#### Commercial National Bank Of Texarkana

# Community Reinvestment Act Public File

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(Includes copies of all CRA statements in effect during the past two years. Also, include copies of the notice posted on the bulletin boards at each banking location)

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#### COMMUNITY REINVESTMENT ACT NOTICE

Under the Federal Community Reinvestment Act (CRA), the Comptroller of the Currency evaluates our record of helping to meet the credit needs of this community consistent with safe and sound operations. The Comptroller also takes this record into account when deciding on certain applications submitted by us.

Your involvement is encouraged.

You are entitled to certain information about our operations and our performance under the CRA, including, for example, information about our branches, such as their location and services provided at them; the public section of our most recent CRA Performance Evaluation, prepared by the Comptroller; and comments received from the public relating to our performance in helping to meet community credit needs, as well as our responses to those comments. You may review this information today.

At least 30 days before the beginning of each quarter, the Comptroller publishes a nationwide list of the banks that are scheduled for CRA examination in that quarter. This list is available from the Deputy Comptroller, Southern District, Office of the Comptroller of the Currency, 500 North Akard, Suite 1600, Dallas, TX 75201. You may send written comments about our performance in helping to meet community credit needs to Mr. Robert Sanderson, President, Commercial National Bank, P.O. Box 1998, Texarkana, AR-TX 75504, and Deputy Comptroller, Southern District, Office of the Comptroller of the Currency, 500 North Akard Street, Suite 1600, Dallas, TX 75201. Your letter, together with any response by us, will be considered by the Comptroller in evaluating our CRA performance and may be made public.

You may ask to look at any comments received by the Deputy Comptroller. The e-mail contact for the Deputy Controller is <a href="mailto:cracked-color: blue-mailto:cracked-color: blue-

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# PROCEDURES FOR CRA WRITTEN COMPLAINTS REGARDING COMMERCIAL NATIONAL BANK'S CRA PERFORMANCE

Written complaints received from a consumer, or forwarded to us from the OCC, regarding the bank's performance in helping to meet credit needs in its assessment area will be delivered to the Bank President.

The President will call a meeting of the CRA Officer, Compliance Officer, and the Marketing or Business Development Officer. The President will chair this committee. This committee will decide the appropriate response to any valid written complaint in a timely manner, and will take the action which is warranted.

The answer to the complaint will be made by someone not involved directly in the complaint.

Copies of the written complaint and the written response will be filed in the CRA Public File, if neither the complaint nor the response contains statements that reflect adversely on the good name or reputation of any persons other than the Bank, or publication of which would violate specific provisions of law. Copies may be forwarded to the OCC.



#### **PUBLIC DISCLOSURE**

June 12, 2023

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Commercial National Bank of Texarkana Charter 15257

> 55155 Summerhill Road Texarkana, TX 75505

Office of the Comptroller of the Currency

1402 West Capitol Avenue, Suite 350 Little Rock, AR 72201

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

Charter Number: 15257

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#### **Overall CRA Rating**

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on Commercial National Bank's (CNB or the bank) performance in its one rating area the Texarkana, TX-AR multi-state metropolitan statistical area (MMSA).
- The bank's average loan-to-deposit (LTD) ratio is reasonable at 69.54 percent.
- A substantial majority of the bank's loans are originated inside its assessment areas (AA).
- The bank exhibits adequate responsiveness to community development (CD) needs in the MMSA through CD loans and services. Performance related to CD activities had a neutral effect on the bank's rating.

#### Loan-to-Deposit Ratio

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

At 67.78 percent, CNB's average LTD ratio is reasonable. The LTD ratio was derived using an 11-quarter average spanning June 30, 2019, to December 31, 2021. CNB's average LTD ratio is less than peer; however, this is reasonable considering management's practice of maintaining a strong liquidity position. For this analysis, three similarly situated banks with comparable asset sizes were reviewed for comparison to CNB's performance.

Financial Institution	Total Assets as of 12/31/2021 (\$000s)	Average LTD (%)
Texana Bank, N.A.	\$285,109	102.31%
Bodcaw Bank	\$230,028	83.54%
State Bank of De Kalb	\$477,326	82.54%
Commercial National Bank of Texarkana	\$297,697	67.78%

#### **Lending in Assessment Area**

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

The bank originated and purchased 95.2 percent of its total loans inside its AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. Examiners sampled small business loans and residential mortgage loans originated from January 1, 2019, to

December 31, 2021. The bank was not required to compile and report home mortgage data under the Home Mortgage Disclosure Act (HMDA) during the evaluation period.

