



COMMUNITY REINVESTMENT ACT (CRA)

Public File

July 1, 2025

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WRITTEN COMMENTS

WRITTEN COMMENTS

No Comments or complaints concerning CRA to date.

CRA EXAM



Office of the Comptroller of the Currency

Dallas/Fort Worth Field Office
225 E. John Carpenter Frwy., Suite 900
Irving, TX 75062
(972) 277-9500 (Office)

June 12, 2025

Board of Directors
First Command Bank
1 Firstcomm Plaza
Fort Worth, TX 76109

Members of the board:

We have completed a review of your compliance with the Community Reinvestment Act (CRA). Your bank has met the intent of the CRA, and we assigned an overall “Satisfactory” rating to your performance.

Included with this letter is the Public Disclosure, which summarizes your performance. A copy of this Performance Evaluation must be placed in the bank’s public file within 30 days of receipt.

Sincerely,

Kimberly K.
Einspahr

Digitally signed by
Kimberly K. Einspahr
Date: 2025.06.12
12:25:25 -05'00'

Kimberly Einspahr
Assistant Deputy Comptroller
Dallas/Fort Worth Office

Enclosure: CRA Performance Evaluation



Office of the
Comptroller of the Currency
Washington, DC 20219

INTERMEDIATE SMALL BANK

PUBLIC DISCLOSURE

May 19, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First Command Bank
Charter Number: 713570

1 Firstcomm Plaza
Fort Worth, Texas 76109-4999

Office of the Comptroller of the Currency

225 E. John Carpenter Freeway, Suite 900
Irving, Texas 75062

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

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Overall CRA Rating

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

The Lending Test is rated: Satisfactory.

The Community Development (CD) test is rated: Satisfactory.

The Lending Test is based on performance in the United States (U.S.) assessment area (or "U.S. AA"), which is the bank's AA. The CD Test rating is based on performance in the U.S. AA. The major factors that support this rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the performance context.
- A substantial majority of the bank's loans are inside its AA.
- The geographic distribution of loans across geographies of different income levels is reasonable.
- The borrower distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- CD activities reflect adequate responsiveness in meeting the community and credit needs of its AA through qualified loans, investments, donations, and services.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's LTD ratio is reasonable. The LTD ratio is calculated on a bank-wide basis. First Command Bank's (FCB or bank) quarterly LTD ratio is 43.2 percent, with a quarterly high of 49.9 percent as of September 30, 2024, and a quarterly low of 36.4 percent as of March 31, 2022. The bank's LTD ratio exhibited an overall upward trend over the evaluation period and the average LTD ratio slightly improved from the previous CRA evaluation wherein the average LTD ratio was 41.8 percent. We also compared the bank's LTD ratio to three other institutions serving substantial military populations with similar geographical reach. The quarterly average LTD ratio for banks in this peer group was 52.5 percent, with a high ratio of 68.9 percent and a low ratio of 39.1 percent.

The bank is predominately a consumer lender with 58.5 percent of its loan portfolio centered in consumer-related loans as of December 31, 2024. The primary consumer loan product is debt consolidation loans which made up 61.2 percent of all consumer loans originated by count during the evaluation period. These loans are typically small to moderate in size. When aggregated and compared against the bank's deposits, this may yield a modest LTD in comparison to the other military focused banks with more substantial commercial loan portfolios and smaller levels of loans to individuals. During the evaluation period, the bank originated 5,734 loans with origination balances of \$25,000 or less. Additionally, most loans are short-term, and borrowers are encouraged to repay principal at a pace even faster than the contractual terms as the borrower's financial position improves. As a result, even as new loans are being originated, existing loans are being repaid and at a similar rate.

Lending in Assessment Area

A substantial majority of the bank's loans were made inside its AA. Specifically, the bank originated and purchased 100 percent of its total loans inside the AA during the evaluation period. This analysis was performed at the bank level, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. FCB has designated the entire deposit base as its AA, and the majority of the bank's customers are active or former active-duty military. As such, the customer base is broadly located across the United States and overseas.

Table 1: Lending Inside and Outside of the Assessment Area										2022-2024
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	30	100.0	0.0	0.0	30	6,122	100.0	0.0	0.0	6,122
Consumer	30	100.0	0.0	0.0	30	681	100.0	0.0	0.0	681
Total	60	100.0	0.0	0.0	60	6,803	100.0	0.0	0.0	6,803
Source: 1/1/2022 - 12/31/2024 Bank Data.										
Due to rounding, totals may not equal 100.0%										

Description of Institution

FCB is a federally chartered, one-branch bank headquartered in Fort Worth, Texas. FCB was established in 1997 and is a wholly-owned subsidiary of First Command Financial Services (FCFS). FCFS is also headquartered in Fort Worth and owns and operates the bank and three other affiliated organizations that provide a range of financial planning, asset management, life insurance, and investment advisory services to active and retired military personnel. FCFS provides these services through a nationwide network of financial advisors who operate primarily near military base installations all over the United States and several international locations where U.S. military forces are deployed. Financial advisors are trained to routinely refer their clients to FCB for their traditional credit, depository, and wealth management needs. As a result, the customer base is primarily comprised of FCFSs existing client base with the strategic focus of meeting the banking needs of these clients.

The bank operates one full-service facility in Fort Worth, that includes one cash-only automated teller machine (ATM) and another ATM that accepts deposits at this location. Also, the bank has five non-deposit taking ATMs: three located at Coast Guard Exchange stores in San Diego, California, Milwaukee, Wisconsin, and Elizabeth City, North Carolina; and two ATMs located at FCFS district offices in El Paso, Texas and Leesville, Louisiana. Given the nationwide dispersion of the bank's military customer base, foot traffic at the bank's sole physical location is limited with most customers completing their transactions through electronic and remote platforms. As such, the bank offers a wide variety of banking services to ensure that customers have instantaneous accessibility to their depository accounts regardless of where they are located. FCB offers nationwide and international access to ATMs through its numerous ATM networks in which it participates. Customers may also access their account information at any time through the bank's online banking system, mobile banking application, and toll-free customer support telephone system which operates extended hours. FCB's website provides information regarding the bank's products and services and allows online access to account information

to customers enrolled for that service. The bank also accepts new loan and deposit account applications as well as customer service requests through its website.

