



PUBLIC DISCLOSURE

September 3, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The American National Bank of Texas
Charter Number: 17043

102 West Moore Avenue
Terrell, TX 75160-3129

Office of the Comptroller of the Currency
Dallas Field Office
225 E. John Carpenter Freeway, Suite 900
Irving, TX 75062

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

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Overall CRA Rating

Institution’s CRA Rating: Satisfactory.

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

Performance Levels	The American National Bank of Texas Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	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:

- The Lending Test rating is based on the bank’s good geographic distribution of loans, good borrower lending distribution, a relatively high level of community development (CD) loan activity, and a high percentage of loans originated within the bank’s assessment areas (AAs). In determining ANBTX’s performance under the lending test, we weighed the bank’s performance in the Dallas MSA AA which represented the bank’s most predominant market in terms of deposit concentrations, branch distribution, and reportable loans.
- The Investment Test rating is based on the significant level of CD investments purchased or originated during the evaluation period and their good responsiveness to the credit and community needs of the bank’s AAs.
- The Service Test rating is based on the accessibility of the bank’s branch offices to borrowers and geographies of different income levels and the relatively high level of CD services completed during the evaluation period.

Lending in Assessment Area

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

The bank originated 83.5 percent of its total loans by number and 78.4 percent by dollar amount inside the bank’s AAs during the evaluation period. This analysis was performed at the bank-wide level, rather than at the respective AA levels.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	1,216	84.4	224	15.6	1,440	269,556	80.00	67,422	20.00	336,978
Small Business	2,650	82.9	548	17.1	3,198	407,745	77.3	120,702	22.7	528,447
Small Farm	165	83.2	33	16.8	198	15,604	78.0	4,327	22.0	19,931
Total	4,031	83.5	805	16.5	4,836	692,905	78.4	192,451	21.6	885,356

Description of Institution

ANBTX is an intrastate community bank headquartered in Terrell, Texas. The bank was established in 1875 and is one of the oldest independently owned banks in Texas. ANBTX is a wholly owned subsidiary of The ANB Corporation, which is a one-bank holding company.

ANBTX's overall market reach encompasses portions of North and East Texas; however, it predominantly operates within the Dallas and Fort Worth metroplex, as well as its surrounding areas. The bank designates the Dallas-Plano-Irving MSA (Dallas AA), Fort Worth-Arlington MSA (Fort-Worth AA), and all of Van Zandt County (Van Zandt AA) as its AAs. Within these three AAs, the bank operates 28 branches; 22 branches of which are located in the Dallas AA, four in the Fort Worth AA, and the remaining two in the Van Zandt AA. A full offering of consumer and business deposit accounts are offered along with a network of thirty-two ATMs. Twenty-seven of the thirty-two ATMs are located within the bank's branch locations or in close proximity to these branch locations. Local branches remain the bank's primary delivery channel for its products and services and each branch location operates practically as a small community bank. Clients of each of the branches are usually located near the branch where their relationship manager offices in. Strategic initiatives are underway to gradually transition the bank from a traditional community bank with only a geographic focus, to one that can thrive in the new digital economy where customers may never physically occupy a banking center.

The bank offers a wide range of loan and deposit products. Lending products offerings include commercial real estate loans, commercial and industrial loans, loans to municipalities, single-family residential mortgages, and consumer loans. The bank sells a large volume of the residential real estate loans it originates, and these sold loans are not reflected in the loan portfolio. ANBTX originated \$8.9 million, and sold \$8.2 million, in 1-4 family residential mortgage loans in the second quarter of 2019, leaving approximately \$688 thousand in mortgage loans held for sale.

As of June 30, 2019, the bank reported total assets of \$3.1 billion, total loans of \$1.9 billion, and total investments of \$849 million. The bank reported total deposits of \$2.8 billion and total capital of \$306.6 million. The bank's loan portfolio breakdown reflects commercial real estate, commercial and industrial, and home mortgage loans as the bank's primary products. As of June 30, 2019, commercial real estate loans comprised 55 percent of the loan portfolio, followed by commercial loans at 21 percent, and mortgage loans at 20 percent. Consumer loans were not a significant portion of the portfolio at 4 percent.

ANBTX remains focused on the needs of the local communities that it serves. Bank employees provide personalized service and abide by the concept “know the customer and meet their needs”. ANBTX’s mission statement to its customers is to build a loyal, mutually profitable relationship, by excelling in understanding the needs and expectations of its clients and delivering superior value. ANBTX will continue to focus on business loans and deposits as its core products, while providing the products of the larger institutions with the service of a community bank.

Competition is strong in the Dallas and Fort Worth AAs with numerous local, regional, and national banks, as well as credit unions, mortgage companies, and non-bank lenders all competing for qualitative lending opportunities within the same market areas. Specifically, in the bank’s Dallas AA, there is heavy competition including several large nationwide banks and regional banks which have established multiple branch locations within the Dallas area and its environs.

There are no legal or financial impediments hindering ANBTX’s ability to meet the credit, investment, or service needs of its AAs. The bank has not been involved in any mergers or acquisitions since our prior CRA performance evaluation.

The bank received a “Satisfactory” rating at the last CRA evaluation dated September 6, 2016. We reviewed the bank’s CRA public file and the OCC consumer complaint records for complaints filed since the previous evaluation. We did not identify any complaints relating to the bank’s CRA performance.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We assessed the bank’s performance in accordance with requirements of the CRA through the Lending, Investment, and Service Tests. We completed the Lending Test by reviewing residential mortgage loan products reported under the Home Mortgage Disclosure Act (HMDA), small loans to businesses reported under the Community Reinvestment Act (CRA), and CD loans either originated or renewed during the evaluation period. We also completed the Investment and Service Tests by evaluating investments, grants, donations, and community services that qualified as CD activities during that same period. The evaluation period for the lending products reported under the HMDA and the CRA, and all CD activities (loans, investments, donations, grants and services) was between August 1, 2016 and December 31, 2018.

In completing the Lending Test, we assessed lending performance using two sets of data reported during respective periods. Lending activities completed in 2016 were evaluated using demographic data garnered from the American Community Survey (ACS) completed in 2010. For lending activities occurring in 2017–2018, we used demographic data collected during the 2015 ACS.

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 assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

ANBTX's three designated AAs are all within the state of Texas. For this evaluation period, we performed a full-scope review of the Dallas and Fort Worth AAs. We completed a limited-scope review for the Van Zandt AA.

Please 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 comprised of the individual AA ratings within the state of Texas. When determining conclusions for ANBTX, we weighted the bank's performance in the Dallas MSA AA most heavily because it represented the bank's most significant market in terms of deposit concentrations, branch distribution, and reportable loans. At June 30, 2019, the Dallas AA represented 86 percent of total deposits. Additionally, at the end of the evaluation period, the Dallas AA accounted for 82 percent of reportable HMDA loan small business and small farm loans originated during the evaluation period. The Fort Worth AA represented 9 percent of the total deposits and 12 percent of the reportable loans while the Van Zandt AA represented 5 percent of the total deposits and 6 percent of the reportable loans. The Dallas AA accounted for 79 percent of the branch network while the Fort Worth and Van Zandt AAs accounted for 14 and 7 percent of the branch network, respectively.