Lending Inside and Outside of the Assessment Area										
		Numb	er of L	oans		Dollar A	Total \$(000s)			
Loan Category	Inside		Outside		Total	Inside				Outside
	#	%	#	%	#	\$	%	\$	%	
Home Mortgage	60	50.0%	2	33.3%	62	14,393	59.5%	12	0.3%	\$ 14,404
Small Business	60	50.0%	4	66.7%	64	9,794	40.5%	4,700	99.7%	\$ 14,592
Total	120	95.2%	6	4.8%	126	\$ 24,187	83.4%	\$ 4,812	16.6%	\$ 28,998

#### **Description of Institution**

As of December 31, 2022, CNB is a \$305.8 million, multi-state financial institution headquartered in Texarkana, Texas, and wholly owned by holding company, Commercial Bancshares, Inc. CNB operates six branches comprising two full-service banking centers in Bowie County, Texas, (Summerhill Road and West 7<sup>th</sup> branches) and four full-service banking centers in Miller County, Arkansas (East Ninth St, Fourth St, Fouke, and Arkansas Boulevard branches). All facilities are equipped with either drive- or walk-up cash-dispensing automated teller machines (ATMs). The bank did not participate in any mergers or acquisitions during the evaluation period.

CNB operates in one rating area – the Texarkana, Texas-Arkansas MMSA. The self-identified AA includes all of Bowie County, Texas, and all of Miller County, Arkansas and is appropriate given the bank's branch network locations and lending strategy. The bank's lending strategy focuses primarily on small business lending and 1-4 family residential mortgage lending. The 1-4 family residential mortgage lending portfolio includes loans secured by owner-occupied and non-owner-occupied properties.

As of December 31, 2021, the bank reported total assets of \$297.7 million with \$256.5 million in core deposits and \$177.3 million in net loans (59.6 percent of total assets). The bank's loan product offerings include home purchase, refinance, or improvement; commercial and small business loans, including commercial real estate secured loans; and consumer purpose loans.

According to the June 30, 2022, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, CNB had an 8.73 percent market share in the Texarkana, TX-AR MMSA, making it the fifth largest deposit holder out of 14 financial institutions in the MMSA.

No legal, financial, or other factors impeded the bank's ability to help meet the credit needs in its AA during the evaluation period. The bank received an overall rating of "Satisfactory" at the last CRA evaluation dated April 22, 2019.

#### **COVID-19 Pandemic**

In March 2020, the World Health Organization declared COVID-19 to be a pandemic. In response to the pandemic, the United States was under a shelter-in-place order in an effort to limit the spread of the virus. Due to the shelter-in-place order, certain businesses deemed to be non-essential were shut down or limited in operations. The shut-down limited the ability of bank personnel to provide in-person services. The evaluation of the bank's performance considers the impact of the pandemic.

To assist their borrowers experiencing financial difficulty due to pandemic related economic conditions, the bank offered various services, including:

- Loan payment deferrals and modification of repayment terms.
- Increased, flexible drive through and parking lot services, including the opening of new deposit accounts; closing of existing deposit accounts; acceptance of loan applications and information and closing of such loans; and issuance of instant-issue debit cards; and
- In-person services available through scheduled appointments.

The bank participated in both rounds of the Small Business Administration's (SBA) Paycheck Protection Program (PPP) lending. See the *Community Development* section for this information.

#### **Scope of the Evaluation**

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

Examiners reviewed the bank's performance using the small bank examination procedures for CRA, which requires only the Lending Test. For the Lending Test, the evaluation period was January 1, 2019, through December 31, 2021. In evaluating the bank's lending performance, the OCC sampled residential mortgages and small business loans originated during the evaluation period. Bank management opted for the bank's record of making qualified investments and providing services to be evaluated under the CD Test. The evaluation period for the CD Test was January 1, 2019, through December 31, 2022. Qualifying activities performed in response to the significant impact of the pandemic across the United States are addressed in this evaluation.

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

In each state where the bank has an office, one or more of the AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, MMSA, or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope.

Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs. There are no limited-scope AAs for this performance evaluation.

#### **Ratings**

The bank's overall rating is based on the Texarkana, TX-AR MMSA rating.

In determining primary products, loans products were totaled from the call report, and the top two categories were considered. Primary lending products are residential real estate mortgage loans and small business loans. Home mortgages and small business loans were given equal weight in overall ratings.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

#### Discriminatory or Other Illegal Credit Practices Review

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

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

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

Charter Number: 15257

#### **Multistate Metropolitan Statistical Area Rating**

#### TEXARKANA, TX-AR MMSA

CRA rating for the Texarkana, TX-AR MMSA: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's performance under the Lending Test in the Texarkana, TX-AR MMSA AA is rated Satisfactory. Based on a full-scope review, the bank's performance in this AA is reasonable.
- The bank exhibits reasonable geographic distribution of loans in the MMSA.
- The bank exhibits reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

#### Description of Institution's Operations in Texarkana, TX-AR MMSA

CNB operates six full-service branches within the Texarkana, TX-AR MMSA comprising two branches in Bowie County, Texas and four branches in Miller County, Arkansas. Given the bank's branch network, the AA excludes Little River County, Arkansas. As of the 2015 American Community Survey (ACS) census, the MMSA consisted of 30 census tracts (CTs): five upper-income CTs; 14 middle-income CTs; nine moderate-income CTs; one low-income CT; and one CT with no income information available. This AA is appropriate given the locations of the bank's branches and does not arbitrarily exclude any low- or moderate-incomes CTs.

