

# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## Public Disclosure

July 24, 2000

## Community Reinvestment Act Performance Evaluation

First National Bank of Jasper  
Charter Number: 7746

P. O. Box 31  
200 W. 18<sup>th</sup> Street  
Jasper, Alabama 35502

Office of the Comptroller of the Currency

830 Morris Turnpike, 2<sup>nd</sup> Floor  
Short Hill, New Jersey 07078-2600

**NOTE:** 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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## General Information

*The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.*

*This document is an evaluation of the CRA performance of **First National Bank of Jasper** prepared by the **Office of the Comptroller of the Currency (OCC)**, the institution's supervisory agency, as of **July 24, 2000**. The agency evaluates performance in assessment area(s), as they are delineated by the institution, rather than individual branches. This assessment area evaluation may include the visits to some, but not necessarily all of the institution's branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.*

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation. 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 by another company. A company is under common control with another company if both companies are directly or indirectly controlled by the same company. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Block Numbering Area (BNA)** - Statistical subdivisions of counties in which census tracts have not been established. BNAs have been established by the United States Census Bureau in conjunction with state agencies.

**Census Tract (CT)** - Small, locally defined statistical areas within metropolitan statistical areas. These areas are determined by the United States Census Bureau in an attempt to group homogenous populations. A CT has defined boundaries per ten year census and an average population of 4,000.

**Community Development (CD)** - Affordable 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 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.

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

**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 statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, and the disposition of the application (e.g., approved, denied, withdrawn).

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

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

**Low-Income** - Income levels that are less than 50% of the median family income.

**Median Family Income (MFI)** - The median income determined by the United States 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 Statistical Area (MSA)** - Area defined by the Director of the United States Office of Management and Budget. MSAs consist of one or more counties, including large population centers and nearby communities that have a high degree of interaction.

**Middle-Income** - Income levels that are at least 80% and less than 120% of the MFI.

**Moderate-Income** - Income levels that are at least 50% and less than 80% of the MFI.

**Small Business Loans** - Loans with original amounts of \$1 million or less that are: (1) secured by nonfarm nonresidential properties; or (2) commercial and industrial loans to U.S. addresses.

**Small Farm Loans** - Loans with original amounts of \$500 thousand or less that are: (1) secured by farmland; or (2) to finance agricultural production and other loans to farmers.

**Tier 1 Capital** - The total of common shareholders' equity, perpetual preferred shareholder's equity with noncumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income** - Income levels that are 120% or more of the MFI.

## Overall CRA Rating

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

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

Performance Levels	First National Bank of Jasper Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

\* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- Overall, FNB's distribution by borrower income is good. FNB's small loans to businesses and farms by income level are excellent. The bank's distribution of home mortgage loans by income level of the borrower is good.
- FNB's community development lending had a positive impact on the lending test conclusions in its AA.
- FNB has made an adequate level of qualified community development investments given its size, capacity and available opportunities in its AA.
- FNB's delivery systems are accessible to geographies and individuals of different income levels in its AA.
- FNB's performance in providing community development services is good.



## Description of Institution

First National Bank of Jasper (FNB) is a \$475 million intrastate bank located in Jasper, Alabama, approximately 50 miles northwest of Birmingham. FNB is a wholly owned subsidiary of Synovus Financial Corp. headquartered in Columbus, Georgia. As of December 31, 1999, Synovus reported total assets of \$12.5 billion. Synovus owns 39 banks serving communities throughout Georgia, Alabama, Florida, and South Carolina. FNB has no subsidiaries. There has been no merger or acquisition activity since the last CRA evaluation.

FNB is a full-service lender offering various loan and deposit products. FNB offers VA, FHA, and conventional home mortgage loans, home improvement loans, home equity loans and a full range of business loans. The percentage of total assets represented by net loans is 75%. As of June 30, 2000, the composition of the bank's \$367 million loan portfolio consists of commercial loans (44%), real estate loans (24%), consumer (16%) and other loans (16%).

While the bank offers a full range of loan products, FNB's primary business focus is small business lending.

There are no legal, financial or other factors impeding FNB's ability to help meet the credit needs of the communities it serves. As of June 30, 2000, FNB reported Tier 1 capital of \$34 million.