When evaluating the bank's performance under the Lending Test, we placed greater weight on the bank's distribution of small business loans than the distribution of home mortgage loans. We placed significant emphasis on small business loans due to it being the bank's primary loan product in terms of volume and it being in line with the bank's strategic focus. Additionally, information gathered from community contact activities both during this evaluation and from those conducted by other regulatory agencies highlighted small business loans as a primary credit need within the bank's AAs.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

State Rating

State of Texas

CRA rating for the State of Texas: High Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The bank's lending activity is good and reflects good responsiveness to the credit needs of its AAs.
- The bank originates a high percentage of its loans within its designated AAs.
- The bank exhibits a good geographic distribution of loans within its AAs.
- The bank reflects a good distribution of loans to borrowers of different income levels and businesses of different sizes.
- The bank has made a relatively high level of CD loans, which has had a positive impact on the bank's performance under the Lending Test.
- The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.
- The bank's service delivery systems are accessible to geographies and individuals of different income levels in the institution's AAs.
- The bank provides a relatively high level of CD services.

Description of Institution's Operations in Texas

ANBTX operates only within the state of Texas. Of its three AAs, ANBTX's deposit and lending activities are primarily in the Dallas AA where it has \$2.1 billion or 1.04 percent of the deposit market share in the AA and ranks 13th out of 134 other financial institutions. Meanwhile, in the Fort Worth AA, ANBTX has just \$217 million or 0.54 percent of the deposit market share where it ranks 27th against 79 other financial institutions. Finally, ANBTX has \$120 million or 17.39 percent of the deposit market share in the Van Zandt AA making it the fourth largest depositor out of nine other financial institutions in the AA. Approximately 87 percent of ANBTX's deposits are located in the Dallas AA, while 8.7 percent are held in the Fort Worth AA, and 4.8 percent are held in the Van Zandt County AA. ANBTX operates in highly competitive markets. ANBTX faces the largest competition in the Dallas and Fort Worth AAs where it competes with local community banks, credit unions, mortgage companies, as well as larger regional and nationwide institutions. Major competitors in the Van Zandt AA include small and large community banks as well as several mortgage companies and nationwide institutions. The information provided in the Description of Institution detail section of this evaluation describes the institution's overall operations in comprehensive detail.

We reviewed community contact forms prepared by other regulatory agencies within the evaluation period of this exam and conducted one community contact with the president of an organization that promotes economic development within the Van Zandt AA. The community contact we had discussions with, noted that service, tourism, and hospitality sectors within the AA are growing and that this had spurred increases in the need for small business loans and affordable housing. She stated that banks support the community and are generally active with this organization in the chamber, as well as other organizations in the area.

Dallas AA

The following tables depict the demographic information for the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: American NB of Texas Dallas MSA AA (2016)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	464	10.3	19.6	26.7	42.9	0.4
Population by Geography	2,231,045	9.1	20.3	27.6	42.9	0.0
Housing Units by Geography	877,964	10.3	19.8	28.3	41.6	0.0
Owner-Occupied Units by Geography	490,983	3.8	15.4	28.0	52.8	0.0
Occupied Rental Units by Geography	303,014	18.4	25.0	29.4	27.2	0.0
Vacant Units by Geography	83,967	18.9	26.7	26.0	28.4	0.0
Businesses by Geography	215,786	5.1	15.3	24.9	54.3	0.3
Farms by Geography	4,004	3.6	15.5	30.4	50.4	0.1
Family Distribution by Income Level	533,900	20.6	15.4	18.2	45.9	0.0
Household Distribution by Income Level	793,997	21.7	15.8	17.3	45.2	0.0

Median Family Income MSA - 19124 Dallas-Plano-Irving, TX MD	\$67,175	Median Housing Value	\$192,567
		Median Gross Rent	\$907
		Families Below Poverty Level	9.2%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Table A – Demographic Information of the Assessment Area						
Assessment Area: American NB of Texas Dallas MSA AA (2017-18)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	464	11.0	21.8	24.6	41.8	0.9
Population by Geography	2,384,431	9.7	23.0	25.4	41.5	0.3
Housing Units by Geography	936,829	10.9	21.4	25.6	41.6	0.5
Owner-Occupied Units by Geography	505,853	3.7	17.6	26.4	52.0	0.2
Occupied Rental Units by Geography	358,471	19.0	26.1	24.8	29.2	0.9
Vacant Units by Geography	72,505	20.4	24.7	23.7	30.6	0.7
Businesses by Geography	238,872	6.0	16.2	24.2	53.1	0.5
Farms by Geography	4,271	4.8	16.4	28.5	50.0	0.3
Family Distribution by Income Level	583,950	21.8	15.4	17.1	45.6	0.0
Household Distribution by Income Level	864,324	22.6	15.8	17.0	44.7	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX MD	\$71,149	Median Housing Value				\$210,483
		Median Gross Rent				\$1,032
		Families Below Poverty Level				10.5%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Fort Worth AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Fort Worth MSA AA (2016)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	292	11.3	33.2	30.5	24.7	0.3
Population by Geography	1,409,164	9.3	32.4	32.5	25.8	0.0
Housing Units by Geography	547,286	8.8	32.6	34.3	24.3	0.0
Owner-Occupied Units by Geography	307,138	5.4	25.8	35.4	33.4	0.0
Occupied Rental Units by Geography	188,123	12.4	41.2	33.8	12.6	0.0
Vacant Units by Geography	52,025	15.5	42.0	29.7	12.8	0.0
Businesses by Geography	104,587	6.2	26.5	32.1	35.0	0.2
Farms by Geography	1,856	4.8	24.0	36.0	35.1	0.0
Family Distribution by Income Level	342,583	24.4	18.2	19.0	38.4	0.0
Household Distribution by Income Level	495,261	25.3	17.9	18.3	38.6	0.0
Median Family Income MSA - 23104 Fort Worth-Arlington, TX MD		\$64,976	Median Housing Value			\$140,539
			Median Gross Rent			\$833
			Families Below Poverty Level			11.8%
<i>Source: 2010 U.S. Census and 2016 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Fort Worth MSA AA (2017-18)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	292	16.4	27.7	31.2	24.3	0.3
Population by Geography	1,471,542	13.3	28.4	32.2	26.1	0.0
Housing Units by Geography	563,322	13.0	27.8	33.0	26.2	0.0
Owner-Occupied Units by Geography	308,285	7.4	22.6	35.1	34.9	0.0
Occupied Rental Units by Geography	208,203	19.1	34.3	31.2	15.5	0.0
Vacant Units by Geography	46,834	22.6	33.1	27.4	16.9	0.0
Businesses by Geography	114,313	8.6	24.6	29.5	37.1	0.2
Farms by Geography	1,968	6.4	21.1	33.4	39.1	0.0
Family Distribution by Income Level	355,127	26.0	17.2	18.8	38.0	0.0
Household Distribution by Income Level	516,488	26.6	17.1	18.1	38.1	0.0

