



LARGE BANK

Comptroller of the Currency
Administrator of National Banks
Washington, DC 20219

Public Disclosure

August 23, 2004

**Community Reinvestment Act
Performance Evaluation**

**American Bank, National Association
Charter Number: 15820**

**100 American Bank Plaza
Corpus Christi, TX 78475**

Office of the Comptroller of the Currency

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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 following table indicates the performance level of **American Bank, National Association** with respect to the Lending, Investment, and Service Tests:

Performance Levels	American Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	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 major factors that support this rating include:

- Lending activity in both evaluation periods reflects adequate responsiveness to the credit needs in the Nueces County assessment area.
- Small business loan distribution is excellent in both evaluation periods with penetration in low- and moderate-income geographies that exceeds demographic data.
- Loan distribution to businesses of different sizes is good.
- Community development investments reflect an adequate responsiveness to the needs of the Nueces County assessment area.
- Delivery systems provide reasonable access to geographies and individuals of different income levels.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout 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. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

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 MA/assessment area.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, 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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full 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 or a block numbering area 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 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 (e.g., approved, denied, and withdrawn).

Home Mortgage Loans: such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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

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

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

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

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development 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 it and half below it.

Metropolitan Area (MA): Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

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

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

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

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

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

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

Rated Area: A rated area is a state or multi-state 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 multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the 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 One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

Description of Institution

American Bank, N.A. (ABNA) is an intrastate bank headquartered in Corpus Christi, Texas. The bank is a wholly owned subsidiary of American Bank Holding Corporation, a two-bank holding company based in Corpus Christi, Texas. Consolidated total assets of the holding company were \$623 million at June 30, 2004. The bank itself has a wholly owned insurance sales subsidiary, American Financial Insurance Services, Inc. ABNA does not have any other operating subsidiaries or affiliates that affect its capacity to lend or invest in the community. ABNA offers a full range of loan and deposit products as well as trust, insurance, and brokerage services. The ABNA website (www.americanbank.com) offers limited services, such as bill pay and online banking.

ABNA operates nine full service branches, including the main office. Six of the nine branches are located in Corpus Christi. The other branches are located in the cities of Rockport, Port Aransas, and Austin. Automatic teller machines (ATMs) are available at all branches, except the Rockport branch. However, an ATM is to be installed in the near future. In addition, ABNA has four remote ATMs located in Corpus Christi and one located in Port Aransas. In June 2004, the bank opened a loan production office in the city of Lakeway, Travis County, Texas.

American Bank, N.A. is the second largest independent banking organization headquartered in Nueces County, where it also ranks second in market share of deposits. Based on the June 30, 2003 Summary of Deposits market share reports, ABNA is the third largest bank, in terms of deposits, of all banks located in Nueces County. However, the two largest banks, Bank of America and Frost National Bank, have significant deposits outside the Nueces County area.

As of June 30, 2004, ABNA reported total assets of \$582 million. Net loans represented 73 percent of total assets and 79 percent of total deposits. Tier 1 capital totaled \$41.5 million, or 7.13 percent of total assets. The primary lending focus of the bank remains commercial lending with commercial and commercial real estate loans representing 80 percent of the loan portfolio. Residential loans represent 11 percent of the loan portfolio, consumer loans represent 5 percent, and agricultural loans represent 4 percent. ABNA originates a large volume of residential loans that are sold on the secondary market. ABNA is an active Small Business Administration (SBA) lender and had 136 loans guaranteed by the SBA with outstanding balances totaling \$14 million at July 31, 2004. Based on the financial condition, size, product offerings, and branch network of the bank, there are not any legal, financial, or other factors that inhibit its ability to help meet the credit needs in its assessment areas.

During the evaluation period, ABNA's strategic plan was to provide a wide range of financial services to consumers and small businesses, and to provide excellent customer service within its market areas. The bank offers a variety of loan products, including, but not limited to, commercial, commercial real estate, residential purchase and construction, home improvement, home equity, and personal loans. The bank also recently introduced home equity lines of credit to its product offering.

ABNA's performance under the Community Reinvestment Act was evaluated last, using standards applicable to large banks, on October 1, 2001. The overall level of performance was "Satisfactory". A review of OCC records, as well as the bank's own CRA Public File, did not reveal any complaints relating to the CRA performance of the bank since the last evaluation.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses ABNA's performance under the Lending, Investment, and Service Tests. In evaluating the lending performance, we reviewed home mortgage and small business loans. The evaluation period for the Lending Test was from January 1, 2001 through December 31, 2003.

During this period, the data compiled by the U. S. Census Bureau and the U. S. Department of Housing and Urban Development (HUD) pursuant to the 2000 Census was published. The 2000 census data resulted in changes to the demographic information for ABNA's assessment areas. Population density and income characteristics changed, as did income designations for several census tracts. Refer to Appendix B for additional information.

Due to the changes in the census data, the evaluation of ABNA's performance under the Lending Test is presented in two parts. The tables appearing in Appendix C reflect ABNA's performance during the period from January 1, 2001 through December 31, 2002 using data provided by the 1990 U. S. Census, as well as the bank's performance during the period from January 1, 2003 through December 31, 2003 using data provided by the 2000 U. S. Census.

For Community Development Loans and the Investment and Service Tests, the evaluation period covers October 2, 2001 through August 23, 2004. The Investment Test conclusions are based on an evaluation of investments, grants, and donations that meet the definition of community development. The Service Test was evaluated based on branch distribution, hours of operation, branch openings and closings, alternative delivery systems, retail and commercial deposit and loan products and services, and community development services.

Data Integrity

In April 2004, OCC examining personnel verified the accuracy of data made available to the public in accordance with the Home Mortgage Disclosure Act (HMDA) and the CRA regulation. Public data includes home mortgage lending and small loans to businesses and farms. In addition, nonpublic data that was submitted by ABNA for community development loans, services, and investments was reviewed to ensure they qualified as community development under the CRA regulation. Based on the verification work we performed, publicly reported lending data is considered accurate. All of the data reported for the above categories was used in this evaluation.

