



## **PUBLIC DISCLOSURE**

May 12, 2014

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Certusbank, National Association  
Charter Number 24975

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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 **Needs to Improve**

The following table indicates the performance level of **CertusBank N.A. (Certus)** with respect to the lending, investment, and Service Tests:

Performance Levels	CertusBank N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory		X	X
Needs to Improve	X		
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:

- A small percentage of the bank's loans were made in their assessment areas (AAs).
- The bank demonstrated poor responsiveness to credit needs in its AAs, taking into account the number and amount of home mortgage and small business loans originated during the evaluation period.
- The geographic distribution of loans is poor.
- The bank made a low level of community development loans.
- The bank made an adequate level of qualified investments that were responsive to credit and community development needs.
- Its service delivery systems are reasonably accessible to geographies and individuals of different income levels in its assessment area(s).
- To the extent changes were made, the opening and closing of branches adversely impacted the accessibility of delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals.
- The bank provided a limited level of community development services.

## 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.

**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 statistical 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.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
  - a. Rates of poverty, unemployment, and population loss; or
  - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

**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 householder' 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 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 applications, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include data on loan pricing, the lien status of the collateral, any requests for preapproval and loans for manufactured housing.

**Home Mortgage Loans:** Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing and one-to-four family dwellings other than manufactured housing.

**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 metropolitan statistical area or metropolitan division, as defined by the Office of Management and Budget and any other area designated as such by the appropriate federal financial supervisory agency.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Metropolitan Statistical Area that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as having at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

**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.

**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 at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Description of Institution

CertusBank, NA (“Certus” or “bank”) is an interstate bank headquartered in Greenville, South Carolina (SC), and wholly owned by CertusHoldings, Inc. (CHI), a one-bank holding company headquartered in Atlanta, Georgia (GA). Certus has two subsidiaries; Certus Bank Community Development, LLC, which is currently inactive, and Certus Insurance, LLC. CHI owns two non-bank subsidiaries; CertusSecurities, Inc., and CertusInvestment Advisors. The bank was chartered in January 2011 with the acquisition of Community Bank and Trust of Easley, Easley, SC, a failed financial institution. During the evaluation period, Certus acquired four additional failed institutions, two mortgage firms, and one SBA lending operation: First Georgia Banking Company, Franklin, GA and Atlantic Southern Bank, Macon, GA, in May 2011; Hometown Community Bank, Braselton, GA, in November 2012; Myers Park Mortgage Inc., Charlotte, North Carolina (NC), in August 2012; Quadrant Financial, Savannah, GA, in October 2012; Resource Financial Services of Columbia, SC, in December 2012; and Parkway Bank, Hickory, NC, in April 2013.

Certus offers a full range of consumer and commercial banking deposit and loan products. The bank currently operates 35 branches distributed across 18 assessment areas (AAs) in Florida (FL), Georgia, North Carolina, and South Carolina. Of the 35 branch offices, 29 were acquired and six were de novo offices. Certus closed six branches in Georgia during the evaluation period, one of which was located in a low-income geography, and one in a moderate-income geography.

As of March 31, 2014, total assets were \$1.6 billion and Tier 1 capital was \$136 million. Total net loans outstanding were \$969 million. The bank’s loan portfolio consists of 29.9% non-farm non-residential loans, 27.4% commercial & industrial loans, 24.7% 1-4 family residential loans, 13.1% construction and development loans, and 4.9% in all other loans. Total deposits as of March 31, 2014 were \$1.4 billion.

There were no legal or financial factors impeding the bank’s ability during the evaluation period to help meet credit needs in its AAs. This is the first CRA evaluation for Certus.



## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This Performance Evaluation (PE) assesses the bank's performance under the Lending, Investment, and Service Tests. With the exception of community development (CD) loans, the evaluation period for the Lending Test is January 1, 2011 through December 31, 2013. For CD loans, the Investment Test, and the Service Test, the evaluation period is January 22, 2011, through May 5, 2014.

In evaluating the bank's lending performance, we reviewed home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) for calendar years 2012 and 2013. We also used data from small business loans originated during 2012 and 2013. Our analysis of small business lending is based on a sample of 70 loans from calendar year 2012 and 60 loans from calendar year 2013. There were no small loans to farms in the selected loan samples. Additionally, Certus originated only five multifamily residential mortgage loans across all AAs during the evaluation period. The number is not sufficient to conduct a meaningful analysis. Small farm loans and multifamily loans were not considered during this evaluation. As a result, Tables 5, 7, and 12 are not included in the PE.

In the lending analysis, we compared loan data to demographic data drawn from the U.S. Census 2006-2010 American Community Survey (ACS), and the 2012 Dunn and Bradstreet small business demographic data. We used 2012 HMDA peer mortgage data to determine the bank's market share of home mortgage lending in each AA. Certus was not a CRA small business or small farm loan reporter in 2012. Therefore, no market share comparisons for performance related to small business lending were made. Bank and branch deposit data is as of June 30, 2013 and was drawn from the Federal Deposit Insurance Corporation (FDIC).

### Data Integrity

Prior to this evaluation, we selected and tested samples of HMDA and small business and small farm loan data to determine the accuracy and reliability of the data for use in this CRA evaluation. The HMDA data was determined to be accurate and reliable for use in evaluating the bank's performance under the Lending Test. The small business data was not accurate. As a result, loan data gathered during two data integrity reviews was used to evaluate the bank's performance relative to small business lending.

### Selection of Areas for Full-Scope Review

We selected one AA in each state where the bank has an office for a full-scope review. Refer to the "Scope" section under each state rating for details regarding how the areas were selected.

### Ratings

The bank's overall rating is a blend of the state ratings. The bank's performance in Georgia and South Carolina were weighted equally and more heavily than the bank's performance in North Carolina or Florida. The bank's performance in Florida received the least weight because of the bank's limited presence in the state.

Home mortgage loans reported under HMDA were weighted more heavily than small business loans. All loans originated and reported under HMDA were included in the performance analysis. Only

sampled small business loans were used. Among home mortgage loans, home purchase and home refinance loans were weighted equally, with less weight given to home improvement loans. In most cases, the volume of home mortgage and home refinance loans were relatively well balanced. There were few home improvement loans made during the evaluation period.

The state ratings are based primarily on those areas that received full-scope reviews with consideration given to performance in areas that received limited-scope reviews.

## **Fair Lending or Other Illegal Credit Practices Review**

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

## State Rating

### State of Florida

<b>CRA Rating for Florida:</b>	<b>Needs to Improve</b>
<b>The Lending Test is rated:</b>	Substantial Noncompliance
<b>The Investment Test is rated:</b>	High Satisfactory
<b>The Service Test is rated:</b>	Needs to Improve

#### The major factors that support this rating include:

- Overall lending levels reflect very poor responsiveness to credit needs, taking into account the number and amount of home mortgage and small loans to businesses originated in its AAs.
- The overall geographic distribution of loans is poor.
- The overall distribution of loans to individuals of different income levels is very poor.
- No community development loans were made in Florida during the evaluation period.
- The bank made a significant level of qualified investments that represented good responsiveness to credit and community development needs, considering the bank's limited presence in the market.
- The bank provided few community development services in the AA.