FNB's performance was rated "Satisfactory" at its last CRA evaluation dated February 3, 1998.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

With the exception of community development (CD) loans, the evaluation period for the Lending Test is January 1, 1998 through December 31, 1999. For CD loans, the Investment Test, and the Service Test, the evaluation period is September 30, 1997 to July 24, 2000. This evaluation period runs from the ending date of the last CRA evaluation period to the start date of the CRA Data Analysis Phase.

For the Lending Test, FNB's origination/purchase of home mortgage loans, small loans to businesses and farms and community development (CD) loans were evaluated.

### **Data Integrity**

As part of this CRA evaluation, FNB's publicly filed information on small business and small farm loans was tested for accuracy. FNB is not a HMDA reportable bank, but optionally collected home mortgage loan data to be considered in this evaluation. This data was also tested for accuracy. The test included an evaluation of FNB's processes to ensure that the data was reliable.

No significant errors were found in the bank's reported small loans to businesses/farms and home mortgage loan data. As a result, this evaluation is based on accurate data.

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

### **Selection of Areas for Full-Scope Review**

FNB's entire assessment area, Walker County, Alabama was selected for full-scope review.

### **Ratings**

The bank's overall rating is based primarily on those areas that received a full-scope review. When determining conclusions for the Lending Test, more weight

was given to small loans to businesses and farms. These products make up the majority of the bank's lending volume and small business lending is FNB's primary business focus. In addition, the need for small business start-up financing was identified as a need in the bank's AA. All home mortgage products received equal weight as affordable and decent housing was identified as credit needs in the bank's AA during this evaluation. Refinanced loans are FNB's major home mortgage product and make up the majority of home mortgage lending.

### **Other**

Two community contacts were made during this evaluation. The contacts included the local Chamber of Commerce and Housing Authority. One of the contacts identified affordable and decent housing and credit counseling as the primary credit needs in the bank's AA. Another contact stated that there is a need for small business start-up financing. The needs for affordable and decent housing and small business financing were considered in our evaluation of the FNB's performance under the Lending, Investment and Service Tests. Refer to the Market Profile in Appendix B of this Evaluation for more information.

## **Fair Lending Review**

An analysis of 1999 home mortgage, small business and small farm lending data, public comments, and consumer complaint information was performed according to the OCC's risk based fair lending approach. The analysis of this data revealed no basis for the OCC to conduct a comprehensive fair lending examination in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in 1998. No violations of the substantive provisions of the antidiscrimination laws and regulations were identified.

## **Conclusions with Respect to Performance Tests**

### **LENDING TEST**

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

The bank's performance under the Lending Test is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Walker County, Alabama AA is good.

#### **Lending Activity**

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

In the full scope AA, approximately 61% of the loans originated/purchased during the evaluation period were small business loans, with home mortgage loans comprising the majority of the remainder. The volume of small farm loans originated/purchased represented 3%. However, agricultural lending is not a primary business line of FNB.

Among home mortgage loan originations/purchases, 43% were home mortgage refinances, 36% were for home purchase, and 21% were for home improvement.

FNB's lending activity is excellent. As of June 30, 1999, FNB dominated Walker County with a deposit market share of 46% and a number one ranking. Based on 1998 small business aggregate data, FNB is ranked number one with a market share of 57%. For small farm loans, FNB is ranked number one with a market share of 79%. FNB is not a HMDA reportable bank, therefore market share and ranking for home mortgage products was not available.

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

There were no low- or moderate-income geographies in the full-scope AA. Therefore, a geographic distribution analysis would not be meaningful.

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

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

purchases

Performance in the AA was adequate based on the bank's in/out ratio and lending gap analysis since other geographic analysis was not meaningful.

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

Refer to Table 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

Performance in the AA was adequate based on the bank's in/out ratio and lending gap analysis since other geographic analysis was not meaningful.

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

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

Performance in the AA was adequate based on the bank's in/out ratio and lending gap analysis since other geographic analysis was not meaningful.

### ***Lending Gap Analysis***

Maps and reports detailing FNB's lending activity over the evaluation period for home mortgage loans and small loans to businesses and farms were reviewed to identify gaps in the geographic distribution of those loans. No unexplained gaps in lending were identified.

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

A substantial majority of the home mortgage loans, small loans to businesses and farms, CD loans originated/purchased by FNB over the evaluation period were in its AA. Eighty-two percent of the bank's home mortgage loans, 83% of the small loans to business and farms, and 100% of the CD loans were made within its AA.