Selection of Areas for Full-Scope Review

American Bank, N.A. has designated two assessment areas – Nueces County and Travis County. The Nueces County AA received a full-scope review because the bank is headquartered in this county and a substantial majority of the bank's business is based in this AA. In the 2001 – 2002 evaluation period, the Nueces County branches accounted for 99 percent of the deposits and 99 percent of the reportable loan originations. In the 2003 evaluation period, these same branches accounted for 98 of the deposits and 95 percent of the reportable loan originations.

The Travis County AA received a limited scope review because it represents a smaller part of the bank's business. ABNA operates one branch in Travis County, which accounted for 1 percent of deposits and less than 1 percent of reportable loans originated in the 2001 – 2002 evaluation period. The one branch in Travis County accounted for 2 percent of the deposits and 5 percent of the reportable loans originated in the 2003 evaluation period. Please refer to the tables in Appendix C for more information.

Ratings

ABNA's overall rating is based primarily on the performance in Nueces County, the area that received a full-scope review. Small business loans were weighted more heavily than home mortgage loans given the number and dollar volume of small business loans originated during the evaluation period and because commercial lending is the primary focus of the bank. Home purchase loans were given more weight than home improvement loans or refinance loans in the home mortgage loan category since the bank originated more home purchase loans. Loans to small farms were not considered since only 16 such loans originated during the evaluation period.

Other

Two community organizations in Corpus Christi, Texas were contacted during the evaluation. The individuals contacted at both organizations deal with overall community development issues within the city and county. Both individuals indicated that opportunities exist in the Corpus Christi area to invest in community development. Many of the opportunities are with or through the Community Development Corporation. Specifically identified credit needs include loans for small businesses and affordable housing programs. Because Travis County received only a limited-scope review, no contacts were made in that area.

Fair Lending Review

An analysis of the most recent public comments, consumer complaint information, HMDA, small business, and small farm lending data was performed according to the OCC's risk-based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in May 2003.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "**Low Satisfactory**". Based on the full-scope review, the bank's performance in the Nueces County assessment area is adequate.

Lending Activity

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

ABNA's lending activity in both evaluation periods reflects an adequate responsiveness to the credit needs within the Nueces County assessment area. Since the previous CRA evaluation in October 2001, ABNA's loan-to-deposit ratio has averaged approximately 76 percent and is comparable to the other similarly situated financial institution headquartered in Nueces County. At December 31, 2003, commercial and commercial real estate loans represented 64 percent of net loans and residential real estate loans represented 14 percent.

In the 2001-2002 Evaluation Period, ABNA made 1,314 loans totaling \$123 million to small businesses. Home mortgage loans originated in the same time period numbered 1,014 and totaled \$107 million. For the 2003 Evaluation Period, ABNA made 644 loans totaling \$63 million to small businesses. Home mortgage loans originated in the same time period numbered 619 and totaled \$72 million. The bank did not elect to report consumer loan activity for either evaluation period since it is not a primary loan product.

For both evaluation periods, ABNA is ranked second in deposit market share. In the 2001 – 2002 Evaluation Period, it had 12.89 percent of the deposit market share. In the 2003 Evaluation Period, the deposit market share was 12.92 percent. Based on the 2002 aggregate small business data, ABNA ranked fourth in small business loans with a 7.61 percent market share. Based on the 2002 peer mortgage data, ABNA ranked fifth with an overall market share of 3.67 percent for all home mortgage loans. Market share lending data for 2003 was not available.

Distribution of Loans by Income Level of the Geography

The geographic distribution of small business and home mortgage loans is adequate. The home mortgage loan distribution is poor for both evaluation periods; however, this is not a significant loan product for ABNA. More weight is given to the geographic distribution of small business loans because these types of loans are the primary lending focus of the bank. Small business loan distribution is excellent in both evaluation periods with penetration in low- and moderate-income geographies that exceeds the demographics.

Home Mortgage Loans

Refer to Tables 2, 3, 4, and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

ABNA's distribution and penetration of home mortgage loans by income level of geographies is poor.

Home Purchase Loans

The geographic distribution of home purchase loans is poor. The distribution of loans is well below the proportion of owner-occupied housing units located in low- or moderate-income geographies. Relative to its overall market share, the bank actually has a disproportionate share of home purchase lending.

Home Improvement Loans

The geographic distribution of home improvement loans is poor. The distribution of loans is well below the proportion of owner-occupied housing units located in low- or moderate-income geographies. The bank's market share in both low- and moderate-income geographies is less than its overall market share.

Home Mortgage Refinance Loans

The geographic distribution of home mortgage refinance loans is poor. The distribution of loans is well below the proportion of owner-occupied housing units located in low- or moderate-income geographies. The bank's market share in low- or moderate-income geographies is less than its overall market share.

Multi-Family Loans

An evaluation of the geographic distribution of multi-family loans is not meaningful since very few loans of this type were originated in the Nueces County assessment area during either evaluation period.

Small Loans to Businesses

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small business loans is excellent. In the 2001-2002 Evaluation Period, the percentage of small business loans originated in both the low- and moderate-income geographies exceeds the percentage of small businesses in the low- and moderate-income geographies. ABNA made 8.75 percent of its small business loans to businesses located in low-income geographies, but only 7.68 percent of small businesses are located in low-income geographies.

In the 2003 Evaluation Period, the percentage of small business loans originated in low- and moderate-income census geographies significantly exceeds the percentage of small

businesses in the low- or moderate-income geographies. ABNA made 25 percent of its small business loans to businesses located in low-income geographies; however, only 14.44 percent of small businesses are located in low-income geographies.

ABNA's market share of business loans in low- and moderate-income areas is 11.07 percent and 9.69 percent, respectively for the 2001 – 2002 Evaluation Period, as compared to its overall market share of 7.62 percent. Market share data for 2003 is not available.

