## **PUBLIC DISCLOSURE**

February 14, 2023

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Trinity Bank, National Association Charter Number: 24397

> 3500 W Vickery Boulevard Fort Worth, TX 76107

Office of the Comptroller of the Currency

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

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

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# **Overall CRA Rating**

### Institution's CRA Rating: This institution is rated Satisfactory.

### The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test is based on performance in the Tarrant County assessment area (AA), the bank's only AA.
- The bank's Loan-to-Deposit (LTD) is reasonable.
- A majority of the bank's loans are inside the AA.
- The geographic distribution of loans across geographies of different income levels is reasonable.
- The distribution of loans to businesses of different sizes is reasonable.
- There were no Community Reinvestment Act (CRA) related complaints during the evaluation period.

## Loan-to-Deposit Ratio

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

The LTD is calculated on a bank-wide basis. The bank's quarterly LTD ratio during the evaluation period averaged 71 percent, with a quarterly average high of 79 percent and a quarterly low of 63.6 percent. We compared the bank's LTD ratio to similarly situated institutions operating in the area with assets ranging from \$200 million to \$749 million. The quarterly average LTD ratio for banks in this peer group was 75.9 percent with a high average ratio of 83.4 percent and a low average ratio of 69.5 percent; demonstrating the bank's LTD ratio is generally comparable to peer performance. Moreover, the bank's LTD ratio improved from the 2020 CRA evaluation wherein the bank's average LTD ratio was 63.3 percent.

## Lending in Assessment Area

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

The bank originated and purchased 78 percent of its total loans by number and 71.8 percent by dollar amount inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Out	side of the	e Assessi	ment Area							
	N	lumber o	of Loans			Dollar A	_			
Loan Category	Inside Outside				Total	Insid	e	Outsic	Total	
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Small Business	39	78.0	11	22.0	50	4,769	71.8	1,877	28.2	6,646
Total	39	78.0	11	22.0	50	4,769	71.8	1,877	28.2	6,646

## **Description of Institution**

Trinity Bank N.A. (Trinity) is an intrastate community bank headquartered in Fort Worth, Texas. The bank was established in 2003 and is independently owned by the bank's President, Jeff Harp, and a varied group of investors. The bank does not have a holding company.

Trinity provides traditional banking services to the public from its sole Fort Worth office, with a focus on small and medium sized businesses within its Tarrant County AA. Bank lobby services are provided Monday through Friday from 9:00am to 4:00pm, with hours extended to 5:00pm on Friday. The drive-up facility operates Monday through Friday from 7:30am to 5:30pm. The bank does not operate any Automated Teller Machines (ATM) but has a contract with MoneyPass that allows bank customers to use any ATM that is part of this network, surcharge-free. Trinity offers online banking at <u>www.trinitybk.com</u>. The online banking service provides access to account information, online transfers between accounts, and bill pay services. Deposit products are also traditional and include products for individuals and businesses. Trinity did not engage in any merger or acquisition activity during the assessment period.

Trinity's strategic focus is to continue to strengthen the relationship-based banking services it already provides to small and medium sized businesses within Tarrant County while attracting new lending opportunities. The bank's primary lending products involve commercial and industrial, including a significant volume of working capital lines of credit, and commercial real estate lending. While the bank originates residential mortgage and consumer loans, volumes are minimal and are primarily accommodation loans provided to existing commercial customers. The bank is not subject to the data reporting requirements pursuant to the Home Mortgage Disclosure Act (HMDA) due to limited mortgage production and bank management does not actively market loans to consumers. The bank's sole location is not particularly visible from major thoroughfares; therefore, there is very little foot traffic in the bank. Commercial clientele comprises a significant portion of the bank's deposit base, which has been cultivated and maintained for years through the personal outreach efforts of the management team and the senior lending staff.

At the end of our evaluation period, the bank reported total assets of \$431.8 million, total deposits of \$386.1 million, and Tier 1 capital of 43.1 million as of December 31, 2021. Loans and leases totaled \$249.7 million, which represents 57.8 percent of total assets. Outstanding loans by category include commercial and industrial loans at 58.3 percent, commercial real estate loans at 24.1 percent, construction loans at 11.3 percent, 1-4 family mortgage loans at 4 percent, loans secured by farmland at 2.3 percent, and consumer loans at less than one percent. Investment securities totaled \$137.4 million which represents 31.8 percent of total assets.

During the evaluation period, the bank also offered the Small Business Administration's Payroll Protection Program (PPP) loans, which was enacted as part of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) to aid small businesses in order to maintain payroll cost, avoid layoffs or salary reductions, and keep their businesses operational. During the evaluation period, the bank extended 429 PPP loans totaling \$77.6 million.