FCB reported total assets of approximately \$1.1 billion, total deposits of \$964.3 million, and tier 1 capital of \$91 million at the end of our evaluation period December 31, 2024. Total loans and leases of \$470.3 million represented 44.2 percent of total assets. Major loan categories include consumer loans at 58.5 percent of total loans, commercial and industrial loans at 24.1 percent, commercial real estate loans at 16.4 percent, and construction loans at one percent. Investment securities totaled \$433 million. Debt consolidation loans continue to represent the largest component of the bank's consumer lending product offerings. This product is a significant strategic focus, which aids its target customer base in achieving holistic, long-term financial security. The typical user of this product are military personnel working with a FCFS financial planner to get their finances better organized as part of preparation for a military career. Those individuals planning a long-term career with the military will be held to a high standard of financial discipline and ill-managed finances may negatively impact their performance rating. As such, the FCFS financial planner may suggest a lower rate debt consolidation loan originated by FCB to pay off the credit card debt if a client has significant credit card debt. Money that previously went to credit card interest is then deployed to savings, investments, or life insurance, depending on the customer's situation. As a result, the customer's monthly payments stay the same, but they are reducing debt and building savings due to lower interest rates and sometimes a shorter repayment term.

FCB also pursues commercial lending opportunities through Small Business Administration (SBA) products and in-house specialized products for practice acquisition loans primarily to dentists and veterinarians. While these loans are available to both civilians and military personnel, the bank envisions that these loans are targeted to meet the needs of retiring professional military personnel whom, with FCFS financial planning assistance, have been able to save enough resources to purchase their own professional practices. Furthermore, the bank introduced SBA 7(a) and Express loan products for small business owners in 2022. These products aim to provide opportunities for customers to acquire capital for start-up businesses, expansions, franchise financing, business acquisitions, and other working capital needs.

There are no legal, financial, or other factors impeding FCB's ability to help meet the credit needs in the AA. FCB received an overall rating of "Satisfactory" at the last CRA evaluation dated May 23, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a full-scope review of FCB's CRA activities in the AA under the Intermediate Small Bank CRA procedures, which includes the Lending Test and the CD Test. The Lending Test evaluates the bank's record of meeting the credit needs of the AA through its lending activities. The CD Test evaluates the bank's responsiveness to CD needs in its AA through qualified CD lending, investments and donations, and services.

Loan information used for this evaluation included consumer and small loans to businesses for loans originated between January 1, 2022 and December 31, 2024. Conclusions regarding the CD Test are based on the bank's CD activities during the same period.

Selection of Areas for Full-Scope Review

The bank was evaluated under the provision of 12 CFR 25.41(f), which allows institutions serving the needs of military personnel and their dependents to define its AA as its entire deposit customer base. FCB identifies as a military bank with a primary focus of serving military personnel and their dependents. As such, our review of the bank's CRA performance involves the entirety of the United States. Refer to Appendix A for more information.

Ratings

The bank's overall rating is based on FCB's performance within its entire deposit customer base located throughout the United States.

Our analysis placed more weight on consumer loans because they represent the majority of the bank's loan portfolio by count and dollar volume. Also, consumer loans are a significant credit need for the bank's client base. Further, we placed more weight on the bank's lending distribution by borrower income level than geographic distribution. FCS operates primarily close to where military bases are located and areas from where its financial advisors operate, and their market reach is significantly determined by military base locations nationwide.

Discriminatory or Other Illegal Credit Practices Review

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

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

United States

CRA rating for the United States¹: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- FCBs LTD ratio is reasonable when considering performance context.
- A substantial majority of FCBs lending activity is within the AA.
- The geographic distribution of loans across geographies of different income levels is reasonable.
- The borrower distribution of loans to borrowers of different income levels and businesses of different sizes is reasonable.
- CD activities reflect adequate responsiveness to community credit and development needs.

Description of Institution's Operations in the United States

The bank's only physical branch is located in Fort Worth, Tarrant County, Texas. However, the bank operates nationwide and primarily serves active and retired military personnel and their dependents as described in the "Description of Institution" and the "Scope of the Evaluation" sections of this Performance Evaluation. As such, FCBs AA is the entire United States as afforded under 12 CFR 25.41(f).

FCB continues to pursue a lending strategy that is heavily focused on consumer lending, specifically debt consolidation loans to military personnel. There is also a significant focus on commercial lending involving practice acquisition loans for dentists and veterinarians, primarily for trained professionals transitioning out of military service. Overall community credit needs in the AA impacting service members were determined by reviewing recent demographic information, performance context information provided by management, and community contacts conducted in conjunction with performance evaluations from other banks operating in the AA or serving a similar customer base.

According to the U.S. Census Bureau from the 2020 census, the U.S. population was approximately 331.4 million. From the 2010 US Census to the 2020 Census, the U.S. population grew at 7.4 percent. The greatest population growth occurred in the South at 10.2 percent and in the West at 9.2 percent. The Northeast and Midwest grew at 4.1 percent and 3.1 percent, respectively. With respect to the U.S. service member population, there were approximately 2.5 million military personnel and 878,268 Department of Defense (DOD) civilians as of September 30, 2023 according to the most recent figures published by DOD's Military OneSource public website. The DOD military force includes Army Active Duty (449,344), Army National Guard (325,066), Army Reserve (176,680), Navy Active Duty

¹ This rating reflects performance within the United States, the bank's designated AA.

(327,934), Navy Reserve (55,072), Marine Corps Active Duty (172,577), Marine Corps Reserve (33,036), Air Force Active Duty (314,648), Air National Guard (104,974), Air Force Reserve (66,216), and Space Force Active Duty (8,879). The top three states where active-duty members are assigned are California, Virginia, and Texas. The Coast Guard, organized under the Department of Homeland Security in 2023, has a force of 38,825.

