



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

Public Disclosure

September 7, 2004

Community Reinvestment Act  
**Performance Evaluation**

**The National Bank of Walton County  
Charter Number: 14046**

**140 E. Washington Street  
Monroe, GA 30655**

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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 **The National Bank of Walton County (NBWC)** with respect to the lending, investment, and service tests:

Performance Levels	The National Bank of Walton County (NBWC) Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

\* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Overall, NBWC's lending activity reflects a good responsiveness in meeting the credit needs of the AA.
- NBWC's geographic distribution of loans is excellent. By individual loan products, NBWC's distribution of HMDA, small business, and farm loans is excellent.
- Overall, NBWC's distribution of loans by income level of the borrower is excellent. NBWC's distribution of HMDA loans is excellent. NBWC's distribution of small loans to businesses is excellent. NBWC's distribution of small loans to farms is good.
- NBWC's level of community development investments is adequate.
- NBWC's retail delivery systems are accessible to geographies and individuals of different income levels in its AA.
- NBWC's level of community development services is good.

## 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 applications, 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

The National Bank of Walton County (NBWC) is a \$240 million intrastate bank headquartered in Monroe, Georgia. NBWC's AA includes Walton County in its entirety and two census tracts in Gwinnett County. Both Walton and Gwinnett counties are part of the Atlanta MSA. NBWC operates 3 banking offices and 2 ATMs throughout the AA. The AA is comprised of 10 census tracts, none of which are designated as low-income, 6 are moderate-income, 3 are middle-income and 1 is upper-income according to the 1990 census information.

NBWC is a wholly owned subsidiary of Synovus Financial Corp. based in Columbus, Georgia. Synovus (NYSE symbol: "SNV") is a diversified financial services holding company with more than \$22 billion in assets. Synovus provides integrated financial services including banking, financial management, insurance, mortgage and leasing services through 40 affiliate banks and other Synovus offices in Georgia, Alabama, South Carolina, Florida and Tennessee; and electronic payment processing through an 81-percent stake in TSYS (NYSE symbol: "TSS"), the world's largest third-party processor of international payments.

NBWC does not operate any subsidiaries. However, at their request, the home mortgage lending activity of Synovus Mortgage Company (an affiliate of NBWC) is included in this Performance Evaluation.

As of June 30, 2004, loans totaled \$178 million and deposits totaled \$193 million. Loans represent 74 percent of total assets. The distribution of NBWC's loan portfolio was as follows: commercial (includes commercial real estate) (69.15 percent); 1-4 family residential properties (22.99 percent); consumer loans (5.74 percent), agricultural (0.89 percent), and other loans (1.23 percent). As illustrated by the loan mix, NBWC is primarily a commercial lender followed by a residential mortgage lender. Small farm lending is not a significant product for the bank. NBWC's Tier One Capital is \$17 million and their risk based capital to risk weighted assets equals 10.37 percent. Tier One Leverage Capital equaled 7.05 percent.

NBWC is the dominant financial institution in Walton County with a deposit market share of 32.59 percent. There are six financial institutions with banking offices that operate in this county. These institutions are primarily small community banks and one large regional company. When Gwinnett and Walton Counties are combined, NBWC's market share drops to 2.67 percent and their market rank drops to number 11. The dominant institutions are large regional and multi-national companies such as Wachovia, Bank of America, SunTrust, SouthTrust and Branch Banking and Trust Company and a smaller community bank – Brand Banking and Trust Company.

There are no legal, financial or other factors impeding NBWC's ability to help meet the credit needs in its assessment area (AA). NBWC's CRA performance was rated "Satisfactory" in the previous public evaluation dated September 27, 1999.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the lending, investment and service tests. In evaluating NBWC's lending performance, we reviewed residential mortgage loans and small loans to businesses and farms. The HMDA lending activity for the mortgage company during this evaluation period is also included in this PE.

The evaluation period for home mortgage, small business and farm loans is January 1, 1999, through December 31, 2002. For CD loans, the investment test and the services test, the evaluation period is September 28, 1999, through September 7, 2004.

### Data Integrity

Prior to our previous CRA examination, we performed a data verification review. NBWC's home mortgage loans and loans to small businesses and farms loan data was tested for accuracy. We determined that NBWC's data was accurate. Also, we reviewed NBWC's data collection, verification and reporting processes to ensure that they were adequate.

During this evaluation, we reviewed NBWC's processes and concluded that no major changes had occurred. Therefore, this evaluation is based on accurate data.

