

### **PUBLIC DISCLOSURE**

May 2, 2022

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of South Padre Island Charter Number: 18063

> 709 Padre Blvd South Padre Island, TX 78597

Office of the Comptroller of the Currency San Antonio Field Office 10001 Reunion Place, Suite 250 San Antonio, TX 75216

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

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### **Overall CRA Rating**

Institution's CRA Rating: This institution is rated Satisfactory

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable.
- A majority of the bank's loans are inside its assessment area (AA).
- The bank exhibits reasonable distribution of loans to individuals of different income levels and to businesses of different sizes given the product lines offered by the bank.
- The bank did not receive any CRA-related complaints during the evaluation period.

#### **Loan-to-Deposit Ratio**

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

First National Bank of South Padre Island's (FNB) quarterly average LTD ratio calculated on a bank-wide basis for the 19-quarter evaluation period is 53.66 percent. The LTD ratio ranged from a low of 32.31 percent on September 30, 2021, to a high of 66.65 percent on June 30, 2018. The LTD ratio reflects an improvement from the average of 49 percent during the prior evaluation period.

The bank's quarterly average LTD ratio is lower than the quarterly average LTD ratio for four similarly situated institutions. The bank experienced significant deposit growth during the pandemic due to stimulus checks, enhanced unemployment benefits, and PPP loans. This increased deposits over 63 percent from 2020 to 2021. In addition, many bank borrower's paid off their existing loans with the stimulus funds. The similarly situated institution's quarterly average LTD ratio was 64.32 percent ranging from a low of 61.82 percent to a high of 66.68 percent.

### **Lending in Assessment Area**

A majority of the bank's loans are inside its AA. The bank originated 59 percent of its total loans by number inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA level. The bank did not have any affiliate lending activities included in this assessment.

Lending Inside and Outside of the Assessment Area												
	N	lumber	of Loans			Dollar A						
Loan Category	Insi	de	Outsi	de	Total	Insid	e	Outsi	de	Total		
	#	% # % #		#	\$	%	\$	%	\$(000s)			
Home Mortgages	52	65	28	35	80	10,690	73	3,967	27	14,657		
Commercial	29	50	29	50	58	4,550	36	7,975	64	12,525		
Total	81	59	57	41	138	15,240	56	11,942	44	27,182		

Source: Bank Data

Due to rounding, totals may not equal 100.0%

### **Description of Institution**

FNB is a full-service, intrastate community bank headquartered in South Padre Island, TX. FNB is wholly owned by Laguna Madre Delaware Bancshares, which is 100 percent owned by Laguna Madre Bancshares Corporation of South Padre Island, Texas. The OCC did not review any affiliate activities during this evaluation. FNB has two branches, one in South Padre Island and one in Port Isabel, Texas. This makes up the two census tracts (CTs) in FNB's one AA. Additionally, FNB operates one branch located in Port Isabel, Texas. Both locations are in Cameron County, Texas and provide basic banking services, including two automated teller machines (ATMs). FNB has not opened or closed any locations since the prior CRA examination.

FNB's primary products consist of residential and commercial lending. As of December 31, 2021, Residential real estate loans totaled \$18,339,000 representing 68 percent of the portfolio while commercial credits totaled \$8,611,000 or 32 percent of the portfolio. The bank's focus is in South Padre Island due to the large number of homes and condos that are used as primary residences, 2<sup>nd</sup> homes, and investment/rental properties. FNB offers traditional loan and deposit services. Online banking services allow customers to view account activity, transfer funds, pay bills, send and receive messages, and download account information. Depositors can also access their accounts 24-hours through the telephone.

As of December 31, 2021, FNB reported total assets of \$87 million with \$80 million in total deposits. Net loans totaled \$27 million representing 31 percent of total assets and 34 percent of total deposits. Tier one capital totaled \$7 million and tier one leverage ratio was 7.7 percent.

In response to the Coronavirus Aid, Relief, and Economic Security Act or CARES Act established in 2020, FNB participated in the Small Business Administrations' Paycheck Protection Program (PPP). These loans were designed to provide a direct incentive for small businesses to keep their workers on payroll during the COVID pandemic. The bank originated 100 PPP loans totaling \$3.5 million between 2020 and 2021.