Small Loans to Farms

Refer to Table 7 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The geographic distribution of small loans to farms is not relevant due to the small number of originations during the evaluation periods. Agricultural loans are not a primary loan product or business focus of the bank. As of December 31, 2003, agricultural loans represented less than 4 percent of the loan portfolio.

Lending Gap Analysis

The bank's lending activities in the two evaluation periods were reviewed to determine whether any gaps exist in the geographic distribution of home mortgage and small business loans. No unexplained gaps were identified.

Inside/Outside Ratio

ABNA's distribution of loans inside/outside of its assessment areas is excellent. A substantial majority of the loans originated or purchased during the evaluation periods were within the Nueces County and Travis County assessment areas. Of the small business and home mortgage loans originated or purchased during the 2001 – 2002 Evaluation Period, 83 percent of the loans were made in the assessment areas. By loan type, 89 percent of the small business loans, 76 percent of the home mortgage loans, and 71 percent of the small farm loans were originated or purchased inside the assessment areas. For the 2003 Evaluation Period, 82 percent of the loans were originated or purchased in the assessment areas. By loan type, 88 percent of the small business loans, 76 percent of the home mortgage loans, and 67 percent of the small farm loans were originated or purchased in the assessment areas. ABNA's lending performance was positively factored into the overall analysis of the geographic distribution of lending.

Distribution of Loans by Income Level of the Borrower

ABNA's distribution of loans to borrowers of different income levels and businesses of different sizes is adequate. Lending to small businesses is the most significant factor in assessing the borrower distribution. In both evaluation periods, ABNA achieved good penetration to businesses with revenues of \$1 million or less and poor penetration in home mortgage products to low- and moderate-income individuals.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home Purchase Loans

ABNA's record of lending to low- and moderate-income individuals for home purchase loans is poor. The percentage of loans made to both income groups is significantly less than the percentage of families in each of these categories. ABNA's market share to both low- and moderate-income individuals is well below its overall market share.

Home Improvement Loans

ABNA's record of lending to low- or moderate-income individuals for home improvement loans is poor. The percentage of loans made to both income groups is well below the percentage of families in each of those categories. The market share of loans made to low-income individuals is well below the bank's overall market share. However, the market share of loans to moderate-income individuals is close to the bank's overall market share.

Refinance Loans

ABNA's record of lending to low- or moderate-income individuals for refinance loans is poor. The percentage of loans made to both income groups is significantly less than the percentage of families in each of these categories. ABNA's market share to both low- and moderate-income individuals is well below its overall market share.

Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of loans to small businesses is good.

For the 2001 – 2002 Evaluation Period, about 62 percent of the small business loans were made to businesses with annual gross revenues of \$1 million or less. These businesses represented 73 percent of the businesses in Nueces County. Of these loans, about 79 percent were originated in amounts of \$100,000, or less, and another 12 percent were in amounts of \$100,000 to \$250,000. ABNA's market share for loans to small businesses, 15.17 percent, significantly exceeds its overall market share of 7.62 percent.

For the 2003 Evaluation Period, about 57 percent of the small business loans were made to businesses with annual revenues of \$1 million or less. These businesses represented 63 percent of the businesses in Nueces County. Of the originated loans, 77 percent were made in amounts of \$100,000 or less, and approximately another 14 percent were made in amounts between \$100,000 and \$250,000. Market share data for 2003 is not available.

Small Loans to Farms

Refer to Table 12 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to farms.

As reflected in Tables 1 and 12, ABNA originates very few agricultural loans, as such, these loans were not considered in evaluating the bank's overall performance.

Community Development Lending

Refer to Table 1 - Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development (CD) lending.

Community development lending had a positive effect on the Lending Test conclusion. The level of CD lending is good and it enhances the overall level of small business lending in the Nueces County assessment area. During the two evaluation periods, ABNA originated eight loans totaling \$4.1 million that qualify as community development loans. A majority of these loans were made to a builder that specializes in constructing affordable housing projects targeted to low- and moderate-income individuals.

ABNA also received positive consideration for \$847 thousand in CD loans originated by the Corpus Christi Community Development Corporation (CDC) and by the Independent Bankers Capital Fund, L.P., which is a qualified Small Business Investment Corporation (SBIC). During the two evaluation periods, the CDC funded \$1.8 million in affordable housing loans. The bank's qualifying portion for the CDC loans is \$500 thousand. The SBIC funded \$16 million in small business loans. The bank's qualifying portion on the SBIC loans is \$347 thousand.

Product Innovation and Flexibility

ABNA does not offer any innovative products. However, ABNA has partnered with local organizations that offer flexible and affordable loan programs for home purchase and home improvement financing targeted to low- and moderate-income families. Through these organizations, ABNA has made seven home purchase loans totaling \$570 thousand.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope review, the bank's performance under the lending test in the Travis County assessment area is not inconsistent with the bank's overall "Low Satisfactory" rating performance under the lending test.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

ABNA's performance under the Investment Test is rated "Low Satisfactory". Based on the full-scope review, the bank's performance in the Nueces County assessment area is adequate given the size and resources of the bank. Refer to Table 14 for the facts and data used to evaluate the bank's level of qualified investments.

Qualifying investments are investments, deposits, membership shares, or grants that have as their primary purpose community development, as defined in the Community Reinvestment Act regulation. ABNA made equity capital injections, donations, and contributions that resulted in \$242 thousand in qualified investments during the evaluation period. Although ABNA's qualifying investments are not complex or innovative, they demonstrate responsiveness to meeting identified credit and community development needs in the assessment areas of the bank. Specific examples of qualified investments include:

ABNA made three capital injections totaling \$179 thousand to the Independent Bankers Capital Fund, L.P., a qualified SBIC serving the state of Texas. An unfunded portion of \$194 thousand remains out of the original \$500 thousand commitment. Based on its investment level, the bank has an equity interest equal to 2.1645 percent in the SBIC. Since its inception in November 1999, the SBIC has funded \$21.8 million in loans in Texas. To date, none of the originated loans are located in Nueces County. However, the qualifying investment is located within a broad regional area surrounding the assessment area and eventually loans should be made that benefit Nueces County.

