



# LARGE BANK

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

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Public Disclosure

**August 09, 2004**

Community Reinvestment Act  
**Performance Evaluation**

**Peachtree National Bank  
Charter Number: 20668**

**2603 Highway 54 West  
Peachtree City, GA 30269**

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

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## Overall CRA Rating

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

The following table indicates the performance level of **Peachtree National Bank (PNB)** with respect to the lending, investment, and service tests:

Performance Levels	Peachtree NB (PNB) 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:

- An adequate percentage (70 percent) of PNB’s lending activity was made inside its AA.
- Overall, PNB’s lending activity reflects an excellent responsiveness in meeting the credit needs of the AA.
- Overall, the geographic distribution of loans is adequate. The geographic distribution of HMDA loans is poor. The distribution of small loans to businesses is excellent.
- The distribution of loans by income level of the borrower is excellent. The distribution of PNB’s HMDA loans and small loans to businesses is excellent.
- PNB’s level of qualified CD investments is good.
- PNB’s retail delivery systems are reasonably accessible to geographies and individuals of different income levels in its AA.
- PNB’s level of community development services is adequate given the limited opportunities in the AA and the number of services provided during this evaluation period.

## 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

Peachtree National Bank (PNB) is a \$294 million intrastate financial institution headquartered in Peachtree City, GA. PNB operates 7 banking offices and 8 ATMs throughout its AA. PNB's AA includes Fayette County in its entirety and portions of Henry, Clayton, Coweta and Fulton counties. All of these counties are included in the Atlanta MSA.

The AA is comprised of 40 census tracts, one of which is designated as low-income, five are moderate-income, 24 are middle-income and 10 are upper-income.

PNB is a wholly owned subsidiary of Synovus Financial Corp. based in Columbus, Georgia. Synovus (NYSE: "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: "TSS"), the world's largest third-party processor of international payments.

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

As of March 31, 2004, PNB's loans totaled \$245 million and deposits totaled \$246 million. Loans represent 83 percent of total assets. The distribution of PNB's loan portfolio was as follows: commercial (includes commercial real estate) (84 percent); 1-4 family residential properties (11 percent); consumer loans (3 percent), agricultural (1 percent), and other loans (1 percent). As illustrated by its loan mix, PNB is primarily a commercial lender. Small farm lending is not a significant product for the bank. PNB's Tier One Capital is \$26 million and its risk based capital to risk weighted assets equals 10.52 percent. Tier One Leverage Capital equaled 9.02 percent.

Competition in PNB's AA is very strong. PNB is ranked number 14 in the AA with a deposit market share of 0.57 percent. The dominant institutions in the AA include large multi-national institutions such as Bank of America, Wachovia, and SunTrust with a combined market share of 67.73 percent. Other competitors with a large market share include SouthTrust and NetBank with deposit market shares of 6.84 percent and 4.81 percent, respectively.

There are no legal, financial or other factors impeding PNB's ability to help meet the credit needs in its assessment area (AA). PNB's CRA performance was rated "Satisfactory" in the previous public evaluation dated January 4, 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 PNB's lending performance, we reviewed residential mortgage loans and small loans to businesses. At PNB's request, the HMDA lending activity for the mortgage company is also included in this PE.

The evaluation period for HMDA and small business loans is January 1, 1999 through December 31, 2002. For CD loans, the Investment Test and the Services Test, the evaluation period is January 5, 1999 through August 9, 2004.

### **Data Integrity**

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

During this evaluation, we reviewed PNB's processes to ensure that no major changes had occurred. Based on our evaluation, no significant changes had occurred in PNB's data collection, verification and reporting processes. 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 PNB were excluded from this evaluation because they did not meet the definition of CD.

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

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

### **Ratings**

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

PNB's assessment area includes 40 census tracts of which 1 is low-income and 5 are moderate-income; therefore, we placed more weight on the distribution of loans by borrower income as opposed to the geographic distribution of credit. By individual loan product, small loans to businesses received more weight than home mortgage loans. Small loans to farms and multi-family loans were not analyzed. PNB originated a nominal number of small loans to farms and no multi-family loans; therefore an analysis would be meaningless. In terms of home mortgage loan products, home purchase loans and refinance loans received equal weight. Home improvement loans received the least weight of the three products. This weighting is reflective of the bank's lending performance during the evaluation period and PNB's overall lending strategy.

**Other**

We performed three community contacts in conjunction with this CRA examination. The type of organizations contacted included a city official, a development corporation, and a governmental agency. In addition, we reviewed two community contacts conducted by the OCC in February 2004. One organization was an affordable housing agency and the other one was involved in economic development. Based on the information received from the community contacts, affordable housing (1-4 family and rental) and start-up loans for small businesses were identified as needs in the AA.

