



## **PUBLIC FILE**

Pursuant to the Community Reinvestment Act, the following information is available to the public for inspection upon request and at no cost.

It may be provided electronically or in hard copy.

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- VI. Assessment Area Map and Geographies
- VII. CRA Disclosure Statements
- VIII. HMDA Notice

## **Written Comments from the Public**

The CRA Public File will include all written comments received from the public for the current year and each of the prior two calendar years that specifically relate to the bank's performance in helping to meet community credit needs, and any response to the comments by the bank, if neither the comments nor the responses contain 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.



*Improving Lives, One Community at a Time*

January 22, 2021

North Dallas Bank & Trust Co. (FDIC # 18355)  
12900 Preston Road  
Dallas, TX 75230

Federal Deposit Insurance Corporation  
Dallas Regional Office  
1601 Bryan Street, 38th Floor  
Dallas, TX 75201  
Sent Electronically to [jbanfield@fdic.gov](mailto:jbanfield@fdic.gov)

**RE: Comment on North Dallas Bank & Trust Co. Community Reinvestment Act (CRA) Performance**

I am submitting this letter to North Dallas Bank & Trust Co Community Reinvestment Act (CRA) public file for consideration on North Dallas Bank & Trust Co CRA Performance Evaluation. I have a couple concerns with North Dallas Bank & Trust Co purchase and small business lending in Dallas, and North Dallas Bank & Trust Co has not responded to several meeting request to learn more about the bank's goals and priorities, and to discuss our community development needs and opportunities. We would like North Dallas Bank & Trust Co to focus on Southern Dallas as I believe the heightened poverty in my neighborhood has held back my community, and the city of Dallas as a whole, for too long.

**Lending Concerns**

I worked with the National Community Reinvestment Coalition (NCRC) to analyze the home purchase and small business lending of North Dallas Bank & Trust Co. in Dallas. This is what NCRC found.<sup>1</sup>

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- Dallas County, Texas's estimated population is 2,641,680. Of that approximately 606,168 are African Americans.
- City of Dallas's estimated population is 1,343,573. Of that approximately 322,457 are African Americans.
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  - NCRC compared North Dallas Bank & Trust Co. small business lending to other non-credit card small business lenders in Dallas and found that North Dallas Bank & Trust Co. trailed in lending to businesses with less than \$1 million in annual revenue by 12.8 PP.

Gaps in lending to people of color, borrowers with LMI, and small businesses are usually the result of a lack of products that meet particular credit needs, gaps in marketing, or a lack of partnerships. I believe that working with my organization can improve North Dallas Bank & Trust Co. performance. NCRC also found positive aspects of North Dallas Bank & Trust Co. CRA performance, such as a high amount of community development loans and investments.

### **Per your bank's Performance Evaluation**

**The Lending Test is rated Low Satisfactory.**

### **Focus on Southern Dallas**

The need in Southern Dallas is well documented. HUD has designated Southern Dallas as a racially or ethnically concentrated area of poverty (R/ECAP) since at least 1990, meaning that since 1990 the population of Southern Dallas has had a poverty rate of at least 40%. That poverty rate is more than double the 16.6% poverty rate for Dallas County as a whole.<sup>2</sup> The Urban Institute looked at economic trends, data on income segregation, housing affordability, job availability, and racial disparities in 274 large US cities from 1980 to 2013 and found that Dallas was the least economically and racially inclusive.<sup>3</sup> Increased obstacles to economic opportunity in Southern Dallas has a negative impact on Dallas as a whole. Numerous studies show that high levels of inequality stunt economic growth as it prevents economies from performing to their full potential.<sup>4</sup> Economies with less inequality not only maximize their productive potential, but also minimize the significant fiscal and social costs of inequality. Childhood poverty—one outcome of insufficiently inclusive growth—costs the U.S. economy an estimated \$500 billion a year, or four percent of GDP, due to lost productivity, higher crime and incarceration, and larger health expenditures. Cities end up bearing these costs, at the expense of other

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important investments in growth and opportunity.<sup>5</sup> Heightened inequality also creates resentments and hostilities that damage social and political cohesion, which also negatively affects economic growth.

Researchers are also predicting that Southern Dallas will be particularly hard hit by COVID-19, both medically and economically, given the unfortunate correlation between poverty and unfavorable health outcomes.<sup>6</sup> I am very concerned about the impact COVID-19 will have on my community that was already facing increasing economic hardship, and I believe that without an intentional focus on Southern Dallas these unfortunate economic trends will continue. To make matters worse, many banks do not include Southern Dallas as part of their CRA assessment area. We were NOT pleased to see that North Dallas Bank & Trust Co. Dallas assessment area does NOT include all of Dallas County. We would look forward to North Dallas Bank & Trust Co. to be responsive to our community needs and position itself as a leader in addressing inequality in Dallas.

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CRA requires each financial institution to define one or more assessment areas within which examiners will evaluate its performance. **NDBT delineated portions** of Collin, Dallas, and Denton Counties within the Dallas MD AA as their assessment area. The bank reasonably defined its assessment area to meet CRA requirements. *§ 345.41 Assessment area delineation.*

NDBT **does** arbitrarily exclude high minority and lower moderate-income areas in Southern Dallas. NDBT does not include Southern Dallas (City of Dallas & Dallas County) in their assessment area.

**The following sections discuss demographic in the Southern Dallas assessment area.**

- Southern Dallas is home to 43% of all Dallas residents in just 57% of the city's land area.
- Of the 560,000 residents of neighborhoods in southern Dallas, approximately 38% live below poverty - roughly 9% higher than the City's overall poverty rate of 29%.
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- *The City of Dallas is a unique place. There is a difference between "South Dallas" and "Southern Dallas".*
- *The Southern Sector of Dallas (Southern Dallas) is commonly defined as those areas south of Interstate 30.*
- *The Southern Dallas is 196.7 total square miles. 45% of the City's residents live in Southern Dallas (91% of the residents are minorities in Southern Dallas). \**

**Review your Reasonably Expected Market Area (REMA) to identify redlining that may be happening to the Southern Dallas community.<sup>8</sup>**

- Most regulatory agencies will use the term REMA; however, the Federal Reserve Board performs a similar analysis, but uses the term Credit Market Area (CMA).
- FDIC defines an institution's REMA based on the following factors:
  - Where the institution has received applications
  - Where the institution has originated loans
  - The history of mergers and acquisitions
  - The market area as defined by the bank in its written policies and procedures
  - Branch structure and history including closures, acquisitions, and relocations
  - Physical presence including the location of branches/offices, LPOs, brokers, and other third-party originators.
  - Advertising and marketing efforts including print, telemarketing, and direct mail campaigns.
  - The inappropriate exclusion of majority minority census tracts from the institution's assessment area.
- Redlining risk factors include, but are not limited to the following practices:
  1. Offering different loan programs in different areas
  2. Marketing efforts that exclude and/or target certain geographies
  3. Loan programs that exclude certain types of residential property
  4. Loan minimums without consideration of the average home value

**Questions from the Southern Dallas Community to North Dallas Bank & Trust Co.**

- How many of the CRA small business/small farm loans were made in Southern Dallas (City of Dallas)?
- How many of the CRA small business/small farm loans were made in Southern Dallas County?
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### **Community Ask:**

- Include Southern Dallas County in your Assessment Area
- Increase home loans to African Americans and Hispanic/Latinos
- Increase home loans in the Low-Income census tracts by 40%
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- Advanced implementation of Section 1071 of the Dodd-Frank Act
- Immediate Implementation of Section 342 of the Dodd-Frank Act
- Develop a strategic plan with the input of the Community
  - <https://www.fdic.gov/resources/supervision-and-examinations/consumer-compliance-examination-manual/documents/11/xi-6-1.pdf>
- Create positions for CRA Community Development Mortgage Loan Officers and CRA Commercial Loan Officers
- Launch Small Business Cohort Focuses on Small Minority Businesses located in/or Serving Low Income Areas of Southern Dallas
- Perform a credit needs assessment for Southern Dallas
- Advertise with local minority newspapers
  - Dallas Weekly (<https://www.dallasweekly.com/>)
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- Establish special purpose credit programs (SPCPs) to address lending disparities in Southern Dallas
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### **Conclusion**

We appreciate this opportunity to comment on North Dallas Bank & Trust Co. CRA performance and would look forward to discussing a plan for Southern Dallas and be a leader in addressing inequality in Dallas.

Sincerely,

*James McGee*

James McGee  
President/Chair

[JMcGee@SouthernDallasProgress.com](mailto:JMcGee@SouthernDallasProgress.com)

Southern Dallas Progress Community Development Corporation





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January 26, 2021

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President/Chair

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Southern Dallas Progress Community Development Corporation





*Improving Lives, One Community at a Time*

February 13, 2021

Larry A. Miller/ Michael Shipman-Chairman and CEO  
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<sup>4</sup> "Introduction: Inequality of Economic Opportunity." Katharine Bradbury and Robert K. Triest. RSF: The Russell Sage Foundation Journal of the Social Sciences, Vol. 2, No. 2, Opportunity, Mobility, and Increased Inequality (May 2016), pp. 1-43. Available online at [https://www.jstor.org/stable/10.7758/rsf.2016.2.2.01#metadata\\_info\\_tab\\_contents](https://www.jstor.org/stable/10.7758/rsf.2016.2.2.01#metadata_info_tab_contents)

incarceration, and larger health expenditures. Cities end up bearing these costs, at the expense of other important investments in growth and opportunity.<sup>5</sup> Heightened inequality also creates resentments and hostilities that damage social and political cohesion, which also negatively affects economic growth.

Researchers are also predicting that Southern Dallas will be particularly hard hit by COVID-19, both medically and economically, given the unfortunate correlation between poverty and unfavorable health outcomes.<sup>6</sup> I am very concerned about the impact COVID-19 will have on my community that was already facing increasing economic hardship, and I believe that without an intentional focus on Southern Dallas these unfortunate economic trends will continue. To make matters worse, many banks do not include Southern Dallas as part of their CRA assessment area. We were NOT pleased to see that North Dallas Bank & Trust Co. Dallas assessment area does NOT include all of Dallas County. We would look forward to North Dallas Bank & Trust Co. to be responsive to our community needs and position itself as a leader in addressing inequality in Dallas.

### **Redlining Concerns-DESCRIPTION OF ASSESSMENT AREA**<sup>7</sup>

CRA requires each financial institution to define one or more assessment areas within which examiners will evaluate its performance. **NDBT delineated portions** of Collin, Dallas, and Denton Counties within the Dallas MD AA as their assessment area. The bank reasonably defined its assessment area to meet CRA requirements. *§ 345.41 Assessment area delineation.*

**NDBT does arbitrarily exclude high minority and lower moderate-income areas in Southern Dallas. NDBT does not include Southern Dallas (City of Dallas & Dallas County) in their assessment area.**

**The following sections discuss demographic in the Southern Dallas assessment area.**

- Southern Dallas is home to 43% of all Dallas residents in just 57% of the city's land area.
- Of the 560,000 residents of neighborhoods in southern Dallas, approximately 38% live below poverty - roughly 9% higher than the City's overall poverty rate of 29%.

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<sup>5</sup> "Opportunity for growth: How reducing barriers to economic inclusion can benefit workers, firms, and local economies." Brookings Institution. Joseph Parilla. September 28, 2017. Available online at <https://www.brookings.edu/research/opportunity-for-growth-how-reducing-barriers-to-economic-inclusion-can-benefit-workers-firms-and-local-economies/>.

<sup>6</sup> "Mapping the Areas at Highest Risk of Severe COVID19 in Dallas, Austin and San Antonio." UTHealth School of Public Health Institute for Health Policy. April 2, 2020. Available online at [https://sph.uth.edu/research/centers/ihp/COVID-19\\_Dallas\\_Austin\\_SA%20Final\\_4-3-20.docx.pdf](https://sph.uth.edu/research/centers/ihp/COVID-19_Dallas_Austin_SA%20Final_4-3-20.docx.pdf).

<sup>7</sup> "<https://www.justice.gov/crt/case-document/report-and-recommendation-united-states-v-kleinbank-d-minn>  
<https://www.justice.gov/crt/case-document/order-entering-settlement-agreement-and-agreed-order-united-states-v-first>

<https://www.justice.gov/crt/case-document/consent-order-united-states-v-union-savings-bank-and-guardian-savings-bank-sd-oh-0>

- Overall, 56% of Dallas residents living below poverty live in the southern neighborhoods of Dallas.
- *The City of Dallas is a unique place. There is a difference between "South Dallas" and "Southern Dallas".*
- *The Southern Sector of Dallas (Southern Dallas) is commonly defined as those areas south of Interstate 30.*
- *The Southern Dallas is 196.7 total square miles. 45% of the City's residents live in Southern Dallas (91% of the residents are minorities in Southern Dallas). \**

**Review your Reasonably Expected Market Area (REMA) to identify redlining that may be happening to the Southern Dallas community.** <sup>8</sup>

- Most regulatory agencies will use the term REMA; however, the Federal Reserve Board performs a similar analysis, but uses the term Credit Market Area (CMA).
- FDIC defines an institution's REMA based on the following factors:
  - Where the institution has received applications
  - Where the institution has originated loans
  - The history of mergers and acquisitions
  - The market area as defined by the bank in its written policies and procedures
  - Branch structure and history including closures, acquisitions, and relocations
  - Physical presence including the location of branches/offices, LPOs, brokers, and other third-party originators.
  - Advertising and marketing efforts including print, telemarketing, and direct mail campaigns.
  - The inappropriate exclusion of majority minority census tracts from the institution's assessment area.
- Redlining risk factors include, but are not limited to the following practices:
  1. Offering different loan programs in different areas
  2. Marketing efforts that exclude and/or target certain geographies
  3. Loan programs that exclude certain types of residential property
  4. Loan minimums without consideration of the average home value

*A digitization of the 1937 Homeowners' Loan Corporation 'Residential Security Map' of Dallas, Texas, including the Area Descriptions which were the basis for the neighborhood security ratings.*

#### *Description*

*The plans, laws, and investments made today will shape our communities tomorrow. Indeed, past policies have deep connections to present conditions. Even the most obscure tax codes and legislative*

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<sup>8</sup> REMAs are not defined by fair lending laws, but the concept is not new. The Interagency Fair Lending Examination Procedures reference, "credit markets in which the institution is doing business".

<https://www.ffiec.gov/pdf/fairlend.pdf>

*acts can lead to tragic outcomes for some communities while paving the way for triumphant opportunities for others. Whether at the Federal, State, or Local level, understanding the laws of the land and the context in which they were created is critical to understanding how disparities have arisen and to improving the health, education, transportation, housing, and economic landscapes of our cities in an equitable and sustainable way.*

*This web map was developed in order to analyze the historic development patterns in the Dallas region, and to illustrate the legacy of discriminatory policies such as 'Redlining' and the way highway planning and construction interrupted or destroyed the community fabric of the city. The purpose of integrating these spatial data together is to facilitate helpful dialogue about how public decision making and private markets can produce more equitable outcomes for the future health and sustainability of the region.*

<https://www.arcgis.com/home/item.html?id=29041b0623ef482981e1bcc50220eff6>

The practice of 'redlining,' outlawed years ago, is still seen as a factor in the lack of progress for some Southern Dallas neighborhoods.

Maps from the 1930s designed some neighborhoods as red zones where investments by banks were considered unsafe.

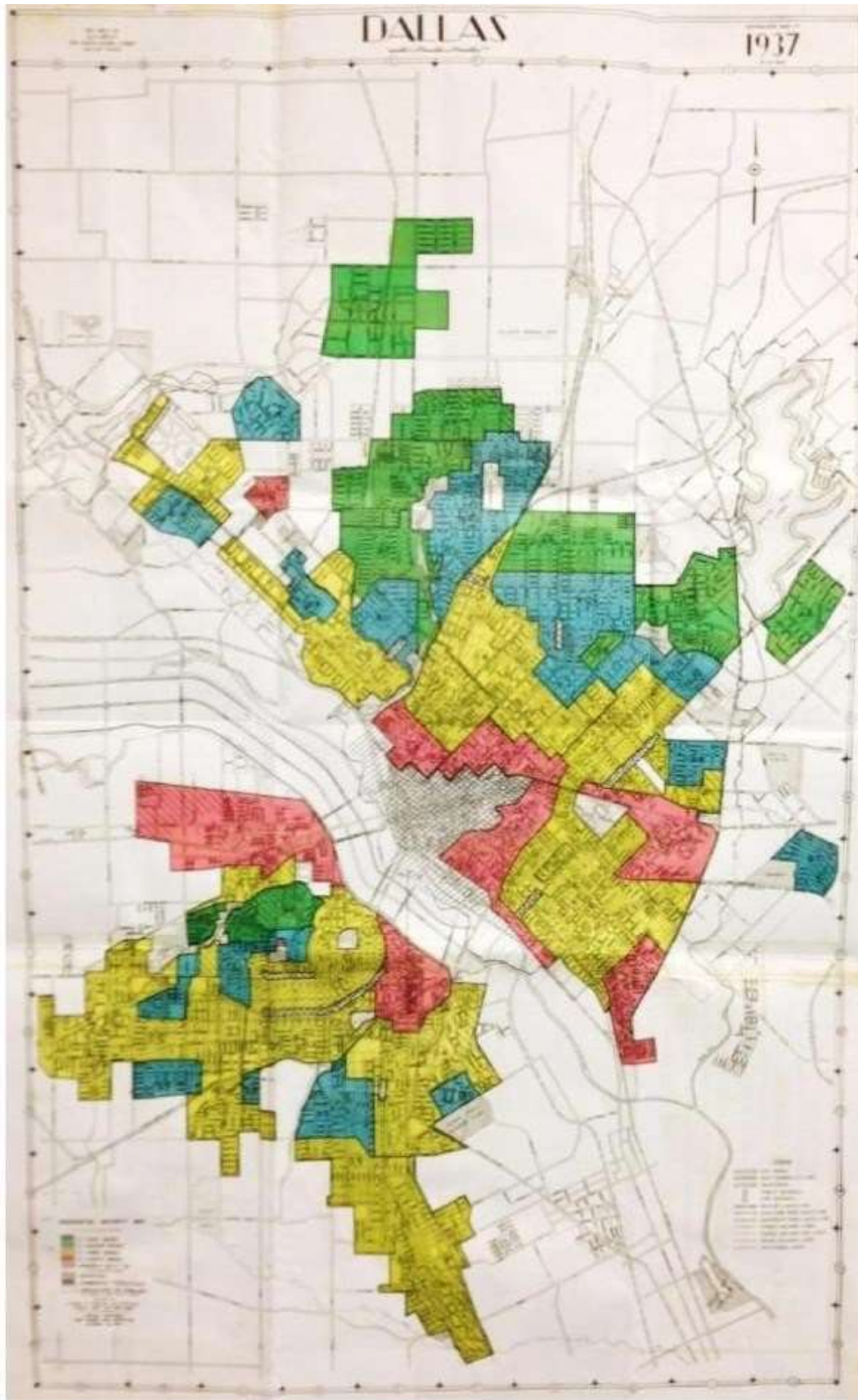
In Dallas, those neighborhoods tended to be inhabited by people of color and redlining kept them from receiving the investments that other sections of the booming sunbelt city saw over the years.

*An interactive online tool released by the National Community Reinvestment Coalition charts out the effects of some of those injustices, combining notorious "redlining" maps of the 1930s with current data on neighborhood income and demographics. Redlining is a term for the denial of loans, mortgages, and other services based on a neighborhood's demographic makeup — in the U.S., black communities have usually been the ones targeted. The practice gets its name from the red outlines drawn around "high-risk" neighborhoods in maps created in the 1930s by the Homeowners' Loan Corporation, a New Deal agency formed to refinance mortgages during the Great Depression.*

<https://ncrc.org/holc/>

*Those HOLC maps have become infamous as stark visual representations of the government abandoning black communities, as a federal agency labeled nearly any community with a significant minority population "hazardous" for lenders. Researchers at the University of Richmond digitized the maps last year, and its site lets you see HOLC's assessments of each neighborhood, many of them remarkably frank about their racist discrimination. A 1937 HOLC map of Dallas is below. Neighborhoods marked green were considered "best" for government-backed mortgages, blue "still desirable," yellow "definitely declining," and red "hazardous."*





### **23 Southern Dallas Zip Codes**

75116, 75134, 75203, 75207, 75208, 75210, 75211, 75212, 75215, 75216, 75217, 75223, 75224, 75226, 75227, 75228, 75232, 75233, 75236, 75237, 75241, 75249, 75253

### **Questions from the Southern Dallas Community to North Dallas Bank and Trust**

- How many mortgage loans were made to minority borrowers were in Southern Dallas (City of Dallas)?
- How many mortgage loans were made to African American borrowers in Southern Dallas (City of Dallas) and how many were in low-income census tracts?
- How many of the CRA small business/small farm loans were made in Southern Dallas (City of Dallas)?
- How many of the CRA small business/small farm loans were made in Southern Dallas (City of Dallas) and how many were in low-income census tracts?
- How many Commercial loans were made in Southern Dallas (City of Dallas)?
- How many Commercial loans were made in Southern Dallas (City of Dallas) and how many were in low-income census tracts?
- How many Commercial loans were made in Southern Dallas County and how many were in low-income census tracts?

### **Community Ask:**

- Include Southern Dallas County in your Assessment Area
- Increase home loans to African Americans and Hispanic/Latinos
- Increase home loans in the Low-Income census tracts
- Increase small business lending to African Americans
- Increase small business lending to Hispanics
- Increase Small business lending in Low-Income census tracts
- Advanced implementation of Section 1071 of the Dodd-Frank Act
  - [https://files.consumerfinance.gov/f/documents/cfpb\\_1071-sbrefa\\_outline-of-proposals-under-consideration\\_2020-09.pdf](https://files.consumerfinance.gov/f/documents/cfpb_1071-sbrefa_outline-of-proposals-under-consideration_2020-09.pdf)
- Launch Small Business Cohort Focuses on Small Minority Businesses located in/or Serving Low Income Areas of Southern Dallas
  - <https://www.nteetc.com/>
- Perform a credit needs assessment for Southern Dallas & Create a Business Diversity Lending Program
- Require the CDFI's that you invest in to collect demographic information on the individuals they serve
  - <https://www.consumerfinance.gov/compliance/supervisory-guidance/statement-collection-demographic-information-community-development-financial-institutions/>
- Create African American Micro Business Loan Fund with CDFI

- Example:
  - <https://www.chicago.gov/content/dam/city/depts/bacp/Small%20Business%20Center/africanamericanloanprogramtermsheet.pdf>
- Make CRA Qualified Investments to Dallas based CDFIs that focus on Southern Dallas
  - <https://www.advacentx.org/>
  - <https://www.liftfund.com/>
  - <https://bcloftexas.org/contact>
- Make donations to minority lead organizations that focus on Southern Dallas with operating incomes under \$600,000
  - <https://racialequity.org/2018/11/minority-led-nonprofits/>
  - <https://www.philanthropy.com/article/nonprofits-led-by-people-of-color-win-less-grant-money-with-more-strings-study/>
- Establish special purpose credit programs (SPCPs) to address lending disparities in Southern Dallas
  - <https://www.consumerfinance.gov/about-us/newsroom/consumer-financial-protection-bureau-issues-advisory-opinion-to-help-expand-fair-equitable-and-nondiscriminatory-access-to-credit/>
  - Recommendations Available.
- Volunteer and Support Youth Entrepreneurship Programs
  - <https://targetevolution.org/about-us>
  - <https://lemonadeday.org/greater-dallas>
  - <https://www.nfte.com/north-texas/>
  - <https://www.starsunitedglobaloutreach.org/>
- Advertise with local minority newspapers
  - Dallas Weekly (<https://www.dallasweekly.com/>) & North Dallas Gazette (<https://northdallasgazette.com/>)
- Develop a strategic plan with the input of the Community
  - <https://www.occ.treas.gov/topics/consumers-and-communities/cra/national-banks-eval-basis-of-strategic-plan-under-cra.html>
- Create positions for CRA Community Development Commercial and Mortgage Loan Officers

## Conclusion

We appreciate this opportunity to comment on North Dallas Bank & Trust Co. CRA performance and would look forward to discussing a plan for Southern Dallas and be a leader in addressing inequality in Dallas.

Sincerely,

*James McGee*

James McGee

President/Chair

[JMcGee@SouthernDallasProgress.com](mailto:JMcGee@SouthernDallasProgress.com)

Southern Dallas Progress Community Development Corporation



*Improving Lives, One Community at a Time*

August 25, 2022

Larry A. Miller  
North Dallas Bank & Trust Co. (FDIC # 18355)  
12900 Preston Road  
Dallas, TX 75230

Federal Deposit Insurance Corporation  
Dallas Regional Office  
1601 Bryan Street, 38th Floor  
Dallas, TX 75201

**RE: Discrimination and Redlining Complaint against North Dallas Bank & Trust**

Dear FDIC,

The undersigned community organization is submitting this letter to file a complaint against North Dallas Bank & Trust. Since 1961, North Dallas Bank & Trust has excluded several Low to Moderate Income Census Tracts from their assessment area map. Also, the census tracts excluded are majority minority.

The Community Reinvestment Act (CRA) is a law intended to encourage depository institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income (LMI) neighborhoods.

North Dallas Bank & Trust is not meeting the needs of our community, which specifically includes low- and moderate-income neighborhoods located in Southern Dallas. North Dallas Bank & Trust fails to provide small business and/or consumer lending services in Southern Dallas' majority African American communities.

**Southern Dallas Zip Codes (LMI/High Minority Areas)**

75203, 75207, 75208, 75210, 75211, 75212, 75215, 75216, 75217, 75223, 75224, 75226, 75227, 75228, 75232, 75233, 75236, 75237, 75241, 75249, 75253

**The following sections discuss demographic in the Southern Dallas area.**

- Southern Dallas is home to 43% of all Dallas residents in just 57% of the city's land area.
- Of the 560,000 residents of neighborhoods in southern Dallas, approximately 38% live below poverty - roughly 9% higher than the City's overall poverty rate of 29%.
- Overall, 56% of Dallas residents living below poverty live in the southern neighborhoods of Dallas.
- *The City of Dallas is a unique place. There is a difference between "South Dallas" and "Southern Dallas".*
- *The Southern Sector of Dallas (Southern Dallas) is commonly defined as those areas south of Interstate 30.*
- *The Southern Dallas is 196.7 total square miles. 45% of the City's residents live in Southern Dallas (91% of the residents are minorities in Southern Dallas).*

**Concerns:**

- North Dallas Bank & Trust does have any African Americans/Hispanics on the DFW MSA Leadership Team or on the Board of Directors.
- North Dallas Bank & Trust does not have a branch located in a low-income census tract in the DFW MSA.
- North Dallas Bank & Trust does not have a branch located in a high minority/high poverty<sup>1</sup> census tract in the DFW MSA.
- North Dallas Bank & Trust does not originate any commercial loans in low-income census tracts in the DFW MSA.
- North Dallas Bank & Trust does not originate any commercial loans in high minority/ high poverty<sup>2</sup> census tracts in the DFW MSA.
- North Dallas Bank & Trust does not originate any small business loans to businesses with less than a million dollar in revenue that was in low-income census tracts in the DFW MSA.
- North Dallas Bank & Trust does not originate small business loans to businesses with less than a million dollar in revenue that was in high minority/ high poverty census tracts in the DFW MSA.
- North Dallas Bank & Trust does not offer any solutions for the 163,000 unbanked/underbanked residents in the DFW MSA
- North Dallas Bank & Trust branches are only located in white-majority neighborhoods, compared to having none in majority-minority neighborhoods<sup>3</sup>

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<sup>1</sup> High Minority/High Poverty=Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) [https://hudgis-hud.opendata.arcgis.com/datasets/56de4edea8264fe5a344da9811ef5d6e\\_0](https://hudgis-hud.opendata.arcgis.com/datasets/56de4edea8264fe5a344da9811ef5d6e_0)

<sup>3</sup> DOJ Redlining Cases/ Few or no branches; <https://www.fhcci.org/wp-content/uploads/2013/08/Jonathan-Bont-Redlining.pdf>

The Dallas–Fort Worth–Arlington metropolitan statistical area's population was 7,573,136 according to the U.S. Census Bureau's 2019 population estimates, making it the most populous metropolitan area in both Texas and the Southern United States, the fourth largest in the U.S., and the tenth largest in the Americas. The Dallas–Fort Worth metroplex has over one million African-American and the second-largest metro population of African-Americans in Texas.

