



## **PUBLIC DISCLOSURE**

October 15, 2021

# **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Bank of Brenham, National Association  
Charter Number: 24153

501 S. Austin Street  
Brenham, TX 77833

Office of the Comptroller of the Currency

Houston Field Office  
909 Fannin Street, Suite 1900  
Houston, TX 77010

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



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## Overall CRA Rating

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

**The lending test is rated: Satisfactory**

The major factors that support this rating include:

- The Lending Test rating is based on:
  - Bank of Brenham's (BoB) loan-to-deposit (LTD) ratio is reasonable given the bank's performance context.
  - A majority of loans originated during the evaluation period were located in the bank's assessment area (AA).
  - The bank exhibits excellent geographic distribution of loans.
  - The bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.
- The bank exhibits excellent responsiveness to community development (CD) needs in the Washington County AA through CD loans, qualified donations, and CD services. The bank also made regional investments to local schools and municipalities.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA(s), the bank's LTD ratio is reasonable. BoB's LTD ratio is below average when compared to similarly situated institutions, but it is reasonable given the bank's performance context. For the 11 quarters since the previous evaluation, the bank's LTD averaged 16.85 percent. The average LTD ratio of six similarly situated institutions located in Austin, Fayette, and Washington counties was 37.01 percent. Similarly situated institutions LTDs ranged from a low of 17.57 percent to a high of 54.37 percent. Adjusting the LTD ratio for public funds deposits yielded BoB an adjusted LTD ratio of 24.78 percent, which is comparable to the average of similar situated institutions.

As of December 31, 2020, BoB reported \$165 million in public funds. Furthermore, in year 2020, BoB originated and sold 84 home mortgage loans totaling 21.1 million. Including the total of these loans, would further adjust the LTD to 31.51 percent for year-end 2020.

### Lending in Assessment Area

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

The bank originated and purchased 78.6 percent of its total loans inside its AAs during the evaluation period. This analysis is performed at the bank level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

<b>Lending Inside and Outside of the Assessment Area</b>										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$(000)	%	\$(000)	%	
Home Mortgage	41	73.2	15	26.8	56	4,998	73.4	1,814	26.6	6,812
Small Business	77	77.0	23	23.0	100	12,545	71.9	4,907	28.1	17,452
PPP loans	48	80.0	12	20.0	60	3,113	81.0	731	19.0	3,844
Consumer	51	85.0	9	15.0	60	785	84.0	150	16.0	935
<b>Total</b>	<b>217</b>	<b>78.6</b>	<b>59</b>	<b>21.4</b>	<b>276</b>	<b>21,441</b>	<b>73.8</b>	<b>7,602</b>	<b>26.2</b>	<b>29,043</b>

## Description of Institution

BoB is a one office community bank located at 501 S. Austin Street in Brenham, TX. The bank is wholly owned by Industry Bancshares, Inc., a six-bank holding company, located in Industry, Texas. The bank has one AA which includes one moderate, two middle, and three upper-income census tracts (CTs). There are no low-income CTs in the AA.

The bank is a full-service institution and offers a variety of deposit products to business and personal customers. Deposit products include checking, savings, individual retirement, health savings, and money market products. The bank also offers various business loans including, term loans, lines of credit, agricultural, equipment, and commercial real estate. Personal loan products include residential mortgage, lines of credit, overdraft protection, and personal loans.

Banking hours and services are reasonable. Lobby hours are 9:00 a.m. to 4:00 p.m. Monday through Thursday and 9:00 a.m. until 5:00 p.m. on Friday. Motor bank hours are 7:30 a.m. to 5:30 p.m. Monday through Friday, and Saturday lobby and motor bank hours are 9:00 a.m. to 12:00 p.m. There is also an onsite automated teller machine. The bank offers online banking, bill pay, and mobile banking to its personal and business customers. Services available to business customers include cash management, merchant services, remote deposit capture, and positive pay. There were no branch openings or closings during the evaluation period.

As of December 31, 2020, BoB reported total assets of \$566 million, net loans and leases of \$78 million, and tier 1 capital of \$31 million. By Deposit Market Share, the bank is ranked first and has 32.9 percent of the deposit market share in the AA.

There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA. The previous CRA evaluation dated July 30, 2018 resulted in an overall satisfactory rating.

