



## **PUBLIC DISCLOSURE**

May 05, 2025

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

American First National Bank  
Charter Number: 23521

9999 Bellaire Boulevard  
Houston, TX 77036

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 Outstanding.

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

Performance Levels	AFNB Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		X
High Satisfactory		X	
Low Satisfactory			
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 reflected excellent responsiveness to credit needs in all assessment areas (AAs).
- Excellent geographic distribution of loans in a majority of AAs.
- Excellent distribution of loans among individuals of different income levels and business of different sizes in all AAs.
- Excellent levels of community development (CD) loans in all AAs, which had a positive effect on Lending Test performance.

### Investment Test

- Good volume of qualified investments in a majority of AAs.
- Adequate volume of qualified investments in remaining AAs.

### Service Test

- Service delivery systems were readily accessible to geographies and individuals of different income levels in all AAs when considering the additional access to retail banking services through alternative delivery systems (ADS) including telephone and internet banking, mobile deposit, and peer-to-peer (P2P) transfers through Zelle.
- Bank employees provided an adequate level of CD services in a majority of AAs and a relatively high level in the remaining AAs.

## Lending in Assessment Area

A high percentage of the bank's loans are in its AAs.

The bank originated 83 percent of total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

Table 1: Lending Inside and Outside of the Assessment Area										2022 - 2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	109	80.15	27	19.85	136	104,833	84.40	19,374	15.60	124,207
Small Business	730	83.33	146	16.67	876	255,718	78.82	68,712	21.18	324,430
Total	839	82.91	173	17.09	1,012	360,551	80.37	88,086	19.63	448,637
Source: 1/1/2022 - 12/31/2024 Bank Data. Due to rounding, totals may not equal 100.0%										

Source: 1/1/2022 - 12/31/2024 Bank Data. Due to rounding, totals may not equal 100.0%

## Description of Institution

AFNB is an interstate community bank headquartered in Houston, Texas. The bank was chartered on May 18, 1998, and is owned by AFNB Holdings, Inc., a single bank holding company in Nevada. As of December 31, 2024, assets totaled \$2.7 billion and AFNB employed 247 full-time employees. There were no legal or financial factors impeding AFNB's ability to meet the credit and CD needs of its AAs. AFNB was rated "Outstanding" at the last Community Reinvestment Act (CRA) evaluation dated April 11, 2022.

AFNB had three rating areas with one AA in California, one AA in Nevada, and two AAs in Texas. There were 20 locations and 14 automated teller machines (ATMs). For branches with no ATM, AFNB refunds customers with accounts at those branches for any fees incurred while using non-proprietary ATMs. There have been no changes in branching or corporate structure since the last CRA evaluation.

As of December 31, 2024, loans represented 87 percent of total assets, and the loan-to-deposit ratio was 101 percent. Tier 1 capital totaled \$347.2 million or 13 percent of average total assets. The bank's primary lending strategy is commercial real estate (CRE) and commercial and industrial (C&I) loans. Real estate loans totaled \$2.2 billion or 92 percent of total loans, while C&I loans totaled \$192.5 million or 8 percent of total loans. AFNB is not a mortgage lender but provides multifamily and 1-4 family residential loans for investors of rental property. Consumer loans were negligible at \$3.7 million or 0.15 percent of total loans. Deposit services included personal and business checking and savings accounts, as well as online banking, bill payment, remote deposit capture, telephone banking, and mobile banking services.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

The evaluation period for the Lending, Investment, and Service Tests was January 1, 2022, through December 31, 2024. For the Lending Test, examiners reviewed all reported loans subject to the Home Mortgage Disclosure Act (HMDA) and CRA reporting requirements. Home mortgage lending is not a major loan category as this category represented 4 percent by dollar and 10 percent by number of all loan originations during the evaluation period. Examiners analyzed home mortgage loans for AAs where the bank originated at least 20 home mortgage loans.

Examiners compared bank lending performance to peer using 2023 aggregate data and 2024 demographic information unless otherwise stated. Small business loans held more weight as those loans accounted for 87 percent by number of all reported loan originations.

For the Investment Test, examiners considered investment volume compared to tier 1 capital. For the Service Test, examiners considered the location of branches in middle- and upper-income geographies and gave qualitative weight to branches that were near to low- and moderate-income geographies.

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

In each state where the bank has an office, one or more AA(s) within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable 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 each State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The MMSA and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the combination of conclusions in those AAs. Refer to the “Scope” section under each MMSA and State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

The state of Texas represented 70 percent of total bank deposits as of December 31, 2024, and therefore carried more weight in the overall conclusions.

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

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks 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 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 California

**CRA rating for the State of California:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflected excellent responsiveness to AA credit needs;
- A good geographic distribution of loans in AA.
- An excellent distribution of loans among individuals of different income levels and business of different sizes;
- A leader in making CD loans;
- A good level of qualified investments and grants;
- Readily accessible service delivery systems; and,
- An adequate level of CD services.

### Description of Institution's Operations in California

AFNB operated three branches and one loan production office (LPO) in California. The only designated AA was Los Angeles County, which comprised the Los Angeles-Long Beach-Glendale, CA (Los Angeles) Metropolitan Division (MD). The Los Angeles MD was a subset of the greater Los Angeles-Long Beach-Anaheim, CA MSA.

As of December 31, 2024, the state of California represented 16.7 percent of total bank deposits and 14.7 percent of reported loan originations. Based on FDIC deposit market share data as of June 30, 2024, AFNB held deposits totaling \$387 million, which represented 0.02 percent market share in the state.

In the Los Angeles MD, the market share was 0.08 percent and ranked the bank 51 of 92 institutions. Major competitors in the area include JPMorgan Chase, NA (Chase Bank), Bank of America, NA (Bank of America), and Wells Fargo Bank, NA (Wells Fargo). The top three competitors held a combined 47.9 percent market share in Los Angeles County.

### Community Contacts

We identified three community contacts to determine credit and CD needs. Contacts included an economic development organization that assists with loans and investments for projects that will create and retain jobs, a financial literacy organization aimed towards underserved youth and low- and moderate-income communities, and an organization that specializes in assisting low- and moderate-income families with obtaining financing for first-time home ownership and home repairs. Primary community needs identified were affordable housing, rehab financing, employment opportunities, financial literacy, and credit counseling.