CD loans, investments and services submitted by management were verified to ensure that they met the regulatory definition for CD. Some items submitted by NBWC were excluded from this evaluation because they did not meet the definition of CD.

### Selection of Areas for Full-Scope Review

NBWC has one AA, the Atlanta MSA. This AA received a full-scope review. Refer to the table in Appendix A for more information.

### Ratings

NBWC's overall rating is based primarily on its performance in the Atlanta MSA AA.

By loan products, small loans to businesses and HMDA loans received equal weight. Small farm loans received the least weight of the three products. NBWC is not a significant small farm lender. Multi-family loans were not analyzed. NBWC originated a nominal number of multi-family loans during this evaluation period; therefore an analysis would be meaningless. In terms of home mortgage loan products, refinance loans received more weight than home purchase or home improvement loans. This weighting is reflective of NBWC's lending performance during the evaluation period and its overall lending strategy.

## **Other**

In conjunction with this CRA examination, we contacted one community development organization to determine the credit needs of the community. The type of organization contacted was an affordable housing organization. The needs identified by this organization included affordable housing for low- and moderate-income families including 1-4 family and rental units. The contact indicated that there is a significant need for affordable housing in the area because land prices have escalated and have therefore driven up housing costs. Outside of Habitat for Humanity, there are no non-profits working in this market area providing affordable housing. For this reason, financial institutions can assist by providing their own affordable housing product as well as assistance in providing financial literacy to the residents.

The opportunity to make community development loans, investments or provide community development services in the AA is limited. There are no Community Development Corporations (CDCs) or Community Development Financial Institutions (CDFIs) that operate in NBWC's AA. We did identify one statewide housing agency, a local non-profit housing agency and a few grassroots organizations that operate in NBWC's AA.

## **Fair Lending Review**

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

## Conclusions with Respect to Performance Tests

### LENDING TEST

#### Conclusions for Areas Receiving Full-Scope Reviews

NBWC's performance under the lending test is rated "Outstanding." Based on full-scope reviews, NBWC's performance in the AA is excellent.

#### Lending Activity

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

Overall, NBWC's lending activity reflects a good responsiveness to meeting the credit needs of the AA. This assessment is based on NBWC's market share in the AA by individual products compared to their deposit market share. We also considered number of competitors in the AA in determining the level of lending activity.

Based on June 30, 2003, FDIC deposit market information, NBWC ranks number 11th in the AA with a 2.67 percent deposit market share. The dominant institutions are large regional and multi-national companies. The top six institutions in this market have a combined market share of 61.22 percent and a total of 105 banking offices in the area. There are 37 institutions that operate in this area with a total of 177 banking offices.

In terms of small loans to businesses, NBWC ranks number 16 in the AA with a market share of 1.12 percent. There are 119 lenders in the AA making small loans to businesses. NBWC is ranked number 9 in the AA in HMDA loans with a market share of 2.50 percent. The number 1 ranked institution has a market share of 8 percent. There are 320 lenders making HMDA loans in this AA. NBWC ranked number 612 in making small loans to farms with a market share of 0.01 percent. There were 1,033 institutions making small loans to farms in the AA.

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

Overall, NBWC's geographic distribution of loans is excellent. By loan products, the distribution of HMDA, small loans to businesses, and small loans to farms is excellent.

#### *Home Mortgage Loans*

NBWC's geographic distribution of HMDA loans is excellent.

NBWC's AA does not have any low-income census tracts. By individual HMDA loan products, NBWC's home purchase, home improvement and refinance lending performance is strong. NBWC's geographic distribution of *home purchase* loans is excellent. In moderate-income tracts, NBWC's percentage of loans significantly exceeds the percentage of owner-occupied units in these tracts. Furthermore, NBWC's home purchase market share in moderate-income tracts significantly exceeds their overall market share of lending in all census tracts.

NBWC's geographic distribution of *home improvement* loans is excellent. In moderate-income tracts, NBWC's percentage of loans significantly exceeds the percentage of owner-occupied units in these tracts. Furthermore, NBWC's home improvement market share in moderate-income tracts significantly exceeds their overall market share of lending in all census tracts.

NBWC's geographic distribution of *refinance* loans is excellent. In moderate-income tracts, NBWC's percentage of loans significantly exceeds the percentage of owner-occupied units in these tracts. Furthermore, NBWC's refinance market share in moderate-income tracts significantly exceeds their overall market share of lending in all census tracts.

