

PUBLIC DISCLOSURE

March 20, 2023

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

WestStar Bank
RSSD # 1447639
500 North Mesa Street
El Paso, Texas 79901

Federal Reserve Bank of Dallas
2200 North Pearl Street
Dallas, Texas 75201

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, nor should it 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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INSTITUTION RATING

INSTITUTION’S COMMUNITY REINVESTMENT ACT RATING: OUTSTANDING

The following table indicates the Community Reinvestment Act (CRA) performance level of WestStar Bank (WestStar or bank) with respect to the Lending, Investment, and Service Tests.

Performance Levels	WestStar Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	
High Satisfactory			X
Low Satisfactory			
Needs to Improve			
Substantial Non-Compliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

SUMMARY OF MAJOR FACTORS SUPPORTING RATING

Major factors supporting WestStar’s rating include:

- Lending activity reflects excellent responsiveness to the credit needs of the assessment areas (AAs).
- A substantial majority of loans are made in the bank’s AAs.
- The geographic distribution of loans reflects excellent penetration throughout the AAs.
- The distribution of the bank’s small business lending reflects adequate penetration among businesses of different revenue sizes.
- An adequate record of servicing the credit needs of low-income areas and very small businesses.
- WestStar is a leader in making community development (CD) loans and providing CD services.
- The bank makes use of innovative and/or flexible lending practices in serving AAs’ needs.
- WestStar has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors and is often in a leadership position.
- While the bank makes rare use of innovative and/or complex investments to support CD initiatives, WestStar exhibits good responsiveness to credit and CD needs.
- Delivery systems are readily accessible to the bank’s geographies and individuals of different income levels in the AAs.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly low- and moderate-income (LMI) geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences the bank’s AAs, particularly LMI geographies and/or LMI individuals.

INSTITUTION

DESCRIPTION OF THE INSTITUTION

WestStar, an interstate commercial bank headquartered in El Paso, Texas, has the following characteristics:

- Is a wholly owned subsidiary of WestStar Bank Holding Company Inc, a one-bank holding company also located in El Paso, Texas.
- Operates three wholly owned subsidiaries: WestStar Insurance Agency, Inc.; WestStar Title, LLC.; and WestStar Tower Properties, LLC.
- Reported total assets of approximately \$2.8 billion as of December 31, 2022.
- Delineates two AAs that remain unchanged from the prior evaluation dated February 24, 2020: El Paso County Metropolitan AA in Texas and Las Cruces, NM MSA AA in New Mexico.
- Operates 14 branch offices and 14 deposit taking automated teller machines (ATMs) throughout its geographic footprint. Thirteen branches are in the state of Texas and one is located in New Mexico.
- Is primarily focused on commercial lending, which represents 80.4 percent of its loan portfolio, as illustrated by the table below.

Composition of Loan Portfolio as of December 31, 2022		
Loan Type	\$(000)	%
Construction and Land Development	375,255	20.0
Farmland	58,166	3.1
1-4 Family Residential Real Estate	57,584	3.1
Multifamily Residential Real Estate	118,664	6.3
Non-Farm Non-Residential Real Estate	851,324	45.5
Agricultural	1,779	0.1
Commercial and Industrial	278,430	14.9
Consumer	1,034	0.1
Other	129,361	6.9
Gross Loans	1,871,597	100.0
Note: Percentages may not total 100.0 due to rounding.		

The Federal Reserve Bank of Dallas (Reserve Bank) rated the bank's CRA performance as **Outstanding** at the previous performance evaluation dated February 24, 2020. The bank received an **Outstanding** rating under the Lending Test, an **Outstanding** rating under the Investment Test, and a **High Satisfactory** rating under the Service Test. There are no known legal, financial, or other factors impeding the bank's ability to help meet the credit needs of its communities.

SCOPE OF THE EVALUATION

Examiners utilized the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Large Retail Institutions* to evaluate WestStar's CRA performance. The evaluation considered CRA performance context, including the bank's asset size, financial condition, business strategy, and market competition, as well as the AAs' credit needs and their demographic and economic characteristics. Performance was assessed within the bank's two

AAs: El Paso County Metropolitan AA and Las Cruces, NM Metropolitan Statistical Area (MSA) AA. Because the bank delineates a single AA in each of the states in which it operates, both AAs received full-scope reviews.

Though the bank continues to develop its presence in the state of New Mexico, the substantial majority of the bank's lending, deposits, and branch offices are located in the state of Texas. Accordingly, the bank's activity in the state of Texas was given greater weight than the activity in New Mexico when assessing the bank's overall performance. Examiners reviewed the following data to assess the bank's CRA performance:

- The bank's 2019, 2020, and 2021 small business and small farm loans reported as CRA loan data.
- Retail banking services, CD services, and CD loans originated between February 25, 2020, and March 20, 2023.
- Qualified investments, grants, donations, or in-kind contributions of property made between February 25, 2020 and March 20, 2023, as well as qualified investments made prior to this period but still outstanding.
- Information provided by two community leaders to help gain a better perspective of the local economic conditions, possible credit needs, and the responsiveness of financial institutions in meeting such needs within the AAs.

The bank extended a limited volume of Home Mortgage Disclosure Act (HMDA) and small farm loans between January 1, 2020 and December 31, 2022. Therefore, a meaningful analysis of HMDA and small farm loans could not be conducted for this evaluation.

Neither the bank nor the Reserve Bank received any CRA-related complaints since the previous evaluation; as such, this performance criterion was not considered when assessing the bank's CRA performance.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's overall Lending Test performance is Outstanding. The bank's performance in Texas is also rated Outstanding, while the Lending Test for New Mexico is rated High Satisfactory. Lending activity reflects good responsiveness to AAs' credit needs. The geographic distribution of loans, as well as the distribution of loans to businesses of different revenue sizes, are excellent. In addition, WestStar's lending has an overall adequate penetration among businesses and farms of different sizes.

Lending Activity

This performance criterion evaluates the bank's lending volume considering the bank's resources and business strategy and other information from the performance context. The bank's overall lending activities reflect excellent responsiveness to AAs' credit needs. The table below summarizes the bank's lending activity between January 1, 2019 and December 31, 2021, noting that the bank originates more small business loans than other type of loans.

Summary of Lending Activity January 1, 2019 – December 31, 2021				
Loan Type	#	#%	\$(000s)	\$%
Home Improvement	2	0.0	105	0.0
Home Purchase	26	0.6	5,545	0.7
Multi-Family Housing	14	0.3	13,186	1.7
Refinancing	1	0.0	245	0.0
Other Purpose Closed-End	2	0.0	92	0.0
Total HMDA Loans	45	1.0	19,173	2.5
Small Business Loans	4,397	98.2	751,879	96.8
Small Farm Loans	35	0.8	5,836	0.7
Total Loans	4,477	100.0	776,888	100.0

Note: Percentages may not total precisely due to rounding.

The bank makes use of innovative and/or flexible lending programs to serve the AAs' credit needs, including LMI borrowers. During this evaluation period, WestStar did not extend any innovative lending; however, the bank participated in numerous industry-recognized government-guaranteed lending programs, displaying flexibility in serving the credit needs of its communities. The bank was also very active in the Small Business Administration's (SBA) Paycheck Protection Program (PPP), originating more than 2,800 loans in 2020 and 2021. These loans were made as a response to the Coronavirus Disease 2019 (COVID-19) pandemic and were considered particularly responsive to the financial burden placed on consumers, small businesses, and small farms related to the pandemic.

Assessment Area Concentration

This performance criterion evaluates the percentage of lending extended inside and outside of the bank's AAs. As illustrated in the table below, a substantial majority of the bank's total loans, by number and dollar volume, were originated inside the bank's AAs.

Assessment Area Concentration								
Loan Type	Inside				Outside			
	#	#%	\$(000s)	\$%	#	#%	\$(000s)	\$%
Home Improvement	2	100.0	105	100.0	0	0.0	0	0.0
Home Purchase	24	92.3	3,781	68.2	2	7.7	1,764	31.8
Multi-Family Housing	14	100.0	13,186	100.0	0	0.0	0	0.0
Refinancing	1	100.0	245	100.0	0	0.0	0	0.0
Other Purpose Closed-End	2	100.0	92	100.0	0	0.0	0	0.0
Total HMDA Loans	43	95.6	17,409	90.8	2	4.4	1,764	9.2
Small Business Loans	4,236	96.3	706,752	94.0	161	3.7	45,127	6.0
Small Farm Loans	27	77.1	4,590	78.6	8	22.9	1,246	21.4
Total Loans	4,306	96.2	728,751	93.8	171	3.8	48,137	6.2

Note: Percentages may not total precisely due to rounding.

The remaining loan distribution analyses discussed in this performance evaluation consider only those loans originated within the bank's AAs. As the bank ceased collecting and reporting HMDA loan data as of January 1, 2020, the loan distribution of this product is not discussed in this performance evaluation. Additionally, the bank did not originate a sufficient volume of small farm loans in either AA to allow for meaningful analysis to be conducted on this product.

Geographic Distribution and Distribution by Business Revenue Size

Consistent with the performance standards for a large bank, the geographic lending distribution considers the number and amount of loans extended in low-, moderate-, middle-, and upper-income geographies within WestStar’s AAs while the lending distribution considers the number of small business loans extended to businesses of different revenue sizes.

The geographic distribution of loans reflects excellent dispersion throughout the AAs based on the excellent penetration noted in the state of Texas and good penetration within the state of New Mexico. The bank’s overall borrower lending distribution reflects adequate penetration among businesses of different revenue sizes, with the state ratings for Texas and New Mexico being consistent with the overall rating.

A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for each AA.

Community Development Lending

The bank is a leader in making CD loans, originating or renewing 126 CD loans for approximately \$359.6 million during the review period. This represents a substantial increase, 129 percent by number and 87 percent by dollar volume, from the CD loans originated during the previous evaluation. The majority of CD loans (80.9 percent) were originated in the El Paso County Metropolitan AA. For this reason, the El Paso County Metropolitan AA was given most weight in evaluating the bank’s CD lending. Several CD loans originated to borrowers outside of the bank’s delineated AAs were considered, as they were responsive to meeting community service needs to LMI individuals.

The CD loans originated during the evaluation period were extended for a variety of purposes, though the majority related to the revitalization and stabilization of LMI geographies. While these loans included significant involvement in the SBA’s PPP, the bank also originated several large CD loans targeted at revitalizing and stabilizing its AAs, including one to finalize the construction of a high-rise in Downtown El Paso intended to revitalize the area. The table below summarizes the bank’s CD lending.

Community Development Lending All Assessment Areas		
Purpose	#	\$(000s)
Affordable Housing	4	3,230
Community Services	17	33,314
Economic Development	11	42,920
Revitalize and Stabilize	94	280,161
Total	126	359,625

INVESTMENT TEST

The bank’s overall Investment Test rating is Outstanding. The state rating for Texas is consistent with the overall rating, while the state rating for New Mexico is High Satisfactory.