As of June 30, 2022, CNB's total deposits in the Texarkana, TX-AR MMSA were \$281.5 million, or 8.73 percent of the total market. CNB ranks fifth out of 15 financial institutions in the MMSA. Major competitors in the MMSA are Wells Fargo Bank, Farmers Bank & Trust Company, and Guaranty Bank & Trust. CNB does not have any deposits outside of the market area.

The table on the following page provides a summary of demographics, housing, and business information for the MMSA AA.

Table A – Der	mographic I	nformation	of the Assessn	nent Area					
Assessn	nent Area: T	exarkana T	X-AR MSA 2	021					
Demographic Characteristics # Low Moderate % of # % of # Wof# Wof# Upper % of #									
Geographies (Census Tracts)	30	3.3	30.0	46.7	16.7	3.3			
Population by Geography	136,807	1.5	21.5	53.6	23.3	0.0			
Housing Units by Geography	58,383	1.6	22.6	54.2	21.6	0.0			
Owner-Occupied Units by Geography	32,975	0.9	14.7	57.4	27.0	0.0			
Occupied Rental Units by Geography	17,408	3.2	35.2	47.8	13.7	0.0			
Vacant Units by Geography	8,000	1.1	27.3	54.8	16.8	0.0			
Businesses by Geography	8,665	0.7	25.1	48.4	25.6	0.2			
Farms by Geography	312	0.3	12.2	59.6	27.9	0.0			
Family Distribution by Income Level	34,302	22.5	16.2	19.2	42.1	0.0			
Household Distribution by Income Level	50,383	25.1	15.4	16.9	42.5	0.0			
Median Family Income MSA - 45500 \$51,151 Median Housing Value Texarkana, TX-AR MSA									
		Median Gross	\$711						
			Families Belo	w Poverty Le	vel	16.4%			

Source: 2015 ACS and 2020 D&B Data

Due to rounding, totals may not equal 100.0%

(\*) The NA category consists of geographies that have not been assigned an income classification.

#### **Community Contact**

A community contact interview was conducted to help identify the possible needs within the community. The contact was from a 501-c(3) non-profit that provides rehabilitative services to children in the Texarkana area. The contact indicated the bank has a positive record of helping meet the needs of low-to moderate-income (LMI) individuals through services and donations, including voluntary participation with non-profits in the area.

#### **Housing Characteristics**

Lending to LMI individuals in the Texarkana, TX-AR MMSA is challenging given the limited lending opportunities and elevated poverty levels. As of December 2021, 16.4 percent of families lived below the poverty level. While the MMSA contains only one low-income CT, low-income families represent 22.5 percent of the population. Residential mortgage opportunities in the low-income CT are further limited by only 1.6 percent of housing units being located in the geography. Business lending opportunities within the low-income CT are also limited by the low number of businesses, 0.7 percent, operating in the geography.

Given the high level of LMI borrowers (22.5 percent and 16.2 percent, respectively), home affordability within the Texarkana, TX-AR MMSA is difficult and declining. Historically, home prices were lower in Miller County, Arkansas, compared to Bowie County, Texas. According to Realtor.com, the median housing price in Miller County, Arkansas, was \$120,000, as of June 2020 and increased to \$134,750, as of December 2021. Comparably, Realtor.com reflects the median housing price for Bowie County, Texas,

as of June 2020 to be \$210,000, and as of December 2021 to have increased to \$215,000. However, as of May 2023, the median sold home price for Miller County, Arkansas increased to \$199,000, and the median sold home price for Bowie County, Texas decreased to \$197,800. The median family income for the entire MMSA is \$51,151.

The United States Department of Housing and Urban Development (HUD) defines affordable housing as housing on which the occupant pays no more than 30 percent of gross income for housing costs, including utilities. Considering this standard, assuming a 30-year mortgage with a five percent interest rate, and not accounting for a down payment, homeowner's insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$25,064 annually (or less than 50 percent of the 2021 Federal Financial Institutions Examination Council (FFIEC) median family income in the AA) could afford a \$116,500 mortgage with a payment of \$627 monthly. With the same considerations, a moderate-income borrower making \$40,409 (or less than 80 percent of the 2021 FFIEC median family income in the AA) could afford a \$188,000 mortgage with a payment of \$1,010 monthly. This comparison illustrates the difficulty an LMI borrower may have in qualifying for a mortgage loan in the AA.

#### Scope of Evaluation in Texarkana, TX-AR MMSA

The bank's only AA consists of Bowie County, Texas, and Miller County, Arkansas, within the Texarkana TX-AR MMSA. Examiners sampled the small business loans and residential home mortgage loans and weighted both products equally. During the evaluation, the bank was not required to report data under HMDA. As such, the home mortgage information is considered in context as it is based on a sample of loans rather than on total bank originations and purchases over the evaluation period.