## Los Angeles MD

Assessment Area - Los Angeles MD 2024						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,498	6.37	27.78	28.46	34.31	3.08
Population by Geography	10,014,009	5.74	28.24	29.90	34.69	1.43
Housing Units by Geography	3,559,790	5.41	25.44	28.07	39.49	1.59
Owner-Occupied Housing by Geography	1,534,472	1.49	16.14	30.64	51.31	0.42
Occupied Rental Units by Geography	1,798,032	8.81	33.81	26.52	28.45	2.41
Vacant Units by Geography	227,286	5.10	21.92	23.04	46.97	2.98
Businesses by Geography	547,550	3.80	18.53	24.55	50.28	2.83
Farms by Geography	6,660	2.72	17.96	26.32	51.34	1.67
Family Distribution by Income Level	2,211,342	23.88	16.46	17.47	42.18	0.00
Household Distribution by Income Level	3,332,504	25.95	15.02	16.32	42.72	0.00
Unemployment rate (%)	6.45	8.47	7.41	6.24	5.43	10.86
Households Below Poverty Level (%)	14.01	32.32	20.76	12.23	7.73	28.92
Median Family Income (31084 - Los Angeles-Long Beach-Glendale, CA MD)		\$80,317	Median Housing Value			\$559,700
Median Family Income (31084 - Los Angeles-Long Beach-Glendale, CA MD) for 2024		\$98,200	Median Gross Rent			\$1,524
			Families Below Poverty Level			10.51
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

## Scope of Evaluation in California

The OCC identified the only AA in California for full-scope review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CALIFORNIA

### LENDING TEST

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

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

Based on a full-scope review, the bank's performance in the Los Angeles MD was excellent.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							2022 - 2024	
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Los Angeles MD	20	103	0	10	0	133	99.25	100.00
Broader Statewide or Regional Area (BSRA)	0	0	0	1	0	1	0.75	0
Total	20	103	0	11	0	134	100.00	100.00
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Los Angeles MD	43,799	29,135	0	32,014	0	104,948	97.67	100.00
BSRA	0	0	0	2,500	0	2,500	2.33	0
Total	43,799	29,135	0	34,514	0	107,448	100.00	100.00
Source: 1/1/2022 – 12/31/2024 Bank Data. Due to rounding, totals may not equal 100.0%								

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

AFNB originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy.

According to peer data, AFNB ranked 487 of 767 home mortgage lenders with a negligible market share by number. The market consisted of local and national lenders. The top four lenders held a combined 32.4 percent market share and included megabanks and home mortgage companies

According to peer data, AFNB held less than 0.1 percent market share by number and ranked 85 of 257 small business lenders. The market consisted of local and national lenders. The top four lenders held a combined 75.1 percent market share and were all mega banks and banks that were issuers of small business credit cards. AFNB is not an issuer of small business credit cards.

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

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

#### ***Home Mortgage Loans***

Refer to Table 7 in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The geographic distribution of home mortgage loans was excellent. The percentage of bank loans exceeded both the percentage of owner-occupied housing units and aggregate lending in those areas.

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

Refer to Table 9 in the state of California section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small business loans was good. The percentage of bank loans in low-income geographies exceeded both the percentage of businesses and the aggregate lending in those geographies. The percentage of banks loans in moderate-income geographies was below both the percentage of businesses and aggregate lending in those geographies.



### ***Lending Gap Analysis***

We evaluated the lending distribution in the Los Angeles MD and did not identify any unexplained conspicuous gaps.

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

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

### ***Home Mortgage Loans***

Refer to Table 8 in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans is adequate. AFNB did not originate any mortgage loans to low- and moderate-income families but that is reasonable considering the overall business strategy. In the AA, 50 percent of originations were multifamily properties and 30 percent were businesses with 1-4 family rental properties, which require no income reporting. While income information was not available, a moderate portion of the loans were in low- and moderate-income geographies. Additionally, 70 percent of multifamily lending qualified as affordable housing for low- and moderate-income families.

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

Refer to Table 10 in the state of California section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small business loans is excellent. The percentage of bank loans exceeded both the percentage of small businesses and aggregate lending of all other institutions.

### **Community Development Lending**

The institution was a leader in making CD loans.

Refer to Table 3 in the Lending Activity section for 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.

AFNB originated or renewed 10 CD loans for \$32 million in the Los Angeles MD representing 55 percent of allocated tier 1 capital. CD loans exhibited an excellent level of responsiveness to the credit and community needs in the AA. Lending included seven affordable housing loans totaling \$15.7 million, three economic development loans totaling \$11.5 million, and one revitalization or stabilization loan totaling \$4.8 million.

The following are examples of CD loans the bank originated or purchased in the AA:

- A \$6.2 million loan for a 26-unit affordable housing project that provided Housing Choice Voucher Program subsidies, which helped low-income families, elderly persons, veterans, and disabled individuals afford housing in the private market.
- A \$4.2 million loan for the acquisition of an industrial warehouse, creating at least 29 job opportunities for low- and moderate-income individuals in warehousing and fashion distribution.
- A \$4.8 million loan to renovate a property in support of a city revitalization plan.

### BSRA

In addition to the CD loans that benefited the bank's AA, AFNB made one loan totaling \$2.5 million for an 18-unit multifamily affordable housing complex.

### **Product Innovation and Flexibility**

The institution made little use of innovative and/or flexible lending practices in order to serve AA credit needs.

### **INVESTMENT TEST**

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

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

Based on a full-scope review, the bank's performance in the Los Angeles MD was good.

The institution had a significant level of qualified investments, including grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibited good responsiveness to credit and community development needs. The institution did not use innovative and/or complex investments to support CD initiatives.

Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Los Angeles MD	1	971	37	1,410	38	100.0	2,381	100.0	0	0
<b>Total</b>	1	971	37	1,410	38	100.0	2,381	100.0	0	0

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

AFNB had 38 qualified investments and grants totaling \$2.4 million, which was equivalent to 4 percent of allocated tier 1 capital. The bank made one current period investment totaling \$1.2 million, which consisted of a mortgage-backed security (MBS), and 36 qualified grants totaling \$177,000. The AA also benefited from the ongoing impact of a prior-period investment with an outstanding balance of \$971,198. Investments were responsive to affordable housing needs, community services to low- and moderate-income communities, and economic development support.