### Description of Institution's Operations in Florida

Certus has one AA in FL, established in 2011 with the bank's acquisition of a failed Georgia bank. The Jacksonville AA is comprised of portions of Duval and St. Johns counties.

Certus provides a full range of loan and deposit products and services to its AA through three branches. During the evaluation period, 3.1% of bank-wide deposits and 0.5% of originated loans were from the state. As of June 30, 2013, the date for which deposit data is available, the bank had one branch in Jacksonville, which held \$1.4 million in deposits. This represented 0.1% of area deposits. The bank ranked number 21 of 31 depository institutions in the AA. Two branches were opened after June 30, 2013: one in November of 2013; and one in February of 2014. No branches are located in low- or moderate-income geographies. The state's largest depository institutions are Bank of America, N.A., Wells Fargo Bank, N.A., and SunTrust Bank.

Refer to the Market Profile in appendix C for detailed demographics and other performance context information for the Jacksonville AA which received a full-scope review.

### Scope of Evaluation in Florida

Ratings are based on the results of this full-scope review. Refer to the table in appendix A for more information.

In evaluating the bank's lending performance, we considered their limited presence in the AA and the number and expertise of branch staff.

During the evaluation, we made one community contact with a non-profit organization that provides affordable housing to families in the Jacksonville AA. The contact did not mention specific credit needs,

but indicated there were opportunities for banks to provide funding for projects and mortgage loans to home buyers.

## **LENDING TEST**

### **Conclusions for Area Receiving a Full-Scope Review**

The bank's performance under the Lending Test in Florida is rated **Substantial Non-compliance**. Based on a full-scope review, the bank's performance in the Jacksonville AA is very poor.

### **Lending Activity**

Refer to Table 1 Lending Volume in the state of Florida section of appendix D for the facts and data used to evaluate the bank's lending activity.

Overall lending levels reflect very poor responsiveness to credit needs, taking into account the number and amount of home mortgage and small loans to businesses originated in its AA. Certus made four small loans to businesses, two home improvement loans, and two home refinance loans in the AA during the evaluation period. Certus made no home purchase loans.

There are no market share comparisons for home mortgage loans. There were 390 HMDA reporters in the Jacksonville area during 2012. Certus made no home improvement loans and only one home refinance loan in 2012. The bank is not ranked and showed no market share in home refinance loans on reports used to determine market share from peer mortgage data.

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

The overall distribution of loans by income level of the geography is poor. The distribution of home mortgage loans by income level of the geography is very poor. The distribution of small loans to businesses by income level of the geography is good.

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

Refer to Tables 2, 3, 4 and 5 in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

In evaluating the bank's performance, we considered that owner-occupied units in low-income geographies comprised only 3.8% of total units in the AA. We also considered that only 4.3% of businesses were located in low-income geographies.

#### ***Home Improvement Loans***

The geographic distribution of home improvement loans in the Jacksonville AA is very poor. Certus made two home improvement loans in the AA during our review period. Neither loan is located in a low- or moderate-income geography.

### ***Home Refinance Loans***

The geographic distribution of home refinance loans in the Jacksonville AA is very poor. Certus made two home refinance loans in the AA during the evaluation period. Neither loan is located in a low- or moderate-income geography.

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

Refer to Table 6 in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good. Certus made no loans to businesses in low-income geographies. The bank's percentage of small loans to businesses in moderate-income geographies exceeded the percentage of businesses located in these geographies. Certus made two of four loans to businesses in moderate-income geographies.

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

We evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were made to the geographies in the AA. We considered loan distributions, branch locations, competition, market conditions, demographic information, and bank capacity and restraints during the evaluation period. No unexplained conspicuous gaps were identified, other than those created by such a low volume of lending. This had a neutral impact on our conclusion regarding the bank's geographic distribution of loans.

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

A small percentage of the bank's loans were made in their AAs. Overall, 45.0% of the bank's loan originations were in their AAs. For home mortgage loans, 43.7% of all originations were in the AAs. By loan product 55.8% of all home purchase loans, 28.2% of all home improvement loans, and 37.4% of all home refinance loans were in the bank's AAs. For loans to businesses, 82.7% were in the bank's AAs.

This analysis was performed on the entire bank rather than by AA and factored into the overall analysis of the geographic distribution of lending by income level of geography.

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

The overall distribution of loans by borrower income level in the AA is adequate. The distribution of home mortgage loans by borrower income level is very poor. The distribution of small loans to businesses is excellent.

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

Refer to Tables 8, 9 and 10 in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Home Improvement Loans***

The distribution of home improvement loans by income level of the borrower is very poor. Certus made no home improvement loans to low or moderate income borrowers.

### ***Home Refinance Loans***

The distribution of home refinance loans by income level of the borrower is very poor. Certus made no home refinance loans to low or moderate income borrowers.

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

Refer to Table 11 in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of loans to small businesses (businesses with gross annual revenues of \$1 million or less) is excellent. All four loans originated during the evaluation period were to small businesses. An adequate percentage of small loans to businesses were for amounts less than \$100 thousand.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the state of Florida section of appendix D for the facts and data used to evaluate the bank's level of community development lending.

Certus made no community development loans in the Jacksonville AA during the evaluation period. This had a negative impact on the bank's lending test rating for Florida.

### **Product Innovation and Flexibility**

The bank made no use of innovative or flexible lending practices during the evaluation period. While Certus offers loans guaranteed by government programs such as the Federal Housing Administration (FHA), the Veteran's Administration (VA), the U.S. Department of Agriculture (USDA), and the Small Business Administration (SBA), no loans were originated under these programs during the evaluation period. This had a neutral impact on lending performance.

## **INVESTMENT TEST**

### **Conclusions for Area Receiving a Full-Scope Review**

The bank's performance under the Investment Test in Florida is rated **High Satisfactory**. Based on a full-scope review, the bank's performance in the Jacksonville AA is good.

Refer to Table 14 in the state of Florida section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Certus made a significant level of qualified investments that represented good responsiveness to credit and community development needs, considering the bank's limited presence in the market. The bank made five qualified investments totaling \$2.0 million in the Jacksonville AA and one qualified investment of \$1.0 million in the broader statewide area that included the AA. All investments support affordable housing. One investment of \$610.1 thousand provided 388 units of affordable housing for

low- and moderate-income individuals in the AA. One investment of \$1.0 million is in a state housing authority that finances affordable housing throughout Florida.

## **SERVICE TEST**

### **Conclusions for Area Receiving a Full-Scope Review**

The bank's performance under the Service Test in Florida is rated **Needs to Improve**. Based on a full-scope review, the bank's performance in the Jacksonville AA is poor.

### **Retail Banking Services**

Refer to Table 15 in the state of Florida section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AA. To the extent changes were made, its record of opening branches has generally not adversely affected the accessibility of its delivery systems in low- or moderate-income geographies or for low- or moderate-income individuals. Its services do not vary in a way that inconveniences its AA. The bank operates three full service branches in the AA, all of which are located in upper income geographies. Deposit taking ATMs are located at two branches. The bank also operates one free-standing non-deposit taking ATM in a middle income geography.

