



PUBLIC DISCLOSURE

February 24, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Trinity Bank N.A
Charter Number: 24397

3500 W Vickery Boulevard
Fort Worth, TX 76107

Office of the Comptroller of the Currency

Fort Worth Field Office
9003 Airport Freeway Suite 275
North Richland Hills, TX 76180-9127

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.

Table of Contents

Overall CRA Rating.....	2
Description of Institution.....	3
Scope of the Evaluation.....	4
Discriminatory or Other Illegal Credit Practices Review.....	5
State Rating.....	6
State of Texas.....	6
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of MMSA and State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on Trinity Bank's (Trinity) lending performance in its one Assessment Area (AA), specifically the following factors: the bank's lending penetration to borrowers with different incomes and in different geographies, the proportion of lending within the bank's AA and the bank's lending-to-deposit ratio (LTD).
- The bank's LTD ratio is reasonable at 63.61 percent when considering the bank's size, financial condition and performance context.
- A majority of the bank's loans were originated within its AA during the evaluation period.
- The bank's distribution of business and home mortgage loans by income level of geography reflects reasonable penetration.
- When performance context factors are considered, the bank's distribution of loans to borrowers of different incomes is reasonable.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the assessment area (AA), Trinity's LTD ratio is reasonable.

From January 1, 2017 to December 31, 2019, the bank's LTD ratio averaged 63.30 percent, ranging from a low of 54.55 percent to 71.70 percent. We compared the bank's average LTD ratio to those of similarly-situated financial institutions in terms of asset size within the AA. The average LTD ratio of the similarly-situated institutions during the same period was 75.17 percent, ranging from a low of 46.44 percent to a high of 91.09 percent. The quarterly average LTD ratio for each of the similarly situated institutions within bank in the AA is listed below.

Loan-to-Deposit Ratios		
Institution	Total Assets	Average LTD
<i>Trinity Bank, National Association</i>	<i>309,062</i>	<i>63.30</i>
Providence Bank of Texas, SSB	151, 923	68.91
Worthington National Bank	295,417	83.78
The National Bank of Texas at Fort Worth	295,558	69.70
Bank of the West	505,590	77.09

Source: Institution Reports of Condition from January 1, 2017 to December 31, 2019

Lending in Assessment Area

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

During the evaluation period, the bank originated 73.63 percent of its total loans inside the bank's AA. This analysis is performed at the bank, rather than at the AA, level.

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	34	77.27	10	22.73	44	12,244	78.20	3,412	21.80	15,657
Small Business	56	70.00	24	30.00	80	40,457	68.68	18,453	31.32	58,911
Total	90	73.63	34	26.37	124	52,702	73.44	21,866	26.56	74,568

Source: Evaluation Period: 1/1/2017 - 12/31/2019 Bank Data. Entire population of the bank's small business and home mortgage loans used for this analysis. Due to rounding, totals may not equal 100.0

Description of Institution

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

The bank designates the entire Tarrant County as its AA. The bank's market reach is concentrated in the city of Fort Worth, TX, which is the largest city within Tarrant County. Tarrant County is part of the Fort Worth-Arlington-Grapevine Metropolitan Statistical Area (MSA).

The bank offers a traditional mix of lending and deposit products. Lending products include commercial and industrial loans, commercial real estate loans, single-family residential mortgages, and a few consumer and auto loans. As of December 31, 2019, the bank reported total assets of \$309 million, total loans of \$165 million and total investments valued at \$123 million. The bank reported total deposits of \$271 million and total capital of \$38 million. The bank's loan portfolio breakdown reflects commercial and industrial loans as the bank's primary loan product at 59 percent of the portfolio. Secondary loan products comprise of commercial real estate loans at 27 percent and 1-4 residential real estate loans at 10 percent of the loan portfolio respectively. Consumer loans and small farm loans constitute a minimal portion of the loan portfolio.

Trinity's business strategic focus is to continue to strengthen the relationship-based banking services it already provides to small and medium sized businesses within Tarrant County while attracting new lending opportunities. The bank tries to meet the day-to-day financing needs of these businesses and also accommodates the occasional consumer type or home mortgage loan requests from the owners and employees of its commercial loan clientele. These businesses comprise a significant portion of the

bank's deposit base. The bank's location is not particularly visible from major thoroughfares therefore, there is very little foot traffic in the bank. The majority of the bank's customer base has been cultivated and maintained for years through the personal outreach efforts of the management team and the senior lending staff.

Competition for qualitative commercial and industrial lending opportunities to small and medium businesses within the Tarrant County AA is strong. This occurs as several local, regional, and national banks, as well as credit unions, mortgage companies, and non-bank lenders continue to find Tarrant County and the greater Fort Worth area as a conducive environment where businesses thrive regardless of their size.

