included CD, public services, small business development, and an education extension program specialist. Primary needs identified included affordable housing options, homebuyer assistance programs, and financial education workshops on budgeting, taxes, and financial literacy. TGB helped meet these needs by providing small business loans, as well as providing CD activities for affordable housing and financial literacy.

	Assessment A	Area: Hous	ston MSA			
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	176	6.3	15.3	35.8	40.9	1.1
Population by Geography	1,086,047	5.4	13.1	37.9	42.8	0.8
Housing Units by Geography	418,699	5.3	13.7	36.1	43.8	1.2
Owner-Occupied Units by Geography	240,212	2.2	9.4	37.0	51.1	0.3
Occupied Rental Units by Geography	143,442	9.9	19.6	33.8	34.0	2.7
Vacant Units by Geography	35,045	7.1	19.1	38.8	33.6	1.
Businesses by Geography	117,785	5.4	10.9	26.9	56.1	0.6
Farms by Geography	1,871	4.3	9.4	37.3	48.8	0.3
Family Distribution by Income Level	269,355	19.2	14.5	17.0	49.3	0.0
Household Distribution by Income Level	383,654	20.0	14.3	16.8	48.9	0.0
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		\$69,373	Median Housi	ng Value		\$204,659
			Median Gross	Rent		\$1,060
			Families Belov	w Poverty Lev	vel	9.9%

### **Scope of Evaluation in Texas**

The Houston MSA AA received a full-scope review, as it is the only AA. Refer to appendix A for a list of all AAs under review.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

### LENDING TEST

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

### **Conclusions for Area Receiving a Full-Scope Review**

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

#### Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the state.

#### **Home Mortgage Loans**

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

During the evaluation period, the distribution of home mortgage loans to borrowers in low- and moderate-income (LMI) geographies was excellent. The bank's proportion of residential loans to borrowers in low-income geographies was consistent with the proportion of owner-occupied housing units but stronger than the aggregate distribution of loans in those geographies. The bank's proportion of residential loans to borrowers in moderate-income geographies was substantially stronger than both the owner-occupied housing units and aggregate distribution of loans.

#### **Small Loans to Businesses**

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

During the evaluation period, the distribution of small loans to businesses in LMI geographies was excellent. The bank's proportion of small loans to businesses in low-income CTs was slightly below the proportion of businesses and aggregate distribution of loans in those geographies. The bank's proportion of loans in moderate-income CTs exceeded both the proportion of businesses and aggregate distribution of loans in those geographies.

In addition to small loans to business, we also evaluated the geographic distribution of SBA PPP loans. Of our total sample, there were no PPP loans located in low-income CTs, but 7 percent of PPP loans were located in moderate-income CTs. This is reasonable, as only 22 percent of all CTs in the AA are LMI.

#### Distribution of Loans by Income Level of the Borrower

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

#### **Home Mortgage Loans**

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

During the evaluation period, the distribution of home mortgage loans to LMI borrowers was reasonable. The bank's proportion of loans to low-income borrowers was significantly below the proportion of low-income families but consistent with the aggregate distribution of loans to those families. The bank's proportion of loans to moderate-income borrowers was below both the proportion of moderate-income families and the aggregate distribution of loans to those families.

#### **Small Loans to Businesses**

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

During the evaluation period, the bank's distribution of small loans to businesses by revenue is reasonable. The bank's proportion of loans was below the proportion of small businesses but near to the aggregate distribution of loans to those businesses.

#### **Responses to Complaints**

There were no complaints related to TGB's CRA performance within Texas.

## **COMMUNITY DEVELOPMENT TEST**

The bank's performance under the CD Test in the state of Texas is rated Satisfactory.

## **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank exhibits reasonable responsiveness to CD needs in the state through CD loans, qualified investments and donations, and CD services, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

#### Number and Amount of CD Loans

The CD Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

	CD 2	Loans		
A		T	otal	
Assessment Area	#	% of Total #	\$(000's)	% of Total \$
Houston MSA	9	90.0	9,224	98.5
Broader Statewide	1	10.0	137	1.5

The level of CD loans was reasonable. TGB originated nine loans to six borrowers totaling \$9.2 million. These loans helped meet community credit needs by supporting affordable housing and organizations that provide community services to LMI individuals. TGB also responded to revitalization and stabilization needs for LMI CTs. TGB originated one affordable housing loan in a moderate-income CT that was outside of the AA.

#### Number and Amount of Qualified Investments

	Pric	or Period*	Curr	ent Period	Total					
Assessment Area	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$		
Houston MSA	1	796	13	16	14	100.0	812	100.0		

\* Prior Period refers to investments made in a previous evaluation period that are outstanding as of the examination date.

The level of CD investments and donations was reasonable. TGB continues to hold one prior-period investment that provided affordable housing to LMI individuals totaling \$796,000. Additional contributions included 13 donations to five organizations totaling \$16,000. Most of these donations assisted organizations providing community services to LMI individuals.