### **Community Development Services**

The bank provided few community development services in the AA. During the evaluation period, only one bank employee provided technical assistance to an after school program targeted to low- and moderate-income students. Although resources were limited, staff were heavily involved in community activities not considered to be community development under CRA or responsive to community development needs.

## State Rating

### State of Georgia

<b>CRA Rating for Georgia:</b>	<b>Needs to Improve</b>
<b>The Lending Test is rated:</b>	Low Satisfactory
<b>The Investment Test is rated:</b>	Needs to Improve
<b>The Service Test is rated:</b>	Needs to Improve

#### The major factors that support this rating include:

- The geographic distribution of loans in Georgia is adequate.
- The distribution of loans among individuals of different income levels and businesses of different sizes is adequate.
- The bank made a low level of community development loans in Georgia.
- The bank made a poor level of qualified investments that exhibited poor responsiveness to credit and community development needs in its AAs.
- To the extent changes were made, the opening and closing of branches adversely impacted the accessibility of delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals.
- The bank provided few community development services.

### Description of Institution's Operations in Georgia

Certus acquired two failed banks in Georgia In May of 2011; First Georgia Banking Company, Franklin, and Atlantic Southern Bank, Macon. Through these acquisitions, Certus gained 26 branch offices throughout Northern and Southern Georgia, of which six were closed during the evaluation period.

Certus provides a full range of loan and deposit products and services to its AAs through 19 branches. During the evaluation period, 63.3% of bank-wide deposits and 26.1% of originated loans were from the state. As of June 30, 2013, Certus held deposits totaling \$972 million in Georgia, which represented a 4.0% market share and ranked the bank number 6 of 67 financial institutions with operations in Georgia. The state's largest depository institutions are Synovus Bank, SunTrust Bank, and Wells Fargo Bank, N.A.

The most significant AAs in the state, in terms of lending and deposits, are the Atlanta, Macon, and Non-MSA AAs. The Atlanta AA includes the contiguous counties of Carroll, Haralson, and Heard. This AA is home to three branches, and accounts for 26.4% of rated area deposits and 32.3% of rated area loans originated during the evaluation period. The Macon AA is comprised of Bibb County. The AA is home to four branches, and accounts for approximately 17.8% of rated area deposits and approximately 18.1% of rated area loans originated during the evaluation period. During the evaluation period, the bank closed three branches in the Macon AA. Of these closed branches, one branch was in an upper-income geography (a drive-thru facility), one branch was in a middle-income geography, and one branch was in a moderate-income geography. The Non-MSA AA includes the non-metropolitan counties of Banks, Greene, Habersham, Jackson, and Peach. This AA is home to five branches and accounts for 24.9% of rated area deposits and approximately 17.1% of rated area loans originated during the evaluation period. There is a high concentration of distressed nonmetropolitan middle-income geographies in Banks,



Green, and Peach Counties. Of the total 17 census tracts in these counties, 14 are designated distressed nonmetropolitan middle-income geographies because of high poverty rates.

The Columbus, Warner-Robins, Savannah, and Brunswick AAs represent limited significance with regard to the bank's deposit and lending operations in the state. The Columbus AA is composed of Muscogee County and is home to one branch. The AA accounts for 9.7% of rated area deposits and approximately 4.2% of rated area loans originated during the evaluation period. The Warner-Robins AA consists of Houston County and is home to one branch. This AA accounts for 5.8% of rated area deposits and 6.1% of rated area loans originated during the evaluation period. On June 30, 2013, management closed the Bonaire, GA, branch located in a middle-income geography in Houston County. The Savannah AA is comprised of the two contiguous counties of Chatham and Effingham and is home to two branch offices. The AA accounts for 5.1% of area rated deposits and 9.3% of rated area loans originated during the evaluation period. The Brunswick AA is composed of Glynn County and is home to one branch. This AA accounts for 3.5% of rated area deposits and 6.4% of rated area loans originated during the evaluation period. On June 30, 2013, management closed the Darien, GA, branch office located in a middle-income geography in McIntosh County, which is part of the Brunswick AA.

The Athens, Dalton, and the Valdosta AAs represent minimal significance in regard to the bank's deposit and lending operations in the state. The Athens AA is comprised of Oconee County and is home to one branch. This AA accounts for 3.5% of total rated area deposits and 1.0% of rated area loans. The Dalton AA is comprised solely of Whitfield County and is home to one branch. This AA accounts for 3.0% of total rated area deposits and 1.5% of rated area loans. The Valdosta AA consists of Lowndes County and is home to one branch office. The AA accounts for 0.4% of rated area deposits and 4.2% of rated area loans originated during the evaluation period. In January 2014, management closed the Valdosta office located in a low-income geography.

Refer to the Market Profile in appendix C for detailed demographics and other performance context information for the Atlanta AA which received a full-scope review.

## **Scope of Evaluation in Georgia**

The Atlanta AA received a full-scope evaluation. The Athens, Brunswick, Columbus, Dalton, Macon, Savannah, Valdosta, Warner Robins, and Non-MSA AAs received limited-scope evaluations. The ratings for the state of Georgia are primarily based on the results of the full-scope review of the Atlanta AA, but were heavily influenced by performance in the limited-scope areas. Refer to the table in appendix A for more information.

During our examination, we contacted a community non-profit housing organization serving Carroll County. This community contact indicated that local economic conditions are improving with new companies locating in the area and existing companies are expanding their operations. In addition, the housing representative stated that there is shortage of affordable housing for LMI individuals and there is a massive waiting list for subsidized housing. In addition, credit problems are a significant obstacle for low-income individuals in purchasing homes.

## **LENDING TEST**

### **Conclusions for Area Receiving a Full-Scope Review**

The bank's performance under the Lending Test in Georgia is rated **Low Satisfactory**. Based on a full-scope review, the bank's performance in the Atlanta AA is adequate.

## **Lending Activity**

Refer to Table 1 Lending Volume in the state of Georgia section of appendix D for the facts and data used to evaluate the bank's lending activity.

Overall lending levels reflect poor responsiveness to credit needs in the Atlanta AA, taking into account the number and amount of home mortgage and small loans to businesses originated in its AA. Of total bank deposits, 16.7% are in the Atlanta AA compared to 8.4% of total loans originated during the evaluation period. Based on 2012 HMDA Peer Mortgage Data, Certus had a 0.2% market share and ranked number 54 out of 217 lenders in overall home mortgage lending in the Atlanta AA. The bank had a 0.1% market share and ranked number 72 out of 127 lenders in home purchase lending. The bank had a 0.7% market share and ranked number 26 out of 217 lenders in home refinance lending. Certus made no home improvement loans in the AA during the evaluation period.

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

The overall distribution of loans by income level of the geography in the Atlanta AA is good. The distribution of home mortgage loans in is good. The distribution of small loans to businesses is good.

In evaluating performance, we considered that owner-occupied units in low-income geographies comprised only 0.6% of total units in the AA and that only 1.6% of businesses were located in low-income geographies.

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

Refer to Tables 2, 3, 4 and 5 in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

### ***Home Purchase Loans***

The geographic distribution of home purchase loans in the Atlanta AA is good. The bank made no loans in low-income geographies. The bank's percentage of home purchase loans in moderate-income geographies exceeded the percentage of owner-occupied units in moderate-income geographies. The bank's market share of home purchase loans in moderate-income geographies exceeded the bank's overall market share of home purchase loans.