ABNA also made \$63 thousand in donations/contributions to a number of organizations that provide services for low- and moderate-income individuals. Some of the larger donations include the following:

- Women's Shelter - \$21 thousand: Community services targeted to victims of domestic or sexual abuse. This nonprofit organization provides shelter and assistance to female victims and their children. Documentation indicates that 96 percent of the victims that used the shelter were designated low- or moderate-income.
- Mary McLeod Bethane Day Nursery - \$15 thousand: Community service targeted to providing low cost day care to low- and moderate-income individuals. The state contracted with the nursery to provide services under a state program specifically to children of low-income families. The bank's donation was combined with other funds raised to provide equipment for a new nursery and building material for a new classroom.
- Youth Odyssey - \$5 thousand: Community services targeted to providing youth programs for at-risk children in Nueces County and surrounding counties. The group is funded solely by grants and donations. Statistics offered by the organization indicate that 100 percent of the participants are from low-income families.
- Corpus Christi Metro Ministries - \$4.8 thousand: Community services targeted to helping low-income individuals. This nonprofit organization, located in a low-income census tract, provides assistance to victims of domestic abuse, women and children, the mentally ill, the elderly, parolees, ex-convicts, and the homeless. Meals, clothing, medical treatment, childcare, and job placement assistance are provided at no cost to the individuals requesting assistance.

Conclusions for Area Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in the Travis County AA is not inconsistent with the bank's overall "Low Satisfactory" performance under the investment test. In the Travis County assessment area, the bank's performance is weaker than the bank's overall performance. The performance level is mitigated by the bank's limited presence in the Travis County market. Competition in this market is aggressive and requires ABNA to compete with significantly larger national and regional financial institutions. The June 30, 2003 Summary of Deposits for institutions in Travis County reflects that the ABNA branch located in Travis County ranks 33rd with a deposit market share of only 0.11 percent. Minimal weight was given to the investment results in the limited-scope assessment area due to the nominal market share in this assessment area.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Low Satisfactory." Based on a full-scope review, the bank's performance in the Nueces County assessment area is adequate.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

ABNA's delivery systems provide reasonable access to geographies and individuals of different income levels in the Nueces County assessment area. The bank operates six branch offices and thirteen ATMs (including five remote ATMs) in the assessment area. Five of the six offices are located in Corpus Christi and the sixth is located in Port Aransas. All of the offices are located on major thoroughfares. The remote ATMs are located in public places such as hospitals and grocery stores.

During the 2001 - 2002 Evaluation Period, ANBA's main office and its Uptown branch were located in a moderate-income census tract. The 2000 Census resulted in a change to the census tract characteristics and it is now designated a low-income census tract. The main office provides a variety of accessible banking services, including trust and investment services. Even though there are not any offices located in moderate-income census tracts, several offices, including the two downtown Corpus Christi offices and the South office, are located adjacent to moderate-income census tracts. In addition, two of the remote ATMs are located in moderate-income census tracts. Aside from the lack of offices in moderate-income areas, the geographic distribution of branches and ATMs in low- and moderate-income census tracts compares favorably to the demographics of the Nueces County assessment area.

The bank did not open or close any offices in the Nueces County assessment area during either evaluation period.

Banking hours are consistent throughout the assessment area. All offices are open at least from 9:00 A.M. to 4:00 P.M., with four offices open until 5:00 P.M. on Fridays. Mini-bank and

Motor bank locations are open between 7:00 A.M. and 7:00 P.M. All offices, except the two downtown locations, are open on Saturday from 9:00 A.M. to 1:00 P.M.

Alternative delivery systems are reasonably effective in providing banking services to low- and moderate-income individuals. The bank's website, www.americanbank.com, offers limited on-line services (commercial as well as consumer) that include bill pay, consumer loan applications, and account transfers. ABNA also offers free 24-hour telephone banking service (with a Spanish language option), which provides the ability to transfer funds as well as check account balances.

ABNA makes banking services generally more available than many of its competitors because it remains open for business on many of the traditional bank holidays. For example, all offices are open on Martin Luther King Day, President's Day, Columbus Day, and Veterans Day. Motor banks are closed only on Independence Day, Thanksgiving, Christmas, and New Years Day.

Community Development Services

ABNA has demonstrated good performance in providing CD services to the Nueces County assessment area based on the number of organizations it has served and the impact of these organizations on identified CD needs in the community. While CD services generally lack innovativeness, they do indicate responsiveness in meeting community needs. Specific examples where ABNA provided financially related educational or technical assistance include, but are not limited to, the following organizations:

- Corpus Christi Community Development Corporation - Three bank officers, including the bank's chief lending officer, have served on the board during the evaluation period. This organization originates loans for purchasing or constructing homes for low- and moderate-income families or in low- and moderate-income geographies. The board not only provides oversight but also allocates Community Development Block Grant monies for down payment assistance programs.
- Harbor House/Karen Henry Foundation - This nonprofit organization provides housing to individuals with severe disabilities who live below the poverty level. A bank officer sits on the Board of Directors and also serves on the Finance Committee. He offers technical assistance on financial matters, and in his capacity as board member monitors compliance with HUD and FHLB income requirements.
- Food Bank of Corpus Christi - A bank loan officer serves on the board of directors, providing technical assistance and financial guidance. In this capacity, the officer assists in planning, establishing, and reviewing major policies and programs, and ensuring that the nonprofit remains fiscally sound.
- In 2002, several bank employees participated in a one-day workshop, Independent City, related to personal financial matters. Employees educated at-risk teens about banking products and services and also offered financial advice. Students participating in the workshop were affiliated with Temporary Aid to Needy Families (TANF).