This performance criterion evaluates the bank’s level of qualifying investments, grants, donations, or in-kind contributions of property made since the prior evaluation that have a primary purpose

of CD. Overall, the bank has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors. The volume and amount of such investments and grants often positions the bank as a leader. During the review period, the bank made five qualified investments focused on affordable housing, for a total of \$24.2 million. In addition, WestStar extended 355 donations, totaling \$1.1 million, within its AAs. This is a notable increase from the bank’s CD donations at the prior evaluation. Furthermore, several donations provided to qualified organizations outside of the bank’s delineated AAs were considered, as they were responsive to meeting the needs of the community. Detailed discussions of the facts and data related to the bank’s CD investments in each AA are in the Conclusions with Respect to Performance Test sections of this report.

Investments, Grants, and Donations Assessment Area: All								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	3	6,150	5	24,224	5	15	13	30,389
Community Services	2	2,505	0	0	287	616	289	3,121
Economic Development	1	1,335	0	0	59	757	60	2,092
Revitalization and Stabilization	0	0	0	0	7	10	7	10
Total	6	9,990	5	24,224	358	1,398	366	35,612
¹ Book value of investment ² Original market value of investment								

SERVICE TEST

The bank’s overall Service Test rating is High Satisfactory. The state rating for Texas is consistent with the overall rating, while the state rating for New Mexico is Low Satisfactory. Specific details of the service performance are issued in the respective AAs’ section of this report.

Retail Services

This performance criterion evaluates the bank’s level of service-delivery systems provided in each geography classification. Refer to the table below for the distribution of banking offices and full-service ATMs by income level of geographies.

Branch locations and alternative delivery systems, such as drive-through facilities, are readily accessible to the bank’s AAs and individuals of different income levels. The overall distribution of branch offices and full-service ATMs generally align with the total percentage of census tracts by income level throughout its AAs. The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals.

Products, services, and business hours do not vary in a way that inconveniences LMI individuals or geographies. Lobby hours and drive-through services are consistent throughout the bank’s AAs.

Retail Locations							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	6.4	4.1	6.9	2	14.3	2	14.3
Moderate	34.7	28.7	28.3	4	28.6	4	28.6
Middle	33.2	32.5	29.6	3	21.4	3	21.4
Upper	25.2	34.8	34.9	5	35.7	5	35.7
Unknown	0.5	0.0	0.4	0	0.0	0	0.0
Total	100.0	100.0	100.00	14	100.0	14	100.0

Note: Percentages may not total precisely due to rounding

Community Development Services

The bank is a leader in providing CD services. The state rating for Texas is consistent with the overall rating, while the bank provides a relatively high level of CD services in New Mexico. WestStar provided approximately 14,607 hours of CD services to 123 qualified organizations during the review period. Compared to the previous evaluation, the bank served more organizations and increased the hours of service provided.

The bank’s directors, officers, and team members engage in numerous organizations and activities that promote financial literacy, community services, economic development, and affordable housing for LMI individuals, residents, and small businesses within the AAs. Additionally, the bank received credit for qualified CD services that were provided outside of the AAs, as these services fostered financial literacy, promoted women owned businesses, and prevented human trafficking.

Community Development Services Assessment Area: All			
Purpose	Total Services	Total Hours	Total Organizations
Affordable Housing	0	0	0
Community Services	500	8,539	84
Economic Development	102	5,324	36
Revitalization and Stabilization	86	744	3
Total	688	14,607	123

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified. The bank is in compliance with the substantive provisions of the anti-discrimination laws and regulations. Established policies and procedures are designed to ensure ongoing compliance with applicable laws and regulations.

STATE OF TEXAS

CRA RATING FOR TEXAS: OUTSTANDING

The Lending Test is Rated: Outstanding
The Investment Test is Rated: Outstanding
The Service Test is Rated: High Satisfactory

MAJOR FACTORS SUPPORTING THE INSTITUTION'S RATING FOR TEXAS

- Lending activity reflects excellent responsiveness to the AA's credit needs.
- The geographic distribution of loans reflects excellent penetration throughout the AA.
- The distribution of the bank's small business lending reflects adequate penetration among businesses of different revenue sizes.
- A good record of servicing the credit needs of low-income areas and very small businesses.
- WestStar is a leader in making CD loans and providing CD services.
- The bank makes use of innovative and/or flexible lending practices in serving AA's needs.
- WestStar has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors. The volume and amount of such investments and grants often positions the bank as a leader.
- While the bank makes rare use of innovative and/or complex investments to support CD initiatives, WestStar exhibits good responsiveness to credit and CD needs.
- Delivery systems are readily accessible to the bank's geographies and individuals of different income levels in the AA.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly LMI geographies and/or LMI individuals.
- Services do not vary in a way that inconveniences the bank's AA, particularly LMI geographies and/or LMI individuals.

SCOPE OF THE EVALUATION

The bank designates a single AA in Texas. According to FFIEC procedures, a minimum of one AA from each state must be reviewed using full-scope examination procedures for interstate institutions. Therefore, the bank's single AA in the state of Texas, El Paso County Metropolitan AA, received a full-scope review. The statewide rating was based on the CRA activity within the El Paso County Metropolitan AA. The time period, products, and affiliates evaluated for this state are consistent with the scope discussed in the Institution section of this report and in Appendix A.

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN TEXAS

WestStar is headquartered in El Paso, Texas, and a substantial majority of its activity is conducted within the state of Texas. The bank operates 13 branches in Texas, representing 93.3 percent of its total branches. As of June 30, 2022, the bank had \$2.5 billion in deposits in Texas, representing 98.0 percent of total deposits. According to the June 30, 2022 Federal Deposit Insurance Corporation (FDIC) Summary of Deposits, the bank had a deposit market share of 0.2 percent and ranked 48th out of 478 FDIC-insured financial institutions across the state. Of the 4,236 small business loans originated and purchased by the bank within its AAs, 4,044 (95.5 percent) were in the Texas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

In Texas, the bank's overall Lending Test performance is Outstanding, consistent with the conclusion reached in the El Paso County Metropolitan AA. The bank's strategic focus is primarily small business lending. During the review period, WestStar originated or purchased 4,044 total small business loans, 18 small farm loans, and 41 HMDA loans. Given the limited volume of HMDA and small farm loans, examiners were not able to conduct a meaningful analysis for this evaluation.

A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for the AA.

Lending Activity

The bank's lending activities in the state of Texas reflect excellent responsiveness to credit needs of its AA. The bank makes use of innovative and/or flexible lending programs to serve credit needs in its AA, including LMI borrowers. During the review period, WestStar demonstrated flexible lending practices through its participation in numerous industry-recognized government-guaranteed lending programs, including, 2,668 loans originated through the SBA's PPP in the state of Texas, 98.8 percent of which were originated in the bank's El Paso County Metropolitan AA.

Geographic Distribution and Distribution by Business Revenue Size

The geographic distribution of loans reflects excellent penetration throughout the state of Texas, consistent with the bank's performance in the El Paso County Metropolitan AA. The bank's borrower lending distribution reflects an excellent penetration among businesses of revenue different sizes.

A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for the AA.

Community Development Lending

In Texas, the bank is a leader in making CD loans. In addition to the CD loans originated within the single Texas AA, the bank also made ten CD loans benefitting a broader state-wide area. In total, the bank originated 112 CD loans totaling \$319.1 million in Texas, as reflected in the table below, representing 88.9 percent of the bank's total CD loans and 88.7 percent by total dollar amount. 10 CD loans in the amount of \$47.6 million were originated outside of the bank's delineated AA and were given consideration as they were responsive to meeting community service needs. The CD loans originated during the evaluation period were for a variety of purposes, as reflected in the following table.

Community Development Lending State of Texas		
Purpose	#	\$(000s)
Affordable Housing	3	2,897
Community Services	17	33,314
Economic Development	11	42,920
Revitalize and Stabilize	81	239,923
Total	112	319,054

The majority of the CD loans in the state of Texas involves efforts to revitalize and stabilize LMI geographies within the AA, including 51 SBA PPP loans totaling \$88.8 million. These loans helped to revitalize and stabilize the bank’s AA during the COVID-19 pandemic and reflect the bank’s commitment to serving the needs of the AA. The bank’s CD lending extended to a broader statewide region, including loans for anchor businesses in LMI geographies that employ and serve residents of the area. Specific details regarding the CD lending can be found in the Conclusions with Respect to Performance Tests section for WestStar’s El Paso County Metropolitan AA.

INVESTMENT TEST

In Texas, the bank’s Investment Test performance is Outstanding. WestStar has an excellent level of qualified CD investments and grants, particularly those not routinely provided by private investors. The volume and amount of these investments and grants often position the bank as a leader. While WestStar makes rare use of innovative and/or complex investments, the bank exhibits good responsiveness to the CD needs of its Texas AA. The majority of the bank’s investments in Texas focus on providing affordable housing; moreover, WestStar engaged in CD investment activity for a variety of purposes, as illustrated in the table below. A large portion of the investments is in mortgage-backed securities, specifically with Government National Mortgage Association (GNMA) securities, and in a municipal bond for the city of Canutillo, Texas, located in El Paso County. Details regarding investments and donations can be found in the Conclusions with Respect to Performance Tests section for the bank’s El Paso County Metropolitan AA.

Investment, Grants, and Donations State of Texas								
Community Development Purpose	Current Investments ¹		Prior Period Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	4	24,218	2	3,931	5	15	11	28,149
Community Services	0	0	2	2,505	268	592	270	3,097
Economic Development	0	0	1	1,335	44	601	45	1,936
Revitalization and Stabilization	0	0	0	0	7	10	7	10
Total	4	24,218	5	7,771	324	1,218	333	33,207
¹ Book value of investment ² Original market value of investment								

SERVICE TEST

The bank’s performance under the Service Test in the state of Texas is High Satisfactory. WestStar performs a variety of services to a large number of organizations across Texas, including serving on the boards of directors for organizations that specifically target their services to LMI individuals and geographies.

Retail Services

Branch locations and alternative delivery systems, such as drive-through facilities, are readily accessible to the bank’s various geographies and to individuals of different income levels. Of the bank’s 13 full-service branches and 13 ATMs in the state of Texas, five branches and six ATMs are located in LMI tracts. Additionally, the bank operates one motor-bank that is also located in a low-

income census tract. The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals.

Products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI individuals or geographies.

Branch and Full-Service ATM Locations State of Texas							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	6.2	3.6	6.9	2	15.4	2	15.4
Moderate	33.5	27.0	26.9	4	30.8	4	30.8
Middle	33.5	34.0	30.7	2	15.4	2	15.4
Upper	26.1	35.4	35.0	5	38.4	5	38.4
Unknown	0.6	0.0	0.5	0	0.0	0	0.0
Total	100.0	100.0	100.0	13	100.0	13	100.0

Note: Percentages may not total precisely due to rounding.

Community Development Services

WestStar is a leader in providing CD services in the state of Texas, consistent with the bank’s performance in its El Paso County Metropolitan AA. Bank employees dedicated approximately 13,454 hours of service during the review period. Despite substantial limitations the COVID-19 pandemic had on in-person services during a large portion of the review period, the bank’s total qualified CD service hours in the state of Texas increased since the previous evaluation. Additionally, several services were provided to qualified organizations outside of the bank’s delineated AAs and were considered as they were responsive to meeting the needs of the community. As outlined in the table below, the largest portion of CD service hours focused on community services targeted to LMI individuals, including bank representatives serving on the board of directors for organizations providing services to LMI individuals and families.