### ***Home Refinance Loans***

The geographic distribution of home refinance loans is excellent. The bank's percentage of home refinance loans in low- and moderate-income geographies exceeded the percentage of owner-occupied units in those geographies. The bank made no loans in low-income geographies during 2012, the period for which comparisons are made. The bank's market share of home refinance loans in moderate-income geographies exceeded the bank's overall market share.

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

Refer to Table 6 in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is good, based on the factors discussed above. The bank made no small loans to businesses in low-income geographies. The percentage of small loans to businesses in moderate-income geographies is near to the percentage of businesses located in moderate-income geographies.

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

We evaluated the lending distribution in this AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were made to the geographies in the AA. We considered loan distributions, branch locations, competition, market conditions, demographic information, and bank capacity and restraints during the evaluation period. No unexplained conspicuous gaps were identified. This had a neutral impact on our conclusion regarding the bank's geographic distribution of loans.

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

The overall distribution of loans by borrower income level in the Atlanta AA is adequate. The distribution of home mortgage loans by borrower income level is adequate. The distribution of loans to small businesses (businesses with gross annual revenue of \$1 million or less) is very poor. An adequate percentage of small loans to businesses were for amounts less than \$100 thousand.

In evaluating the bank's performance, we considered that unemployment and poverty rates may have limited lending opportunities to low-income borrowers. Based upon data obtained from the 2008-2012 ACS, the unemployment rates for Carroll, Haralson, and Heard counties were 12.0%, 14.4%, and 11.7% respectively. Based on the same data source, the poverty rates for Carroll, Haralson, and Heard counties were 13.9%, 18.9%, and 22.9% respectively.

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

Refer to Tables 8, 9 and 10 in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Home Purchase Loans***

The distribution of home purchase loans by income level of the borrower is adequate. The bank's percentage of home purchase loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The bank's percentage of home purchase loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. The bank's market share of loans to low- and moderate-income borrowers exceeded their overall market share of loans.

### ***Home Refinance Loans***

The distribution of home refinance loans by income level of the borrower in the Atlanta AA is good. The bank's percentage of home refinance loans to low-income and moderate-income borrowers is near to the percentage of those families in the AA. The bank's market share of loans to low-income borrowers

exceeded the bank's overall market share of loans. The bank's market share of loans to moderate-income borrowers is lower than the bank's overall market share.

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

Refer to Table 11 in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The distribution of small loans to businesses in the AA is very poor. The bank's percentage of loans to small businesses (businesses with gross annual revenues of \$1 million or less) is significantly lower than the percentage of small businesses in the AA. An adequate percentage of the bank's small loans to businesses were for amounts less than \$100 thousand.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the state of Georgia section of appendix D for the facts and data used to evaluate the bank's level of community development lending.

The bank made an adequate level of community development loans in the AA. During the evaluation period, Certus originated two loans totaling \$2.0 million to one organization that provides job training and education to low- and moderate-income youth. Community development lending had a neutral impact on the bank's performance in the full-scope area.

### **Product Innovation and Flexibility**

The bank made no use of innovative or flexible lending practices during the evaluation period. This had a neutral impact on the bank's lending performance in the full-scope area.

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

Based on limited-scope reviews, the bank's performance under the Lending Test in the Brunswick, Columbus, Macon, Valdosta, and Warner-Robins AAs is not inconsistent with the bank's performance in the full-scope AA. The bank's performance under the Lending Test in the Athens, Dalton, Non-MSA, and Savannah AAs is weaker than the bank's performance in the full-scope area. Performance in the Athens and Dalton AAs is weaker relative to lending activity, geographic distribution, and borrower distribution of loans. Performance in the Non-MSA AA is weaker relative to the geographic distribution of loans. Performance in the Savannah AA is weaker relative to the geographic and borrower distribution of loans. The bank's performance in the limited-scope areas had a neutral impact on the Lending Test rating.

## **INVESTMENT TEST**

### **Conclusions for Area Receiving a Full-Scope Review**

The bank's performance under the Investment Test in Georgia is rated **Needs to Improve**. Based on a full-scope review, the bank's performance in the Atlanta AA is poor relative to the capacity of the institution and the significance of the AA to the bank. Further, qualified investments were not

responsive to credit and community development needs. Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Certus made a poor level of qualified investments in the AA. The bank purchased two mortgage backed securities totaling \$392 thousand during the evaluation period. One is secured by one loan to a single moderate-income borrower, and the other is secured by a 124-unit rental housing facility that serves low- and moderate-income senior citizens in the bank's AA. The bank made no grants or in-kind donations to qualified community development organizations, and made no use of innovative or complex qualified investments.

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

Based on limited-scope reviews, the bank's performance under the Investment Test in the Athens, Brunswick, Columbus, Dalton, Non-MSA, Savannah, and Valdosta AAs is not inconsistent with the bank's performance in the full-scope area. The bank's performance under the Investment Test in the Macon and Warner-Robins AAs is stronger than the bank's overall Low Satisfactory performance under the Investment Test based on a larger dollar volume of qualified investments relative to the bank's deposits and lending activity in the AA. The bank's performance in the limited-scope areas had a neutral impact on the Investment Test rating.

## **SERVICE TEST**

### **Conclusions for Area Receiving a Full-Scope Review**

The bank's performance under the Service Test in Georgia is rated **Needs to Improve**. Based on a full-scope review, the bank's performance in the Atlanta AA is adequate.

### **Retail Banking Services**

Refer to Tables 15 and 16 in the state of Georgia section of appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Service delivery systems are accessible to geographies and individuals of different income levels. The bank operates three full service branches in the AA. All branches are located in moderate-income geographies, which exceeds the percentage of the population living within moderate-income geographies. In addition, the bank operates a deposit taking ATM at the bank's branch in Carroll County. The bank's services do not vary in a way that inconveniences the AA, particularly low- and moderate-income geographies and low- and moderate-income individuals. Certus neither opened nor closed any branches in the AA.

Banking hours and services provided Monday through Friday are supplemented through extended hours on Friday at all banking facilities. Certus offers a wide range of traditional deposit and banking products. In addition, low cost personal and business checking accounts are available. Further, Certus offers telephone banking, online banking with bill pay, and mobile banking. Since Certus could not provide specific information on how low- and moderate-income individuals have benefited from these alternative delivery services, no weight is placed on these alternative delivery systems.

## **Community Development Services**

The bank provided few community development services in the AA. During the evaluation period, one bank officer provided technical assistance to an affordable housing agency in the Atlanta AA. However, the bank reported a high volume of community activities not considered to be community development under CRA, or responsive to community needs.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Brunswick and Warner-Robins AAs is not inconsistent with performance in the full scope area. The bank's performance in the Athens, Columbus, Dalton, Macon, Non-MSA, Savannah, and Valdosta AAs, is weaker than performance in the full-scope area. Certus provided no CD services in the Athens, Columbus, Dalton, Macon, Non-MSA, and Savannah AAs. The bank provided only one CD service in the Valdosta AA and closed the branch which was located in a low-income geography.