**North Dallas Bank & Trust engages in unlawful redlining by acting to meet the credit needs of majority-White neighborhoods in the Dallas-Fort Worth Metropolitan Statistical Area ("DFW MSA" or "MSA") while avoiding the credit needs of majority-minority neighborhoods.**

In addition, North Dallas Bank & Trust engages in lending discrimination by “redlining” predominantly African American and Hispanic neighborhoods in Southern Dallas County. “Redlining” is a term describing an illegal practice in which lenders intentionally avoid providing services to individuals living in predominantly minority neighborhoods because of the race of the residents in those neighborhoods.

*Dallas is a majority minority city (66.1 percent of population) with 41.8 percent of residents identifying as Hispanic and 24.3 percent identifying as Black.*

*Dallas is a city with a population of just under 1,344,000, including 24.3 percent African American residents, 41.8 percent Hispanic/Latinx residents, and 3.4 percent Asian residents; and 30.5 White (Non-Hispanic)*

*With 2,622,634 people, Dallas County is the 2nd most populated county in the state of Texas out of 254 counties. The largest Dallas County racial/ethnic groups are Hispanic (40.2%) followed by White (28.6%) and Black (22.3%).*

#### **Redlining/DESCRIPTION OF ASSESSMENT AREA**<sup>4</sup>

Per Performance Evaluation:

*CRA requires each financial institution to define one or more assessment areas within which examiners will evaluate its performance. NDBT delineated portions of the Dallas-Plano-Irving Metropolitan Division (Dallas MD AA) as their assessment area. The bank reasonably defined its assessment area to meet CRA requirements. The following sections discuss demographic and economic information for the assessment area.*

*The Dallas MD AA contains 346 census tracts in portions of Collin, Dallas, and Denton Counties. These counties comprise three of the seven counties in the Dallas MD. According to the 2015 American*

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<sup>4</sup> “<https://www.justice.gov/crt/case-document/report-and-recommendation-united-states-v-kleinbank-d-minn>  
<https://www.justice.gov/crt/case-document/order-entering-settlement-agreement-and-agreed-order-united-states-v-first>  
<https://www.justice.gov/crt/case-document/consent-order-united-states-v-union-savings-bank-and-guardian-savings-bank-sd-oh-0>



*Community Survey (ACS) Census Data, the assessment area contained 33 low-income, 57 moderate-income, 75 middle-income, 178 upper-income, and 3 census tracts with no income designation. Since the prior evaluation, the assessment area remained stable. As noted previously, the bank maintains five full-service locations in this assessment area.*

To clarify, the Dallas MD AA consists of 529 contiguous census tracts in Dallas County, which comprises a portion of the Dallas-Plano-Irving MD and has a total population of 2,667,720. According to the 2015 ACS US Census, the assessment area contained 107 low-income, 187 moderate-income, 110 middle-income, 120 upper-income census tracts, and 5 census tracts with no income designation.

CRA requires each financial institution to define one or more assessment areas within which examiners will evaluate its performance. **Dallas BANK delineated portions of Dallas County** within the Dallas MD AA assessment area. The bank should reasonably define its assessment area to meet CRA requirements. § 345.41 Assessment area delineation.

DCB **does** arbitrarily exclude high minority and lower moderate-income areas in Southern Dallas. DCB does not include Southern Dallas (City of Dallas & Dallas County) in their assessment area.

North Dallas Bank & Trust **does** arbitrarily exclude high minority and low to moderate-income areas in Southern Dallas County from 1972 to 2022.<sup>5</sup> North Dallas Bank & Trust did not include Southern Dallas (City of Dallas & Dallas County) in their assessment area from 1972 to 2022.

#### **Equal Credit Opportunity Act (ECOA) and Fair Housing Act (FHA)**

North Dallas Bank & Trust violates Equal Credit Opportunity Act (ECOA) and the Fair Housing Act (FHA) by discriminating against African Americans and other minority consumers. The Equal Credit Opportunity Act (ECOA) prohibits lenders from discriminating based on race and other characteristics.

As both the Equal Credit Opportunity Act (ECOA) and the Interagency Fair Lending Examination Procedures remind us, “A creditor shall not discriminate against an applicant regarding any aspect of a credit transaction”; **this includes small business and commercial lending.**

In terms of the discrimination, we assert that North Dallas Bank & Trust does engage in the following:

- Made no efforts to market to African Americans and/or Hispanics in Southern Dallas
- Does not specifically target any marketing toward Hispanic and/or African Americans in the DFW MSA and specifically Southern Dallas
- Does not employ an African American and/or Hispanics commercial and/or mortgage loan officers in the DFW MSA

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<sup>5</sup> “<https://www.justice.gov/crt/case-document/report-and-recommendation-united-states-v-kleinbank-d-minn>  
<https://www.justice.gov/crt/case-document/order-entering-settlement-agreement-and-agreed-order-united-states-v-first>  
<https://www.justice.gov/crt/case-document/consent-order-united-states-v-union-savings-bank-and-guardian-savings-bank-sd-oh-0>



- Received few applications from African Americans & Hispanics in the DFW MSA
- Received almost no applications from applicants for properties located in African American and Hispanic Low to Moderate Income neighborhoods in the DFW MSA
- Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA

Regulation B, the ECOA's implementing regulation, provides that a creditor shall not make any oral or written statement, in advertising or otherwise, to applicants or prospective applicants that would discourage on a prohibited basis a reasonable person from making or pursuing an application. But the ECOA itself does not set forth such a prohibition.

### **Lending Concerns**

I worked with the National Community Reinvestment Coalition (NCRC) to analyze the home purchase and small business lending of North Dallas Bank & Trust Co. in Dallas. This is what NCRC found.

- According to the Home Mortgage Disclosure Act (HMDA) data from 2018 to 2019, NDBT made a total of 133 in Dallas County. This data demonstrated that in 2019, 3.75% (5) of all home loans in Dallas went to minorities however only 1% (2) of NDBT's home loans were extended to Blacks (African Americans).
  - Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA
- According to the Home Mortgage Disclosure Act (HMDA) data from 2019 to 2020, NDBT made a total of 405 in Dallas County. This data demonstrated that in 2020, 12.59% (51) of all home loans in Dallas went to minorities however only 0% (0) of NDBT's home loans were extended to Blacks (African Americans).
  - Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA
- Small Business Lending
  - Received almost no applications from applicants for properties located in African American and Hispanic Low to Moderate Income neighborhoods in the DFW MSA
  - North Dallas Bank & Trust does not originate any commercial loans in low-income census tracts in the DFW MSA.
  - North Dallas Bank & Trust does not originate any commercial loans in high minority/ high poverty<sup>6</sup> census tracts in the DFW MSA.
  - North Dallas Bank & Trust does not originate any small business loans to businesses with less than a million dollar in revenue that was in low-income census tracts in the DFW MSA.
  - North Dallas Bank & Trust does not originate small business loans to businesses with less than a million dollar in revenue that was in high minority/ high poverty census tracts in the DFW MSA.

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### **Products available for the Underserved/Minority Communities**

Access to affordable credit is a key component of an individual's ability to cultivate a strong financial position and participate fully in the DFW economy. The Equal Credit Opportunity Act of 1974 was passed to protect all consumers, yet the effects of the discrimination endure today.

North Dallas Bank & Trust failed to offer any solutions for the 163,000 unbanked/underbanked residents in the DFW MSA.

- [https://household-survey.fdic.gov/place-data?type=msa&area=Dallas\\_Fort\\_Worth\\_Arlington\\_TX](https://household-survey.fdic.gov/place-data?type=msa&area=Dallas_Fort_Worth_Arlington_TX)
  - The underbanked/unbanked information is available on the FDIC website.
- <https://www.aba.com/about-us/press-room/press-releases/aba-urges-americas-banks-to-offer-bank-on-certified-accounts>

North Dallas Bank & Trust does not have any special-purpose credit programs to address their disparities in small business lending in underserved high minority communities like Southern Dallas.

- <https://www.consumerfinance.gov/about-us/newsroom/consumer-financial-protection-bureau-issues-advisory-opinion-to-help-expand-fair-equitable-and-nondiscriminatory-access-to-credit/>
- [https://www.hud.gov/sites/dfiles/GC/documents/Special\\_Purpose\\_Credit\\_Program\\_OGC\\_guidance\\_12-6-2021.pdf](https://www.hud.gov/sites/dfiles/GC/documents/Special_Purpose_Credit_Program_OGC_guidance_12-6-2021.pdf)
- [12 CFR § 202.8 - Special purpose credit programs.](#)
  - <https://www.ffiec.gov/PDF/fairlend.pdf>

### **Activities under the CRA since 2020 CRA Performance Evaluation**

North Dallas Bank & Trust failed to describe any significant CRA initiatives undertaken, particularly with respect to credit and deposit products and retail banking services targeted toward low- and moderate-income geographies, African American/Hispanic geographies, and individuals, identifying key elements of the products and services, the approximate date introduced, and results achieved to date.

North Dallas Bank & Trust failed to provide any details current community outreach and marketing efforts to residents and businesses throughout Bank's low-income census tracts, moderate-income census tracts, and major minority census tracts.

### **Community Development Lending**

North Dallas Bank & Trust failed to provide the number of loans made in Southern Dallas compared to Northern Dallas.

### **Small Business/Commercial Lending**

North Dallas Bank & Trust failed to provide the number of loans made in Southern Dallas compared to Northern Dallas.

### **Lack of Staff and Board Diversity**

North Dallas Bank & Trust does not have any African Americans and/or Hispanics on the Board of Directors.

North Dallas Bank & Trust does not have any African Americans and/or Hispanics on the DFW MSA Leadership Team.

North Dallas Bank & Trust does not have any Commercial Loans Officers in the DFW MSA that are African Americans and/or Hispanics.

North Dallas Bank & Trust does not have any Mortgage Loans Officers in the DFW MSA that are African Americans and/or Hispanics.

North Dallas Bank & Trust does not participate in the Dodd-Frank Act Section 342(b)(2)(C) Diversity self-assessment.

*The DFW MSA is majority minority.*

### **North Dallas Bank & Trust is not a member of any of the Minority Trade Organizations below:**

<https://regionalhca.org/>

<https://www.namcdfw.org/>

<https://blackcontractors.org/>

<https://aacatx.com/>

### **North Dallas Bank & Trust is not a member of any of the Minority Chambers below:**

<https://dallasblackchamber.org/>

<https://arlingtonblackchamber.org/>

<https://fwmbcc.org/>

<https://fwhcc.org/>

<https://www.gdhcc.com/>

### **North Dallas Bank & Trust is not a member of any of the Minority Real Estate Trade Organizations below:**

<https://www.narebdallas.org/>

<http://nahrepdallas.org/>

<https://www.varep.net/index.php/dallas-chapter>

<https://narebnorthtexas.org/nareb-north-texas>

<https://wcdallas.com/>

<https://realestatealliance.org/>

<https://www.areaa.org/dfw>

### **Redlining Cases**

*Justice Department and Office of the Comptroller of the Currency Announce Actions to Resolve Lending Discrimination Claims Against Cadence Bank*

<https://www.justice.gov/opa/pr/justice-department-and-office-comptroller-currency-announce-actions-resolve-lending>

*CFPB Files First Ever Redlining Complaint Against a Non-Bank Mortgage Lender*

<https://www.consumerfinance.com/2020/07/20/cfpb-files-first-ever-redlining-complaint-against-a-non-bank-mortgage-lender/>

*Regulation B prohibits discouragement of “applicants or prospective applicants”. Specifically, it states: “A creditor shall not make any oral or written statement, in advertising or otherwise, to applicants or prospective applicants that would discourage on a prohibited basis a reasonable person from making or pursuing an application.” The Official Interpretations of Regulation B also explain that this prohibition “covers acts or practices directed at prospective applicants that could discourage a reasonable person, on a prohibited basis, from applying for credit.”*

*In the course of conducting supervisory activity, examiners observed that a lender violated ECOA and Regulation B by engaging in acts or practices directed at prospective applicants that would have discouraged reasonable people in minority neighborhoods in Metropolitan Statistical Areas (MSAs) from applying for credit.*

[https://files.consumerfinance.gov/f/documents/cfpb\\_supervisory-highlights\\_issue-24\\_2021-06.pdf](https://files.consumerfinance.gov/f/documents/cfpb_supervisory-highlights_issue-24_2021-06.pdf)

*DOJ, CFPB, and OCC announce aggressive redlining initiative; take action against national bank for alleged lending discrimination*

<https://buckleyfirm.com/blog/2021-10-26/doj-cfpb-and-occ-announce-aggressive-redlining-initiative-take-action-against-national-bank-alleged-lending-discrimination>

### **Conclusion**

The CRA regulation is very clear — a finding that a bank failed to comply with laws on fair and responsible lending trumps otherwise satisfactory or even outstanding CRA performance. The CRA

regulations specifically state that a rating will be "adversely affected by evidence of discriminatory or other illegal credit practices," including but not limited to violations of the Equal Credit Opportunity Act, the Fair Housing Act, the Home Ownership and Equity Protection Act, the Federal Trade Commission Act, the Real Estate Settlement Procedures Act, and the Truth in Lending Act.

North Dallas Bank & Trust redlined our Southern Dallas Community from 1961 to 2022.

We would look forward to this case being reviewed and referred to the U.S. Department of Justice (DOJ) and the Consumer Financial Protection Bureau (CFPB).

Sincerely,

*James McGee*

James McGee  
President/Chair  
[JMcGee@SouthernDallasProgress.com](mailto:JMcGee@SouthernDallasProgress.com)  
Southern Dallas Progress Community Development Corporation

### **Research on DFW MSA Community Needs**

*Dallas has a housing shortage of approximately 20,000 units.*

<https://dallascityhall.com/departments/housing-neighborhood-revitalization/DCH%20Documents/Adopted%20Housing%20Policy.pdf>

North Texas Regional Housing Assessment

<https://dhantx.com/report/north-texas-regional-housing-assessment/>

Dallas' Small Business Ecosystem Assessment

<https://www.dallasecocodev.org/DocumentCenter/View/2789/Dallas-Small-Business-Ecosystem-Report-PDF>

Report on Housing Affordability and Vulnerability in Dallas, Texas

<https://nalcab.org/nalcab-releases-report-on-housing-affordability-and-vulnerability-in-dallas-texas/>

FINDING G: MINORITY OWNED BUSINESSES ACCESS TO CREDIT/CAPITAL ANALYSIS (CHAPTER 6)

<https://dallascityhall.com/departments/public-affairs-outreach/DCH%20Documents/availability-disparity-study.pdf>

<https://www.fortworthtexas.gov/files/assets/public/diversity-inclusion/documents/business-equity/2020-city-of-fort-worth-disparity-study.pdf>





*Improving Lives, One Community at a Time*

May 13, 2023

Larry A. Miller  
North Dallas Bank & Trust Co.  
12900 Preston Road  
Dallas, TX 75230

Federal Deposit Insurance Corporation  
Dallas Regional Office  
1601 Bryan Street, 38th Floor  
Dallas, TX 75201

**RE: Discrimination and Redlining Compliant**

Dear Federal Regulator,

The undersigned community organization is submitting this letter to file a redlining and discrimination complaint against North Dallas Bank & Trust. Since 1961, North Dallas Bank & Trust has excluded several Low to Moderate Income Census Tracts from there assessment area map. Also, the census tracts excluded are majority minority.

North Dallas Bank & Trust 's exclusion of Southern Dallas' low to moderate income and majority minority neighborhoods from its CRA assessment area reduced credit availability, investments, lending and discouraged prospective applicants.

**REDLINING CONERNS/ DESCRIPTION OF ASSESSMENT AREA**

Per Performance Evaluation:

*CRA requires each financial institution to define one or more assessment areas within which examiners will evaluate its performance. NDBT delineated portions of the Dallas-Plano-Irving Metropolitan Division (Dallas MD AA) as their assessment area. The bank reasonably defined its assessment area to meet CRA requirements. The following sections discuss demographic and economic information for the assessment area.*

*The Dallas MD AA contains 346 census tracts in portions of Collin, Dallas, and Denton Counties. These counties comprise three of the seven counties in the Dallas MD. According to the 2015 American Community Survey (ACS) Census Data, the assessment area contained 33 low-income, 57 moderate-income, 75 middle-income, 178 upper-income, and 3 census tracts with no income designation. Since the prior evaluation, the assessment area remained stable. As noted previously, the bank maintains five full-service locations in this assessment area.*

To clarify, the Dallas MD AA consists of 529 contiguous census tracts in Dallas County, which comprises a portion of the Dallas-Plano-Irving MD and has a total population of 2,667,720. According to the 2015 ACS US Census, the assessment area contained 107 low-income, 187 moderate-income, 110 middle-income, 120 upper-income census tracts, and 5 census tracts with no income designation.

CRA requires each financial institution to define one or more assessment areas within which examiners will evaluate its performance. North Dallas Bank & Trust delineated portions of Dallas County within the Dallas MD AA assessment area.

12 CFR 345.41(e) Limitations on the delineation of an assessment area. *Each bank's assessment area(s):*

*(1) Must consist only of whole geographies;*

*(2) May not reflect illegal discrimination;*

*(3) May not arbitrarily exclude low- or moderate-income geographies, taking into account the bank's size and financial condition; and*

*(4) May not extend substantially beyond an MSA boundary or beyond a state boundary unless the assessment area is located in a multistate MSA. If a bank serves a geographic area that extends substantially beyond a state boundary, the bank shall delineate separate assessment areas for the areas in each state. If a bank serves a geographic area that extends substantially beyond an MSA boundary, the bank shall delineate separate assessment areas for the areas inside and outside the MSA.*

[https://www.ecfr.gov/current/title-12/chapter-III/subchapter-B/part-345/subpart-C/section-345.41#p-345.41\(e\)](https://www.ecfr.gov/current/title-12/chapter-III/subchapter-B/part-345/subpart-C/section-345.41#p-345.41(e))

North Dallas Bank & Trust does arbitrarily exclude high minority and low to moderate-income areas in Southern Dallas.<sup>1</sup> North Dallas Bank & Trust does Not include Southern Dallas (City of Dallas & Dallas County) in their assessment area.

#### **Southern Dallas Zip Codes (LMI/High Minority Areas)**

75203, 75207, 75208, 75210, 75211, 75212, 75215, 75216, 75217, 75223, 75224, 75226, 75227, 75228, 75232, 75233, 75236, 75237, 75241, 75249, 75253

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<sup>1</sup> “<https://www.justice.gov/crt/case-document/report-and-recommendation-united-states-v-kleinbank-d-minn>

<https://www.justice.gov/crt/case-document/order-entering-settlement-agreement-and-agreed-order-united-states-v-first>

<https://www.justice.gov/crt/case-document/consent-order-united-states-v-union-savings-bank-and-guardian-savings-bank-sd-oh-0>



**The following section discuss demographic in the Southern Dallas area.**

- Southern Dallas is home to 43% of all Dallas residents in just 57% of the city's land area.
- Of the 560,000 residents of neighborhoods in southern Dallas, approximately 38% live below poverty - roughly 9% higher than the City's overall poverty rate of 29%.
- Overall, 56% of Dallas residents living below poverty live in the southern neighborhoods of Dallas.
- *The City of Dallas is a unique place. There is a difference between "South Dallas" and "Southern Dallas".*
- *The Southern Sector of Dallas (Southern Dallas) is commonly defined as those areas south of Interstate 30.*
- *The Southern Dallas is 196.7 total square miles. 45% of the City's residents live in Southern Dallas (91% of the residents are minorities in Southern Dallas).*

### **Redlining Violates the Fair Housing Act and the Equal Credit Opportunity Act**

The federal financial regulators have long recognized that redlining violates the fair lending laws, including in the following policy documents:

- 1994 Interagency Policy Statement on Discrimination in Lending: Redlining refers to the illegal practice of refusing to make residential loans or imposing more onerous terms on any loans made because of the predominant race, national origin, etc., of the residents of the neighborhood in which the property is located. Redlining violates both the Fair Housing Act and the Equal Credit Opportunity Act.
- 2009 Interagency Fair Lending Examination Procedures: Redlining is a form of illegal disparate treatment in which a lender provides unequal access to credit, or unequal terms of credit, because of the race, color, national origin, or other prohibited characteristic(s) of the residents of the area in which the credit seeker resides or will reside or in which the residential property to be mortgaged is located.

Courts have repeatedly recognized that redlining is a violation of the Fair Housing Act and the Equal Credit Opportunity Act. *See, e.g., Ring v. First Interstate Mortgage, Inc.*, 984 F. 2d 924 (8th Cir. 1993); *Hirschfeld v. Metlife Bank, N.A.*, 2012 WL 3240669 (E.D.N.Y. July 31, 2012); *JAT, Inc. v. Nat'l City Bank of Midwest*, 460 F. Supp. 2d 812, 819-20 (E.D. Mich. 2006); *Hargraves v. Capital City Mortg. Corp.*, 140 F. Supp. 2d 7, 21 (D.D.C. 2000); *Milton v. Bancplus Mortgage Corp.*, 1996 WL 197532 (N.D. Ill. Apr. 19, 1996); *Old West End Ass'n v. Buckeye Federal Sav. & Loan*, 675 F. Supp. 1100 (N.D. Ohio 1987); *Harrison v. Otto G. Heinzerth Mortg. Co.*, 430 F. Supp. 893 (N.D. Ohio 1977); *Laufman v. Oakley Bldg. & Loan Co.*, 408 F. Supp. 489 (S.D. Ohio 1976).

Since the 1990s, the DOJ has litigated multiple court-approved settlements citing redlining as a violation of the Fair Housing Act and the Equal Credit Opportunity Act.

### **Redlining Violates the Fair Housing Act**

The Fair Housing Act, 42 U.S.C. § 3601, et seq., prohibits discrimination in housing and "residential real estate-related transactions" on the basis of race, color, national origin, sex, religion, familial status, or

disability. A “residential real estate-related transaction” includes making loans or providing other financial assistance for purchasing, constructing, improving, repairing, or maintaining a dwelling. 42 U.S.C. § 3605(b)(1)(A). In addition, the U.S. Department of Housing and Urban Development (“HUD”) has the authority to promulgate regulations to implement the Fair Housing Act, which can be found at 24 C.F.R. Part 100.

Redlining is prohibited under the following provisions of the Fair Housing Act (in relevant part) and its implementing regulation:

- It shall be unlawful for any person or other entity whose business includes engaging in residential real estate-related transactions to discriminate against any person in making available such a transaction, or in the terms or conditions of such a transaction, because of race, color, or national origin.
  - *Fair Housing Act: 42 U.S.C. § 3605(a).*
  - *Regulations: 24 C.F.R. §§ 100.110(b), 100.120(a)-(b).*
- It shall be unlawful to discriminate against any person in the terms, conditions, or privileges of the sale or rental of a dwelling, or in the provision of services or facilities in connection therewith, because of race, color, or national origin.
  - *Fair Housing Act: 42 U.S.C. § 3604(b).*
  - *Regulations: 24 C.F.R. §§ 100.50(b)(2), 100.65.*
- It shall be unlawful to refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, or national origin.
  - *Fair Housing Act: 42 U.S.C. § 3604(a).*
  - *Regulation: 24 C.F.R. § 100.50(b)(3).*
- It shall be unlawful to make, print, or publish, or cause to be made, printed, or published any notice, statement, or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, or national origin, or an intention to make any such preference, limitation, or discrimination.
  - *Fair Housing Act: 42 U.S.C. § 3604(c).*
  - *Regulation: 24 C.F.R. § 100.50(b)(4).*

### **Redlining Violates the Equal Credit Opportunity Act**

The Equal Credit Opportunity Act (“ECOA”), 15 U.S.C. § 1691, et seq., prohibits a creditor from discriminating in any aspect of a credit transaction on the basis of race, color, national origin, sex, religion, marital status, age, because all or part of the applicant’s income derives from any public assistance program, or because of the applicant’s exercise in good faith of any right under the Consumer Credit Protection Act. ECOA applies to any extension of credit, including mortgage loans and small business loans. 15 U.S.C. § 1691a(d). In addition, the Consumer Financial Protection Bureau (“CFPB”) has the authority to promulgate regulations to implement the ECOA, which is known as “Regulation B” and can be found at 12 C.F.R. Part 1002.

Redlining is prohibited under the following provisions of the ECOA and its implementing regulation:

It shall be unlawful for any creditor to discriminate against any applicant, with respect to any aspect of a credit transaction, on the basis of race, color, or national origin. Equal Credit Opportunity Act, 15 U.S.C. § 1691(a)(1). Regulation: 12 C.F.R. § 1002.4(a).

- A creditor shall not make any oral or written statement, in advertising or otherwise, to applicants or prospective applicants that would discourage, on the basis of race, color, or national origin, a reasonable person from making or pursuing an application. Regulation: 12 C.F.R. § 1002.4(b). (See also Equal Credit Opportunity Act, 15 U.S.C. § 1691(a)(1)).
- ECOA and Regulation B prohibit discrimination on a “prohibited basis,” which includes on the basis of race, color, and national origin. 12 C.F.R. § 1002.2(z). The commentary to Regulation B clarifies that a creditor may not discriminate against persons associated with the applicant on a prohibited basis, including, for example, “because of the race of other residents in the neighborhood where the property offered as collateral is located.” 12 C.F.R. Part 1002, Supp. I, ¶ 2(z)-1.

### **Regulatory Framework: Bank Supervision and Enforcement**

Each of the federal financial regulators has the authority to examine and supervise the regulated financial institutions within its jurisdiction for compliance with the fair lending laws: the Fair Housing Act and ECOA.

ECOA requires the regulators refer matters to the Justice Department when a creditor is engaged in a pattern or practice of discrimination which violates ECOA.