Community Development Services State of Texas			
Purpose	Total Services	Total Hours	Total Organizations
Affordable Housing	0	0	0
Community Services	350	7,793	75
Revitalize/Stabilize	86	744	2
Economic Development	89	4,917	34
Total	525	13,454	111

METROPOLITAN AREAS (Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN EL PASO COUNTY METROPOLITAN ASSESSMENT AREA

The El Paso County Metropolitan AA consists of the entirety of El Paso County in Texas. El Paso County, along with Hudspeth County, which is excluded from the AA, make up the El Paso, TX MSA. Refer to Appendix B for an AA map and Appendix C for additional demographic data.

- According to 2015 American Community Survey (ACS) data, the AA includes 10 low-, 54 moderate-, 54 middle-, 42 upper-income, and one unknown-income census tracts.
- The bank operates 13 branches in the AA, including the main office, representing 93.3 percent of the bank's total branches.
- As of the June 30, 2022, FDIC Market Share Report, the bank held 21.1 percent of the market's deposits, ranking second out of 16 FDIC-insured institutions operating in the AA.
- In 2021, 131 institutions originated or purchased 16,971 CRA-reportable loans in the El Paso County Metropolitan AA. WestStar ranked sixth in the AA, originating 8 percent of the total CRA-reportable loans.
- The substantial majority of the bank's deposits (98.0 percent) and lending activity (95.3 percent) are within the El Paso County Metropolitan AA.
- Information provided by a representative of an area organization that promotes economic development by providing support to small businesses, who indicated the need for more loans and education for start-up and small businesses.

Population Change El Paso County Metropolitan AA			
Area	2015 Population	2020 Population	Percent Change
El Paso County Metropolitan	831,095	865,657	4.2
El Paso, Texas MSA	834,425	868,859	4.1
Texas	26,538,614	29,145,505	9.8
<i>Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census</i>			

- Though the AA population has increased since 2015, the growth rate was less than half of the growth experienced at the statewide level.
- The city of El Paso, Texas is the largest city within the AA, containing approximately 78.5 percent of the total AA population, with no other municipality within the AA containing more than 3.0 percent of the total population.
- LMI census tracts contain approximately 31.2 percent of the AA population and 30.5 percent of AA families.

Median Family Income Change El Paso County Metropolitan AA			
Area	2015 Median Family Income (\$)	2020 Median Family Income (\$)	Percent Change
El Paso County Metropolitan	50,363	54,013	7.2
El Paso, Texas MSA	50,295	53,920	7.2
Texas	68,523	76,073	11.0

Sources: 2011 – 2015 U.S. Census Bureau American Community Survey
2016 – 2020 U.S. Census Bureau American Community Survey
Note: Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

- The median family income in the AA is lower than the median family income for the state of Texas. While the median family income increased since 2015, the increase is not as significant as that of the state of Texas, resulting in LMI families in the AA falling further below the income levels reported statewide.
- Approximately 19.6 percent of the total families domiciled within the AA report annual income levels below the poverty level, which exceeds the statewide rate of 10.7 percent. The largest portion of families below the poverty line (43.0 percent) are domiciled within moderate-income census tracts, with middle-income tracts containing 31.6 percent of families under the poverty line. The volume of families with incomes below the poverty line in the moderate-income census tracts highlights opportunities for CD services in these geographies.

Housing Cost Burden El Paso County Metropolitan AA						
Area	Cost Burden – Renters			Cost Burden – Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
El Paso County Metropolitan	73.0	49.1	43.4	59.1	34.0	22.1
El Paso, Texas MSA	73.0	49.0	43.3	59.0	33.8	22.1
Texas	77.4	42.4	42.4	57.5	30.9	19.2

Cost Burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy

- Of the housing units in the AA, 56.5 percent are owner-occupied, 35.4 percent are rental, and 8.1 percent are vacant. Notably, only 23.6 percent of housing units in low-income census tracts are owner-occupied.
- The housing affordability ratio¹ in the El Paso County Metropolitan AA, at 36.6 percent, is below the statewide ratio of 39.1 percent, indicating that housing is slightly less affordable in the AA than the statewide average.
- The cost burden for LMI individuals is generally higher in the AA than the statewide averages for both renters and owners. This disparity potentially highlights a need for affordable housing in the AA.

¹ The housing affordability ratio is calculated by dividing the median household income by the median housing value. A lower ratio reflects less affordable housing.

Unemployment Rates El Paso County Metropolitan AA					
Area	2017	2018	2019	2020	2021
El Paso County Metropolitan	4.7	4.3	3.8	8.3	6.2
El Paso, Texas MSA	4.7	4.3	3.8	8.3	6.2
Texas	4.3	3.9	3.5	7.7	5.7
<i>Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics</i>					

- The unemployment rates for the AA spiked during 2020, as reflected in the table above. This is primarily attributable to the COVID-19 pandemic that began in March of 2020, and the restrictions put in place to prevent the spread of the virus, such as the executive orders that limit gatherings beginning March 19, 2020, which resulted in some larger businesses downsizing and small businesses closing.
- As shown in the table above, unemployment levels for the AA have declined since the unemployment rate peaked in 2020 due to the COVID-19 pandemic. Additionally, the unemployment rate in the AA remained comparable to the statewide rate throughout the review period.
- El Paso County is home to a variety of industries and businesses, with Fort Bliss and several education systems serving as some of the major employers in the AA.
- A representative of an area organization that promotes economic development stated that small businesses and start-ups in the AA were impacted significantly more by the COVID-19 pandemic than large businesses, with many being forced to shut their doors. Though the area has largely bounced back, the contact highlighted the need for more loans and education for start-up and small businesses.

The following table details selected characteristics of the AA.

2021 El Paso County Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	10	6.2	7,088	3.6	3,599	50.8	43,488	22.3
Moderate	54	33.5	52,571	27.0	16,417	31.2	33,942	17.4
Middle	54	33.5	66,302	34.0	12,063	18.2	37,272	19.1
Upper	42	26.1	69,003	35.4	6,115	8.9	80,262	41.2
Unknown	1	0.6	0	0.0	0	0.0	0	0.0
Total AA	161	100.0	194,964	100.0	38,194	19.6	194,964	100.0
Housing Units by Tract	Housing Type by Tract							
	Owner-occupied			Rental		Vacant		
	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	12,489	2,952	1.8	23.6	7,990	64.0	1,547	12.4
Moderate	78,104	39,452	24.7	50.5	31,449	40.3	7,203	9.2
Middle	96,399	53,077	33.2	55.1	35,828	37.2	7,494	7.8
Upper	95,624	64,166	40.2	67.1	24,698	25.8	6,760	7.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	282,616	159,647	100.0	56.5	99,965	35.4	23,004	8.1
Total Businesses by Tract	Businesses by Tract & Revenue Size							
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	1,950	6.9	1,703	6.5	231	12.5	16	9.2
Moderate	7,561	26.9	6,818	26.1	700	38.0	43	24.9
Middle	8,657	30.7	8,084	30.9	522	28.3	51	29.5
Upper	9,850	35.0	9,433	36.1	357	19.4	60	34.7
Unknown	136	0.5	100	0.4	33	1.8	3	1.7
Total AA	28,154	100.0	26,138	100.0	1,843	100.0	173	100.0
Percentage of Total Businesses:				92.8		6.5		0.6
Total Farms by Tract	Farms by Tract & Revenue Size							
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6	4.2	5	3.6	1	16.7	0	0.0
Moderate	57	39.9	54	39.4	3	50.0	0	0.0
Middle	22	15.4	21	15.3	1	16.7	0	0.0
Upper	57	39.9	57	41.6	0	0.0	0	0.0
Unknown	1	0.7	0	0.0	1	16.7	0	0.0
Total AA	143	100.0	137	100.0	6	100.0	0	0.0
Percentage of Total Farms:				95.8		4.2		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's lending performance under the lending test in the El Paso County Metropolitan AA is excellent. For this evaluation, the bank's performance is based upon its small business lending as no other product had sufficient volume for a meaningful analysis to be conducted. Details of the bank's 2019 small business lending and data regarding aggregate lending performance can be found in Appendix D.

Lending Activity

During the review period, WestStar originated or purchased 4,044 small business loans in the AA and demonstrated flexible lending practices through its participation in numerous industry-recognized government-guaranteed lending programs, including the SBA's PPP. WestStar originated 2,637 PPP loans in the AA in 2020 and 2021, representing 65.2 percent of the bank's small business lending during the review period. The loan products and origination volumes are consistent with the general credit needs of the AA and align with the bank's strategic focus as a commercial lender.

Lending to Businesses of Different Sizes

The borrower distribution of small business loans is adequate considering the bank's performance when compared to the aggregate. During the review period, the bank did not collect revenue information for a significant portion of the small business loans within the El Paso County Metropolitan AA. This skews the analysis as examiners are unable to accurately classify the percentage of small business loans originated to businesses with annual revenues of \$1 million or less for these loans.

Of note, the bank originated 2,587 PPP loans in dollar amounts less than \$1 million within the El Paso County Metropolitan AA in 2020 and 2021. Limited borrower information was collected for these loans due to the program's loan requirements; therefore, reported revenue was not available for most PPP loans. Though this program is not limited to or expressly targeted at small businesses, the bank's participation in the program reflects favorably on the responsiveness to need in the AA.

It is also beneficial to review the bank's small business lending by loan size, as traditionally, smaller businesses are likely to seek loans in smaller amounts. The substantial majority of the bank's small business loans during the review period was made in amounts of \$250,000 or less, with more than half of the originations in amounts of \$100,000 or less. This reflects favorably on the bank's responsiveness of the needs of small businesses in the AA, representing the bank's willingness to make smaller dollar loans.

The bank's lending performance in 2019 reflected penetration levels greater than those of 2020 and 2021. While below the demographic figure in 2019, the bank's distribution of small business loans to businesses with annual revenues of \$1 million or less was greater than aggregate lending performance.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: El Paso County Metropolitan													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	#	#%	#%	\$(000)	%	\$%	
By Revenue													
\$1 Million or Less	242	11.8	37.3	55,001	17.8	28.4	205	15.2	45.0	47,733	23.3	24.3	92.8
Over \$1 Million	238	11.6		84,176	27.2		198	14.7		73,999	36.2		6.5
Revenue Unknown	1,578	76.7		169,745	54.9		944	70.1		82,891	40.5		0.6
Total	2,058	100.0		308,922	100.0		1,347	100.0		204,623	100.0		100.0
By Loan Size													
\$100,000 or Less	1,308	63.6	91.8	50,691	16.4	43.8	885	65.7	94.8	32,129	15.7	45.6	
\$100,001 - \$250,000	392	19.0	5.2	65,877	21.3	20.6	216	16.0	3.3	37,518	18.3	18.4	
\$250,001 - \$1 Million	358	17.4	3.0	192,354	62.3	35.5	246	18.3	1.9	134,976	66.0	36.0	
Total	2,058	100.0	100.0	308,922	100.0	100.0	1,347	100.0	100.0	204,623	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	130	53.7		7,362	13.4		98	47.8		5,887	12.3		
\$100,001 - \$250,000	55	22.7		10,847	19.7		47	22.9		9,582	20.1		
\$250,001 - \$1 Million	57	23.6		36,792	66.9		60	29.3		32,264	67.6		
Total	242	100.0		55,001	100.0		205	100.0		47,733	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Geographic Distribution of Loans

The geographic distribution of small business loans reflects excellent penetration throughout the AA. For this analysis, the geographic distribution of small business lending, including both originations and purchases, was compared with aggregate lending data and available demographic information. The distribution of small business loans in low-income census tracts is greater than both aggregate lending performance and the percentage of total AA businesses located in low-income census tracts (the demographic figure). Despite the number of small businesses located in moderate-income census tracts, at 26.9 percent, is three times larger than the number of small businesses in low-income geographies, the bank's performance outperforming aggregate lending and the demographic figure by a larger margin. The distribution of the bank's lending in middle- and upper-income geographies did not affect conclusions about the bank's performance considering its lending in LMI geographies.