The following are examples of qualified investments in the AA:

- \$30,000 in grants to a nonprofit focused on affordable housing. The organization leveraged its programs to strengthen communities by developing and maintaining quality affordable housing, creating and preserving affordable homeownership opportunities, providing financial education, and increasing the financial independence of low- and moderate-income families.
- \$19,000 in grants to a national nonprofit supporting community development in cities and rural areas throughout the country. The local office invested in affordable housing, economic development, health and recreation, capacity building, and strategic planning efforts.
- \$15,000 in grants to a city and regional nonprofit that provided resources to address food insecurities in low- and moderate-income communities. Additionally, the organization conducted hunger and nutrition education and awareness programs within the community.

## SERVICE TEST

The bank's performance under the Service Test in California is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Los Angeles MD was excellent.

## Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.

Table 5: Distribution of Branch Delivery Systems										2022 - 2024				
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	NA	
Los Angeles MD	100.00	3	100.00	0.00	33.33	33.33	33.33	0.00	5.74	28.24	29.90	34.69	1.43	
Total	100.00	3	100.00	0.00	33.33	33.33	33.33	0.00	5.74	28.24	29.90	34.69	1.43	
Source: FFIEC File - 2020, 2024 Census														
1/1/2022 - 12/31/2024 Bank Data														
Due to rounding, totals may not equal 100.0%														

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

AFNB operated one branch each in moderate-, middle-, and upper-income geographies. The LPO was located in a moderate-income geography. There were no branches in low-income geographies, but this is reasonable based on population levels. Additionally, the branch located in a middle-income geography is near to low- and moderate-income geographies, which improved access and had a positive impact on branch distribution.

ADS enhanced the delivery of banking services to geographies and individuals of all income levels by increasing access to banking activities. Of all customer accounts registered for mobile and online banking as of December 31, 2024, 62 percent were associated with the moderate-income branch. Of all users during the evaluation period, 1 percent were located in low-income geographies, and 6 percent were located in moderate-income geographies. There were no ATM locations in the AA.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Los Angeles MD	0	0	0	0	0	0	0
<b>Total</b>	0	0	0	0	0	0	0

1/1/2022 - 12/31/2024 Bank Data.

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

The bank did not open or close any branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals.

All branches offered convenient lobby hours Monday through Friday but no drive-thru access. Services included traditional banking services such as checking/savings accounts, check cashing, money orders, and cashier's checks. The bank also provided commercial services, wire transfers, and international trade products and services. Based on the market area, AFNB offered multilingual services at all branches. The LPO offered loan products with convenient lobby hours Monday through Friday.

## Community Development Services

The institution provided an adequate level of CD services.

During the evaluation period, 22 bank employees volunteered 275 hours of technical assistance and financial education to four different nonprofit organizations. The CD services were responsive in helping the bank address community needs.

The following are examples of qualified services in the AA:

- 14 bank employees volunteered 133 hours to the volunteer income tax assistance program conducted by a nonprofit organization. Employees provided free tax preparation services to county residents. Organization programs included social services, educational workshops, and community outreach supporting low- and moderate-income individuals and families.
- Two bank employees participated for 84 hours in a coalition that brought together banks, community-based organizations, and government agencies. The coalition promoted economic inclusion by increasing access to safe, affordable, and sustainable financial products and services for low- and moderate-income individuals. The employees supported and presented at the coalition's small business and home buying workshops, in addition to participating in various working groups.

## BSRA

In addition to the CD services that benefited the bank's AA, eight employees provided 56 hours of technical assistance and financial education to two different nonprofit organizations that provided financial stability, education, and housing assistance. Programs included workforce training, early childhood education programs, and emergency financial support to help low- and moderate-income families achieve long-term economic security.

## State Rating

### State of Nevada

**CRA rating for the State of Nevada:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** High Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans among individuals of different income levels and business of different sizes;
- A significant level of CD loans;
- A good level of qualified investments and grants;
- An adequate level of CD services; and,
- Readily accessible service delivery systems.

### Description of Institution's Operations in Nevada

AFNB operated four branches in Nevada. The only AA included Clark and Nye counties, which comprise the greater Las Vegas-Henderson, NV (Las Vegas) CSA. Clark County was the primary market area and included Las Vegas and Henderson, NV. Nye County was a rural adjacent non-MSA county with approximately 92 percent of land under government control; however, many of the population commuted to Clark County for work.

The state of Nevada represented 13.2 percent of bank-wide deposits and 7.7 percent of reported loan originations. According to FDIC deposit market share report as of June 30, 2024, AFNB held deposits of \$305 million, which represented 0.27 percent market share and ranked the bank 23 of 51 institutions. Within the Las Vegas CSA, the market share was 0.33 percent share and ranked the bank 17 of 43 institutions. The largest depository institutions were Bank of America, Wells Fargo, Wells Fargo National Bank West, Beal Bank USA, and Chase Bank, which held a combined 66.3 percent market share.

### Community Contacts

We contacted two community organizations to determine local credit and community needs. One was an organization focused on supporting small business development through free advising, workshops, training, and market analyses. The contact highlighted challenges such as labor shortages, high inflation, securing financing, and developing market strategies for businesses. The other organization served as a resource for developers and new businesses looking to expand in the area. The contact identified a need for increasing access to small business loans and grants, as some banks are hesitant to ease lending criteria. The contact also identified opportunities for financial institutions to fund non-profit organizations that help small businesses with resources and education.

## Las Vegas CSA

Assessment Area(s) - Las Vegas CSA 2024						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	550	7.09	24.73	38.73	28.73	0.73
Population by Geography	2,317,052	6.88	24.53	39.55	28.83	0.21
Housing Units by Geography	934,913	6.97	25.18	38.99	28.65	0.22
Owner-Occupied Housing by Geography	457,018	2.56	16.84	42.63	37.78	0.19
Occupied Rental Units by Geography	371,261	11.84	34.03	36.64	17.31	0.18
Vacant Units by Geography	106,634	8.89	30.06	31.59	29.03	0.43
Businesses by Geography	89,807	4.25	26.42	34.17	34.88	0.28
Farms by Geography	1,635	4.77	30.09	32.97	31.99	0.18
Family Distribution by Income Level	528,610	21.09	18.19	20.21	40.51	0.00
Household Distribution by Income Level	828,279	23.29	17.15	18.26	41.31	0.00
Unemployment rate (%)	4.42	5.54	5.19	4.59	3.32	2.36
Households Below Poverty Level (%)	12.83	30.34	20.52	9.89	6.21	15.47
Median Family Income (29820 - Las Vegas-Henderson-North Las Vegas, NV MSA)		\$71,896	Median Housing Value			\$260,300
Median Family Income (Non-MSAs - NV)		\$76,123	Median Gross Rent			\$1,251
Median Family Income (29820 - Las Vegas-Henderson-North Las Vegas, NV MSA) for 2024		\$87,800	Families Below Poverty Level			9.84
Median Family Income (Non-MSAs - NV) for 2024		\$92,500				
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

## Scope of Evaluation in Nevada

Examiners identified the only AA in Nevada for full-scope review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEVADA

### LENDING TEST

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

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

Based on a full-scope review, the bank's performance in the Las Vegas CSA was excellent.