Median Family Income MSA - 23104 Fort Worth-Arlington, TX MD	\$69,817	Median Housing Value	\$149,489
		Median Gross Rent	\$920
		Families Below Poverty Level	13.3%
<i>Source: 2015 ACS Census and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Scope of Evaluation in Texas

We completed full-scope reviews of the Dallas AA and the Fort Worth AA and a limited-scope review for the Van Zandt AA. We selected the Dallas AA and the Fort Worth AA for full-scope reviews because they represented the markets that the bank had the most predominant deposit concentrations, lending activity, and branch distribution. Refer to the table in Appendix A for additional information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on a full-scope review, the bank’s lending performance in the Dallas AA and the Fort Worth AA is good. The level of CD lending had a positive impact on the Lending Test.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. We identified small business loan products and home mortgage as the bank’s primary lending products and reviewed those two lending products for the purposes of the Lending Test.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Dallas AA	1,043	2,123	130	14	3,310	81.89	86.48
Fort Worth AA	54	442	0	5	501	12.39	8.70
Van Zandt AA	111	85	35	0	231	5.71	4.82
	1,208	2,650	165	19	4,042	100.00	100.00

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State* Loans	% State Deposits
Dallas AA	230,909	220,161	7,664	9,616	468,350	81.87	86.48
Fort Worth AA	13,389	49,583	0	17,897	80,869	14.13	8.70
Van Zandt AA	17,037	4,024	1,734	0	22,795	3.99	4.82
	261,335	273,768	9,398	27,513	572,014	100.00	100.00

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

Based on the data in Lending Volume Tables O, P, Q, and R, lending levels within the Dallas and Fort Worth AAs reflect good responsiveness to the AA's credit needs. The bank originated a good volume of loans in the AA relative to its capacity based on deposits, competition, market presence, and business strategy. The proportion of reported bank loans in each AA is comparable to the proportion of bank deposits in the respective AAs.

Dallas AA

Lending levels within the Dallas AA is good when factors such as competition and the bank's business strategy are considered. During the evaluation period, the bank originated 1,043 home mortgage loans totaling \$231 million, 2,123 small business loans totaling \$220 million, 130 loans to small farms totaling \$7.6 million and 14 CD loans totaling \$9.6 million. As of our evaluation date, 82 percent of the loans originated during the evaluation period were concentrated in the Dallas AA. Similarly, 86 percent of the bank's total deposits were in the Dallas AA. The deposit and lending concentrations within this AA reflects the principal location of the bank's commercial and retail customer base, branch location and the bank's lending focus.

Market share information for loans and deposits shows that ANBTX operates in a highly competitive banking environment. According to the FDIC Deposit Market Share Report, as of June 30, 2018, ANBTX ranked 13 among 136 depository institutions. Operating 22 branches in the AA, the bank had a deposit market share of 1.04 percent. Collectively, Bank of America, N.A., JPMorgan Chase Bank, N.A., and Texas Capital held the majority deposit market share of 62 percent.

According to the 2017–2018 Peer Mortgage Lending Data, ANBTX achieved a 0.41 percent market share of home mortgage loans and ranked 53rd among 728 reporting lenders. The bank's market share of home mortgage loans is significantly lower than its deposit market share of 1.04 percent. When the competitive nature of the home mortgage market within the Dallas AA is considered, along with the structure of the bank's loan portfolio, which is significantly concentrated in commercial and commercial real estate loans, the lending activity for home mortgages is considered adequate. The bank's market share for home mortgage loans in 2016 is relatively consistent with the 2017-2018 period. Market data for 2016 had ANBTX ranked 62nd with a market share of 0.37 percent amongst 888 reporting lenders. The largest lenders for home loans for the period were Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A., Bank of America, N.A., Quicken Loans and Everett Financial Inc. These five lenders had market shares collectively totaling 26.5 percent in home loans.

ANBTX with its loans to small businesses ranked 11th with a market share of 0.88 percent by number of loans and 3.5 percent by dollar volume of loans out of 215 lenders. This ranking places the bank in the top 9 percent among lenders with an average loan size of \$127,000. Given that the bank's market share for small loans to businesses, in dollar volume, exceeds its deposit market share of 1.04 percent, the bank's small loans to businesses lending activity is considered excellent. The top small business lenders in this AA by number of loans are American Express Bank, FSB (credit card bank), Chase Bank USA, NA, Bank of America N.A., Capital One, N.A. and Citibank, NA which together had a combined market share of 60 percent. The bank's market share for small loans to businesses in 2016 is relatively consistent with the 2017-2018 period. Market data for 2016 had ANBTX ranked 11th with a market share of 0.83 percent by number of loans and 3.30 percent by dollar amount out of 207 lenders.

Fort Worth AA

Lending activity is good in the Fort Worth AA, considering the bank's lending opportunities, its business strategy, and competitive factors within the AA. During the evaluation period, the bank originated or purchased 54 home mortgage loans totaling \$13.3 million, 442 small loans to businesses totaling \$49.5 million, and five CD loans in the AA totaling \$17.9 million. Deposit activity in this AA represents only 8.7 percent of the bank's total deposits as of June 30, 2018. Total reported loans for this AA represented 12.4 percent of the bank's total reported volume of loans during the evaluation period.

Market share information for loans and deposits in the AA for ANBTX reflect the highly competitive banking environment within the Fort Worth AA. Large financial institutions whose operations encompass large portions of the United States are active within this AA. Along with nationwide and regional banks, which possess an extensive branch network in the Fort Worth area, banks also compete with credit unions and several non-depository mortgage companies within this market. ANBTX operates four branch offices in the AA, one of which is located in a middle-income tract with the other three located in upper-income geographies. According to the FDIC Deposit Market Share Report, as of June 30, 2018, ANBTX ranked 27th among 80 depository institutions with a market share of 1.08 percent for its deposit base. JPMorgan Chase Bank, N.A., Wells Fargo Bank, N.A., Bank of America, N.A., Frost Bank and Compass Bank had the largest proportions of deposits with a collective 61 percent market share.