## **Scope of the Evaluation**

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

We conducted an evaluation of BoB to assess compliance with the Community Reinvestment Act (CRA) within the bank's AA. BoB was evaluated under the Small Bank examination procedures, which includes the Lending Test. The Lending Test evaluates the bank's record of meeting the credit needs of its AA through its lending activities. CD activities are optional for a small bank; however, the bank submitted qualifying activities, which had a positive effect on its overall rating. This examination evaluated the bank's lending performance from January 1, 2018 through December 31, 2020.

The loan portfolio is composed by dollar volume as follows: home mortgage loans represented 44 percent, business loans represented 31 percent, and consumer loans represented 3 percent, respectively of gross loans. By number, home mortgage loans represented 26 percent, business loans represented 24 percent, and consumer loans represented 26 percent. As the number of loans of all three products is comparable, we gave equal weight to home mortgage, business loans, including the Small Business Administration (SBA) Paycheck Protection Program (PPP) loans, and consumer loans. We chose samples from each of the four products (home mortgage, business, PPP, and consumer loans) to evaluate the bank's overall performance. The samples consisted of 56 home mortgage loans, 100 business loans, 60 PPP loans, and 60 consumer loans. The PPP loans were a special SBA loan product developed in response to the 2020 COVID-19 pandemic (pandemic). The PPP loans did not have an income requirement, therefore we only evaluated these for the in/out ratio above and geographic distribution.

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

The bank has designated Washington County as its only AA. A full-scope review was performed on this AA.

Refer to the "Scope" section in appendix A for more information.



## **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 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 of Texas**

**Washington County AA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Washington County</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	6	0.0	16.7	33.3	50.0	0.0
Population by Geography	34,236	0.0	10.1	32.6	57.3	0.0
Housing Units by Geography	15,667	0.0	9.5	33.9	56.6	0.0
Owner-Occupied Units by Geography	8,820	0.0	8.7	36.3	55.0	0.0
Occupied Rental Units by Geography	3,132	0.0	12.7	24.7	62.6	0.0
Vacant Units by Geography	3,715	0.0	8.7	36.0	55.2	0.0
Businesses by Geography	2,972	0.0	11.9	27.2	60.9	0.0
Farms by Geography	175	0.0	4.6	41.1	54.3	0.0
Family Distribution by Income Level	8,409	16.3	15.9	18.9	48.9	0.0
Household Distribution by Income Level	11,952	19.0	14.5	16.1	50.4	0.0
Median Family Income Washington County		\$52,198	Median Housing Value			146,487
			Median Gross Rent			754
			Families Below Poverty Level			10.0%
<i>Source: 2020 ACS Census and 2020 D&amp;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.</i>						

Blue Bell Creameries is the largest employer in the AA followed by Blinn College. Brenham is the largest city in Washington County. We made a total of three community contacts in the area. We made one community contact to the local housing authority in the area. There is a lack of affordable housing in the area. There have been delays in future developments due to the pandemic. We also made a community contact to an organization providing community services in Brazos Valley, which includes Washington County. This contact indicated there was an increased need for rent and utility assistance as a result of the pandemic. One economic development corporation stated there was a need to support small businesses in the area, as many of these were not able to participate in the PPP through the SBA.

## **LENDING TEST**

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

### **Conclusions for (Area/Areas) Receiving (a Full-Scope Review/Full-Scope Reviews)**

Based on a full-scope review, the bank's performance in the Washington County AA is good. The Washington County AA does not have any low-income CTs.

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

The bank exhibits excellent geographic distribution of loans.

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

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

Geographic distribution of home mortgage loans reflects poor dispersion. The percentage of loans originated in moderate-income CTs is below both the percentage of owner-occupied housing units and the aggregate comparators in the AA. The bank has only one moderate-income tract. This tract is mostly industrial in nature.

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

Refer to Table Q in 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.

Geographic distribution of business loans reflects excellent dispersion. The percentage of loans originated in moderate-income CTs significantly exceeds both the percentage of businesses in the AA and the aggregate comparators.

Geographic distribution of PPP loans also reflects excellent dispersion. The percentage of loans originated in moderate-income CTs is near to the percentage of businesses in the AA, and equal to the aggregate comparators.