The bank's lending performance in 2019 reflected penetration levels that were consistent with 2020 and 2021.

Furthermore, the bank's loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: El Paso County Metropolitan													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
Low	204	9.9	6.1	32,769	10.6	6.4	128	9.5	5.8	21,753	10.6	7.4	6.9
Moderate	705	34.3	27.9	128,311	41.5	28.3	426	31.6	26.9	76,913	37.6	26.5	26.9
Middle	526	25.6	29.8	67,483	21.8	31.9	335	24.9	29.1	42,037	20.5	32.0	30.7
Upper	614	29.8	35.3	78,942	25.6	31.8	452	33.6	37.3	62,784	30.7	32.7	35.0
Unknown	9	0.4	0.4	1,417	0.5	0.7	6	0.4	0.4	1,136	0.6	1.2	0.5
Total	2,058	100.0	100.0	308,922	100.0	100.0	1,347	100.0	100.0	204,623	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

WestStar is a leader in making CD loans in the AA. The bank originated 102 CD loans in the El Paso County Metropolitan AA, totaling over \$271,389 million during the review period. The table below reflects the composition of CD loans and highlights the various CD purpose of the bank's qualified lending. The number and dollar amount of CD loans increased by approximately 92.4 percent and 60.4 percent, respectively, since the prior evaluation period.

Community Development Lending El Paso County Metropolitan AA		
Purpose	#	\$(000s)
Affordable Housing	3	2,897
Community Services	17	33,314
Economic Development	11	42,920
Revitalization and Stabilization	71	192,258
Total	102	271,389

The majority of the CD loans involves efforts to revitalize and stabilize geographies within the AA, including 50 PPP loans totaling \$87.4 million. The PPP was implemented under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) with the express purpose to help businesses keep their workforce employed during the COVID-19 pandemic; as such, these loans helped to revitalize and stabilize the bank's AA during the pandemic and reflect the bank's commitment to serving the needs of the AA. Other examples of CD loans made by the bank during the review period are a \$31.3 million loan for the construction of a building downtown in accordance with an approved city plan for the revitalization of Downtown El Paso and a \$1.7 million loan for a 48-unit affordable housing project located in a moderate-income geography.

INVESTMENT TEST

WestStar’s performance under the Investment Test in the El Paso County Metropolitan AA is excellent. The excellent level of qualified CD investments and grants often places the bank in a leadership position. The bank’s investments primarily focus on affordable housing through CRA-targeted mortgage-backed securities (MBS). Other CD investments include municipal bonds providing support for school districts at which the majority of students qualify for free or reduced-price lunches and a \$1.3 million investment in a small business investment company.

Investment, Grants, and Donations El Paso County Metropolitan AA								
Community Development Purpose	Current Investments ¹		Prior Period Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	4	24,218	2	3,931	5	15	11	28,164
Community Services	0	0	2	2,505	268	592	270	3,097
Economic Development	0	0	1	1,335	46	601	47	1,936
Revitalization and Stabilization	0	0	0	0	7	10	7	10
Total	4	24,218	5	7,771	326	1,218	335	33,192
¹ Book value of investment								
² Original market value of investment								

For the current period, the bank acquired four affordable housing investments with the purpose of financing affordable multi-family properties within the AA. WestStar’s total CD investments represents a 12.8 percent increase by number volume and almost tripled by dollar volume since the previous evaluation. The largest increase in CD investment activity is seen in the bank’s affordable housing investments, which increased by 447.4 percent over the previous evaluation.

SERVICE TEST

WestStar’s Service Test performance in the El Paso Metropolitan AA is good. Retail services are well distributed throughout the AA to properly reach the communities. Additionally, the bank provides a relatively high level of CD services. Bank officers and employees actively support organizations dedicated to CD initiatives.

Retail Services

Branch locations and alternative delivery systems, including drive-through facilities, are readily accessible to the bank’s various geographies and to individuals of different income levels in the AA. As displayed in the table below, the bank operates 13 full-service branches and one motor-bank location, as well as 14 ATMs in the AA, with five branches and six ATMs located in LMI census tracts. The portion of the bank’s branches in LMI tracts is greater than the percent of the AA population or AA businesses located in these tracts.

The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals. The bank relocated four locations during the review period. The bank’s main office and downtown motor bank relocated within the same census tract, and the other two locations moved to different census tracts with the same income level designation.

Products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank’s hours of operation and product and service offerings are consistent throughout the AA, with extended drive-through hours at all bank locations.

Branch and Full-Service ATM Locations El Paso County Metropolitan AA							
Tract Income	% of Geographies	% of Population	% of Businesses	Branches		Full-Service ATMs	
				#	%	#	%
Low	6.2	3.6	6.9	2	15.4	2	15.4
Moderate	33.5	27.0	26.9	4	30.8	4	30.8
Middle	33.5	34.0	30.7	2	15.4	2	15.4
Upper	26.1	35.4	35.0	5	38.4	5	38.4
Unknown	0.6	0.0	0.5	0	0.0	0	0.0
Total	100.0	100.0	100.0	13	100.0	13	100.0

Note: Percentages may not total precisely due to rounding.

Community Development Services

WestStar is a leader in providing CD services in the AA. Bank employees served in various capacities, including boards of directors and as trustees, for 104 organizations offering CD services that aided LMI individuals. The bank’s level of CD services increased moderately since the previous evaluation, with total CD service hours increasing by 38.4 percent in the El Paso County Metropolitan AA. Examples of services provided include leadership roles with:

- El Pasoans Fighting Hunger, an organization providing nutritious food to LMI individuals and families in the AA;
- El Paso Child Guidance Center, an area organization that provides care to children who are victims to abuse; and
- El Paso Apartment Association, providing for the housing needs of LMI individuals and families in the AA.

As shown on the following table, WestStar extended various CD services for a total of approximately 13,454 hours served during the review period.

Community Development Services El Paso County Metropolitan AA			
Purpose	Total Services	Total Hours	Total Organizations
Affordable Housing	0	0	0
Community Services	350	7,793	74
Revitalize/Stabilize	86	744	2
Economic Development	89	4,917	28
Total	525	13,454	104

STATE OF NEW MEXICO

CRA RATING FOR NEW MEXICO: SATISFACTORY

The Lending Test is Rated: High Satisfactory
The Investment Test is Rated: High Satisfactory
The Service Test is Rated: Low Satisfactory

MAJOR FACTORS SUPPORTING THE INSTITUTION'S RATING FOR NEW MEXICO

- Lending activity reflects good responsiveness to the AA's credit needs.
- The geographic distribution of loans reflects good penetration throughout the AA.
- The distribution of the bank's small business lending reflects adequate penetration among businesses of different revenue sizes.
- A good record of servicing the credit needs of low-income areas and very small businesses.
- WestStar makes a relatively high level of CD loans.
- The bank makes use of innovative and/or flexible lending practices in serving AA's needs.
- WestStar has a significant level of qualified CD investments and grants, particularly those not routinely provided by private investors and is occasionally in a leadership position.
- While the bank makes rare use of innovative and/or complex investments to support CD initiatives, WestStar exhibits good responsiveness to credit and CD needs.
- Delivery systems are accessible to the bank's geographies and individuals of different income levels in the AAs.
- The record of opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly LMI geographies and/or LMI individuals.
- The bank provides a relatively high level of CD services.

SCOPE OF THE EVALUATION

The bank delineates a single AA in New Mexico - Las Cruces, NM MSA AA. Therefore, the AA received a full-scope review, and the statewide rating is based on the CRA performance in the sole AA. The time period, products, and affiliates evaluated for this state are consistent with the scope discussed in the Institution section of this report (see also Appendix A).

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN NEW MEXICO

The bank operates a branch office in its New Mexico AA, representing 6.7 percent of total branches. As of December 31, 2022, the bank held \$50.5 million in deposits in the state, representing 2.0 percent of the bank's total deposits. According to the June 30, 2022 FDIC Summary of Deposits, the bank had a deposit market share of 0.1 percent and ranked 52nd out of 56 total FDIC-insured financial institutions across the state. Of the 4,236 small business loans originated and purchased by the bank within its AAs, 192 (4.5 percent) were in New Mexico.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW MEXICO

LENDING TEST

In New Mexico, the bank’s overall Lending Test rating is High Satisfactory, consistent with the Lending Test conclusion for the Las Cruces, NM MSA AA. The bank is primarily a small business lender. While the bank also makes HMDA and small farm loans; however, the minimal volume of originations and purchases precludes examiners from conducting a meaningful analysis in evaluating the bank’s CRA performance.

A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for the Las Cruces, NM MSA AA.

Lending Activity

The bank’s lending activities in the state of New Mexico reflect good responsiveness to the credit needs of its AA. WestStar makes use of innovative and/or flexible lending programs to serve credit needs in its AA. During the review period, the bank demonstrated flexible lending practices through its participation in numerous industry-recognized government-guaranteed lending programs, including, 121 loans originated through the SBA’s PPP in the state of New Mexico, 83.5 percent of which were originated in the bank’s Las Cruces, NM MSA AA.

For this evaluation, the total loans in the state included 192 small business loans, nine small farm loans, and two home mortgages originated during the three-year period between January 1, 2019, and December 31, 2021. This is reflective of the bank’s activity in the Las Cruces, NM MSA AA.

Geographic Distribution and Distribution by Business Revenue Size

The geographic distribution of loans reflects good penetration throughout the state of New Mexico, consistent with the bank’s performance in the Las Cruces, NM MSA AA. The bank’s borrower distribution reflects an adequate penetration among businesses of different revenue sizes. A detailed discussion of the facts and data supporting the overall conclusions are presented in the Conclusions with Respect to Performance Criteria section for the AA.

Community Development Lending

In New Mexico, the bank makes a relatively high level of CD loans. In addition to the CD loans originated within the bank’s single New Mexico AA, WestStar made four CD loans, totaling \$25.5 million, benefitting a broader state-wide area. In total, the bank originated 12 CD loans for \$37.4 million in New Mexico, representing 9.5 percent of the bank’s total number of CD loans and 10.4 of the total dollar amount. The CD loans originated during the evaluation period were for a variety of purposes, as reflected in the table below.

Community Development Lending State of New Mexico		
Purpose	#	\$(000s)
Affordable Housing	1	333
Community Services	0	0
Economic Development	0	0
Revitalize and Stabilize	11	37,069
Total	12	37,402

The majority of the CD loans in the state of New Mexico involves efforts to revitalize and stabilize geographies the AA, including eight PPP loans totaling \$11.8 million. The SBA PPP's loans helped to revitalize and stabilize the bank's AA during the COVID-19 pandemic, reflect the bank's commitment to serving the needs of the AA.