### ***Small Loans to Businesses***

NBWC's geographic distribution of small loans to businesses is excellent. NBWC's percentage of loans in moderate-income tracts significantly exceeds the percentage of businesses located in these geographies. Also, NBWC's market share in moderate-income tracts significantly exceeds their small loans to businesses market share in all tracts.

### ***Small Loans to Farms***

NBWC's geographic distribution of small loans to farms is excellent. NBWC's percentage of loans in moderate-income tracts significantly exceeds the percentage of farms located in these geographies. Also, NBWC's small loans to farms market share significantly exceed its overall market share of loans in all tracts.

### **Lending Gap Analysis**

We evaluated NBWC's lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We reviewed lending reports detailing the volume of home mortgage, small loans to businesses and small loans to farms in the AA. No unexplained conspicuous gaps were identified. NBWC made home mortgage and small loans to businesses in all census tracts in its AA.

### ***Inside/Outside Ratio***

Overall, a high percentage of NBWC's loans were made inside the bank's AA. Approximately, 83 percent of NBWC's total lending activity during this evaluation period was made inside the AA. By individual loan product, 87 percent of HMDA loans, 82 percent of small loans to businesses, and 73 percent of small loans to farms were inside NBWC's AA. This assessment was made on the entire bank rather than by AA and does not include any of the lending activity of the mortgage company.

## Distribution of Loans by Income Level of the Borrower

Overall NBWC's distribution of loans by income level of the borrower is excellent. NBWC's distribution of HMDA loans is excellent. The distribution of small loans to businesses is excellent. NBWC's distribution of small loans to farms is good.

### *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.

Overall, the distribution of home mortgage loans by income level of the borrower is excellent.

NBWC's distribution of *home purchase loans* is good. NBWC's percentage of home purchase loans to low-income individuals is near the demographic information reflecting the percentage of families in the AA that are low-income. NBWC's percentage of home purchase loans to moderate-income individuals is also near the demographic information reflecting the percentage of moderate-income families residing in the AA.

When NBWC's performance is considered in light of the percentage of the families in the AA that live below the poverty level, the bank's performance is strong. Approximately 8.35 percent of the families in the AA live below the poverty level, which means that 36.60 percent of the low-income families live below the poverty level.

In comparing NBWC's market share to low- and moderate-income individuals to the overall market, their performance is good. NBWC's market share to low-income individuals significantly exceeds its overall market share of loans to all individuals. NBWC's market share to moderate-income individuals is near its overall market share of loans to all individuals.

NBWC's distribution of *home improvement loans* is excellent. NBWC's percentage of home improvement loans to low-income individuals is near the percentage of families in the AA that are low-income. NBWC's percentage of home improvement loans to moderate-income individuals exceeds the percentage of families in the AA that are moderate-income. When the demographic information is factored into the bank's lending performance, NBWC's performance is strong. Refer to the comments under home purchase lending for a discussion on the factors affecting the bank's lending performance.

NBWC's home improvement market share to low-income individuals is near its overall market share of home improvement loans to all individuals. NBWC's market share of loans to moderate-income individuals significantly exceeds its overall market share of loans to all individuals.

NBWC's distribution of *refinance loans* is excellent. NBWC's percentage of refinance loans to low-income individuals is somewhat lower than the percentage of families in the AA that are low-income. NBWC's percentage of refinance loans to moderate-income individuals exceeds the percentage of moderate-income families that reside in the AA. When the high percentage of families living below the poverty level is considered, NBWC's lending performance to low-income borrowers is good.

NBWC's refinance market share to low-income individuals significantly exceeds its overall refinance market share to all individuals. NBWC's market share to moderate-income individuals also exceeds its overall market share to all individuals.

### ***Small Loans to Businesses***

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

Overall, NBWC's distribution of small loans to businesses is excellent. NBWC's percentage of loans to small businesses (businesses with revenues less than \$1 million) significantly exceeds the percentage of small businesses that operate in the AA. Furthermore, NBWC's market share of loans to small businesses significantly exceeds its market share of loans to all businesses. Lastly, during this evaluation period, a significant portion of NBWC's business loans was for amounts less than \$100 thousand. This illustrates NBWC's efforts to meet the lending needs of the businesses in the AA for small loans.

### ***Small Loans to Farms***

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

NBWC's distribution of small loans to farms is good. NBWC's percentage of loans to small farms (farms with revenues less than \$500 thousand) is near the percentage of small farms that operate in the AA. NBWC's market share of loans to small farms is near its overall market share of loans to all farms. Also, a large percentage of the loans made during this evaluation period were small dollar loans indicating that NBWC is committed to meeting the small loans needs of the farms in the AA.