No legal impediments or other factors hinder the bank's ability to provide credit in its AA. The bank is financially capable of meeting credit needs within its community, subject to certain legal restrictions applicable to all national banks.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period for the lending products assessed was between January 1, 2017 and December 31, 2019. We assessed Trinity's CRA performance within its AA using Interagency Small Bank Procedures. The bank is subject to the Lending Test. We completed the Lending Test by reviewing a combined sample of commercial & industrial loans and commercial real estate loans as well as a separate sample of 1-4 family residential mortgage loans, which represent the bank's primary and secondary lending products, respectively. The volume of home mortgage loans made during the evaluation period did not meet the threshold for reporting in accordance with the requirements of the Home Mortgage Disclosure Act (HMDA); therefore, we manually sampled all such loans.

We completed our evaluation of the bank's lending penetrations into different geographies and borrowers of different incomes using demographic data reported from the American Community Survey (ACS) conducted in 2015.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a 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) 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.

The bank has one designated AA which will receive a full-scope review.

Ratings

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

The Bank's strategy is focused on serving small and medium-sized business within its AA. Therefore, we placed a greater weight on the bank's performance in small business lending.

The state rating is based on performance in the AA.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Texas

CRA rating for the State of Texas: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's LTD ratio is reasonable, reflecting satisfactory responsiveness to credit needs within the AA.
- A majority of loans were originated inside the Bank's AA.
- The bank exhibits a reasonable geographic distribution of loans within its AA.
- The bank reflects a reasonable distribution of loans to borrowers of different income levels and businesses of different sizes when the bank's performance factors are considered.
- Trinity has not received any complaints regarding its CRA performance during the evaluation period.

Description of Institution's Operations in Texas

Trinity operates only within the state of Texas. The institution's operations are discussed in detail under the Description of Institution section.

According to the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report dated June 30, 2019, Trinity held deposits of \$219.9 million, which represented 0.42 percent of the AA deposit market share among depository institutions in the rating area.

Competitors include other local community banks located within its markets and large banks that have a nationwide footprint. The largest depository institutions were JP Morgan Chase Bank, NA, American Airlines, Wells Fargo Bank, NA, and Bank of America, NA which held a combined 51 percent market share.

Two community contacts in Tarrant County who were recently interviewed noted continuous growth within the area as part of overall growth within the state of Texas. Accompanying that growth are rapidly increasing housing costs resulting in the need for more affordable housing opportunities. Additionally, a sizeable portion of the low- and moderate-income population within the AA remains unbanked, making them susceptible to predatory lending products. The contacts noted that financial institutions within the AA generally support affordable housing initiatives and outreach to part of the population needing financial education, but more could be done to meet the increasing needs. The community contact stated that banks support the community and are generally active with this organization in the chamber, as well as other organizations in the area.

Scope of Evaluation in Texas

Trinity has designated Tarrant County as its AA. Tarrant County is part of the Fort Worth-Arlington-Grapevine MSA. Fort Worth is the largest city and the county seat of Tarrant County. The AA consists of one whole county and does not arbitrarily exclude any low- or moderate-income geographies. Tarrant County comprises of 357 census tracts of which 104 census tracts are designated as upper-income, 113 as middle-income, 92 as moderate-income, and 47 as low-income. Based on the 201 ACS data, the AA has a total population of 1,914,526. There are 732,985 housing units in the AA, of which 56 percent are owner-occupied, 36 percent are renter-occupied and 8 percent are vacant. Approximately, 23 percent of the families in the AA are considered low-income. Moderate-income families represent approximately 16 percent of the population, while middle- and upper-income families account for the remaining 61 percent of the population.

Tarrant County's economy is robust and continues to grow in population and business activity. The predominant economic activity in the AA is driven by retail-related businesses. The largest employers include American Airlines, Lockheed Martin, and the local school districts and hospitals. Competition is strong in the AA. There are 53 other commercial banks and 9 savings institutions in the AA; many of them are branches of larger institutions. The AA also includes other competitors in the form of credit unions, investment firms, and finance companies.

Tarrant County AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Trinity Bank AA Tarrant Cn						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	357	13.2	25.8	31.7	29.1	0.3
Population by Geography	1,914,526	10.1	24.4	32.5	33.0	0.0
Housing Units by Geography	732,985	10.0	24.5	33.0	32.5	0.0
Owner-Occupied Units by Geography	410,486	5.2	18.8	34.4	41.5	0.0
Occupied Rental Units by Geography	263,251	15.6	31.9	32.1	20.4	0.0
Vacant Units by Geography	59,248	18.3	31.0	27.4	23.2	0.0
Businesses by Geography	171,712	6.4	20.8	27.4	45.2	0.1
Farms by Geography	3,051	4.8	18.6	30.4	46.2	0.0
Family Distribution by Income Level	466,070	23.1	16.3	19.3	41.3	0.0
Household Distribution by Income Level	673,737	24.0	16.3	18.3	41.4	0.0
Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX		\$69,339	Median Housing Value			\$155,983
			Median Gross Rent			\$946
			Families Below Poverty Level			11.6%

Source: 2015 ACS Census and 2019 D&B Data
Due to rounding, totals may not equal 100.0
(* The NA category consists of geographies that have not been assigned an income classification.

LENDING TEST

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

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

When evaluating the bank's performance under the Lending Test, we placed more weight on the bank's performance related to small business loans due to it being the bank's primary loan product. Lesser weight was given to the bank's performance related to home mortgage loans because they do not comprise a significant portion of the bank's loan portfolio.