#### ***Consumer Loans***

Refer to Table U appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Geographic distribution of consumer loans reflects excellent dispersion. The percentage of loans originated in moderate-income CTs significantly exceeds the percentage of households in the AA.





## **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, given the product lines offered by the bank.

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

Refer to Table P in 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 has reasonable dispersion to low-income borrowers for home mortgage loans in the AA. The percentage of bank loans to low-income borrowers is below the percentage of families in the AA; however, the percentage of bank loans exceeds the aggregate comparators. The bank has excellent dispersion to moderate-income borrowers for home mortgage loans in the AA. The percentage of bank loans to moderate-income borrowers is near to the percentage of families in the AA. The percentage of bank loans to moderate-income borrowers exceeds the aggregate comparators.

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

Refer to Table R in 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.

Distribution of loans to businesses of different sizes reflects reasonable dispersion. The percentage of bank loans to small businesses is below the percentage of businesses in the AA; however, the percentage of bank loans to small businesses exceeds the aggregate comparators. It is important to note that 28.5 percent of the sampled loans did not have income available.

As PPP loans do not require income for approval, we were unable to perform a revenue analysis on these types of loans.

### ***Consumer Loans***

Refer to Table V in appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The bank has excellent dispersion to both low-and-moderate income borrowers for consumer loans in the AA. The percentage of bank loans to both low-and-moderate income borrowers significantly exceeds the percentage of households in the AA.

## **Responses to Complaints**

The bank did not have any CRA-related complaints during the evaluation period.

**COMMUNITY DEVELOPMENT**

Based on a full-scope review, the bank exhibits excellent responsiveness to CD needs in the Washington County AA through CD loans, qualified donations, and CD services, as appropriate, considering the bank’s capacity and the need for and availability of such opportunities for CD in the bank’s AA. Performance related to CD activities had a positive effect on the bank’s rating in the state.

**Number and Amount of Community Development Loans**

Refer to the Community Development Loans table below for the facts and data used to evaluate the bank’s level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000’s)	% of Total \$
Washington County	4	100%	10,100	100%

The Community Development Loans table, shown above, sets forth the information and data used to evaluate the bank’s level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. The loans included one multifamily loan which provided affordable housing, one loan to a local government authority to provide critical infrastructure to a moderate-income CT, one loan to a local organization which provides services to low-and-moderate income families, and one loan to a local company that provided jobs to low-and-moderate income persons.

**Number and Amount of Qualified Investments**

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Washington County	0	0	14	27	14	100%	27	100%	0	0
Regional	0	0	16	17,860	16	100%	16	17,860	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.



The bank made fourteen donations to organizations in the AA which provided services to low-and-moderate income persons. In addition, the bank had sixteen investments to regional schools with over 50 percent of disadvantaged children and municipalities which funded improvements in disaster areas.

### **Extent to Which the Bank Provides Community Development Services**

The bank is responsive to CD opportunities in its AA. The bank's officers and board members serve as board of director and committee members for local organizations in the AA, which provide services to low-and-moderate income persons and encourage economic development in the area. These include a local hospital, an economic development corporation, an organization which provides rent, utility bill, food and medical expense assistance, and a tax increment reinvestment zone committee.

In addition, although not CD qualified, the bank waived fees and offered loan deferrals to customers during the pandemic. The bank became a SBA lender to accommodate PPP loans for their local business customers. The bank also waived fees during the 2021 ice storm to assist customers.

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

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the full-scope area.

<b>Time Period Reviewed:</b>	01/01/2018 to 12/31/2021	
<b>Bank Products Reviewed:</b>	(Home mortgage, small business, PPP loans, consumer loans) (CD loans, qualified investments, CD services)	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Washington County</b>	<b>Full-Scope</b>	(Home mortgage, small business, PPP loans, consumer loans) (CD loans, qualified donations and investments, CD services)

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

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<b>RATINGS</b>	<b>State of Texas</b>
Overall Bank:	Lending Test Rating
<b>State of Texas</b>	<b>Satisfactory</b>

## Appendix C: Definitions and Common Abbreviations

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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/AA.

**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. CTs nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, CTs 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 non-MSA 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.

**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 CT delineated by the U.S. Bureau of the Census in the most recent decennial census.