- Bank employees also participated in fundraising efforts that directly benefited low- and moderate- income individuals. Fundraising proceeds for the Walk With Pride were used to purchase shoes and school supplies for children of low-income families. Dress For Success fundraising proceeds were used to purchase professional clothing for low- to moderate-income women to wear during the job interview process.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Travis County assessment area is not inconsistent with the bank's overall "Low Satisfactory" performance under the Service Test. The bank's lack of performance in this assessment area is mitigated by the limited number of offices located in the Travis County assessment area and also by the aggressive level of competition. Refer to Table 15 in Appendix C for the facts and data that support these conclusions.

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 metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/01 to 12/31/03 Investment and Service Tests and CD Loans: 10/02/01 to 08/23/04	
Financial Institution	Products Reviewed	
American Bank, N.A. Corpus Christi, Texas	Home Mortgage Loans Small Business Loans Community Development Loans Community Development Investments Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Nueces County Travis County	Full-Scope Limited-Scope	

Appendix B: Market Profiles for Full-Scope Areas

NUECES COUNTY ASSESSMENT AREA

Demographic Information for Full Scope Area: Nueces County – Based on 1990 Census Data						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	64	10.94	20.31	31.25	34.37	3.13
Population by Geography	291,145	8.70	22.58	35.73	32.98	0.01
Owner-Occupied Housing by Geography	58,066	5.17	22.17	36.84	35.82	0.00
Business by Geography	18,883	7.68	27.33	34.37	30.62	0.00
Farms by Geography	485	2.68	20.00	43.09	34.23	0.00
Family Distribution by Income Level	74,413	23.70	15.70	18.99	41.61	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	29,318	15.29	30.67	34.89	19.15	0.00
Median Family Income HUD Adjusted Median Family Income for 2002 Households Below Poverty Level		28,499 42,300 19.76%	Median Housing Value Unemployment Rate (1990 US Census)		52,556 3.88%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 US Census and 2002 HUD updated MFI

Demographic Information for Full Scope Area: Nueces County – Based on 2000 Census Data						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	64	12.50	23.44	37.50	26.56	0.00
Population by Geography	313,645	7.65	27.78	35.78	28.79	0.00
Owner-Occupied Housing by Geography	67,687	4.68	24.99	36.41	33.92	0.00
Business by Geography	19,498	14.44	25.24	36.56	23.76	0.00
Farms by Geography	545	6.42	21.10	45.87	26.61	0.00
Family Distribution by Income Level	80,043	22.89	16.67	19.48	40.96	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	31,667	12.78	38.70	32.93	15.59	0.00
Median Family Income HUD Adjusted Median Family Income for 2003 Households Below Poverty Level		40,856 45,700 16.83%	Median Housing Value Unemployment Rate (1990 US Census)		67,100 3.36%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 2000 US Census and 2003 HUD updated MFI

ABNA designated Nueces County as an assessment area. Nueces County is the larger of two counties that comprise the Corpus Christi MA, and includes the cities of Corpus Christi and Port Aransas, Texas. This assessment area designation meets the requirements of the regulation and does not arbitrarily exclude low- or moderate-income census tracts. The Nueces County assessment area received a full-scope review.

The 2000 census changed the demographics of Nueces County. These changes resulted in San Patricio County and Aransas County being added to the Corpus Christi MA. The bank updated its assessment area in 2004 to reflect these changes. However, since our analysis is based on 2001, 2002, and 2003 data, and the additions of Aransas and San Patricio Counties were made in 2004, the evaluation only includes Nueces County.

Competition for loan and deposit customers is strong in the assessment area. The strongest competition comes from branch offices of mid-sized and large/multinational banks. The major competitors for both loans and deposits are Bank of America, Wells Fargo Bank, Frost National Bank, and FirstCapital Bank, SSB. Except for FirstCapital Bank, all of these institutions are headquartered outside the assessment area. Numerous credit unions serve the area and also provide competition.

Based on June 30, 2003 data from the FDIC's Summary of Deposits, Market Share Report for Nueces County, ABNA had the third largest deposit market share with 15.48 percent of the deposits in the assessment area.

The population for Nueces County rose from the 291 thousand reported at the 1990 Census to 314 thousand at the 2000 Census. Population growth since the 2000 Census has been modest. Nueces County is divided into 64 census tracts. In 1990, the census tracts were designated as: 7 low-income, 13 moderate-income, 20 middle-income, 22 upper-income, and 2 did not report any income. In 2000, several of the census tracts had changed characteristics and the changes resulted in census tracts designated as: 8 low-income, 15 moderate-income, 24 middle-income, and 17 upper-income.

The economy is stable and relatively diversified with employment sources from key industries including oil and gas, local government, health care, and area military installations. The largest employers include the Corpus Christi Independent School District, the City of Corpus Christi, the Christus Spohn Medical System, and the U.S. Army Depot.

The two community contacts conducted during the examination revealed that the primary needs of the assessment area are affordable housing programs and loans for small businesses. Both contacts indicated that opportunities exist in the Corpus Christi area to invest in community development. Both contacts indicated the area banks are generally meeting the credit needs of the community.

Appendix C: Tables of Performance Data

Content of Standardized 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: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses 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) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Home Mortgage Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.
- Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table 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 within each geography. For borrower distribution, the table 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 of households by income level in each MA/assessment area. **{This table was not populated since the bank did not elect to report consumer loans.}**
- Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and

investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1a. Lending Volume

LENDING VOLUME												
Geography: TEXAS												
Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA *	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Nueces County AA - 2001/2002	99.32	1,014	107,268	1,314	122,723	10	1,235	5	2,339	2,343	233,565	98.52
Limited Review:												
Travis County AA - 2001/2002	0.68	9	928	7	226	0	0	1	363	17	1,517	1.48

Table 1b. Lending Volume

LENDING VOLUME												
Geography: TEXAS												
Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA °	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans °°		Total Reported Loans		% of Rated Area Deposits in MA/AA °°°
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Nueces County AA - 2003	95.20	619	72,082	644	63,253	6	1,066	3	1,776	1,272	138,177	97.83
Limited Review:												
Travis County AA - 2003	4.80	25	3,410	39	5,161	0	0	18	1,834	82	10,405	2.17

* Loan Data as of December 31, 2002. ° Loan Data as of December 31, 2003. Rated area refers to either state or multi-state MA rating area.