## State Rating

### State of North Carolina

<b>CRA Rating for North Carolina:</b>	<b>Needs to Improve</b>
<b>The Lending Test is:</b>	Needs to Improve
<b>The Investment Test is rated:</b>	Low Satisfactory
<b>The Service Test is rated:</b>	Needs to Improve

#### The major factors that support this rating include:

- The geographic distribution of loans is very poor.
- The distribution of loans among individuals of different income levels is poor.
- The bank has a poor record of serving the credit needs of highly economically disadvantaged areas in its assessment areas, low-income individuals, or businesses (including farms) with gross annual revenues of \$1 million or less, consistent with safe and sound operations.
- The bank made an adequate level of qualified investments in North Carolina.
- The bank provided few community development services.

### Description of Institution's Operations in North Carolina

Certus established the Charlotte AA with the opening of a de novo branch in August 2012. The bank's mortgage operation is also based in Charlotte. The bank acquired two additional branch offices and established the Hickory AA in April of 2013.

Certus provides a full range of loan and deposit products and services. During the evaluation period, 6.2% of bank-wide deposits and 27.9% of originated loans were from the state. As of June 30, 2013, Certus held deposits totaling \$94.4 million in North Carolina, which represented a 0.03% market share. The bank ranked 81 of 111 financial institutions with operations in North Carolina. The state's largest depository institutions are Bank of American, N.A., Branch Banking and Trust Company (BB&T), and Wells Fargo Bank, N.A.

The Charlotte AA is comprised of Mecklenberg County. The Hickory AA is made up of Caldwell County. Refer to the Market Profile in appendix C for detailed demographics and other performance context information for the Charlotte AA which received a full-scope review.

### Scope of Evaluation in North Carolina

The Charlotte AA received a full-scope evaluation. The Hickory AA received a limited-scope evaluation. The ratings for the state of North Carolina were based primarily on performance in the full-scope AA. Refer to the table in appendix A for more information.

During the evaluation, we spoke with a community non-profit organization that provides a variety of services for low- and moderate-income individuals and families. The organization is located in Charlotte and serves a 46 county area in western North Carolina. Services include counseling, pregnancy support, three food pantries in the Charlotte area, and refugee resettlement. The contact identified a lack of job training as a need and stated that new jobs in the AA are either low-wage or require a combination of education and skills that many low- or moderate-income people do not possess.

## **LENDING TEST**

### **Conclusions for Area Receiving a Full-Scope Review**

The bank's performance under the Lending Test in North Carolina is rated **Needs to Improve**. Based on a full-scope review, the bank's performance in the Charlotte AA is poor.

### **Lending Activity**

Refer to Table 1 Lending Volume in the State of North Carolina section of appendix D for the facts and data used to evaluate the bank's lending activity.

Overall lending levels reflect adequate responsiveness to credit needs of the AA taking into account the number and amount of home mortgage loans originated in its AA compared to the bank's presence in the market. We identified only one small business loan originated in the Charlotte AA during the evaluation period. Only 0.9% of total bank deposits are in the Charlotte AA compared to 27.9% of total loans originated during the evaluation period. Based on 2012 HMDA Peer Mortgage Data, Certus had less than a 0.01% market share and ranked number 319 out of 494 lenders in overall home mortgage lending in the Charlotte AA. The bank had a 0.01% market share and ranked number 225 out of 337 lenders in home purchase lending in the Charlotte AA. Certus had less than 0.01% market share and ranked number 301 out of 401 lenders in home refinance lending. Certus made no home improvement loans in the Charlotte AA in 2012, the year for which comparisons were made. We identified only one small loan to a business originated in the AA during the evaluation period.

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

The overall distribution of loans by income level of the geography is very poor. The geographic distribution of home mortgage loans is very poor. The small business loan sample contained only one loan in the Charlotte AA, therefore, we did not conclude on the geographic distribution of small loans to businesses. There are no market share comparisons. The bank made too few home mortgage loans in the AA in 2012 against which to make comparisons.

In evaluating performance, we considered that owner-occupied units in low-income geographies comprised only 5.2% of total units in the AA.

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

Refer to Tables 2, 3, 4 and 5 in the state of North Carolina section, appendix D, for facts and data used to evaluate geographic distribution of the bank's home-mortgage loan originations/purchases.

### ***Home Purchase Loans***

The geographic distribution of home purchase loans in the Charlotte AA is poor. The bank's percentage of home purchase loans in low-income geographies is lower than the percentage of owner-occupied units in low-income geographies. The bank's percentage of home purchase loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied units in moderate-income geographies.



### ***Home Improvement Loans***

The geographic distribution of home improvement loans in the Charlotte AA is poor. The bank made no home improvement loans in low-income geographies. The bank's percentage of home refinance loans in moderate-income geographies is lower than the percentage of owner-occupied units in those geographies.

### ***Home Refinance Loans***

The geographic distribution of home refinance loans is very poor. The bank's percentage of home refinance loans in low-income and moderate-income geographies is significantly lower than the percentage of owner-occupied units in those geographies.

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

We evaluated the lending distribution in this AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were made to the geographies in the AA. We considered loan distributions, branch locations, competition, market conditions, demographic information, and bank capacity and restraints during the evaluation period. We identified gaps in lending in low- and moderate-income geographies in the Charlotte AA during the evaluation period. This had a negative impact on our conclusion regarding the bank's performance in the full-scope area.

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

The overall distribution of loans by borrower income level in the AA is poor. The distribution of home mortgage loans by borrower income level is poor. The small business loan sample contained only one loan in the Charlotte AA, therefore, we did not conclude on the borrower distribution of loans to small businesses (businesses with gross annual revenue of \$1 million or less). The bank made too few home mortgage loans in the AA in 2012 against which to make market share comparisons.

We considered that, based on the 2008-2012 ACS, the unemployment rate in the Charlotte AA was 9.3% and the poverty rate was 10.9%.

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

Refer to Tables 8, 9, and 10 in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Home Purchase Loans***

The distribution of home purchase loans by income level of the borrower in the Charlotte AA is adequate. The bank's percentage of home purchase loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The bank's percentage of home purchase loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA.

### ***Home Improvement Loans***

The distribution of home improvement loans by income level of the borrower in the Charlotte AA is very poor for low- and moderate-income families. The bank made no home improvement loans to low- or moderate-income borrowers in the Charlotte AA.

### ***Home Refinance Loans***

The distribution of home refinance loans by income level of the borrower in the Charlotte AA is very poor. The bank's percentage of home refinance loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The bank's percentage of home refinance loans to moderate-income borrowers is lower than the percentage of moderate-income families in the AA.

### **Community Development Lending**

Refer to Table 1 Lending Volume in appendix D for the facts and data used to evaluate the bank's level of community development lending.

Certus made a relatively high level of community development loans in the Charlotte AA, considering the bank's presence in the market. The bank made three community development loans during the evaluation period totaling \$1.5 million. Two loans provided 60 units of affordable housing for low- and moderate-income residents in the area. One loan supported an organization that provides health services for low- and moderate-income residents. This had a positive impact on the bank's performance in the full-scope area.

### **Product Innovation and Flexibility**

The bank made no use of innovative or flexible lending practices during the evaluation period. This had a neutral impact on the bank's performance in the full-scope area.