The opportunity to make community development loans, investments and services in the AA is somewhat limited. We identified one Community Development Corporation (CDC), three affordable housing organizations, and one Community Development Financial Institution (CDFI) that operate in PNB's AA. More CD opportunities are available in the downtown Atlanta area and other counties in the Atlanta MSA.

**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

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

#### Lending Activity

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

Overall, PNB's lending activity reflects an excellent responsiveness in meeting the credit needs of the AA.

When considering the number of competitors and comparing PNB's deposit market share and market rank to its small loans to businesses and HMDA market share and market rank, PNB's lending activity is excellent. As of June 30, 2003, PNB ranked number 14 in the AA with a deposit market share of 0.57 percent. There are 58 financial institutions with banking offices throughout the AA. The institutions ranked number 1-5 are large multi-national and regional banks that have a total of 238 banking offices in the AA and an aggregate market share of 79.38 percent. PNB ranked number 15 in making small loans to businesses with a market share of 1.19 percent. There are 183 lenders in the AA making small loans to businesses.

In terms of making HMDA loans, PNB ranked number 34 in AA with a market share of 0.61 percent. There are 452 lenders in the AA that originate and/or purchase HMDA loans. Based on the individual HMDA loan products, PNB ranked number 89 in home purchase loans (0.15 percent market share), number 5 in home improvement loans (5.05 percent market share), and number 144 in refinance loans (0.09 percent market share).

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

Overall, PNB's geographic distribution of loans is adequate. The distribution of small loans to businesses, which is the bank's primary lending activity, is excellent. PNB's distribution of HMDA loans is poor.

#### *Home Mortgage Loans*

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

In reviewing PNB's lending in the low-income geography, we reviewed demographic information to determine why their lending activity appeared low. We determined that the following factors contributed to PNB's low lending activity in this geography. PNB's AA has one low-income census tract. The opportunity to make mortgage loans in this low-income tract is very limited. The low-income census tract only has 149 housing units, of which only 36 are owner-occupied units.

Overall, PNB's geographic distribution of HMDA loans is poor. PNB's weak lending performance in the low-income geography is mitigated by the factors discussed above. However, their lending in moderate-income geographies is considered very poor.

PNB's geographic distribution of *home purchase loans* is poor. PNB did not make any loans in the low-income census tract during this evaluation period. In moderate-income census tracts, PNB's lending activity is significantly lower than the percentage of owner-occupied units in these tracts. Also, PNB's market share in moderate-income tracts is lower than its overall market share of lending in all census tracts.

PNB's geographic distribution of *home improvement loans* is poor. PNB did not make any loans in the low-income census tract during this evaluation period. In moderate-income census tracts, PNB's lending activity is significantly lower than the percentage of owner-occupied units in these tracts. During 2002, PNB did not make any home improvement loans in low- or moderate-income census tracts; therefore its market share in these tracts was zero.

PNB's geographic distribution of *refinance loans* is also poor. PNB did not make any refinance loans in the low-income census tract during this evaluation period. PNB's lending activity in moderate-income census tracts is significantly lower than the percentage of owner-occupied units in these tracts. During 2002, PNB did not make any refinance loans in low- or moderate-income census tracts; therefore its market share in these tracts was zero.

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

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

PNB's geographic distribution of small loans to businesses is excellent.

In the low-income census tract, PNB's lending activity exceeds the percentage of businesses located in this tract. In moderate-income census tracts, PNB's lending activity significantly exceeds the percentage of businesses located in these tracts. PNB's market share in the low-income tract is lower than its overall market share. However, PNB's market share in moderate-income census tracts significantly exceeds its overall market share.

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

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

Small loans to farms were not analyzed during this examination. The data is shown in the tables for informational purposes only.

### **Lending Gap Analysis**

We evaluated PNB's lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We reviewed lending reports detailing the volume of home mortgage and small loans to businesses loans in the AA. No unexplained conspicuous gaps

were identified. PNB made home mortgage and/or small loans to businesses in all census tracts in its AA.

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

During this evaluation period, an adequate percentage (70 percent) of PNB's lending activity was inside its AA. By individual loans products, 69 percent of small loans to businesses and 75 percent of HMDA loans were inside the AA. This assessment did not include the lending activity of the mortgage company.

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

Overall, PNB's distribution of loans by the income level of the borrower is excellent. The distribution of home mortgage loans is excellent. PNB's distribution of small loans to businesses is excellent.