Similar to the general population, military members continue to experience increased costs for housing. These challenges were highlighted in the U.S. Government Accountability Office report released on October 30, 2024 entitled “Military Housing: DOD Should Address Critical Supply and Affordability Challenges for Service Members”. This report noted 51 percent of surveyed respondents indicated that there is an insufficient supply of housing for military members seeking housing, and 67 percent noted that “housing is somewhat or very unaffordable” for service members. The report identified that approximately two-thirds of service members in the country live off base in local communities, and housing supply and affordability remain a challenge. Per the U.S. Department of Housing and Urban Development, the median sales price of houses sold in the United States was \$416,900 at the end of the evaluation period. This represents a notable increase in recent years as the median sold home price was \$317,100 (April 1, 2020) around the onset of the COVID-19 pandemic.

Competition for financial services to military personnel is strong and includes credit unions on military installations, payday lenders, specialized consumer lenders, and organizations with military affiliations. Examples of significant military focused financial institutions within the AA include USAA Federal Savings Bank, Navy Federal Credit Union, PenFed Credit Union, Service Credit Union, and JPMorgan Chase Bank, N.A. (Chase Military Banking Division).

Community Contacts

We reviewed a community contact from an organization that provides services, programs, and opportunities to improve the lives of veterans as well as two community contacts involving CD organizations serving geographical areas with significant military populations (San Diego, California and San Antonio, Texas markets). A community contact noted that affordable housing suitable for families remain a primary need for U.S. military populations. As highlighted in a 2023 Military Family Support Programming Survey performed by Oracle Health, military families reported that the rising cost of living and inflation with a particular focus on living in high cost-of-living areas, rising housing costs, and increased food costs have been a significant barrier to their ability to save and placed significant financial burdens on military families. Of note, one in five military survey respondents stated that they have experienced food insecurity. With respect to other CD needs, community contacts indicated that there is significant demand for start-up business capital/funding in the reviewed markets. According to one contact, banks have had trouble lending to new businesses due to lack of credit history and/or limited business plans and inconsistent income streams. As such, small business training/entrepreneurial training remains an important CD need and opportunities for financial institutions to partner with organizations that provide entrepreneurship training to servicemembers transitioning out of service remain available within many markets in the nationwide AA.

The following table provides a summary of the demographics, including housing, business, and economic information for the United States.

Assessment Area- Nationwide AA						
2022-2024						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	84,415	6.50	22.34	41.55	26.91	2.70
Population by Geography	331,449,281	5.67	21.69	42.29	29.28	1.07
Housing Units by Geography	138,432,751	5.64	21.74	43.43	28.31	0.89
Owner-Occupied Housing by Geography	78,801,376	2.56	17.20	46.14	33.69	0.41
Occupied Rental Units by Geography	43,552,843	10.88	29.64	37.88	20.01	1.58
Vacant Units by Geography	16,078,532	6.52	22.59	45.17	24.40	1.32
Businesses by Geography	15,391,792	4.68	19.44	38.95	35.42	1.52
Farms by Geography	614,431	2.32	15.54	52.10	29.47	0.57
Family Distribution by Income Level	79,849,830	21.52	17.45	20.17	40.85	0.00
Household Distribution by Income Level	122,354,219	24.30	16.02	17.69	41.99	0.00
Unemployment rate (%)	5.35	10.01	6.91	4.92	3.98	8.18
Households Below Poverty Level (%)	12.51	31.63	18.31	10.78	6.61	29.59
Median Family Income (Nationwide AA)		\$73,440	Median Housing Value			\$201,800
Median Family Income (Nationwide AA) for 2024		\$89,500	Median Gross Rent			\$1,011
			Families Below Poverty Level			9.07
FFIEC File - 2024 Census						
2024 Dun & Bradstreet SBSF Demographics						
Due to rounding, totals may not equal 100.0%						
(*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in the United States

We completed a full-scope review of the bank's only AA, the U.S. AA. FCB identifies as a military bank with a primary focus of serving current and former military personnel. As stated throughout this evaluation, FCB was evaluated under the provisions of 12 CFR 25.41(f), which allows institutions serving the needs of primarily military personnel and their dependents to define the AA as the entire deposit customer base. FCB's customer base includes mainly military members located throughout the United States. Our evaluation period for the lending test and community development test is January 1, 2022, through December 31, 2024.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE UNITED STATES

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the United States is reasonable.

Distribution of Loans by Income Level of the Geography

FCB exhibits reasonable geographic distribution of loans in the AA. As noted in the “Scope of the Evaluation” section, FCB operates in close proximity to military bases. As such, financial advisors operate near bases and the bank’s market reach is significantly determined by military base locations nationwide.

Small Loans to Businesses

Refer to Table 9 in appendix D for the facts and data used to evaluate the geographic distribution of the bank’s originations and purchases of small loans to businesses.

FCBs small loans to businesses in low-income geographies (3.3 percent) was somewhat below the percentage of businesses within these geographies and the aggregate lending performance. We acknowledged that opportunities were likely limited as only 4.7 percent of businesses were in these geographies. In moderate-income geographies, the percentage of small business lending was near to the percentage of businesses in those geographies as well as the aggregate lending performance.

We took into consideration FCBs commercial lending strategy that focuses on practice acquisition loans, specifically, dental and veterinary practices. These businesses tend to be located in strip centers and office complexes within highly commercialized areas and opportunities to rent or buy office space within low- and moderate-income (LMI) tracts tend to be fewer.

Consumer Loans

Refer to Table 13 in appendix D for the facts and data used to evaluate the geographic distribution of the bank’s consumer loan originations and purchases.

The percentage of consumer loans to borrowers located in low-income geographies (3.3 percent) was lower than the percentage of households that reside in these areas. However, we acknowledge that opportunities were likely limited as only 5.5 percent of households reside in these geographies. Conversely, the bank’s lending performance within moderate-income geographies exceeded the demographic benchmark.