### Lending Activity

Lending levels reflected excellent responsiveness to AA credit needs.

Table 3: Lending Activity							2022 - 2024	
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Las Vegas CSA	10	55	0	7	0	72	100.00	100.00
Total	10	55	0	7	0	72	100.00	100.00
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
Las Vegas CSA	3,260	17,239	0	18,063	0	38,562	100.00	100.00
Total	3,260	17,239	0	18,063	0	38,562	100.00	100.00
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

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

AFNB originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. There were not enough home mortgage loans to perform a meaningful analysis.

According to peer data, AFNB ranked 54 of 182 small business lenders in the CSA with a market share of 0.03 percent by number. The market consisted of local and national lenders. The top five lenders held 75.5 percent of the market and included mega banks and banks that are issuers of small business credit cards. AFNB was not an issuer of small business credit cards.

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

The bank exhibited an excellent geographic distribution of loans in its AA.

#### ***Home Mortgage Loans***

Refer to Table 7 in the state of Nevada section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

There were not enough home mortgage loans for a meaningful analysis.

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

Refer to Table 9 in the state of Nevada section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small business loans was excellent. The percentage of bank loans in both low- and moderate-income geographies exceeded the percentage of businesses and the aggregate lending in those areas.

#### ***Lending Gap Analysis***

The OCC evaluated the lending distribution in the Las Vegas CSA and did not identify any unexplained conspicuous gaps.

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

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

### ***Home Mortgage Loans***

Refer to Table 8 in the state of Nevada section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

There were not enough home mortgage loans for a meaningful analysis.

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

Refer to Table 10 in the state of Nevada section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower distribution of small businesses loans was excellent. The percentage of bank loans was below the percentage of small businesses but exceeded the aggregate lending of other institutions.

## **Community Development Lending**

The institution was a leader in making CD loans.

Refer to Table 3 in the Lending Activity section for 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.

During the evaluation period, AFNB originated or renewed seven CD loans totaling \$18.1 million in the Las Vegas MSA, representing 39.2 percent of allocated tier 1 capital. CD loans exhibited an excellent level of responsiveness to the credit and community needs in the AA. Lending included seven economic development loans.

The following are examples of CD loans the bank originated or purchased in the AA:

- A \$2.8 million loan for the construction of a retail and residential building that will create over 100 permanent jobs for low- and moderate-income individuals. The development will feature 307 residential units along with retail space, gym, spa, and sales area generating a diverse range of employment opportunities.
- A \$2.6 million loan for the construction of a convenience store and gas station expected to create permanent jobs opportunities for low- and moderate-income individuals in retail, fuel service, and store operations.
- A \$1.7 million loan for the acquisition and development of a property into a restaurant and bar that will generate over 20 employment opportunities for low- and moderate-income individuals.



## Product Innovation and Flexibility

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

## INVESTMENT TEST

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

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

Based on a full-scope review, the bank's performance in the Las Vegas CSA was good.

The institution had a significant level of qualified investments, including grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibited good responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives.

Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Las Vegas CSA	1	507	53	1,388	54	100.0	1,895	100.0	0	0
<b>Total</b>	<b>1</b>	<b>507</b>	<b>53</b>	<b>1,388</b>	<b>54</b>	<b>100.0</b>	<b>1,895</b>	<b>100.0</b>	<b>0</b>	<b>0</b>

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

AFNB had 54 qualified investments and grants totaling \$1.9 million, which was equivalent to 4 percent of allocated tier 1 capital. The bank made one current-period investment totaling \$1.2 million, which consisted of a MBS, and 52 qualified grants totaling \$176,700. The AA also benefited from the ongoing impact of a prior-period investment with an outstanding balance of \$506,710. Investments supported community services to low- and moderate-income communities and economic development.

The following are examples of qualified investments in the AA:

- \$25,000 in grants to a nonprofit dedicated to empowering low- and moderate-income individuals with disabilities to gain independence. Programs included workforce development, community employment opportunities, day services, inclusive housing, and arts and social activities.
- \$15,000 in grants allocated to a children's literacy nonprofit committed to promoting early literacy. The organization provided books directly into the hands and homes of children in low-income communities to foster a love of reading and support educational development.
- \$10,000 in grants awarded to a nonprofit food bank that supports low- and moderate-income communities. Programs included emergency food assistance, aimed at supplementing the cost of food for low-income residents during times of need.

## SERVICE TEST

The bank's performance under the Service Test in Nevada is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Las Vegas CSA was excellent.

### Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AA.

Table 5: Distribution of Branch Delivery Systems									2022 - 2024				
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	NA
Las Vegas CSA	100.00	4	100.00	0.00	50.00	50.00	0.00	0.00	6.88	24.53	39.55	28.83	0.21
<b>Total</b>	100.00	4	100.00	0.00	50.00	50.00	0.00	0.00	6.88	24.53	39.55	28.83	0.21

Source: FFIEC File - 2020, 2024 Census

1/1/2022 - 12/31/2024 Bank Data

Due to rounding, totals may not equal 100.0%

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

AFNB operated two branches in moderate-income geographies, which exceeded the population in those geographies. There were two branches in middle-income geographies that were near to low- and moderate-income geographies, which improved access and had a positive impact on branch distribution.

ADS enhanced the delivery of banking services to geographies and individuals of all income levels. These services allowed customers instant access to banking activities from wherever they are located. Of all customer accounts registered for mobile and online banking as of December 31, 2024, 41 percent were associated with moderate-income branches. Of all users during the evaluation period, 4 percent were located in low-income geographies, and 50 percent were located in moderate-income geographies. There were two ATM locations including one moderate-income geography and one middle-income geography.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
Las Vegas CSA	0	0	0	0	0	0	0
<b>Total</b>	0	0	0	0	0	0	0

1/1/2022 - 12/31/2024 Bank Data.

