



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

October 27, 2003

Community Reinvestment Act Performance Evaluation

**Extraco Banks, N.A.
Charter Number: 13778**

**18 South Main
Temple, Texas 76712**

**Office of the Comptroller of the Currency
Austin Field Office
8310 Capital of Texas Highway North, Suite 250
Austin, TX 78731-1080**

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 the 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.

Description of Institution

Extraco Banks, N.A. (Extraco) is an intrastate bank headquartered in Temple, Texas. All of Extraco's 13 branch offices and 19 automated teller machines (ATMs) are located in the bank's assessment areas (AAs). These areas consist of 53 census tracts (CTs) in Bell and Coryell Counties (Killeen-Temple metropolitan statistical area [MSA]), 46 CTs in McLennan County (Waco MSA), and 3 block-numbering areas (BNAs) in Hamilton County (non-metropolitan AA). The AAs meet the requirements of the regulation and do not arbitrarily exclude any low- or moderate-income (LMI) areas. Extraco elected to exclude one moderate-income CT located in the Killeen-Temple AA. The bank faces a unique circumstance in lending here because this tract houses a military installation under an exclusive contract with another financial institution to provide loans to military personnel. For additional information on Extraco's Killeen-Temple and Waco MSAs, see Market Profile – Demographic Information Tables in Appendix B.

At September 30, 2003, Extraco had total assets of \$846 million and held \$59 million in Tier 1 capital, which represents 7% of total assets. The bank's primary focus is on home mortgage and small business lending within its AAs. Most of the small businesses represent family enterprises and closely held businesses. For additional information on the products and services offered by Extraco, please refer to the bank's CRA Public File.

Extraco is a wholly owned subsidiary of Extraco Corporation, a one-bank holding company headquartered in Waco, Texas. Extraco also conducts mortgage lending activities through a wholly owned subsidiary, Extraco Mortgage Corporation (EMC), one of the largest privately held mortgage operations in the U.S. Another subsidiary, Extraco Community Development Corporation (ECDC), provides loan and investment programs in McLennan County (Waco MSA) that are designed primarily to promote the public welfare. Activities of EMC and ECDC, within the bank's AAs, are included in this Performance Evaluation (PE).

In December 2002, Extraco acquired Heights State Bank, which is located in the City of Harker Heights, Texas, and is part of the Killeen-Temple MSA. This one office was converted to a branch office and is located within a moderate-income CT. This acquisition will have minimal impact on the bank's overall performance assessment.

Extraco's performance was rated "Satisfactory" at the CRA examination in October 2000.

Evaluation Period

We evaluated Extraco and EMC's mortgage and small business lending using data for the period beginning January 1, 2001 through December 31, 2002. For community development (CD) loans, investments and services, and investment programs through ECDC, our evaluation period runs from the ending date of the last CRA examination, which is October 2, 2000, through October 27, 2003, the starting date of this evaluation.

Overall CRA Rating

Institution’s CRA Rating: This institution is rated “Satisfactory.”

The following table indicates the performance level of FNB with respect to the Lending, Investment, and Service Tests:

Performance Levels	Extraco Banks, N.A., Temple, Texas Performance Tests		
	<i>Lending Test*</i>	<i>Investment Test</i>	<i>Service Test</i>
Outstanding			
High Satisfactory		X	
Low Satisfactory	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.

Due to Extraco’s lending focus, we gave the greatest weight to home mortgage and small business lending within the bank’s AAs. Small farm and multifamily lending are given minimal weight and will not be addressed in this evaluation as they do not represent a significant portion of the bank’s loan portfolio and are not major components of Extraco’s lending strategy.

A full-scope review of the Killeen-Temple and Waco AAs was performed since these areas represent 94% of the bank’s deposits and 95% of lending activity during the evaluation period. A limited-scope review was performed on the other AA, which represents Hamilton County, Texas.