### **Distribution of Loans by Income Level of the Borrower**

The overall borrower distribution of loans in the AA receiving a full-scope review is good. The borrower distribution of small loans to businesses and farms is excellent. The distribution of home mortgage products is good. In the evaluation of FNB's home purchase, home improvement and refinanced loans in its AA, the

high level of poverty, the high unemployment rate and the need for affordable and decent housing was considered. Refer to the discussion below for each type of home mortgage lending for more information.

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

Refer to Tables 7, 8 and 9 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

Home purchase loan borrower distribution is good. The bank's percentage of home purchase loans made to low-income borrowers is lower than the percentage of families that are defined as such. This can be mitigated by the fact that 70% of low-income families in FNB's AA live below the poverty level. Therefore low-income families have a more difficult time in qualifying for a loan. The bank's percentage of home purchase loans made to moderate-income borrowers is near the percentage of families that are defined as such.

Home improvement loan borrower distribution is excellent. The percentage of home improvement loans made to low-income borrowers equals the percentage of families that are defined as such. The percentage of home improvement loans to moderate-income borrowers equals the percentage of families that are defined as such.

Refinanced loan borrower distribution is adequate. The percentage of refinanced loans made to low-income borrowers is much lower than the percentage of families that are defined as such. This can be mitigated by the fact that a high level of low-income families (70%) live below the poverty level in the bank's AA. As a result, these families will have a difficult time paying closing costs and impact fees associated with refinancing. The percentage of refinanced loans made to moderate-income borrowers is somewhat lower than the percentage of families that are defined as such.

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

Refer to Table 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The borrower distribution of small loans to businesses is excellent in the full-scope AA. The percentage of FNB's small loans to small businesses (businesses with revenues of \$1 million or less) exceeds the percentage of small businesses that are

defined as such. The percentage of loans of \$100,000 or less exceeds the percentage of businesses that are defined as small. In addition, FNB's market share of small loans made to small businesses equals its overall market share in its AA for small loans to all businesses.

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

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

The borrower distribution of small loans to farms is excellent within the full-scope AA. The percentage of FNB's small loans to small farms (farms with revenues of \$1 million or less) exceeds the percentage of farms that are defined as such. The percentage of loans of \$100,000 or less exceeds the percent of farms that are defined as small. In addition, FNB's market share of small loans made to small farms equals its overall market share in the AA for small loans to all farms.

### **Community Development Lending**

Refer to Table 1 in Appendix C for the facts and data used to evaluate the bank's level of community development lending.

CD lending had a positive impact on the Lending Test conclusions in the Walker County, Alabama AA.

During the evaluation period, FNB originated 2 loans totaling \$256,953 in its AA. FNB's lending focused on addressing affordable housing, a primary credit need in the AA. Given the limited capacity among groups operating in the bank's AA to engage in CD lending, particularly in Walker County where the bank is located and which has no low- or moderate-income geographies (refer to Market Profile in Appendix B), the number and dollar amount of CD loans is good. None of the loans are considered complex or innovative. One of the loans was made within a residential depressed area in the bank's AA. In addition, FNB originated other loans with CD characteristics in the AA that were included in the home mortgage lending totals that had a positive impact on the AA. The following is a listing of CD loans:

- ◆ In 1999 FNB made a \$225,000 line of credit to finance the acquisition and renovation of a 16-unit apartment building known as "Marion Garden". The apartments are located in western Jasper in a blighted area. Approximately 50% of the units are government subsidized. The other units are primarily



targeted at low- and moderate-income families. Average monthly rents range from \$100 to \$350.

- ◆ FNB participates in the Alabama Multifamily Loan Consortium. This is a statewide not-for-profit lending consortium to finance affordable multifamily housing throughout the state of Alabama that includes the bank's AA. In 1999, the consortium closed three multifamily loans totaling \$1.2 million. Proceeds of these loans were used to construct 136 rental apartments for low- and moderate-income families. FNB's participation in these 3 loans totaled \$31,953.

### **Product Innovation and Flexibility**

Product innovation and flexibility had a neutral impact on the conclusions for the Walker County, Alabama AA. FNB has not introduced any innovative and flexible loan products during this evaluation period.

## **INVESTMENT TEST**

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

The bank's performance under the Investment Test is rated "Low Satisfactory". Based on a full-scope review, the bank's performance in the Walker County, Alabama AA is adequate given the bank size, capacity and available opportunities.

Refer to Table 12 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

During the evaluation period, FNB made 11 investments totaling \$49,400 thousand. The volume of investments is adequate given the limited CD opportunities in the AA. None of the investments are considered innovative or complex. Although investment opportunities are limited, FNB exhibits adequate responsiveness to whatever CD investments are available.