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

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconveniences its AA, particularly in low- and moderate-income geographies and/or individuals.

All branches offered convenient lobby hours Monday through Friday, with drive-thru access. Services included traditional banking services such as checking/savings accounts, check cashing, money orders, and cashier's checks. The bank also provided commercial services, wire transfers, and international trade products and services. Based on the market area, AFNB offered multilingual services at all branches.

## **Community Development Services**

The institution provided an adequate level of CD services.

During the evaluation period, 20 bank employees volunteered 174 hours of technical assistance and financial education to nine different nonprofit organizations. CD services were responsive in helping the bank address community needs and one employee served in a leadership capacity.

The following are examples of qualified services in the AA:

- 16 bank employees volunteered 79 hours conducting financial literacy sessions for a nonprofit organization that provided housing, therapy, and education for children who have been abused, neglected, or are in foster care. The sessions included teaching children how to write checks, fill out deposit slips, and manage spending within a budget. The programs focused on stability, life skills training, and emotional support to help low- and moderate-income youth transition to self-sufficient adulthood.
- An employee contributed 22 hours to a county coalition that provided free medical, dental, and vision care to underserved communities, primarily serving low- and moderate-income individuals. The employee volunteered as the treasurer, responsible for managing the organization's funds.

## State Rating

### State of Texas

**CRA rating for the State of Texas:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Low Satisfactory

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs;
- An excellent geographic distribution of home mortgage and small business loans;
- An excellent distribution of loans among individuals of different income levels and business of different sizes;
- A leader in making CD loans;
- An adequate level of qualified investments and grants;
- A good level of CD services; and,
- Readily accessible service delivery systems.

### Description of Institution's Operations in Texas

AFNB operated 13 locations throughout two AAs. The AAs included the Dallas-Fort Worth-Arlington (DFW) CSA and the Houston-Pasadena-The Woodlands (Houston) MSA. The DFW CSA accounted for 31 percent of statewide deposits and included Collin, Dallas, Denton, and Tarrant counties. The Houston MSA was the most significant AA in the state, which accounted for 69 percent of statewide deposits and included Harris and Fort Bend counties.

The state of Texas represented 70 percent of bank-wide deposits and was AFNB's largest rating area. As of June 30, 2024, deposits totaled \$1.6 billion, which represented 0.11 percent market share and ranked the bank 79 of 475 institutions in Texas. The largest depository institutions were Chase Bank, Charles Schwab Bank, SSB, Bank of America, USAA Federal Savings Bank, and Wells Fargo, which held a combined 58.1 percent market share.

As of June 30, 2024, AFNB held \$1.1 million in deposits, which represented a market share of 0.39 percent or ranked the bank 23 of 90 banks in the Houston MSA. The largest depository institutions were Chase Bank, Wells Fargo, Bank of America, and Zions Bancorporation, NA. Chase Bank held 51.6 percent market share alone.

### Community Contacts

We identified four community contacts in the Houston MSA. All contacts primarily focused on Harris and Fort Bend counties or a combination of multiple counties within the Houston MSA. The contacts included a nonprofit affordable housing developer, CD support organization, community group listening session, and an economic development corporation. The primary needs included financial services and low-cost bank products for the low- and moderate-income community, affordable housing, and financial literacy.

## Houston MSA

Assessment Area(s) - Houston MSA						
2022 - 2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,248	15.30	27.40	24.60	29.57	3.13
Population by Geography	5,553,924	12.05	25.87	27.31	33.08	1.68
Housing Units by Geography	2,056,155	12.92	25.76	26.39	32.90	2.02
Owner-Occupied Housing by Geography	1,090,468	5.62	21.44	29.38	42.70	0.86
Occupied Rental Units by Geography	793,580	21.53	31.21	23.25	20.69	3.32
Vacant Units by Geography	172,107	19.49	28.01	21.97	27.10	3.43
Businesses by Geography	283,703	9.18	21.60	25.57	41.83	1.81
Farms by Geography	5,323	7.04	20.01	29.53	42.10	1.32
Family Distribution by Income Level	1,318,481	24.82	17.03	17.64	40.50	0.00
Household Distribution by Income Level	1,884,048	25.23	16.34	17.01	41.42	0.00
Unemployment rate (%)	4.10	5.12	4.69	4.09	3.28	3.95
Households Below Poverty Level (%)	13.24	30.79	18.40	9.38	5.52	20.50
Median Family Income (26420 - Houston-Pasadena-The Woodlands, TX MSA)	\$81,128	Median Housing Value			\$166,300	
Median Family Income (26420 - Houston-Pasadena-The Woodlands, TX MSA) for 2024	\$97,400	Median Gross Rent			\$1,148	
		Families Below Poverty Level			11.60	
FFIEC File - 2020 Census						
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

## Scope of Evaluation in Texas

Examiners identified the Houston MSA for full-scope review, as it was the most significant AA based on lending and deposit levels. The rating for Texas was based on both full- and limited-scope reviews. 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 Outstanding.

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

Based on a full-scope review, the bank's performance in the Houston MSA was excellent.

### Lending Activity

Lending levels reflected excellent responsiveness to AAs credit needs.

Table 3: Lending Activity								2022 - 2024
Number of Loans								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
DFW MSA	6	107	0	12	0	125	17.53	30.99
Houston MSA	73	465	0	35	0	573	80.36	69.01
BSRA	0	0	0	15	0	15	2.10	0.00
<b>Total</b>	<b>79</b>	<b>572</b>	<b>0</b>	<b>62</b>	<b>0</b>	<b>713</b>	<b>100.00</b>	<b>100.00</b>
Dollar Volume of Loans (\$000s)								
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Consumer	Total	% Rating Area Loans	% Rating Area Deposits
DFW MSA	1,927	38,849	0	19,958	0	60,734	14.58	30.99
Houston MSA	55,847	170,495	0	88,685	0	315,027	75.65	69.01
BSRA	0	0	0	40,658	0	40,658	9.76	0.00
<b>Total</b>	<b>57,774</b>	<b>209,344</b>	<b>0</b>	<b>149,301</b>	<b>0</b>	<b>416,419</b>	<b>100</b>	<b>100.00</b>
Source: 1/1/2022 - 12/31/2024 Bank Data.								
Due to rounding, totals may not equal 100.0%								

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

In the Houston MSA, AFNB originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans exceeded the proportion of bank deposits in the Houston MSA.