One community contact was initiated with a representative of the Waco City Council. In addition, several community contacts initiated by our Office within the past 12 months were also used in the analysis. These contacts were representatives of a number of affordable housing coordinators/non profit organizations within the cities of Killeen, Temple, and Waco. These contacts indicated that the local economies are considered stable. Banking products are considered adequate and easily available. Credit needs most mentioned by these contacts include affordable housing and small business loans. One community contact specifically mentioned that mortgage loans to qualified borrowers for loans of \$50 thousand or less are needed but are not always available through the lending institutions in the Killeen area. Our review of loan originations in 2001 and 2002 indicates that Extraco and EMC originated a small number of mortgage loans of \$50 thousand or less to borrowers located in the Killeen-Temple MSA.

The major factors that support this overall rating and conclusions with respect to performance tests are detailed herein.

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

Extraco's performance under the Lending Test is rated "**Low Satisfactory.**" Based on a full-scope review, the bank's lending performance in the Killeen-Temple and Waco AAs is **adequate**. Extraco's rating is based on its lending performance in making home purchase and small business loans within both AAs. The bank's primary lending market for small loans to businesses is in the Killeen-Temple AA; with mortgage lending originations more evenly distributed between the two full-scope AAs. The level of CD loans and use of innovative and flexible loan products were minimal and had more of a neutral impact of the bank's performance under this test.

Lending Activity

Refer to Tables 1 through 12 in Appendix C for the facts and data used to evaluate the bank's lending activity.

In the Killeen-Temple and Waco AAs, approximately 70% of the loans originated during the evaluation period were home mortgage loans. Small loans to businesses comprised 26% of the loans originated during this period. The volume of small farm loans originated in both AAs combined was 3% and not material.

The Killeen-Temple AA represents 62% of the bank's branch network, 73% of its deposit base, and 54% of the CRA reportable loan volume for this evaluation period. The Waco AA represents approximately 31% of the bank's branch network, 22% of its deposit base, and 41% of the CRA reportable loan volume for this evaluation period. The bank's deposit market share ranking in both AAs is consistent with the loan demand for home mortgage and small business loans and the aggressive loan market especially in the Waco AA.

Distribution of Loans by Income Level of the Geography

Refer to Tables 2 through 6 in Appendix C for the facts and data used to evaluate the geographic distribution of Extraco's home mortgage and small business loan originations.

Killeen-Temple AA

The overall geographic distribution of Extraco's loan originations in this AA is **adequate**.

The percentage of home purchase loans in low-income geographies exceeds the area demographics. However, the percentage of home purchase loans for moderate-income geographies and home improvement and home refinance loans in the LMI geographies is lower than the percentage of owner-occupied housing. Extraco's market share for these three loan products originated in low-income geographies is below its overall market share in this AA. Extraco's market share in the moderate-income tracts is also below their overall market share for home purchase and home refinance loans but exceeds their market share for home improvement loans. The low performance in the low-income geography is not surprising given that there is only one low-income census tract in this AA. Less than 1% of this tract is owner-occupied housing with only 86 families, of which 52% are low-income.

The percentage distribution of the number of small loans to businesses in LMI geographies is **poor**. The distribution of these loans is well below the comparative demographics in the LMI tracts. Extraco's market share in the LMI areas is well below its overall market share in the AA.

Waco AA

The geographic distribution of Extraco's market share of mortgage-related loans in the Waco LMI geographies is **adequate**. The percentage of home purchase, home improvement, and home refinance loans made in LMI geographies is well below the percentage of owner-occupied housing units that are located in these areas. Extraco's market share of these same loan products originated in the low-income geographies is also below its overall market share. The bank's market share for home purchase and home improvement loans in moderate-income areas is near its overall market share but is well below its overall market share for home refinance loans.

There are 4 low-income and 11 moderate-income census tracts in the Waco AA. Three thousand families reside in the low-income and 11 thousand families reside in the moderate-income CT (31% of all families in this AA). 57% of the households in the low-income and 31% of the households in the moderate-income CT live below the poverty level. This suggests that a significant number of low-income families in the LMI tracts may not qualify for mortgage loans.

The percentage distribution of small loans to businesses is adequate. While the percentage of small loans to businesses in LMI geographies is below the percentage of businesses located in these areas, Extraco's market share in the LMI areas is consistent with its overall market share.