According to the Peer Mortgage Data for 2017–2018, ANBTX achieved a 0.04 percent of home mortgage loans and ranked 250 out of 783 institutions. The bank's home mortgage market share is significantly less than its deposit market share of 1.08 percent. Lending opportunities are limited given the competition for home mortgage loans within the AA and the bank's strategic focus in the Fort Worth market is small business loans. The five largest home lenders in this AA, Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A., Quicken Loans, Bank of America, N.A., and CitiMortgage Inc., had combined market shares totaling 27.4 percent in 2014. The bank's market share of home mortgage loans in 2016 is not inconsistent with 2017–2018, where it reflected a .05 percent market share and ranked 195 out of 733 institutions. The five largest home lenders for the period were Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A., Citibank, N.A., Bank of America, N.A., and CitiMortgage Inc. with a collective market share of 40 percent.

According to 2017–2018 Peer Small Business Data, ANBTX ranked 12th with a market share of 0.5 percent by number and 2.4 percent by dollar amount out of 168 lenders, placing the bank in the top 7 percent among those lenders. Given the bank's market share for small loans to businesses, by dollar amount, well exceeds its deposit market share of 1.08 percent, its lending activity is considered excellent. The dominant small business lenders in this AA by number were American Express Bank, FSB Credit Card Bank, Chase Bank USA, N.A., Bank of America N.A, Wells Fargo Bank, N.A., and Citibank (South Dakota) N.A. which together achieved a combined market share of 55 percent. The bank's market share for small loans to businesses in 2016 is not inconsistent with the bank's market share in 2017–2018. Peer Small Business Data for 2016 had ANBTX ranked 16th with a market share of 0.40 percent by number and 1.9 percent by dollar amount out of 172 lenders.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Dallas AA

Overall, the geographic distribution of home mortgage loans within the Dallas AA is good. In 2016, the bank's level of home mortgage lending was lower than the level of owner-occupied units but only somewhat lower than the aggregate lending within those geographies. Table O reflects that during this period, only 3.8 percent of housing units in the Dallas AA were owner-occupied, underscoring the limited opportunities for mortgage lending within this geography. The bank's mortgage lending in moderate-income geographies was higher than the level of owner-occupied units and well exceeded the level of aggregate lending within those geographies.

In 2017–2018, the bank's mortgage lending in low-income geographies was somewhat lower than the level of owner-occupied housing units and somewhat lower than the aggregate level of lending within those geographies. For moderate-income geographies, the bank's lending well exceeded both the proportion of owner-occupied units and aggregate lending levels within those geographies.

Fort Worth AA

Overall, the geographic distribution of home mortgage loans is adequate. The bank's share of the home mortgage market in the Fort Worth AA is significantly limited as only 54 loans were originated during the period. In 2016, the bank's reflected no lending penetration into low-income geographies. In moderate-income geographies, the bank's mortgage lending was comparable to the level of owner-occupied units and well-exceeded the level of aggregate lending within those geographies.

In 2017–2018, the bank's mortgage lending in low-income geographies was below the level of owner-occupied housing units within subject geographies. In moderate-income geographies, the bank lending was below the proportion of owner-occupied units and somewhat lower than the level of aggregate lending in those geographies.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses is excellent, based upon excellent distribution of lending in the Dallas MSA AA and a good distribution of lending in the Fort Worth MSA AA.

Dallas AA

In 2016, the bank's geographic distribution of small business lending was excellent. The bank's small business lending in low-income geographies was well above the percentage of business within low-income geographies and exceeded the level of aggregate lending. Similarly, in moderate-income geographies, the bank's lending well exceeded the percentage of small businesses located in moderate-income geographies and also exceeded the level of aggregate lending in moderate-income geographies.

For 2017–2018, the bank’s small business lending in low-income geographies exceeded the percentage of businesses located in low-income geographies and exceeded the aggregate lending to small businesses in low-income geographies. For moderate income geographies, the bank’s lending exceeded the percentage of small businesses located in moderate-income geographies and also exceeded the aggregate lending to small businesses in moderate-income geographies.

Fort Worth AA

For 2016, the bank’s geographic distribution of small business lending was good. The bank’s small business lending in low-income geographies was well above the percentage of businesses within low-income geographies and exceeded the level of aggregate lending within those geographies. In moderate-income geographies, the bank’s lending was comparable to both the percentage of small businesses and the level of aggregate lending in the correlating moderate-income geographies.

For 2017–2018, the bank’s small business lending in low-income geographies exceeded the percentage of businesses located in low-income geographies and exceeded the aggregate lending to small businesses in low-income geographies. For moderate income geographies, the bank’s small business lending was comparable to the percentage of small businesses located in moderate-income geographies and the level of aggregate lending to small businesses within those geographies.

Lending Gap Analysis

We evaluated the lending distribution of the bank’s AA to determine if any unexplained conspicuous gaps existed. There were no unexplained conspicuous gaps identified after reviewing performance context.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Dallas AA

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

The distribution of home mortgage loans reflects good distribution among low-and moderate-income individuals within the Dallas AA.

In 2016, the bank’s lending to low-income borrowers was lower than the percentage of families identified as low-income but exceeded the level of aggregate lending to low-income borrowers within the AA. For moderate-income individuals, the bank’s lending was somewhat lower than the percentage of families identified as moderate-income but well exceeded the aggregate level of lending to those individuals. In assessing the bank’s performance of reaching low- and moderate-income individuals, we considered the general affordability of housing within the MSA. In 2017 – 2018, the proportion of households living below the poverty level was approximately 11 percent. Additionally, the median housing value within the Dallas MSA was \$210,483, almost three times the median family income of \$71,149 for the same period.

Average rental costs at \$1,032 per month appeared to be a more affordable option to low- and moderate-income individuals whose earnings are most likely to be proportionate or less than the median family income.

For 2017–2018, the bank’s lending to low-income borrowers was lower than the percentage of families identified as low-income but well exceeded the aggregate lending to low-income borrowers. For moderate-income individuals, the bank’s lending was somewhat lower than the percent of families identified as moderate-income but was comparable to the aggregate lending levels to those individuals.

Fort Worth AA

The distribution of home mortgage loans reflects an adequate distribution among low-and moderate-income individuals within the Fort Worth AA when performance context issues, competitive factors, and the bank’s primary loan products in this AA are considered.

In 2016, the bank’s lending to low-income borrowers was lower than the percentage of families identified as low-income but exceeded the level of aggregate lending to low-income borrowers. For moderate-income individuals, the bank’s lending was lower than the percent of families identified as moderate-income but exceeded the level of aggregate lending to moderate-income individuals.

In 2017–2018, the bank’s lending to low-income borrowers was lower than the percent of families identified as low-income and somewhat lower than the aggregate lending to low-income borrowers. For moderate-income individuals, the bank’s lending was lower than both the percent of families identified as moderate-income and the level of aggregate lending to moderate-income individuals.

Small Loans to Businesses

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

Dallas AA

The borrower distribution of small loans to small businesses within the Dallas AA is good.

In 2016, the bank’s lending to businesses with revenues of \$1 million or less was lower than the percent of businesses identified as having revenues of \$1 million or less but exceeded the aggregate level of lending to these businesses.