### **Redlining Cases**

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<https://www.justice.gov/opa/pr/justice-department-announces-new-initiative-combat-redlining>

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<https://www.consumerfinance.gov/about-us/newsroom/cfpb-doj-order-trident-mortgage-company-to-pay-more-than-22-million-for-deliberate-discrimination-against-minority-families/>

*Cadence Bank Announces Settlement of Claims Made by U.S. Department of Justice and the Office of the Comptroller of the Currency*

<https://www.justice.gov/crt/case/united-states-v-cadence-bank>

### **Conclusion**

The CRA regulation is very clear — a finding that a bank failed to comply with laws on fair and responsible lending trumps otherwise satisfactory or even outstanding CRA performance. The CRA regulations specifically state that a rating will be "adversely affected by evidence of discriminatory or other illegal credit practices," including but not limited to violations of the Equal Credit Opportunity Act, the Fair Housing Act, the Home Ownership and Equity Protection Act, the Federal Trade Commission Act, the Real Estate Settlement Procedures Act, and the Truth in Lending Act.

North Dallas Bank & Trust's board and senior management failed to self-identify redlining risks and taken appropriate corrective action.

We would look forward to this case being reviewed and referred to the U.S. Department of Justice (DOJ) and the Consumer Financial Protection Bureau (CFPB).

Sincerely,

*James McGee*

James McGee  
President/Chair

[JMcGee@SouthernDallasProgress.com](mailto:JMcGee@SouthernDallasProgress.com)

Southern Dallas Progress Community Development Corporation





*Improving Lives, One Community at a Time*

July 14, 2023

Larry A. Miller  
North Dallas Bank & Trust Co.  
12900 Preston Road  
Dallas, TX 75230

Federal Deposit Insurance Corporation  
Dallas Regional Office  
1601 Bryan Street, 38th Floor  
Dallas, TX 75201

**RE: NOTICE BY NORTH DALLAS BANK AND TRUST REGARDING APPLICATION TO ESTABLISH A BRANCH**

Dear Federal Regulator,

The undersigned community organization is submitting this letter to Protest North Dallas Bank & Trust Co's Notice of Application to Establish a Branch. **We do not support the** application submitted by North Dallas Bank & Trust Co to establish a branch office at 671 State Street, Southlake, Texas 76092.

The passing of the 1977 Community Reinvestment Act aimed at reversing the practice of redlining when banks and the government would restrict credit in communities deemed "risky" — based on the race and background of that community's residents.

The Community Reinvestment Act (CRA), enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 195, is intended to encourage depository institutions to help meet the **credit needs** of the communities in which they operate, including low- and moderate-income (LMI) neighborhoods.

**Since 1961, North Dallas Bank & Trust has excluded several Low to Moderate Income Census Tracts from there assessment area map. Also, the census tracts excluded are majority minority.**

North Dallas Bank & Trust's exclusion of Southern Dallas' low to moderate income and majority minority neighborhoods from its CRA assessment area reduced credit availability, investments, lending and discouraged prospective applicants.

North Dallas Bank & Trust is not meeting the needs the needs of our community, which specifically includes low- and moderate-income neighbor located in Southern Dallas. North Dallas Bank & Trust *fails* to provide small business and/or consumer lending services in Southern Dallas' majority African American/Hispanic communities.

## **REDLINING CONERNS/ DESCRIPTION OF ASSESSMENT AREA**

Per Performance Evaluation:

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indicates any preference, limitation, or discrimination based on race, color, or national origin, or an intention to make any such preference, limitation, or discrimination.

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<https://www.justice.gov/opa/pr/justice-department-announces-actions-resolve-lending-discrimination-claims-against-evolve>

*CFPB, DOJ Order Trident Mortgage Company to Pay More Than \$22 Million for Deliberate Discrimination Against Minority Families*

<https://www.consumerfinance.gov/about-us/newsroom/cfpb-doj-order-trident-mortgage-company-to-pay-more-than-22-million-for-deliberate-discrimination-against-minority-families/>

*Cadence Bank Announces Settlement of Claims Made by U.S. Department of Justice and the Office of the Comptroller of the Currency*

<https://www.justice.gov/crt/case/united-states-v-cadence-bank>

## **Conclusion**

The CRA regulation is very clear — a finding that a bank failed to comply with laws on fair and responsible lending trumps otherwise satisfactory or even outstanding CRA performance. The CRA regulations specifically state that a rating will be "adversely affected by evidence of discriminatory or other illegal credit practices," including but not limited to violations of the Equal Credit Opportunity Act, the Fair Housing Act, the Home Ownership and Equity Protection Act, the Federal Trade Commission Act, the Real Estate Settlement Procedures Act, and the Truth in Lending Act.

North Dallas Bank & Trust's board and senior management failed to self-identify redlining risks and taken appropriate corrective action.

We would look forward to this case being reviewed and referred to the U.S. Department of Justice (DOJ) and the Consumer Financial Protection Bureau (CFPB).

Sincerely,

*James McGee*

James McGee  
President/Chair

[JMcGee@SouthernDallasProgress.com](mailto:JMcGee@SouthernDallasProgress.com)

Southern Dallas Progress Community Development Corporation

July 26, 2023

Federal Deposit Insurance Corporation  
Dallas Regional Office  
Attention: Kristie K. Elmquist, Regional Director  
600 North Pearl Street, Suite 700  
Dallas, Texas 75201

RE: CRA Protest Letter Relating to North Dallas Bank & Trust Co.  
Application to Establish a Branch in Southlake, Texas

Dear Ms. Elmquist:

This letter is in reference to the Community Reinvestment Act (CRA) protest filed by Southern Dallas Progress Community Development Corporation on July 14, 2023, concerning NDBT's application to establish a branch in Southlake, Texas.

The protest letter asserts, "Since 1961, North Dallas Bank & Trust has excluded several Low to Moderate Income Census Tracts from there [sic] assessment area map. Also, the census tracts excluded are majority minority."

NDBT maintains its CRA assessment area (AA) definition based on the bank's size and complexity to ensure it is equipped to meet the credit needs of the local community. This AA was historically defined as *the whole census tracts wholly within, tangent to, or bisected by, a 5 ½ mile radius of each banking center*. The AA definition is regularly reviewed and evaluated to ensure its continued appropriateness. In 2021, NDBT management performed an AA review using a forward-looking analysis of the bank's market and strategic plan. The evaluation resulted in a recommendation to change the delineation to include all of *Dallas and Collin Counties*, which are the two counties in which the bank operates. The NDBT Board approved this change, which is reflected in the CRA Public File and CRA regulatory reporting.

Further, NDBT executive management has been collaborating with the community engagement and marketing teams to ensure that the bank is prepared to incorporate all of Tarrant County into its CRA Program, as this is where the proposed Southlake branch will be located. Initial steps have included evaluating local community organizations as potential outreach partners and attending community events to learn more about the needs of the surrounding area.

The protest letter also states, "North Dallas Bank & Trust is not meeting the needs the needs [sic] of our community, which specifically includes low- and moderate-income neighbor [sic] located in Southern Dallas. North Dallas Bank & Trust *fails* to provide small business and/or consumer lending services in Southern Dallas' majority African American/Hispanic communities."

NDBT welcomes customers and loan applicants from all neighborhoods within the AA, and management evaluates for effectiveness not only lending activity, but also marketing and outreach initiatives. Since the 2021 AA expansion, a focus has been applied to ensuring that these initiatives incorporate all of the two county region, including Southern Dallas. Management has also been building non-profit relationships in the added portions of these counties and participating in community engagement events to fully understand the needs of the area.

Management applies information gained from these events to strengthen the impact and deepen lending penetration in low- and moderate-income (LMI) areas as well as in majority minority census tracts (MMCTs). A common theme has been decreased availability of affordable housing and mortgages within DFW. For many years, NDBT has offered the HomeStart mortgage program to LMI homebuyers or those wanting to refinance their home. In 2021, the bank launched a similar program, known as the Community Home Equity Loan, to LMI homeowners to provide funds for home improvement or other equity needs. Additionally, the bank recently joined the Dallas Homebuyer Assistance Program (DHAP) to complement these special purpose mortgage programs. To address the lack of affordable housing, NDBT bankers and lenders are actively seeking opportunities for housing construction projects in which the bank can participate. In 2022, NDBT originated \$15.9 million in community development loans that directly support affordable housing projects in Dallas County.

The bank's HMDA reportable lending to both in minority and lower income areas has steadily increased in recent years. In 2022, NDBT's originated HMDA loans within the AA and secured by properties in LMI CTs reached 21% and properties in MMCTs reached 47%. In the prior four years, these figures averaged 12% and 19%, respectively. It is also notable that this loan volume increased while the overall number of NDBT HMDA applications decreased during the last calendar year. Mid-2023 data shows that the bank is on pace to match 2022 HMDA originations in minority and LMI areas of the AA. This data supports the effectiveness of the bank's current outreach and marketing efforts in both MMCTs and LMI areas. NDBT will continue monitoring the results and pursuing new opportunities with the goal of increasing lending penetration across the AA, including Southern Dallas.

While we appreciate the interest and comments from Southern Dallas Progress Community Development Corporation, our historic performance confirms that NDBT supports the local community with a focus on all of Dallas and Collin Counties. Our management team is committed to dedicating the time and resources needed to continue outreach programs, build lasting relationships, and make a meaningful difference in the communities we serve. The proposed Southlake branch and corresponding expansion of NDBT's CRA AA will result in a greater impact of our outreach initiatives across the DFW area.

Sincerely,



Larry Miller  
President & Chief Executive Officer  
Chairman of the Board



Gina Brown, CRCM  
EVP & Enterprise Risk Manager

CC: Southern Dallas Progress Community Development Corporation



*Improving Lives, One Community at a Time*

August 2, 2023

Larry A. Miller  
North Dallas Bank & Trust Co.  
12900 Preston Road  
Dallas, TX 75230

Federal Deposit Insurance Corporation  
Dallas Regional Office  
1601 Bryan Street, 38th Floor  
Dallas, TX 75201

**RE: NOTICE BY NORTH DALLAS BANK AND TRUST REGARDING APPLICATION TO ESTABLISH A BRANCH**

Dear Federal Regulator,

The undersigned community organization is submitting this letter in response to the letter dated July 26, 2023, received from North Dallas Bank & Trust. North Dallas Bank & Trust failed to provide any lending data for Southern Dallas which it illegally redlined **from 1961 to 2021**.

North Dallas Bank & Trust arbitrarily excluded low- or moderate-income geographies in Dallas County **for 60 years, specifically Southern Dallas**. North Dallas Bank & Trust's assessment area map reflected illegal discrimination by excluding areas in Southern Dallas which are LMI majority-minority census tracts.

**As mentioned in my previous letter dated July 14, 2023, North Dallas Bank & Trust is not meeting the needs of our community, which specifically includes low- and moderate-income neighborhoods located in Southern Dallas.**

**Southern Dallas Zip Codes (LMI/High Minority Areas)**

75203, 75207, 75208, 75210, 75211, 75212, 75215, 75216, 75217, 75223, 75224, 75226, 75227, 75228, 75232, 75233, 75236, 75237, 75241, 75249, 75253

## **Redlining Southern Dallas/ Illegal Discrimination**

From 1961 to 2021 (60 years), North Dallas Bank & Trust engaged in unlawful redlining by acting to meet the credit needs of majority White Middle to Upper Income neighborhoods in the Dallas-Fort Worth Metropolitan Statistical Area ("DFW MSA" or "MSA") while avoiding the credit needs of Low to Moderate census tracts in Southern Dallas. Also, these census tracts were majority minority.

## **Products available for the Underserved/Minority Communities**

Access to affordable credit is a key component of an individual's ability to cultivate a strong financial position and participate fully in the DFW economy. The Equal Credit Opportunity Act of 1974 was passed to protect all consumers, yet the effects of the discrimination endure today.

North Dallas Bank & Trust fails to offer any solutions for the 163,000 unbanked/underbanked residents in the DFW MSA.

- [https://household-survey.fdic.gov/place-data?type=msa&area=Dallas\\_Fort\\_Worth\\_Arlington\\_TX](https://household-survey.fdic.gov/place-data?type=msa&area=Dallas_Fort_Worth_Arlington_TX)
  - The underbanked/unbanked information is available on the FDIC website.
- <https://www.aba.com/about-us/press-room/press-releases/aba-urges-americas-banks-to-offer-bank-on-certified-accounts>

North Dallas Bank & Trust does not have any special-purpose credit programs to address disparities in small business & mortgage lending in underserved high minority communities like Southern Dallas.

- <https://www.consumerfinance.gov/about-us/newsroom/consumer-financial-protection-bureau-issues-advisory-opinion-to-help-expand-fair-equitable-and-nondiscriminatory-access-to-credit/>
- [https://www.hud.gov/sites/dfiles/GC/documents/Special\\_Purpose\\_Credit\\_Program\\_OGC\\_guidance\\_12-6-2021.pdf](https://www.hud.gov/sites/dfiles/GC/documents/Special_Purpose_Credit_Program_OGC_guidance_12-6-2021.pdf)
- [12 CFR § 202.8 - Special purpose credit programs.](#)
  - <https://www.ffiec.gov/PDF/fairlend.pdf>

## **Activities under the CRA since 2020 CRA Performance Evaluation**

North Dallas Bank & Trust failed to describe any significant CRA initiatives undertaken, particularly with respect to credit and deposit products and retail banking services targeted toward low- and moderate-income geographies, African American/Hispanic geographies, and individuals, identifying key elements of the products and services, the approximate date introduced, and results achieved to date.

North Dallas Bank & Trust failed to provide any details current community outreach and marketing efforts to residents and businesses throughout Bank's low-income census tracts, moderate-income census tracts, and major minority census tracts, specifically in Southern Dallas.



**North Dallas Bank & Trust Dallas County Bank Locations:**

12900 Preston Rd Dallas, TX 75230, Date Established 03/20/1961; Located in an upper income census tract and in a white majority community (MSA-State-County-Tract: 19124-48-113-0132.01).

7660 N Macarthur Blvd Irving, TX 75063, Date Established 10/21/1996; Located in an upper income census tract (MSA-State-County-Tract: 19124-48-113-0141.24).

5150 Keller Springs Rd Dallas, TX 75248, Date Established 12/20/2004; Located in a middle-income census tract and in a white majority community (MSA-State-County-Tract: 19124-48-113-0136.20).

3900 Preston Rd Plano, TX 75093, Date Established 08/22/1994; Located in an upper income census tract and in a white majority community (MSA-State-County-Tract: 19124-48-085-0316.76).

7359 Preston Rd Frisco, TX 75034, Date Established 04/01/1999; Located in a moderate-income census tract and in a white majority community (MSA-State-County-Tract: 19124-48-085-0304.09).

671 State Street, Southlake, Texas 76092; **Proposed New Location;** Located in an upper income census tract and in a white majority community (MSA-State-County-Tract: 23104-48-439-1139.56).

**REDLINING CONCERNS/ DESCRIPTION OF ASSESSMENT AREA**

From 1961 to 2021 (60 years) North Dallas Bank & Trust arbitrarily excluded high minority and low to moderate-income areas in Southern Dallas.<sup>1</sup> North Dallas Bank & Trust did **Not** include Southern Dallas (City of Dallas & Dallas County) in their assessment area.

**Per 2020 Performance Evaluation:**

*CRA requires each financial institution to define one or more assessment areas within which examiners will evaluate its performance. NDBT delineated portions of the Dallas-Plano-Irving Metropolitan Division (Dallas MD AA) as their assessment area. The bank reasonably defined its assessment area to meet CRA requirements. The following sections discuss demographic and economic information for the assessment area.*

*The Dallas MD AA contains 346 census tracts in portions of Collin, Dallas, and Denton Counties. These counties comprise three of the seven counties in the Dallas MD. According to the 2015 American Community Survey (ACS) Census Data, the assessment area contained 33 low-income, 57 moderate-income, 75 middle-income, 178 upper-income, and 3 census tracts with no income designation. Since the*

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<sup>1</sup> “<https://www.justice.gov/crt/case-document/report-and-recommendation-united-states-v-kleinbank-d-minn>  
<https://www.justice.gov/crt/case-document/order-entering-settlement-agreement-and-agreed-order-united-states-v-first>  
<https://www.justice.gov/crt/case-document/consent-order-united-states-v-union-savings-bank-and-guardian-savings-bank-sd-oh-0>

*prior evaluation, the assessment area remained stable. As noted previously, the bank maintains five full-service locations in this assessment area.*

To clarify, the Dallas MD AA consists of 529 contiguous census tracts in Dallas County, which comprises a portion of the Dallas-Plano-Irving MD and has a total population of 2,667,720. According to the 2015 ACS US Census, the assessment area contained 107 low-income, 187 moderate-income, 110 middle-income, 120 upper-income census tracts, and 5 census tracts with no income designation.

CRA requires each financial institution to define one or more assessment areas within which examiners will evaluate its performance. North Dallas Bank & Trust delineated portions of Dallas County within the Dallas MD AA assessment area.

12 CFR 345.41(e) Limitations on the delineation of an assessment area. *Each bank's assessment area(s):*

*(1) Must consist only of whole geographies;*

*(2) May not reflect illegal discrimination;*

*(3) May not arbitrarily exclude low- or moderate-income geographies, taking into account the bank's size and financial condition; and*

*(4) May not extend substantially beyond an MSA boundary or beyond a state boundary unless the assessment area is located in a multistate MSA. If a bank serves a geographic area that extends substantially beyond a state boundary, the bank shall delineate separate assessment areas for the areas in each state. If a bank serves a geographic area that extends substantially beyond an MSA boundary, the bank shall delineate separate assessment areas for the areas inside and outside the MSA.*

[https://www.ecfr.gov/current/title-12/chapter-III/subchapter-B/part-345/subpart-C/section-345.41#p-345.41\(e\)](https://www.ecfr.gov/current/title-12/chapter-III/subchapter-B/part-345/subpart-C/section-345.41#p-345.41(e))

### **Per 2020 Performance Evaluation**

The Lending Test is rated Low Satisfactory.

[https://crapes.fdic.gov/publish/2020/18355\\_200713.PDF](https://crapes.fdic.gov/publish/2020/18355_200713.PDF)

### **Fair Lending Concerns**

I worked with the National Community Reinvestment Coalition (NCRC) to analyze the home purchase and small business lending of North Dallas Bank & Trust Co. in Dallas. This is what NCRC found.

- According to the Home Mortgage Disclosure Act (HMDA) data from 2017 to 2018, NDBT made a total of 46 in Dallas County. This data demonstrated that in 2019, 2 of NDBT's home loans were extended to Blacks (African Americans).
  - Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA
  - No loans were made in Southern Dallas
- According to the Home Mortgage Disclosure Act (HMDA) data from 2018 to 2019, NDBT made a total of 42 in Dallas County. This data demonstrated that in 2019, 2 of NDBT's home loans were extended to Blacks (African Americans).
  - Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA
  - No loans were made in Southern Dallas

- According to the Home Mortgage Disclosure Act (HMDA) data from 2019 to 2020, NDBT made a total of 64 in Dallas County. This data demonstrated that in 2020, 0 of NDBT's home loans were extended to Blacks (African Americans).
  - Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA
  - No loans were made in Southern Dallas
- According to the Home Mortgage Disclosure Act (HMDA) data from 2020 to 2021, NDBT made a total of 57 in Dallas County. This data demonstrated that in 2021, 0 of NDBT's home loans were extended to Blacks (African Americans).
  - Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA
  - No loans were made in Southern Dallas
- According to the Home Mortgage Disclosure Act (HMDA) data from 2021 to 2022, NDBT made a total of 30 in Dallas County. This data demonstrated that in 2022, 0 of NDBT's home loans were extended to Blacks (African Americans).
  - Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA
  - No loans were made in Southern Dallas
- Small Business Lending
  - SDPCDC compared North Dallas Bank & Trust Co. small business lending to other non-credit card small business lenders in Dallas and found that North Dallas Bank & Trust Co. trailed in lending to businesses with less than \$1 million in annual revenue.
  - Extremely low amount of small business loans were made in Southern Dallas from 2018 to 2022

### **Community Development Lending**

North Dallas Bank & Trust failed to provide the number of loans made in Southern Dallas compared to Northern Dallas.

### **Small Business/Commercial Lending**

North Dallas Bank & Trust failed to provide the number of loans made in Southern Dallas compared to Northern Dallas.

### **Mortgage Lending**

North Dallas Bank & Trust failed to provide the number of loans made in Southern Dallas compared to Northern Dallas.

### **Lack of Staff and Board Diversity**

North Dallas Bank & Trust does not have any African Americans and/or Hispanics on the Board of Directors.

<https://ndbt.com/about-us/leadership/>

North Dallas Bank & Trust does not have any African Americans and/or Hispanics on the DFW MSA Leadership Team.

<https://ndbt.com/about-us/leadership/>

North Dallas Bank & Trust does not have any Commercial Loans Officers in the DFW MSA that are African Americans and/or Hispanics.

<https://ndbt.com/business/commercial-loans/>

North Dallas Bank & Trust does not have any Mortgage Loans Officers in the DFW MSA that are African Americans.

<https://ndbt.com/personal/mortgages/>

North Dallas Bank & Trust does not participate in the Dodd-Frank Act Section 342(b)(2)(C) Diversity self-assessment.

<https://www.fdic.gov/about/diversity/analysisdsa.html>

***The DFW MSA is majority minority.***

**North Dallas Bank & Trust is not a member of any of the Minority Trade Organizations below:**

<https://regionalhca.org/>

<https://www.namcdfw.org/>

<https://blackcontractors.org/>

<https://aacatx.com/>

**North Dallas Bank & Trust is not a member of any of the Minority Chambers below:**

<https://dallasblackchamber.org/>

<https://arlingtonblackchamber.org/>

<https://fwmbcc.org/>

<https://fwhcc.org/>

<https://www.gdhcc.com/>

**North Dallas Bank & Trust is not a member of any of the Minority Real Estate Trade Organizations below:**

<https://www.narebdallas.org/>

<http://nahrepdallas.org/>

<https://www.varep.net/index.php/dallas-chapter>

<https://narebnorthtexas.org/nareb-north-texas>

<https://wcdallas.com/>

<https://realestatealliance.org/>

<https://www.areaa.org/dfw>

### **Conclusion**

North Dallas Bank & Trust (Acquired Access Bank) violated Equal Credit Opportunity Act (ECOA) and the Fair Housing Act (FHA) by excluding residents in Southern Dallas and failing to meet their credit needs.

North Dallas Bank & Trust 's board and senior management failed to self-identify redlining risks and taken appropriate corrective action from 1961 to 2021.

On behalf of the Southern Dallas County Community, would ask that you deny this application and refer this bank to the U.S. Department of Justice (DOJ) and the Consumer Financial Protection Bureau (CFPB). Sincerely,

*James McGee*

James McGee  
President/Chair

[JMcGee@SouthernDallasProgress.com](mailto:JMcGee@SouthernDallasProgress.com)

Southern Dallas Progress Community Development Corporation



*Improving Lives, One Community at a Time*

December 23, 2023

North Dallas Bank & Trust Co. (FDIC # 18355)  
12900 Preston Road  
Dallas, TX 75230

Federal Deposit Insurance Corporation  
Dallas Regional Office  
1601 Bryan Street, 38th Floor  
Dallas, TX 75201

**RE: COMPLAINT AGAINST NORTH DALLAS BANK AND TRUST CO**

Dear Federal Regulator,

The undersigned community organization is submitting this letter to file a complaint against American National Bank of Texas.

The passing of the 1977 Community Reinvestment Act aimed at reversing the practice of redlining when banks and the government would restrict credit in communities deemed “risky” — based on the race and background of that community’s residents.

The Community Reinvestment Act (CRA), enacted by Congress in 1977 (12 U.S.C. 2901) and implemented by Regulations 12 CFR parts 25, 228, 345, and 195, is intended to encourage depository institutions to help meet the **credit needs** of the communities in which they operate, including low- and moderate-income (LMI) neighborhoods.

North Dallas Bank & Trust is not meeting the credit needs of our community, which specifically includes low- and moderate-income neighbor located in Southern Dallas.

**Southern Dallas Zip Codes (LMI/High Minority Areas)**

75203, 75207, 75208, 75210, 75211, 75212, 75215, 75216, 75217, 75223, 75224, 75226, 75227, 75228, 75232, 75233, 75236, 75237, 75241, 75249, 75253

**North Dallas Bank & Trust Dallas County Bank Locations:**

12900 Preston Rd Dallas, TX 75230; Located in an upper-income census tract and in a white majority community. MSA-State-County-Tract: 19124-48-113-0132.01

7660 N Macarthur Blvd Irving, TX 75063; Located in an upper-income census tract. MSA-State-County-Tract: 19124-48-113-0141.24

5150 Keller Springs Rd Dallas, TX 75248; Located in a middle-income census tract and in a white majority community. MSA-State-County-Tract: 19124-48-113-0136.20

North Dallas Bank & Trust failed to open a banking branch at the following available location in Southern Dallas:

3701 S Walton Walker Blvd Dallas, TX 75236; Location in a Moderate-Income census tract and in a majority minority community. MSA-State-County-Tract: 19124-48-113-0165.34

**Community Credit Needs Assessment**

North Dallas Bank & Trust failed to conduct a Community Credit Needs Assessment for majority-Black and Hispanic census tracts within the DFW MSA, specifically Southern Dallas.

*A Community Credit Needs Assessment is a research-based market study to help a lender identify the needs for financial services in an area.*

*This assessment should include the following information about majority-Black and Hispanic census tracts within Covered Lending Area: (1) an evaluation (to include market research and interviews) of residential mortgage credit needs and current lending opportunities available in the area; (2) recent demographic and socioeconomic data; (3) potential strategies for North Dallas Bank & Trust to provide residential mortgage lending services in these census tracts; (4) a review of loan products offered by other lenders and their success in the market; (5) an overview of federal, state, and local programs that are available to residents seeking and obtaining residential mortgage loans;*

**Community Development Partnership Program**

North Dallas Bank & Trust does not have a written description of how proposed partnership(s) will be used to meet the credit needs identified in the Community Credit Needs Assessment.

**Products available for the Underserved/Minority Communities**

Access to affordable credit is a key component of an individual's ability to cultivate a strong financial position and participate fully in the DFW economy. The Equal Credit Opportunity Act of 1974 was passed to protect all consumers, yet the effects of the discrimination endure today.

North Dallas Bank & Trust failed to offer any solutions for the 163,000 unbanked/underbanked residents in the DFW MSA.

- [https://household-survey.fdic.gov/place-data?type=msa&area=Dallas\\_Fort\\_Worth\\_Arlington\\_TX](https://household-survey.fdic.gov/place-data?type=msa&area=Dallas_Fort_Worth_Arlington_TX)
  - The underbanked/unbanked information is available on the FDIC website.

North Dallas Bank & Trust failed to Adopt Bank On standards.

- <https://joinbankon.org/accounts/>
- <https://2wvkof1mfraz2etgea1p8kiy-wpengine.netdna-ssl.com/wp-content/uploads/2020/10/Bank-On-National-Account-Standards-2021-2022.pdf>
- <https://www.aba.com/about-us/press-room/press-releases/aba-urges-americas-banks-to-offer-bank-on-certified-accounts>

North Dallas Bank & Trust does not have any special-purpose credit programs to address disparities in small business & mortgage lending in underserved high minority communities like Southern Dallas.