Lending Gap Analysis

Reports detailing Extraco's lending activity over the evaluation period for home mortgage and small business loans were reviewed to identify gaps in the geographic distribution of those loans. No unexplained gaps were identified in either the Killeen-Temple or Waco AAs.

In/Out Ratio Analysis

The in/out ratio analysis will include just the bank loan originations, as inclusion of the EMC's loan production would significantly distort the evaluation of Extraco's efforts to meet the credit demands within its AA's. EMC has production offices in several states and cities outside their AA's.

At the bank level only, the distribution of home mortgage and small loans to businesses within its AAs is excellent. A substantial majority (88%) of the reported number of loans originated is within the bank's AAs. By loan type, 87% of the number of home purchase, 68% of home refinancing, 94% of home improvement, and 92% of small business loans originated within these AAs. This performance was positively factored in the overall analysis of the geographic distribution of lending.

Distribution of Loans by Income Level of Borrower

Refer to Tables 8 through 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage and small business loan originations. In the evaluation of borrower distribution, we gave consideration to the high poverty levels within both AAs. The poverty level in the Killeen-Temple AA was 14% and 21% in the Waco AA.

Due to reasons of affordability, it is unlikely that those with incomes below the poverty level would be eligible for home mortgage financing. Accordingly, we considered this in evaluating the bank's lending distribution to low-income borrowers.

Killeen-Temple AA

The distribution of mortgage-related and small business loans originated and purchased to LMI borrowers is **adequate**.

Although the percentage of home purchase, home improvement, and home refinance loans to LMI borrowers in this AA is substantially below the percentage of LMI borrowers, the distribution is adequate given that 14% of the households live below the poverty level. Extraco's market share of home mortgage loans is good overall. The bank's share of home purchase and home improvement loans to low-income borrowers exceeds its overall market share in this AA. However, Extraco's share for home refinance loans is significantly below its overall market share in this AA. Extraco's share of home purchase, home improvement, and home refinance loans to moderate-income borrowers, is near to, below, and exceeds, respectively, its overall market in this AA.

The percentage of loans to small businesses (businesses with revenues of \$1 million or less) is **good** and near the percentage of businesses that are defined as such. Extraco's share of small business loans in this AA substantially exceeds its overall market share.

Waco AA

The overall percentage distribution of mortgage-related and small business loans originated and purchased to LMI borrowers is **good**.

Although the percentage of home purchase, home improvement, and home refinance loans to low-income borrowers is substantially below the AA demographics, this distribution is good considering the number of families living below the poverty level. The percentage of home purchase, home improvement, and home refinance loans to moderate-income borrowers is near the percentage of borrowers defined as such in the AA. Extraco's share of home purchase, home improvement, and home refinance loans made to LMI borrowers is consistent with its overall market share in the AA.

The percentage of loans to small businesses (businesses with revenues of \$1 million or less) is **good** and near the percentage of businesses that are defined as such. Extraco's share of small loans to businesses in this AA exceeds its overall market share.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in Hamilton County is consistent with the bank's overall "**Low Satisfactory**" Lending Test performance.

Community Development Lending

Please refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of CD lending.

Extraco demonstrated an **adequate** record of granting CD loans that benefit its designated AA's. While the level of new CD lending in the Killeen-Temple AA is poor, good performance in the Waco AA supports this rating. During this evaluation period, Extraco originated 17 CD loans totaling \$1.1 million. This level of lending had a positive impact on the Waco AA, specifically addressing the need for affordable housing within this community.

Killeen-Temple MSA

The bank demonstrated a **poor record** of new CD lending in this AA considering the need for affordable housing within the community and the opportunities for participation that are available. Only two small loans totaling \$47 thousand were originated in this AA that were deemed qualifiable as CD loans.

Waco MSA

Extraco demonstrated **good performance** in this AA by originating 15 CD loans totaling \$1 million during the evaluation period. The bank originated a number of interim construction loans to build single-family residences in the City of Waco, in partnership with the City of Waco's Housing and Community Development Services Department and a local builder. The objective of this program is to build affordable housing for LMI residents.