Lending Gap Analysis

We evaluated the lending distribution in the bank’s AA to determine if any unexplained conspicuous gaps existed. There were no unexplained conspicuous gaps identified after reviewing the performance context.

Distribution of Loans by Income Level of the Borrower

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

Small Loans to Businesses

Refer to Table 10 in appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The percentage of the bank's small loans to businesses with revenues less than or equal to \$1 million was somewhat below the percentage of businesses identified as having revenue less than or equal to \$1 million but approximated the aggregate lending to these businesses. Moreover, we observed an improved performance from the previous CRA evaluation with some financing of new and fledgling businesses.

Consumer Loans

Refer to Table 14 in appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The percentage of consumer loans to low-income individuals was somewhat below the percentage of low-income households in the AA. However, the bank's consumer lending to moderate-income individuals exceeded the percentage of moderate-income households in the AA.

The bank's primary loan product remains their debt consolidation loan, which is typically targeted for enlisted non-commissioned officer (NCO) levels of E-5 and above. This population is represented by servicemembers who have spent several years within the military, are likely to pursue a military career, and are beginning to have some financial wherewithal to start saving and investing. Typically, these servicemembers would have at least five years of service, before attaining the E-5 grade. According to the military pay tables completed as of January 1, 2024, by the Defense Finance and Accounting Service, the average annual salary for an E-5 NCO ranged from \$34,466 to \$48,917 in 2024 depending on their length of service in the military. Based on the median family income totals for the nationwide AA referenced in the "Description of Institution's Operations in the United States", this salary range falls primarily within the moderate-income category. As the majority of FCBs customer base originates from referrals from FCFS, NCOs and newly commissioned officers account for most of the bank's deposit base and are most likely to take advantage of the debt consolidation loan product.

Responses to Complaints

FCB had no CRA-related complaints during the evaluation period.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the United States is rated Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited adequate responsiveness to CD needs in the AA through CD loans, qualified investments, and CD services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for CD in the bank's AA.

Number and Amount of Community Development Loans

The CD Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Table 3: Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
U.S. AA	10	100.0	2,265	100.0

The level of CD lending demonstrates adequate responsiveness to the credit and community development needs of the bank's AA relative to performance context considerations. Considering the bank's niche business model and limited in-house expertise with loans that would be qualified for CD , we placed greater emphasis on qualified investments to address the CD needs of the AA.

The bank originated ten loans totaling approximately \$2.3 million during the evaluation period. This represents 2.5 percent of Tier 1 Capital as of December 31, 2024. Specifically, FCB originated a \$500,000 loan that provides needed community services benefiting LMI senior citizen veterans in Bonham, Texas. This loan has a 12-month term and renewed annually during the review period. Moreover, the bank originated seven loans totaling \$765,000 that revitalized and stabilized federal designated disaster areas in Florida and Georgia impacted by Hurricane Helene.

Number and Amount of Qualified Investments

Table 4: Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
U.S. AA	0	0	38	7,809	38	100.0	7,809	100	0	0

FCBs level of investments demonstrates adequate responsiveness to the CD needs in the AA. Donations and investments totaled \$7.8 million during the review period. This represents 8.6 percent of total Tier 1 capital as of December 31, 2024. Most notably, the bank purchased two mortgage-backed securities totaling \$6 million in a CRA Qualified Fund in 2022. The bank and holding company also made \$1.7 million in donations to the First Command Education Foundation (FCEF) during the evaluation period. FCEF was formed in 1983 to provide educational scholarships to military dependents. FCEF administers multiple scholarship programs and endowments that are heavily based on financial need. In recent years, FCEF expanded to include financial education for military personnel as well as the civilian population. Further, FCB made three donations totaling \$15,000 to an organization that provides community services primarily benefiting LMI veteran senior citizens.

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

Extent to Which the Bank Provides Community Development Services

FCBs level of CD services demonstrates adequate responsiveness to the needs of the AA, when factoring in the performance context. Thirty-three employees devoted 587 CD service hours to 18 different qualifying organizations in the AA during the evaluation period. These services include developing and conducting financial education programs to individuals and providing technical financial assistance to CD organizations. Bank and holding company staff serve in leadership roles such as directors and executive committee members whose mission is to provide assistance, education, and skills to LMI individuals. Specific examples of qualifying CD service activities include:

- A bank officer provided 68 cumulative hours of board service and financial technical expertise to a nonprofit organization that provides community services primarily benefiting LMI individuals in Tarrant County, Texas.
- A bank officer provided 20 hours of technical expertise to an organization that offers entrepreneurial and small business development training to service members and military spouses.

We also acknowledged that FCBs banking programs allow the bank to deliver needed banking and credit services to LMI areas and individuals as well as small businesses owners in the AA, and include, but are not limited to:

- SBA Express Line of Credit and SBA 7(a) loans. FCB partners with organizations such as SBAs Veteran's Business Outreach Center and Small Business Development Center to assist veterans with financial assistance to start a small business.
- First Checking Account with no minimum opening deposit, no minimum balance requirements, no monthly service fees, free online banking and web bill pay, free eStatements, free unlimited telephone banking, and free initial/renewal MasterCard debit card with unlimited free debit card transactions. This account is designed to encourage early-career service members to develop good savings and spending habits.
- Command Checking Account with no minimum opening deposit, no monthly service fees, free unlimited check writing, free initial/renewal MasterCard debit card with unlimited free debit card transactions, free online banking and web bill pay, free overdraft from another FCB account, free eStatements, and free unlimited telephone banking.
- Commercial Checking Account that has a low minimum opening deposit, no monthly service charge when average daily balance of \$1,500 is maintained, or a low monthly service charge of \$10 if average daily balance of \$1,500 is not maintained, free unlimited deposits, free initial/renewal MasterCard debit card with unlimited free debit card transactions, free overdraft from another FCB account, free online banking, free remote deposit and web bill pay, free eStatements, and free unlimited telephone banking.
- Third party ATM surcharge fee rebates up to \$10 per statement cycle, per account.
- Free remote deposit functionality for consumer and business accounts.