### **Conclusions for Area Receiving a Limited-Scope Review**

Based on a limited-scope review, the bank's overall performance under the Lending Test in the Hickory AA is stronger than the bank's performance in the full-scope area relative to the geographic distribution of loans and the distribution of loans by borrower income. The bank made few loans and no community development loans in the Hickory AA, however the bank operated in the AA for just over one year prior to the onset of this evaluation. Because the volume of lending in the full-scope area was significantly larger than in the limited scope area, performance in the limited scope area had a neutral impact on the Lending Test rating.

## **INVESTMENT TEST**

### **Conclusions for Area Receiving a Full-Scope Review**

The bank's performance under the Investment Test in North Carolina is rated **Low Satisfactory**. Based on a full-scope review, the bank had a significant level of qualified investments in the Charlotte AA. Investments exhibited adequate responsiveness to credit and community development needs in the

Charlotte AA. The institution made no use of innovative or complex investments. Refer to Table 14 in appendix C for the facts and data used to evaluate the bank's level of qualified investments.

Certus made 12 qualified investments totaling \$2.0 million in the Charlotte AA. One investment supported small business development. Two investments supported affordable housing, one of which created 73 units for low- and moderate-income residents. The bank made no grants or in-kind donations to nonprofit organizations during the evaluation period.

### **Conclusions for Area Receiving Limited-Scope Reviews**

Based on a limited-scope review, the bank's performance under the Investment Test in the Hickory AA is weaker than the bank's overall performance in the full-scope area. Deposits in the Hickory AA account for 96.9% of total deposits in North Carolina, however Certus made no investments, grants, or donations in the limited-scope area. This had a negative impact on the bank's overall Investment Test rating. Refer to Table 14 in the state of North Carolina section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

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

The bank's performance under the Service Test in North Carolina is rated **Needs to Improve**. Based on a full-scope review, the bank's performance in the Charlotte AA is poor.

### **Retail Banking Services**

Refer to Tables 15 and 16 in the state of North Carolina section of appendix D for facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Service delivery systems are reasonably accessible to geographies and individuals of different incomes in the AA. Certus operates one full service branch office located in an upper-income geography and three non-deposit-taking ATMs in the AA, one of which is located in a moderate-income geography. Certus offers traditional deposit and banking products including low-cost checking and savings accounts. There are no services targeted to low- or moderate-income individuals. The bank offers telephone banking, online banking with bill pay, and mobile banking, however, no specific information was provided to demonstrate whether these alternative delivery systems are effective in reaching low- or moderate-income individuals.

To the extent changes have been made, the bank's opening and closing of branches has not negatively affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. Certus opened one branch in the South Park area of Charlotte in August 2012.

### **Community Development Services**

The bank provided few community development services in the AA. One bank officer provided technical assistance to a nonprofit organization that provides business attire to low-income women seeking employment.

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

Based on a limited-scope review, the bank's performance under the Service Test in the Hickory AA is weaker than the bank's overall performance in the full-scope AA. Certus provided no community development services in the AA during the evaluation period. The bank's performance in the limited-scope area had a negative impact on the Service Test rating.

## State Rating

### State of South Carolina

<b>CRA Rating for South Carolina:</b>	<b>Satisfactory</b>
<b>The Lending Test is rated:</b>	Low Satisfactory
<b>The Investment Test is rated:</b>	High Satisfactory
<b>The Service Test is rated:</b>	Low Satisfactory

#### **The major factors that support this rating include:**

- The bank demonstrated adequate responsiveness to credit needs in South Carolina.
- The distribution of loans to individuals of different income levels is adequate.
- The distribution of loans to businesses of different sizes is excellent.
- The bank made an adequate level of qualified investments.
- The bank provided an significant level of community development services.
- Its service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AAs.

### **Description of Institution's Operations in South Carolina**

Certus has ten branch offices in five AAs in South Carolina. The Anderson, Greenville, and Spartanburg AAs were established with the January 2011 acquisitions. The bank established the Columbia and Charleston AAs in March 2014 with the opening of one de novo branch office in each location. The bank also opened two de novo branches in Greenville in April and December of 2013. Certus has six deposit-taking ATMs in South Carolina; one each in Charleston and Columbia, three in Greenville, and one in Spartanburg.

Certus provides a full range of loan and deposit products and services. During the evaluation period, 27.6% of bank-wide deposits and 43.2% of originated loans were from the state. As of June 30, 2013, Certus held deposits totaling \$423.0 million in South Carolina, which represented a 0.6% market share and ranked the bank 23<sup>rd</sup> of 93 financial institutions with operations in South Carolina. The bank's largest competitors in the state are Wells Fargo Bank, N.A., Bank of America, N.A., BB&T, and First Citizens Bank and Trust Company, Inc.

The most significant AA in the state, in terms of lending and deposits is the Greenville AA, which is comprised of Greenville and Pickens counties. This AA is home to six branches, and accounts for approximately 81.5% of rated area deposits and 76.7 % of rated area loans originated during the evaluation period. The Anderson AA is comprised of Anderson County. The AA is home to one branch and accounts for 5.8% of rated area deposits and approximately 7.7% of rated area loans originated during the evaluation period. The Spartanburg AA is comprised of Spartanburg County. The bank operates one branch in the AA. Deposits represent 12.7% of total rated area deposits and loans represent 15.6% of total loans originated in the state during the evaluation period.

Refer to the Market Profile in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

## **Scope of Evaluation in South Carolina**

The Greenville AA received a full-scope evaluation. The Anderson and Spartanburg AAs received limited-scope evaluations. The ratings for the state of South Carolina are primarily based on the results of the area receiving a full-scope review, but were influenced by performance in the limited scope areas. Refer to the table in appendix A for more information.

Two community contacts were made during this evaluation. We spoke with representatives from a community development financial institution and a community service organization. Both indicated a need for workforce readiness and development programs and for funding that supports education programs, financial stability programs, and affordable housing.

## **LENDING TEST**

### **Conclusions for Areas Receiving a Full-Scope Review**

The bank's performance under the Lending Test in South Carolina is rated **Low Satisfactory**. Based on a full-scope review, the bank's performance in the Greenville AA is adequate.

### **Lending Activity**

Refer to Table 1 Lending Volume in the state of South Carolina section of appendix D for the facts and data used to evaluate the bank's lending activity.

Overall lending levels reflect adequate responsiveness to credit needs of the AA, taking into account the number and amount of home mortgage and small business loans originated in its full-scope AA.

As of June 30, 2013, the bank ranked number 11 with a 3.2% market share of deposits among 33 depository institutions in the AA. Based on 2012 HMDA Peer Mortgage Data, the bank ranked number 32 among 362 HMDA reporters with a 0.6% overall market share of home mortgage loans. The bank ranked number 44 among 345 HMDA reporters with a 0.4% market share of home refinance loans. Certus ranked number 28 among 276 HMDA reporters with a 0.7% market share of home purchase loans. Certus made no home improvement loans in the AA during 2012, the year for which market share comparisons are made.

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

The overall distribution of loans by income level of the geography is poor. The geographic distribution of home mortgage loans is poor. The geographic distribution of small loans to businesses is adequate.

We considered that only 3.4% of owner-occupied single family housing units and 5.1% of businesses were located in low-income geographies.