The bank provided a \$170 thousand interest-free loan to the Waco Habitat for Humanity (Habitat) to construct a facility that will be used to receive new and used building supplies and materials. The overall objective is to assist Habitat in their ongoing efforts to build affordable housing in the Waco area. Extraco has also extended to Habitat a low-interest one-year \$175 thousand line of credit, which permitted Habitat to obtain zero-percent permanent financing for this facility from the City of Waco.

Extraco Community Development Corporation

During this evaluation period, ECDC originated two non-interest bearing loans (one in each full-scope AA) totaling \$64 thousand. These loans were made to Habitat in order to construct two homes for affordable housing to LMI residents.

Product Innovation and Flexibility

Innovative and flexible products had a neutral effect on impacting the bank's lending performance. Extraco made limited use of lending products considered innovative and flexible within the Killeen-Temple and Waco AAs. Extraco has, however, demonstrated some flexibility in its structuring of loan terms with Habitat as previously mentioned.

INVESTMENT TEST

Refer to Table 13 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

The bank's performance under the Investment Test is rated "**High Satisfactory**," as the bank's performance in the Killeen-Temple and Waco AAs had a positive impact on community needs.

During the investment evaluation period from October 2, 2000 through October 27, 2003, the bank purchased 18 qualified investments and grants totaling \$2.4 million. This demonstrates a good responsiveness to community housing and economic development needs.

Killeen-Temple AA

The bank received credit for a prior period investment, a \$1 million FNMA Multifamily Delegated Underwriting and Servicing Bond. This investment is identified by FNMA as “Targeted Affordable Housing.” The property financed was an apartment complex that makes rental housing available for LMI families and addresses affordable housing needs in this AA. Of all rental units, 60% have rent restrictions that increase rental opportunities for LMI persons.

During this evaluation period, the bank made a number of donations to local organizations in this AA, which provide community services targeting LMI individuals and families.

Waco AA

During the evaluation period, the bank invested \$1.3 million in a GNMA PL Bond. This investment provides funding for an apartment complex that is located in a moderate-income CT in Waco. Of the rental units, 100% represent subsidized housing for LMI households under the Federal Government Section 8 rental assistance program. Under this program, the Federal Government rental subsidy equates to the difference between 30% of the household income and the set “fair market” rent of a unit.

During this evaluation period, the bank made a number of donations to local organizations in this AA, which provide community services targeting LMI individuals and families.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank’s performance under the Investment Test in the Hamilton County non-metropolitan AA is weaker than its overall high satisfactory performance under the Investment Test. The low level of investments in this AA is not considered negatively given the limited opportunities.

SERVICES TEST

The bank’s performance under the Service Test is rated “**Low Satisfactory.**” Based on the full-scope reviews, Extraco’s performance is good in the Killeen-Temple AA and poor in the Waco AA. This will not significantly impact the Service Test rating given that there are numerous locally owned banks, credit unions, and branches of larger financial institutions that already exist in the LMI areas, particularly in the Waco AA.

Retail Banking Services

Refer to Table 14 in Appendix C for the facts and data used to evaluate the distribution of the bank’s branches and the opening and closing of those branches.

Extraco operates 13 banking offices and one mortgage company. In 2002, Extraco acquired a bank in the Killeen-Temple AA, which was converted to a branch office. This office is located within a moderate-income CT. No branches have been closed since our previous CRA examination. Each branch offers drive-through banking services. To augment the branch system, Extraco operates 19 proprietary ATMs with no transaction cost to their customers. One ATM is located in a low-income CT and four are in moderate-income CTs. One ATM located in a moderate-income CT accepts deposits. In addition, services are accessible through telephone banking and bank-by-mail.

A wide range of financial services is provided at each branch and is consistent throughout its branch network. Each branch offers full commercial and consumer loans and deposit services and products. Extraco also offers long-term fixed-rate mortgages through its wholly owned subsidiary EMC.