### ***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.

In evaluating PNB's lending performance to low-income borrowers we considered the percentage of the families in the AA that live below the poverty level and the high cost of housing in the Atlanta MSA.

Based on 1990 census information, approximately 5 percent of the families in the AA live below the poverty level. To further exacerbate the situation; 2000 housing information showed that the average cost of a house in the AA is \$137,800. An individual would have to earn at least \$44 thousand per year to afford a house of this cost. These factors could contribute to PNB's inability to make HMDA type loans to some low- or moderate-income individuals.

Overall, the distribution of home mortgage loans to borrowers of different income levels is excellent.

PNB's distribution of *home purchase loans* to borrowers is excellent. PNB's percentage of loans to low-income borrowers is lower than the percentage of low-income families that reside in the AA. However, when the demographic factors discussed above are considered, PNB's lending performance to low-income borrowers is good. PNB's percentage of loans to moderate-income borrowers significantly exceeds the percentage of the families that are moderate-income. PNB's market share to low-income borrowers is lower than its overall market share of loans to all borrowers. PNB's market share of loans to moderate-income borrowers is also lower than its overall market share of loans to all borrowers.

PNB's distribution of *home improvement loans* is good. PNB's percentage of loans to low-income borrowers is lower than the percentage of low-income families residing in the AA, but is considered adequate based on the mitigating factors discussed above. PNB's percentage of loans to moderate-income borrowers exceeds the percentage of moderate-income families in the AA. PNB's market share of home improvement loans to low-income borrowers is lower

than its overall market share of loans to all borrowers. However, PNB's market share of loans to moderate-income borrowers is near its overall market share of loans to all borrowers.

PNB's distribution of *refinance loans* is excellent. PNB's percentage of loans to low-income borrowers is lower than the percentage of low-income families in the AA, however, PNB's performance is considered excellent when considering the mitigating factors in lending to low-income borrowers discussed above. PNB's percentage of loans to moderate-income borrowers slightly exceeds the percentage of moderate-income families in the AA. PNB's market share of refinance loans to low-income borrowers exceeds its market share of loans to all borrowers. PNB's market share of loans to moderate-income borrowers is lower than its overall market share of loans to all borrowers.

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

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

The overall distribution of small loans to businesses is excellent. PNB's distribution of loans to small businesses (businesses with revenues less than \$1 million) exceeds the percentage of businesses in the AA that are small. PNB's market share of loans to small business also exceeds its overall market share to all businesses. Approximately, 65 percent of loans made were in amounts less than \$100 thousand, which exceeds the percentage of businesses with revenues of \$1 million or less. This further illustrates PNB's commitment to meeting the lending needs for small loans to small businesses.

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

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

Small loans to farms were not analyzed during this examination. The data is shown in tables for informational purposes only.

### **Community Development Lending**

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

PNB did not originate and/or purchase any CD loans during this evaluation period. This had a neutral impact on the lending test rating.

### **Product Innovation and Flexibility**

PNB 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**

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

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

PNB's level of qualified CD investments is good. This assessment is based on the dollar amount of the investments made and the limited investment opportunities in the AA. Refer to the Scope of the Evaluation section of this document for additional information on the investment opportunities in this AA.

During this evaluation period, PNB made fourteen qualified CD investments totaling \$1.1 million. This represents 4.16 percent of Tier One Capital. Of the total investment amount, \$865 thousand consisted of three mortgage-backed securities that were secured by mortgage loans to low- or moderate-income individuals in the AA. The mortgage-back securities represent 79 percent of the total investment amount and they also represent 3.27 percent of Tier One Capital.

Another \$149 thousand consists of investments in a Small Business Investment Company (SBIC) that makes loans throughout the state of Georgia. The primary purpose of the SBIC is to provide multi-family housing for low- and moderate-income individuals. The remaining \$87 thousand were donations to a community development organization in the AA that provides services to low- and moderate-income individuals.

All of the investments were made during this evaluation period. There were no prior period investments submitted to us for consideration. These investments were not considered innovative in nature but did meet an identified credit need within the community, providing affordable housing for low- and moderate-income individuals.

## **SERVICE TEST**

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

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

### **Retail Banking Services**

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

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

PNB operates seven banking offices in the AA, none of which are located in a low- or moderate-income census tract. This is somewhat below demographic information that shows that 0.15 percent and 11.09 percent of the population in the AA reside in low- or moderate-income census tracts, respectively. Of the seven banking offices, five (71percent) are located in upper-income and two (29 percent) are located in middle-income census tracts.

PNB's banking offices are reasonably accessible to the low- and moderate-income census tracts. PNB has a banking office located approximately eight to twelve miles from the low- and moderate-income tracts. This is reasonably accessible to the individuals located in these geographies. In addition, eight other financial institutions located in the area are adequately serving the individuals located in these tracts. In addition, there are several ATMs and other non-banking entities in the area.