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

Refer to Tables 2, 3, 4 and 5 in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

### ***Home Purchase Loans***

The geographic distribution of home purchase loans in the Greenville AA is poor. The bank's percentage of home purchase loans in low-income geographies is significantly lower than the percentage of owner-occupied units in low-income geographies. The bank's percentage of home purchase loans in moderate-income geographies is somewhat lower than the percentage of owner-occupied units in moderate-income geographies. The bank made no home purchase loans in low-income geographies in 2012. The bank's market share of home purchase loans in moderate-income geographies is somewhat lower than their overall market share of home purchase loans in the AA.

### ***Home Improvement Loans***

The geographic distribution of home improvement loans in the Greenville AA is good. The bank's percentage of home improvement loans in low-income geographies is significantly lower than the percentage of owner-occupied units in low-income geographies. The bank's percentage of home improvement loans in moderate-income geographies exceeded the percentage of owner-occupied units in moderate-income geographies. The bank made no home improvement loans in 2012, the year for which comparisons are made.

### ***Home Refinance Loans***

The geographic distribution of home refinance loans in the Greenville AA is poor. The bank's percentage of home refinance loans in low-income geographies is significantly lower than the percentage of owner-occupied units in low-income geographies. The bank's percentage of home refinance loans in moderate-income geographies is lower than the percentage of owner-occupied units in the moderate-income geographies. The bank's market share of home refinance loans in low-income and moderate-income geographies exceeded their overall market share of home refinance loans in the AA.

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

Refer to Table 6 in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is adequate. The bank made no loans in low-income geographies, however only 5.1% of businesses were located in those geographies. The percentage of small loans to businesses in moderate-income geographies is somewhat lower than to the percentage of businesses located in moderate-income geographies.

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

We evaluated the lending distribution in this AA to determine if any unexplained conspicuous gaps existed. We used reports and maps to compare the geographies where loans were made to the geographies in the AA. We considered loan distributions, branch locations, competition, market conditions, and demographic information. No unexplained conspicuous gaps were identified. This had a neutral impact on our conclusion regarding the bank's geographic distribution of loans.

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

The overall distribution of loans by income level of the borrower in the Greenville AA is adequate. The distribution of home mortgage loans by borrower income level is adequate. The distribution of loans to small businesses (businesses with less than \$1 million in gross annual revenue) is excellent. A poor percentage of small loans to businesses were for amounts less than \$100 thousand.

In evaluating the borrower distribution of home mortgage loans, we considered the level of unemployment and poverty rates among AA residents. Based upon data obtained from the 2008-2012 ACS, the unemployment rates for Greenville and Pickens counties were 9.2% and 11.5% respectively. Based on the same data source, the poverty rates for Greenville and Pickens counties were 11.6% and 10.0% respectively.

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

Refer to Tables 8, 9 and 10 in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

### ***Home Purchase Loans***

The distribution of home purchase loans by income level of the borrower in the AA is adequate. The bank's percentage of home purchase loans to low-income borrowers is significantly lower than the percentage of low-income families in the AA. The bank's percentage of home purchase loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. The bank's market share of loans to low-income borrowers is somewhat lower than their overall market share of loans. The bank's market share of loans to moderate-income borrowers exceeded their overall market share of loans.

### ***Home Improvement Loans***

The distribution of home improvement loans by income level of the borrower in the AA is adequate. The bank made no home improvement loans to low-income borrowers. The bank's percentage of home improvement loans to moderate-income borrowers exceeded the percentage of moderate-income families in the AA. The bank made no home improvement loans in 2012, the year for which comparisons were made.

### ***Home Refinance Loans***

The distribution of home refinance loans by income level of the borrower in the AA is very poor. The bank's percentage of home refinance loans to low-income and moderate-income borrowers is significantly lower than the percentage of those borrowers in the AA. The bank's market share of loans to low-income borrowers exceeded the bank's overall market share of loans. The bank's market share of loans to moderate-income borrowers is significantly lower than their overall market share of loans.

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

Refer to Table 11 in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.



The distribution of small loans to businesses in the AA is excellent. The bank's percentage of loans to small businesses (businesses with gross annual revenues of \$1 million or less) exceeded the percentage of small businesses in the AA. An adequate percentage of the bank's small loans to businesses were for amounts less than \$100 thousand.

### **Community Development Lending**

Refer to Table 1 Lending Volume in the state of South Carolina section of appendix D for the facts and data used to evaluate the bank's level of community development lending.

The bank made a low level of community development loans in the AA, which had a neutral impact on the overall lending performance rating. During the evaluation period, Certus originated one loan for \$1.5 million to a non-profit organization that provides housing for low- to moderate-income seniors.

### **Product Innovation and Flexibility**

The bank made no use of innovative or flexible lending practices during the evaluation period. This had a neutral impact on the bank's lending performance in the full-scope area.

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

Based on limited-scope reviews, the bank's performance in the Spartanburg AA is not inconsistent with than the bank's overall performance in the full-scope area. The bank's performance in the Anderson AA is weaker than the bank's overall performance in the full-scope AA due to poor distribution of loans by income of the geography. This had a neutral impact on the bank's overall Lending Test rating.

Refer to the Tables 1 through 11 in the state of South Carolina section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

### **Conclusions for Areas Receiving a Full-Scope Review**

The bank's performance under the Investment Test in South Carolina is rated **High Satisfactory**. Based on a full-scope review, the bank's performance in the Greenville AA is good.

Refer to Table 14 in the state of South Carolina section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Certus made a significant level of qualified investments in the Greenville AA and in the broader statewide area that includes and serves the AA. The bank made one investment of \$774 thousand related to a 120 unit multifamily housing complex for low- and moderate-income families in Greenville. In addition, the bank made four investments totaling \$2.7 million in state mortgage revenue bonds that support affordable housing across the state, including the bank's AAs.

The bank exhibited good responsiveness to community development needs. The bank made investments that support needs identified and discussed in the Market Profile section in appendix C for the Greenville AA

## **Conclusions for Area Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Anderson and Spartanburg AAs is not inconsistent with the bank's overall High Satisfactory performance in the full-scope area. This had a neutral impact on the bank's overall performance under the Investment Test. Refer to Table 14 in the state of South Carolina section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

### **Conclusions for Areas Receiving a Full-Scope Review**

The bank's performance under the Service Test in South Carolina is rated **Low Satisfactory**. Based on a full-scope review, the bank's performance in the Greenville AA is adequate.

### **Retail Banking Services**

Refer to Table 15 in the state of South Carolina section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AA. Certus has six branches in the AA of which five are located in upper-income geographies and one is in a middle-income geography.

The bank's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems. Certus closed no branches and opened two new branches in upper-income geographies during the evaluation period.

The bank's products, services and business hours do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and low- and moderate-income individuals.

### **Community Development Services**

The bank provides an adequate level of community development services. Officers and staff provided services to nine community development organizations in the AA during the evaluation period. Bank staff provided financial literacy training to low-income students, participated on an advisory committee for a local community land trust that serves low-income communities, served on a steering committee for a nonprofit developing a low-income credit union, and serving on the board of an organization that promotes education, job training, and employment for low-income individuals.