Based on the bank's financial condition, size, product offerings, and branch network, there are no legal, financial, or other factors that inhibit FNB's ability to help meet credit needs within its AA. The prior examination dated December 4, 2017, assigned an overall "Satisfactory" rating to FNB's CRA performance.

### **Scope of the Evaluation**

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

The evaluation period for this examination was January 1, 2018, through December 31, 2021. Qualifying lending activities performed in response to the Coronavirus pandemic during the evaluation period are included in this CRA evaluation.

Mortgage loan data reported under the Home Mortgage Disclosure Act (HMDA) from January 1, 2018, through December 31, 2019, was tested in May 2022 to verify accuracy of the reported data. It was determined the data in 2018 was reliable; however, the data for 2019 was not reliable for use in this evaluation. The bank did not meet HMDA reporting thresholds for 2020 and 2021 and was not required

to submit data. Separate transaction testing of home mortgage loans originated in 2019, 2020, and 2021 was completed and included in our analysis.

To evaluate lending performance, analysis was completed on 2018 HMDA data and a random sample of home mortgage loans and commercial loans. For the geographic and borrower distribution analysis, we compared lending performance data to the updated 2015 American Community Survey census data effective January 2017.

#### **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 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.

For analytical purposes, FNB has one AA consisting of two CTs within Cameron County which makes up the Brownsville/Harlingen MSA. The AA includes the towns of South Padre Island and Port Isabel, Texas where the bank operates. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

#### **Ratings**

The bank's overall rating is based on performance in the State of Texas. The state rating is based upon FNB's performance in their AA. We considered lending volume within the AA relative to the bank's capacity based on deposits, competition, and market presence. More weight was placed on loans to small businesses within their AA. Due to the bank's location, there are no low or moderate CTs within their AA. Refer to the "Scope" section under the State Rating section for details regarding how the areas were weighted in arriving at the respective rating.

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

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank 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.
- A majority of the bank's loans are inside its AA.
- The bank exhibits reasonable distribution of loans to individuals of different income levels and to businesses of different sizes given the product lines offered by the bank.
- The bank did not receive any CRA-related complaints during the evaluation period.

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

FNB is a full-service, intrastate community bank headquartered in South Padre Island, Texas. Additionally, FNB operates one branch located in Port Isabel, Texas. Both locations provide basic banking services, including automated teller machines (ATMs). FNB offers traditional loan and deposit services. Online banking services allow customers to view account activity, transfer funds, pay bills, send and receive messages, and download account information. Additionally, depositors can access funds 24-hours a day via the two drive up ATMs, located at both locations, and 24-hours a day account access through telephone is also available.

#### **FNB South Padre Island AA**

The AA contains two census tracts one middle- and one upper-income. There are no low or moderate income CTs within the bank's AA. The bank's AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income geographies.

The largest industries within the AA are Education/Health services employing 30 percent, Government at 21.1 percent, and Leisure and Hospitality Services at 10.3 percent. Low-wage home healthcare employees a third of those healthcare workers representing nine percent of the entire workforce. The unemployment rate of seven percent is declining but remains higher than pre-pandemic levels.

The banks focus is on home mortgage products in South Padre Island due to the large number of homes and condos that customers and residents use as primary residence, 2<sup>nd</sup> homes, and investment/rental properties. The AA has a competitive bank environment that includes institutions of all sizes. The FDIC's June 30, 2021, Deposit Market Share report reflects six institutions operating eight branches within the AA. FNB ranks third with a deposit market share of 15.86 percent.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #			
Geographies (Census Tracts)	2	0.0	0.0	50.0	50.0	0.0			
Population by Geography	7,726	0.0	0.0	58.3	41.7	0.0			
Housing Units by Geography	10,800	0.0	0.0	20.2	79.8	0.0			
Owner-Occupied Units by Geography	2,336	0.0	0.0	46.1	53.9	0.0			
Occupied Rental Units by Geography	1,236	0.0	0.0	49.1	50.9	0.0			
Vacant Units by Geography	7,228	0.0	0.0	6.9	93.1	0.0			
Businesses by Geography	1,197	0.0	0.0	30.2	69.8	0.0			
Farms by Geography	10	0.0	0.0	50.0	50.0	0.0			
Family Distribution by Income Level	2,067	25.0	10.1	13.1	51.9	0.0			
Household Distribution by Income Level	3,572	25.3	11.1	17.0	46.5	0.0			
Median Family Income MSA – 15180 Brownsville-Harlingen, TX MSA		\$36,941	Median Housii	ng Value		\$177,741			
		Median Gross Rent							
	Families Below Poverty Level 26.								