Specific details regarding the CD lending can be found in the Conclusions with Respect to Performance Tests section for the bank's Las Cruces, NM MSA AA.

INVESTMENT TEST

In New Mexico, the bank's overall Investment Test rating is High Satisfactory, consistent with the Investment Test conclusion for the Las Cruces, NM MSA AA. WestStar has a significant level of qualified CD investments and grants, particularly those not routinely provided by private investors. The volume and amount of these investments and grants occasionally positions the bank as a leader. While WestStar makes rare use of innovative and/or complex investments, the bank exhibits good responsiveness to the CD needs of its one New Mexico AA.

The bank's investments in New Mexico focused entirely on affordable housing through a CRA-targeted MBS and a CRA-targeted fund for the financing of affordable multi-family properties in the state. In addition, WestStar made 17 donations that totaled over \$20 thousand to organizations providing community services targeted to LMI individuals in New Mexico.

Details regarding investments and donations can be found in the Conclusions with Respect to Performance Tests section for the bank's Las Cruces, NM MSA AA.

SERVICE TEST

In New Mexico, the bank's overall service test rating is Low Satisfactory, consistent with the service test conclusion for the Las Cruces, NM MSA AA. Retail services effectively serve the communities in the AA. Additionally, the bank provides a relatively high level of CD services. Bank officers and employees actively support organizations dedicated to CD initiatives. Specific details of the service performance are noted in the Conclusions with Respect to Performance Tests section for the bank's Las Cruces, NM MSA AA.

Retail Services

WestStar's branch location and alternative delivery systems, such as drive-through facility and full-service ATM, are accessible to the bank's various geographies and to individuals of different income levels. The bank operates one full-service branch in the state. Though the branch is located in a middle-income census tract, it is in close proximity to, and reasonably serves, several LMI census tracts. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in LMI areas or to LMI individuals, as WestStar has not opened or closed any branches in New Mexico since the previous evaluation.

Community Development Services

The bank provides a relatively high level of CD services within its single AA in the state of New Mexico. Bank employees served in numerous CD organizations in various capacities, totaling

approximately 724 hours during the review period. Despite the substantial limitations the COVID-19 pandemic had on in-person services during a large portion of the review period, the bank's total qualified CD service hours in the state of New Mexico increased since the previous evaluation. The largest portion of CD service hours in the state focused on community services targeted to LMI individuals, including bank representatives serving as directors or trustees for organizations providing services to LMI youth, as well as organizations committed to providing tools and resources to help local small businesses succeed.

Details regarding the bank's CD service performance can be found in the Conclusions with Respect to Performance Tests section for the bank's Las Cruces, NM MSA AA.

METROPOLITAN AREAS (Full-Scope Review)

DESCRIPTION OF THE INSTITUTION'S OPERATIONS IN LAS CRUCES, NM MSA ASSESSMENT AREA

The Las Cruces, NM MSA AA consists of the entirety of the Las Cruces, NM MSA, as the MSA is a single-county MSA comprised by the Dona Ana County. The AA is located in southern New Mexico along the border of Texas and the United States-Mexico border. See Appendix B for an AA map and Appendix C for additional demographic data.

- According to 2015 ACS data, the AA includes three low-, 16 moderate-, 13 middle-, and nine upper-income census tracts.
- The bank's sole branch in this AA is located in a middle-income census tract and represents 6.7 percent of WestStar's total branches.
- As of June 30, 2022, FDIC Market Share Report, the bank held 1.6 percent of the market's deposits, ranking 14th out of 18 FDIC-insured depository institutions in the AA.
- In 2021, 79 institutions originated or purchased 3,275 CRA-reportable loans in the AA. The bank originated 56 CRA-reportable loans, or 1.7 percent, ranking 13th in the AA.
- A representative of an area organization that promotes economic development by providing support to small businesses expressed that while small business loans seem available, small business owners need increased education to help their businesses grow and succeed.

Population Change Las Cruces, NM MSA AA			
Area	2015 Population	2020 Population	Percent Change
Las Cruces NM MSA	213,963	219,561	2.6
New Mexico	2,084,117	2,117,522	1.6
<i>Source: 2011-2015 U.S. Census Bureau American Community Survey 2020 U.S. Census Bureau Decennial Census</i>			

- The city of Las Cruces, NM is the largest city within the AA, containing approximately 51.4 percent of the total AA population, with no other municipality within the AA containing more than 7.5 percent of the total population.
- The Las Cruces, NM MSA AA accounts for 10.4 percent of the state of New Mexico's population.
- LMI census tracts contain approximately 43.8 percent and 40.9 percent of the total AA population and AA families, respectively.
- The population of both the AA and the state have slightly increased since 2015, as shown in the table above.

Median Family Income Change Las Cruces, NM MSA AA			
Area	2015 Median Family Income (\$)	2020 Median Family Income (\$)	Percent Change
Las Cruces NM MSA	49,214	51,928	5.5
New Mexico	60,145	62,611	4.1
<i>Source: 2011 - 2015 U.S. Census Bureau American Community Survey 2016 - 2020 U.S. Census Bureau American Community Survey Note: Median family incomes have been inflation-adjusted and are expressed in 2020 dollars.</i>			

- The AA families living below the poverty level in 2021, at 21.8 percent, is above the 18.3 percent statewide figure for New Mexico.
- The median family income in the AA is lower than the median family income for the state of New Mexico. The median family income increased at a greater rate than the median family income for the state of New Mexico, though income levels in the AA remain more than 15 percent below the statewide figure.

Housing Cost Burden Las Cruces, NM MSA AA						
Area	Cost Burden - Renters			Cost Burden - Owners		
	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners
Las Cruces NM MSA	71.6	40.8	44.7	51.5	32.0	20.1
New Mexico	71.1	44.3	41.4	53.3	30.3	19.7

*Cost burden is housing cost that equals 30 percent or more of household income.
Source: U.S. Department of Housing and Urban Development (HUD), 2015-2019 Comprehensive Housing Affordability Strategy*

- Of the housing units in the AA, 58.0 percent are owner-occupied, 31.5 percent are rental, and 10.6 percent are vacant. Notably, only 29.8 percent of housing units in low-income census tracts are owner-occupied.
- The AA housing affordability ratio, at 28.2 percent, is comparable to the 28.1 percent statewide ratio, indicating that housing affordability is similar to the statewide average.
- The cost burden for LMI individuals in the AA is similar to the statewide averages for both renters and owners.

Unemployment Rates Las Cruces, NM MSA AA					
Area	2017	2018	2019	2020	2021
Las Cruces NM MSA	6.7	5.6	5.8	8.0	6.6
New Mexico	6.1	4.9	4.9	8.1	6.8

Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics

- The increase in unemployment during 2020, reflected in the table above, is attributable to the COVID-19 pandemic that began in March of 2020, and the restrictions put in place to prevent contagion. Unemployment levels for the AA and the state have declined since they peaked in 2020. Moreover, the AA unemployment rates have remained comparable to the statewide rate throughout the review period.
- A representative of an area organization that promotes economic development stated that the AA is recovering well from the COVID-19 pandemic; however, partnering with small businesses is a continued need. According to the contact, while small business loans seem available, small business owners need increased education to help their businesses grow and succeed.

The following table details selected characteristics of the AA.

2021 Las Cruces NM MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	7.3	3,021	5.8	1,484	49.1	12,988	25.1
Moderate	16	39.0	18,140	35.0	5,650	31.1	8,056	15.6
Middle	13	31.7	13,787	26.6	2,889	21.0	8,767	16.9
Upper	9	22.0	16,833	32.5	1,435	8.5	21,970	42.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	41	100.0	51,781	100.0	11,458	22.1	51,781	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,924	1,768	3.6	29.8	3,551	59.9	605	10.2
Moderate	27,608	16,708	34.5	60.5	7,795	28.2	3,105	11.2
Middle	22,506	11,995	24.8	53.3	8,280	36.8	2,231	9.9
Upper	27,548	17,974	37.1	65.2	6,691	24.3	2,883	10.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	83,586	48,445	100.0	58.0	26,317	31.5	8,824	10.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	417	6.8	379	6.6	35	8.4	3	5.6
Moderate	2,106	34.1	1,905	33.4	185	44.5	16	29.6
Middle	1,529	24.8	1,423	25.0	90	21.6	16	29.6
Upper	2,120	34.3	1,995	35.0	106	25.5	19	35.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6,172	100.0	5,702	100.0	416	100.0	54	100.0
Percentage of Total Businesses:				92.4		6.7		0.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4	2.0	4	2.2	0	0.0	0	0.0
Moderate	75	36.8	61	33.3	14	66.7	0	0.0
Middle	56	27.5	55	30.1	1	4.8	0	0.0
Upper	69	33.8	63	34.4	6	28.6	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	204	100.0	183	100.0	21	100.0	0	0.0
Percentage of Total Farms:				89.7		10.3		0.0
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

WestStar's lending performance under the Lending Test in the Las Cruces, NM MSA AA is good. For this evaluation, the bank's performance is based entirely on its small business lending as no other product had sufficient volume for a meaningful analysis to be conducted. Details of the bank's 2019 small business lending and data regarding aggregate lending performance can be found in Appendix D.

Lending Activity

The bank's lending activity reflects good responsiveness to AA credit needs. WestStar makes use of innovative and/or flexible lending programs to serve AA credit needs, including LMI borrowers and communities. During the review period, the bank demonstrated flexible lending practices through its participation in numerous industry-recognized government-guaranteed lending programs, including the origination of 101 PPP loans, totaling more than \$22 million, in the AA.

For this evaluation, the total loans in the AA included 192 small business loans, nine small farm loans, and two home mortgages originated during the three-year period between January 1, 2019, and December 31, 2021. As previously noted, the minimal volume of small farm and HMDA loans prevent examiners from conducting a meaningful analysis; hence, they were not considered when evaluating WestStar's CRA performance. The loan activity is consistent with the general credit needs of the AA, the bank's presence in the AA, and WestStar's strategic focus as a commercial lender.

Lending to Businesses of Different Sizes

The bank's borrower distribution of loans reflects an adequate penetration among businesses of different revenue sizes when compared to aggregate lenders. WestStar did not collect revenue information for a substantial portion of the small business loans within the Las Cruces, NM MSA AA during this review period, impacting the percentage of small business loans originated to businesses with annual revenues of \$1 million or less. Less than 30 percent of the loans had reported revenue information; however, more than half of the loans for which revenue was reported were originated to borrowers with annual revenues of \$1 million or less.

Of note, the bank originated 94 PPP loans in dollar amounts less than \$1 million within the Las Cruces, NM MSA AA in 2020 and 2021. Limited borrower information was collected for these loans due to the program's loan requirements; therefore, reported revenue was not available for most PPP loans. Though this program is not limited to or expressly targeted at small businesses, the bank's participation in the program reflects favorably on the responsiveness to AA needs.

It is also beneficial to review the bank's small business lending by loan size, as traditionally, smaller businesses are likely to seek loans in smaller amounts. The majority of the bank's small business loans during the review period were made in amounts of \$100,000 or less and more than 80 percent of the loans were made in amounts of \$250,000 or less. This reflects favorably on WestStar's responsiveness of the needs of small businesses in the AA, representing the bank's willingness to make smaller dollar loans.