Killeen-Temple AA

The distribution of branches by the CT income level is **good** and in line with the percentage of the population living in the LMI CT of the Killeen-Temple AA. There are a total of eight banking locations in this AA. Two are located in the moderate-income CT (including Extraco's head office in Temple), and three each in the middle- and upper-income CT. Extraco does operate a mobile branch that visits two nursing homes in the city of Temple once a week to accept deposits and cash checks. Fifteen ATMs are located in this area. One is located in the only low-income CT, 4 in moderate-income CTs, 5 in middle-income CTs, and 5 in upper-income CTs.

Waco AA

The distribution in this AA is **significantly below** the percentage of population living in LMI areas. There are four branch locations in this area with two each in middle- and upper-income CTs. Of the population, 36% resides in the LMI CTs. Four ATMs are located in the Waco AA, all of which are situated in either middle- or upper-income CTs.

Community Development Services

In addition to retail banking services, the bank provides an adequate level of CD services. These services include providing assistance to local non-profit organizations that serve LMI areas, individuals, and families.

Killeen-Temple AA

Senior members of Extraco's staff serve as board members or participate in a number of community-based organizations and committees that serve to promote small business, economic development, and job creation and retention. These activities include the Eastside Temple Revitalization Committee and Citizens for Progress. Extraco also initiated programs to conduct public seminars, outreach events, and credit symposiums targeted to LMI individuals and geographies. Topics discussed at these activities include applying for credit, home ownership, investments, retirement, insurance, deposit relationships, and technology services.

Waco Assessment Area

Senior staff members of the bank serve as board members or participate in a number of community based organizations and committees that serve to promote small business, economic development, and job creation and retention. Some of the more important activities personnel are involved in include:

- Quinn Campus Project - Two officers serve as board members on a committee to restore the Paul Quinn Campus, which is located in an LMI area. The campus was deserted in 1990 when Paul Quinn College relocated to Dallas. The committee continues to work on projects to revitalize the surrounding neighborhood and rehabilitate the campus grounds and buildings for use in adult education and business incubation.
- Neighborhood Housing Services of Waco, Inc. and Habitat - Two bank officers serve as board members of these non-profit organizations created to promote home ownership among LMI individuals and assist in fund raising efforts. One officer worked with Habitat to redevelop their marketing plan for informing other financial institutions on prospective lending opportunities with the organization. A bank officer also participated in a Home Ownership Exposition in order to assist Habitat pre-qualify prospective home owners.
- Texas State Technical College (TSTC) in Waco - An officer of the bank assisted this college by reviewing and critiquing a proposal designed for submission to area financial institutions requesting financial assistance for TSTC's Affordable Housing Program.
- United Way - An officer of the bank serves on the board of directors for the United Way in Waco. The United Way helps to raise needed funds for distribution among other non-profit organizations in the area. This organization primarily services low-income families.

Bank personnel also initiated programs to conduct public seminars, outreach events, and credit symposiums targeted to LMI individuals and geographies. These events are principally designed to promote the awareness of the availability of mortgage, consumer, and small business credit. The activities also provided assistance and information concerning how to apply for credit.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, Extraco's performance in the Hamilton non-metropolitan AA is weaker than the bank's overall "Low Satisfactory" performance under the Service Test.

Fair Lending Review

We found no evidence of illegal discrimination or other illegal credit practices.

Appendix B: Market Profiles for Full-Scope Areas

WACO MSA

Demographic Information for Waco MSA, Texas						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs/BNAs)	46	8.70	23.91	36.96	28.26	2.17
Population by Geography	170,407	9.60	26.07	34.64	29.28	0.41
Owner-Occupied Housing by Geography	36,023	3.82	23.16	37.09	35.94	0.00
Businesses by Geography	11,746	3.94	21.51	38.81	34.92	0.81
Farms by Geography	387	0.52	14.47	39.28	45.48	0.26
Family Distribution by Income Level	43,158	22.15	17.05	21.79	39.01	0.00
Distribution of LMI Families throughout AA Geographies	16,917	13.65	37.91	34.99	13.45	0.00
Median Family Income (MFI)	\$28,954	Median Housing Value Unemployment Rate				\$49,845
HUD Adjusted MFI for 2002	\$46,300					3.11%
Households Below the Poverty Level	21.32%					

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

Source: 1990 U.S. Census, and 2002 HUD updated MFI.