- <https://www.consumerfinance.gov/about-us/newsroom/consumer-financial-protection-bureau-issues-advisory-opinion-to-help-expand-fair-equitable-and-nondiscriminatory-access-to-credit/>
- [https://www.hud.gov/sites/dfiles/GC/documents/Special\\_Purpose\\_Credit\\_Program\\_OGC\\_guidance\\_12-6-2021.pdf](https://www.hud.gov/sites/dfiles/GC/documents/Special_Purpose_Credit_Program_OGC_guidance_12-6-2021.pdf)
- [12 CFR § 202.8 - Special purpose credit programs.](#)
  - <https://www.ffiec.gov/PDF/fairlend.pdf>

North Dallas Bank & Trust fails to offer Credit Builder Loans or Credit Builder Loans to help Rebuild Southern Dallas LMI residents' Credit History.

- <https://www.dallasfed.org/cd/cct/18cctdallas>

### **Activities under the CRA since the most recent CRA Performance Evaluation**

North Dallas Bank & Trust failed to describe any significant **Southern Dallas CRA initiatives** undertaken, particularly with respect to credit and deposit products and retail banking services targeted toward low- and moderate-income geographies, African American/Hispanic geographies, and individuals, identifying key elements of the products and services, the approximate date introduced, and results achieved to date.

North Dallas Bank & Trust failed to provide any details current community outreach and marketing efforts to residents and businesses throughout Bank's low-income census tracts, moderate-income census tracts, and major minority census tracts, **specifically in Southern Dallas.**

### **Fair Lending Concerns**

I worked with the National Community Reinvestment Coalition (NCRC) to analyze the home purchase and small business lending of North Dallas Bank & Trust in Dallas. This is what NCRC found.

- According to the Home Mortgage Disclosure Act (HMDA) data from 2017 to 2018, NORTH DALLAS BANK & TRUST made a total of **2 home loans to Blacks (African Americans).**
  - Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA
  - No loans were made in Southern Dallas
- According to the Home Mortgage Disclosure Act (HMDA) data from 2018 to 2019, NORTH DALLAS BANK & TRUST made a total of **0 home loans to Blacks (African Americans).**



- Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA
- No loans were made in Southern Dallas
- According to the Home Mortgage Disclosure Act (HMDA) data from 2019 to 2020, NORTH DALLAS BANK & TRUST made a total of 0 home loans to Blacks (African Americans).
  - Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA
  - No loans were made in Southern Dallas
- According to the Home Mortgage Disclosure Act (HMDA) data from 2020 to 2021, NORTH DALLAS BANK & TRUST made a total of 0 home loans to Blacks (African Americans).
  - Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA
  - No loans were made in Southern Dallas
- According to the Home Mortgage Disclosure Act (HMDA) data from 2021 to 2022, NORTH DALLAS BANK & TRUST made a total of 0 home loans to Blacks (African Americans).
  - Made a smaller percentage of HMDA-reportable residential mortgage loans in majority-Black and Hispanic neighborhoods compared to its peers in the DFW MSA
  - No loans were made in Southern Dallas
- Small Business Lending
  - SDPCDC compared North Dallas Bank & Trust small business lending to other non-credit card small business lenders in Dallas and found that North Dallas Bank & Trust trailed in lending to businesses with less than \$1 million in annual revenue from 2017 to 2022.
  - Extremely low amount of small business loans were made in Southern Dallas

### **Equal Credit Opportunity Act (ECOA) and Fair Housing Act (FHA)**

North Dallas Bank & Trust violates Equal Credit Opportunity Act (ECOA) and the Fair Housing Act (FHA) by discriminating against African Americans and other minority consumers. The Equal Credit Opportunity Act (ECOA) prohibits lenders from discriminating based on race and other characteristics.

In terms of the discrimination, we assert that North Dallas Bank & Trust does engage in the following:

- All North Dallas Bank & Trust branches are in white-majority neighborhoods, compared to having none in majority-minority neighborhoods.
- North Dallas Bank & Trust's marketing initiatives showed a significant lower level of marketing efforts toward minority areas and media/intermediaries that tend to reach minority areas when compared to majority-white areas.
- Does not employ any African American mortgage or commercial loan officers in the DFW MSA
- North Dallas Bank & Trust significantly underperformed its "peer lenders" in generating loan applications from majority-Black and Hispanic neighborhoods;

- The geographic distribution of loans from 2017 through 2022 is poor, with a small number of loans in low-income areas that are not proportional to the number of households in Southern Dallas

Regulation B, the ECOA's implementing regulation, provides that a creditor shall not make any oral or written statement, in advertising or otherwise, to applicants or prospective applicants that would discourage on a prohibited basis a reasonable person from making or pursuing an application. But the ECOA itself does not set forth such a prohibition.

### **North Dallas Bank & Trust lacks Product Innovation and Flexibility**

Failed to invest in BIPOC Small Business Accelerator – People Fund

[https://peoplefund.org/bipoc-business-accelerator/?gclid=Cj0KCQjwuuKXBhCRARIsAC-gM0iouy3e3IN66yehV5YQ25VcHQY7uV7DoK9WgkXcZ3VzRzsXo2iZWlkaAjXUEALw\\_wcB](https://peoplefund.org/bipoc-business-accelerator/?gclid=Cj0KCQjwuuKXBhCRARIsAC-gM0iouy3e3IN66yehV5YQ25VcHQY7uV7DoK9WgkXcZ3VzRzsXo2iZWlkaAjXUEALw_wcB)

Failed to form a Subsidiary Community Development Corporation

<https://www.occ.gov/topics/consumers-and-communities/community-affairs/resource-directories/public-welfare-investments/formation-of-subsiary-cdc.html#q3>

Failed to invest in Growth by NCRC

<https://growthbyncrc.com/>

Failed to invest in Dallas College Bankwork\$ Program.

<https://www.dallascollege.edu/cd/ce/training/business-mgmt/pages/bankworks.aspx>

### **Redlining Southern Dallas/ Illegal Discrimination**

From 1961 to 2023 (62 years), North Dallas Bank & Trust engaged in unlawful redlining by acting to meet the credit needs of majority White Middle to Upper Income neighborhoods in the Dallas-Fort Worth Metropolitan Statistical Area ("DFW MSA" or "MSA") while avoiding the credit needs of Low to Moderate census tracts in Southern Dallas. Also, these census tracts were majority minority.

### **Community Development Lending**

North Dallas Bank & Trust made a significant lower level of Community Development loans in minority areas (Southern Dallas) when compared to majority-white areas (Northern Dallas).

### **Small Business/Commercial Lending**

North Dallas Bank & Trust made a significant lower level of Small Business/Commercial loans in minority areas (Southern Dallas) when compared to majority-white areas (Northern Dallas).

### **Mortgage Lending**

North Dallas Bank & Trust made a significant lower level of mortgage loans in minority areas (Southern Dallas) when compared to majority-white areas (Northern Dallas).

**Lack of Staff and Board Diversity**

North Dallas Bank & Trust does not have any African Americans on the Board of Directors.

<https://www.wsj.com/market-data/quotes/NODB/company-people>

<https://www.globenewswire.com/en/news-release/2021/06/23/2252140/0/en/North-Dallas-Bank-Trust-Co-Elects-A-New-Board-Member.html>

North Dallas Bank & Trust does not have any African Americans on the DFW MSA Leadership Team.

<https://ndbt.com/about-us/leadership/>

North Dallas Bank & Trust does not have any Mortgage Loans Officers in the DFW MSA that are African Americans.

<https://ndbt.com/personal/mortgages/>

North Dallas Bank & Trust does not participate in the Dodd-Frank Act Section 342(b)(2)(C) Diversity self-assessment.

<https://www.fdic.gov/about/diversity/pdf/rtc32919.pdf>

North Dallas Bank & Trust failed to share this diversity opportunity with staff.

<https://www.mba.org/industry-resources/diversity-equity-and-inclusion/path-to-diversity-scholarship-program>

**North Dallas Bank & Trust is not a member of any of the Minority Trade Organizations below:**

<https://www.namcdfw.org/>

<https://blackcontractors.org/>

**North Dallas Bank & Trust is not a member of any of the Minority Chambers below:**

<https://dallasblackchamber.org/>

<https://arlingtonblackchamber.org/>

**North Dallas Bank & Trust is not a member of any of the Minority Real Estate Trade Organizations below:**

<https://www.varep.net/index.php/dallas-chapter>

<https://narebnorthtexas.org/nareb-north-texas>

<https://wcdallas.com/>

<https://www.narebdallas.org/>

## **Conclusion**

On behalf of the Southern Dallas Community, we asked that the Federal Reserve take the rare action of downgrading North Dallas Bank & Trust's CRA rating to "Needs Improve".

Sincerely,

*James McGee*

James McGee  
President/Chair

[JMcGee@SouthernDallasProgress.com](mailto:JMcGee@SouthernDallasProgress.com)

Southern Dallas Progress Community Development Corporation

## **Research on Dallas Community Needs**

*Dallas has a housing shortage of approximately 20,000 units.*

<https://dallascityhall.com/departments/housing-neighborhood-revitalization/DCH%20Documents/Adopted%20Housing%20Policy.pdf>

North Texas Regional Housing Assessment

<https://dhantx.com/report/north-texas-regional-housing-assessment/>

Dallas' Small Business Ecosystem Assessment

<https://www.dallasecocodev.org/DocumentCenter/View/2789/Dallas-Small-Business-Ecosystem-Report-PDF>

Report on Housing Affordability and Vulnerability in Dallas, Texas

<https://nalcab.org/nalcab-releases-report-on-housing-affordability-and-vulnerability-in-dallas-texas/>

*FINDING G: MINORITY OWNED BUSINESSES ACCESS TO CREDIT/CAPITAL ANALYSIS (CHAPTER 6)*

<https://dallascityhall.com/departments/public-affairs-outreach/DCH%20Documents/availability-disparity-study.pdf>

## **CRA Performance Evaluation**

# **PUBLIC DISCLOSURE**

September 5, 2023

## **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

North Dallas Bank & Trust Co.  
Certificate Number: 18355

12900 Preston Road  
Dallas, Texas 75230

Federal Deposit Insurance Corporation  
Division of Depositor and Consumer Protection  
Dallas Regional Office

600 North Pearl Street, Suite 700  
Dallas, Texas 75201

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 CRA RATING:** This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

PERFORMANCE LEVELS	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory		X	X
Low Satisfactory	X		
Needs to Improve			
Substantial Noncompliance			
* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.			

**The Lending Test is rated **Low Satisfactory**.**

- Lending levels reflect good responsiveness to assessment area credit needs.
- A high percentage of loans are made in the institution's assessment area.
- The geographic distribution of loans reflects adequate penetration throughout the assessment area.
- The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes.
- The institution exhibits a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices.
- The institution is a leader in making community development loans.
- The institution makes limited use of innovative and/or flexible lending practices in order to serve assessment area credit needs.



**The Investment Test is rated High Satisfactory.**

- The institution has a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.
- The institution exhibits good responsiveness to credit and community development needs.
- The institution occasionally uses innovative and/or complex investments to support community development initiatives.

**The Service Test is rated High Satisfactory.**

- Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area.
- To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of the bank's delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.
- Services (including, where appropriate, business hours) do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and/or individuals.
- The institution is a leader in providing community development services.

## **DESCRIPTION OF INSTITUTION**

North Dallas Bank & Trust Co. (NDBT), established in 1961, operates as a privately held independent bank, headquartered in Dallas, Texas. NDBT does not operate under a holding company structure, nor does it maintain any bank subsidiaries or any affiliate relationships. The bank received an overall "Satisfactory" rating at the prior Federal Deposit Insurance Corporation (FDIC) CRA Evaluation dated July 13, 2020, using the Federal Financial Institutions Examination Council's (FFIEC) Large Bank Procedures.

NDBT operates from five full-service locations and one limited-service mobile location throughout North Texas. Since the previous evaluation, the bank did not participate in any merger or acquisition activity nor did the bank open or close any branches. Branch operating hours are the same among the locations and typical for the financial industry.

The bank maintains a business focus on commercial and residential real estate lending. However, NDBT offers a variety of loans including consumer, commercial, residential home mortgage, and construction/development products. The bank also provides bank customers a variety of deposit services including checking accounts, savings accounts, certificates of deposit, individual retirement accounts, and investment management services. Other services include debit cards, deposit taking automated teller machines (ATMs), drive-thru facilities, telephone banking, online banking, and mobile banking.

As of the June 30, 2023 Consolidated Reports of Condition and Income, the bank reported total assets of approximately \$1.7 billion, total loans of \$1.0 billion, and total deposits of nearly \$1.4 billion. Since the prior evaluation, total assets grew by 16 percent, total loans increased by 50 percent, and total deposits grew by 12 percent. As presented in the following table, the mix of outstanding loans as of June 30, 2023, indicates commercial lending (Secured by Nonfarm Nonresidential Properties and Commercial and Industrial) represents the largest loan category at 62.7 percent of lending by dollar volume.

<b>Loan Portfolio Distribution as of 06/30/2023</b>		
<b>Loan Category</b>	<b>\$(000s)</b>	<b>%</b>
Construction, Land Development, and Other Land Loans	110,730	10.5
Secured by Farmland	2,767	0.3
Secured by 1-4 Family Residential Properties	223,046	21.1
Secured by Multifamily (5 or more) Residential Properties	33,250	3.3
Secured by Nonfarm Nonresidential Properties	609,096	57.7
<b>Total Real Estate Loans</b>	<b>978,890</b>	<b>35.2</b>
Commercial and Industrial Loans	53,087	5
Agricultural Production and Other Loans to Farmers	0	0.0
Consumer Loans	7,546	0.7
Obligations of State and Political Subdivisions in the U.S.	0	0.0
Other Loans	14,622	1.4
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
<b>Total Loans</b>	<b>1,054,145</b>	<b>100.0</b>
<i>Source: Reports of Condition and Income</i>		

Based on the information discussed in this section as well as other regulatory data, the institution's financial condition, size, product offerings, prior performance, and status of any legal impediments did not affect its ability to meet the credit needs of the assessment areas.

## **DESCRIPTION OF ASSESSMENT AREA**

The CRA requires each financial institution to define one or more assessment areas (AA) within which its CRA performance will be evaluated. NDBT's operates in two contiguous full counties in the State of Texas: Collin and Dallas Counties, part of the Dallas-Plano-Irving Metropolitan Division (Dallas MD).

According to the 2020 U.S. Census data, the Dallas MD AA includes all 865 census tracts that make up Collin and Dallas Counties. This reflects an increase from the 681 census tracts noted at the prior evaluation, based on 2015 American Community Survey (ACS) data, and included portions of Collin, Dallas, and Denton Counties. As noted above, NDBT operates five full-service branches and one limited-service mobile branch within the AA. The full-service branches operate in the cities of Dallas, Frisco, Irving, and Plano.

## **Economic and Demographic Data**

The Dallas MD AA's census tracts reflect the following income designations based on 2020 U.S. Census data: 109 low-, 242 moderate-, 222 middle-, and 276 upper-income census tracts, and 16 census tracts with no income designation. The Federal Emergency Management Agency (FEMA) declared this AA a major disaster area due to a severe winter storms and the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Dallas MD AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	865	12.6	28.0	25.7	31.9	1.8
Population by Geography	3,678,004	12.6	28.1	26.0	32.2	1.1
Housing Units by Geography	1,403,999	13.3	26.7	26.7	32.1	1.1
Owner-Occupied Units by Geography	705,424	7.1	23.6	27.7	41.3	0.4
Occupied Rental Units by Geography	594,063	19.8	30.3	25.9	22.1	1.9
Vacant Units by Geography	104,512	17.9	27.5	24.9	27.7	2.1
Businesses by Geography	644,370	5.6	17.2	30.7	45.4	1.1
Farms by Geography	8,751	4.4	17.5	30.6	46.6	0.9
Family Distribution by Income Level	869,150	25.1	17.9	18.4	38.7	0.0
Household Distribution by Income Level	1,299,487	24.9	17.6	17.6	39.9	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$88,315	Median Housing Value			\$262,850
			Median Gross Rent			\$1,248
			Families Below Poverty Level			9.3%
Source: 2020 U.S. Census and 2022 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.						

According to Moody's Analytics, the economic outlook and unemployment levels increased substantially in most areas across the nation starting in April 2020 due to the COVID-19 pandemic and some local government orders closing nonessential businesses. Job growth slowed in recent months and no longer reflects levels higher than the nation. Layoffs occurred in the core financial and service sectors in late 2022 and early 2023. The Bureau of Labor Statistics reflects a July 2023 unemployment rate of 4.1 percent for the Dallas-Fort Worth-Arlington Metropolitan Statistical Area, which falls lower than 4.5 percent reported for the State of Texas, but above the 3.5 percent national unemployment rate for the same period.

Services represent the largest portion of businesses in the area at 34.2 percent, followed by non-classifiable establishments at 17.4 percent, retail trade at 16.1 percent, and finance, insurance and real estate at 10.9 percent. According to D&B data, the major employers in Dallas-Plano-Irving TX

metropolitan area include Walmart Inc., American Airlines, Baylor Scott & White Health, and Lockheed Martin.

The following table presents the low-, moderate, middle-, and upper-income ranges based on the 2022 FFIEC-updated median family income of \$97,400 for the Dallas-Plano-Irving MSA AA.

Median Family Income Ranges				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥120%
Dallas-Plano-Irving, TX Median Family Income (19124)				
2022 (\$97,400)	<\$48,700	\$48,700 to <\$77,920	\$77,920 to <\$116,880	≥\$116,880
Source: FFIEC				

### **Competition**

The area contains a moderate level of competition from other chartered banks based on the area population, with each of the 836 offices from the 127 institutions serving on average approximately 4,399 people. NDBT ranks 21<sup>st</sup> in market share by capturing 0.5 percent of the area's deposits based on the June 30, 2022, FDIC Deposit Market Share Report. The top three institutions, with 194 branches, hold 65.2 percent of the deposits. In addition, a number of finance companies, credit unions, and mortgage companies operate in the area.

### **Community Contacts**

Examiners reviewed two existing community contact interviews with community members knowledgeable of the area's economic, demographic, and housing environment to help assess the area's current economic conditions, community credit needs, and potential opportunities for bank involvement in the area. The contacts represent nonprofit housing and community service organizations that target their services to lower income individuals and families, as well as depressed communities in the area.

The first contact noted that, although the Dallas area experienced solid growth, affordable housing, particularly in low- and moderate-income areas, continues to represent a primary need. The contact noted an escalation in the implementation of programs to increase mortgage lending and to provide access to home ownership. On a nationwide level, approximately 40 percent of individuals rent and 60 percent own; however, the Dallas area shows reversed percentages. The contact noted a heightened need to reach and provide general banking services for the unbanked. While banks offer small businesses access to capital, a lack of individuals that qualify for the capital exists. The contact further discussed a need for physical bank locations, with extended hours, particularly on Saturdays.

The second contact stated inflation costs remain a concern amongst small businesses in addition to the difficulties of meeting staffing needs. As a result, the contact noted an increase in family mergers and collaboration as well as generations choosing to combine their wealth and households by living together. Furthermore, the contact noted that although institutions offered an increase of

new home mortgage products, the products most needed in the communities include consumer products. Borrowers need access to consumer emergency loans and savings vehicles that accrue interest. Consumers want to have access to quick dollars and the ability to pay back quickly versus financing these activities on a credit card. Lastly, the contact noted significant opportunity exists for local financial institutions to create affordable mortgage products that expand homeownership opportunities and provide homeownership counseling.

### **Credit and Community Development Needs and Opportunities**

Considering information from the community contact, bank management, and demographic data, examiners determined the primary credit needs of the assessment area include small business and home mortgage lending. In addition, the community development needs of the area include affordable housing, revitalization/stabilization, and economic development.

## **SCOPE OF EVALUATION**

### **General Information**

This evaluation covers the period from the previous evaluation dated July 13, 2020, to the current evaluation dated September 5, 2023. To assess performance, examiners applied the FFIEC Large Institution CRA Examination Procedures, which include the Lending, Investment, and Service Tests. The appendices define each test's criteria. At this evaluation, examiners applied full-scope procedures to the Dallas MD AA, the bank's sole AA.

### **Activities Reviewed**

For the Lending Test, CRA Large Bank procedures require examiners to consider a bank's reported home mortgage, small business, and small farm loans, as well as all reported community development loans originated since the previous evaluation. Consequently, this evaluation considers total loans reported (inside and outside of the assessment area) either according to the Home Mortgage Disclosure Act (HMDA) or CRA data collection reporting requirements:

#### **Home Mortgage Loans (Total loans reported inside and outside of the assessment area)**

- 2020 - 180 loans totaling \$84,573,000
- 2021 - 153 loans totaling \$75,706,000
- 2022 - 98 loans totaling \$117,507,000

#### **Small Business Loans (Total loans reported inside and outside of the assessment area)**

- 2020 - 852 loans totaling \$77,775,000
- 2021 - 514 loans totaling \$58,569,000
- 2022 - 144 loans totaling \$33,587,000

Small Farm Loans (Total loans reported inside and outside of the assessment area)

- 2020 - 3 loans totaling \$333,000
- 2021 - 6 loans totaling \$842,000
- 2022 - 2 loans totaling \$715,000

Community Development Loans:

- July 13, 2020 – September 5, 2023: 51 loans totaling \$176,665,000

Based on the above data, small farm loans only account for 0.5 percent of the dollar volume of the total reported HMDA and CRA loans. Therefore, examiners did not analyze small farm lending since conclusions regarding the product would not materially affect any conclusions or ratings.

Since no trends exist between the different years' data that materially affect applicable conclusions or ratings, unless otherwise noted, this evaluation only presents the 2022 HMDA and 2021 small business data, the most recent years for which aggregate data exists for each product as of this evaluation date. However, examiners included 2020 through 2022 HMDA and CRA data in the Assessment Area Concentration discussion. Examiners compared the bank's small business lending to 2021 aggregate data as well as 2021 D&B data. Examiners compared the bank's HMDA lending to aggregate data in 2022 and 2020 U.S. Census data.

Additionally, examiners considered the bank's primary commercial lending focus, loan portfolio composition, and lending activity during the evaluation period. Consistent with the prior evaluation, examiners will place equal weight among the products when drawing conclusions.

The scopes for the Investment and Service Tests consider applicable current period community development activities, including qualified investments and community development services. The Investment Test's scope further encompasses all prior period qualified investments. Prior period qualified investments involve those purchased prior to the previous evaluation but still outstanding as of this evaluation's date. Examiners use the book value as of the current evaluation date for all prior period qualified investments.

For the Service Test, examiners reviewed the delivery systems for providing retail banking services, including branches and alternative delivery systems, and the impact of any branch openings/closings during the evaluation period. The review further evaluated retail banking products and services targeted toward low- and moderate-income individuals or small businesses and/or tailored to meet specific needs within the assessment area.

## **CONCLUSIONS ON PERFORMANCE CRITERIA**

### **LENDING TEST**

NDBT demonstrated a low satisfactory record for the bank as a whole regarding the Lending Test. Adequate performance for the geographic distribution and borrower profile hampered the bank's leadership level of community development lending to primarily support this conclusion. Additionally,

the bank makes limited use of innovative and/or flexible lending practices, demonstrated good responsiveness for lending activity, and made a majority of loans inside the bank's assessment area.

### **Lending Activity**

Lending levels reflect good responsiveness to assessment area credit needs. A good record regarding home mortgage lending hampered the excellent level of small business lending to support this conclusion. Examiners considered the bank's size, business strategy, and capacity relative to the assessment area's credit needs when arriving at this conclusion.

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

Home mortgage lending levels reflect good responsiveness to assessment area credit needs. For 2022, the bank originate 68 reportable home mortgage loans totaling approximately \$86.3 million inside its assessment area. NDBT captured a 0.1 percent market share based on the total number of home mortgage loans and a 0.2 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 190<sup>th</sup> out of 901 total lenders in the bank's assessment area. This ranking lands the bank in the top 21.1 percent of lenders reporting such loans in the bank's assessment area. The ranking considers the total number and dollar amount of loans made by each institution.

#### ***Small Business Loans***

Small business lending levels reflect excellent responsiveness to assessment area credit needs. For 2021, the bank originated 457 reportable small business loans totaling approximately \$51.4 million inside its assessment area. NDBT captured a 0.4 percent market share based on the total number of small business loans and a 1.1 percent market share of the total dollar volume of loans. This volume of activity ranks the bank 29<sup>th</sup> out of 288 total lenders in the bank's assessment area. The ranking lands the bank in the top 10.1 percent of lenders reporting such loans in the bank's assessment area. The ranking considers the total number and dollar volume of loans made by each institution.

### **Assessment Area Concentration**

A high percentage of loans are made in the institution's AA. High percentages of home mortgage and small business loans originated in the Dallas MD AA support this conclusion. Examiners considered the bank's asset size and office structure, as well as the loan categories reviewed relative to the areas' combined size and economy, when arriving at this conclusion.

As shown using the subtotal lines in the following table, the bank originated a high percentage of its home mortgage and small business loans by both measures, the percentages of the number and dollar volume, inside its Dallas MD AA.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollars Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2020	113	62.8	67	37.2	180	57,189	67.6	27,384	32.4	84,573
2021	120	78.3	33	21.6	153	60,307	79.7	15,400	20.3	75,706
2022	68	69.4	30	30.6	98	86,287	73.4	31,220	26.6	117,507
Subtotal	301	69.8	130	30.2	431	203,783	73.4	74,004	26.6	277,787
Small Business										
2020	775	91.0	77	9.0	852	71,458	91.9	6,317	8.1	77,775
2021	457	88.9	57	11.1	514	51,360	87.7	7,209	12.3	58,569
2022	121	84.0	23	16.0	144	25,448	75.8	8,139	24.2	33,587
Subtotal	1,353	89.6	157	10.4	1,510	77,337	78.9	20,665	21.1	98,002
Source: HMDA Reported Data; CRA Reported Data, due to rounding, totals may not equal 100.0%										

Considering the loan categories overall performances and weightings, the institution originated a high percentage of loans inside its assessment area.

### **Geographic Distribution**

The geographic distribution of loans reflects adequate penetration throughout the Dallas MD AA. Adequate record regarding both home mortgage and small business loans support this conclusion.

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

The geographic distribution of home mortgage loans reflects adequate penetration throughout the Dallas MD AA. Adequate performance in low- and moderate-income geographies supports this conclusion.

As seen in the table below, the bank's lending performance in low-income census tracts falls 3.7 percentage points below aggregate data, reflective of adequate performance. The table further shows the bank's level of lending in moderate-income census tracts slightly exceeds aggregate data by 0.4 percentage points, also reflecting an adequate level.



Geographic Distribution of Home Mortgage Loans Dallas MD AA						
Tract Income Level	% of Owner- Occupied Housing Units	Aggregate Performance % of #	#	%	\$(000s)	%
Low	7.1	6.6	2	2.9	510	0.6
Moderate	23.6	17.2	12	17.6	2,577	3.0
Middle	27.7	29.7	20	29.4	24,505	28.4
Upper	41.3	45.8	32	47.1	57,442	66.6
Not Available	0.4	0.7	2	2.9	1,253	1.5
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>68</b>	<b>100.0</b>	<b>86,287</b>	<b>100.0</b>
<i>Source: 2020 U.S. Census Data; 2022 HMDA Reported Data; HMDA Aggregate Data; Due to rounding, totals may not equal 100.0%.</i>						

### ***Small Business Loans***

The geographic distribution of small business loans reflects adequate penetration throughout the Dallas MD AA. Adequate performance in low-income geographies lifted the poor performance in moderate-income geographies to support this conclusion.