The bank's lending performance in 2019 reflected penetration levels greater than those of 2020 and 2021. While below the demographic figure in 2019, the bank's distribution of small business loans

to businesses with annual revenues of \$1 million or less was greater than aggregate lending performance.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Las Cruces NM MSA													
	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	#	%	%	\$(000)	%	%	
By Revenue													
\$1 Million or Less	15	15.8	41.0	3,038	20.9	29.5	16	30.2	49.5	4,452	42.4	26.8	92.4
Over \$1 Million	13	13.7		3,137	21.6		6	11.3		2,255	21.5		6.7
Revenue Unknown	67	70.5		8,356	57.5		31	58.5		3,787	36.1		0.9
Total	95	100.0		14,531	100.0		53	100.0		10,494	100.0		100.0
By Loan Size													
\$100,000 or Less	57	60.0	95.0	2,268	15.6	54.2	33	62.3	96.2	1,312	12.5	49.3	
\$100,001 - \$250,000	22	23.2	3.3	3,970	27.3	17.7	7	13.2	2.2	1,178	11.2	15.8	
\$250,001 - \$1 Million	16	16.8	1.7	8,293	57.1	28.2	13	24.5	1.6	8,004	76.3	34.9	
Total	95	100.0	100.0	14,531	100.0	100.0	53	100.0	100.0	10,494	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	8	53.3		450	14.8		9	56.3		524	11.8		
\$100,001 - \$250,000	4	26.7		748	24.6		3	18.8		461	10.4		
\$250,001 - \$1 Million	3	20.0		1,840	60.6		4	25.0		3,467	77.9		
Total	15	100.0		3,038	100.0		16	100.0		4,452	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

Geographic Distribution of Loans

The geographic distribution of lending reflects good penetration throughout the AA. For this analysis, the geographic distribution of small business lending, including both originations and purchases, was compared with aggregate lending data and available demographic information. The distribution of the bank’s lending in middle- and upper-income geographies did not affect conclusions about the bank’s performance considering its lending in LMI geographies.

The geographic distribution of small business loans reflects good penetration throughout the AA. The distribution of 2020 small business loans in low-income census tracts is comparable to the percentage of total AA businesses located in low-income census tracts (the demographic figure) and the performance of aggregate lenders in the AA. In 2021, the bank’s performance in low-income census tracts is similar to its 2020 performance, though it improved slightly when compared to the performance of aggregate lenders.

The distribution of the bank’s small business loans in moderate-income tracts in 2020 was slightly above the demographic figure and the aggregate performance. In 2021, the bank’s performance

was comparable to aggregate lending and the demographic figure. As there are significantly more moderate-income census tracts in the AA, the bank’s performance in these tracts was given slightly more weight in determining the banks level of performance.

The bank’s lending performance in 2019 reflected penetration levels that were consistent with 2020 and 2021. Furthermore, the bank’s loan dispersion among geographies of different income levels did not reveal any notable gaps or lapses.

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Las Cruces NM MSA													
Geographic Income Level	Bank And Aggregate Loans By Year												Total Businesses %
	2020						2021						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
Low	5	5.3	5.2	1,245	8.6	5.3	3	5.7	4.3	1,550	14.8	4.6	6.8
Moderate	36	37.9	34.7	5,666	39.0	36.8	17	32.1	33.5	2,019	19.2	32.5	34.1
Middle	29	30.5	25.1	5,100	35.1	25.6	18	34.0	25.2	4,922	46.9	21.9	24.8
Upper	25	26.3	32.3	2,520	17.3	28.7	15	28.3	33.9	2,003	19.1	39.6	34.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	95	100.0	100.0	14,531	100.0	100.0	53	100.0	100.0	10,494	100.0	100.0	100.0

Source: 2021 FFIEC Census Data
2021 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Community Development Lending

WestStar makes a relatively high level of CD loans in the AA. During the review period, the bank originated eight CD loans in the Las Cruces, NM MSA AA, totaling \$11.8 million. The bank made a CD loan for the purchase of a 22-unit affordable housing apartment complex in a moderate-income geography within the AA. Additionally, the bank participated in the SBA’s PPP, as implemented under the CARES Act, with the expressed purpose to help businesses keep their workforce employed during the COVID-19 pandemic. The bank originated six PPP loans in the Las Cruces, NM MSA AA for a total of \$9.4 million. These loans helped to revitalize and stabilize the bank’s AA during the pandemic, reflecting WestStar’s commitment to serving the AA needs.

Community Development Lending		
Assessment Area: Las Cruces, NM MSA		
Purpose	#	\$(000s)
Affordable Housing	1	333
Community Services	0	0
Economic Development	0	0
Revitalization and Stabilization	7	11,481
Total	8	11,814

INVESTMENT TEST

The bank’s performance under the Investment Test in the Las Cruces, NM MSA AA is good. The bank has a significant level of qualified CD investments and grants, particularly those not routinely provided by private investors, occasionally putting WestStar in a leadership position. The bank’s investments primarily focused on affordable housing through CRA-targeted MBS and fund for the financing of affordable multi-family properties.

Investment, Grants, and Donations Las Cruces, NM MSA AA								
Community Development Purpose	Prior Period Investments ¹		Current Investments ²		Donations		Total	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Affordable Housing	1	2,219	1	5,079	0	0	2	7,298
Community Services	0	0	0	0	17	20	17	20
Economic Development	0	0	0	0	1	1	1	1
Revitalization and Stabilization	0	0	0	0	0	0	0	0
Total	1	2,219	1	5,079	18	21	20	7,319
¹ Book value of investment ² Original market value of investment								

In addition to the qualified investments, the bank donated approximately \$21 thousand to organizations providing community services targeted to LMI individuals, including large donations to youth programs targeted to LMI families as well as an organization that provides clothing and other essentials to low-income families in the AA.

SERVICE TEST

The bank’s Service Test performance in the Las Cruces, NM MSA AA is good. Retail services effectively serve the communities in the AA. Additionally, WestStar provides a relatively high level of CD services. Bank officers and employees actively support organizations dedicated to CD initiatives in the AA.

Retail Services

WestStar’s sole branch location and alternative delivery systems, including drive-through facility, are accessible to the various geographies and to individuals of different income levels in the AA. The bank operates a full-service office in the AA that includes a full-service ATM. Though the bank’s branch is in a middle-income census tract, it is in close proximity to several moderate-income census tracts and all but one of the AA’s low-income census tracts. Additionally, the only low-income census tract in the AA that is not in proximity to WestStar’s Las Cruces Branch is reasonably served by the bank’s branches located in the El Paso Metropolitan AA, as the contiguous AAs are only separated by the Texas-New Mexico border.

The bank has not opened or closed any branches in the Las Cruces, NM MSA AA since the previous evaluation. WestStar’s products, services, and business hours do not vary in a way that inconveniences its AA, particularly LMI geographies and/or LMI individuals. The bank’s hours of operation and product and service offerings at the single AA branch are consistent those of all bank branches, with extended drive-through hours at all bank locations.

Community Development Services

WestStar provides an adequate level of CD services in the AA. Bank employees served as directors and trustees for eight organizations offering CD services that aided LMI individuals. The bank's level of CD services increased slightly since the previous evaluation, with total CD service hours increasing by 9.5 percent in the Las Cruces, NM MSA AA.

Examples of services provided include a bank representative serving as a board member with the Boys and Girls Clubs of Las Cruces and the Mesilla Valley Economic Development Alliance, which provide after-school care for children primarily from LMI families in the AA and tools and resources to help local small businesses succeed, respectively. The table below shows the number of hours by type of involvement.

Community Development Services Las Cruces, NM MSA AA			
Purpose	Total Services	Total Hours	Total Organizations
Affordable Housing	0	0	0
Community Services	149	650	6
Revitalize/Stabilize	0	0	0
Economic Development	4	74	2
Total	153	724	8

APPENDICES

Appendix A – Scope of Examination

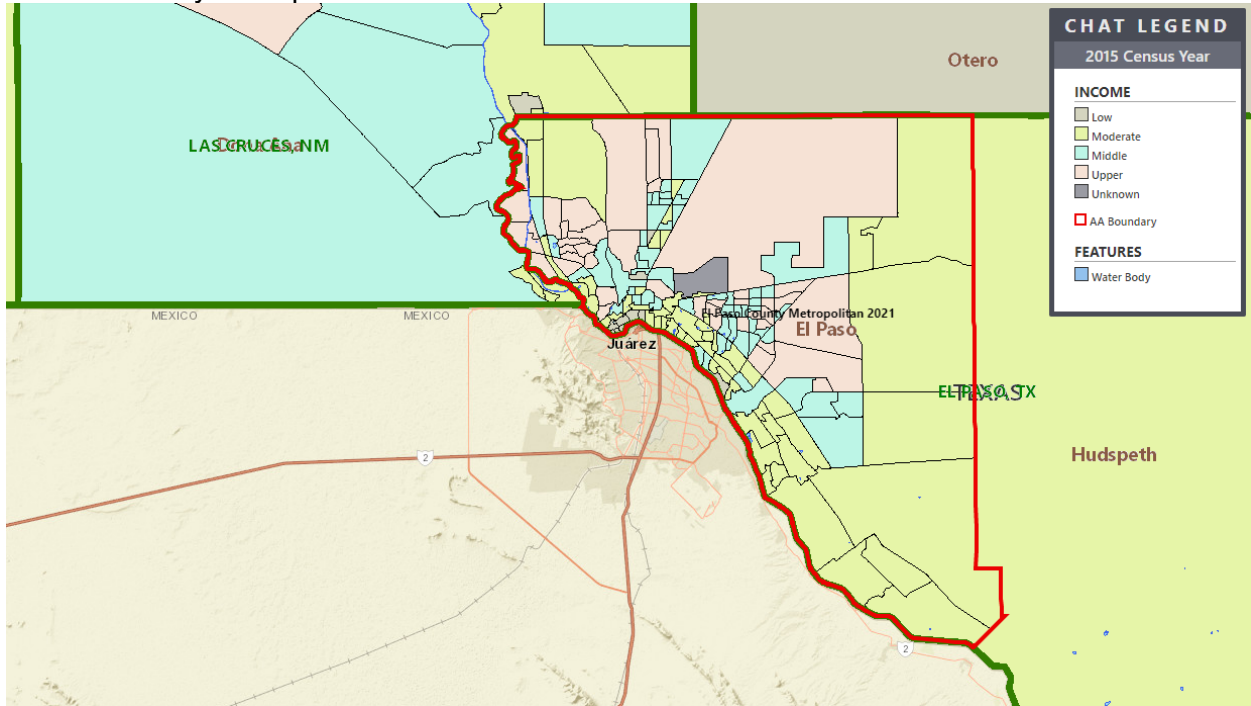
SCOPE OF EXAMINATION			
Time Period Reviewed			
Lending Test: January 1, 2019 to December 31, 2021			
Community Development Loans, Investments, and Services: February 24, 2020 to March 20, 2023			
Financial Institution		Products Reviewed	
WestStar Bank El Paso, Texas		CRA reportable loans Community development loans	
AFF/AFFS		Affiliate Relationship	Products Reviewed
WestStar Insurance Agency, INC		Subsidiary	None
WestStar Title, LLC		Subsidiary	None
WestStar Tower, LLC		Subsidiary	None
List of Assessment Areas			
Assessment Area	Type of Examination	Branches Visited	Other Information
El Paso County Metropolitan	Full-Scope	0	Small business loans
Las Cruces, NM MSA	Full-Scope	0	Small business loans

Note: Branches Visited indicates where technical compliance with the CRA (signs, public file, etc.) was confirmed. The evaluation of the institution’s CRA performance takes into consideration activity from all branch locations, as described in the Scope of Examination.