While some changes have been made during this evaluation period, PNB's record of opening and closing branches have not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. PNB opened two branches and closed one of its branches during this evaluation period. Of the branches opened, both were located in upper-income census tracts. The branch that PNB closed was located in a moderate-income census tract (Forest Park area). Five other banks with a total of six branches continue to serve the area. Also, PNB continues to offer service to the residents in Forest Park through its Riverdale branch, located six miles away.

PNB offers a range of banking products and services. Banking hours do not vary significantly from one location to another but are tailored to meet the needs of each individual market.

### **Community Development Services**

PNB's level of community development services is adequate given the limited opportunities in the AA and the number of services provided during this evaluation period. During this evaluation period, two employees provided qualified community development services to one organization. The type of services provided include serving as a member or on the Board for an organization that provides economic development for the state of Georgia.



## 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: 01/05/1999 to 08/09/2004	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
PNB Peachtree City, GA	HMDA loans, small loans to businesses 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)	40	2.50	12.50	60.00	25.00	0.00
Population by Geography	291,818	0.15	11.09	65.69	23.08	0.00
Owner-Occupied Housing by Geography	73,008	0.05	8.54	64.70	26.71	0.00
Business by Geography	26,383	0.85	9.02	59.71	30.42	0.00
Farms by Geography	476	0.21	4.41	65.13	30.25	0.00
Family Distribution by Income Level	80,949	16.19	19.20	27.27	37.34	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	28,651	0.29	18.48	67.42	13.81	0.00
Median Family Income		41,047	Median Housing Value		81,820	
HUD Adjusted Median Family Income for 2002		71,200	Unemployment Rate (1990 US Census)		2.58%	
Households Below Poverty Level		6.8%				

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

PNB’s AA consists of Fayette County in its entirety, the majority of Clayton and Henry counties, two census tracts in Coweta County and one census tract in Fulton County. PNB’s AA consist of 40 census tracts, of which one is a low-income census tract and five are moderate-income census tracts. The low- and moderate-income census tracts are located Clayton County. PNB operates one branch in Clayton County. PNB’s AA meets the legal requirements of the regulation and does not arbitrarily exclude any areas including low- or moderate-income neighborhoods.

PNB operates seven offices within the AA. All seven offices are full-service banking facilities that accept deposits and make loans. Two of the seven offices are located at local grocery stores. In addition, PNB has eight ATMs; one of the ATMs is a stand alone ATM located at a local hospital and the other seven ATMs are located at the full-service banking offices.

Competition in the AA is very strong. Approximately 58 financial institutions have 431 offices operating in the AA. Several large multi-state and regional banks are the dominant institutions in the AA. Locally owned community banks and credit unions also provide competition. PNB ranks number 14 in the AA with a deposit market share of 0.57 percent.

Historically, the Atlanta MSA was internationally recognized as the transportation, communication, industrial, and cultural center of the Southeastern United States. Due to its location and extensive transportation network, Atlanta developed into a major distribution center for the Southeast. Distribution and associated industrial activities are gradually being transferred to other urban centers in the South, while Atlanta has evolved as a major provider of technological and financial support services.

The Atlanta MSA has a diverse industrial base that includes manufacturing, transportation, distribution, retailing, wholesaling, finance, government, research, education, medicine, and technical support. As a result, the unemployment rate in the AA has historically been relatively low. As of June 2004, the unemployment rate for the AA was 4.46 percent compared to the state average of 4.6 percent.

Ninety percent of the Fortune 500 companies maintain regional offices in the Atlanta area. In addition, ninety-eight of the nation's top industrial firms maintain some type of operational facility in metro Atlanta. Foreign trade has played a significant role in the area's growth over the last two decades. More than 200 foreign firms have established their U.S. headquarters in Atlanta. Of these companies, thirty-one are foreign-based banks with offices in Atlanta. Also, Atlanta is home to the largest and most efficient airport in the world, the Hartsfield International Airport. The airport is within two hours flight of 80 percent of the nation's population.

One of the primary needs in the Atlanta MSA is affordable housing. This includes both 1-4 family and rental housing units. According to the 1995 HUD Consolidate Plan, affordable housing is being provided primarily through rental units, especially as single-family housing prices have increased over the past two decades. The production of new affordable rental units has not kept up with the demand. Of the new multi-family houses built, most are out of reach of most low-income residents. Twenty-eight percent of extremely low-, very low-, and low-income households have housing cost burdens that are 50 percent of their income or higher, and 55 percent of this population has housing cost burdens of 30 percent or more. The barriers in the development of new affordable housing units are inadequate venture capital, construction loans, and permanent financing. Also, the non-profit organizations have limited development capacity to produce housing and the development costs are high.