### **Community Development Lending**

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate NBWC's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

During this evaluation period, NBWC made two CD loans totaling \$231 thousand. This amount represents 1.38 percent of Tier One capital. Both loans were made to the Georgia Affordable Housing Partnership. This organization provides affordable housing for low- and moderate-income individuals throughout the state of Georgia. The loan proceeds were used to renovate and/or construct two multi-family apartment complexes with a total of 248 units. The loans are secured by low income housing tax credits.

These loans were not considered innovative in nature but did address an identified credit need in the community, affordable housing. While the loans did not have a direct impact on the bank's AA, the organization's focus is on a broader regional area that includes NBWC's AA; therefore, the loans qualify as a CD loan. NBWC's level of CD lending had a neutral impact on the lending test rating.

## **Product Innovation and Flexibility**

NBWC did not use any innovative or flexible products during this evaluation period. This had a neutral impact on the lending test rating.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

NBWC's performance under the investment test is rated "Low Satisfactory." Based on full-scope reviews, the bank's performance in the Atlanta MSA AA is adequate.

Refer to Table 14 in Appendix C for the facts and data used to evaluate NBWC's level of qualified investments.

NBWC's level of community development investments is adequate. During this evaluation period, NBWC made 31 qualified investments totaling \$27 thousand. This represents 0.16 percent of Tier One capital. Based on the dollar amount of investments coupled with the limited investment opportunities in the AA, this level is considered adequate.

Of the investment total, \$21 thousand is comprised of grants/donations to community development organizations that provide community services to low- and moderate-income individuals, affordable housing for low- and moderate-income individuals or that revitalize low- or moderate-income areas. The remaining \$6 thousand is an investment in a SBIC fund. NBWC has an outstanding commitment of \$244 thousand to this fund.

All investments were made in the AA. Also, all investments were made during this evaluation period. There was no prior period investments submitted to us for consideration. These investments were not considered innovative or complex in nature but did meet the identified needs of the AA.

## **SERVICE TEST**

### **Conclusions for Areas Receiving Full-Scope Reviews**

NBWC's performance under the Service Test is rated "High Satisfactory." Based on full-scope reviews, the bank's performance in the Atlanta MSA AA is good.

### **Retail Banking Services**

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

NBWC's retail delivery systems are accessible to geographies and individuals of different income levels in its AA.

NBWC operates three banking offices. Two (67 percent) of the offices are located in a moderate-income census tract and one (33 percent) is located in a middle-income tract. NBWC's percentage of banking offices in the moderate-income tracts significantly exceeds demographic information that shows that 44 percent of the population in the AA resides in those tracts.

NBWC did not open or close any branches during this evaluation period. As a result, NBWC's record of opening and/or closing branches is good. NBWC's record has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

Banking hours and services do not vary from one location to another. With the exception of the main office, all banking offices are opened on Saturday with full lobby services except the main office. NBWC offers a wide range of banking products and services.

### **Community Development Services**

NBWC's level of community development services is good based on the limited opportunities in the AA and number of organizations that benefited from the services provided. Three bank employees provided financial services to seven community development organizations. The types of activities provided included serving as president, on the executive committee, fundraising chairman or as a member of organizations that provided community services to low- and moderate-income individuals, provided affordable housing for low- and moderate-income individuals, revitalized or stabilized low- or moderate-income areas, or provided economic development by financing small business loans.

## 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”).

<b>Time Period Reviewed</b>	Lending Test (excludes CD Loans): (01/01/1999 to 12/31/2002) Investment and Service Tests and CD Loans: (09/28/1999 to 09/07/2004)	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
The National Bank of Walton County (NBWC) Monroe, Georgia	HMDA, small loans to businesses, small loans to farms and CD loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Synovus Mortgage Company	Affiliate	Home Mortgage Loans
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Atlanta MSA AA	Full-Scope	

# Appendix B: Market Profiles for Full-Scope Areas

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### Market Profiles for Areas Receiving Full-Scope Reviews

Atlanta MSA AA .....	B-2
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## Atlanta MSA AA