Appendix B – Assessment Area Maps

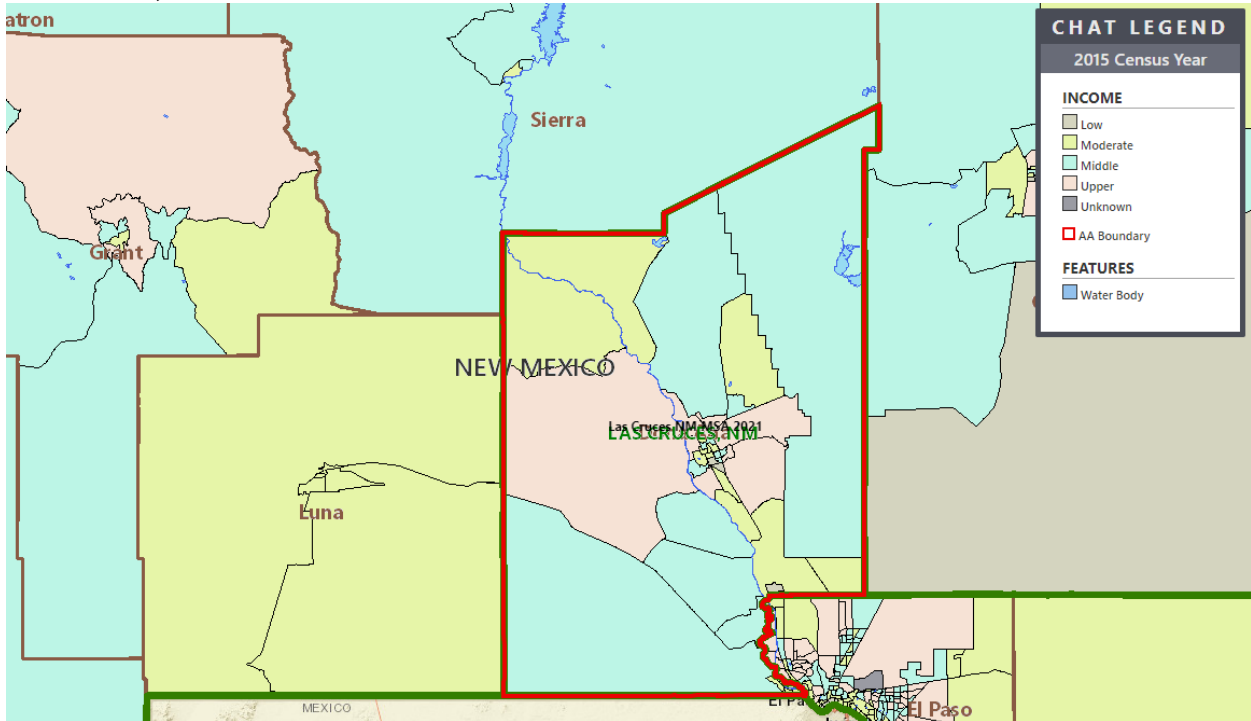
Texas

El Paso County Metropolitan



New Mexico

Las Cruces, NM MSA



Appendix C – Metropolitan Full-Scope Assessment Areas Demographics

State of Texas - El Paso County Metropolitan AA

Table C-1

2020 El Paso County Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	10	6.2	7,088	3.6	3,599	50.8	43,488	22.3
Moderate	54	33.5	52,571	27.0	16,417	31.2	33,942	17.4
Middle	54	33.5	66,302	34.0	12,063	18.2	37,272	19.1
Upper	42	26.1	69,003	35.4	6,115	8.9	80,262	41.2
Unknown	1	0.6	0	0.0	0	0.0	0	0.0
Total AA	161	100.0	194,964	100.0	38,194	19.6	194,964	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	12,489	2,952	1.8	23.6	7,990	64.0	1,547	12.4
Moderate	78,104	39,452	24.7	50.5	31,449	40.3	7,203	9.2
Middle	96,399	53,077	33.2	55.1	35,828	37.2	7,494	7.8
Upper	95,624	64,166	40.2	67.1	24,698	25.8	6,760	7.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	282,616	159,647	100.0	56.5	99,965	35.4	23,004	8.1
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	1,951	7.0	1,697	6.5	239	12.6	15	9.6
Moderate	7,565	27.0	6,809	26.2	718	37.9	38	24.2
Middle	8,628	30.8	8,034	30.9	547	28.9	47	29.9
Upper	9,747	34.8	9,333	35.9	359	18.9	55	35.0
Unknown	136	0.5	102	0.4	32	1.7	2	1.3
Total AA	28,027	100.0	25,975	100.0	1,895	100.0	157	100.0
Percentage of Total Businesses:				92.7		6.8		0.6
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	5	3.4	4	2.8	1	14.3	0	0.0
Moderate	59	39.6	55	38.7	4	57.1	0	0.0
Middle	23	15.4	22	15.5	1	14.3	0	0.0
Upper	61	40.9	61	43.0	0	0.0	0	0.0
Unknown	1	0.7	0	0.0	1	14.3	0	0.0
Total AA	149	100.0	142	100.0	7	100.0	0	0.0
Percentage of Total Farms:				95.3		4.7		0.0
Source: 2020 FFIEC Census Data 2020 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Table C-2

2019 El Paso County Metropolitan AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	10	6.2	7,088	3.6	3,599	50.8	43,488	22.3
Moderate	54	33.5	52,571	27.0	16,417	31.2	33,942	17.4
Middle	54	33.5	66,302	34.0	12,063	18.2	37,272	19.1
Upper	42	26.1	69,003	35.4	6,115	8.9	80,262	41.2
Unknown	1	0.6	0	0.0	0	0.0	0	0.0
Total AA	161	100.0	194,964	100.0	38,194	19.6	194,964	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	12,489	2,952	1.8	23.6	7,990	64.0	1,547	12.4
Moderate	78,104	39,452	24.7	50.5	31,449	40.3	7,203	9.2
Middle	96,399	53,077	33.2	55.1	35,828	37.2	7,494	7.8
Upper	95,624	64,166	40.2	67.1	24,698	25.8	6,760	7.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	282,616	159,647	100.0	56.5	99,965	35.4	23,004	8.1
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	1,928	7.0	1,686	6.7	227	11.8	15	9.6
Moderate	7,437	27.1	6,661	26.3	732	37.9	44	28.0
Middle	8,434	30.8	7,833	30.9	563	29.2	38	24.2
Upper	9,484	34.6	9,046	35.7	380	19.7	58	36.9
Unknown	122	0.4	92	0.4	28	1.5	2	1.3
Total AA	27,405	100.0	25,318	100.0	1,930	100.0	157	100.0
Percentage of Total Businesses:				92.4		7.0		0.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
			#	%	#	%	#	%
Low	4	2.6	3	2.1	1	12.5	0	0.0
Moderate	62	40.5	58	40.0	4	50.0	0	0.0
Middle	23	15.0	21	14.5	2	25.0	0	0.0
Upper	63	41.2	63	43.4	0	0.0	0	0.0
Unknown	1	0.7	0	0.0	1	12.5	0	0.0
Total AA	153	100.0	145	100.0	8	100.0	0	0.0
Percentage of Total Farms:				94.8		5.2		0.0
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey								
Note: Percentages may not total 100.0 percent due to rounding.								

State of New Mexico - Las Cruces, NM MSA AA

Table C-3

2020 Las Cruces NM MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	7.3	3,021	5.8	1,484	49.1	12,988	25.1
Moderate	16	39.0	18,140	35.0	5,650	31.1	8,056	15.6
Middle	13	31.7	13,787	26.6	2,889	21.0	8,767	16.9
Upper	9	22.0	16,833	32.5	1,435	8.5	21,970	42.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	41	100.0	51,781	100.0	11,458	22.1	51,781	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,924	1,768	3.6	29.8	3,551	59.9	605	10.2
Moderate	27,608	16,708	34.5	60.5	7,795	28.2	3,105	11.2
Middle	22,506	11,995	24.8	53.3	8,280	36.8	2,231	9.9
Upper	27,548	17,974	37.1	65.2	6,691	24.3	2,883	10.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	83,586	48,445	100.0	58.0	26,317	31.5	8,824	10.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	423	6.9	382	6.8	36	8.2	5	9.1
Moderate	2,093	34.1	1,881	33.4	195	44.5	17	30.9
Middle	1,509	24.6	1,400	24.8	94	21.5	15	27.3
Upper	2,104	34.3	1,973	35.0	113	25.8	18	32.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6,129	100.0	5,636	100.0	438	100.0	55	100.0
Percentage of Total Businesses:				92.0		7.1		0.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4	2.0	4	2.3	0	0.0	0	0.0
Moderate	75	37.7	58	33.3	17	68.0	0	0.0
Middle	53	26.6	51	29.3	2	8.0	0	0.0
Upper	67	33.7	61	35.1	6	24.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	199	100.0	174	100.0	25	100.0	0	0.0
Percentage of Total Farms:				87.4		12.6		0.0

Source: 2020 FFIEC Census Data
2020 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table C-4

2019 Las Cruces NM MSA AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	3	7.3	3,021	5.8	1,484	49.1	12,988	25.1
Moderate	16	39.0	18,140	35.0	5,650	31.1	8,056	15.6
Middle	13	31.7	13,787	26.6	2,889	21.0	8,767	16.9
Upper	9	22.0	16,833	32.5	1,435	8.5	21,970	42.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	41	100.0	51,781	100.0	11,458	22.1	51,781	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	5,924	1,768	3.6	29.8	3,551	59.9	605	10.2
Moderate	27,608	16,708	34.5	60.5	7,795	28.2	3,105	11.2
Middle	22,506	11,995	24.8	53.3	8,280	36.8	2,231	9.9
Upper	27,548	17,974	37.1	65.2	6,691	24.3	2,883	10.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	83,586	48,445	100.0	58.0	26,317	31.5	8,824	10.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	405	6.8	366	6.7	37	8.3	2	4.7
Moderate	2,062	34.8	1,843	33.9	203	45.5	16	37.2
Middle	1,452	24.5	1,346	24.8	92	20.6	14	32.6
Upper	2,006	33.9	1,881	34.6	114	25.6	11	25.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,925	100.0	5,436	100.0	446	100.0	43	100.0
Percentage of Total Businesses:				91.7		7.5		0.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	
Low	4	2.0	4	2.3	0	0.0	0	0.0
Moderate	77	38.5	58	33.5	19	70.4	0	0.0
Middle	54	27.0	52	30.1	2	7.4	0	0.0
Upper	65	32.5	59	34.1	6	22.2	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	200	100.0	173	100.0	27	100.0	0	0.0
Percentage of Total Farms:				86.5		13.5		0.0
Source: 2019 FFIEC Census Data 2019 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Appendix D – Full-Scope Assessment Areas Lending Tables