**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 CT 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/AA 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 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 (MD):** 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 MD 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 (MSA):** 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 MSA 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 multistate MSA (MMSA). 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 MMSA, the institution will receive a rating for the MMSA.

**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 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

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas (MMSAs), 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/AA. Deposit data are compiled by the Federal Deposit Insurance Corporation 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/AA. 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 AA.
- 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 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/AA.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** **2018-2020**

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
Washington County	41	4,998	100	1,126	0.0	-- 0.0	0.0	8.7	-- 4.6	7.6	36.3	29.6 -	35.0	55.0	65.9 -	57.4	0.0	0.0	0.0
<b>Total</b>	<b>41</b>	<b>4,998</b>	<b>100</b>	<b>1,126</b>	<b>0.0</b>	<b>-- 0.0</b>	<b>0.0</b>	<b>8.7</b>	<b>-- 4.6</b>	<b>7.6</b>	<b>36.3</b>	<b>-- 29.6</b>	<b>35.0</b>	<b>55.0</b>	<b>-- 65.9</b>	<b>57.4</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>

Source: 2020 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 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 2018-2020**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$(000)	% of Total	Over all Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Washington County	41	4,998	100	1,126	16.3	4.6-	1.6	15.9	13.6-	8.9	18.9	20.5--	16.7	48.9	61.3--	60.4	0.0	--	0.0	12.4
<b>Total</b>	<b>41</b>	<b>4,998--</b>	<b>100</b>	<b>1,126</b>	<b>16.3</b>	<b>4.6-</b>	<b>1.6</b>	<b>15.9</b>	<b>13.6-</b>	<b>8.9</b>	<b>18.9</b>	<b>20.5--</b>	<b>16.7</b>	<b>48.9</b>	<b>61.3-</b>	<b>60.4</b>	<b>0.0</b>	<b>-</b>	<b>0.0-</b>	<b>12.4</b>

Source: 2020 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 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 (Washington County) 2018-2020**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$(000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Business loans	--77	12,545	80	793	0.0	--0.0	0.0	11.9	15.6	10.6	27.2	19.5	31.0	60.9	64.9	58.4	0.0	--0.0	0.0
PPP Loans	47	3,096	20	793	0.0	0.0	0.0	11.9	10.6	10.6	27.2	25.5	31.0	60.9	63.8	58.4	0.0	0.0	0.0
<b>Total</b>	<b>124</b>	<b>15,641</b>	<b>100</b>	<b>793</b>	<b>0.0</b>	<b>--0.0</b>	<b>0.0</b>	<b>11.9</b>	<b>-13.1</b>	<b>10.6</b>	<b>27.2</b>	<b>22.5</b>	<b>31.0</b>	<b>60.9</b>	<b>64.4</b>	<b>58.4</b>	<b>0.0</b>	<b>--0.0</b>	<b>0.0</b>

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 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 (Washington County) 2018-2020**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$(000)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Business Loans	--77	12,545	100	793	85.1	50.7	40.5	4.8	20.8	10.1	28.5
<b>Total</b>	<b>77</b>	<b>12,545</b>	<b>100</b>	<b>793</b>	<b>85.1</b>	<b>50.7</b>	<b>40.5</b>	<b>4.8</b>	<b>20.8</b>	<b>10.1</b>	<b>28.5</b>

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.  
 Due to rounding, totals may not equal 100.0% - PPP loans do not require collection of revenue information

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2018-2020</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$ (000)	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Washington County	51	785	100	0.0	0.0	9.7	13.7	33.3	41.2	57.0	45.1	0.0	0.0	

*Source: 2020 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.  
Due to rounding, totals may not equal 100.0%*

<b>Table V: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2018-2020</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$ (000)</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Washington County	51	785	100	19.0	37.3	14.5	21.6	16.1	21.6	50.4	20.0	0.0	0.0	
<b>Total</b>	<b>51</b>	<b>785</b>	<b>100</b>	<b>19.0</b>	<b>37.3</b>	<b>14.5</b>	<b>21.6</b>	<b>16.1</b>	<b>21.6</b>	<b>50.4</b>	<b>20.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2020 ACS Census; 01/01/2018 - 12/31/2020 Bank Data.  
Due to rounding, totals may not equal 100.0%*