KILLEEN-TEMPLE MSA

Demographic Information for Killeen-Temple MSA, Texas						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (CTs/BNAs)	53	1.89	22.64	45.28	30.19	0.00
Population by Geography	236,298	0.14	22.38	50.35	27.13	0.00
Owner-Occupied Housing by Geography	43,665	0.04	11.01	53.39	35.56	0.00
Businesses by Geography	13,680	2.65	21.79	47.40	28.15	0.00
Farms by Geography	500	0.40	10.60	58.80	30.20	0.00
Family Distribution by Income Level	62,441	17.77	19.61	22.23	40.40	0.00
Distribution of LMI Families throughout AA Geographies	23,338	0.28	31.45	50.22	18.05	0.00
Median Family Income (MFI)	\$26,430	Median Housing Value Unemployment Rate				\$54,544
HUD Adjusted MFI for 2002	\$39,800					3.46%
Households Below the Poverty Level	14.26%					

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

Source: 1990 U.S. Census, and 2002 HUD updated MFI.

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/AA. Tables without data are not included in this Performance Evaluation.

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/AA. Community development loans to statewide or regional entities or made outside the bank’s AA 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. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/AA column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in its 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** – See Table 2.
- 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. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s AA.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500 thousand) 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. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s AA.

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/AA. 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 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 thousand) 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. 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 AA. See Interagency Q&As 12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

Table 14. 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.

Institution ID: 10000013778 EXTRACO BANKS, N.A.

Table 1. Lending Volume

LENDING VOLUME		Geography: E BK&MTG HMDA				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002						
MA/AA (2002):	% 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:												
EXTRACO KILEEN TEMPLE	53.58	1,557	154,628	718	58,761	104	4,057	2	47	2,379	217,446	72.68
EXTRACO WACO	41.49	1,404	145,611	397	32,682	41	2,466	15	1,012	1,842	180,759	21.52
Limited Review:												
EXTRACO HAMILTON COUNTY	4.93	71	3,517	84	4,097	64	989	0	0	219	8,603	5.80

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

** The evaluation period for Community Development Loans is From October 3, 2000 to October 27, 2003.

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

Institution ID: 10000013778 EXTRACO BANKS, N.A.

Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE		Geography: E BK&MTG HMDA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/AA	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:																
EXTRACO KILEEN TEMPLE	791	52.91	0.04	0.13	11.01	5.56	53.39	40.20	35.56	54.11	4.84	0.00	4.04	3.67	6.50	
EXTRACO WACO	664	44.41	3.82	0.75	23.16	10.54	37.09	27.86	35.94	60.84	8.49	2.20	7.73	6.82	10.16	
Limited Review:																
EXTRACO HAMILTON COUNTY	40	2.68	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	33.33	0.00	0.00	33.33	0.00	

* Based on 2001 Peer Mortgage Data: Southwest Region.

** 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 housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

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Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: E BK&MTG HMDA				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					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:															
EXTRACO KILEEN TEMPLE	137	56.38	0.04	0.00	11.01	8.76	53.39	35.77	35.56	55.47	11.90	0.00	13.04	9.00	16.08
EXTRACO WACO	100	41.15	3.82	0.00	23.16	9.00	37.09	30.00	35.94	61.00	8.70	0.00	7.02	6.33	12.20
Limited Review:															
EXTRACO HAMILTON COUNTY	6	2.47	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	28.57	0.00	0.00	28.57	0.00

* Based on 2001 Peer Mortgage Data: Southwest Region.

** 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 housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

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Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: E BK&MTG HMDA					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:																
EXTRACO KILEEN TEMPLE	621	48.40	0.04	0.00	11.01	2.90	53.39	33.66	35.56	63.45	5.90	0.00	3.93	3.83	8.74	
EXTRACO WACO	637	49.65	3.82	0.00	23.16	1.57	37.09	28.41	35.94	70.02	12.45	0.00	1.41	12.39	14.96	
Limited Review:																
EXTRACO HAMILTON COUNTY	25	1.95	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	26.32	0.00	0.00	26.32	0.00	

* Based on 2001 Peer Mortgage Data: Southwest Region.