- Client assistance during government shutdowns including: zero interest payroll advances, loan assistance, penalty free early CD withdrawals, secured lines of credit, and special handling of credit card accounts.
- FCBs Natural Disaster Assistance Program includes lower rate single pay loans, loan assistance, penalty free early CD withdrawals, and special handling of credit card accounts.

Appendix A: Scope of Examination

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

Time Period Reviewed:	01/01/2022 to 12/31/2024	
Bank Products Reviewed:	Small business and consumer loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
First Command Financial Services	Holding Company	Qualified Investments, community development services
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
U.S. AA	Full-scope	This represents the bank’s entire customer base

Appendix B: Summary of MMSA and State Ratings

RATINGS FIRST COMMAND BANK			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
First Command Bank	Satisfactory	Satisfactory	Satisfactory
Assessment Area:			
U.S. AA	Satisfactory	Satisfactory	Satisfactory

(*) The Lending Test and Community Development Test carry equal weight in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Multistate Metropolitan Statistical Area (MMSA): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

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

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.
- Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

Table 9: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2024
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
U.S. AA	30	6,122,000	100.0	8,354,516	4.68	3.33	4.22	19.44	16.67	18.21	38.95	53.33	37.85	35.42	26.67	38.36	1.52	0.00	1.36
Total	30	6,122,000	100.0	8,354,516	4.68	3.33	4.22	19.44	16.67	18.21	38.95	53.33	37.85	35.42	26.67	38.36	1.52	0.00	1.36
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data, "--" data not available.																			
Due to rounding, totals may not equal 100.0%																			

Table 10: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2024
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
U.S. AA	30	6,122,000	100.0	8,354,516	82.95	53.33	54.16	8.32	40.00	8.73	6.67
Total	30	6,122,000	100.0	8,354,516	82.95	53.33	54.16	8.32	40.00	8.73	6.67
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2023 CRA Aggregate Data, "--" data not available.											
Due to rounding, totals may not equal 100.0%											

Table 13: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022-2024
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
U.S. AA	30	681,354	100.0	5.52	3.33	21.63	23.33	43.20	40.00	28.82	33.33	0.83	0.00
Total	30	681,354	100.0	5.52	3.33	21.63	23.33	43.20	40.00	28.82	33.33	0.83	0.00
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data.													
Due to rounding, totals may not equal 100.0%													

Table 14: Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022-2024
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total Number	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
U.S. AA	30	681,354	100.0	24.30	16.67	16.02	16.67	17.69	33.33	41.99	33.33	0.00	0.00
Total	30	681,354	100.0	24.30	16.67	16.02	16.67	17.69	33.33	41.99	33.33	0.00	0.00
Source: FFIEC File - 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "---" data not available.													
Due to rounding, totals may not equal 100.0%													

BANK BRANCH AND LOCATION

Bank Location

4100 South Hulen Fort Worth, TX 76109

MSA: 23104 | Census Tract: 1054.05 | County: Tarrant | State: 48

First Command Bank's defined CRA assessment area is its entire deposit customer base, which is the entire U.S.

Branch Location:

4100 South Hulen

Fort Worth, TX 76109

Branches Opened or Closed:

Current Year 2025: None

Prior Years 2023 and 2024: None



RETAIL BANKING SERVICES

Retail Banking Services

Hours of Operation:

Branch Hours: 9 am – 3 pm CST (Monday-Friday excluding Federal Holidays)

Personal Bankers Hours: 7 am – 12 am CST (Monday-Friday); 9 am – 3 pm CST (Saturday) (excluding Federal Holidays)

Products Offered:

Checking Accounts

- First Checking Account
- Command Checking Account

Savings Accounts

- Money Market Savings Account
- First Savings Account
- Traditional IRA and ROTH IRA Money Market Savings Accounts
- First Command Certificate of Deposit Accounts
- Traditional IRA and ROTH IRA Certificate of Deposit Accounts

Business Accounts

- Command Business Checking Account
- Business Premier Money Market Account

Personal Loans

- Auto Loans
- Debt Consolidation Loans
- Unsecured Personal Loans
- Secured Personal Loans

Commercial Loans

- Real Estate Loans
- Secured Loans
- Unsecured Loans
- Acquisition/Practice Loans
- Construction Loans
- Accounts Receivable & Inventory Loans
- Leasehold Improvement Loans

SBA Loans

- Veteran Loans
- Express Loans
- 7A Loans
- 7A Small Loans



Credit Cards

- First Classic VISA® Credit Card
- VISA® Signature Points Credit Card
- VISA® Signature Cashback Credit Card
- Visa® Signature Premier

Wealth Management and Trust Services

- Trust Accounts
- Investment management Accounts

Services Offered:

Mortgage Broker

- Purchase
- Re-Finance
- Home Improvement
- Home Equity

Services

- OnCommand™ Online Banking
- 24 Hour Automated Phone Banking
- MobileCommand Mobile Banking
- EStatements
- ATM
 1. Surcharge Rebate Program
 2. Debit Card Cash Withdrawal
 3. Debit Card Cash Advance
 4. Debit Card Signature Based Purchase
 5. Debit Card PIN Based Purchase
- Debit Card Replacement
- Overdraft Services
- Electronic Payment Services
 1. ACH
 2. Zelle
 3. Bill Pay
 4. Wire Transfers
- Other
 1. Gift Cards
 2. Cashier's Checks
- Safe Deposit Box
- Checks
 1. Personal Checks
 2. Standard Checks
 3. Custom Checks