** The evaluation period for Community Development Loans is from January 01, 2001 to December 31, 2002. °° The evaluation period for Community Development Loans is from January 01, 2003 to August 23, 2004.

*** Deposit Data as of June 30, 2002. °°° Deposit Data as of June 30, 2003. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Table2a. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: TEXAS				Evaluation Period: <u>JANUARY 1, 2001 TO DECEMBER 31, 2002</u>						Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Nueces County AA - 2001/2002	536	99.81	5.17	1.31	22.17	2.80	36.84	30.97	35.81	64.93	4.39	6.35	1.02	4.55	4.75	
Limited Review:																
Travis County AA - 2001/2002	1	0.19	0.00	0.00	0.00	0.00	25.74	100.00	74.26	0.00	0.06	0.00	0.00	0.16	0.00	

Table2b. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: TEXAS				Evaluation Period: <u>JANUARY 1, 2003 TO DECEMBER 31, 2003</u>						Market Share (%) by Geography°				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Nueces County AA - 2003	275	98.21	4.68	0.36	24.99	7.27	36.41	28.00	33.93	64.36	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Travis County AA - 2003	5	1.79	4.16	0.00	21.43	40.00	36.00	60.00	38.41	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data (SW). ° 2003 Market Share is not available.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information and **** based on 2000 Census information.

Table 3a. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: TEXAS					Evaluation Period: <u>JANUARY 1, 2001 TO DECEMBER 31, 2002</u>					Market Share (%) by Geography*				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Nueces County AA - 2001/2002	158	99.37	5.17	0.63	22.17	5.70	36.84	44.94	35.82	48.73	13.43	3.57	6.52	16.67	14.40	
Limited Review:																
Travis County AA - 2001/2002	1	0.63	0.00	0.00	0.00	0.00	25.74	0.00	74.26	100.00	0.00	0.00	0.00	0.00	0.00	

Table 3b. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: TEXAS					Evaluation Period: <u>JANUARY 1, 2003 TO DECEMBER 31, 2003</u>					Market Share (%) by Geography°				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
Full Review:																
Nueces County AA - 2003	70	93.33	4.68	0.00	24.99	8.57	36.41	44.29	33.92	47.14	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Travis County AA - 2003	5	6.67	4.16	0.00	21.43	0.00	36.00	20.00	38.41	80.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data (SW). ° 2003 Market Share is not available.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information and **** based on 2000 Census information.

Table 4a. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: TEXAS					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans	% Owner Occ Units ^{***}	% BANK Loans						
Full Review:																
Nueces County AA - 2001/2002	318	97.85	5.17	0.63	22.17	1.57	36.84	27.67	35.82	70.13	4.11	0.00	0.98	3.67	4.87	
Limited Review:																
Travis County AA - 2001/2002	7	2.15	0.00	0.00	0.00	0.00	25.74	0.00	74.26	100.00	0.16	0.00	0.00	0.00	0.23	

Table 4b. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: TEXAS					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003					Market Share (%) by Geography ^o				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% Owner Occ Units ^{ooo}	% BANK Loans	% Owner Occ Units ^{ooo}	% BANK Loans	% Owner Occ Units ^{ooo}	% BANK Loans	% Owner Occ Units ^{ooo}	% BANK Loans						
Full Review:																
Nueces County AA - 2003	271	94.76	4.68	0.00	24.99	5.54	36.41	36.16	33.92	58.30	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Travis County AA - 2003	15	5.24	4.16	6.67	21.43	6.67	36.00	33.33	38.41	53.33	0.00	0.00	0.00	0.00	0.00	

^{*} Based on 2002 Peer Mortgage Data (SW). ^o 2003 Market Share is not available.

^{**} Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information and ^{ooo} based on 2000 Census information.

Table 5a. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: TEXAS					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]					
	#	% of Total ^{**}	% of MF Units ^{††}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	% MF Units ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Nueces County AA - 2001/2002	2	100.00	9.86	50.00	5.57	0.00	35.28	0.00	49.29	50.00	7.14	33.33	0.00	0.00	0.00	
Limited Review:																
Travis County AA - 2001/2002	0	0.00	0.00	0.00	0.00	0.00	0.79	0.00	99.21	0.00	0.00	0.00	0.00	0.00	0.00	

Table 5b. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: TEXAS					Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [°]					
	#	% of Total ^{**}	% of MF Units ⁰⁰⁰	% BANK Loans	% MF Units ⁰⁰⁰	% BANK Loans	% MF Units ⁰⁰⁰	% BANK Loans	% MF Units ⁰⁰⁰	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Nueces County AA - 2003	3	100.00	8.18	0.00	14.05	0.00	45.41	100.00	32.36	0.00	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Travis County AA - 2003	0	0.00	19.50	0.00	33.11	0.00	32.54	0.00	14.85	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data (SW). ° 2003 Market Share is not available.

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

†† Percentage of Multi-Family Units is the number of multi-family units in a particular geography divided by the number of multi-family housing units in the area based on 1990 Census Information and ⁰⁰⁰ based on 2000 Census Information.