In 2017–2018, the bank’s loans to businesses with revenues of \$1 million or less was lower than the percent of businesses identified as having revenues of \$1 million or less but was comparable to the aggregate level of lending to these businesses.

Fort Worth AA

The borrower distribution of small loans to small businesses within the Fort Worth AA is good.

For 2016, the bank’s lending to businesses with revenues of \$1 million or less was lower than the percent of businesses identified as having revenues of \$1 million or less but was comparable to the aggregate level of lending for these businesses.

For 2017–2018, the bank’s loans to businesses with revenues of \$1 million or less was lower than the percent of businesses identified as having revenues of \$1 million or less but was comparable to the aggregate level of lending for these businesses.

Community Development Lending

The institution has made a relatively high level of CD loans.

The Lending Activity tables, shown on page 9, set forth the information and data used to evaluate the institution’s level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

During the CD evaluation period, the bank originated 25 CD loans totaling \$44.9 million of which six were broader statewide loans with no purpose, mandate, or function to serve the bank’s designated AAs.

Dallas AA

ANBTX’s level of CD lending in the Dallas AA has a positive impact on the bank’s lending performance during the evaluation period. The bank originated 14 CD loans totaling \$9.6 million in this AA. The bank originated eight loans totaling \$1.6 million for affordable housing rehabilitation, and construction and permanent financing of multifamily rental properties serving LMI persons. In addition, ANBTX originated three loans totaling \$3.8 million that provided permanent financing for the revitalization and stabilization of LMI geographies. Finally, four loans totaling \$4.1 million were originated to fund the community services projects in low- or moderate-income geographies.

Fort Worth AA

ANBTX’s CD lending had a positive impact on the bank’s lending performance in the Fort Worth AA. The bank made or renewed five CD loans totaling \$17.9 million during the evaluation period. Two loans totaling \$16.8 million were made to revitalize and stabilize a moderate-income tract and middle-income tracts adjacent to low- and moderate-income geographies, through economic growth and development and job creation. Two loans totaling \$1.01 million were made to provide affordable housing rehabilitation, and construction and permanent financing of multifamily rental property serving LMI persons.

Van Zandt AA

CD lending had a neutral impact on the Lending Test for the Van Zandt AA. The bank made no CD loans during the evaluation period which is considered reasonable, considering the AA is primarily rural and opportunities for community development activities are limited.

Broader Statewide Area

In addition to the CD loans made within the bank’s AAs, ANBTX originated five qualifiable loans totaling \$11.8 million in the broader statewide with no purpose, mandate, or function to serve the AA. Three loans in the amount of \$5.6 million were made to revitalize and stabilize respective independent school districts located in low- and moderate areas. Two loans in the amount of \$6.2 million were made to rehabilitate and expand water storage facilities in a distressed and moderate-income geographies, respectively. The bank received positive consideration for these CD loans since it met the needs of its delineated AAs.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs. While there are no innovative lending products, ANBTX provides a variety of flexible lending products. Several flexible lending programs related to affordable housing are available. Additionally, the bank will use alternative sources to determine credit histories for consumer loan applicants. Here is a summary of the bank's flexible lending products:

FNMA HARP Refi Plus program: This program is available for refinancing existing Fannie Mae (and Freddie Mac) loans. The goal of the refinance effort is “to provide access to low-cost refinancing for responsible homeowners suffering from falling home prices”. The expectation is that refinancing their mortgage will put responsible borrowers in a better position by reducing their monthly principal and interest payments or moving them from a risky loan structure to a more stable product. Refi Plus simplifies the process of refinancing loans that are already in a lender's servicing portfolio. This product has no limits on maximum LTV and provides mortgage insurance flexibilities for LTVs over 80 percent. During this evaluation period, the bank closed three of these loans for a total of \$334.9 thousand.

FNMA Flex 97 Loan Program: According to consumer research conducted by Fannie Mae, the primary barrier to homeownership for first-time home buyers is saving money for the down payment and closing costs. To expand access to credit and to support sustainable homeownership, Fannie Mae offers 97 percent loan-to-value (LTV)/combined LTV (CLTV)/home equity CLTV (HCLTV) financing to help creditworthy home buyers who would otherwise qualify for a mortgage but may not have the resources for a larger down payment, and a refinance option for Fannie Mae loans. During this evaluation period, ANBTX closed eight loans under this program in its assessment areas for a total of \$1,428,713.

FNMA Modifications: ANBTX Special Assets department has worked to help at risk homeowners – both those whose mortgage payment is in default and those whose mortgage payment is in imminent default. If borrowers qualify for FNMA modification options such as Modified VR, Streamline, HAMP, Deed in Lieu, Short Sale, etc., they can receive relief through affordable and sustainable monthly payments. During this evaluation period, ANBTX received approval on four loans for a total of \$529,415.16.

Municipalities Business Unit: ANBTX provides a full range of services to Municipal clients. In addition to deposit and treasury management services, ANBTX also provides funding to its customers via private placements, many times at lower than market interest rates. Many of the municipalities provide community development benefits to low and moderate income, distressed and underserved, and economically disadvantaged areas and individuals. In ANBTX AAs for this evaluation period, there were 10 loans for a total of \$17,344,575.

SBA Department: ANBTX continues to reach more small businesses through its SBA department. During this evaluation period, the department has approved 93 loans in 7a, and 504 programs in ANBTX AAs for a total of \$64,832,226.

Small Business Your kPlan: The ANBTX Your kPlan is an innovative product offering from the ANBTX trust department. This product is a 401(k) and profit-sharing retirement plan that all business owners can adopt for themselves and their employees, instead of forming their own plan with the full fiduciary responsibility. This multiple employer group trust provides big corporation benefits at small business prices, also allowing small business owners to choose a successful retirement plan for themselves and their employees, without the added cost and difficulty of forming an independent plan. During this evaluation period, over 40 small business owners and over 500 of their employees, many which are low- and moderate-income workers, have participated in this retirement plan product.

Conclusions for the Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Van Zandt AA is consistent with the bank's overall performance under the Lending Test in the full-scope areas. The level of small business loans originated to small business during the evaluation period was lower than the proportion of small businesses within the AA, but proportionate to the aggregate level of lending to those businesses. The bank's distribution of home mortgage loans to low- and moderate-income individuals is adequate. The bank had no penetration of home mortgage loans to low-income borrowers, however, its lending distribution to moderate-income borrowers exceeded the aggregate level of lending to those borrowers. The Van Zandt AA has no low- or moderate-income census tracts so a geographical distribution assessment would not have been meaningful. The bank's level of CD lending in the Van Zandt AA is very poor. However, when considering the limited opportunities for community development in the AA, responsiveness improves to poor. The lack of CD lending did not have a significant impact on the bank's overall performance under the Lending Test.