According to peer data, AFNB held 0.02 percent market share and ranked 306 of 866 mortgage lenders by number. The peer market consists of local and national lenders, as well as mortgage companies. Based on AFNB's business model, the bank is not a mortgage lender; however, AFNB originates mortgage loans for multifamily properties and 1-4 family investors with a business purpose.

According to peer data, AFNB ranked 51 of 263 small business lenders by number. The peer market consisted of local and national lenders. The top five lenders held 73.8 percent market share and were all megabanks or issuers of small business credit cards.

## Distribution of Loans by Income Level of the Geography

The bank exhibited an excellent geographic distribution of loans in its AA.

### *Home Mortgage Loans*

Refer to Table 7 in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

In the Houston MSA, the geographic distribution of home mortgage loans was excellent. The percentage of bank loans in both low- and moderate-income geographies exceeded the percentage of low- and moderate-income families and aggregate lending in those areas.

### *Small Loans to Businesses*

Refer to Table 9 in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

In the Houston MSA, the geographic distribution of small businesses loans was excellent. The percentage of bank loans in both low- and moderate-income geographies exceeded the percentage of businesses and aggregate lending in those areas.

### ***Lending Gap Analysis***

We did not identify any unexplained conspicuous gaps in the Houston MSA.

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

The bank exhibited an excellent distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

### ***Home Mortgage Loans***

Refer to Table 8 in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In the Houston MSA, the borrower distribution of home mortgage loans was adequate considering when considering the overall business strategy. The percentage of bank loans was below the percentage of low-income families but exceeded the aggregate lending of other institutions. The percentage of bank loans was well below both the percentage of moderate-income families and the aggregate lending of other institutions.

In the AA, 16 percent of originations were multifamily properties and 84 percent were businesses with 1-4 family rental properties, which require no income reporting. While income information was not available, a moderate portion of the loans were in low- and moderate-income geographies. Additionally, 29 percent of the multifamily loans qualified as affordable housing for low- and moderate-income families.

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

Refer to Table 10 in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

In the Houston MSA, the borrower distribution of small business loans was excellent. The percentage of bank loans to small businesses was below the percentage of small businesses but exceeded the aggregate lending of other institutions.

### **Community Development Lending**

The institution was a leader in making CD loans.

Refer to Table 3 in the Lending Activity section for 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.

In the Houston MSA, AFNB originated or renewed 35 CD loans totaling \$88.7 million or 53.4 percent of allocated tier 1 capital. CD loans exhibited an excellent level of responsiveness to credit and community needs in the AA. Lending included 32 economic development loans totaling \$69.5 million, two affordable housing loans totaling \$17.7 million, and one revitalization loan totaling \$1.5 million.

The following are examples of CD loans the bank originated or purchased in the AA:

- A \$2.2 million loan for the redevelopment of a 73-unit apartment complex, which aimed to preserve and improve existing affordable housing options.
- A \$1.6 million loan to finance the establishment of a manufacturing business, which will create jobs for over 20 employees, supporting operations for low- and moderate-income individuals. The business will have significant positive impact on the local economy and community.
- A \$1.6 million loan for the purchase of a convenience store, gas station, restaurant, and retail store. This loan supported the retention of up to 14 jobs for low- and moderate-income individuals.

### BSRA

In addition to CD loans that benefited the bank's AA, AFNB made 15 loans totaling \$40.7 million for economic development in Texas.

## **Product Innovation and Flexibility**

The institution made limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

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

Refer to Tables 7 through 14 in the state of Texas section of appendix D for the facts and data that support the limited-scope conclusions.

Based on a limited-scope review, the bank's performance under the Lending Test in the DFW MSA was consistent with the bank's overall performance under the Lending Test in the full-scope area.

## **INVESTMENT TEST**

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

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

Based on a full-scope review, the bank's performance in the Houston MSA was adequate.

The institution had an adequate level of qualified investments, including grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibited adequate responsiveness to credit and community development needs. The institution rarely used innovative and/or complex investments to support CD initiatives.



Table 4: Qualified Investments*										
Assessment Area	Prior Period		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
DFW MSA	4	3,434	40	192	44	34.38	3,626	39.91	0	0
Houston MSA	5	3,219	79	2,241	84	65.63	5,460	60.09	0	0
Total	9	6,653	119	2,433	128	100.00	9,086	100.00	0	0

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

CD investments were responsive to affordable housing needs, community services to low- and moderate-income communities, and economic development support. In the Houston MSA, AFNB had 84 qualified investments and grants totaling \$5.5 million, which was equivalent to 3.3 percent of allocated tier 1 capital. Current-period investments consisted of \$1.1 million in MBS and \$605,000 in municipal bonds serving low- and moderate-income communities. One factor impacting AFNB's ability to invest additional funds was the strategic decision to reduce exposure to fixed-rate securities in a volatile interest rate environment. Current-period investments still reflected a targeted response to credit needs in intensifying economic conditions while balancing safety and soundness considerations.

The AA also continued to benefit from the ongoing impact of prior-period investments totaling \$3.2 million. The bank retained these investments to continue to support low- and moderate-income communities, particularly at a time when rising interest rates and limited housing inventory constrained private market solutions. Houston experienced an increasing affordable housing strain during the evaluation period, with the median price for single-family homes outpacing household income by at least 30 percent. Since AFNB is not a major originator of homestead loans, investments helped meet affordable housing credit needs in the Houston MSA.

The following are examples of qualified investments in the AA:

- \$125,000 in grants to a nonprofit with a mission to enrich low- and moderate-income families with educational, cultural, and social service programs. Programs included homebuyer education and counseling, English as a second language, senior employment, career and personal financial services, and free tax preparation.
- \$60,000 in grants to a coalition that provided workshops to low- and moderate-income individuals on budgeting, credit management, and homeownership. Bank employees also provided over 1,200 service hours.
- \$60,000 in grants to an organization that offered a range of services for low- and moderate-income individuals and families including senior living communities, family programs, and humanitarian aid. They provided affordable housing and care options for seniors, as well as family programs that support vulnerable children and families through various initiatives. Bank employees also provided 13 service hours.
- \$45,000 in grants to a nonprofit that served as a resource to other nonprofits. Programs include workshops and webinars to develop leaders effectively. These partnerships created opportunities for low- and moderate-income individuals through financial stability services, youth development curriculums, and health care programs.

## Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the DFW MSA was consistent with the bank's overall performance under the Investment Test in the full-scope area.