#### LENDING TEST

The bank's performance under the Lending Test in the Texarkana, TX-AR MMSA is rated Satisfactory.

Based on a full-scope review, the bank's performance in the Texarkana, TX-AR MMSA is reasonable.

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

The bank exhibits reasonable geographic distribution of loans in the MMSA.

#### Home Mortgage Loans

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

The geographic distribution of home mortgage loans is excellent. The bank's percentages of home mortgage loans to borrowers in low- and moderate-income geographies exceed the percentages of owner-occupied housing units and the aggregate levels of lending in the geography.

#### Small Loans to Businesses

Refer to table Q in the "MMSA" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. The percentage of loans by number to small businesses in low-income tracts is significantly lower than the percentage of businesses and the aggregate level of lending in the one low-income CT. However, the percentage of businesses located in the low-income CT is nominal at 0.7 percent. Given the low level of businesses located in this geography, lending opportunities in the CT are limited. The bank's percentage of small business loans originated to borrowers in moderate-income tracts is somewhat lower than the percentage of businesses and the aggregate lending level for these geographies.

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

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

#### Home Mortgage Loans

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

The distribution of home mortgage loans by income level of the borrower is reasonable.

The bank's percentage of home mortgage loans to low-income borrowers is lower than the percentage of low-income families in the MMSA and exceeds the aggregate lending level for home mortgage loans to low-income borrowers in the MMSA. The bank's percentage of home mortgage loans to moderate-income borrowers is somewhat lower than the percentage of moderate-income families and exceeds the applicable aggregate lending level in the MMSA. Examiners weighed the bank's performance relative to the aggregate level of lending in the MMSA more heavily than their performance relative to the percentage of LMI borrowers in the MMSA. The high level of families living below the poverty line; declining home affordability evidenced by increasing home prices; and the challenges associated with qualifying and approving borrowers for residential mortgages under these conditions mitigate the bank's performance.

#### Small Loans to Businesses

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

The bank's performance in distributing loans to small businesses in its AA is reasonable.

The bank's percentage of loans to businesses with gross annual revenues (revenues) of \$1 million or less is somewhat lower than the percentage of businesses with revenues of \$1 million or less in the MMSA. However, the bank's percentage of loans to these businesses exceeds the applicable aggregate level of lending. The aggregate lending level better reflects the level of small business loan demand in the MMSA. As such, examiners weighed the bank's performance against the aggregate lending levels more so than the percentage of businesses with revenues of less than \$1 million.

#### **Responses to Complaints**

CNB did not receive any complaints related to the CRA since the prior examination dated April 22, 2019.

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#### COMMUNITY DEVELOPMENT

Based on a full-scope review, the bank exhibits adequate responsiveness to CD needs in the MMSA through CD loans and services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA. Bank management did not submit any CD investments for consideration. Performance related to CD activities had a neutral effect on the bank's rating in the MMSA.

#### Number and Amount of Community Development Loans

The bank originated a relatively high level of CD loans.

Refer to the Community Development Loan table below for the facts and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multi-family loans that also qualify as CD loans.

Community Development Loans within the Texarkana, TX-AR MMSA AA												
		Total										
	#	% of Total #	\$(000's)	% of Total \$								
SBA PPP Loans	391	99.74%	\$ 30,502	99.75%								
CD Loan	1	0.26%	\$ 75	0.25%								
Total	392	100.0%	\$ 30,577	100.0%								

The bank's primary CD lending activity occurred through its voluntary participation in both rounds of the SBA PPP lending program. Loan opportunities are minimal with only 10 LMI CTs in the AA. The number of banks and level of competition for lending opportunities make it even more challenging. CNB originated 392 CD loans totaling \$30.6 million. CD loans consisted of 391 SBA PPP loans and one community service loans. The 391 SBA PPP loans meet the economic development/ stabilization purpose through the general intent to help businesses keep workforces employed during the COVID-19 economic crisis. The bank originated one commercial loan to a non-profit entity that provides services for LMI children.

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

The bank provided a moderate level of CD services. During the evaluation period, the bank donated \$63,470 and 106 hours of employee time to organizations supporting LMI individuals.

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#### Appendix A: Scope of Examination

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

Time Period Reviewed:	Lending Test – January 1, 2019, through December 31, 2021 Community Development – January 1, 2019, through December 31, 2022								
Bank Products Reviewed:	Lending Test - Home mortgage loans and small business loans Community Development – loans, qualified investments, CD service								
Affiliate(s)	Affiliate Relationship	Products Reviewed							
Not applicable	Not applicable	Not applicable							
List of Assessment Areas and Type	of Examination								
Rating and Assessment Areas	Type of Exam	Other Information							
MMSA(s)									
Texarkana, TX-AR MMSA	Full scope	Bowie County, Texas and Miller County, Arkansas. AA does not include outlying Little River County, Arkansas.							