As seen in the table below, the bank's lending in low-income census tracts falls below the aggregate data figure by 2.0 percentage points, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank's lending level falls 8.8 percentage points below the aggregate data, reflecting a poor level.

Geographic Distribution of Small Business Loans Dallas MD AA						
Tract Income Level	% of Businesses	Aggregate Performance % of #	#	%	\$(000s)	%
Low	8.3	8.8	31	6.8	4,483	8.7
Moderate	19.4	21.1	56	12.3	8,606	16.8
Middle	23.8	22.1	99	21.7	10,245	19.9
Upper	47.5	47.0	267	58.4	27,385	53.3
Not Available	1.1	1.1	4	0.9	641	1.2
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>457</b>	<b>100.0</b>	<b>51,360</b>	<b>100.0</b>
<i>Source: 2021 D&amp;B Data; Bank Data; 2021 CRA Aggregate Data, "—" data not available. Due to rounding, totals may not equal 100.0%</i>						

### **Borrower Profile**

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail of different income levels and business customers of different sizes.

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

The distribution of home mortgage loans based on the borrowers' profiles reflects adequate performance in the Dallas MD AA. Adequate performance to low-income borrowers lifted the poor performance to moderate-income borrowers to support this conclusion.

As seen in the table below, the bank's lending to low-income borrowers lands slightly higher than the aggregate data by 0.1 percentage points, reflective of adequate performance. The table further shows that, moderate-income borrowers lending level falls 8.4 percentage points below the aggregate data, reflecting a poor level.

Distribution of Home Mortgage Loans by Borrower Income Level Dallas MD AA						
Borrower Income Level	% of Families	Aggregate Performance % of #	#	%	\$(000s)	%
Low	25.1	4.3	3	4.4	304	0.4
Moderate	17.9	12.8	3	4.4	1,395	1.6
Middle	18.4	17.6	4	5.9	601	0.7
Upper	38.7	44.8	36	52.9	23,541	27.3
Not Available	0.0	20.4	22	32.4	60,447	70.1
<b>Totals</b>	<b>100.0</b>	<b>100.0</b>	<b>68</b>	<b>100.0</b>	<b>86,287</b>	<b>100.0</b>
Source: 2020 U.S. Census Data; Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

### ***Small Business Loans***

The borrower profile distribution of small business loans within the Dallas MD AA reflects an adequate penetration among businesses of different sizes. In assessing performance regarding this factor, examiners considered the bank's participation in the SBA's PPP during the review period and took into account the unique circumstances affecting borrowers and banks resulting from the COVID-19 pandemic.

As seen in the table below, the bank's level of lending to small business with gross annual revenues of \$1 million or less in 2021 falls 19.1 percentage points below the aggregate level, initially reflecting poor performance.

Distribution of Loans to Small Businesses by Gross Annual Revenues Dallas MD AA											
Year	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2020	775	71,458	100.0	113,401	88.1	5.9	37.5	4.3	13.2	7.7	80.9
2021	457	51,360	100.0	128,144	88.1	23.4	42.5	3.9	22.1	8.0	54.5
2022	121	25,448	100.0	--	91.6	33.1	--	2.6	5.8	5.8	0.8
Source: 2020 to 2022 D&B Data; 01/01/2020 - 12/31/2022 Bank Data; 2020 and 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%											

However, the high intrusion of revenues not known highly affects the ability for examiners to provide a conclusion without consideration of contextual factors. As noted previously, the bank made a significant volume of PPP loans in response to the COVID-19 pandemic. PPP lending affected the bank's small business lending percentages in 2020 and 2021 to business with gross annual revenues of \$1 million or less, as the bank was not required to collect revenue data from the borrower. In 2020 and 2021, the bank originated 775 and 457 small business loans, of those totals 166 and 246 PPP loans were originated during those years, respectively. If information on PPP loans without collected revenues were removed from the 2020 and 2021 analysis, the bank's small business lending performance to businesses with gross annual revenues of \$1 million or less would increase to 34.3 percent and 50.9 percent, respectively, and reflective of adequate performance.

The following table shows the PPP lending by loan size for 2021. As shown, the majority, 86.9 percent, of the PPP loans originated in amounts of less than \$100,000, further supporting the adequate performance.

<b>Distribution of PPP Loans by Loan Size</b>				
<b>Gross Revenue Level</b>	<b>#</b>	<b>%</b>	<b>\$(000)</b>	<b>%</b>
< \$100,000	214	86.9	6,428	47.6
\$100,000 - \$249,999	20	8.1	2,947	21.8
\$250,000 - \$499,999	11	4.4	3,559	26.3
\$500,000 - \$1,000,000	1	0.4	567	4.2
<b>Total</b>	<b>246</b>	<b>100.0</b>	<b>13,501</b>	<b>100.0</b>
<i>Source: 2021 D&amp;B Data, Bank Data</i>				

### **Innovative or Flexible Lending Practices**

NDBT makes limited use of innovative and/or flexible lending practices in order to serve assessment area credit needs. The following highlights the bank's innovative and flexible lending practices. Management made efforts to serve the needs of the community through the following loan programs, the Homestart Program and the Community Home Equity Loan Program. Examiners also considered the bank's COVID-19 pandemic response, through the use of Paycheck Protection Program (PPP) loans, which further supports the overall conclusion. Examiners analyzed performance for this criterion at the institution level.

The bank funded the following since the previous evaluation:

- *HomeStart Program:* The bank maintained their HomeStart Program, which is designed to meet the needs of the low- and moderate-income borrowers in their assessment area, since the last evaluation. The program provides flexibility in the underwriting criteria, including allowing for higher loan-to-value ratios and alternate credit references. The program's parameters set an annually adjusted maximum income, which falls at the top of the moderate-income range, and a maximum home value. Lastly, loan officers provide counseling as part of the program, which provides information such as payment changes due to escrow or paying off the loan faster with additional principal payments. Currently, the

bank maintains a portfolio of four loans from this program valued slightly under \$1.0 million.

- *The Community Home Equity Loan Program:* The bank established this program as a means to help low- and moderate-income wage earners (as defined by the U.S. Housing and Urban Development “HUD”) obtain home equity financing by removing or lowering as many barriers as possible in a manner which is fiscally safe and sound for the bank. Minimum standards have been established in order to help ensure the continued success of the program. Not every applicant will meet these requirements, but they are structured so that many homebuyers in the bank’s market will qualify. This NDBT portfolio loan program is available for cash-out mortgages for any purpose, including for home improvements. Currently, the bank maintains a portfolio of one loan from this program valued slightly under \$100 thousand.
- *Small Business Administration (SBA) PPP Loans:* The bank demonstrated a willingness to meet the credit needs of businesses of varying sizes, including small businesses through originating SBA PPP loans, further supporting the bank’s innovative and flexible lending performance. The Coronavirus Aid Relief and Economic Security (CARES) Act, signed into law on March 27, 2020, established the temporary PPP. The SBA implemented the PPP, with support from the Department of the Treasury, which provided funding to encourage qualified businesses that met certain standards established by the SBA to retain employees through the COVID-19 pandemic and included loan forgiveness subject to certain conditions. NDBT funded 412 PPP loans totaling \$33.4 million during the evaluation period.

### **Community Development Loans**

NDBT is a leader in providing community development loans. Additionally, the institution exhibits a good record of serving the credit needs of the most economically disadvantaged areas of its assessment area, low-income individuals, and/or very small businesses, consistent with safe and sound banking practices. Excellent dollar volume combined with good responsiveness to credit and community development needs supports this conclusion. Examiners considered the dollar volume relative to the bank's capacity and credit needs within the Dallas MD AA.

The following table shows that since the previous evaluation, the bank granted 51 community development loans totaling \$179.7 million. The total dollar amount equates to 11.2 percent of average total assets of \$1.6 billion since the previous evaluation and 21.1 percent of average net loans of \$850.9 million since the previous evaluation. This reflects an increase in the prior evaluation’s 40 community development loans totaling \$65.8 million. The following table displays the bank’s community development lending by assessment area and purpose.

Community Development Lending by Assessment Area Institution										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Dallas MD AA	16	29,386	2	14,150	1	3,000	27	129,430	46	175,996
Statewide Activities	0	0	0	0	0	0	4	2,354	4	2,354
Nationwide Activities	0	0	0	0	0	0	1	1,345	1	1,345
<b>Total</b>	<b>16</b>	<b>29,386</b>	<b>2</b>	<b>14,150</b>	<b>1</b>	<b>3,000</b>	<b>32</b>	<b>133,129</b>	<b>51</b>	<b>179,665</b>
<i>Source: Bank Data</i>										

In addition, the community development loans exhibit good responsiveness to serving the credit needs of low-income individuals and/or small businesses. As detailed in the preceding table, 74.2 percent of the dollar volume of all community development loans revitalize or stabilize qualifying geographies while another 16.4 percent provide affordable housing. Furthermore, the bank did not ignore the remaining two categories as it provided loans to organizations that provide community services and for economic development purposes. All of these activities represent community development needs in the bank's assessment area. The following table presents the bank's community development lending by year and purpose.

Community Development Lending by Year Institution										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2020 (7/14 - 12/31)	6	12,000	1	2,150	0	0	6	21,033	13	35,183
2021	4	15,995	1	\$12,000	0	0	14	54,815	19	82,810
2022	6	1,391	0	0	1	3,000	11	53,862	18	58,253
2023 (9/5)	0	0	0	0	0	0	1	3,419	1	3,419
<b>Total</b>	<b>16</b>	<b>29,386</b>	<b>2</b>	<b>14,150</b>	<b>1</b>	<b>3,000</b>	<b>32</b>	<b>133,129</b>	<b>51</b>	<b>179,665</b>
<i>Source: Bank Data</i>										

The following points highlight examples of the bank's community development lending in the Dallas MD AA.

- **Affordable Housing:** In 2020, the bank originated one loan for \$11.0 million for the construction of a 171-unit multi-family housing complex. The property will be entirely low- and moderate-income designated with the maximum rents per unit listed for families at or below 80 percent of the median family income.
- **Community Service:** In 2021, the bank originated a loan for \$12.0 million for the construction of a new building for a community family center school that provides services to students. The school serves low- and moderate-income students, as 66.0 percent of the population are economically disadvantaged.

## INVESTMENT TEST

NDBT demonstrated a high satisfactory record for the bank as a whole regarding the Investment Test. The significant level of qualified investments paired with a good responsiveness to credit and community development needs primarily supports this conclusion. Additionally, the institution occasionally used innovative and/or complex investments to support community development initiatives.

### Investment and Grant Activity

The institution has a significant level of qualified community development investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors. As seen in the following table, the bank made use of 194 qualified investments totaling \$41.1 million, which includes donations of \$432 thousand and prior period investments of \$14.3 million. The total dollar amount equates to 2.6 percent of average total assets of \$1.6 billion since the previous evaluation, and 6.1 percent of average total securities of \$664.0 million for the same period, thereby reflecting a significant level. The following tables detail qualified investment activities including donations activities by assessment area, year, and purpose.

Qualified Investments by Assessment Area Institution										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Dallas MD AA	3	8,008	158	432	0	0	2	2,485	163	10,925
Statewide Activities	1	4,812	0	0	3	750	25	22,227	29	27,789
Regional Activities	0	0	0	0	0	0	2	940	2	2,425
<b>Total</b>	<b>4</b>	<b>12,820</b>	<b>158</b>	<b>432</b>	<b>3</b>	<b>750</b>	<b>29</b>	<b>25,652</b>	<b>194</b>	<b>41,139</b>
<i>Source: Bank Data</i>										

Qualified Investments by Year Institution										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	2	11,812	0	0	0	0	2	2,485	4	14,297
2020 (7/13-12/31)	1	1,485	0	0	1	250	19	11,957	21	13,692
2021	0	0	0	0	0	0	8	11,210	8	11,210
2022	1	1,008	0	0	2	500	0	0	3	1,508
2023 (1/1-6/30)	0	0	0	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>4</b>	<b>12,820</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>750</b>	<b>29</b>	<b>25,652</b>	<b>36</b>	<b>40,707</b>
Qualified Grants & Donations	0	0	158	432	0	0	0	0	158	432
<b>Total</b>	<b>4</b>	<b>12,820</b>	<b>158</b>	<b>432</b>	<b>3</b>	<b>750</b>	<b>29</b>	<b>25,652</b>	<b>194</b>	<b>41,139</b>
Source: Bank Data										

The following provides examples of qualified investments in the Dallas MD AA.

- **Affordable Housing:** In 2022, NDBT invested \$1.0 million in a mortgage pool held through CRA Partners, which offers several home mortgage programs that serve low- and moderate-income borrowers in the bank's AA.
- **Community Services:** During the review period, the bank provided 158 donations and grants to various community service organizations totaling \$432 thousand. Some of these donations and grants include organizations that provide services to low- and moderate-income children and homeless shelters.

In addition to the investments made directly in the Dallas MD AA, the following highlights examples of the statewide and regional qualified community development investment opportunities.

- **Affordable Housing:** In the prior evaluation period, the bank invested in Fannie Mae Mortgage-Backed Securities totaling \$4.8 million that provides affordable housing for low- and moderate-income individuals in the State of Texas.
- **Revitalize or Stabilize:** In 2021 and 2022, the bank invested in multiple municipal school bonds to support building infrastructure in low- to moderate-income neighborhoods within the State of Texas.

### **Responsiveness to Credit and Community Development Needs**

The institution exhibited good responsiveness to credit and community economic development needs. As reflected in the above tables, a majority of the qualified investments and donations funded affordable housing and revitalization and stabilization activities. NDBT did not ignore any of the

remaining categories, and the identified community development needs encompass all four categories.

### **Community Development Initiatives**

NDBT occasionally uses innovative and/or complex investments to support community development initiatives. This included three investments totaling \$750 thousand in community development financial institutions. NDBT also maintains two separate prior period investments in small business investment companies (SBIC). One SBIC investment helps to revitalize and stabilize low- and moderate-income geographies throughout the bank's AA, while the other one assisted with affordable housing.

### **SERVICE TEST**

The bank demonstrated a high satisfactory record regarding the Service Test. The reasonable accessibility of retail banking services inhibited the leadership level of community development services to primarily support this conclusion. In further support, the bank's reasonableness of hours and services did not vary in a way that inconvenienced certain portions of the assessment area and the bank did not open or close any branches since the prior evaluation.

### **Accessibility of Delivery Systems**

Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area. The reasonable accessibility of alternative delivery systems lifted the limited branch distribution to support this conclusion.

The following table shows that the bank does not operate any branches or ATMs in low- or moderate-income census tracts, which supports accessibility to limited portions of the Dallas MD AA. The table further shows that 40.7 percent of the assessment area's population resides in low- and moderate-income census tracts, which comprise 40.6 percent of the area's census tracts. However, examiners determined that the bank's branch and ATM locations lie in close proximity to the area's moderate-income census tracts. Specifically, two branches lie approximately two census tracts away from moderate-income geographies, while the remaining three branches lie within one census tract of such geographies.



Branch and ATM Distribution by Geography Income Level Institution												
Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	109	12.6	464,767	12.6	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	242	28.0	1,033,321	28.1	0	0.0	0	0.0	0	0.0	0	0.0
Middle	222	25.7	956,241	26.0	2	40.0	2	16.7	0	0.0	0	0.0
Upper	276	31.9	1,184,623	32.2	3	60.0	4	83.3	0	0.0	0	0.0
NA	16	1.8	39,052	1.1	0	0.0	0	0.0	0	0.0	0	0.0
<b>Totals</b>	<b>865</b>	<b>100.0</b>	<b>3,678,004</b>	<b>100.0</b>	<b>5</b>	<b>100.0</b>	<b>6</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>	<b>0</b>	<b>100.0</b>
Source: 2020 U.S. Census & Bank Data Due to rounding, totals may not equal 100.0%												

Additionally, the bank operates ATMs with deposit-taking capabilities at the Las Colinas, Addison, and Frisco Branches. This service allows consumers to make deposits outside of normal business hours. The bank also belongs to the STAR and All Point ATM networks, which provide surcharge-free access to thousands of ATMs located in storefronts including Walgreens, RaceTrac, and Target. Many of these ATMs are located throughout the bank's AA, creating enhanced access for low- and moderate-income customers and in low- and moderate-income geographies.

The bank also offers a variety of alternative systems that prove reasonably accessible in delivering retail banking services. For example, the institution provides free internet banking that allows customers the ability to review their account balances and account activities, view and print copies of checks, transfer funds internally between accounts, transfer funds to accounts at external financial institutions, schedule recurring transfers, set up account balance and transaction email or text alerts, place online stop payments, and access online bill pay. Customers may also download information into financial software, send and receive secure messages with the bank, access debit card alerts, card controls, and spendable balance tools.

The bank's mobile banking provides many of these same services from any mobile device including viewing account balances and activity, transferring funds internally between accounts, accessing online bill pay, and making deposits with checks. Customers may also make mobile wallet payments. Further, the bank offers text banking for customers to view account balances and recent transactions. In addition, the bank offers telephone banking that allows customers the ability to make balance inquiries, request transaction history, transfer funds, and reorder checks. Finally, customers may bank by mail by making deposit or loan payments, safe deposit box payments, and reordering checks. These delivery systems also address various needs of commercial customers, including small businesses, such as payroll cards, remote deposit capture, and treasury management services.

Despite, the lack of branch and ATM distribution in low- and moderate-income geographies, other effective forms of alternative delivery systems and the close proximity of branches and ATMs to the low- and moderate-income geographies provide reasonable accessibility for low- and moderate-income individuals.

### **Changes in Branch Locations**

The opening and closing of branches has not adversely affected the accessibility of the bank's delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. As noted previously, the bank did not experience any branch openings or closings nor did they participate in any merger or acquisition activities since the last evaluation.

### **Reasonableness of Business Hours and Services**

Services, including business hours, do not vary in a way that inconveniences certain portions of the assessment area, particularly low- and moderate-income geographies and/or individuals.

Accessibility to a variety of services, including low-cost checking accounts and ATM accessibility, primarily supports this conclusion.

As previously stated, the bank provided reasonable accessibility through its alternative delivery systems to all segments of its assessment area. In addition, the bank currently operates lobby hours of 8:30 AM to 4:00 PM Monday through Thursday and 8:30 AM to 5:00 PM on Friday. Further, all drive-thru locations operate Monday through Friday from 8:00 AM to 5:00 PM and Saturday from 8:30 AM to 12:00 PM.

The range of services covers a wide variety of products and services including consumer checking, savings, certificates of deposit, and individual retirement accounts as well as several loan options. To enhance options for low- and moderate-income individuals, the bank offers the 180 checking account, a certified BankOn product that offers a fresh start to build a banking relationship. The account offers no overdraft or returned item fees and has a service charge that can be waived with a direct deposit or eStatement. For businesses, products and services include checking and savings accounts as well as retirement plan services and treasury services.

### **Community Development Services**

The institution is a leader in providing community development services. The following table shows that the bank provided 101 community development services since the previous evaluation. This number equates to an average of 6.5 community development services, per office, per year since the previous evaluation, thereby reflecting a leadership level for the evaluation period. The bank averaged five full-service offices for the 3.1 years since the previous evaluation. These levels reflect a decreased trend from the 132 community development services, equating to 9.8 services, per office, per year, noted at the previous evaluation.

The following tables show the number of community development services by assessment area,

purpose, and year.

Community Development Services by Assessment Area Institution					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Dallas MD AA	1	95	1	0	97
Statewide Activities	0	4	0	0	4
<b>Total</b>	<b>1</b>	<b>99</b>	<b>1</b>	<b>0</b>	<b>101</b>
<i>Source: Bank Data</i>					

Community Development Services by Year Institution					
Activity Year	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
2020*	0	8	1	0	9
2021	0	16	0	0	16
2022	1	43	0	0	43
2023**	0	32	0	0	32
<b>Total</b>	<b>1</b>	<b>99</b>	<b>1</b>	<b>0</b>	<b>101</b>
<i>Source: Bank Data. *07/13/2020 /30/2020-12/31/2020; **1/1/2023-9/24/2023</i>					

The following provides examples of the community development services specific to the Dallas MD AA.

- ***Economic Development:*** An employee serves as Vice Chairman of the Board and as a member of a committee for an Economic Development Corporation (EDC). The EDC aims to increase business recruitment and retain existing businesses in North Dallas. As Vice Chairman of the Board, the employee uses their financial expertise to provide information on various incentives and proposals for prospective and existing businesses. As a member of the Budget and Audit Committee, the employee assists in preparing the annual budget and monthly and quarterly review of income and expenses for the EDC.
- ***Community Services:*** Several employees volunteer at Junior Achievement Finance Park events to teach financial literacy lessons to middle and high school students at various schools in the assessment area. The schools had a majority of students that receive free or reduced lunch, which is a proxy for low- and moderate-income families. Employees teach students about business and financial related topics.

## **DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW**

The bank's compliance with the laws relating to discrimination and other illegal credit practices was reviewed, including the Fair Housing Act and the Equal Credit Opportunity Act. Examiners did not identify any discriminatory or other illegal credit practices.

## **APPENDICES**

### **LARGE BANK PERFORMANCE CRITERIA**

#### **Lending Test**

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

- 1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
- 2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
  - i. The proportion of the bank's lending in the bank's assessment area(s);
  - ii. The dispersion of lending in the bank's assessment areas(s); and
  - iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
- 3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
  - i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
  - ii. Small business and small farm loans to businesses and farms with gross annual revenues of \$1 million or less;
  - iii. Small business and small farm loans by loan amount at origination; and
  - iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
- 4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
- 5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

#### **Investment Test**

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

- 1) The dollar amount of qualified investments;
- 2) The innovativeness or complexity of qualified investments;
- 3) The responsiveness of qualified investments to available opportunities; and
- 4) The degree to which qualified investments are not routinely provided by private investors.

## **Service Test**

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

- 1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
- 2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
- 3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.*, RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
- 4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

- 1) The extent to which the bank provides community development services; and
- 2) The innovativeness and responsiveness of community development services.

## 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.

**American Community Survey (ACS):** A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

**Area Median Income:** The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

**Assessment Area:** A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

**Census Tract:** A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

**Combined Statistical Area (CSA):** A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

**Community Development:** For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

**Community Development Corporation (CDC):** A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

**Community Development Financial Institutions (CDFIs):** CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

**Community Development Loan:** A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
  - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

**Community Development Service:** A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

**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.

**Core Based Statistical Area (CBSA):** The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.



**Distressed Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

**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. Other family 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).

**FFIEC-Estimated Income Data:** The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

**Full-Scope Review:** A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 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 the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

**Home Mortgage Loans:** Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

**Housing Unit:** Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

**Limited-Scope Review:** A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

**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.

**Low Income Housing Tax Credit:** The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

**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.

**Median Income:** The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

**Metropolitan Division (MD):** A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area (MSA):** CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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.

**Micropolitan Statistical Area:** CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

**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 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 and less than 80 percent in the case of a geography.

**Multi-family:** Refers to a residential structure that contains five or more units.

**Nonmetropolitan Area** (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

**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 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.

**Rural Area:** Territories, populations, and housing units that are not classified as urban.

**Small Business Investment Company (SBIC):** SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

**Small Farm Loan:** 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

**Underserved Middle-Income Nonmetropolitan Geographies:** A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

**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.

**Urban Area:** All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, “urban” consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

“Urban” excludes the rural portions of “extended cities”; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

## Banking Center Locations

North Dallas Bank & Trust Co.  
Dallas Banking Center  
12900 Preston Road  
Dallas, TX 75230

MSA/MD Code 19124  
State Code 48  
County Code 113  
Census Tract 0132.01

North Dallas Bank & Trust Co.  
Plano Banking Center  
3900 Preston Road  
Plano, TX 75093

MSA/MD Code 19124  
State Code 48  
County Code 085  
Census Tract 0316.76

North Dallas Bank & Trust Co.  
Las Colinas Banking Center  
7660 N. MacArthur Blvd.  
Irving, TX 75063

MSA/MD Code 19124  
State Code 48  
County Code 113  
Census Tract 0141.24

North Dallas Bank & Trust Co.  
Frisco Banking Center  
7359 Preston Road  
Frisco, TX 75034

MSA/MD Code 19124  
State code 48  
County Code 085  
Tract Code 0304.09

North Dallas Bank & Trust Co.  
Addison Banking Center  
5150 Keller Springs Road  
Dallas, TX 75248

MSA/MD Code 19124  
State Code 48  
County Code 113  
Census Tract 0136.20

### **Banking Centers Opened**

No banking centers were opened during the current year or either of the two prior calendar years.

### **Banking Centers Closed**

No banking centers were closed during the current year or either of the two prior calendar years.

**Products and Services**

## **PRODUCTS AND SERVICES**

North Dallas Bank & Trust Co. (NDBT) provides a variety of financial services to meet the needs associated with a full service bank, as detailed in the adjoining material. All of these products and services are generally accessible at each bank location, with the exception of Treasury Services and Trust & Wealth Management, which are typically offered at the Dallas Banking Center on Preston Road.

## **BANKING HOURS**

<b><u>Lobby</u></b>	Monday – Thursday	8:30 am to 4:00 pm
	Friday	8:30 am to 5:00 pm
<b><u>Drive Thru</u></b>	Monday – Friday	8:00 am to 5:00 pm
	Saturday	8:30 am to 12:00 pm
<b><u>ATMs</u></b>	Located at each banking center and available at any time	

## **ALTERNATIVE METHODS OF BANKING**

In addition to traditional lobby and drive thru locations, the bank offers the following methods to access banking services.

- NDBT ATMs
  - Cash withdrawals
  - Balance inquiries
  - Funds transfers
  - Deposits
- Allpoint ATMs – Available with no surcharge
- MasterCard Debit Cards
- Mobile Wallet Payments
- Bank by Mail
  - Deposits and loan payments
  - Safe deposit box payments
  - Check reorders
- Telephone Banking
  - Balance inquiries
  - Transaction history
  - Funds transfers
  - Reorder checks
- Text Banking
  - View account balances
  - View recent account activity
- Mobile Banking App and Mobile Website
  - View account balances and activity
  - Transfer funds between NDBT accounts
- Access online bill pay
- Make check deposits
- Online Banking
  - View account balances and activity
  - View and print copies of checks and electronic statements
  - Transfer funds between NDBT accounts and other institutions
  - Schedule recurring transfers
  - Access online bill pay and person-to-person payments
  - Download information into financial software such as Quicken® or QuickBooks™
  - Send and receive secure messages with the bank
  - Place stop payments
  - Set up account balance and transaction emails or text alerts
  - Debit Card Alerts and Card Controls
  - Spendable Balance Tools
  - Update addresses



**Consumer (Personal)**  
**Products & Services**

## Personal Bank Accounts

Refer to the rate schedule for current interest rates and annual percentage yields (APYs). See page 2 for additional information and account terms.