#### Extent to Which the Bank Provides CD Services

Bank involvement through CD services is reasonable, as the COVID-19 pandemic greatly impacted the ability of banks to provide services. In the Houston MSA AA, bank employees provided 217 service hours to four organizations. Most of these organizations provide community services that benefit LMI individuals. Using their financial expertise, one employee held a leadership position through board membership to an organization that provided financial education or job-specific training.

# **Appendix A: Scope of Examination**

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

Time Period Reviewed: Lending & CD Tests	1/01/2018 - 12/31/2020	
Bank Products Reviewed:	Home mortgage, small busine CD loans, qualified investmen	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of	of Examination	
<b>Rating and Assessment Areas</b>	Type of Exam	Other Information
State - TEXAS		
Houston MSA	Full-scope	

# **Appendix B: Summary of State Ratings**

	RATINGS T	exas Gulf Bank, NA	
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Rating
	Satisfactory	Satisfactory	Satisfactory
State:			
Texas	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and CD Test carry equal weight in the overall rating.

## **Appendix C: Definitions and Common Abbreviations**

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

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

**Aggregate Lending (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/AA.

**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. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, CTs 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 non-MSA 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.

**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 CT delineated by the U.S. Bureau of the Census in the most recent decennial census.

**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 CT 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/AA 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 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 income above, and half below, a range of income above, and half of the families have income above, and half below, a range of income above, and half below, a range of income above, and half below, a range of income above.

**Metropolitan Division (MD):** 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 MD consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

**Rating Area:** A rated area is a state or multistate MSA (MMSA). 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 MMSA, the institution will receive a rating for the MMSA.

**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 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.

## **Content of Standardized Tables**

A separate set of tables is provided for each state. All multistate metropolitan statistical areas (MMSA), 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 are treated as originations; and (2) "aggregate" is the percentage of the aggregate number of reportable loans originated by all HMDA or CRA-reporting lenders in the AA. Deposit data are compiled by the Federal Deposit Insurance Corporation and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

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

## TEXAS

																		2018-20
Tot	tal Home N	Mortgage	e Loans	Low-l	ncome	Tracts	Moderate-Income Tracts			Middle-Income Tracts			Upper-	Income	Tracts	Not Available-Income Tracts		
Assessment Area #	\$		Overall Market	% of Owner- Occupied Housing Units	% Bank Loans	Aggregate			Aggregate		% Bank Loans	Aggregate	% of Owner- Occupied Housing Units		Aggregate		% Bank Loans	Aggregate
Houston MSA 91	39,396	100.0	50,243	2.2	2.2	1.5	9.4	19.8	7.3	37.0	45.1	33.8	51.1	33.0	57.1	0.3	0.0	0.2
Total 91	39,396	100.0	50,243	2.2	2.2	1.5	9.4	19.8	7.3	37.0	45.1	33.8	51.1	33.0	57.1	0.3	0.0	0.2

	Tot	al Home N	Mortgage	e Loans	Low-In	come Bo	orrowers		lerate-In Borrowe		Middle-Income Borrowers		Borrowers	Upper-In	ncome B	orrowers	Not Available-Income Borrowers		
Assessment Area	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Houston MSA	91	39,396	100.0	50,243	19.2	2.2	2.0	14.5	2.2	11.7	17.0	12.1	18.9	49.3	76.9	48.5	0.0	6.6	19.0
Total	91	39,396	100.0	50,243	19.2	2.2	2.0	14.5	2.2	11.7	17.0	12.1	18.9	49.3	76.9	48.5	0.0	6.6	19.0
Source: 2015 A Due to roundin	ICS Ce	nsus; 01/0	1/2018 -	12/31/202								12.1	10.7	т7.3	10.7	<b>10.</b> 3	0.0	0.0	17.

Charter Number: 10420

	Total Loans to Small Businesses Low-Income Tracts		Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts							
Assessment Area # Houston	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Houston MSA	43	24,310	90.7	35,386	5.5	2.3	6.7	10.9	14.0	11.3	26.9	44.2	28.0	56.1	39.5	53.5	0.6		0.4
PPP	14	2,503	9.3			0.0			7.1			42.9			50.0			0.00	
Total	57	26,813	100.0	35,386	5.5		6.7	10.9		11.3	26.9		28.0	56.1		53.5	0.6		0.4

Table R: Assessment Area	Distribution	n of Loans t	o Small Bus	inesses by G	Fross Annual	Revenues					2018-20	
	Т	otal Loans to S	Small Business	es	Businesses	with Revenues	s <= 1MM	Businesses wit 1M		Businesses with Revenues Not Available		
Assessment Area	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Houston MSA	43	24,310	100.0	35,386	87.1	34.9	43.8	5.2	30.2	7.7	34.9	
Total	43	24,310	100.0	35,386	87.1	34.9	43.8	5.2	30.2	7.7	34.9	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%