# Appendix B: Summary of MMSA and State Ratings

RATINGS Co	ommercial National Bank of Texarkana
Overall Bank:	Lending Test Rating
Commercial National Bank of Texarkana, charter #15257	Satisfactory
MMSA or State:	
Texarkana, TX-AR MMSA	Satisfactory
,	

#### **Appendix C: Definitions and Common Abbreviations**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **Appendix D: Tables of Performance Data**

#### **Content of Standardized Tables**

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

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

- **Table O.** Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank's assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue
   Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography
   The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Charter Number: 15257

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the
Geography

2019-21

2019-21

	Total Home Mortgage Loans Low-Income Tracts				Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
Assessment Area:	#	\$ (000s)	% of Total	Overall Market	% of Owner- Occupied Housing Units		Aggregate		% Bank Loans	Aggregate	% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units			% of Owner- Occupied Housing Units		
Texarkana, TX-AR MMSA AA	60	9,794	100.0	4,025	0.9	1.7	0.2	14.7	30.0	10.9	57.4	41.7	55.5	27.0	26.7	33.3	0.0	0.0	0.1
Total	60	9,794	100.0	4,025	0.9	1.7	0.2	14.7	30.0	10.9	57.4	41.7	55.5	27.0	26.7	33.3	0.0	0.0	0.1

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the
Borrower

	Total Home Mortgage Loans			Low-In	come Bo	orrowers		lerate-Ir Borrowe		Middle-	Income 1	Borrowers	Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	s	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Texarkana TX- AR MMSA AA	60	9,794	100.0	4,025	22.5	6.7	2.9	16.2	11.7	10.1	19.2	18.3	19.3	42.1	60.0	40.2	0.0	3.3	27.6
Total	60	9,794	100.0	4,025	22.5	6.7	2.9	16.2	11.7	10.1	19.2	18.3	19.3	42.1	60.0	40.2	0.0	3.3	27.6

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Charter Number: 15257

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography  2019-21																			
	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	i Biisinesses i	% Bank Loans	Aggregate

[60]10,853]100.0[2,862] 0.7 0.0 0.4 25.1 13.3 18.9 55.0 48.4 31.7 50.6 25.6 29.8 0.2 0.0 0.2TX-AR MMSA AA |60|10,853|100.0|2,862| **Total** 0.7 0.0 0.4 13.3 55.0 25.1 18.9 48.4 50.6 25.6 31.7 29.8 0.2 0.0 0.2 Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual	2019-21
Revenues	

	Т	otal Loans to	Small Busines	Businesses with Revenues <= 1MM  Businesses with Revenues > 1MM						Businesses with Revenues Not Available		
Assessment Area:	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Texarkana TX- AR MMSA AA	60	10,853	100.0	2,862	80.0	61.7	45.6	5.0	33.3	15.0	5.0	
Total	60	10,853	100.0	2,862	80.0	61.7	45.6	5.0	33.3	15.0	5.0	

Source: 2020 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Texarkana

Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

#### Commercial National Bank of Texarkana

P.O. Box 1998, Texarkana, TX 75504

Phone: 870-773-4561 Fax: 870-772-6914

#### Branch 1 - Downtown

224 East 4th Street Texarkana, AR 71854

Census Tract: 204.00

#### Lobby Hours:

Monday - Thursday: 8:00 AM - 4:00 PM Friday: 8:00 AM - 5:00 PM Phone: 870-773-4561 Drive-Thru Hours:

Monday - Thursday: 8:00 AM - 4:00 PM Friday: 8:00 AM - 5:00 PM

#### Branch 4 - Fouke

Hwy 71 Fouke, AR 71837 Phone: 870-216-3550 Census Tract: 210.00

Lobby Hours:

Monday - Friday: 8:30 AM - 12:00 PM

Drive-Thru Hours:

Monday - Friday: 8:30 AM - 12:00 PM

#### Branch 6 - Arkansas Boulevard

1222 Arkansas Boulevard Texarkana, AR 71854 Phone: 870-216-3530 Census Tract: 201.0

Lobby Hours:

Monday - Thursday: 8:00 AM - 4:00 PM Friday: 8:00 AM - 5:00 PM

Drive-Thru Hours:

Monday - Thursday: 8:00 AM - 4:00 PM Friday: 8:00 AM - 5:00 PM

#### Branch 3 - HWY 82 E (On the Loop)

3204 East 9th Street Texarkana, AR 71854

Census Tract: 206.00

#### Lobby Hours:

Monday - Thursday: 8:00 AM - 4:00 PM
Friday: 8:00 AM - 5:00 PM
Phone: 870-216-3560
Drive-Thru Hours:
Monday - Friday: 8:00 AM - 6:00 PM
Saturday: 8:30 AM - 12:00 PM