	Personal Checking	Interest Checking	Celebration Club	Premier Checking	180 Banking
Eligibility Requirements	None	None	Customers age 60 or over	None	None
Minimum Balance to Open	\$100	\$100	\$100	\$100	\$20
Service Charge per Statement Cycle	\$5	\$10	\$12	\$20	\$5
Required Criteria to Waive Service Charge	Minimum \$750 Daily Balance or Direct Deposit or eStatement during statement cycle	Minimum \$2,000 Daily Balance	Minimum \$3,000 Average Daily Balance	Minimum \$25,000 combined average daily balance in checking, savings, money market, CD and/or IRA accounts	Direct Deposit or eStatement during statement cycle
Interest Computation and Crediting	N/A	Accrues Daily; Credited to the account monthly	Accrues Daily; Credited to the account monthly	Accrues Daily; Credited to the account monthly	N/A
Minimum Daily Balance to Earn Disclosed APY	N/A	\$500	None	\$500	N/A
Transaction Limitations and Additional Features	N/A	N/A	Complimentary Celebration Club checks, cashier's checks, money orders, domestic wire transfers  Annual discount on safe deposit box rental fees  *Contents of safe deposit box are not FDIC insured	Complimentary checks, cashier's checks, money orders, domestic wire transfers  Refund Domestic ATM fees  Each related account used for combined balances must be held with NDBT and is subject to minimum balance requirement per account type	No overdraft or returned item fees  No checks may be written against this account type

## Personal Bank Accounts

### THE FOLLOWING TERMS APPLY TO OUR PERSONAL BANK ACCOUNTS:

**FEES AND CHARGES.** Refer to the Personal Fee Schedule for information about other fees and charges associated with these accounts.

**OTHER FEATURES AND SERVICES.** No ATM surcharge for transactions at NDBT (North Dallas Bank & Trust Co.) or participating Allpoint Network ATMs. Services available with these accounts include: online, telephone, and mobile banking, eStatements, online bill pay, peer-to-peer (P2P) payments, mobile deposit, debit card, and debit card alerts.

**SUB ACCOUNTS.** These accounts consist of a checking sub account and a savings sub account created for the Bank's accounting purposes. The Bank may periodically transfer funds between these two sub accounts; however, on the sixth transfer each month, funds will be transferred back to the checking sub account. The savings sub account will be governed by the rules governing our other savings accounts. This process will not affect your interest calculation (if applicable), available balance, FDIC insurance protection, or your monthly statement.

**CELEBRATION CLUB AND PREMIER CHECKING MINIMUM BALANCE REQUIREMENTS.** The average daily balance is calculated by adding the principal in the account for each day of the period and dividing that figure by the number of days in the period.

### FOR OUR PERSONAL BANK ACCOUNTS WHICH EARN INTEREST, THE FOLLOWING TERMS ALSO APPLY:

**DETERMINATION OF RATE.** The interest rate and annual percentage yield may change at our discretion and at any time. There are no maximum or minimum interest rate limits for these accounts.

**INTEREST COMPOUNDING AND CREDITING.** Interest will not compound. If the account is closed before interest is credited, the account holder will not receive the accrued interest.

**INTEREST COMPUTATION.** We use the daily balance method to calculate interest on these accounts. This method applies a daily periodic rate to the principal in the account each day. Interest begins to accrue no later than the business day we receive credit for the deposit of noncash items (for example, checks).



## Personal Savings Accounts

Refer to the rate schedule for current interest rates and annual percentage yields (APYs). See Page 2 for additional information and account terms.

	Personal Savings	Select Savings	Personal Money Market	Health Savings
Eligibility Requirements	None	None	None	None
Minimum Balance to Open	\$100	\$100	\$100	\$100
Service Charge per Statement Cycle	\$5	\$15	\$15	\$2.25
Minimum Balance to Waive Service Charge	\$100 Daily Balance	\$2,500 Daily Balance	\$2,500 Average Daily Balance	\$500 Daily Balance
Interest Computation and Crediting	Compounds daily; Credited to the account quarterly	Compounds daily; Credited to the account monthly	Accrues daily; Credited to the account monthly; Does not compound	Accrues daily; Credited to the account monthly; Does not compound
Interest Rate Tiers Based on Daily Balance (Interest in each tier paid on the entire balance in the account)	Rate Not Tiered	\$1,000,000 and greater \$250,000 - \$999,999 \$100,000 - \$249,999 \$50,000 - \$99,999 \$2,500 - \$49,999	\$1,000,000 and greater \$250,000 - \$999,999 \$50,000 - \$249,999 \$25,000 - \$49,999 \$10,000 - \$24,999 \$2,500 - \$9,999	\$10,000 and greater \$2,500 - \$9,999 \$500 - \$2,499 \$1 - \$499
Minimum Daily Balance to Earn Disclosed APY	None	\$2,500	\$2,500	\$1
When Interest Begins to Accrue	Business day noncash items are deposited	Business day noncash items are deposited	Business day we receive credit for the deposit of noncash items	Business day we receive credit for the deposit of noncash items
Transaction Limitations	None	None	None	Subject to limitations/penalties imposed by IRS; Refer to HSA Agreement or tax advisor for more information
Excessive Withdrawal Fee	\$2 for each withdrawal after the first 3 per month	\$2 for each withdrawal after the first 3 per month	\$2 for each withdrawal after the first 3 per month	None
Additional Features and Information	None	None	None	One-time setup fee of \$25; If excess contributions are made, \$20 fee imposed for distribution of any excess funds

## Personal Savings Accounts

### **THE FOLLOWING TERMS APPLY TO OUR PERSONAL SAVINGS ACCOUNTS**

**FEES AND CHARGES.** Refer to the Personal Fee Schedule for information about other fees and charges associated with these accounts.

**OTHER FEATURES AND SERVICES.** No ATM surcharge for transactions at North Dallas Bank & Trust Co. or participating MoneyPass or Allpoint Network ATMs. Services available with these accounts include: online, telephone, and mobile banking, eStatements, mobile deposit, debit card, and debit card alerts.

**DETERMINATION OF RATE.** The interest rate and annual percentage yield may change at our discretion and at any time. There are no maximum or minimum interest rate limits for these accounts.

**INTEREST CREDITING.** If the account is closed before interest is credited, the account holder will not receive the accrued interest.

**INTEREST COMPUTATION.** We use the daily balance method to calculate interest on these accounts. This method applies a daily periodic rate to the principal in the account each day.

**PERSONAL MONEY MARKET MINIMUM BALANCE REQUIREMENTS.** The average daily balance is calculated by adding the principal in the accounts for each day of the period and dividing that figure by the number of days in the period.

**HEALTH SAVINGS SUB ACCOUNTS.** These accounts consist of a checking sub account and a savings sub account created for the Bank's accounting purposes. The Bank may periodically transfer funds between these two sub accounts; however, on the sixth transfer each month, funds will be transferred back to the checking sub account. The savings sub account will be governed by the rules governing our other savings accounts. This process will not affect your interest calculation (if applicable), available balance, FDIC insurance protection, or your monthly statement.

## **CDs AND IRAs**

There's no time like the present to start planning for the future. Whether you are looking for a structured savings tool with a competitive rate, setting aside money for your child's education or saving for your own retirement, NDBT offers a wide variety of Certificate of Deposit (CD) and Individual Retirement Account (IRA) products to help you achieve your goal.

A Certificate of Deposit (CD) is an excellent savings option that rewards your patience with a higher interest rate and steady growth. Choose your term and amount and watch your savings grow – all while enjoying the peace of mind that comes with FDIC insurance.<sup>1</sup>

- Please contact us for current rates.
- FlexRate CDs allow you to take advantage of potential rate increases.
- CD terms range from 6 to 60 months.
- Your interest earnings can be added to your CD or be paid directly to you.

An Individual Retirement Account (IRA) is another effective savings tool that allows you to make contributions to your own tax-sheltered retirement account.

- Traditional and Roth IRAs offer unique benefits and tax advantages.<sup>2</sup>
- IRAs terms from 6 to 60 months.
- Our 60-month FlexRate IRA enables you to make the most of possible rate increases.

<sup>1</sup> FDIC insurance is subject to current FDIC guidelines.

<sup>2</sup> Please consult your tax advisor to determine which IRA product is right for you.

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## **CONSUMER LENDING**

NDBT offers a broad range consumer loan products. Although mortgage loans are typically processed by our Mortgage Division at the Dallas Banking Center on Preston Road, applications can be submitted online or in any banking center.

### **New/Pre-Owned Personal Vehicles**

Search for that new or pre-owned vehicle with confidence knowing you can negotiate your best deal with financing already in place. Apply now to take advantage of NDBT's vehicle loans and prequalification program.

### **Personal Loans**

Unsecured loans with fixed Interest rates and no prepayment penalties make a personal loan from NDBT a great option for one-time purchases, debt consolidation and other occasional borrowing needs.

### **Overdraft Protection Lines of Credit**

Avoid unexpected overdrafts in your North Dallas Bank & Trust Co. checking account by utilizing an Overdraft Protection line of credit. Each time you borrow and repay the balance, the line automatically remains available for future use. Refer to the bank's fee schedule for current fees.

### **Home Equity Loans**

A home equity loan allows you to borrow against the equity in your home. A home equity loan can be used for debt consolidation, to buy a second home or pay for unforeseen expenses.

### **Home Equity Lines of Credit**

A home equity line of credit (HELOC) allows you to borrow against the equity in your home. A HELOC is a revolving line of credit ideal for flexible spending and repayment. This product offers you access to money when you need it for home repairs, medical expenses or even the debt consolidation.

### Home Improvement Loans

If you are considering making improvements to your home, like adding a room, remodeling the kitchen or installing a swimming pool, a home improvement loan may be right for you.

### Construction and Residential Lot Loans

When it comes to financing a new or existing home and the land on which it occupies, we have the solution. NDBT provides financing, experience, and guidance to help you through every step of the process. We offer the following types of financing:

- Interim construction
- Construction to permanent loan
- Lot loans

### Traditional Mortgages

The Mortgage Division of NDBT offers both fixed-rate and adjustable-rate (ARM) mortgages. If you are looking for construction financing, new purchase, lowering your monthly payment or turning your home's equity into cash, we have the products and expertise to help you.

### Affordable Home Loans

Here at NDBT we strive to provide mortgage products that lower the barriers to homeownership for low and moderate income wage earners. Our affordable Home Loans are designed to provide members of the communities we serve, a pathway to finance the home of their dreams. Whether it's purchasing your first home or accessing your home's equity, our mortgage lenders will provide the support and guidance to help you achieve your goal.

A Community Home Equity Loan is designed for low and moderate income wage earners enabling them to borrow against the equity in their home. This product is an excellent source of financing for home repairs, remodeling and other personal expenses. Features include no private mortgage insurance or prepayment penalties.

HomeStart is a special mortgage program designed to lower barriers to homeownership for low and moderate income wage earners. Loans for up to 97% of the value of your home with no private mortgage insurance or prepayment penalties.

### Consumer Credit Cards

Choosing the right credit card is easier than ever. Whether you want to pay down balances faster, maximize cash back, earn rewards or begin building your credit history, we have the ideal card for you!



## Personal Fee Schedule

For additional information, call 972.716.7100.

Description	Fee	Additional Information
<b>Debit Card Fees</b>		
International Fee		
Cross-Border Fee	0.9%	of transaction amount
Currency Conversion Fee	0.2%	of transaction amount (if applicable)
Card Replacement	\$8	Per card
<b>Overdraft Services and Fees</b>		
Overdraft Sweep Fee	\$2	Per transfer
Returned Item Fee – Applies to checks, drafts, or ACH debits	\$25	For each item (maximum of 4 fees per day) (Not applicable to 180 Banking)
Overdraft Item Fee – Applies to checks, drafts, or ACH debits	\$25	For each item (maximum of 4 fees per day) (Not applicable to 180 Banking)
<b>Wire Transfer Services</b>		
Incoming Wire – International	\$10	Per wire
Outgoing Wire – Domestic	\$20	Per wire
Outgoing Wire – International	\$40	Per wire (plus additional fees if not sent in US Dollars)
<b>Foreign and International Services</b>		
Foreign Currency Fee	\$15	Per order (other fees may apply based on amount purchased and overnight or rush services)
Foreign Currency Small Order Fee (less than \$300 USD)	\$10	Per order (Foreign Currency Fee may apply and additional fees for overnight or rush services)
Foreign Draft	\$15	Per draft
International Collection Item	\$15	Minimum per check or draft (fee varies based on the USD value and fees from paying bank)
<b>Other Fees</b>		
Account Closed within 90 days of opening	\$15	Per account (Not applicable to 180 Banking)
Cashier's Check (Customer)	\$5	Per check
Cashier's Check (Non-customer)	\$15	Per check (conversion of OnUs check to a Cashier's Check)
Check Cashing Fee (Non-customer)	1%	Of check(s) amount (maximum \$20; Total amount under \$500 is no charge)
Check/Deposited Item Copy	\$1	Each copy
Coin Counting and Sorting	2%	Of total (\$2 minimum fee)
Collection Item	\$15	Per item
Deposited Item/Cashed Check Returned/Re-cleared Item	\$5	Per check or draft
Interim Statement	\$2	Per statement
Money Orders	\$1	Per Money Order
Research	\$25	Per hour (\$15 if less than 1 hour)
Statement Copy	\$5	Per statement plus \$1 per page for check images
Check Stop Payment (In Person)	\$25	Per request
ACH Stop Payment (In Person)	\$27	Per request
Check/ACH Stop Payment (Online)	\$15	Per request
Temporary Checks	\$1	Per sheet (4 per sheet)





## Personal Fee Schedule

For additional information, call 972.716.7100.

Description	Fee	Additional Information
<b>Safe Deposit Box Fees</b>		
3" x 5" Box	\$35	Annually
5" x 5" Box	\$35	Annually
3" x 10" Box	\$50	Annually
5" x 10" Box	\$80	Annually
7" x 10" Box	\$95	Annually
10" x 10" Box	\$120	Annually
16" x 18" Box	\$245	Annually
Lost Key Box Drill	\$350	One-time fee
No Show Drill Fee	\$200	One-time fee

Description	Fee	Additional Information
<b>Online Banking Bill Payment Fees</b>		
Up to 30 payments per month	No charge	
Each payment over 30 per month	\$0.50	
Bill Payment ACH Debit NSF Fee	\$25.00	Not applicable to 180 Banking
Bill Pay Proof of Payment / Check Image Research	\$10.00	
Bill Pay Payment Research Claim	\$25.00	
Bill Pay Stop Payment / Reissue Request	\$15.00	
Same Day Payment	\$9.95	
Overnight Check Payment	\$14.95	

Refer to the Terms and Conditions of Your Account for more information.

## **PERSONAL FEE SCHEDULE - LOANS**

The following fees are generally assessed for consumer loan products. These fees are subject to change at any time.

	<b>Loan Fee</b> (percent of loan amount)	<b>Application Fee</b>
<b>Home Equity</b>		
Term Loan 2nd Lien	-	\$650
HELOC 1st Lien	-	\$500
HELOC 2nd Lien	-	\$500

<b>Residential Lot Loans</b>		
1 Year Interest Only	0.50%	\$500
5 Year Balloon	0.50%	\$500

<b>Interim Construction</b>		
1 Year Initial Construction	0.50%	\$750

<b>Residential Mortgages</b>			
5yr/6mo ARM	Fee Interest Rate	1.00%	\$750
	No Fee Interest Rate	-	\$750
	One Time Close	1.00%	\$750
5yr/6mo ARM - Cash Out	Fee Interest Rate	1.00%	\$650
	No Fee Interest Rate	-	\$650
5 Year Balloon	Fee Interest Rate	0.50%	\$750
	No Fee Interest Rate	-	\$750
7yr/6mo ARM	Fee Interest Rate	1.00%	\$750
	No Fee Interest Rate	-	\$750
	One Time Close	1.00%	\$750
7yr/6mo ARM - Cash Out	Fee Interest Rate	1.00%	\$650
	No Fee Interest Rate	-	\$650
10YR/6mo ARM	Fee Interest Rate	1.00%	\$750
	No Fee Interest Rate	-	\$750
	One Time Close	1.00%	\$750
10yr/6mo ARM - Cash Out	Fee Interest Rate	1.00%	\$650
	No Fee Interest Rate	-	\$650
15 Year Fixed Rate	Fee Interest Rate	1.00%	\$750
	No Fee Interest Rate	-	\$750
15 Year Fixed Rate - Cash Out	Fee Interest Rate	1.00%	\$650
	No Fee Interest Rate	-	\$650
Bridge Loan 1 Year Interest Only	Fee Interest Rate	0.50%	\$750
Non-Owner Occupied	Fee Interest Rate	1.00%	\$750

<b>Special Program Residential Mortgages</b>			
HomeStart	Fee Interest Rate	-	-
HomeStart - ITIN Borrower	Fee Interest Rate	-	-
Community Home Equity 1st Lien	Fee Interest Rate	-	-
Community Home Equity 2nd Lien	Fee Interest Rate	-	-

### **Secondary Market Loans**

Different fees apply when obtaining a mortgage to be sold on the secondary market. These fees are determined by the investor purchasing the mortgage.

**Commercial (Business)**  
**Products & Services**

## Business Checking Accounts

Refer to the rate schedule for current interest rates and annual percentage yields (APYs).

	Business Checking	Commercial Checking	Community Checking
Eligibility Requirements	None	None	NOW Account for Non-Profit Organizations and Sole Proprietors
Minimum Balance to Open	\$100	\$100	\$100
Service Charge per Statement Cycle	\$10	Based on Account Analysis	None
Minimum Balance to Waive Service Charge	\$5,000 combined daily balances in business checking and/or savings accounts or \$100,000 minimum outstanding balances in a business loan or line of credit	N/A	N/A
Interest Computation and Crediting	N/A	N/A	Accrues daily; Credited to the account monthly; Does not compound
Minimum Daily Balance to Earn Interest	N/A	N/A	\$2,000
Transaction Limitations	<ul style="list-style-type: none"> <li>150 deposited items per statement cycle at no charge; \$0.50 fee for each additional deposited item</li> <li>100 withdrawals per statement cycle at no charge; \$0.50 fee for each additional withdrawal</li> </ul>	Fees Based on Account Analysis	<ul style="list-style-type: none"> <li>100 deposited items per statement cycle at no charge; \$0.13 fee for each additional deposited item</li> <li>200 withdrawals per statement cycle at no charge; \$0.15 fee for each additional withdrawal</li> </ul>
Additional Information	Each related account used for combined balances must be held with North Dallas Bank & Trust Co. and in the name of the same account owner and is subject to minimum balance requirement per account type.	For specific fee information, refer to our business fee schedule or the Treasury Management agreement(s) applicable for your account relationship.	N/A

**FEES AND CHARGES.** Refer to the Business Fee Schedule for information about other fees and charges associated with these accounts.

**OTHER FEATURES AND SERVICES.** No ATM surcharge for transactions at North Dallas Bank & Trust Co. or participating MoneyPass or Allpoint Network ATMs. Services available with these accounts include: online, telephone, and mobile banking, eStatements, online bill pay, debit card, and debit card alerts.



## Business Savings Accounts

Refer to the rate schedule for current interest rates and annual percentage yields (APYs).

	Business Savings	Business Money Market
Minimum Balance to Open	\$100	\$100
Service Charge per Statement Cycle	\$15	\$15
Minimum Balance to Waive Service Charge	\$250 Daily Balance	\$2,500 Average Daily Balance
Interest Computation and Crediting	Compounds daily; Credited to the account monthly	Accrues daily; Credited to the account monthly; Does not compound
Interest Rate Tiers Based on Daily Balance (Interest in each tier paid on the entire balance in the account)	\$1,000,000 and greater \$250,000 - \$999,999 \$100,000 - \$249,999 \$50,000 - \$99,999 \$2,500 - \$49,999	\$1,000,000 and greater \$250,000 - \$999,999 \$50,000 - \$249,999 \$25,000 - \$49,999 \$10,000 - \$24,999 \$2,500 - \$9,999
Minimum Daily Balance to Earn Interest	\$2,500	\$2,500
When Interest Begins to Accrue	Business day noncash items are deposited	Business day we receive credit for the deposit of noncash items
Transaction Limitations	150 deposited items per statement cycle at no charge; \$0.50 fee for each additional deposited item	None
Excessive Withdrawal Fee	\$2 fee for each withdrawal after the first 6 per month	\$2 fee for each withdrawal after the first 6 per statement cycle

**FEES AND CHARGES.** Refer to the Business Fee Schedule for information about other fees and charges associated with these accounts.

**OTHER FEATURES AND SERVICES.** No ATM surcharge for transactions at North Dallas Bank & Trust Co. or participating MoneyPass or Allpoint Network ATMs. Services available with these accounts include: online, telephone, and mobile banking, eStatements, debit card, and debit card alerts.

## **CERTIFICATES OF DEPOSIT**

There's no time like the present to start planning for the future. Whether you are looking for a structured savings tool with a competitive rate or setting aside money for your business, we offer a wide variety of Certificate of Deposits to help you achieve your savings goals.

A Certificate of Deposit (CD) is an excellent savings option that rewards your patience with a higher interest rate and steady growth. Choose your term and amount and watch your savings grow – all while enjoying the peace of mind that comes with FDIC insurance.<sup>1</sup>

- Standard and jumbo CDs are available. Please contact us for current rates.
- FlexRate CDs allow you to take advantage of potential rate increases.
- Terms range from 6 to 60 months.
- Your interest earnings can be added to your CD or be paid directly to you.

<sup>1</sup> FDIC insurance is subject to current FDIC guidelines.

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## **TREASURY MANAGEMENT**

NDBT offers a suite of sophisticated treasury services that can help your company maximize funds from collection through disbursement. We take the time to understand your company's needs before developing a customized solution that best meets your cash management goals.

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## **COMMERCIAL LENDING**

Whether you need a working capital line of credit to help with seasonal growth, term financing for capital expenses or to fund long-term business growth, NDBT offers the financing solutions and expertise to help your business succeed. Also, when you are ready to buy that new building or refinance your existing property, NDBT offers a variety of financing solutions.

### **Business Lines of Credit**

Our flexible and customized line of credit helps you prepare for the changing needs of your business. The line of credit provides a convenient way to access available funds to finance growth, purchase inventory or cover business expenditures.

### **Equipment Financing**

We offer a variety of financing solutions to help you acquire the equipment you need for your daily operations and long-term goals. Our knowledgeable lenders will work with you to structure a competitively priced and convenient lending solution.

### **Commercial Real Estate**

As a real estate lender who focuses on developing and maintaining strong relationships, we have the ability to meet all your needs with our wide array of commercial real estate financing solutions. We are prepared to help make the typical complex real estate purchasing process as simple as possible. Our flexible financing lets you buy, build, expand and remodel. Construction and permanent financing is available for both owner-occupied and investor projects covering various property types, including warehouse, office, retail and others. Terms can be tailored to meet your financing needs, including fixed interest rates with permanent loans.

### **Interim Construction Loans**

We specialize in interim construction loans for residential and commercial construction projects. Our lenders will work with you to design and implement a construction loan package tailored to your specific needs. Loans are competitively priced and available for pre-sold or speculative residential projects as well as investor and owner-occupied commercial facilities.

### Healthcare Financing and Physician Services

NDBT has proudly served the medical community since 1961 and continues to provide the customized financing and personalized, one-on-one service to help your practice thrive. Our healthcare lending specialties include:

- Practice purchases
- Equipment financing
- Business lines of credit
- Construction loans for new facilities
- Purchase or refinancing of existing buildings
- Specialized medical investments such as hospitals, surgery centers and other designated medical office space

### Business Credit Cards

Choose from our popular business credit card options such as low rate, cash back, or flexible rewards to find the one that works best for your business.



## Business Fee Schedule

For additional information, call 972.716.7100.

Description	Fee	Additional Information
<b>Debit Card Fees</b>		
International Fees		
Cross-Border Fee	0.9%	Of transaction amount
Currency Conversion Fee	0.2%	Of transaction amount (if applicable)
Card Replacement	\$8	Per card
<b>Returned (NSF) and Overdraft Fees</b>		
Returned Item Fee – Applies to checks, drafts, or ACH debits	\$25	For each item (maximum of 4 fees per day)
Overdraft Item Fee – Applies to checks, drafts, or ACH debits	\$25	For each item (maximum of 4 fees per day)
<b>Wire Transfer Services</b>		
Advice of Wire	\$4	Per wire
Incoming Wire – International	\$10	Per wire
Outgoing Wire – Domestic	\$20	Per wire
Outgoing Wire – International	\$40	Per wire (plus additional fees if not sent in US Dollars)
<b>Foreign and International Services</b>		
Foreign Currency Fee	\$15	Per order (other fees may apply based on amount purchased and overnight or rush services)
Foreign Currency Small Order Fee (less than \$300 USD)	\$10	Per order (Foreign Currency Fee may apply and additional fees for overnight or rush services)
Foreign Draft	\$15	Per draft
International Collection Item	\$15	Minimum per check or draft (fee varies based on the USD value and fees from paying bank)
<b>Other Fees</b>		
Account Closed within 90 days of opening	\$15	Per account
Bank Bag Locked	\$25	Per bag
Bank Bag Zipper/Large	\$6	Per bag
Bank Bag Zipper/Small	\$4	Per bag
Cashier's Check (Customer)	\$5	Per check
Cashier's Check (Non-customer)	\$15	Per check (converting an OnUs check to a Cashier's Check)
Check Cashing Fee (Non-customer)	1%	Of check(s) amount (maximum \$20; Total amount under \$500 is no charge)
Check/Deposited Item Copy	\$1	Each copy
Checks Paid	\$0.15	Per item (only applicable for the Business Analysis Checking Account)





## Business Fee Schedule

For additional information, call 972.716.7100.

Description	Fee	Additional Information
Coin Counting and Sorting	2%	Of total (\$2 minimum)
Collection Item	\$15	Per item
Coupon Collection	\$10	Per item
Deposited Item/Cashed Check Returned	\$5	Per check or draft
Full Reconciliation Services	\$80 \$0.08	Per month Per item
Interim Statement	\$2	Per statement
Re-cleared Item	\$5	Per check or draft
Research	\$25	Per hour (\$15 if less than 1 hour)
Returned Coupons	\$25	Per item
Rolled Coin	\$0.15	Per roll deposited or purchased
Statement Copy	\$5	Per statement plus \$1 per page for check images
Check Stop Payment (In Person)	\$25	Per request
ACH Stop Payment (In Person)	\$27	Per request
Check/ACH Stop Payment (Online)	\$15	Per request
Strapped Currency	\$0.30	Per strap deposited or purchased
Temporary Checks	\$1	Per sheet (3 per sheet)
Zero Balance Accounts	\$20	Per month

Description	Fee	Additional Information
<b>Safe Deposit Box Fees</b>		
3" x 5" Box	\$35	Annual charge
5" x 5" Box	\$35	Annual charge
3" x 10" Box	\$50	Annual charge
5" x 10" Box	\$80	Annual charge
7" x 10" Box	\$95	Annual charge
10" x 10" Box	\$120	Annual charge
16" x 18" Box	\$245	Annual charge
Lost Key Box Drill	\$350	Onetime fee
No Show Drill Fee	\$200	Onetime fee
Late Safe Deposit Box Payment Fee	\$5 - \$30	10% of rent: Min \$5 – Max \$30 (45 day grace period)

For more information, refer to your account Terms and Conditions.  
For fees relating to online banking and bill pay, refer to the Small Business Bill Pay Agreement.

## **COMMERCIAL FEE SCHEDULE - LOANS**

The following fees are generally assessed for business loan products.  
These fees are subject to change at any time.