Refer to Tables O through R in the state of Texas section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

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

Based on a full-scope review, the bank's performance in the Fort Worth MSA is excellent.

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

The institution exhibits good responsiveness to credit and community economic development needs.

The institution rarely uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Dallas MSA	12	11,417	128	2,838	140	69	14,254	35	0	0
Fort Worth MSA	5	6,037	32	2,856	37	18	8,893	22	0	0
Van Zandt AA	0	0	16	36	16	8	36	0	0	0
Statewide with no Purpose, Mandate, or Function	3	5,486	7	11,887	10	5	17,373	43	0	0

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

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

Dallas AA

ANBTX's level of investments and donations in the Dallas MSA is significant when considering community development needs and opportunities in the MSA. Donations and investments totaled \$14.25 million during the evaluation period. This represents 6 percent of allocated tier one capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the Dallas MSA.

During the evaluation period, management purchased one municipal bond totaling \$2.57 million that benefited the Dallas MSA. The bond helped improve school facilities in an economically disadvantaged school district in Hunt County. In addition, management received credit for seven investments totaling \$9.23 million that were purchased in prior periods and still outstanding. These investments support the revitalization/stabilization of low- or moderate-income census tracts and provide community services to low- or moderate-income individuals.

During the evaluation period, management continued its investment in five mutual funds totaling \$2.19 million that benefited the Dallas MSA. These funds are invested in small business investment companies (SBICs) that promote economic development by financing small businesses located in the Dallas MSA.

Management provided 127 donations totaling \$273 thousand to various community development organizations. A majority of the donations, 100 totaling \$192 thousand, support community service agencies. Twenty-five of the donations, totaling \$77 thousand, support economic development. Two of the donations, totaling \$4 thousand, support projects that revitalize/stabilize low- or moderate-income census tracts.

Fort Worth AA

ANBTX's level of investments and donations in the Fort Worth MSA is excellent when considering the community development needs and opportunities in the MSA. Donations and investments totaled \$8.89 million during the evaluation period. This represents 39 percent of allocated tier one capital as of December 31, 2018. Capital was allocated based on the bank's portion of deposits in the Fort Worth MSA.

During the evaluation period, management purchased one municipal bond totaling \$2.8 million that benefited the Fort Worth MSA. The bond helped improve school facilities in an economically disadvantaged school district in Parker County. In addition, management received credit for five investments totaling \$6.04 million that were purchased in prior periods and are still outstanding. These investments support the revitalization/stabilization of low- or moderate-income census tracts and provide community services to low- or moderate-income individuals.

Management provided 31 donations totaling \$56 thousand to various community development organizations. A majority of the donations, 26 totaling \$36 thousand, support community service agencies. Five of the donations, totaling \$20 thousand, support economic development.

Statewide with no Purpose, Mandate, or Function

Qualified investments that are located in the broader statewide or regional area that do not have a purpose, mandate, or function to serve the bank's AAs may receive consideration if the bank has been responsive to the needs and opportunities of its AAs. Because the level of qualified investments in the AAs is significant, the investments with broader statewide impact receive consideration. Management purchased school bonds from distressed and underserved districts in the state of Texas during the evaluation period. Management also purchased municipal bonds to fund improvements to critical infrastructure, including water and sewer projects, in distressed and underserved geographies in Texas during the evaluation period. Additionally, management made a donation to assist with disaster recovery related to Hurricane Harvey. Management also received consideration for bonds that were purchased in prior periods and still outstanding. These bonds helped fund improvements to school facilities and critical infrastructure in distressed and underserved areas.

Conclusions for Area Receiving Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Van Zandt AA is weaker than the bank's overall performance under the Investment Test in the full-scope areas.

ANBTX's level of investments and donations in the Van Zandt AA is very poor. However, when considering the limited opportunities for community development in the AA, responsiveness improves to poor. This does not have a significant impact on the bank's overall performance under the Investment Test given less than 5 percent of deposits are in this AA.

SERVICE TEST

ANBTX's performance under the Service Test in Texas is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, ANBTX's performance in the Dallas and Fort Worth AAs was good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Dallas AA	86.5	22	78.6	1	7	10	4	9.7	23.0	25.4	41.5
Fort Worth AA	8.7	4	14.3	0	0	1	3	13.3	28.4	32.2	26.1
Van Zandt AA	4.8	2	7.1	N/A	0	1	1	N/A	6.6	71.8	21.5

Dallas AA

ANBTX's service delivery systems are accessible to geographies and individuals of different income levels throughout the Dallas AA. Eight of ANBTX's 22 branches, including the bank's main office, are located in LMI CTs in the AA. This represents 36.4 percent of branch locations in the Dallas AA. Eight of ANBTX's 24 ATMs are located in LMI CTs in the AA. This represents 33.3 percent of ATM locations in the Dallas AA. This distribution compares favorably to the 32.7 percent of the AA population living in LMI geographies per 2015 ACS data.

Fort Worth AA

ANBTX's service delivery systems are accessible to geographies and individuals of different income levels throughout the Fort Worth AA. ANBTX operates four branches and five ATMs in the Fort Worth AA. One branch and one ATM are located in a middle-income CT with the remaining branches and ATMs located in upper-income CTs. While this does not appear to compare favorably to the 41.7 percent of the AA population living in LMI geographies per 2015 ACS data, ANBTX has strategically placed their branches and ATMs conveniently along major highways that are heavily relied upon daily for business and personal travel. The three branches (and their ATMs) located in upper-income CTs are situated due south, northeast, and southeast of downtown Fort Worth, which is in the center of Tarrant County, and are each located on or very near to I-35W, TX-121/TX-183, TX-26, US-287, and TX-360. The branch and ATM located in the middle-income CT is situated just west of Fort Worth's central business district, which is very close to many of the LMI CTs in the AA. It is also important to note that, due to significant competition, ANBTX has a very small market share in the Fort Worth AA. ANBTX ranks 27th out of 28 institutions located in the AA based on number of branches and amount of deposits and has just 0.54 percent of the deposit market share. Only 8.7 percent of ANBTX's total deposits are located in this AA.

Alternative Delivery Systems

In addition to full-service branches, ANBTX provides a number of alternative delivery systems, which are accessible to geographies and individuals of different income levels throughout their three AAs. ANBTX offers ATMs that are all deposit-accepting and are able to process transactions in English and Spanish; 24-hour telephone banking, including funds transfers, stop payments, and debit card services; online banking, including such features as viewing account balances, intra- and inter-bank transfers, loan and deposit applications, bill pay, and e-statements; mobile banking, including mobile deposit; Visa debit cards with chip technology; direct deposit; and banking by mail for customers that prefer to use the mail service.

During the evaluation period, 5,620 alternative transactions (mobile deposit, online bill pay, telephone transfer) were completed by LMI individuals across ANBTX's three AAs. This accounted for 22 percent of all such transactions by all customers.