To help identify needs and opportunities within the AA we interviewed a community contact at a local economic development organization and found the primary needs are small business lending and home mortgages for tourism.

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

As the bank's only AA, the FNB South Padre Island AA received a full scope review.

### **Lending Test**

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

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

Based on a full-scope review, the bank's performance in the FNB South Padre Island AA is good.

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

There are no low- or moderate- income CTs within the AA; an analysis of the bank's geographic distribution of loans would not be meaningful.

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

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

#### Home Mortgage Loans

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

The review of home mortgage loan data indicates the bank's made no loans to both low- and moderate-income borrowers. We found this reasonable, in part, because of high real estate values in the AA, especially South Padre Island, caused by its location on the Gulf of Mexico and the area being a high tourist destination. The high real estate costs prohibit many local borrowers from qualifying for residential loans. According to the South Padre Island Board of Realtors, as of April 2022, the median home price is \$444,500 on South Padre Island and \$222,000 on Port Isabel.

#### 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 distribution of small loans to businesses is reasonable. The percentage of bank loans to businesses with annual revenues of \$1 million or less is below the reported percentage of small businesses in the AA but significantly exceeds the aggregate percentage reported by other business lenders in the AA.

#### **Responses to Complaints**

FNB did not receive any complaints related to its CRA or fair lending performance 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:	(January 1, 2018 - Decemb	(January 1, 2018 - December 31, 2021)								
Bank Products Reviewed:	Home mortgage and small	Home mortgage and small business								
Affiliate(s)	Affiliate Relationship	Products Reviewed								
None	Not Applicable	Not Applicable								
List of Assessment Areas and Typ	e of Examination									
Rating and Assessment Areas										
State of Texas										
FNB South Padre Island AA	Full Scope	CTs 123.05 and 123.04 in Cameron County								

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

RATINGS: First National Bank of South Padre Island									
Overall Bank:	Lending Test Rating								
First National Bank of South Padre Island	Satisfactory								
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 30<sup>th</sup> of each year. Tables without data are not included in this PE.

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

- **Table O.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the 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.
- 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 S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography
   The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size)

throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- **Table T.** Assessment Area Distribution of Loans to Farms by Gross Annual Revenues Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer 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 households in those geographies.
- **Table V.** Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table P:	Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower       201											2018-21							
Total Home Mortgage Loans Low-Income Borro					orrowers		lerate-I Borrow		Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
Assessment Area:	#	\$		Overall Market	Familias	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
FNB South Padre Island AA	52	10,690	100.0	421	25.0	0.0	0.7	10.1	0.0	1.9	13.1	8.0	6.2	51.9	92.0	77.4	0.0	0.0	13.8
Total	52	10,690	100.0	421	25.0		0.7	10.1	-	1.9	13.1	8.0	6.2	51.9	92.0	77.4	0.0	0.0	13.8

Source: 2015 ACS Census; 01/01/2018 - 12/31/2021 Bank Data, 2019 HMDA 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       2018-21											
	Total Loans to Small Businesses  Businesses with Revenues <= 1MM  Businesses with Revenues > 1MM  Not Av										
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FNB South Padre Island AA	20	2,456	100	384	85.6	69.0	33.9	4.8	24.0	9.5	7.0
Total	20	2,456	100	384	85.6	69.0	33.9	4.8	24.0	9.5	7.0

Source: 2019 D&B Data; 01/01/2018 - 12/31/2021 Bank Data; 2019 CRA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%