Table 6a. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: TEXAS		Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]										
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Nueces County AA - 2001/2002	1,314	99.47	7.68	8.75	27.33	34.17	34.37	36.15	30.62	20.93	7.62	11.07	9.69	9.88	5.38						
Limited Review:																					
Travis County AA - 2001/2002	7	0.53	0.00	0.00	0.00	0.00	20.82	14.29	79.18	85.71	0.05	0.00	0.04	0.02	0.08						

Table 6b. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															Geography: TEXAS		Evaluation Period: JANUARY 1, 2003 TO DECEMBER 31, 2003				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ^o										
	#	% of Total ^{**}	% of Businesses ^{ooo}	% BANK Loans	% of Businesses ^{ooo}	% BANK Loans	% of Businesses ^{ooo}	% BANK Loans	% of Businesses ^{ooo}	% BANK Loans	Overall	Low	Mod	Mid	Upp						
Full Review:																					
Nueces County AA - 2003	644	94.29	14.44	25.00	25.24	25.47	36.56	35.71	23.76	13.82	0.00	0.00	0.00	0.00	0.00						
Limited Review:																					
Travis County AA - 2003	39	5.71	6.58	2.56	20.56	15.38	30.62	30.77	42.24	51.29	0.00	0.00	0.00	0.00	0.00						

^{*} Based on 2002 Peer Small Business Data -- US and PR. ^o 2003 Market Share is not available.

^{**} Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

^{***} Source Data - Dun and Bradstreet (2002) and ^{ooo} Dun and Bradstreet (2003).

Table 7a. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: TEXAS		Evaluation Period: <u>JANUARY 1, 2001 TO DECEMBER 31, 2002</u>											
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography [*]																	
	#	% of Total ^{**}	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	% of Farms ^{***}	% BANK Loans	Overall	Low	Mod	Mid	Upp													
Full Review:																												
Nueces County AA - 2001/2002	10	100.00	2.68	0.00	20.00	10.00	43.09	70.00	34.23	20.00	6.85	0.00	0.00	11.54	11.76													
Limited Review:																												
Travis County AA - 2001/2002	0	0.00	0.00	0.00	0.00	0.00	41.28	0.00	58.72	0.00	0.00	0.00	0.00	0.00	0.00													

Table 7b. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															Geography: TEXAS		Evaluation Period: <u>JANUARY 1, 2003 TO DECEMBER 31, 2003</u>											
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography ^o																	
	#	% of Total ^{**}	% of Farms ^{ooo}	% BANK Loans	% of Farms ^{ooo}	% BANK Loans	% of Farms ^{ooo}	% BANK Loans	% of Farms ^{ooo}	% BANK Loans	Overall	Low	Mod	Mid	Upp													
Full Review:																												
Nueces County AA - 2003	6	100.00	6.42	0.00	21.10	33.33	45.87	50.00	26.61	16.67	0.00	0.00	0.00	0.00	0.00													
Limited Review:																												
Travis County AA - 2003	0	0.00	3.41	0.00	20.56	0.00	37.97	0.00	38.06	0.00	0.00	0.00	0.00	0.00	0.00													

^{*} Based on 2002 Peer Small Business Data -- US and PR. ^o 2003 Market Share is not available.

^{**} Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

^{***} Source Data – Dun and Bradstreet (2002) and ^{ooo} Dun and Bradstreet (2003).

Table 8a. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: TEXAS				Evaluation Period: <u>JANUARY 1, 2001 TO DECEMBER 31, 2002</u>						Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Farms***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Nueces County AA - 2001/2002	536	99.81	23.70	1.52	15.70	4.94	18.99	16.35	41.61	77.19	5.03	1.85	0.88	3.67	6.84	
Limited Review:																
Travis County AA - 2001/2002	1	0.19	6.33	0.00	7.54	0.00	12.63	100.00	73.50	0.00	0.07	0.00	0.00	0.43	0.00	

Table 8b. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: TEXAS				Evaluation Period: <u>JANUARY 1, 2003 TO DECEMBER 31, 2003</u>						Market Share°				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ⁰⁰	% Families ⁰⁰⁰	% BANK Loans****	% Families ⁰⁰⁰	% BANK Loans****	% Families ⁰⁰⁰	% BANK Loans****	% Families ⁰⁰⁰	% BANK Loans****						
Full Review:																
Nueces County AA - 2003	275	98.21	22.89	1.91	16.67	8.40	19.48	12.60	40.96	77.09	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Travis County AA - 2003	5	1.79	21.52	40.00	17.95	0.00	21.02	20.00	39.51	40.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data (SW). ° 2003 Market Share is not available.

** As a percentage of loans with borrower income information available, no information was available for 1.9% of loans originated and purchased by the bank. ⁰⁰ No information was available for 4.6% of loans originated and purchased by the bank.

*** Percentage of Families is based on 1990 Census information. ⁰⁰⁰ Percentage of Families is based on 2000 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

Table 9a. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: TEXAS		Evaluation Period: <u>JANUARY 1, 2001 TO DECEMBER 31, 2002</u>											
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share [*]				
	#	% of Total ^{**}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Nueces County AA - 2001/2002	158	99.37	23.70	2.63	15.70	7.89	18.99	15.79	41.61	73.69	13.64	4.92	11.29	9.60	17.55
Limited Review:															
Travis County AA - 2001/2002	1	0.63	6.33	0.00	7.54	0.00	12.63	0.00	73.50	100.00	0.00	0.00	0.00	0.00	0.00

Table 9b. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: TEXAS		Evaluation Period: <u>JANUARY 1, 2003 TO DECEMBER 31, 2003</u>											
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share ^o				
	#	% of Total ^{oo}	% Families ^{ooo}	% BANK Loans ^{****}	% Families ^{ooo}	% BANK Loans ^{****}	% Families ^{ooo}	% BANK Loans ^{****}	% Families ^{ooo}	% BANK Loans ^{****}	Overall	Low	Mod	Mid	Upp
Full Review:															
Nueces County AA - 2003	70	93.33	22.89	6.06	16.67	12.12	19.48	10.61	40.96	71.21	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Travis County AA - 2003	5	6.67	21.52	0.00	17.95	20.00	21.02	0.00	39.51	80.00	0.00	0.00	0.00	0.00	0.00

* Based on 2002 Peer Mortgage Data (SW). ^o 2003 Market Share is not available.