There are no legal, financial or other factors impeding the bank's ability to meet the credit needs of the AA during the evaluation period. The prior CRA evaluation was dated February 24, 2020 and the bank received a "Satisfactory" rating.

## **Scope of the Evaluation**

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

Trinity was evaluated under the Small Bank CRA evaluation procedures. As such, this Performance Evaluation (PE) assesses the bank's performance solely under the Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of the AAs through its lending activities. The evaluation period for this examination is from January 1, 2020, to December 31, 2021. We did not incorporate 2022 calendar year performance due to changes associated with the 2020 census coupled with the unavailability of 2022 aggregate peer lending data at CRA evaluation commencement.

In evaluating the bank's lending performance, we identified small business loans as the bank's primary loan product. We analyzed a sample of 39 small business loans originated inside the AA during the evaluation period. This sample was inclusive of commercial & industrial (including PPP) and commercial real estate loan categories.

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

In each state where the bank has an office, one or more of AAs within that state was selected for a fullscope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (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.

Trinity has delineated one AA that includes all of Tarrant County, Texas. Tarrant County is part of the Fort Worth-Arlington-Grapevine, Texas Metropolitan Division. The county consisted of 357 census tracts (CTs) for the 2020-2021 period, which includes 47 low-income CTs, 92 moderate-income CTs, 113 middle-income CTs, 104 upper-income CTs, and one CT with an unknown income designation. The bank has properly defined its AA in accordance with the technical requirements of the CRA regulation. The AA consists of whole CTs, does not arbitrarily exclude LMI CTs, and includes CTs where the bank offices are located, and the majority of its loans are originated. The AA does not reflect illegal discrimination.

Refer to the "Scope" section under each 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 based entirely on the full scope review of the bank's AA. Trinity operates in one state and the State Rating is based on the performance in the bank's only AA. Because small business lending is the bank's only primary product, no product weighting was used in the analysis. Refer to the "Scope" section under each state rating section, if applicable, 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) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any 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 (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: Satisfactory

The major factors that support this rating include:

- Trinity's LTD is reasonable, reflecting responsiveness to credit needs in the community.
- A majority of the bank's loans, 78 percent by number and 71.8 percent by dollar, were made inside the AA.
- The geographic distribution of loans across geographies of different income levels is reasonable.
- The borrower distribution of loans to businesses of different sizes is reasonable.

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

Trinity operates in one AA, Tarrant County, in the State of Texas as described in the "Description of Institution" and the "Scope of the Evaluation" sections of this Performance Evaluation. Trinity conducts business with the general public from its sole location in Fort Worth, Texas. The bank's primary lending focus continues to be commercial and industrial lending, followed by commercial real estate. Home mortgage and consumer products are offered on an accommodative basis to support its commercial-oriented customer base.

Local competition is intense and includes national and super-regional financial institutions. As of June 30, 2022, Trinity has less than one percent of total deposit market share and ranks 29<sup>th</sup> out of 89 financial institutions. Competitors with significant deposit market share include JPMorgan Chase Bank, N.A. (22.53 percent); American Airlines Federal Credit Union (10.86 percent); Bank of America, N.A. (10.37 percent); and Wells Fargo Bank, N.A. (9.87 percent). Trinity maintains a minimal physical presence in Tarrant County; operating only one office out of the 421 bank offices located in the County. Institutions with the largest branch presence in the Fort Worth market include JPMorgan Chase Bank, N.A. (50); Wells Fargo Bank, N.A. (48); and PNC Bank, N.A. (34).

We considered information from two previously conducted community contacts for the purpose of determining a community profile, identifying opportunities for participation by local financial institution, and determining the performance of local financial institutions in meeting the credit needs of the community. Overall economic conditions proved resilient to the economic impacts of COVID-19 lockdowns and the Tarrant County market continues to experience economic growth, net migration to the area, and increasing real estate values. Tarrant County continues to exhibit a robust, well-diversified economy, with a heavy retail presence. The largest employers include American Airlines, Lockheed Martin, and local school districts and hospitals. However, housing values have increased at a faster pace than working class wages, resulting in a need for affordable housing options for LMI individuals. Community contacts reported that local financial institutions are initiating responses to help address home affordability issues. Moreover, community contacts indicated that more could be done by local institutions to meet small business funding needs. One community contact highlighted opportunities for rehabilitation loans to improve deteriorating commercial property to provide additional office space for local small

businesses. Moreover, financial literary programs were also identified as a community development need, with particular emphasis on educating local small business owners.

Additional demographic information on the institution's Tarrant County AA is summarized in the table below.