## SERVICE TEST

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

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

Based on a full-scope review, the bank's performance in the Houston MSA was excellent.

### Retail Banking Services

Service delivery systems were readily accessible to geographies and individuals of different income levels in the institution's AAs.

Table 5: Distribution of Branch Delivery Systems													2022 - 2024	
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	NA	
DFW MSA	69.00	7	53.85	14.29	28.57	57.14	0.00	0.00	9.25	25.73	29.15	34.98	0.89	
Houston MSA	31.00	6	46.15	33.33	16.67	16.67	33.33	0.00	12.05	25.87	27.31	33.08	1.68	
Total	100.00	13	100.00	23.08	23.08	38.46	15.38	0.00	10.52	25.80	28.31	34.12	1.25	
Source: FFIEC File - 2020, 2024 Census														
1/1/2022 - 12/31/2024 Bank Data														
Due to rounding, totals may not equal 100.0%														

Source: FFIEC File - 2020, 2024 Census

1/1/2022 - 12/31/2024 Bank Data

Due to rounding, totals may not equal 100.0%

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

In the Houston MSA, there were two branches in low-income CTs, one in a moderate-income CT, one in a middle-income CT, and two in upper-income CTs. The percentage of branches in low-income geographies exceeded the population in those geographies, while the percentage of branches located in moderate-income geographies was below the population in those geographies. Bank branches located in middle- and upper-income CTs were near to low- and moderate income CTs, which improved access and had a positive impact on branch distribution.

ADS enhanced the delivery of banking services to geographies and individuals of all income levels. These services allowed customers access to banking activities from wherever they are located. Of all customer accounts registered for mobile and online banking as of December 31, 2024, 74 percent were associated with low- and moderate-income branches. Of all users during the evaluation period, 5 percent were located in low-income geographies, and 13 percent were located in moderate-income geographies. All branches had ATMs except one upper-income branch.

Table 6: Distribution of Branch Openings/Closings							
Branch Openings/Closings							
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	NA
DFW MSA	0	0	0	0	0	0	0
Houston MSA	0	0	0	0	0	0	0
<b>Total</b>	0	0	0	0	0	0	0

1/1/2022 - 12/31/2024 Bank Data.

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

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, did not vary in a way that inconveniences its AAs, particularly low- and moderate-income geographies and/or individuals.

All branches offered convenient lobby hours Monday through Friday and all but one branch had drive-thru access. Services included traditional banking services such as checking/savings accounts, check cashing, money orders, and cashier's checks. The bank also provided commercial services, wire transfers, and international trade products and services. Based on the market area, AFNB offered multilingual services at all branches.

## **Community Development Services**

The institution provided a relatively high level of CD services.

In the Houston MSA, 184 bank employees volunteered 1,716 hours of technical assistance and financial education to 23 different nonprofit organizations. CD services were responsive in helping the bank address community needs, with one employee serving in a leadership capacity.

The following are examples of qualified services in the AA:

- 148 bank employees dedicated 1,274 hours to providing financial literacy and credit education for low- and moderate-income individuals. The bank partnered with a coalition that offered workshops on budgeting, credit management, and homeownership. Additionally, a senior bank officer served 83 hours on the board of the organization.
- Two bank employees contributed 16 hours of technical assistance and training to low- and moderate-income individuals through a nonprofit organization, specifically related to technology. The organization focused on equipping individuals with digital literacy skills, computer training, and internet access, empowering them to participate in the modern economy and workforce.
- A senior bank officer provided nine hours of technical service to a nonprofit organization that focused on legal advocacy, research, and education for underserved communities, primarily low-income families. The employee assisted in preparing applications for the Federal Home Loan Bank Heirs Property Program.
- Three bank employees contributed nine hours of technical assistance to a nonprofit organization that provided financial stability, education, and housing assistance. Other programs included workforce training, emergency assistance, and early childhood education programs to help low- and moderate-income families.

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

Based on a limited-scope review, the bank's performance under the Service Test in the DFW MSA was consistent with the bank's overall performance under the Service Test in the full-scope area.

## Appendix A: Scope of Examination

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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”.

<b>Time Period Reviewed:</b>	1/1/2022 – 12/31/2024	
<b>Bank Products Reviewed:</b>	Home mortgage, small business CD loans, qualified investments, CD services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
N/A	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>California</b>		
Los Angeles MD	Full scope	Los Angeles County
<b>Nevada</b>		
Las Vegas CSA	Full scope	Clark and Nye counties
<b>Texas</b>		
DFW MSA	Limited scope	Collin, Dallas, Denton, and Tarrant counties
Houston MSA	Full scope	Fort Bend and Harris counties

## Appendix B: Summary of MMSA and State Ratings

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RATINGS				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
AFNB	Outstanding	High Satisfactory	Outstanding	Outstanding
MMSA or State:				
CALIFORNIA	Outstanding	High Satisfactory	Outstanding	Outstanding
NEVADA	Outstanding	High Satisfactory	Outstanding	Outstanding
TEXAS	Outstanding	Low Satisfactory	Outstanding	Outstanding

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

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

**Community Reinvestment Act (CRA):** the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including low- and moderate-income 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 of this title, and that is not an excluded transaction under 12 CFR 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 CD loans and qualified investments, branch distribution, and CD services).

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

**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.

**Multistate Metropolitan Statistical Area (MMSA):** 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.

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

**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 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 multistate metropolitan statistical area, the institution will receive a rating for the multistate 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.

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

**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

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### 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/AA. 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 7. 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 8. 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/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. 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 AA.
- Table 10. 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.