** As a percentage of loans with borrower income information available, no information was available for 3.8% of loans originated and purchased by the bank. ^{oo} No information was available for 5.3% of loans originated and purchased by the bank.

*** Percentage of Families is based on the 1990 Census information. ^{ooo} Percentage of Families is based on the 2000 Census information.

**** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

Table 10a. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: TEXAS				Evaluation Period: <u>JANUARY 1, 2001 TO DECEMBER 31, 2002</u>						Market Share*				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Nueces County AA - 2001/2002	318	97.85	23.70	1.78	15.70	5.34	18.99	16.01	41.61	76.87	5.13	2.19	3.51	4.65	5.66	
Limited Review:																
Travis County AA - 2001/2002	7	2.15	6.33	0.00	7.54	0.00	12.63	14.29	73.50	85.71	0.19	0.00	0.00	0.23	0.20	

Table 10b. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: TEXAS				Evaluation Period: <u>JANUARY 1, 2003 TO DECEMBER 31, 2003</u>						Market Share°				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total ⁰⁰	% Families ⁰⁰⁰	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****						
Full Review:																
Nueces County AA - 2003	271	94.76	22.89	0.43	16.67	8.94	19.48	15.74	40.96	74.89	0.00	0.00	0.00	0.00	0.00	
Limited Review:																
Travis County AA - 2003	15	5.24	21.52	0.00	17.95	28.57	21.02	14.29	39.51	57.14	0.00	0.00	0.00	0.00	0.00	

* Based on 2002 Peer Mortgage Data (SW). ° 2003 Market Share is not available.

** As a percentage of loans with borrower income information available, no information was available for 11.4% of loans originated and purchased by the bank. ⁰⁰ No information was available for 12.9% of loans originated and purchased by the bank.

*** Percentage of Families is based on the 1990 Census information. ⁰⁰⁰ Percentage of Families is based on the 2000 Census information.

**** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

Table 11a. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: TEXAS			Evaluation Period: <u>JANUARY 1, 2001 TO DECEMBER 31, 2002</u>				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Nueces County AA - 2001/2002	1,314	99.47	73.34	61.80	78.84	12.48	8.68	7.62	15.17
Limited Review:									
Travis County AA - 2001/2002	7	0.53	62.53	71.43	100.00	0.00	0.00	0.05	0.12

Table 11b. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: TEXAS			Evaluation Period: <u>JANUARY 1, 2003 TO DECEMBER 31, 2003</u>				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share ^o	
	#	% of Total**	% of Businesses ^{ooo}	% BANK Loans ^{oooo}	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Nueces County AA - 2003	644	94.29	63.43	56.68	77.33	13.98	8.69	0.00	0.00
Limited Review:									
Travis County AA - 2003	39	5.71	61.83	53.85	76.92	7.69	15.39	0.00	0.00

* Based on 2002 Peer Small Business Data -- US and PR. ^o 2003 Market Share is not available.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2002) and ^{ooo} (Source D&B - 2003).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 10.90% of small loans to businesses originated and purchased by the bank.

^{oooo} No information was available for 14.35% of small loans to businesses originated and purchased by the bank.

Table12a. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: TEXAS			Evaluation Period: <u>JANUARY 1, 2001 TO DECEMBER 31, 2002</u>				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Nueces County AA - 2001/2002	10	100.00	92.16	80.00	50.00	40.00	10.00	6.85	7.14
Limited Review:									
Travis County AA - 2001/2002	0	0.00	91.74	0.00	0.00	0.00	0.00	0.00	0.00

Table12b. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: TEXAS			Evaluation Period: <u>JANUARY 1, 2003 TO DECEMBER 31, 2003</u>				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share°	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Nueces County AA - 2003	6	100.00	90.83	83.33	16.67	83.33	0.00	0.00	0.00
Limited Review:									
Travis County AA - 2003	0	0.00	87.20	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2002 Peer Small Business Data -- US and PR. ° 2003 Market Share is not available.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2002) and *** (Source D&B - 2003).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
			Geography: TEXAS		Evaluation Period: JANUARY 1, 2001 THROUGH AUGUST 23, 2004				
MA/Assessment Area:	Prior Period Investments [*]		Current Period Investments		Total Investments			Unfunded Commitments ^{**}	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Nueces County AA	0	0	43	242	43	242	96.41	1	194
Limited Review:									
Travis County AA	0	0	5	9	5	9	3.59	0	0

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

^{**} 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Table 15a. Distribution of Branch Delivery System and Branch Openings/Closings – 1990 Census Information

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: TEXAS																	
Evaluation Period: <u>JANUARY 1, 2001 TO DECEMBER 31, 2002</u>																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Nueces County AA - 2001/2002	98.52	8	88.89	0.00	25.00	25.00	50.00	0	0	0	0	0	0	8.70	22.58	35.73	32.99
Limited Review:																	
Travis County AA - 2001/2002	1.48	1	11.11	0.00	0.00	0.00	100.00	1	0	0	0	0	+1	0.00	0.00	23.42	76.58

Table 15b. Distribution of Branch Delivery System and Branch Openings/Closings – 2000 Census Information

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: TEXAS																	
Evaluation Period: <u>JANUARY 1, 2003 TO DECEMBER 31, 2003</u>																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Nueces County AA - 2003	97.83	8	88.89	25.00	0.00	25.00	50.00	0	0	0	0	0	0	7.65	27.78	35.78	28.79
Limited Review:																	
Travis County AA – 2003 **	2.17	1	11.11	0.00	0.00	0.00	0.00	0	0	0	0	0	0	11.53	29.36	32.41	26.40

** For this time period, 0.30% of the population was located in geographies that have not been assigned an income classification.