## 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. FNB chose not to submit consumer data for analysis in this PE. Therefore, Table 13 was excluded from this document.

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 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.

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Table 1. Lending Volume

LENDING VOLUME													Geography: GEORGIA		Evaluation Period: JANUARY 1, 1999 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	708	76,385	1,095	137,783	3	115	0	0	1,806	214,283	100.00				

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE																Geography: GEORGIA		Evaluation Period: JANUARY 1, 1999 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	275	100.00	0.05	0.00	8.54	1.45	64.70	56.73	26.71	41.82	0.15	0.00	0.12	0.06	0.48				

\* 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 January 05, 1999 to August 2, 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.



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Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: GEORGIA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography <sup>*</sup>				
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 <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans					
<b>Full Review:</b>															
Atlanta MSA AA	159	100.00	0.05	0.00	8.54	0.63	64.70	32.08	26.71	67.30	5.05	0.00	0.00	2.34	13.10

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: GEORGIA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002					Market Share (%) by Geography <sup>*</sup>				
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 <sup>**</sup>	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans	% Owner Occ Units <sup>***</sup>	% BANK Loans					
<b>Full Review:</b>															
Atlanta MSA AA	274	100.00	0.05	0.00	8.54	1.09	64.70	45.99	26.71	52.92	0.09	0.00	0.00	0.06	0.17

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

<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> 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.

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

<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.

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

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Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY		Geography: GEORGIA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% of MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	% MF Units <sup>***</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta MSA AA	0	0.00	0.00	0.00	22.97	0.00	70.98	0.00	6.05	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 1, 1999 TO DECEMBER 31, 2002									
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography <sup>*</sup>				
	#	% of Total <sup>**</sup>	% of Businesses <sup>**</sup>	% BANK Loans	% of Businesses <sup>**</sup>	% BANK Loans	% of Businesses <sup>**</sup>	% BANK Loans	% of Businesses <sup>**</sup>	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta MSA AA	1,095	100.00	0.85	1.00	9.02	13.61	59.71	39.54	30.42	45.84	1.19	0.46	1.92	1.73	0.91

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

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

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

<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> Source Data - Dun and Bradstreet (2003).

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Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS		Geography: GEORGIA					Evaluation Period: JANUARY 1, 1999 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**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans						
<b>Full Review:</b>																
Atlanta MSA AA	3	100.00	0.21	0.00	4.41	0.00	65.13	0.00	30.25	100.00	0.00	0.00	0.00	0.00	0.00	

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: GEORGIA					Evaluation Period: JANUARY 1, 1999 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**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans*** *	% Families***	% BANK Loans****						
<b>Full Review:</b>																
Atlanta MSA AA	275	100.00	16.19	12.03	19.20	33.46	27.27	28.20	37.34	26.32	0.18	0.04	0.08	0.18	0.51	

<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 3.27% 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.

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Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT												Geography: GEORGIA		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>†</sup>							
	#	% 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>	Overall	Low	Mod	Mid	Upp			
<b>Full Review:</b>																		
Atlanta MSA AA	159	100.00	16.19	7.59	19.20	22.15	27.27	29.75	37.34	40.51	5.40	2.16	4.33	5.45	8.80			

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE												Geography: GEORGIA		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2002				
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share <sup>†</sup>							
	#	% 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>	Overall	Low	Mod	Mid	Upp			
<b>Full Review:</b>																		
Atlanta MSA AA	274	100.00	16.19	12.93	19.20	19.39	27.27	25.86	37.34	41.83	0.10	0.19	0.04	0.04	0.17			

<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 0.63% 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 4.01% 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.

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Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: GEORGIA			Evaluation Period: JANUARY 1, 1999 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	1,095	100.00	64.31	75.07	65.48	21.10	13.42	1.19	3.21

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: GEORGIA			Evaluation Period: JANUARY 1, 1999 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	3	100.00	92.44	100.00	100.00	0.00	0.00	0.00	0.00

<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 0.18% 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.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
		Geography: GEORGIA				Evaluation Period: JANUARY 5, 1999 TO AUGUST 9, 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	16	1,101	16	1,101	100.00	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
		Geography: GEORGIA						Evaluation Period: JANUARY 5, 1999 TO AUGUST 9, 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	7	100	0.00	0.00	33.33	66.67	2	1	0	-1	0	+2	0.15	11.09	65.69	23.08

\* '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.