#### Branch 5 - Summerhill

5515 Summerhill Road Texarkana, TX, 75503 Phone: 870-216-3506 Census Tract: 109.01

#### Lobby Hours:

Monday - Thursday: 8:00 AM - 4:00 PM Friday: 8:00 AM - 5:00 PM

#### Drive-Thru Hours:

Monday - Friday: 8:00 AM - 6:00 PM Saturday: 8:30 AM - 12:00 PM

#### **Branch 7 - West 7th Street**

4601 W. 7th Street Texarkana, TX 75501 Phone: 870-216-3540 Census Tract: 111

#### Lobby Hours:

Monday - Thursday: 8:00 AM - 4:00 PM Friday: 8:00 AM - 5:00 PM

#### Drive-Thru Hours:

Monday - Thursday: 8:00 AM - 4:00 PM Friday: 8:00 AM - 5:00 PM

#### COMMERCIAL NATIONAL BANK OF TEXARKANA

#### LISTING OF BRANCHES OPENED

No new branches have been opened since May 20, 2019

#### COMMERCIAL NATIONAL BANK OF TEXARKANA

#### LISTING OF BRANCHES CLOSED

None have been closed since May 17, 2019

# LOAN SERVICES

#### **Personal Loans**

At Commercial National Bank, we know there are a variety of reasons why customers need Personal Loans. That's why we offer numerous types of personal loans including: auto, boat, RV, home improvement, the list goes on. Whatever your personal lending needs may be, let one of Commercial National's experienced loan officers assist you in meeting those needs.\*

# **Mortgage Loans**

Turn your dreams of buying or building a home into reality with a mortgage loan from Commercial National Bank. See one of our experienced loan officers and discuss your various mortgage loan options.\*

Unsure about the prospect of buying or how much you can afford to borrow? See our website financial calculators for more planning help.

\* subject to credit approval Equal Housing Lender

<sup>\*</sup> subject to credit approval.

# COMMERCIAL LENDING AND FINANCE

# **Commercial Loans**

At Commercial National Bank, our loan officers are leaders in meeting the needs of any business – large or small. We make many types of commercial loans and offer a wide variety of financing options, including:

- Working Capital Loans
- Commercial Real Estate Loans
- Equipment Loans
- Construction Loans
- · Revolving Lines of Credit
- Letters of Credit
- Inventory Loans
- Commercial Term Loans

If you're interested in applying for a loan or simply have questions concerning your financial needs, call or come in to speak with one of Commercial National's experienced loan officers.

# **Business Visa/MasterCard**

A card issued in your business name will give you freedom and flexibility in making important business related purchases. Plus, you will have an accurate record of all transactions in order to better control your business expenses.\*

<sup>\*</sup> subject to credit approval

# **DEPOSIT SERVICES**

# **Consumer Deposits**

The Bank offers a variety of checking, savings and certificate of deposit accounts for consumers including:

- A free checking account
- A checking account with interest
- A money market account
- Savings accounts
- Certificates of Deposit accounts ranging from shortterm to long-term

Please see any of our Universal Bankers for the terms and conditions and fees that apply to the accounts.

# **Business Deposits**

The Bank offers a variety of checking, savings and certificate of deposit accounts for Business customers including:

- A Small Business checking account
- A Commercial Checking account
- A Business Checking with interest account for qualified organizations.
- A Commercial Money Market Account
- Savings Accounts

- Certificates of Deposit accounts ranging from shortterm to long-term
- An Individual Retirement Account

Please see any of our Universal Bankers for the terms and conditions and fees that apply to the accounts.

# ADDITIONAL SERVICES

# Visa/MasterCard Merchant Setup

With the Visa/MasterCard Merchant Setup, your business is able to accept Visa and MasterCard as a source of payment from your customers. This source gives you the convenience that comes with credit card payment and the convenience your customers expect from their Visa and MasterCard.\*

\* subject to credit approval

# **Account Management**

Account Management Services from Commercial National Bank are designed to save you both time and money. We are able to assist you with: transferring of funds, account reconciliation, direct deposit of payroll, EDI notifications, detailed monthly statements daily balance reporting, wire transfers, automated clearings (ACHs), night deposits, special return item handling, and much, much more.

## **Retirement Services**

Commercial National Bank offers services to allow you and your employees to save for future retirement. Options include Individual Retirement IRAs.

# Safe Deposit Boxes

Protect your business valuables and important documents with a Safe Deposit Box from Commercial National Bank. We offer a variety of shapes and sizes for the safekeeping of your items at the following location:

- 224 East 4th Street, Texarkana, AR
- 5515 Summerhill Road, Texarkana, TX

# **CD-ROM Check Images**

Account reconciliation, tax preparation and check storage are all made easier with CD-ROM check image storage. A CD-ROM is sent with check images placed upon it. You can choose to have one or more accounts placed upon a CD-ROM. This convenient service is available for a fee.