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

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

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Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: E BK&MTG HMDA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
Full Review:																
EXTRACO WACO	3	27.27	21.63	0.00	23.93	66.67	41.33	33.33	13.11	0.00	11.11	0.00	50.00	0.00	0.00	
EXTRACO KILEEN TEMPLE	8	72.73	0.51	12.50	34.47	37.50	39.73	37.50	25.29	12.50	7.84	0.00	15.38	3.23	14.29	
Limited Review:																
EXTRACO HAMILTON COUNTY	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

* Based on 2001 Peer Mortgage Data: Southwest Region.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

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Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: E BK&MTG HMDA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography [*]				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total ^{**}	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans	% of Businesses ^{***}	% BANK Loans						
Full Review:																
EXTRACO KILEEN TEMPLE	718	59.88	2.65	0.56	21.79	9.05	47.40	60.72	28.15	29.67	9.21	0.00	4.37	12.49	9.36	
EXTRACO WACO	397	33.11	3.94	2.02	21.51	13.60	38.81	44.08	34.92	40.30	5.37	6.56	4.94	6.98	5.26	
Limited Review:																
EXTRACO HAMILTON COUNTY	84	7.01	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	28.66	0.00	0.00	31.54	0.00	

* Based on 2001 Peer Small Business Data: US&PR.

** 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).

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Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: E BK&MTG HMDA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans						
Full Review:																
EXTRACO KILEEN TEMPLE	104	49.76	0.40	0.00	10.60	0.00	58.80	83.65	30.20	16.35	41.01	0.00	0.00	51.09	25.00	
EXTRACO WACO	41	19.62	0.52	0.00	14.47	2.44	39.28	26.83	45.48	70.73	25.88	0.00	0.00	18.75	37.14	
Limited Review:																
EXTRACO HAMILTON COUNTY	64	30.62	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	91.49	0.00	0.00	93.48	0.00	

* Based on 2001 Peer Small Business Data: US&PR.

** 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).

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Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: E BK&MTG HMDA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					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 ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}	% Families ^{***}	% BANK Loans ^{****}						
Full Review:																
EXTRACO KILEEN TEMPLE	791	52.91	17.77	2.08	19.61	9.86	22.23	25.68	40.40	62.39	4.84	6.96	4.21	5.03	8.11	
EXTRACO WACO	664	44.41	22.15	3.07	17.05	15.18	21.79	21.47	39.01	60.28	9.11	4.39	8.74	9.94	12.91	
Limited Review:																
EXTRACO HAMILTON COUNTY	40	2.68	24.14	5.00	18.16	10.00	21.38	22.50	36.32	62.50	40.82	50.00	42.86	55.55	41.94	

* Based on 2001 Peer Mortgage Data: Southwest Region.

** As a percentage of loans with borrower income information available. No information was available for 2.14% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 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.

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Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: E BK&MTG HMDA					Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					Market Share [*]				
MA/Assessment Area:	Total Home Improvement 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:																
EXTRACO KILEEN TEMPLE	137	56.38	17.77	5.97	19.61	5.22	22.23	16.42	40.40	72.39	11.90	13.64	5.19	10.40	15.30	
EXTRACO WACO	100	41.15	22.15	5.32	17.05	10.64	21.79	13.83	39.01	70.21	8.69	10.26	6.07	7.79	8.30	
Limited Review:																
EXTRACO HAMILTON COUNTY	6	2.47	24.14	0.00	18.16	0.00	21.38	0.00	36.32	100.00	28.57	0.00	0.00	0.00	40.00	

* Based on 2001 Peer Mortgage Data: Southwest Region.

** As a percentage of loans with borrower income information available. No information was available for 4.12% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 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.