Quick Overview of SBA Loan Guaranty Programs – FY25

Program	Maximum Loan Amount	Percent of Guaranty	Eligible Use of Proceeds	Maturity	Maximum Interest Rates	Guaranty Fees (Based on Gtd. Portion)	Who Qualifies	Benefits to Borrowers
7(a) Loans	\$5 million	85% guaranty for loans of \$150,000 or less; 75% guaranty for loans greater than \$150,000 (up to \$3.75M maximum guaranty)	Term Loan. Expansion/renovation; new construction, purchase land or buildings; purchase equipment, fixtures, leasehold improvements; working capital; refinance debt for compelling reasons; for inventory or starting or purchasing a business. Only owner-occupied commercial real estate is eligible.	Depends on ability to repay. Generally, working capital not to exceed 10 years; Equipment, fixtures, or furniture not to exceed 10 years. Except term may be up to 15 years if IRS asset class useful life supports longer term. Lender must document in credit memo justification of any term that exceeds 10 years; real estate up to 25 years. No balloons or demand features permitted.	Effective Aug. 1, 2022 \$50,000 or less Prime + 6.5% \$50,001 - \$250,000 P + 6% \$250,001 – \$350,000 P + 4.5% \$350,001 and greater P + 3% Fixed Rate: https://catran.sba.gov/ftadistapps/ftawiki/index.cfm . See Downloads and Resources section.	<u>Charged on guaranteed portion Guaranty Fee:</u> \$1,000,000 or less= 0%; \$1,000,001 to \$5,000,000= 3.5% up to \$1 million plus 3.75% of gtd. portion over \$1 million. Loans 12 months or less of \$1 million or less = 0%; over \$1 million = 0.25% <u>Ongoing lender fee:</u> \$500,000 and less = 0.00% - \$500,001 to \$1,000,000 = 0.17% - \$1,000,001 to \$5,000,000=0.55%	Must be a for-profit business & meet SBA size standards; show good character, credit, management, and ability to repay. Must be an eligible type of business. Prepayment penalty for loans with maturities of 15 years or more if prepaid during first 3 years. (5% year 1, 3% year 2 and 1% year 3)	Long-term financing; Improved cash flow; Fixed maturity; No balloons; No prepayment penalty (under 15 years)
7(a) Small Loans Is any 7(a) loan \$500,000 and under, except the Community Advantage and Express loans.	\$500,000	Same as 7(a) Loans	Same as 7(a) Loans	Same as 7(a) Loans	Same as 7(a) Loans	Same as 7(a) Loans	Same as 7(a) Plus, all loan applications will be credit scored by SBA. If not an acceptable score, the loan can be submitted via full standard 7(a) or Express.	Same as 7(a) Loans
SBA Express	\$500,000	50% regardless of loan amount.	May be used for revolving lines of credit (<u>must have term-out period not less than draw period</u>) or for a term loan.	LOC: Max period Revolver = 60 mo.; Max term out period = 60 mo. For total of 10 yrs. Term loan: same as 7(a)	Same as 7(a) Loans	Same as 7(a) Loans	Same as 7(a) Loans	Fast turnaround; Streamlined process; Easy-to-use line of credit
SBA Loans to Veterans	Processed under SBA Express so same as above limit of \$500,000	Same as SBA Express	Same as SBA Express	Same as SBA Express	Same as 7(a) Loans	For all SBA Express loans made to veteran-owned small businesses, upfront guaranty fee will be zero. Lenders must document in loan file with veteran eligibility using the documentation to Notice 5000-818641 .	Same as 7(a) plus, small business must be owned and controlled (51%+) by one or more of the following groups: veteran, active-duty military in TAP, reservist or National Guard member or a spouse of any of these groups, or a widowed spouse of a service member or veteran who died during service, or a service-connected disability.	Same as SBA Express and no upfront guaranty fee.

SCHEDULE OF FEES AND CHARGES

SCHEDULE OF FEES AND CHARGES



Contact us toll-free at 1.888.763.7600 or online at www.firstcommand.com.

ACCOUNT OPENING AND USAGE

Minimum Deposit To Open Account

Command Checking.....	\$0
First Checking.....	\$0
First Savings	\$0
Money Market	\$0
Business Checking	\$25
Business Premier Money Market	\$25
Certificate of Deposit (CD)	\$0

Individual Retirement Accounts (IRA)

Money Market IRA.....	\$0
CD IRA	\$1,000

Monthly Service Fee

Command Checking.....	\$0
First Checking.....	\$0
First Savings	\$0
Money Market	\$0
Business Checking	\$10
<i>To avoid the \$10.00 monthly service fee, the Business account must maintain a minimum daily balance of \$1,500.00.</i>	
Business Premier Money Market	\$0

AUTOMATED TELLER MACHINE (ATM)/DEBIT CARD FEES & LIMITS

ATM Fees

ATM Surcharge RebateUp to \$10 per statement cycle

Use of non-First Command Bank ATMs may be subject to a surcharge fee by the ATM owner.

First Command may refund up to \$10 in other banks' ATM surcharge fees for transactions using their ATMs.

Replace Lost/Damaged Debit Card \$0



Use your ATM/Debit Card at any of the ATMs listed on this site, www.moneypass.com/atm-locator without paying a surcharge. You can also use the convenient ATM locator found on the login screen of MobileCommand banking app.

ATM/Debit Card Transaction Limits (per card, per calendar day)

ATM Cash Withdrawal.....	\$1,000
Debit Card Cash Advance.....	\$3,500
Debit Card Signature Based Purchase	\$3,500
Debit Card PIN Based Purchase.....	\$3,500

Account features and pricing are subject to change. (4/2025)

482-E (4/25) Supersedes 1482-E (12/24) which should be destroyed. Effective date 04/10/25

©2025 First Command Bank. Investment and insurance products are not deposits, are not insured by the FDIC, and may lose value. 04105

RETURNED ITEM FEE (NON-SUFFICIENT FUNDS)

Returned Item Fee	\$29
<i>Applies to check, withdrawals, and transfers from your account that First Command Bank (FCB) either returns or in its sole discretion, elects to pay due to non-sufficient funds.</i>	
Chargeback Fee	\$5
<i>Each item you deposit (check, electronic deposit, etc.) into an account that is later returned.</i>	

OVERDRAFT SERVICES

You must enroll/opt-in for overdraft services.