Demographic Information for Full Scope Area: Atlanta MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	10	0.00	60.00	30.00	10.00	0.00
Population by Geography	52,438	0.00	44.04	42.16	13.80	0.00
Owner-Occupied Housing by Geography	13,557	0.00	38.28	45.63	16.10	0.00
Business by Geography	5,262	0.00	31.62	50.86	17.52	0.00
Farms by Geography	209	0.00	33.97	55.98	10.05	0.00
Family Distribution by Income Level	14,749	22.80	22.00	24.06	31.14	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	6,608	0.00	55.78	37.91	6.31	0.00
Median Family Income		41,047	Median Housing Value		75,338	
HUD Adjusted Median Family Income for 2002		71,200	Unemployment Rate (1990 US Census)		2.27%	
Households Below Poverty Level		12.58%				

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

Source: 1990 US Census and 2002 HUD updated MFI

NBWC's AA consists of Walton County in its entirety and two census tracts in Gwinnett County. Both Walton and Gwinnett Counties are included in the Atlanta MSA. The AA meets the requirements of the regulation and does not arbitrarily exclude any areas particularly low- or moderate-income neighborhoods. NBWC operates three banking offices and two ATMs in Walton County. The main office and one branch are located in Monroe, GA. The other branch is located in Loganville, GA approximately 10 miles away. The Loganville branch is located less than 1 mile from the Gwinnett County line.

In terms of deposit market share, NBWC is ranked number 11<sup>th</sup> in the AA with a deposit market share of 2.67 percent. There are 37 financial institutions in the AA with 177 banking offices. The dominant financial institutions in the area include large regional and multi-national companies. Competition in the AA is very strong for mortgage and small business loans.

Walton County is located about 45 miles east of Atlanta and 20 miles west of Athens. Eastern Walton County is primarily rural. Western Walton County is experiencing rapid development, primarily residential, largely because of the county's proximity to the Atlanta metropolitan area. Gwinnett County is a rapidly growing suburban community in the northeastern portion of the Atlanta metropolitan area. Since 1970, Gwinnett has been one of the fastest growing counties in the nation. As a result of the rapid growth in the AA, housing costs have increased making it more and more difficult for low- and moderate-income individuals to afford a home.

The economy in the AA is diversified. The economy is supported by construction, services, retail, government, and manufacturing jobs. The labor trend since 1990 has been a shift from the manufacturing sector and other blue collar associated jobs, to the service sector. This trend is mirrored on the state, as well as national level.

Major employers in the county include Wal-Mart Distribution Center (distribution center) with 551 employees, Standridge Color Corporation (color concentrate) with 344 employees and Leggett & Platt, Inc. (mattress manufacturer) with 296 employees. The unemployment rate is relatively low compared to the rest of the state. As of July 2004, the unemployment rates for Walton and Gwinnett Counties were 4.2 and 3.5 percent, respectively, compared to the state average of 4.4 percent.

## Appendix C: Tables of Performance Data

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### 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. When such loans 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 “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- 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. 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 assessment area.
- 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. 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 assessment area.
- 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 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.

**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. 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 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 1. Lending Volume**

LENDING VOLUME												
Geography: GEORGIA												
Evaluation Period: JANUARY 01, 1991 TO DECEMBER 31, 2002												
MA/Assessment Area (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)	
<b>Full Review:</b>												
Atlanta MSA AA	100.00	945	89,905	967	93,757	77	5,481	2	231	1991	189,374	100.00

**Table2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE															
Geography: GEORGIA															
Evaluation Period: JANUARY 01, 1991 TO DECEMBER 31, 2002															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta MSA AA	156	100.00	0.00	0.00	38.28	69.87	45.63	28.85	16.10	1.28	0.90	0.00	3.26	0.47	0.00

\* 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 June 30, 1999 to June 30, 2004.

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

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

\*\* 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.

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: GEORGIA				Evaluation Period: JANUARY 01, 9991 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					
<b>Full Review:</b>															
Atlanta MSA AA	127	100.00	0.00	0.00	38.28	86.61	45.63	11.81	16.10	1.57	10.03	0.00	25.71	1.47	0.00

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: GEORGIA				Evaluation Period: JANUARY 01, 9991 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					
<b>Full Review:</b>															
Atlanta MSA AA	651	100.00	0.00	0.00	38.28	78.96	45.63	20.74	16.10	0.31	3.26	0.00	10.92	1.16	0.00

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

\*\* 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.

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

\*\* 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.

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: GEORGIA					Evaluation Period: JANUARY 01, 1991 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						
<b>Full Review:</b>																
Atlanta MSA AA	11	100.00	0.00	0.00	90.68	72.73	9.32	27.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: GEORGIA					Evaluation Period: JANUARY 01, 1991 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						
<b>Full Review:</b>																
Atlanta MSA AA	967	100.00	0.00	0.00	31.62	56.98	50.86	41.37	17.52	1.65	1.12	0.00	8.83	0.98	0.12	

\* Based on 2002 Peer Mortgage Data: Southeast Region 1.