A discussion of the FNB's investment and donations follows:

FNB made an equity investment of \$1,500 in the Alabama Multifamily Loan Consortium. This statewide not-for-profit lending consortium finances affordable multifamily housing throughout the state of Alabama. The consortium is comprised of 24 financial institutions.

FNB made 10 donations totaling \$47,900 to various projects and community development initiatives throughout its AA. These organizations provide community development services primarily targeted to low- and moderate-income individuals. Because of the limited number of such organizations in the AA, donations were spread among 5 organizations.

## **SERVICE TEST**

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

The bank's performance under the Service Test is rated " High Satisfactory" . Based on a full-scope review, the bank performance in the Walker County, Alabama AA is good.

### **Retail Banking Services**

Refer to Table 13 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

FNB's delivery systems are accessible to different geographies and individuals of different income levels in its AA. There are no low- or moderate-income geographies within the Walker County, Alabama AA. The distribution of branches in middle-income geographies is lower than the distribution of the population living in those geographies. FNB's distribution of branches in upper-income geographies exceeds the distribution of the population living in those geographies. The majority of low- and moderate-income families in the AA live in middle income geographies. FNB's offices in middle-income geographies are near the portion of the population living in such geographies. Branch openings and closing have not affected the accessibility of delivery systems in the full-scope AA.

FNB's hours and services offered throughout the full-scope AA are good. Office hours and services in the bank's AA, including the availability of loan officers for all loan products are comparable among locations regardless of the income level of the geography. Banking hours and services provided Monday through Friday are supplemented by Saturday hours at approximately 90% of the bank's branches. FNB's also utilizes several ATM deposit taking facilities that provide banking services throughout its AA. In evaluating alternative delivery systems, the bank must be able to provide information concerning the impact of the availability of alternative delivery systems in low- and moderate-income geographies and the use of alternative delivery systems by low- and moderate-income individuals. FNB had no information on how low- and moderate-income individuals and geographies are impacted by the service, therefore, significant weight was not placed on the alternative delivery systems when drawing conclusions under the Service Test.

### **Community Development Services**

Based on the number of services provided, FNB's performance in providing CD

services to its full-scope AA is good given the limited available CD opportunities. FNB has targeted their CD service efforts to providing technical assistance, training and fund raising for organizations involved in community development activities. During this evaluation period eight officers of the bank provided technical assistance to six community development organizations within the bank's AA. These organizations provide community development services that primarily targeted low- and moderate-income families in the AA. The services provided were responsive to community development needs.

## 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 nonmetropolitan 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 : January 1, 1998 to December 31, 1999 Investment Test: September 30, 1997 to July 24, 2000 Service Test: September 30, 1997 to July 24, 2000	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
First National Bank of Jasper Jasper, Alabama	Small Loans to Businesses Small Loans to Farms Home Mortgage Loans CD Loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	NA	NA
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
Walker County, Alabama	Full-Scope	

## Appendix B: Market Profiles for Full-Scope Areas

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

Walker County, Alabama .....	B-2
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**Walker County, Alabama**

Demographic Information for Full-Scope Area: Walker County, Alabama						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	19	0%	0%	84%	16%	0%
Population by Geography	67,670	0%	0%	77%	23%	0%
Owner-Occupied Housing by Geography	20,258	0%	0%	77%	23%	0%
Businesses by Geography	2,130	0%	0%	59%	41%	0%
Farms by Geography	50	0%	0%	82%	15%	0%
Family Distribution by Income Level	19,734	20%	18%	19%	43%	0%
Distribution of Low- and Moderate-Income Families throughout AA Geographies	7,531	0%	0%	85%	15%	0%
Median Family Income = \$24,084			Median Housing Value = \$41,673			
HUD Adjusted Median Family Income for 2000 = \$37,100			Unemployment Rate = 6.7%			
Households Below the Poverty Level = 19%						

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 1990 U.S. Census, and 2000 HUD updated MFI.

FNB’s AA includes all of Walker County, Alabama and is comprised of 19 census tracts. Of these, 84% are middle-income and 16% are upper-income. There are no low- and moderate-income census tracts within the bank’s AA. FNB began operations in Jasper 95 years ago. Competition includes the state’s five largest regional companies, four state banks and one savings bank. FNB dominates Walker County with a 46% deposit market share and number one small business lending ranking. The second ranked lender is the largest regional company in the state with a 4% deposit market share.