Paid Overdraft Fee	\$25
Minimum Debit Card Amount to Trigger a Paid Overdraft Fee	\$5
Coverdraft from Another FCB Checking or Savings Account	\$0
<i>Sufficient funds must be available in the protecting account. Transfers from your savings account are limited to six (6) debit transactions per monthly statement cycle. Transfers over this limit may be subject to additional fees.</i>	

WIRE FEES

Wire Transfer Fee – Incoming	\$0
Wire Transfer Fee – Outgoing (Domestic)	\$20
Wire Transfer Fee – Outgoing (International)	\$45

MONEY MARKET SAVINGS ACCOUNTS

Excessive Money Market Transaction Fee

Money Market Accounts are restricted to six (6) transactions (checks and ACH debits, transfers) per month and any transactions over that amount are subject to an excessive Item Fee.

Each Occurrence	\$10
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CERTIFICATE OF DEPOSIT (CD) EARLY WITHDRAWAL PENALTIES

You will have ten calendar days after maturity to withdraw the funds without a penalty.

CD Term

1 Year or Less	90 days of interest, or all interest on the amount withdrawn, whichever is less
More Than 1 Year and Less Than 3 Years Remaining	180 days of interest, or all interest earned on the amount withdrawn, whichever is less
More Than 3 Years Remaining	365 days of interest, or all interest on the amount withdrawn, whichever is less

OTHER FEES

Paper Statement Fee	\$1 / Account / Month
<i>There will be no charge on CDs, IRA, and personal or business accounts that are used to make payments associated with a First Command financial plan for monthly investment, insurance, or loan payments. If you don't have a First Command financial plan, you can enroll in eStatement delivery by logging into OnCommand or use the MobileCommand app, and visit the Statements and Documents page found in the Accounts menu to avoid the fee.</i>	
Stop Payment Fee	\$0 / Item
Photocopy Fee (e.g. check or deposit slip copy)	\$2 / Item
<i>Free copies are available online if it's within 180 days from the date of the transaction.</i>	
Research Fee	\$15 / Hour
<i>First Command charges a one hour minimum with this fee.</i>	
Bill Pay Service Fee	\$0
<i>Must have an FCB checking account.</i>	

PERSONAL CHECKS

Standard Checks	Varies
Custom Image	Varies

COLLECTION FEES

Each Foreign Item Sent for Collection	Varies
<i>The minimum amount of each foreign item must be at least \$50 U.S. dollars.</i>	

GIFT CARD FEES AND EXPIRATION

Inactivity Fee	\$4.95
<i>Subject to applicable law, beginning the 13th consecutive month from the day of activation, a monthly inactivity fee will be assessed to your Card as long as there are funds remaining and no activity occurs. Such fees may diminish the Card balance before the "value thru" date on the front of the Card. You may avoid this fee by using your Card at least once every twelve months.</i>	
Purchase Fee	\$0 / Card
Lost/Stolen Card Replacement Fee	\$8
<i>Replacement Card at Expiration: There is no additional cost to obtain a replacement Card due to expiration.</i>	

UNAUTHORIZED TRANSACTIONS & LOST OR STOLEN CARDS

Contact FCB immediately via mail, phone, or online to report a lost/stolen ATM/Debit Card, PIN Information, or if you believe there has been unauthorized activity on your bank account.

MAIL

First Command Bank
P.O. Box 90101
Fort Worth, TX 76101-2041

ONLINE

www.firstcommand.com

PHONE

1.888.763.7600
We accept operator relay calls. If you have a hearing or speech disability, call 711 for assistance.

WEALTH MANAGEMENT, EXECUTOR & TRUSTEE FEE SCHEDULE

First Command Bank, as discretionary trustee, co-trustee, agent, or investment manager, assumes responsibility for all facets of your account: custody, administration, accounting, income tax reporting, distributions and discretionary or non-discretionary professional investment management.

The fees payable by you for our services are the annual Management Fee and additional fees for special services you may request, without reduction for any other fees or other compensation paid to us or an affiliated entity, including, but not limited to, fees or other compensation paid by any mutual fund, unit investment trust or other investment vehicle. You agree that the annual Management Fee will be payable quarterly, first from the liquidation by us of shares of any money market funds to the extent that such assets are available, then by liquidation or partial liquidation by us of any investment held in your account.

The investment assets included in the portfolio are purchased with no sales charges. Institutional class shares offered by a fund selected for the portfolio will be used whenever available. Some non-institutional class shares carry a 12b-1 fee. Any 12b-1 fees paid to us for assets held in your account will not be retained by us, and instead will be credited to your account.

Annual Management Fee

The annual Management Fee is calculated on the average daily balance of the account assets and is charged in quarterly increments at the end of each calendar quarter as follows:

- 1.30% of the first \$500,000 of value
- 1.00% of the next \$500,000 of value
- 0.80% of the next \$1,000,000 of value
- 0.65% of the next \$1,000,000 of value
- 0.50% of assets over \$3,000,000

The fair market value, as evidenced by the most recent appraised value of the property, of non-income-producing real estate assets held by your account is included in the calculation of management fees charged by Wealth Management & Trust Services according to the above-referenced rates.

A prorated fee will be assessed to closing accounts based on the market value of the account at the time of closure.

Executor Fee

First Command Bank, as Executor, or Agent for the Executor, of an estate will take on or assist in the gathering of all assets in an individual's estate in addition to the services described above. During the administration of the estate, an additional 1% of the market value of the account assets will be charged to the account, in addition to the Annual Management Fee described above. Executor fees are subject to applicable state laws.

Additional Information

There are no current fees charged when you name First Command Bank to serve at some time in the future as trustee or successor trustee. Fees will be charged only when First Command Bank formally accepts the appointment to serve as trustee.

Some mutual fund companies have revenue sharing arrangements with us or our affiliate, First Command Financial Planning, Inc. or First Command Advisory Services, Inc. Payment under these arrangements are described in the prospectus for each mutual fund and/or provided to you. Any such payments to us or our affiliate do not affect or reduce the Management Fee you pay to us.

Additional fees may be assessed if you request us to perform special or unusual services. Fees assessed by third parties facilitating individual security and ETF trades will be passed through to your account. Short-term trading fees incurred as a result of client-directed transactions will be deducted from your account. Additional fees will be assessed if we are responsible for processing physical securities.