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Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: E BK&MTG HMDA				Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002					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:																
EXTRACO KILEEN TEMPLE	621	48.40	17.77	0.53	19.61	6.60	22.23	14.26	40.40	78.61	5.90	0.00	8.43	5.97	13.39	
EXTRACO WACO	637	49.65	22.15	2.48	17.05	10.10	21.79	22.35	39.01	65.07	12.45	10.64	12.50	17.15	15.62	
Limited Review:																
EXTRACO HAMILTON COUNTY	25	1.95	24.14	4.35	18.16	8.70	21.38	26.09	36.32	60.87	30.48	50.00	42.86	44.44	41.93	

* Based on 2001 Peer Mortgage Data: Southwest Region.

** As a percentage of loans with borrower income information available. No information was available for 7.40% of loans originated and purchased by BANK.

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

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

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Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: E BK&MTG HMDA			Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
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 ⁷	
	#	% 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:									
EXTRACO KILEEN TEMPLE	718	59.88	74.86	69.92	77.44	14.62	7.94	9.21	16.32
EXTRACO WACO	397	33.11	70.15	62.22	78.84	13.35	7.81	5.37	8.28
Limited Review:									
EXTRACO HAMILTON COUNTY	84	7.01	70.72	71.43	89.29	5.95	4.76	28.66	51.35

* Based on 2001 Peer Small Business Data: US&PR.

** 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).

**** 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 10.84% of small loans to businesses originated and purchased by the bank.

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Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: E BK&MTG HMDA			Evaluation Period: JANUARY 1, 2001 TO DECEMBER 31, 2002				
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 ⁷	
	#	% 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:									
EXTRACO KILEEN TEMPLE	104	49.76	93.00	97.12	92.31	4.81	2.88	41.01	48.31
EXTRACO WACO	41	19.62	95.35	95.12	82.93	12.20	4.88	25.88	33.85
Limited Review:									
EXTRACO HAMILTON COUNTY	64	30.62	91.30	87.50	100.00	0.00	0.00	91.49	97.44

* Based on 2001 Peer Small Business Data: US&PR.

** 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).

**** 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 5.74% of small loans to farms originated and purchased by the bank.

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Table 13. Qualified Investments

QUALIFIED INVESTMENTS		Geography: E BK HMDA CRA0102				Evaluation Period: October 3, 2000 TO October 27, 2003			
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:									
EXTRACO KILEEN TEMPLE	1	1,000	5	6	6	1,006	42.79	0	0
EXTRACO WACO	0	0	11	1,342	11	1,342	57.08	1	7
Limited Review:									
EXTRACO HAMILTON COUNTY	0	0	1	3	1	3	0.13	0	0

* 'Prior Period Investments' means investments made in a previous evaluation 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.

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Table 14. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: E BK HMDA CRA0102				Evaluation Period: October 3, 2000 TO October 27, 2003									
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:																	
EXTRACO KILEEN TEMPLE	72.68	8	61.50	0.00	25.00	37.50	37.50	1	0	0	+1	0	0	0.14	22.38	50.35	27.13
EXTRACO WACO	21.52	4	30.80	0.00	0.00	50.00	50.00	0	0	0	0	0	0	9.60	26.07	34.64	29.28
Limited Review:																	
EXTRACO HAMILTON COUNTY	5.80	1	7.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00

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Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM				Geography: E BK HMDA CRA0102				Evaluation Period: October 3, 2000 TO October 27, 2003									
MA/Assessment Area:	Deposits	Branches				ATMs				Population							
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of ATMs	% of Total Bank ATMs	% Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
EXTRACO KILEEN TEMPLE	72.68	8	61.50	0.00	25.00	37.50	37.50	15	79.00	7.00	27.00	33.00	33.00	0.14	22.38	50.35	27.13
EXTRACO WACO	21.52	4	30.80	0.00	0.00	50.00	50.00	4	21.00	0	0	50.00	50.00	9.60	26.07	34.64	29.28
Limited Review:																	
EXTRACO HAMILTON COUNTY	5.80	1	7.70	0.00	0.00	100.00	0.00	0	0.00	0	0	0	0	0.00	0.00	100.00	0.00