**Fee**  
(percent of loan amount)

### **Commercial Real Estate**

Owner Occupied Property

5 Year Balloon 0.5%

10 Year Fixed 0.5%

15 Year Fixed 0.5%

### **Residential Real Estate**

Investment Property (1-4 Family) 1.0%

**Trust | Wealth Management**  
**Products & Services**

## **INVESTMENTS**

NDBT's investment management process begins by making sure we have a complete understanding of your personal situation, risk tolerance and dreams for the future. Our Trust & Wealth Management team will build a personalized investment plan for you based on your specific circumstances and then make adjustments to this plan as your situation dictates.

Our services include:

- Analysis of portfolio performance
- Allocation of assets
- Risk evaluation
- Tax Impact Assessment
- Clearly defined investment policy statement (IPS)

In managing your investments, your dedicated wealth management professional will explain the wide array of options available, and together, we will determine what strategy is best for you and your portfolio. At NDBT, we treat your money as if it were our own. As such, we ensure that the customized portfolios we manage on behalf of our clients are not just based on the potential returns but take into account each client's goals and risk tolerance. This means that we don't recommend risky or aggressive investments – just smart investments that generate competitive returns for you.

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## **TRUSTS**

No matter what stage of life you are in – just starting out, working and raising a family or enjoying your retirement, our Trust & Wealth Management team can tailor a plan just for you. From creating wealth to caring for future generations, we will work to understand your needs and meet your goals.

### **Revocable & Testamentary Trusts**

Whether you're concerned about who will manage your financial affairs if you become incapacitated, protecting your assets from creditors, minimizing taxes or taking care of your family's financial needs after you are gone, a properly drafted trust could be your answer. Let our professionals put their knowledge and experience to work for you.

### **Estate Settlement**

The prospect of sorting through the many tasks that accompany the passing of a loved one can be very daunting. We can help your loved ones navigate this very difficult time. Appointing NDBT as executor of your estate not only relieves your loved ones of the obligation of dealing with those many financial details, but also provides comfort and assurance that your final instructions are being followed in a respectful, competent and caring way.

### **Management Agencies**

We have assisted many individual trustees and executors in handling the numerous management, administrative and recordkeeping tasks required in their roles. If you are currently serving in a fiduciary capacity and feel overwhelmed by the job at hand, we can help.

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## **RETIREMENT**

No matter where you are in the retirement planning process, our Trust & Wealth Management team can assist you every step of the way. From helping you clarify your financial goals to monitoring your progress and providing objective guidance as your situation and priorities change, we're here to help.

We understand the importance of balancing a client's spending needs while also sustaining financial resources over the long term. Whether you need assistance with your personal Individual Retirement

Account or you are a business owner looking for professional services related to an Employee Benefit Plan, we will make sure you get what you need.

If you're planning ahead on retirement, we can help to develop a savings plan, recommend thoughtful investments and guide you in the use of 401(k) programs and IRAs. Considering your needs, we will develop a personalized plan just for you. Once you decide to retire, your wealth management professional can help you manage your finances, track your spending and expand your retirement portfolio.

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### **FINANCIAL PLANNING**

Our dedicated team of wealth management professionals is committed to developing an actionable plan that will lead you to a more secure financial future.

In order to do so, your wealth management professional will:

- Perform an in-depth analysis of your current financial situation.
- Help you determine and develop your financial goals.
- Establish and evaluate alternative courses of action.
- Create a financial action plan in consideration of what you have discussed.
- Reevaluate your plan periodically.

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*Trust | Wealth Management investments and products:*

*Are NOT Deposits, Are NOT Bank Guaranteed, Are NOT FDIC Insured, Are NOT insured by any Federal Government Agency, May LOSE Value*

## **Assessment Area Map and Geographies**

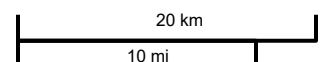
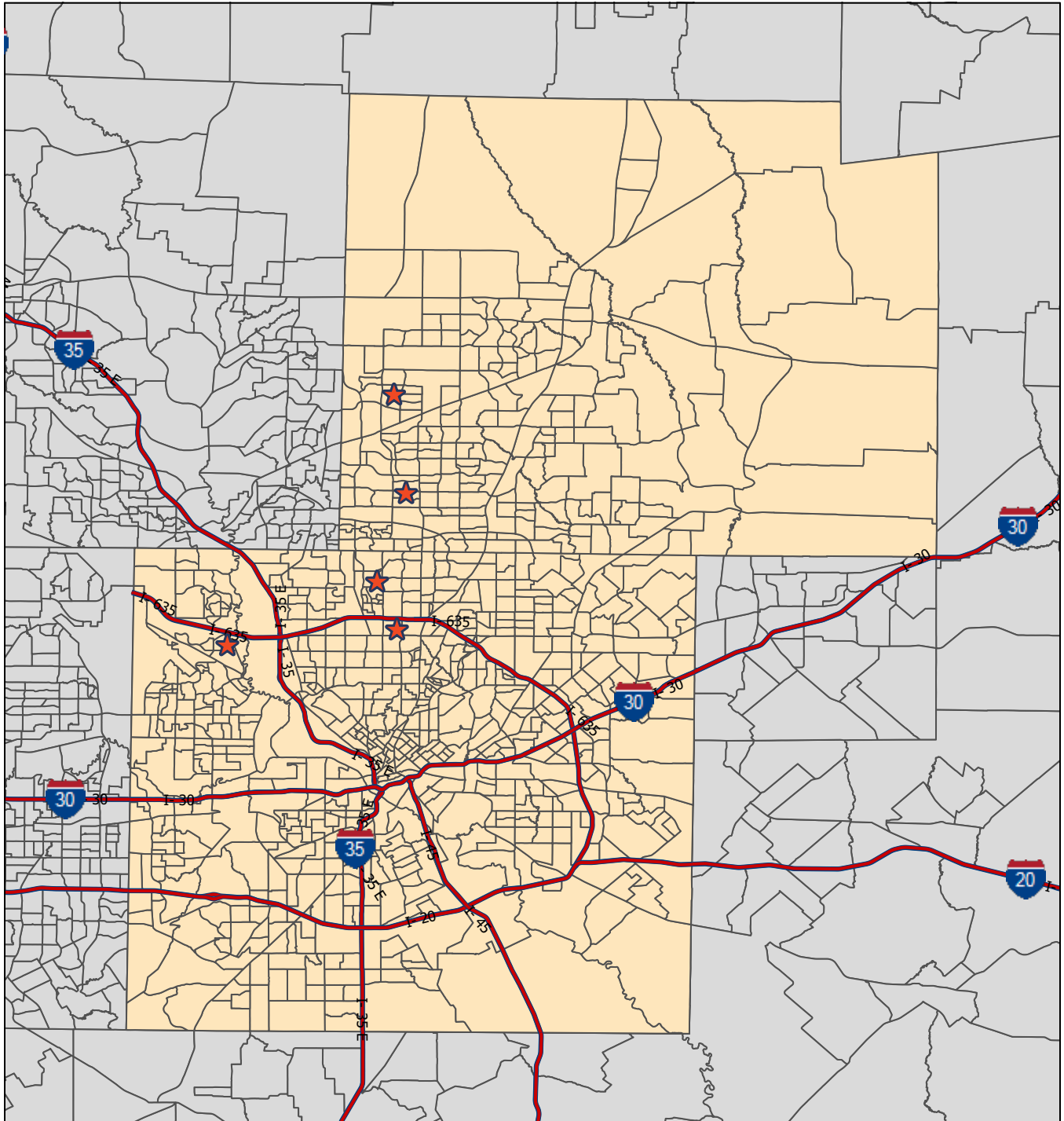
North Dallas Bank & Trust Co.'s CRA Assessment Area includes all census tracts within the following Texas counties:

- Dallas (county code 113)
- Collin (county code 085)



TEXAS ★ BANKING ★ ORIGINAL

## Assessment Area



## **CRA Disclosure Statements**

The two most recently released disclosure statements are included in this Public File.



## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: MONTANA (30)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
MISSOULA COUNTY (063), MT										
MSA 33540										
Outside Assessment Area										
Low Income	1	68	1	141	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	68	1	141	0	0	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	1	68	1	141	0	0	0	0	0	0
STATE TOTAL	1	68	1	141	0	0	0	0	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: NEVADA (32)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
CLARK COUNTY (003), NV										
MSA 29820										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income ≥ 120%	1	21	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	21	0	0	0	0	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	1	21	0	0	0	0	0	0	0	0
STATE TOTAL	1	21	0	0	0	0	0	0	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: NORTH CAROLINA (37)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
WAKE COUNTY (183), NC										
MSA 39580										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income ≥ 120%	0	0	0	0	1	600	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	600	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	1	600	0	0	0	0
STATE TOTAL	0	0	0	0	1	600	0	0	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: OKLAHOMA (40)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
LINCOLN COUNTY (081), OK										
MSA 36420										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	16	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	16	0	0	0	0	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	1	16	0	0	0	0	0	0	0	0
STATE TOTAL	1	16	0	0	0	0	0	0	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TENNESSEE (47)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
KNOX COUNTY (093), TN										
MSA 28940										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	26	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	26	0	0	0	0	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	1	26	0	0	0	0	0	0	0	0
STATE TOTAL	1	26	0	0	0	0	0	0	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
COLLIN COUNTY (085), TX										
MSA 19124										
Inside AA 0001										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	1	170	0	0	0	0	0	0
Median Family Income 40-50%	13	518	1	200	4	2,295	2	63	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	2	81	2	298	0	0	1	176	0	0
Median Family Income 70-80%	1	41	0	0	1	257	1	257	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	5	227	2	336	0	0	1	60	0	0
Median Family Income 100-110%	3	102	1	224	1	1,000	0	0	0	0
Median Family Income 110-120%	5	137	4	690	0	0	4	514	0	0
Median Family Income ≥ 120%	85	3,127	7	1,263	27	9,557	38	5,711	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	114	4,233	18	3,181	33	13,109	47	6,781	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
DALLAS COUNTY (113), TX										
MSA 19124										
Inside AA 0001										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	3	95	0	0	2	652	1	318	0	0
Median Family Income 40-50%	5	169	1	127	1	257	1	28	0	0
Median Family Income 50-60%	3	40	9	1,331	1	810	0	0	0	0
Median Family Income 60-70%	12	487	2	267	7	3,241	2	120	0	0
Median Family Income 70-80%	12	348	2	299	2	1,106	3	809	0	0
Median Family Income 80-90%	10	338	2	310	1	325	1	160	0	0
Median Family Income 90-100%	9	219	1	131	0	0	3	188	0	0
Median Family Income 100-110%	33	1,271	7	1,321	6	2,589	7	1,097	0	0
Median Family Income 110-120%	6	278	2	275	1	472	2	169	0	0
Median Family Income ≥ 120%	111	3,410	20	3,055	17	6,973	40	5,650	0	0
Median Family Income Not Known	1	78	2	238	1	325	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	205	6,733	48	7,354	39	16,750	60	8,539	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
DENTON COUNTY (121), TX										
MSA 19124										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	1	250	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	1	150	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	2	30	0	0	0	0	0	0	0	0
Median Family Income ≥ 120%	12	455	2	435	4	1,095	5	896	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	14	485	4	835	4	1,095	5	896	0	0
GRAYSON COUNTY (181), TX										
MSA 43300										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	34	0	0	0	0	0	0	0	0
Upper Income	1	7	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	41	0	0	0	0	0	0	0	0



## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
GREGG COUNTY (183), TX										
MSA 30980										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	21	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	21	0	0	0	0	0	0	0	0
HARRIS COUNTY (201), TX										
MSA 26420										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income ≥ 120%	1	26	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	26	0	0	0	0	0	0	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
HENDERSON COUNTY (213), TX										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	19	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	19	0	0	0	0	0	0	0	0
ROCKWALL COUNTY (397), TX										
MSA 19124										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	2	43	0	0	0	0	1	29	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	43	0	0	0	0	1	29	0	0
SMITH COUNTY (423), TX										
MSA 46340										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	1	16	0	0	1	594	1	594	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	16	0	0	1	594	1	594	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
TARRANT COUNTY (439), TX										
MSA 23104										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	2	107	0	0	0	0	0	0	0	0
Median Family Income 70-80%	1	35	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	1	200	0	0	1	200	0	0
Median Family Income 110-120%	1	17	0	0	0	0	1	17	0	0
Median Family Income ≥ 120%	9	414	0	0	6	2,389	6	981	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	13	573	1	200	6	2,389	8	1,198	0	0
TOTAL INSIDE AA IN STATE	319	10,966	66	10,535	72	29,859	107	15,320	0	0
TOTAL OUTSIDE AA IN STATE	35	1,224	5	1,035	11	4,078	15	2,717	0	0
STATE TOTAL	354	12,190	71	11,570	83	33,937	122	18,037	0	0
TOTAL ACROSS ALL STATES										
TOTAL INSIDE AA	319	10,966	66	10,535	72	29,859	107	15,320	0	0
TOTAL OUTSIDE AA	39	1,355	6	1,176	12	4,678	15	2,717	0	0
TOTAL INSIDE & OUTSIDE	358	12,321	72	11,711	84	34,537	122	18,037	0	0

Loans by County

Small Farm Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Farms with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
COLLIN COUNTY (085), TX										
MSA 19124										
Inside AA 0001										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	1	200	0	0	1	200	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income ≥ 120%	0	0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	1	200	0	0	1	200	0	0
PALO PINTO COUNTY (363), TX										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	1	8	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	8	0	0	0	0	0	0	0	0

Loans by County

Small Farm Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Farms with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
SUTTON COUNTY (435), TX										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	1	168	1	376	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	1	168	1	376	0	0	0	0
VAN ZANDT COUNTY (467), TX										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	2	90	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	2	90	0	0	0	0	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	1	200	0	0	1	200	0	0
TOTAL OUTSIDE AA IN STATE	3	98	1	168	1	376	0	0	0	0
STATE TOTAL	3	98	2	368	1	376	1	200	0	0
TOTAL ACROSS ALL STATES										
TOTAL INSIDE AA	0	0	1	200	0	0	1	200	0	0
TOTAL OUTSIDE AA	3	98	1	168	1	376	0	0	0	0
TOTAL INSIDE & OUTSIDE	3	98	2	368	1	376	1	200	0	0

2021 Institution Disclosure Statement - Table 3  
Assessment Area/Non-Assessment Area Activity  
Small Business Loans  
Institution: North Dallas Bank & Trust Co.

PAGE: 1 OF 1  
Respondent ID: 0000018355  
Agency: FDIC - 3

ASSESSMENT AREA LOANS	Originations		Originations to Businesses with <= \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
TX - COLLIN COUNTY (085) - MSA 19124	165	20,523	47	6,781	0	0
TX - DALLAS COUNTY (113) - MSA 19124	292	30,837	60	8,539	0	0

2021 Institution Disclosure Statement - Table 4  
Assessment Area/Non-Assessment Area Activity  
Small Farm Loans  
Institution: North Dallas Bank & Trust Co.

Respondent ID: 0000018355  
Agency: FDIC - 3

ASSESSMENT AREA LOANS	Originations		Originations to Farms with ≤ \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
TX - COLLIN COUNTY (085) - MSA 19124	1	200	1	200	0	0

2021 Institution Disclosure Statement - Table 5  
Community Development/Consortium-Third Party Activity  
Institution: North Dallas Bank & Trust Co.

Respondent ID: 0000018355  
Agency: FDIC - 3

Memo Item: Loans by Affiliates				
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
Community Development Loans				
Originated	28	60,938	0	0
Purchased	0	0	0	0
Total	28	60,938	0	0
Consortium/Third Party Loans (optional)				
Originated	0	0		
Purchased	0	0		
Total	0	0		



2021 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

\* denotes no loans made in specified tracts

Institution: North Dallas Bank & Trust Co.

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Respondent ID: 0000018355

Agency: FDIC - 3

ASSESSMENT AREA - 0001

COLLIN COUNTY (085), TX

MSA: 19124

Median Family Income 30-40%

0317.20

Median Family Income 40-50%

0319.00

Median Family Income 50-60%

0309.00\* 0320.10\*

Median Family Income 60-70%

0308.02\* 0310.03 0315.06 0316.24 0317.14\* 0320.03\* 0320.04\*

Median Family Income 70-80%

0304.06 0307.01 0307.02\* 0320.12\* 0320.13\*

Median Family Income 80-90%

0301.00\* 0306.03\* 0308.01\* 0310.01\* 0310.04\* 0316.29\* 0316.35\*

Median Family Income 90-100%

0311.00 0315.08\* 0316.11 0316.34\* 0316.58 0317.12\*

Median Family Income 100-110%

0302.03 0304.05\* 0304.08 0312.01\* 0313.10\*

Median Family Income 110-120%

0305.05 0306.05 0316.12\* 0316.27\* 0316.28\* 0316.33\* 0316.60 0317.19\* 0318.06\* 0320.08\*

Median Family Income >= 120%

0302.01\* 0302.02 0303.01 0303.02 0303.03 0303.04\* 0303.05 0304.03 0304.04 0304.07 0305.04

0305.06\* 0305.07\* 0305.08\* 0305.09\* 0305.10\* 0305.11 0305.12\* 0305.13 0305.14 0305.15\* 0305.16\*

0305.17 0305.18 0305.19\* 0305.20 0305.21\* 0305.22\* 0305.23\* 0305.24\* 0305.25\* 0305.26 0305.27\*

0305.28\* 0305.29 0305.30 0305.31\* 0306.01\* 0306.04\* 0312.02\* 0313.08\* 0313.09\* 0313.11\* 0313.12\*

0313.13\* 0313.14 0313.15 0313.16\* 0313.17\* 0314.05 0314.06 0314.07 0314.08\* 0314.09\* 0314.10\*

0314.11\* 0315.04\* 0315.05 0315.07\* 0316.13 0316.21 0316.22\* 0316.23\* 0316.25\* 0316.26\* 0316.30

0316.31\* 0316.32 0316.36\* 0316.37\* 0316.38\* 0316.39\* 0316.40 0316.41\* 0316.42\* 0316.43\* 0316.45

2021 Institution Disclosure Statement - Table 6

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Assessment Area(s) by Tract

Respondent ID: 0000018355

\* denotes no loans made in specified tracts

Agency: FDIC - 3

Institution: North Dallas Bank & Trust Co.

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0316.46	0316.47	0316.48	0316.49	0316.52	0316.53	0316.54	0316.55	0316.56	0316.57	0316.59
0316.61	0316.62*	0316.63	0316.64*	0317.04	0317.06	0317.08	0317.09	0317.11	0317.15	0317.16*
0317.17*	0317.18*	0318.02*	0318.04	0318.05*	0318.07	0320.09*	0320.11*			

Median Family Income Not Known

0317.13\*

DALLAS COUNTY (113), TX

MSA: 19124

Median Family Income 20-30%

0015.03*	0039.01*	0041.00*	0086.04*	0087.01*	0093.04*	0192.13*	0205.00*			
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Median Family Income 30-40%

0027.01*	0040.00*	0047.00*	0049.00*	0055.00*	0060.02*	0069.00*	0072.02*	0078.11*	0078.15	0078.18*
0078.20*	0078.21*	0078.23	0086.03*	0088.02*	0096.10*	0098.04*	0106.02*	0108.04*	0109.04*	0111.05*
0114.01*	0115.00*	0122.08*	0123.02*	0137.13*	0143.09*	0166.05*	0166.07*	0185.03*	0185.06	0190.13*
0190.35	0192.08	0192.12*								

Median Family Income 40-50%

0004.05*	0006.01*	0009.00*	0014.00*	0025.00*	0027.02*	0034.00*	0037.00*	0038.00*	0043.00*	0048.00*
0054.00*	0056.00*	0057.00*	0059.01*	0059.02*	0067.00*	0068.00*	0072.01*	0078.19*	0078.27*	0087.03*
0087.04*	0087.05*	0088.01*	0089.00*	0090.00*	0092.02*	0101.01*	0109.03*	0111.04*	0116.01*	0117.02*
0120.00*	0122.10*	0122.11*	0126.04*	0130.10*	0130.11	0131.05*	0136.23*	0136.25	0141.03	0141.14*
0143.08	0146.03*	0150.00*	0154.04*	0159.00*	0160.02*	0169.03*	0170.04*	0172.01*	0176.05*	0177.03*
0181.41	0184.03*	0185.05*	0190.14*	0190.16	0190.33*	0202.00*	0203.00*			

Median Family Income 50-60%

0004.01*	0012.04*	0013.02*	0015.02*	0020.00	0024.00*	0039.02*	0042.01*	0051.00*	0052.00*	0053.00*
0060.01*	0061.00*	0062.00*	0063.02*	0065.01*	0084.00*	0085.00*	0091.01*	0091.03*	0091.04*	0092.01*
0093.01*	0093.03*	0098.02*	0101.02*	0105.00*	0106.01*	0107.04*	0108.01*	0108.05*	0111.03*	0116.02*
0117.01*	0118.00*	0119.00*	0121.00*	0122.07*	0123.01*	0127.01*	0127.02*	0136.15	0137.17*	0137.25
0141.16*	0141.33*	0142.04*	0144.03*	0144.07*	0145.02*	0146.02*	0147.01*	0147.02*	0147.03*	0149.01*
0152.02*	0152.05*	0153.03*	0154.03*	0157.00*	0158.00*	0161.00*	0165.11*	0165.20*	0169.02*	0170.03*
0171.02*	0172.02*	0176.04*	0177.04*	0178.04*	0178.06*	0179.00*	0181.05*	0181.30*	0182.04*	0182.06*

### Assessment Area(s) by Tract

Institution: North Dallas Bank & Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

0183.00*	0184.01*	0185.01	0187.00*	0189.00*	0190.19*	0190.21*	0190.34*	0199.00*	0201.00	
Median Family Income 60-70%										
0004.06	0008.00*	0015.04	0016.00*	0045.00*	0050.00*	0063.01	0064.02*	0065.02*	0071.02*	0078.04
0091.05*	0096.05*	0099.00	0107.01*	0107.03*	0109.02*	0113.00*	0125.00*	0126.01*	0137.11*	0137.18
0138.05*	0139.01	0143.10*	0146.01*	0149.02*	0151.00	0153.04*	0153.05*	0155.00*	0156.00*	0160.01*
0162.01*	0162.02*	0163.02*	0164.06*	0164.07*	0165.16*	0166.21*	0166.26*	0167.01*	0167.04*	0171.01*
0174.00*	0176.02*	0176.06*	0178.05*	0178.07*	0178.13*	0180.02*	0181.27*	0181.38*	0182.05*	0188.01*
0188.02*	0190.04*	0190.18*	0190.29*	0190.32*						
Median Family Income 70-80%										
0064.01*	0078.22	0079.09*	0094.01*	0096.11	0097.01*	0100.00	0108.03*	0110.01*	0110.02*	0111.01*
0112.00*	0126.03*	0136.24*	0136.26	0137.14*	0141.13*	0142.03*	0143.02*	0143.06*	0144.05*	0144.08
0152.06*	0165.02	0165.09*	0165.17*	0165.21*	0166.19*	0167.05*	0168.03*	0168.04*	0170.01*	0173.01*
0177.02*	0180.01*	0181.28*	0182.03	0186.00*	0190.28*	0192.02*				
Median Family Income 80-90%										
0042.02*	0078.26*	0096.04	0098.03	0122.04*	0122.06*	0122.09*	0130.07*	0136.21*	0136.22	0137.15*
0137.20*	0137.22	0138.04*	0139.02*	0141.15*	0143.07*	0144.06*	0152.04*	0163.01*	0164.08*	0165.10*
0165.18*	0166.06*	0166.10*	0166.18*	0167.03*	0175.00*	0181.11*	0181.26*	0181.29*	0181.42	0184.02*
0190.24*	0190.27*	0190.40*	0191.00	0192.04						
Median Family Income 90-100%										
0012.02*	0021.00*	0078.25	0079.10*	0079.11*	0079.13*	0079.14	0137.12*	0137.16	0137.19*	0140.01
0141.31	0141.36	0145.01	0165.22*	0166.11*	0166.15*	0166.16*	0166.22*	0173.06*	0178.08	0181.18*
0181.21*	0181.37*	0190.20*	0190.26*	0192.11						
Median Family Income 100-110%										
0012.03*	0078.09*	0082.00*	0128.00*	0130.09*	0136.06	0136.16	0136.20	0138.06	0141.32*	0143.11*
0143.12	0153.06*	0154.01*	0164.01*	0164.11*	0165.14	0165.19*	0166.20	0166.23*	0173.03*	0173.05*
0178.11*	0178.12*	0178.14*	0181.20*	0181.23*	0181.32*	0181.33*	0181.39*	0190.23*	0190.42*	0192.06*
Median Family Income 110-120%										
0011.01*	0022.00*	0046.00*	0124.00*	0136.09	0137.27	0166.25*	0168.02*	0181.04*	0181.10*	0181.35*
0204.00										
Median Family Income >= 120%										

2021 Institution Disclosure Statement - Table 6

PAGE: 4 OF 7

Assessment Area(s) by Tract

Respondent ID: 0000018355

\* denotes no loans made in specified tracts

Agency: FDIC - 3

Institution: North Dallas Bank & Trust Co.

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0001.00	0002.01*	0002.02*	0003.00	0005.00	0006.03*	0006.05	0006.06	0007.01*	0007.02*	0010.01*
0010.02*	0011.02*	0013.01*	0017.03*	0017.04	0018.00	0019.00*	0031.01*	0044.00*	0071.01*	0073.01
0073.02	0076.01	0076.04	0076.05*	0077.00*	0078.01	0078.05	0078.10	0078.12	0078.24*	0079.02*
0079.03*	0079.06	0079.12	0080.00*	0081.00	0094.02	0095.00*	0096.03	0096.07*	0096.08*	0096.09
0097.02*	0129.00*	0130.04*	0130.05*	0130.08*	0131.01	0131.02	0131.04*	0132.00	0133.00	0134.00
0135.00	0136.05	0136.07	0136.08	0136.10*	0136.11	0136.17	0136.18*	0136.19	0137.21*	0137.26*
0138.03	0141.19	0141.20*	0141.21*	0141.23*	0141.24	0141.26	0141.27	0141.28*	0141.29*	0141.30
0141.34	0141.35*	0141.37	0141.38*	0142.05	0142.06	0164.09*	0164.10*	0164.12*	0164.13*	0165.13*
0165.23*	0166.12*	0166.17*	0166.24*	0173.04*	0181.22*	0181.24	0181.34*	0181.36*	0181.40*	0190.25*
0190.31*	0190.36*	0190.37*	0190.38	0190.39	0190.41	0190.43*	0192.03*	0192.05*	0192.10	0193.01*
0193.02	0194.00*	0195.01	0195.02	0196.00*	0197.00*	0198.00	0200.00	0206.00	0207.00	

Median Family Income Not Known

0004.04\* 0017.01\* 0140.02 9800.00\* 9801.00\*

OUTSIDE ASSESSMENT AREA

MISSOULA COUNTY (063), MT

MSA: 33540

Low Income

0003.00

CLARK COUNTY (003), NV

MSA: 29820

Median Family Income >= 120%

0058.24

WAKE COUNTY (183), NC

MSA: 39580

Median Family Income >= 120%

0532.03

LINCOLN COUNTY (081), OK

MSA: 36420

Middle Income

## Institution: North Dallas Bank &amp; Trust Co.

Agency: FDIC - 3

MSA: 26420

2021 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

\* denotes no loans made in specified tracts

Institution: North Dallas Bank & Trust Co.