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
Dallas AA	2	0	0	0	+2	0
Fort Worth AA	0	0	0	0	0	0
Van Zandt AA	0	0	0	0	0	0

To the extent changes have been made, the bank's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and to LMI individuals.

Dallas AA

ANBTX opened two locations in the Dallas AA over the evaluation period. No branches were closed during the evaluation period.

In November 2017, ANBTX opened a loan production office (LPO) in their Dallas AA located in Frisco, Collin County, Texas. The LPO is located in a middle-income CT, but is adjacent to the only moderate-income CT in the vicinity.

As this moderate-income CT was previously situated the furthest from any ANBTX branches in Collin County, opening this LPO directly benefits the individuals living in the CT, making lending services more accessible to them. In September 2018, ANBTX purchased First State Bank and acquired their full-service banking center located in Mesquite, Dallas County, Texas. Similar to their Frisco LPO, this branch is located in a middle-income CT, but is adjacent to moderate-income CTs on all sides and is situated near a large cluster of LMI geographies to the northeast. Therefore, by adding this location to their branching network, ANBTX provides individuals in these LMI geographies better accessibility to banking services since accessing one of ANBTX's other branches previously required additional travel.

Fort Worth AA

ANBTX did not open or close any branches in the Fort Worth AA during the evaluation period.

Services and business hours do not vary in a way that inconveniences its AAs, particularly LMI geographies and/or individuals.

Hours of operation and services offered across geographies of different income levels in the Dallas and Fort Worth AAs do not vary in a way that inconveniences the AAs. Lobby and drive-thru hours are similar among all full-service branches. Extended drive-thru hours are offered on Fridays until 6:00 p.m. and on Saturdays from 9:00 a.m. until 12 p.m. The downtown Fort Worth branch no longer offers Saturday drive-thru hours given particularly low customer traffic indicating that availability is not in high demand in this area. ANBTX offers free and low-cost checking and savings accounts at all branches. Lenders are available at each branch with a few exceptions where a mortgage lender floats between several branches, in which case an appointment can be made upon request. Business customers are offered night depository services, remote deposit capture, deposit-taking ATMs, and various other cash management services to accommodate their business needs.

Community Development Services

ANBTX provides a relatively high level of CD services.

Dallas AA

ANBTX provides a relatively high level of CD services in the Dallas AA. Forty bank officers and employees devoted 8,230 CD service hours to 77 different qualifying organizations benefiting the Dallas AA during the evaluation period. These hours, which represent 83.1 percent of the total CD service hours recorded during the evaluation period, are consistent with the percentage of ANBTX's deposits that are in the Dallas AA. Approximately 80 percent of these hours were spent in leadership positions with various organizations throughout the AA. They shared their financial and business expertise by serving as Board members, officers, on committees, as well as assisting with fundraising efforts. These activities helped to provide affordable housing, economic development, revitalization and stabilization of LMI geographies, and community services to LMI individuals and families.

The following are examples of community development services provided to the Dallas AA during the evaluation period:

- Four executive officers and employees, including the Chief Executive Officer (CEO), General Counsel, a Commercial Lender, and an Executive Assistant, contributed a combined 568 community service hours to the Terrell Independent School District (ISD) Excellence Foundation, which spanned all three calendar years of the evaluation period. Together they donated their financial and business expertise to strategic planning and budgeting for special program funds for the ISD, of which 76 percent of the students are economically disadvantaged.
- A Regional Market President donated 42 hours to the North East Texas Community Development Corporation, which spanned two of the calendar years of the evaluation period. As vice president of the Board, he donated his financial and business expertise to strategic planning and budgeting for this affordable housing provider to LMI seniors and disabled individuals.
- The Chief Financial Officer provided 609 hours of his time during the evaluation period to promote the economic development and revitalization/stabilization of LMI geographies in the Dallas AA. During the evaluation period, he served on the Board of two different organizations whose purposes are to develop the local economy through attracting local businesses to create and retain jobs, as well as strategic planning and budgeting for road grants.

- Two employees, including the CEO and a Retail District Manager, contributed a combined 504 community service hours to the A. Fern Norville Children’s Shelter, which spanned all three calendar years of the evaluation period. Together they donated their financial and business expertise to strategic planning and budgeting for this shelter that serves LMI children and young adults.

Fort Worth AA

ANBTX provides a relatively high level of CD services in the Fort Worth AA. Twelve bank officers and employees devoted 1,132 CD service hours to 19 different qualifying organizations benefiting the Fort Worth AA during the evaluation period. These hours, which represent 11.4 percent of the total CD service hours recorded during the evaluation period, are consistent with the percentage of ANBTX’s deposits that are in the Fort Worth AA. Approximately 84 percent of these hours were spent in leadership positions with various organizations throughout the AA. They shared their financial and business expertise by serving as Board members, officers, on committees, as well as assisting with fundraising efforts. These activities helped to provide economic development, revitalization and stabilization of LMI geographies, and community services to LMI individuals and families.

The following are examples of community development services provided to the Fort Worth AA during the evaluation period:

- A Mortgage Lender contributed 87 community service hours to the Grand Prairie ISD Education Foundation, which spanned all three calendar years of the evaluation period. Through his role on the Board, he donated his financial and business expertise to strategic planning and budgeting for special program funds for the ISD, of which 72 percent of the students are economically disadvantaged.
- Three employees, including a Banking Center Manager, a Banking Center Assistant Manager, and the CRA Officer, contributed a combined 29 community service hours to the Financial Awareness Coalition of Tarrant County, which spanned two of the calendar years of the evaluation period. In their roles as instructors and committee members, they provided their financial expertise to LMI children, students, and adults through financial education.
- A Banking Center President contributed 80 community service hours to the non-profit organization Helping Restore Ability, which spanned all three calendar years of the evaluation period. Through his role on the Board, he provided his financial and business expertise to strategic planning and budgeting to this organization that enriches the lives of LMI individuals with disabilities.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, ANBTX’s performance under the Service Test in the Van Zandt AA is consistent with the bank’s overall performance under the Service Test in the full-scope areas.

Appendix A: Scope of Examination

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

Time Period Reviewed:	08/01/2016 to 12/31/2018	
Bank Products Reviewed:	Home Mortgage Loans Small Business Loans Community Development Loans Qualified Investments Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Texas		
Dallas AA	Full-scope	Counties of Collin, Hunt, Kaufman, Rockwall. Partial County of Dallas. This AA consists of 464 whole census tracts. These counties make up the vast majority of the Dallas MSA, excluding the western part of Dallas County.
Fort Worth AA	Full-scope	Partial counties of Tarrant and Johnson. This AA consists of 292 whole census tracts. These counties make up the Fort Worth MSA. Excluded from the AA are the northwest, southwest, and far west portions of Tarrant County as well as the vast majority of Johnson County. The AA includes just four whole census tracts in Johnson County.
Van Zandt AA	Limited-scope	County of Van Zandt. This AA consists of 10 whole census tracts. This county is not part of an MSA.