The first fee for your account will be a prorated on a quarterly basis, calculated from the date the account is opened. In the case of a whole or partial distribution, we reserve the right to charge a reasonable fee if significant services are required. Your advisor may be eligible to receive reasonable and customary referral compensation from us. Such compensation is an intercompany transaction and has no effect on the fees stated above. All fees are subject to revision upon thirty (30) days written notice to you.

1 FirstComm Plaza, Fort Worth, TX 76109-4999 • 1.800.443.2104 • www.firstcommand.com

14-30 (3/25) Supersedes 14-30 (1/23) which may be used. 03185

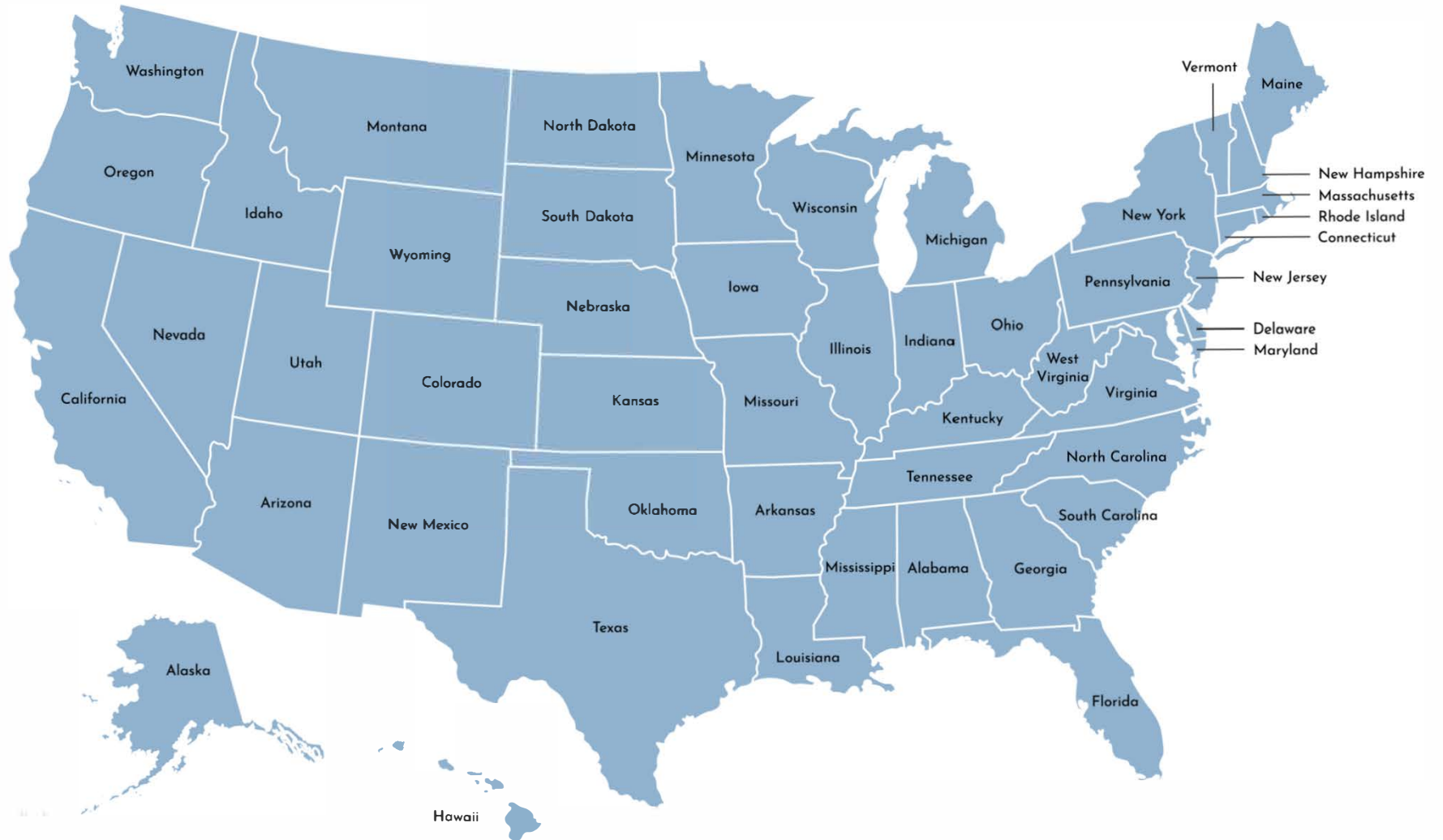
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BANK MAP

Facility-Based Assessment Area

Bank Map

[Census Tract Data](#)



STATE ABBREVIATIONS

Alabama	AL	Nebraska	NE
Alaska	AK	Nevada	NV
Arizona	AZ	New Hampshire	NH
Arkansas	AR	New Jersey	NJ
California	CA	New Mexico	NM
Colorado	CO	New York	NY
Connecticut	CT	North Carolina	NC
Delaware	DE	North Dakota	ND
Florida	FL	Ohio	OH
Georgia	GA	Oklahoma	OK
Hawaii	HI	Oregon	OR
Idaho	ID	Pennsylvania	PA
Illinois	IL	Rhode Island	RI
Indiana	IN	South Carolina	SC
Iowa	IA	South Dakota	SD
Kansas	KS	Tennessee	TN
Kentucky	KY	Texas	TX
Louisiana	LA	Utah	UT
Maine	ME	Vermont	VT
Maryland	MD	Virginia	VA
Massachusetts	MA	Washington	WA
Michigan	MI	West Virginia	WV
Minnesota	MN	Wisconsin	WI
Mississippi	MS	Wyoming	WY
Montana	MT		

LOAN-TO-DEPOSIT RATIO

LOAN-TO-DEPOSIT RATIO AS OF:

December 31, 2024	48.31%
September 30, 2024	49.94%
June 30, 2024	48.12%
March 31, 2024	45.66%