State of Texas - El Paso County Metropolitan AA

Table D-1

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: El Paso County Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	0.6	0	0.0	0.4	1.8
Moderate	14	60.9	13.8	2,010	54.5	11.7	24.7
Middle	3	13.0	27.6	346	9.4	23.3	33.2
Upper	6	26.1	58.1	1,330	36.1	64.6	40.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	23	100.0	100.0	3,686	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	0.6	0	0.0	0.3	1.8
Moderate	1	100.0	11.4	245	100.0	8.1	24.7
Middle	0	0.0	28.5	0	0.0	22.6	33.2
Upper	0	0.0	59.5	0	0.0	69.0	40.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	245	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	1.3	0	0.0	1.0	1.8
Moderate	0	0.0	19.5	0	0.0	19.4	24.7
Middle	2	100.0	33.3	105	100.0	28.5	33.2
Upper	0	0.0	46.0	0	0.0	51.1	40.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	105	100.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	1	7.7	4.4	800	6.5	1.0	12.3
Moderate	6	46.2	44.4	6,616	54.0	52.3	32.8
Middle	3	23.1	20.0	713	5.8	31.6	31.3
Upper	3	23.1	31.1	4,119	33.6	15.2	23.6
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	13	100.0	100.0	12,248	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	2	4.9	0.6	842	5.1	0.4	1.8
Moderate	22	53.7	13.6	8,921	54.5	12.7	24.7
Middle	8	19.5	28.3	1,164	7.1	23.7	33.2
Upper	9	22.0	57.5	5,449	33.3	63.2	40.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	41	100.0	100.0	16,376	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D-2

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Assessment Area: El Paso County Metropolitan							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	8	34.8	2.2	300	8.1	1.0	22.3
Moderate	2	8.7	10.9	75	2.0	7.0	17.4
Middle	0	0.0	23.9	0	0.0	19.7	19.1
Upper	4	17.4	48.9	1,157	31.4	58.1	41.2
Unknown	9	39.1	14.2	2,154	58.4	14.2	0.0
Total	23	100.0	100.0	3,686	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	4.4	0	0.0	2.3	22.3
Moderate	0	0.0	8.5	0	0.0	4.5	17.4
Middle	0	0.0	15.0	0	0.0	9.9	19.1
Upper	0	0.0	45.0	0	0.0	48.5	41.2
Unknown	1	100.0	26.9	245	100.0	34.7	0.0
Total	1	100.0	100.0	245	100.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	8.0	0	0.0	4.9	22.3
Moderate	0	0.0	12.3	0	0.0	9.0	17.4
Middle	2	100.0	18.5	105	100.0	18.1	19.1
Upper	0	0.0	60.8	0	0.0	67.2	41.2
Unknown	0	0.0	0.5	0	0.0	0.8	0.0
Total	2	100.0	100.0	105	100.0	100.0	100.0
Total Home Mortgage Loans							
Low	9	32.1	2.8	342	8.3	1.3	22.3
Moderate	3	10.7	10.0	125	3.0	6.3	17.4
Middle	2	7.1	20.8	105	2.5	17.2	19.1
Upper	4	14.3	46.6	1,157	28.0	54.8	41.2
Unknown	10	35.7	19.7	2,399	58.1	20.4	0.0
Total	28	100.0	100.0	4,128	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D-3

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: El Paso County Metropolitan							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	46	7.2	6.0	10,018	6.4	6.3	7.0
Moderate	226	35.4	28.6	61,870	39.6	28.5	27.1
Middle	148	23.2	28.4	35,365	22.6	29.0	30.8
Upper	217	34.0	35.1	48,092	30.8	34.1	34.6
Unknown	2	0.3	0.4	850	0.5	0.8	0.4
Total	639	100.0	100.0	156,195	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2019 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-4

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: El Paso County Metropolitan							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	326	51.0	42.3	60,788	38.9	33.2	92.4
Over \$1 Million	263	41.2		88,437	56.6		7.0
Revenue Unknown	50	7.8		6,970	4.5		0.6
Total	639	100.0		156,195	100.0		100.0
By Loan Size							
\$100,000 or Less	290	45.4	95.7	16,170	10.4	49.9	
\$100,001 - \$250,000	160	25.0	2.5	31,443	20.1	14.8	
\$250,001 - \$1 Million	189	29.6	1.8	108,582	69.5	35.3	
Total	639	100.0	100.0	156,195	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	193	59.2		10,571	17.4		
\$100,001 - \$250,000	63	19.3		12,599	20.7		
\$250,001 - \$1 Million	70	21.5		37,618	61.9		
Total	326	100.0		60,788	100.0		

Source: 2019 FFIEC Census Data
2019 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

State of New Mexico - Las Cruces NM, MSA AA

Table D-5

Distribution of 2019 Home Mortgage Lending By Income Level of Geography							
Assessment Area: Las Cruces NM MSA							
Geographic Income Level	Bank And Aggregate Loans						Owner Occupied Units %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	\$%	
Home Purchase Loans							
Low	1	100.0	1.8	95	100.0	1.3	3.6
Moderate	0	0.0	13.3	0	0.0	10.1	34.5
Middle	0	0.0	33.7	0	0.0	31.6	24.8
Upper	0	0.0	51.2	0	0.0	57.0	37.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	95	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	2.6	0	0.0	1.8	3.6
Moderate	0	0.0	15.0	0	0.0	12.6	34.5
Middle	0	0.0	27.4	0	0.0	26.1	24.8
Upper	0	0.0	55.0	0	0.0	59.5	37.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	0.0	0	0.0	0.0	3.6
Moderate	0	0.0	16.7	0	0.0	14.8	34.5
Middle	0	0.0	23.3	0	0.0	20.8	24.8
Upper	0	0.0	60.0	0	0.0	64.4	37.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Multifamily Loans							Multi-family Units %
Low	0	0.0	18.8	0	0.0	9.0	19.1
Moderate	1	100.0	18.8	938	100.0	3.7	11.5
Middle	0	0.0	31.3	0	0.0	14.1	34.6
Upper	0	0.0	31.3	0	0.0	73.2	34.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	938	100.0	100.0	100.0
Total Home Mortgage Loans							Owner Occupied Units %
Low	1	50.0	2.1	95	9.2	1.8	3.6
Moderate	1	50.0	13.9	938	90.8	10.6	34.5
Middle	0	0.0	31.6	0	0.0	29.1	24.8
Upper	0	0.0	52.5	0	0.0	58.5	37.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	1,033	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

Table D-6

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Assessment Area: Las Cruces NM MSA							
Borrower Income Level	Bank And Aggregate Loans						Families by Family Income %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	%	%	
Home Purchase Loans							
Low	0	0.0	2.5	0	0.0	1.1	25.1
Moderate	0	0.0	12.1	0	0.0	7.5	15.6
Middle	0	0.0	22.3	0	0.0	17.6	16.9
Upper	0	0.0	45.6	0	0.0	55.0	42.4
Unknown	1	100.0	17.4	95	100.0	18.9	0.0
Total	1	100.0	100.0	95	100.0	100.0	100.0
Refinance Loans							
Low	0	0.0	3.2	0	0.0	1.5	25.1
Moderate	0	0.0	8.2	0	0.0	4.8	15.6
Middle	0	0.0	15.3	0	0.0	11.7	16.9
Upper	0	0.0	44.2	0	0.0	49.7	42.4
Unknown	0	0.0	29.2	0	0.0	32.4	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Home Improvement Loans							
Low	0	0.0	4.4	0	0.0	1.9	25.1
Moderate	0	0.0	5.6	0	0.0	4.3	15.6
Middle	0	0.0	16.7	0	0.0	14.9	16.9
Upper	0	0.0	65.6	0	0.0	67.6	42.4
Unknown	0	0.0	7.8	0	0.0	11.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total Home Mortgage Loans							
Low	0	0.0	2.8	0	0.0	1.2	25.1
Moderate	0	0.0	10.6	0	0.0	6.6	15.6
Middle	0	0.0	19.9	0	0.0	15.6	16.9
Upper	0	0.0	44.9	0	0.0	52.6	42.4
Unknown	1	100.0	21.8	95	100.0	24.0	0.0
Total	1	100.0	100.0	95	100.0	100.0	100.0
Source: 2019 FFIEC Census Data							
2011-2015 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							
Multifamily loans are not included in the borrower distribution analysis.							

Table D-7

Distribution of 2019 Small Business Lending By Income Level of Geography							
Assessment Area: Las Cruces NM MSA							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
Low	1	2.3	4.7	500	4.2	3.8	6.8
Moderate	15	34.1	33.8	2,114	17.6	30.1	34.8
Middle	10	22.7	22.1	4,776	39.8	21.9	24.5
Upper	18	40.9	34.9	4,597	38.3	40.4	33.9
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Total	44	100.0	100.0	11,987	100.0	100.0	100.0

Source: 2019 FFIEC Census Data
2019 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Table D-8

Distribution of 2019 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Las Cruces NM MSA							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	25	56.8	45.0	7,122	59.4	39.9	91.7
Over \$1 Million	17	38.6		4,640	38.7		7.5
Revenue Unknown	2	4.5		225	1.9		0.7
Total	44	100.0		11,987	100.0		100.0
By Loan Size							
\$100,000 or Less	18	40.9	95.6	1,234	10.3	46.7	
\$100,001 - \$250,000	12	27.3	2.5	2,312	19.3	15.3	
\$250,001 - \$1 Million	14	31.8	2.0	8,441	70.4	38.0	
Total	44	100.0	100.0	11,987	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	14	56.0		960	13.5		
\$100,001 - \$250,000	3	12.0		607	8.5		
\$250,001 - \$1 Million	8	32.0		5,555	78.0		
Total	25	100.0		7,122	100.0		

Source: 2019 FFIEC Census Data
2019 Dun & Bradstreet Data
2011-2015 U.S. Census Bureau: American Community Survey
Note: Percentages may not total 100.0 percent due to rounding.

Appendix E – General Information

Acronyms

ATM	Automated Teller Machine
CDC	Community Development Corporation
CDFI	Community Development Financial Institution
CRA	Community Reinvestment Act (Regulation BB)
FDIC	Federal Deposit Insurance Corporation
HMDA	Home Mortgage Disclosure Act (Regulation C)
HUD	Department of Housing and Urban Development
LIHTC	Low Income Housing Tax Credit
LMI	Low- and Moderate-Income
LTD	Loan-to-Deposit Ratio
LTV	Loan-to-Value Ratio
MD	Metropolitan Division
MSA	Metropolitan Statistical Area
OCC	Office of the Comptroller of the Currency
OMB	Office of Management and Budget
REIS	Regional Economic Information System
SBA	Small Business Administration
USDA	United States Department of Agriculture

Rounding Convention: Because the percentages in the tables were rounded to the nearest tenth in most cases, some columns may not total exactly to 100 percent.

Appendix F – Glossary

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small, relatively permanent statistical subdivision of a county. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts average about 4,000 inhabitants, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to the population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language:

1. Affordable housing (including multi-family rental housing) for low- or moderate-income individuals.
2. Community services targeted to low- or moderate-income individuals.
3. Activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less.
4. Activities that revitalize or stabilize –
 - a. Low- or moderate-income geographies.
 - b. Designated disaster areas.
 - c. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - i. Rates of poverty, unemployment, and population loss.
 - ii. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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, home equity 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).

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 do 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 income of the applicants; the amount of loan requested; and the disposition of the application (for example, approved, denied, or withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

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.

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

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan 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) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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.

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