FNB operates 9 branches and 5 full service ATMs in its AA. There are five branches located in Jasper, which is located approximately 50 miles northwest of Birmingham. Four other branches are located in contiguous nonmetropolitan areas. These include Dora, Cordova, Carbon Hill and Curry.

FNB’s primary business focus is small business lending. The area’s economy has historically been highly dependent on coal. However, over the past several years, most of the coal mines have closed and there has been little growth in industry. The unemployment rate as of May 2000 is 7% compared to the state’s average of 5%.

The primary credit needs identified through community contacts were financing for affordable and decent housing and small business financing. In addition, credit counseling was also identified as a need. Opportunities for FNB to make qualified

investments in the AA are very limited. With the exception of the community development organization previously mentioned in this evaluation, there are no other organized groups or community development corporations that operate in the bank's AA. Opportunities to make CD loans exist but not to a great extent.



## 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; market rank is based on the number of loans originated and purchased by the bank as compared to all other lenders in the MSA/assessment area; 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 MSA/assessment area.

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 MSA/assessment area.
- 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 rank and 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 Refinance Loans** - See Table 2.
- Table 5. 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 rank and market share information based on the most recent aggregate market data available.
- Table 6. 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 rank and market share information based on the most recent aggregate market data available.

- Table 7. 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 MSA/assessment area. The table also presents market rank and market share information based on the most recent aggregate market data available.
- Table 8. Borrower Distribution of Home Improvement Loans** - See Table 7.
- Table 9. Borrower Distribution of Refinance Loans** - See Table 7.
- Table 10. 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small business reporters in the bank's AA to businesses with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 11. 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. The table also compares the banks percentage distribution with the percentage of loans originated and purchased by all other small farm reporters in the bank's AA to farms with revenues of \$1 million or less and is based on the most recent aggregate market data available. 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 12. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MSA/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 have been reported on schedule RC-L of the Call Reports as an off-balance sheet item.
- Table 13. 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 MSA/AA. The table also presents data on branch openings and closings in each MSA/AA.
- Table 14. 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 the population 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 MSA/assessment area.

**Table 1. Lending Volume**

LENDING VOLUME													State: Alabama		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999	
MSA/Assessment Area:	% of Rated Area Deposits in MSA/AA*	Home Mortgage**		Small Loans to Businesses**		Small Loans to Farms**		Community Development***		Total Reported Loans		% of Rated Area Loans(#) in MSA/AA				
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)					
Full-Scope:																
Walker County, Alabama	100%	809	\$43,291	1,397	\$76,534	77	\$2,603	2	\$257	2,285	\$122,685	100%				

(\*) Deposit data as of June 30, 2000.

(\*\*) The evaluation period for Home Mortgage Loans, Small Loans to Businesses and Small Loans to Farms is January 1, 1998 to December 31, 1999.

(\*\*\*) The evaluation period for Community Development Loans is September 30, 1997 to July 24, 2000.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE																	State: Alabama		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Purchase Loans					
	% 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	#	% of Total**				
Full-Scope:																				
Walker County, Alabama	NA	NA	NA	NA	77%	71%	23%	29%	NA	NA	NA	NA	NA	NA	290	100%				

(\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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

Geographic Distribution: HOME IMPROVEMENT																	State: Alabama		Evaluation Period: January 1, 1998 TO December 31, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Improvement Loans					
	% 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	#	% of Total**				
Full-Scope:																				
Walker County, Alabama	NA	NA	NA	NA	77%	79%	23%	21%	NA	NA	NA	NA	NA	NA	173	100%				

(\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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

Geographic Distribution: HOME MORTGAGE REFINANCE																	State: Alabama		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Home Mortgage Refinance Loans					
	% 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	#	% of Total**				
Full-Scope:																				
Walker County, Alabama	NA	NA	NA	NA	77%	66%	23%	34%	NA	NA	NA	NA	NA	NA	346	100%				

(\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

**Table 5. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES																	State: Alabama		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Business Loans					
	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans	% of Businesses	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**				
Full-Scope:																				
Walker County, Alabama	NA	NA	NA	NA	59%	55%	41%	45%	1	57	0	0	60	52	1,397	100%				

(\*) Based on 1998 Aggregate Small Business Data only. Market rank is for all income categories combined.