Appendix B: Summary of MMSA and State Ratings

RATINGS: The American National Bank of Texas				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
The American National Bank of Texas	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State:				
Texas	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under §1003.2 of this title, and that is not an excluded transaction under §1003.3(c)(1) through (10) and (13) of this title.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated the same as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th of each year. Tables without data are not included in this PE.

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Dallas AA	378	86,499	84.0	97,677	3.8	1.6	2.2	15.4	16.7	8.7	28.0	40.5	26.0	52.8	41.3	63.1	0.0	0.0	0.0	
Ft. Worth AA	20	4,374	4.4	44,349	5.4	0.0	1.6	25.8	25.0	15.7	35.4	35.0	38.6	33.4	40.0	44.1	0.0	0.0	0.0	
Van Zandt AA	52	8,406	11.6	1,086	0.0	0.0	0.0	0.0	0.0	0.0	89.1	82.7	87.4	10.9	17.3	12.6	0.0	0.0	0.0	
Total	450	99,279	100.0	143,112	4.3	1.3	2.0	19.1	15.1	10.8	31.9	45.1	30.4	44.7	38.4	56.8	0.0	0.0	0.0	

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Dallas AA	665	144,410	87.7	90,819	3.7	1.1	2.9	17.6	27.8	11.9	26.4	47.4	27.9	52.0	23.8	57.1	0.2	0.0	0.2	
Ft. Worth AA	34	9,015	4.5	41,634	7.4	2.9	3.1	22.6	14.7	17.6	35.1	38.2	37.8	34.9	44.1	41.4	0.0	0.0	0.0	
Van Zandt AA	59	8,631	7.8	1,095	0.0	0.0	0.0	4.7	0.0	4.6	72.5	71.1	73.2	22.8	28.8	22.3	0.0	0.0	0.0	
Total	758	162,056	100.0	133,548	5.0	1.6	2.9	19.2	25.6	13.6	30.5	49.5	31.4	45.1	23.3	51.9	0.1	0.0	0.2	

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2016
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Dallas AA	378	86,499	84.0	97,677	20.6	3.2	2.8	15.4	12.4	9.8	18.2	18.0	16.5	45.9	61.9	54.2	0.0	4.5	16.7
Ft. Worth AA	20	4,374	4.4	44,349	24.4	5.0	4.3	18.2	15.0	13.9	19.0	5.0	17.9	38.4	50.0	41.6	0.0	25.0	22.3
Van Zandt AA	52	8,406	11.6	1,086	16.6	0.0	1.9	17.4	5.8	9.0	22.8	17.3	19.1	43.2	73.1	49.0	0.0	3.8	21.0
Total	450	99,279	100.0	143,112	22.0	2.9	3.2	16.5	11.8	11.1	18.6	17.3	16.9	42.9	62.7	50.3	0.0	5.3	18.5

Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2017-18
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Dallas AA	665	144,410	87.7	90,819	21.8	6.2	2.9	15.4	10.8	10.8	17.1	23.5	18.4	45.6	56.5	53.1	0.0	3.1	14.7
Ft. Worth AA	34	9,015	4.5	41,634	26.0	3.7	4.8	17.2	7.4	14.8	18.8	22.2	19.9	38.0	51.9	41.5	0.0	14.8	19.0
Van Zandt AA	59	8,631	7.8	1,095	19.7	0.0	2.8	17.2	10.0	8.7	19.3	13.3	22.4	43.7	76.7	47.5	0.0	0.0	18.6
Total	758	162,056	100.0	133,548	23.3	5.4	3.5	16.1	10.4	12.0	17.8	22.4	18.9	42.8	58.0	49.5	0.0	3.8	16.1

Source: 2015 ACS Census; 01/01/2017 - 12/31/2018 Bank Data, 2017 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2016
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Dallas AA	727	106,798	81.1	71,346	5.1	7.7	5.2	15.3	24.8	15.3	24.9	34.1	23.4	54.3	33.3	55.9	0.3	0.1	0.2
Ft. Worth AA	144	21,124	16.1	33,404	6.2	9.7	6.7	26.5	15.3	26.1	32.1	46.5	31.6	35.0	28.5	35.5	0.2	0.0	0.1
Van Zandt AA	25	1,623	2.8	961	0.0	0.0	0.0	0.0	0.0	0.0	94.1	80.0	93.7	5.9	20.0	6.3	0.0	0.0	0.0
Total	896	129,545	100.0	105,711	5.4	7.8	5.6	18.8	22.5	18.6	27.8	37.4	26.6	47.6	32.1	49.0	0.3	0.1	0.2

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0.

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2017-18
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Dallas AA	1,396	218,786	79.6	67,254	6.0	7.8	7.0	16.2	29.0	16.9	24.2	33.3	23.4	53.1	29.9	52.3	0.5	0.0	0.5
Ft. Worth AA	298	54,902	17.0	30,556	8.6	11.1	9.5	24.6	25.2	25.8	29.5	37.6	28.9	37.1	26.2	35.7	0.2	0.0	0.1
Van Zandt AA	60	4,512	3.4	1,058	0.0	0.0	0.0	7.1	0.0	3.2	61.1	61.7	67.3	31.8	38.3	29.5	0.0	0.0	0.0
Total	1,754	278,200	100.0	98,868	6.8	8.1	7.7	18.9	27.4	19.5	26.2	35.0	25.6	47.8	29.5	46.9	0.4	0.0	0.4

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2016
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Dallas AA	727	106,798	81.1	71,346	85.4	47.2	43.1	5.5	49.0	9.0	3.9
Ft. Worth AA	144	21,124	16.1	33,404	84.3	40.3	42.1	5.2	56.9	10.6	2.8
Van Zandt AA	25	1,623	2.8	961	87.0	68.0	47.7	3.9	24.0	9.1	8.0
Total	896	129,545	100.0	105,711	85.1	46.7	42.8	5.4	49.6	9.5	3.8

Source: 2016 D&B Data; 01/01/2016 - 12/31/2016 Bank Data; 2016 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2017-18
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Dallas AA	1,396	218,786	79.6	67,254	85.9	45.9	48.0	5.3	51.7	8.8	2.4
Ft. Worth AA	298	54,902	17.0	30,556	84.7	41.3	45.1	4.9	57.4	10.4	1.3
Van Zandt AA	60	4,512	3.4	1,058	85.7	53.3	55.5	4.4	35.0	9.9	11.7
Total	1,754	278,200	100.0	98,868	85.5	45.4	47.2	5.2	52.1	9.3	2.5

Source: 2018 D&B Data; 01/01/2017 - 12/31/2018 Bank Data; 2017 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0.