## CALIFORNIA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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
Los Angeles MD	20	43,799	100.00	297,939	1.49	10.00	1.97	16.14	25.00	17.02	30.64	35.00	28.54	51.31	30.00	51.78	0.42	--	0.69
<b>Total</b>	<b>20</b>	<b>43,799</b>	<b>100.00</b>	<b>297,939</b>	<b>1.49</b>	<b>10.00</b>	<b>1.97</b>	<b>16.14</b>	<b>25.00</b>	<b>17.02</b>	<b>30.64</b>	<b>35.00</b>	<b>28.54</b>	<b>51.31</b>	<b>30.00</b>	<b>51.78</b>	<b>0.42</b>	<b>--</b>	<b>0.69</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Los Angeles MD	20	43,799	100.00	297,939	23.88	--	3.97	16.46	--	5.69	17.47	5.00	12.91	42.18	10.00	53.49	--	85.00	23.94
<b>Total</b>	<b>20</b>	<b>43,799</b>	<b>100.00</b>	<b>297,939</b>	<b>23.88</b>	<b>--</b>	<b>3.97</b>	<b>16.46</b>	<b>--</b>	<b>5.69</b>	<b>17.47</b>	<b>5.00</b>	<b>12.91</b>	<b>42.18</b>	<b>10.00</b>	<b>53.49</b>	<b>--</b>	<b>85.00</b>	<b>23.94</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Los Angeles MD	103	29,135	100.00	824,972	3.80	4.85	3.55	18.53	14.56	19.04	24.55	67.96	26.14	50.28	12.62	48.67	2.83	--	2.60
<b>Total</b>	<b>103</b>	<b>29,135</b>	<b>100.00</b>	<b>824,972</b>	<b>3.80</b>	<b>4.85</b>	<b>3.55</b>	<b>18.53</b>	<b>14.56</b>	<b>19.04</b>	<b>24.55</b>	<b>67.96</b>	<b>26.14</b>	<b>50.28</b>	<b>12.62</b>	<b>48.67</b>	<b>2.83</b>	<b>--</b>	<b>2.60</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM			Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans
Los Angeles MD	103	29,135	100.00	824,972	84.67	95.15	53.19	9.16	3.88	6.18	0.97	0.97
<b>Total</b>	<b>103</b>	<b>29,135</b>	<b>100.00</b>	<b>824,972</b>	<b>84.67</b>	<b>95.15</b>	<b>53.19</b>	<b>9.16</b>	<b>3.88</b>	<b>6.18</b>	<b>0.97</b>	<b>0.97</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

## NEVADA

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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
Las Vegas CSA	103,260		100.00	127,600	2.56	20.00	2.42	16.84	10.00	17.10	42.63	10.00	39.06	37.78	60.00	41.30	0.19	--	0.12
Total	103,260		100.00	127,600	2.56	20.00	2.42	16.84	10.00	17.10	42.63	10.00	39.06	37.78	60.00	41.30	0.19	--	0.12
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Las Vegas CSA	103,260		100.00	127,600	21.09	--	4.28	18.19	--	13.82	20.21	10.00	22.05	40.51	60.00	39.44	--	30.00	20.41
Total	103,260		100.00	127,600	21.09	--	4.28	18.19	--	13.82	20.21	10.00	22.05	40.51	60.00	39.44	--	30.00	20.41
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%																			

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Las Vegas CSA	5517,239	100.00	139,317		4.25	9.09	3.10	26.42	29.09	22.54	34.17	40.00	34.54	34.88	21.82	39.59	0.28	--	0.23
Total	5517,239	100.00	139,317		4.25	9.09	3.10	26.42	29.09	22.54	34.17	40.00	34.54	34.88	21.82	39.59	0.28	--	0.23
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Las Vegas CSA	55	17,239	100.00	139,317	81.98	61.82	50.17	9.13	38.18	8.89	--
Total	55	17,239	100.00	139,317	81.98	61.82	50.17	9.13	38.18	8.89	--
Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

## TEXAS

Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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
DFW MSA	6	1,927	7.59	313,133	4.64	--	3.89	20.12	16.67	14.44	31.05	33.33	34.26	43.80	50.00	46.98	0.39	--	0.43
Houston MSA	73	55,847	92.41	206,100	6.01	9.59	4.55	21.41	28.77	16.06	29.44	23.29	31.31	42.29	34.25	47.23	0.86	4.11	0.86
<b>Total</b>	<b>79</b>	<b>57,774</b>	<b>100.00</b>	<b>519,233</b>	<b>5.25</b>	<b>8.86</b>	<b>4.15</b>	<b>20.70</b>	<b>27.85</b>	<b>15.08</b>	<b>30.33</b>	<b>24.05</b>	<b>33.09</b>	<b>43.12</b>	<b>35.44</b>	<b>47.08</b>	<b>0.60</b>	<b>3.80</b>	<b>0.60</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022 - 2024
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
DFW MSA	6	1,927	7.59	313,133	22.28	--	3.29	17.31	--	12.41	19.05	--	19.66	41.37	33.33	42.92	--	66.67	21.71
Houston MSA	73	55,847	92.41	206,100	24.82	5.48	3.48	17.03	9.59	14.52	17.64	4.11	20.22	40.50	19.18	40.50	--	61.64	21.27
<b>Total</b>	<b>79</b>	<b>57,774</b>	<b>100.00</b>	<b>519,233</b>	<b>23.43</b>	<b>5.06</b>	<b>3.37</b>	<b>17.18</b>	<b>8.86</b>	<b>13.25</b>	<b>18.41</b>	<b>3.80</b>	<b>19.88</b>	<b>40.97</b>	<b>20.25</b>	<b>41.96</b>	<b>--</b>	<b>62.03</b>	<b>21.54</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022 - 2024
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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
DFW MSA	107	38,849	18.71	416,300	5.32	8.41	4.54	19.06	14.95	18.20	29.88	48.60	28.18	44.82	28.04	48.12	0.92	--	0.95
Houston MSA	465	170,495	81.29	355,986	9.18	21.51	8.92	21.60	25.16	19.71	25.57	16.77	24.68	41.83	35.27	45.12	1.81	1.29	1.58
<b>Total</b>	<b>572</b>	<b>209,344</b>	<b>100.00</b>	<b>772,286</b>	<b>7.03</b>	<b>19.06</b>	<b>6.56</b>	<b>20.18</b>	<b>23.25</b>	<b>18.90</b>	<b>27.98</b>	<b>22.73</b>	<b>26.56</b>	<b>43.50</b>	<b>33.92</b>	<b>46.74</b>	<b>1.31</b>	<b>1.05</b>	<b>1.24</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022 - 2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM			Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans
DFW MSA	107	38,849	18.71	416,300	83.48	85.98	51.41	8.34	10.28		8.18	3.74
Houston MSA	465	170,495	81.29	355,986	83.98	73.12	51.97	8.60	26.02		7.41	0.86
<b>Total</b>	<b>572</b>	<b>209,344</b>	<b>100.00</b>	<b>772,286</b>	<b>83.70</b>	<b>75.52</b>	<b>51.67</b>	<b>8.45</b>	<b>23.08</b>		<b>7.85</b>	<b>1.40</b>

Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023, 2024 Dunn & Bradstreet SBSF Demographics, 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