PAGE: 6 OF 7

Respondent ID: 0000018355

Agency: FDIC - 3

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Median Family Income >= 120%

3415.02

HENDERSON COUNTY (213), TX

MSA: NA

Middle Income

9502.00

PALO PINTO COUNTY (363), TX

MSA: NA

Middle Income

0002.00

ROCKWALL COUNTY (397), TX

MSA: 19124

Middle Income

0403.02 0404.02

SMITH COUNTY (423), TX

MSA: 46340

Upper Income

0019.05 0019.06

SUTTON COUNTY (435), TX

MSA: NA

Middle Income

9503.00

TARRANT COUNTY (439), TX

MSA: 23104

Median Family Income 60-70%

1137.05

Median Family Income 70-80%

1065.03

2021 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

\* denotes no loans made in specified tracts

Institution: North Dallas Bank & Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

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Median Family Income 100-110%

1109.05

Median Family Income 110-120%

1135.17

Median Family Income >= 120%

1022.02 1115.49 1136.23 1137.09 1139.06 1139.07 1139.08 1139.09 1139.10 1230.00

VAN ZANDT COUNTY (467), TX

MSA: NA

Middle Income

9503.00 9510.00

2021 Institution Disclosure Statement - Table E-1

PAGE: 1 OF 1

Error Status Information

Respondent ID: 0000018355

Institution: North Dallas Bank & Trust Co.

Agency: FDIC - 3

Record Identifier: <sup>11</sup>	Total Composite Records on File	Total Composite Records Without Errors	Total Validity <sup>10</sup> Errors	Percentage of Validity Errors
Transmittal Sheet	1	1	0	0.00%
Small Business Loans	223	223	0	0.00%
Small Farm Loans	5	5	0	0.00%
Community Development Loans	1	1	0	0.00%
Consortium/Third Party Loans (Optional)	1	1	0	0.00%
Assessment Area	2	2	0	0.00%
Total	233	233	0	0.00%

Footnote:

10. A validity edit helps to verify the accuracy of the data reported. An institution's CRA submission that passes all validity edits does not ensure 100% accurate data. True accuracy is determined during the examination process.

11. A record represents one row of data reported to the Federal Reserve Board. This does not in any way represent the number of loans originated or purchased by the institution.



## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: HAWAII (15)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
HONOLULU COUNTY (003), HI										
MSA 46520										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	1	572	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income ≥ 120%	0	0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	572	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	1	572	0	0	0	0
STATE TOTAL	0	0	0	0	1	572	0	0	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: OKLAHOMA (40)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
OKLAHOMA COUNTY (109), OK										
MSA 36420										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	1	41	0	0	1	500	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income ≥ 120%	0	0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	41	0	0	1	500	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	1	41	0	0	1	500	0	0	0	0
STATE TOTAL	1	41	0	0	1	500	0	0	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
COLLIN COUNTY (085), TX										
MSA 19124										
Inside AA 0001										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	1	800	1	800	0	0
Median Family Income 70-80%	6	257	0	0	1	600	0	0	0	0
Median Family Income 80-90%	0	0	0	0	2	2,000	2	2,000	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	1	100	0	0	0	0	1	100	0	0
Median Family Income 110-120%	2	188	1	250	2	1,000	2	188	0	0
Median Family Income ≥ 120%	7	495	1	200	3	1,130	6	856	0	0
Median Family Income Not Known	1	75	2	204	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	17	1,115	4	654	9	5,530	12	3,944	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
DALLAS COUNTY (113), TX										
MSA 19124										
Inside AA 0001										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	1	400	0	0	0	0
Median Family Income 50-60%	6	321	3	460	5	3,305	2	1,405	0	0
Median Family Income 60-70%	2	104	1	150	0	0	2	184	0	0
Median Family Income 70-80%	4	237	6	750	1	750	0	0	0	0
Median Family Income 80-90%	2	93	1	182	1	560	2	190	0	0
Median Family Income 90-100%	2	109	1	200	1	265	2	259	0	0
Median Family Income 100-110%	12	409	2	450	1	975	2	71	0	0
Median Family Income 110-120%	5	340	1	150	1	1,000	0	0	0	0
Median Family Income ≥ 120%	16	907	5	797	9	4,578	16	3,809	0	0
Median Family Income Not Known	1	49	0	0	1	608	2	657	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	50	2,569	20	3,139	21	12,441	28	6,575	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
DENTON COUNTY (121), TX										
MSA 19124										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income ≥ 120%	1	85	2	350	0	0	1	85	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	85	2	350	0	0	1	85	0	0
FREESTONE COUNTY (161), TX										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	2	315	0	0	2	315	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	2	315	0	0	2	315	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
MONTAGUE COUNTY (337), TX										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	1	133	0	0	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	1	133	0	0	0	0	0	0
MONTGOMERY COUNTY (339), TX										
MSA 26420										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	1	600	1	600	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income ≥ 120%	0	0	0	0	0	0	0	0	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	600	1	600	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
ROCKWALL COUNTY (397), TX										
MSA 19124										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	0	0	0	0	0	0
Upper Income	0	0	0	0	1	437	1	437	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	437	1	437	0	0
TARRANT COUNTY (439), TX										
MSA 23104										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	1	288	1	288	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	1	600	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income ≥ 120%	1	100	2	325	6	3,293	4	1,262	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	1	100	2	325	8	4,181	5	1,550	0	0

## Loans by County

## Small Business Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Businesses with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
TRAVIS COUNTY (453), TX										
MSA 12420										
Outside Assessment Area										
Median Family Income < 10%	0	0	0	0	0	0	0	0	0	0
Median Family Income 10-20%	0	0	0	0	0	0	0	0	0	0
Median Family Income 20-30%	0	0	0	0	0	0	0	0	0	0
Median Family Income 30-40%	0	0	0	0	0	0	0	0	0	0
Median Family Income 40-50%	0	0	0	0	0	0	0	0	0	0
Median Family Income 50-60%	0	0	0	0	0	0	0	0	0	0
Median Family Income 60-70%	0	0	0	0	0	0	0	0	0	0
Median Family Income 70-80%	0	0	0	0	0	0	0	0	0	0
Median Family Income 80-90%	0	0	0	0	0	0	0	0	0	0
Median Family Income 90-100%	0	0	0	0	0	0	0	0	0	0
Median Family Income 100-110%	0	0	0	0	0	0	0	0	0	0
Median Family Income 110-120%	0	0	0	0	0	0	0	0	0	0
Median Family Income ≥ 120%	0	0	0	0	1	500	1	500	0	0
Median Family Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	1	500	1	500	0	0
TOTAL INSIDE AA IN STATE	67	3,684	24	3,793	30	17,971	40	10,519	0	0
TOTAL OUTSIDE AA IN STATE	2	185	7	1,123	11	5,718	11	3,487	0	0
STATE TOTAL	69	3,869	31	4,916	41	23,689	51	14,006	0	0
TOTAL ACROSS ALL STATES										
TOTAL INSIDE AA	67	3,684	24	3,793	30	17,971	40	10,519	0	0
TOTAL OUTSIDE AA	3	226	7	1,123	13	6,790	11	3,487	0	0
TOTAL INSIDE & OUTSIDE	70	3,910	31	4,916	43	24,761	51	14,006	0	0



Loans by County

Small Farm Loans - Originations

Institution: North Dallas Bank &amp; Trust Co.

Respondent ID: 0000018355

Agency: FDIC - 3

State: TEXAS (48)

Area Income Characteristics	Loan Amount at Origination ≤\$100,000		Loan Amount at Origination >\$100,000 But ≤\$250,000		Loan Amount at Origination >\$250,000		Loans to Farms with Gross Annual Revenues ≤ \$1 Million		Memo Item: Loans by Affiliates	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
VAN ZANDT COUNTY (467), TX										
MSA NA										
Outside Assessment Area										
Low Income	0	0	0	0	0	0	0	0	0	0
Moderate Income	0	0	0	0	0	0	0	0	0	0
Middle Income	0	0	0	0	2	715	0	0	0	0
Upper Income	0	0	0	0	0	0	0	0	0	0
Income Not Known	0	0	0	0	0	0	0	0	0	0
Tract Not Known	0	0	0	0	0	0	0	0	0	0
County Total	0	0	0	0	2	715	0	0	0	0
TOTAL INSIDE AA IN STATE	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA IN STATE	0	0	0	0	2	715	0	0	0	0
STATE TOTAL	0	0	0	0	2	715	0	0	0	0
TOTAL ACROSS ALL STATES										
TOTAL INSIDE AA	0	0	0	0	0	0	0	0	0	0
TOTAL OUTSIDE AA	0	0	0	0	2	715	0	0	0	0
TOTAL INSIDE & OUTSIDE	0	0	0	0	2	715	0	0	0	0

2022 Institution Disclosure Statement - Table 3  
Assessment Area/Non-Assessment Area Activity  
Small Business Loans  
Institution: North Dallas Bank & Trust Co.

PAGE: 1 OF 1  
Respondent ID: 0000018355  
Agency: FDIC - 3

ASSESSMENT AREA LOANS	Originations		Originations to Businesses with <= \$1 million revenue		Purchases	
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
TX - COLLIN COUNTY (085) - MSA 19124	30	7,299	12	3,944	0	0
TX - DALLAS COUNTY (113) - MSA 19124	91	18,149	28	6,575	0	0

Memo Item: Loans by Affiliates				
	Num of Loans	Amount (000s)	Num of Loans	Amount (000s)
Community Development Loans				
Originated	17	81,652	0	0
Purchased	0	0	0	0
Total	17	81,652	0	0
Consortium/Third Party Loans (optional)				
Originated	0	0		
Purchased	0	0		
Total	0	0		

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

\* denotes no loans made in specified tracts

Institution: North Dallas Bank & Trust Co.

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Respondent ID: 0000018355

Agency: FDIC - 3

ASSESSMENT AREA - 0001

COLLIN COUNTY (085), TX

MSA: 19124

Median Family Income 40-50%

0317.20\* 0317.23\*

Median Family Income 50-60%

0304.09\* 0320.12\*

Median Family Income 60-70%

0305.40\* 0308.01\* 0308.02 0309.03\* 0310.08\* 0315.11\* 0317.24\* 0318.09\* 0320.03\* 0320.13\* 0320.14\*

Median Family Income 70-80%

0301.02\* 0313.19\* 0316.24\* 0319.01\* 0319.02 0320.10\*

Median Family Income 80-90%

0301.01\* 0302.05\* 0304.05\* 0307.02 0310.05\* 0310.06\* 0316.34\* 0316.65\* 0317.22\* 0318.06\* 0320.15\*

Median Family Income 90-100%

0304.06\* 0306.05\* 0307.01\* 0310.03\* 0310.07\* 0315.12\* 0316.21\* 0316.23\* 0316.27\* 0316.29\* 0316.35\*

Median Family Income 100-110%

0302.01\* 0302.07\* 0304.10\* 0306.06\* 0311.01\* 0313.31\* 0314.23\* 0316.11\* 0316.28\* 0316.32\* 0316.57\*

0316.71 0316.73\* 0317.13\* 0318.07\* 0318.11\* 0320.08\*

Median Family Income 110-120%

0302.04\* 0305.05 0311.02\* 0312.01\* 0313.23\* 0313.32\* 0314.13\* 0314.20\* 0314.22\* 0314.24\* 0315.04\*

0315.07\* 0315.08\* 0316.30\* 0316.31\* 0316.59\* 0316.72 0317.08 0317.09\* 0318.08\* 0318.12\* 0318.16\*

0320.17\*

Median Family Income >= 120%

0302.02\* 0302.06\* 0303.01\* 0303.02\* 0303.03 0303.04\* 0303.06\* 0303.07 0304.03\* 0304.04\* 0304.07\*

0305.04 0305.06\* 0305.07\* 0305.09\* 0305.10\* 0305.11\* 0305.12\* 0305.15\* 0305.16\* 0305.17\* 0305.18\*

0305.19 0305.20\* 0305.21\* 0305.24\* 0305.25\* 0305.29\* 0305.31\* 0305.32\* 0305.33\* 0305.34\* 0305.35\*

0305.36\* 0305.37\* 0305.38\* 0305.39\* 0305.41\* 0305.42\* 0305.44\* 0305.45\* 0305.46\* 0305.47\* 0305.48\*

0305.49\* 0305.50\* 0306.04\* 0306.07\* 0306.08\* 0306.09\* 0312.02\* 0313.08\* 0313.14\* 0313.18\* 0313.20\*

0313.21\* 0313.22\* 0313.24\* 0313.25\* 0313.26\* 0313.27\* 0313.28\* 0313.29\* 0313.30\* 0313.33\* 0313.34\*

2022 Institution Disclosure Statement - Table 6

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Assessment Area(s) by Tract

Respondent ID: 0000018355

\* denotes no loans made in specified tracts

Agency: FDIC - 3

Institution: North Dallas Bank & Trust Co.

0313.35*	0313.36*	0314.08*	0314.11*	0314.12*	0314.14*	0314.15*	0314.16	0314.17*	0314.18*	0314.19*
0314.21*	0314.25*	0315.09*	0315.10*	0316.13	0316.22*	0316.25*	0316.26*	0316.33*	0316.36*	0316.39*
0316.41*	0316.42*	0316.43*	0316.45*	0316.46*	0316.47*	0316.49	0316.54*	0316.55*	0316.60*	0316.61*
0316.62*	0316.63*	0316.64*	0316.66*	0316.67*	0316.68*	0316.69*	0316.74*	0316.75*	0316.76*	0316.77*
0316.78*	0316.79*	0316.80*	0316.81*	0316.82*	0317.04	0317.06*	0317.11*	0317.15*	0317.16*	0317.17*
0317.18	0317.19*	0317.21*	0318.10*	0318.14*	0318.15*	0319.03*	0319.04*	0320.16*	0320.18*	0320.19*

Median Family Income Not Known

0305.43\* 0309.01\* 0309.02\* 0316.70 0318.13\*

DALLAS COUNTY (113), TX

MSA: 19124

Median Family Income 20-30%

0072.06\* 0087.04\* 0093.04\* 0115.00\* 0166.35\* 9802.00\*

Median Family Income 30-40%

0020.02*	0037.00*	0057.00*	0072.04*	0072.05*	0078.19*	0078.30*	0078.32*	0078.33*	0086.04*	0087.01*
0087.03*	0109.04*	0109.05*	0111.04*	0114.01*	0121.01*	0122.08*	0136.29*	0151.02*	0160.02*	0166.07*
0167.09*	0170.09*	0178.15*	0185.06*	0190.13*	0190.35*	0192.12*	0192.13*	0208.00*	0210.00*	0211.00*

Median Family Income 40-50%

0004.05*	0015.03*	0027.03*	0054.00*	0059.01*	0059.02*	0060.02*	0072.03*	0078.15*	0078.21*	0078.27*
0078.34*	0078.35*	0088.01*	0088.02*	0090.02*	0091.03*	0092.02*	0092.04*	0093.03*	0098.04*	0100.01*
0101.01*	0106.02*	0107.01*	0107.04*	0108.04*	0108.08*	0108.09*	0109.03*	0111.03*	0111.05*	0116.01*
0117.01*	0118.01*	0120.00*	0122.11*	0123.02*	0125.02*	0126.04*	0130.10*	0130.11*	0131.07*	0136.15
0141.47*	0143.09*	0144.09*	0152.05*	0152.08*	0154.04*	0160.01*	0162.03*	0163.02*	0165.18*	0167.06*
0167.10*	0167.11*	0168.03*	0169.02*	0170.07*	0170.10*	0172.01*	0177.03*	0177.05*	0185.05*	0185.08*
0190.19*	0202.00*									

Median Family Income 50-60%

0004.07*	0008.01*	0015.02*	0025.00*	0045.00*	0048.00*	0050.00*	0053.00*	0056.00*	0060.01*	0061.00*
0064.02*	0067.01*	0067.02*	0068.00*	0078.28*	0078.29	0078.31*	0084.01*	0087.05*	0090.01*	0091.05*
0093.01*	0096.10*	0098.02*	0101.02*	0105.00*	0109.06*	0110.04*	0118.02*	0119.01*	0119.02*	0121.02*
0122.07*	0126.01	0127.01*	0127.02*	0136.25	0136.26*	0136.31*	0137.28*	0141.46*	0141.53*	0141.58*

## 2022 Institution Disclosure Statement - Table 6

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## Assessment Area(s) by Tract

Respondent ID: 0000018355

\* denotes no loans made in specified tracts

Agency: FDIC - 3

Institution: North Dallas Bank &amp; Trust Co.

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0141.61*	0142.04*	0143.08*	0144.05*	0144.07*	0144.10*	0147.01*	0147.04*	0153.03*	0153.04*	0159.00*
0161.00*	0162.04*	0165.16*	0165.26*	0165.33*	0165.34*	0165.36*	0166.34*	0167.07*	0171.01*	0172.04*
0176.04*	0176.05*	0176.06*	0177.04*	0178.05*	0181.30*	0181.38*	0181.41*	0182.04*	0182.06*	0183.00*
0184.01*	0184.03*	0187.00*	0188.02*	0190.16*	0190.32*	0190.34*	0190.47*	0192.08*	0203.00*	0205.00
0212.00*										
Median Family Income 60-70%										
0004.01*	0004.10*	0006.10*	0008.02*	0012.04*	0014.00*	0015.04*	0024.00*	0043.00*	0047.00*	0051.00*
0055.00*	0062.00*	0069.00*	0078.23*	0084.02*	0085.00*	0092.03*	0108.05*	0108.07*	0110.02*	0112.01*
0113.00*	0116.03*	0116.04*	0117.02*	0122.10*	0122.12*	0124.00*	0136.27*	0137.17*	0137.18*	0137.25
0137.29*	0139.01*	0141.40*	0141.45*	0143.16*	0143.19*	0144.06*	0144.08	0145.02*	0146.01	0146.02*
0146.03*	0152.02*	0154.03*	0156.00*	0157.00*	0164.07*	0164.16*	0164.21*	0165.35*	0166.19*	0166.26*
0167.04*	0169.03*	0170.05*	0171.02*	0172.03*	0173.15*	0174.00*	0176.02*	0178.17*	0179.00*	0180.02*
0181.27*	0182.05*	0185.07*	0188.01*	0189.00*	0190.18*	0190.20*	0190.28*	0190.33*	0190.45*	0192.11*
0192.14*	0199.00*	0201.00*								
Median Family Income 70-80%										
0004.09	0063.01*	0063.02*	0064.01*	0065.01*	0065.02*	0071.02*	0091.01*	0091.04*	0096.05*	0098.03
0106.01*	0110.03*	0111.01*	0112.02*	0123.01*	0125.01*	0128.01*	0136.21*	0136.30*	0138.05*	0141.60*
0143.06*	0143.15*	0149.03*	0150.01*	0150.02*	0152.06*	0153.05*	0162.01*	0163.01*	0165.11*	0165.17*
0165.22*	0165.27*	0165.28*	0166.21*	0166.38*	0170.06*	0178.06*	0178.16*	0178.18*	0178.19*	0180.01*
0181.05*	0181.21*	0181.28*	0181.29*	0182.03*	0185.01	0186.00*	0190.27*	0190.29*	0190.49*	
Median Family Income 80-90%										
0012.02*	0078.09*	0078.25*	0096.04	0097.01*	0099.00*	0122.06*	0136.09	0136.20*	0137.19*	0137.20*
0141.32*	0141.48*	0142.03*	0142.08	0143.10*	0151.01*	0155.00*	0164.06*	0164.18*	0164.19*	0165.19*
0165.21*	0165.29*	0165.30*	0165.31*	0166.10*	0166.18*	0166.22*	0166.37*	0168.02*	0168.06*	0170.08*
0173.12*	0175.00*	0178.08*	0181.11*	0181.35*	0181.48*	0181.57*	0184.02*	0190.26*	0190.40*	0190.44*
0190.46*	0192.02*	0209.00*								
Median Family Income 90-100%										
0020.01*	0022.00*	0052.00*	0078.05*	0078.22	0078.26*	0079.09*	0082.00*	0094.01*	0122.09*	0126.03*
0130.07*	0131.06*	0136.24*	0137.15*	0137.22*	0137.27*	0138.04*	0139.02*	0141.39*	0141.41*	0141.44*

## 2022 Institution Disclosure Statement - Table 6

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## Assessment Area(s) by Tract

Respondent ID: 0000018355

\* denotes no loans made in specified tracts

Agency: FDIC - 3

Institution: North Dallas Bank &amp; Trust Co.

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0141.52*	0141.57*	0143.13*	0143.17*	0152.07*	0153.06*	0154.05*	0164.17*	0166.16*	0166.24*	0166.27*
0166.28*	0166.29*	0166.32*	0166.33*	0173.09*	0177.06*	0178.11*	0178.12	0178.14*	0178.20*	0181.10*
0181.20*	0181.26	0181.32*	0181.52*	0190.41*	0190.42*	0190.52*	0191.02*	0192.16*	0204.01*	0207.00*
Median Family Income 100-110%										
0004.08*	0013.02*	0081.01*	0096.11*	0108.06*	0122.13*	0128.02*	0132.02	0136.06*	0137.16*	0140.01
0141.21*	0141.54*	0143.18*	0164.10*	0166.15*	0166.20*	0166.23*	0166.36*	0168.05*	0173.10*	0173.11*
0173.13*	0173.14*	0181.33*	0181.34*	0181.37*	0181.42*	0181.51*	0181.54*	0190.25*	0190.31*	0190.39
0190.48*	0190.53									
Median Family Income 110-120%										
0018.02*	0042.01*	0079.14*	0136.28	0137.26*	0138.06	0138.07*	0141.30*	0143.20*	0145.01*	0154.06*
0164.20*	0165.32*	0166.30*	0167.08*	0173.08*	0181.50*	0181.56*	0190.23*	0190.24*	0190.37*	0191.01*
0192.15*										
Median Family Income >= 120%										
0001.00	0002.01*	0002.02*	0005.02	0005.03*	0006.05	0006.06*	0006.07*	0006.08*	0006.09*	0007.03*
0007.04*	0007.05*	0007.06*	0009.01*	0010.01*	0010.02*	0011.01*	0011.02*	0012.03*	0013.01*	0016.02*
0017.03*	0017.05*	0019.01*	0019.02*	0021.00*	0031.02*	0031.03*	0042.02*	0044.00*	0046.00*	0071.01*
0073.01*	0073.02*	0076.01	0076.04	0076.05*	0077.01*	0077.02*	0078.01	0078.10	0078.12*	0078.24
0079.02*	0079.03*	0079.06*	0079.10*	0079.12*	0079.13*	0079.16*	0080.00*	0081.02*	0094.02*	0095.00*
0096.03*	0096.07*	0096.08*	0096.09*	0097.02*	0100.03	0129.00*	0130.05*	0130.08*	0130.09*	0130.12*
0130.13*	0131.01*	0131.02*	0131.04*	0132.01*	0133.00*	0134.00*	0135.00*	0136.05*	0136.07*	0136.08*
0136.10*	0136.11*	0136.17*	0136.18*	0136.19*	0136.22*	0137.21*	0138.08*	0140.02	0141.19	0141.20
0141.23*	0141.24*	0141.26*	0141.28*	0141.34*	0141.35*	0141.38*	0141.43*	0141.49*	0141.50*	0141.51*
0141.55*	0141.56*	0141.59*	0142.05	0142.07*	0142.09*	0143.14*	0164.09*	0164.12*	0164.14*	0164.15*
0165.13*	0165.24*	0165.25*	0166.17*	0166.31*	0173.07*	0181.40*	0181.43*	0181.44*	0181.45*	0181.46*
0181.47*	0181.49*	0181.53*	0181.55*	0181.58*	0181.59*	0190.36*	0190.50*	0190.51*	0192.03*	0192.05*
0192.10*	0193.01*	0193.02*	0194.00	0195.01*	0195.02*	0196.00*	0197.00*	0198.00*	0200.00*	0204.02*
0206.00*										
Median Family Income Not Known										
0003.00	0005.01*	0006.11*	0009.02*	0016.01*	0018.01*	0079.15*	0100.02*	0141.42*	9800.00*	9801.00

2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

\* denotes no loans made in specified tracts

Institution: North Dallas Bank & Trust Co.

PAGE: 5 OF 6

Respondent ID: 0000018355

Agency: FDIC - 3

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OUTSIDE ASSESSMENT AREA

HONOLULU COUNTY (003), HI

MSA: 46520

Median Family Income 100-110%

0040.00

OKLAHOMA COUNTY (109), OK

MSA: 36420

Median Family Income 30-40%

1100.00

DENTON COUNTY (121), TX

MSA: 19124

Median Family Income >= 120%

0214.15 0215.29 0219.00

FREESTONE COUNTY (161), TX

MSA: NA

Moderate Income

0003.00

MONTAGUE COUNTY (337), TX

MSA: NA

Middle Income

9501.00

MONTGOMERY COUNTY (339), TX

MSA: 26420

Median Family Income 80-90%

6936.00

ROCKWALL COUNTY (397), TX

MSA: 19124

Upper Income



2022 Institution Disclosure Statement - Table 6

Assessment Area(s) by Tract

\* denotes no loans made in specified tracts

Institution: North Dallas Bank & Trust Co.

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0405.13

TARRANT COUNTY (439), TX

MSA: 23104

Median Family Income 60-70%

1132.06

Median Family Income 80-90%

1131.19

Median Family Income >= 120%

1136.11 1136.23 1138.15 1139.54 1139.55 1139.56 1139.58

TRAVIS COUNTY (453), TX

MSA: 12420

Median Family Income >= 120%

0019.12

VAN ZANDT COUNTY (467), TX

MSA: NA

Middle Income

9510.02

Error Status Information

Respondent ID: 0000018355

Institution: North Dallas Bank & Trust Co.

Agency: FDIC - 3

Record Identifier: <sup>11</sup>	Total Composite Records on File	Total Composite Records Without Errors	Total Validity <sup>10</sup> Errors	Percentage of Validity Errors
Transmittal Sheet	1	1	0	0.00%
Small Business Loans	75	75	0	0.00%
Small Farm Loans	1	1	0	0.00%
Community Development Loans	1	1	0	0.00%
Consortium/Third Party Loans (Optional)	1	1	0	0.00%
Assessment Area	2	2	0	0.00%
Total	81	81	0	0.00%

Footnote:

10. A validity edit helps to verify the accuracy of the data reported. An institution's CRA submission that passes all validity edits does not ensure 100% accurate data. True accuracy is determined during the examination process.
11. A record represents one row of data reported to the Federal Reserve Board. This does not in any way represent the number of loans originated or purchased by the institution.

**HMDA Notice**

**NORTH DALLAS BANK & TRUST CO.  
HOME MORTGAGE DISCLOSURE ACT NOTICE**

The HMDA data about our residential mortgage lending are available online for review. The data show geographic distribution of loans and applications; ethnicity, race, sex, age, and income of applicants and borrowers; and information about loan approvals and denials.

These data are available online at the Consumer Financial Protection Bureau's website ([www.consumerfinance.gov/hmda](http://www.consumerfinance.gov/hmda)).

HMDA data for many other financial institutions are also available at this Web site.