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

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

Geographic Distribution: SMALL LOANS TO FARMS																	State: Alabama		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999	
MSA/Assessment Area:	Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall Market Rank*	Market Share by Geography*					Total Small Farm Loans					
	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans	% of Farms	% BANK Loans		Overall	Low	Mod	Mid	Upp	#	% of Total**				
Full-Scope:																				
Walker County, Alabama	NA	NA	NA	NA	82%	58%	18%	42%	1	79	0	0	78	81	77	100%				

(\*) Based on 1998 Aggregate Small Farm Data only. Market rank is for all income categories combined.

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

**Table 7. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE																	State: Alabama		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Purchase Loans					
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***				
Full-Scope:																				
Walker County, Alabama	20%	12%	18%	16%	19%	20%	43%	52%	NA	NA	NA	NA	NA	NA	290	100%				

(\*) As a percentage of loans with borrower income information available. No information was available for 11% of loans originated and purchased by the bank.

(\*\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

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

Borrower Distribution: HOME IMPROVEMENT																	State: Alabama		Evaluation Period: JANUARY 31, 1998 TO DECEMBER 31, 1999	
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Improvement Loans					
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total**				
Full-Scope:																				
Walker County, Alabama	20%	20%	18%	18%	19%	29%	43%	33%	NA	NA	NA	NA	NA	NA	173	100%				

(\*) As a percentage of loans with borrower income information available. No information was available for 1% of loans originated and purchased by the bank.

(\*\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

**Table 9. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE																	State: Alabama		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999									
MSA/Assessment Area:	Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall Market Rank*	Market Share by Borrower Income**					Total Home Mortgage Refinance Loans													
	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*	% of Families	% BANK Loans*		Overall	Low	Mod	Mid	Upp	#	% of Total***												
Full-Scope:																												
Walker County, Alabama	20%	6%	18%	8%	19%	19%	43%	67%	NA	NA	NA	NA	NA	NA	346	100%												

(\*) As a percentage of loans with borrower income information available. No information was available for 4% of loans originated and purchased by the bank.

(\*\*) Based on 1998 Aggregate HMDA Data only. Market rank is for all income categories combined.

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

**Table 10. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES										State: Alabama		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999							
MSA/Assessment Area:	Businesses with Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share***		Total Small Loans to Businesses											
	% 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	#	% of Total****										
Full-Scope:																			
Walker County, Alabama	75%	81%	88%	9%	3%	57	57	1,137	100%										

(\*) Businesses with revenues of \$1 million or less as a percentage of all businesses.

(\*\*) 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 3% of small loans to businesses originated and purchased by the bank.

(\*\*\*) Based on 1998 Aggregate Small Business Data only.

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



**Table 11. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS State: Alabama Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999									
MSA/Assessment Area:	Farms with Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share***		Total Small Farm Loans	
	% of Farms*	% BANK Loans**	\$100,000 or Less	> \$100,000 to \$250,000	> \$250,000 to \$500,000	All	Rev \$1 million or less	#	% of Total****
Full-Scope:									
Walker County, Alabama	88%	97%	93%	7%	0%	79	79	77	100%

(\*) Farms with revenues of \$1 million or less as a percentage of all farms.

(\*\*) 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 1% of small loans to farms originated and purchased by the bank.

(\*\*\*) Based on 1998 Aggregate Small Farm Data only.

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

**Table 12. Qualified Investments**

QUALIFIED INVESTMENTS State: Alabama Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999									
MSA/Assessment Areas:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	% of Total \$~s	#	\$ (000's)
Full-Scope:									
Walker County, Alabama	0	\$0	11	\$49	11	\$49	100%	0	0

(\*)  $\Delta$  Prior Period Investments means investments made in a previous evaluation period that are outstanding as of the examination date.

(\*\*)  $\Delta$  Unfunded Commitments means legally binding investment commitments that are tacked and reported by the bank's financial reporting system.

**Table 13. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																State: Alabama		Evaluation Period: JANUARY 1, 1998 TO DECEMBER 31, 1999			
MSA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population									
	% of Rated Area Deposits in MSA/AA	# of BANK Branches	% of Rated Area Branches in MSA/AA	Location of Branches by Income of Geographies				# of Branch Closings	# of Branch Openings	Net Change in Location of Branches (+ or -)				% of the Population within Each Geography							
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp				
Full-Scope:																					
Walker County, Alabama	100%	9	100%	0%	0%	67%	33%	1	0	0	0	0	-1	0%	0%	77%	23%				