Distribution of Loans by Income Level of the Geography

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

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.

Overall, the geographic distribution of home mortgage loans is reasonable. During the evaluation period, the bank's mortgage lending in low-income census tracts (CTs) well-exceeded the level of owner-occupied units located in low-income CTS within the AA and the level of aggregate lending originated within those CTs. In moderate-income CTs, the bank's mortgage lending was below the level of owner-occupied units within these CTs and somewhat below the level of aggregate lending originated by peer banks in these CTs.

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 reasonable. During the evaluation period the bank's business lending activity in low-income geographies was slightly above the percentage of business within low-income geographies and was comparable to the aggregate level of lending originated by similarly situated financial institutions. In moderate-income geographies, the bank's lending penetration was somewhat below the level of businesses in those geographies and somewhat lower than the aggregate level of lending completed by similarly-situated institutions.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes when the bank's performance context, strategic focus and primary products are considered.

Home Mortgage Loans

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

The bank's distribution of home mortgage loans is poor. During the evaluation period, the bank reported no lending penetration of home mortgage loans to low- and moderate-income borrowers. However, these distributions are reasonably explained by the bank's performance context, primary loan product and nature of its customer base. The bank originated only 34 home mortgage loans during the three-year evaluation period. Twenty, or 60 percent, of those loans were non-owner occupied and originated to legal entities who purchased these homes for investment purposes. Of these loans made, 7 or 20 percent funded rental properties located in low- and moderate-income geographies for low dollar amounts which ranged from \$44 thousand to \$200,000. Although the bank does not track its community development activities, these loans could possibly be viewed as providing some opportunities for affordable housing in the low- and moderate-income geographies within the bank's AA. The remainder of the home mortgage loans made were originated as an accommodation to bank's customers, all of whom have existing commercial and industrial loan relationships with the bank.

Small Loans to Businesses

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

The bank's lending distribution to businesses of different sizes is reasonable when the bank's primary loan product and strategic focus is considered. The bank's lending to small businesses is lower than the level of small businesses within the AA and somewhat lower than the level of peer aggregate lending to small businesses. While the bank's level of penetration to small businesses in terms of gross revenue is lower than AA demographics and aggregate peer lending, the bank has continued to demonstrate commitment to its strategic focus, part of which is to meet the working capital or recurring financing needs of the small and medium-sized business within the AA. During the evaluation period, 76 percent of small business loans made were for amounts less than \$1 million dollars and 25 percent were for amounts less than \$100 thousand. Small business loan amounts were as low as \$10,000. We considered these amounts as lower dollar loans in context of the average size and complexity of businesses located within the Tarrant County AA and the greater Fort Worth metroplex.

Responses to Complaints

The bank did not receive any complaints during the evaluation period.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2017 to 12/31/2019	
Bank Products Reviewed:	Small Business Loans and Home Mortgage Loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
No Affiliates		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Texas		
Tarrant County AA	Full Scope	County of Tarrant. This AA consists of 357 whole census tracts. This AA consists of 357 whole census tracts. This county is part of the Fort-Worth Arlington MSA.

Appendix B: Summary of MMSA and State Ratings

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

Home Mortgage Loans: A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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 are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 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																				2017-19	
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		
Trinity Bank AA	34	12,244	100.0	63,445	5.2	11.76	2.9	18.8	8.82	14.5	34.4	23.53	36.5	41.5	52.94	46.1	0.0	2.94	0.0		
Total	34	12,244	100.0	63,445	5.2	11.76	2.9	18.8	8.82	14.5	34.4	23.53	36.5	41.5	--	46.1	0.0	2.94	0.0		
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data., Due to rounding, totals may not equal 100.0</i>																					

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																				2017-19
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	
Trinity Bank AA	34	12, 244	100	63,445	23.1	0.00	4.5	16.3	0.00	14.8	19.3	11.76	22.0	41.3	76.49	40.0	0.0	11.76	18.8	
Total	34	12, 244	100	63,445	23.1	0.0	4.5	16.3	0.00	14.8	19.3	11.76	22.0	41.3	76.49	40.0	0.0	11.76	18.8	

*Source: 2015 ACS Census ; 01/01/2017 - 12/31/2019 Bank Data,
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																			2017-19	
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	
Trinity Bank AA	80	58,511	100	42,463	6.4	7.5	7.3	20.8	17.50	21.0	27.4	30.00	28.3	45.2	43.75	43.2	0.1	0.00	0.1	
Total	80	58,511	100	42,463	6.4	7.5	7.3	20.8	17.50	21.0	27.4	30.00	28.3	45.2	43.75	43.2	0.1	0.00	0.1	

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2017-19**

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
Trinity Bank AA Tarrant Cn	80	58,511	100	42,463	87.1	25	42.3	4.0	71.25	8.9	3.75
Total	80	58,511	100	42,463	87.1	25	42.3	4.0	71.25	8.9	3.75

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019 Bank Data;
Due to rounding, totals may not equal 100.0*