Tarrant	County	AA
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Table A – Der	•			ient Area					
Assessment Area: Trinity Bank 2021									
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #			
Geographies (Census Tracts)	357	13.2	25.8	31.7	29.1	0.3			
Population by Geography	1,914,526	10.1	24.4	32.5	33.0	0.0			
Housing Units by Geography	732,985	10.0	24.5	33.0	32.5	0.0			
Owner-Occupied Units by Geography	410,486	5.2	18.8	34.4	41.5	0.0			
Occupied Rental Units by Geography	263,251	15.6	31.9	32.1	20.4	0.0			
Vacant Units by Geography	59,248	18.3	31.0	27.4	23.2	0.0			
Businesses by Geography	182,137	6.3	20.6	27.3	45.6	0.1			
Farms by Geography	3,184	4.3	18.1	29.8	47.8	0.0			
Family Distribution by Income Level	466,070	23.1	16.3	19.3	41.3	0.0			
Household Distribution by Income Level	673,737	24.0	16.3	18.3	41.4	0.0			
Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX		\$69,339	Median Housi	ng Value		\$155,983			
			Median Gross	Rent		\$940			
			Families Belov	w Poverty Lev	vel	11.6%			

(\*) The NA category consists of geographies that have not been assigned an income classification.

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

A full-scope review was performed on the bank's Tarrant County AA for the evaluation period covering January 1, 2020, to December 31, 2021.

## **Lending Test**

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

### **Conclusions for Tarrant County AA Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Tarrant County AA is adequate.

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

The bank exhibits reasonable geographic distribution of loans in the State.

#### Small Loans to Businesses

During the evaluation period, the geographic distribution of small loans to businesses is reasonable. The bank's percentage of small business loans located in low-income geographies exceeds both the percentage of businesses and the aggregate lending data in these geographies. Conversely, the percentage of small business loans located in moderate-income geographies is somewhat lower than percentage of businesses in these tracts and aggregate lending performance. This performance is reasonable overall when considering the significant competition encountered within the AA coupled with the bank's limited branching network; potentially limiting opportunities in penetrating moderate-income CT clusters located in the eastern portion of Tarrant County.

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

#### Lending Gap Analysis

The bank's loan originations in LMI geographies during the performance evaluation period did not reflect any unexplained conspicuous lending gaps.

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

The bank exhibits reasonable distribution of loans to businesses of different sizes, given the product lines offered by the bank and community credit needs.

#### Small Loans to Businesses

During the evaluation period, the distribution of small loans to business is reasonable. The bank's percentage of loans to businesses with annual revenues of \$1 million or less is below the reported percentage of small businesses in the AA. However, the bank's percentage of loans to businesses with annual revenues of \$1 million or less slightly exceeds the aggregate lending performance in the AA.

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 and purchases of small loans to businesses.

#### **Responses to Complaints**

Trinity and the OCC have not received any complaints regarding CRA over the evaluation period.

## **Appendix A: Scope of Examination**

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

Time Period Reviewed:	01/01/2020 to 12/31/20	21
Bank Products Reviewed:	Small Business	
List of Assessment Areas and Typ	e of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
State		
Texas		
Tarrant County AA	Full-scope	Entire County; which includes 357 census tracts for 2020-2021 period.

# Appendix B: Summary of MMSA and State Ratings

RATINGS Trinity Bank, N.A.								
Overall Bank:	Lending Test Rating							
Trinity Bank, N.A.	Satisfactory							
MMSA or State:								
Texas	Satisfactory							

## **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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**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.

**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.

## **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 are treated 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 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 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<br/>- Compares the percentage distribution of the number of small loans (loans less than or equal<br/>to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million<br/>or 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 is<br/>available.

	To	tal Loans to S	Small B	usinesses	s Low-Income Tracts		Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	\$		Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Trinity 2020-2021	39	4,768,913	100.0	57,936	6.4	12.8	6.9	20.6	15.4	21.2	27.3	10.3	26.9	45.6	61.5	45.0	0.1		0.0
Total	39	4,768,913	100.0	57,936	6.4	12.8	6.9	20.6	15.4	21.2	27.3	10.3	26.9	45.6	61.5	45.0	0.1		0.0

Table R: Assessment	it Area Distrid	ution of Lo	ans to Sn	iali Busin	esses by G	ross Ann	uai Reven	ues			2020-2
Assessment Area:		Total Loans to S	Small Business	ses	Businesses	with Revenue	s <= 1MM	Businesses wi > 1M		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Trinity 2020-2021	39	4,768,913	100.0	57,936	87.6	46.2	42.9	3.7	48.7	8.7	5.1
Total	39	4,768,913	100.0	57,936	87.6	46.2	42.9	3.7	48.7	8.7	5.1