\*\* 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.

\* Based on 2002 Peer Small Business Data: US and 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 (2003).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: GEORGIA					Evaluation Period: JANUARY 01, 1991 TO DECEMBER 31, 2002					Market Share (%) by Geography <sup>*</sup>				
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 <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans	% of Farms <sup>**</sup>	% BANK Loans	% of Farms <sup>**</sup>	% BANK Loans	% of Farms <sup>**</sup>	% BANK Loans						
<b>Full Review:</b>																
Atlanta MSA AA	77	100.00	0.00	0.00	33.97	84.42	55.98	15.58	10.05	0.00	35.85	0.00	53.33	18.75	0.00	

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: GEORGIA					Evaluation Period: JANUARY 01, 1991 TO DECEMBER 31, 2002					Market Share <sup>*</sup>				
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 <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Full Review:</b>																
Atlanta MSA AA	156	100.00	22.80	21.85	22.00	21.19	24.06	23.18	31.14	33.77	1.04	2.41	0.73	1.03	0.70	

<sup>\*</sup> Based on 2002 Peer Small Business Data: US and PR.

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> Source Data - Dun and Bradstreet (2003).

<sup>\*</sup> Based on 2002 Peer Mortgage Data: Southeast Region 1.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 3.21% of loans originated and purchased by BANK.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information.

<sup>\*\*\*\*</sup> 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 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: GEORGIA				Evaluation Period: JANUARY 01, 9991 TO DECEMBER 31, 2002					Market Share <sup>*</sup>				
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 <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>					
<b>Full Review:</b>															
Atlanta MSA AA	127	100.00	22.80	22.13	22.00	25.41	24.06	29.51	31.14	22.95	10.26	8.00	18.18	7.32	8.00

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: GEORGIA				Evaluation Period: JANUARY 01, 9991 TO DECEMBER 31, 2002					Market Share <sup>*</sup>				
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 <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>					
<b>Full Review:</b>															
Atlanta MSA AA	651	100.00	22.80	14.89	22.00	25.08	24.06	30.56	31.14	29.47	4.14	7.31	4.15	3.15	4.06

<sup>\*</sup> Based on 2002 Peer Mortgage Data: Southeast Region 1.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 3.94% of loans originated and purchased by BANK.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information.

<sup>\*\*\*\*</sup> 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.

<sup>\*</sup> Based on 2002 Peer Mortgage Data: Southeast Region 1.

<sup>\*\*</sup> As a percentage of loans with borrower income information available. No information was available for 2.00% of loans originated and purchased by BANK.

<sup>\*\*\*</sup> Percentage of Families is based on the 1990 Census information.

<sup>\*\*\*\*</sup> 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.

**Table11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: GEORGIA			Evaluation Period: JANUARY 01, 9991 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 <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Businesses <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Atlanta MSA AA	967	100.00	65.62	82.63	76.22	12.82	10.96	1.12	3.23

**Table12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: GEORGIA			Evaluation Period: JANUARY 01, 9991 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 <sup>*</sup>	
	#	% of Total <sup>**</sup>	% of Farms <sup>***</sup>	% BANK Loans <sup>****</sup>	\$100,000 or less	> \$100,000 to \$250,000	> \$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Atlanta MSA AA	77	100.00	94.74	92.21	79.22	15.58	5.19	35.85	35.42

<sup>\*</sup> Based on 2002 Peer Small Business Data: US and PR.

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup> Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2003).

<sup>\*\*\*\*</sup> 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 0.21% of small loans to businesses originated and purchased by the bank.

<sup>\*</sup> Based on 2002 Peer Small Business Data: US and PR.

<sup>\*\*</sup> 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.

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

<sup>\*\*\*\*</sup> 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: GEORGIA									
Evaluation Period: SEPTEMBER 28, 1999 TO SEPTEMBER 7, 2004									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Atlanta MSA AA	0	0	31	27	31	27	100.00	1	244

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		
Geography: GEORGIA																		
Evaluation Period: SEPTEMBER 28, 1999 TO SEPTEMBER 7, 2004																		
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
<b>Full Review:</b>																		
Atlanta MSA AA	100.00	3	100.00	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.00	44.04	42.16	13.80	

\* '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.