# **Merchant Capture**

Commercial National Bank offers its commercial deposit customers Merchant Capture. This service allows you to deposit checks electronically from your desktop. Office Direct utilizes a desktop scanner that connects to your PC and the internet. With it, you can scan checks received from your customers and issue deposits electronically to the bank anytime day or night. It's the quickest way to turn check deposits into cash. Here's the benefits:

- Consolidate funds from remote locations into one bank without having to transport checks
- Make deposits anytime
- Save time preparing deposits. No more deposit slips to fill out by hand!
- Cut costly courier fees or trips to the bank
- · Reduce risk of check fraud
- More secure
- Extended business day cutoff time
- Receive automated email notifications of all deposits to your account(s)

# **Online Banking**

Commercial National Bank offers its customer's 24-hours a day, 7 days a week online banking service. This service allows you access to the following features:

- Make account inquiries
- Review transaction information including check images
- eStatements
- · account transfers
- bill payment
- ACH origination of your payroll direct deposits and/or direct debits (commercial customers only)
- And much, much more!

## **Overdraft Protection**

With the Overdraft Protection option, you can choose to have your personal checking account linked to either your savings account or your money market account. If a check(s) comes through on your personal checking account and there are not enough funds to cover them, we will automatically transfer money to cover the insufficient items. With this option, your checks will not be returned as long as there are sufficient funds in your savings or money market account. The Overdraft Protection is FREE: however if you need it, you will receive a notice of the transfer by mail and will be charged a fee per transfer.

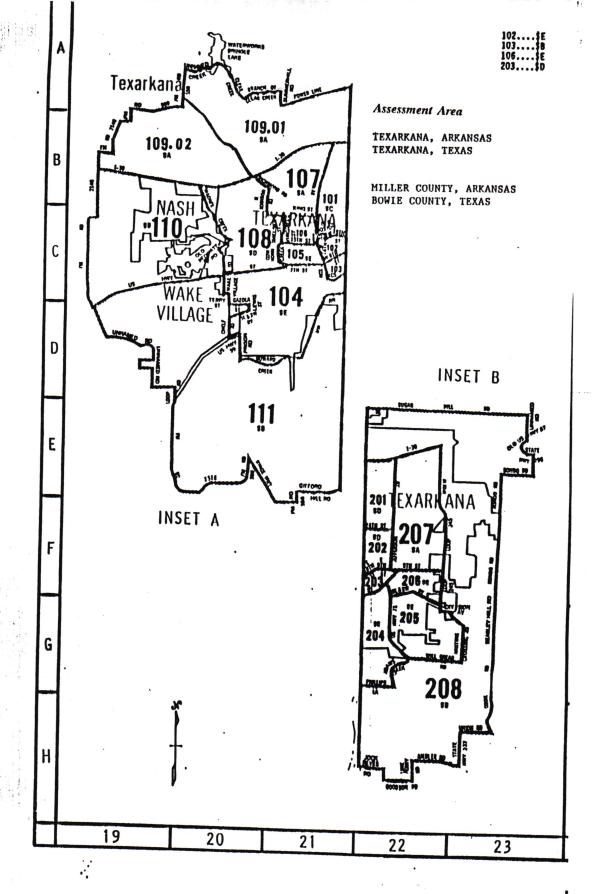
#### **CRA Assessment Area**

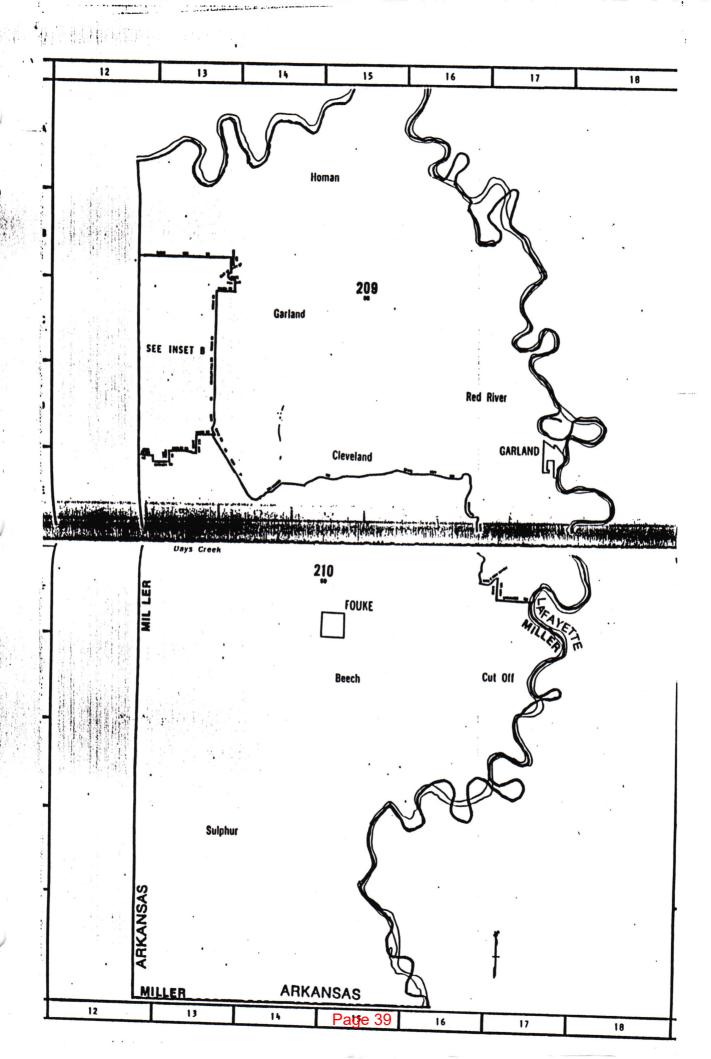
The Bank's assessment area as described in the CRA Statement is as follows:

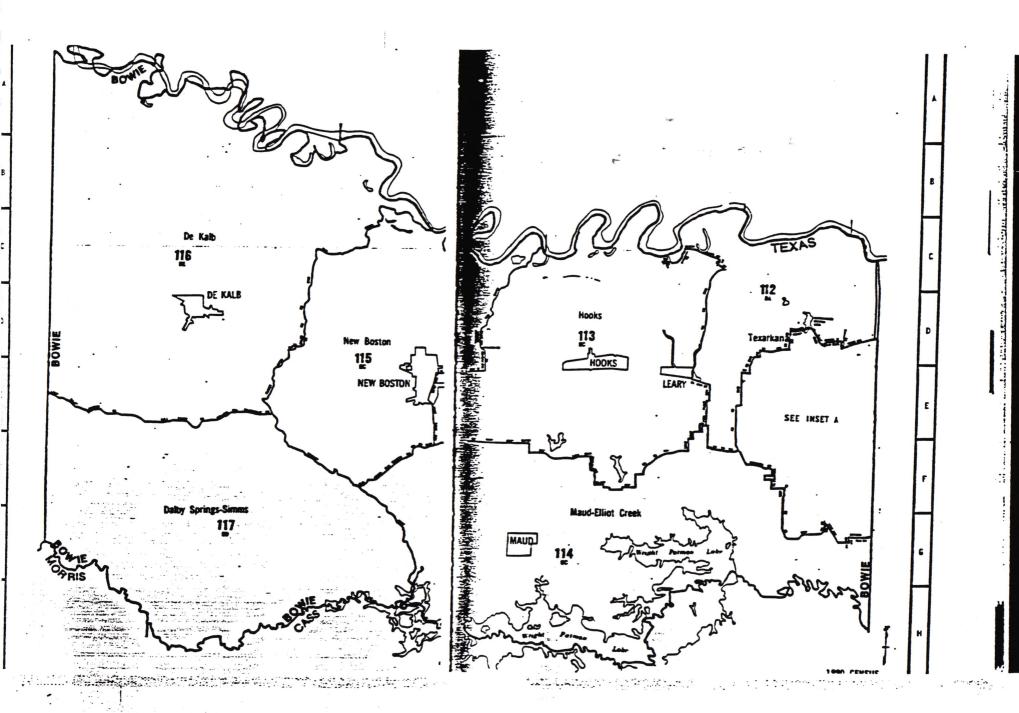
The delineated community is defined primarily as the city of Texarkana, U.S.A. (Texarkana, Arkansas and Texarkana, Texas). The secondary delineation consists of Miller County, Arkansas and Bowie County, Texas. There are thirty census tracts located within the delineated community (primary and secondary.)

# Commercial National Bank of Texarkana Assessment Area Layer Legend Little River Assessment Area Census Tracts Counties 116 \* Branch ATM ★ Branch with ATM 115 Depository Assessment Area **Bowie** Miller No 210 Yes 9501 Miles Morris 9703 The Attus Group Cincinnati, Ohio (513) 761-7650

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# A copy of Commercial National Bank of Texarkana's Home Mortgage Disclosure Statement may be obtained on the Consumer Financial Protection Bureau's (CFPB) website at:

www.consumerfinance.gov/hmda

Commercial National Bank was not required to file Home Mortgage Disclosure Information for the years 2020, 2021 and 2022.

#### COMMERCIAL NATIONAL BANK OF TEXARKANA

# Quarterly Ratios of Loans to Deposits

_		•	
For			Ratio
Quarter	Total	Total	of Loans to
<u>Ended</u>	<u>Deposits</u>	<u>Loans</u>	<b>Deposits</b>
3/31/2022	275,821	192,265	69.71%
	•	•	
6/30/2022	281,452	200,499	71.24%
		•	
9/30/2022	274,128	209,499	76.42%
		•	
12/31/2022	274,258	214,464	78.20%
	,		
3/31/2023	284,087	214,214	75.40%
	,		
6/30/2023	273,913	221,020	80.69%
	,	,	
9/30/2023	282,686	218,721	77.37%
	,	= <b>,</b> - <b>= -</b>	
12/31/2023	288,215	223,432	77.52%
	,	,	