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

Based on limited-scope reviews, the bank's performance under the Service Test in the Spartanburg AAs is not inconsistent with the bank's overall Low Satisfactory performance in the full scope AA. The bank's performance in the Anderson AA is weaker than the bank's performance in the full scope area. This had a neutral impact on the bank's overall performance under the Service Test. Refer to Table 13 in the state of South Carolina section of appendix D for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and 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 (excludes CD Loans): 1/1/2012 to 12/31/2013 Investment and Service Tests and CD Loans: 1/22/2011 to 5/5/2014	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
CertusBank, National Association (Certus) Greenville, SC	Home Mortgage, Small Business, and Community Development Loans Retail and Community Development Services Qualified Investments	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Assessment Area</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>Florida</b> Jacksonville	Full-scope	Duval and St. Johns counties
<b>Georgia</b> Athens	Limited-scope	Oconee County
Atlanta	Full-scope	Carroll, Heard, and Haralson counties
Brunswick	Limited-scope	Glynn and McIntosh counties
Columbus	Limited-scope	Muscogee County
Dalton	Limited-scope	Whitfield County
Macon	Limited-scope	Bibb and Crawford counties
Non-MSA	Limited-scope	Banks, Greene, Habersham, Jackson, and Peach counties
Savannah	Limited-scope	Chatham and Effingham counties
Valdosta	Limited-scope	Lowndes County
Warner Robins	Limited-scope	Houston County
<b>North Carolina</b> Charlotte	Full-scope	Mecklenburg County
Hickory-Lenoir	Limited-scope	Caldwell County
<b>South Carolina</b> Anderson	Limited-scope	Anderson County
Charleston	<i>Not evaluated</i>	Charleston County
Columbia	<i>Not evaluated</i>	Richland County
Greenville	Full-scope	Greenville and Pickens counties
Spartanburg	Limited-scope	Spartanburg County

## Appendix B: Summary of State Ratings

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RATINGS BANK NAME				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State Rating
CertusBank N.A.	Satisfactory	Needs to Improve	Needs to Improve	Needs to Improve
State:				
Florida	Substantial Noncompliance	High Satisfactory	Needs to Improve	Needs to Improve
Georgia	Low Satisfactory	Needs to Improve	Needs to Improve	Needs to Improve
North Carolina	Needs to Improve	Low Satisfactory	Low Satisfactory	Needs to Improve
South Carolina	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

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

### State of Florida Full-Scope Area

#### Jacksonville

Demographic Information For Full Scope Area: Jacksonville AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	214	7.94	25.70	37.38	28.04	0.93
Population By Geography	1,054,302	5.85	22.33	39.57	32.25	0.00
Owner-Occupied Housing By Geography	262,591	3.77	18.43	40.95	36.85	0.00
Business By Geography	147,451	4.29	22.21	37.38	36.12	0.00
Farms By Geography	3,263	3.80	18.97	42.87	34.35	0.00
Family Distribution By Income Level	256,497	21.60	17.57	21.28	39.55	0.00
Distribution Of Low And Moderate Income Families Throughout AA Geographies	100,459	10.16	32.34	40.80	16.70	0.00
Median Family Income		63,927	Median Housing Value		212,021	
FFIEC Adjusted Median Family Income For 2013		63,200	Unemployment Rate (2010 US Census)		4.28%	
Households Below Poverty Level		13%				

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

Source: 2010 U.S. Census, and 2013 FFIEC Adjusted Median Family Income

Certus has one AA in Florida comprised of Duval and St. Johns counties. The bank operates three branches in the Jacksonville AA, two of which are located in Duval County and one in St. John's County.

As of June 30, 2013, Certus had a 0.1% deposit market share in Duval County and ranked number 21 of 31 depository institutions. Bank of America, N.A., Everbank, and Wells Fargo Bank, N.A. are the top three competitors with 44.9%, 28.3%, and 10.3% deposit market share respectively.

According to Moody's Analytics, the top five employers in Jacksonville are the Naval Air Station in Jacksonville, Mayport Naval Station, Publix Supermarkets, the Baptist Health System, and Bank of America Merrill Lynch. The region has historically been dependent on defense spending for growth, however, continued pressure to cut defense spending may reduce this as a source of continued growth in the future.

The US Census Bureau estimates the 2013 population of Duval County to be 885,855. The Census bureau states that the percentage of persons below poverty in that county from 2008-2012 was 15.8%. According to the US Bureau of Labor Statistics, the annual unemployment rate for 2013 (not seasonally adjusted) was 7.4%.

As part of our review of the Jacksonville market area, we contacted an affordable housing provider to gain a better understanding of the credit needs and condition of the community. The organization's primary service area is Mayport, Neptune Beach, Atlantic Beach, and Jacksonville Beach in the

suburban Jacksonville area, as well as a portion of Ponte Vedra beach in northern St. Johns county. The Mayport road corridor in Atlantic Beach has a high poverty rate, few home ownership opportunities, and limited social services due to the natural barrier of the intercostal waterway. The contact stated that there were many opportunities for financial institutions to be involved in the local community.

# State of Georgia Full-Scope Area

## Atlanta AA

Demographic Information For Full Scope Area: Atlanta AA						
Demographic characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	25	4.00	68.00	28.00	0.00	0.00
Population by Geography	151,141	1.93	65.40	32.67	0.00	0.00
Owner-Occupied Housing by Geography	37,744	0.58	63.57	35.85	0.00	0.00
Business by Geography	11,680	1.58	66.16	32.26	0.00	0.00
Farms by Geography	436	0.46	69.27	30.28	0.00	0.00
Family Distribution by Income Level	38,766	30.68	22.08	20.70	26.54	0.00
Distribution of Low and Moderate Income Families Throughout AA Geographies	20,453	2.62	71.79	25.59	0.00	0.00
Median Family Income		67,829	Median Housing Value		131,856	
FFIEC Adjusted Median Family Income for 2013		66,300	Unemployment Rate (2010 US Census)		5.32%	
Households Below Poverty Level		18%				

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

Source: 2010 U.S. Census, and 2013 FFIEC Adjusted Median Family Income

Certus’s Atlanta AA area is comprised of the complete counties of Carroll, Haralson, and Heard. Certus entered this market in May 2011, through the acquisition of two failed banks; First Georgia Banking Company headquartered in Franklin, Georgia, and Atlantic Southern Bank, headquartered in Macon, Georgia. Certus serves the AA through three full-service branches in the cities of Carroll, Bremen, and Franklin.

Based on June 30, 2013 FDIC Summary of Deposits data, Certus ranks number 4 out of 11 financial institutions for its market share of deposits and has 12.1% of the total deposits in the AA. Banking competition is very strong for both loans and deposits in the MSA. The top three banking competitors in the AA are Community Southern Bank, which ranked number one in deposit share (28.8%) with seven offices, Branch Banking and Trust (BB&T) which ranked number two in market share of deposits (16.5%) with five offices, and Synovus Bank, which ranked number three in deposit share (16.5%) with seven offices.

Based on information from the Carroll County Government, major employers include Carroll County Schools, Tanner Health System, Southwire, and the University of West Georgia. Information obtained from the Haralson Count Development Authority indicates major employers in Haralson County are Honda, Honda Precision Parts, Haralson School District, and Tyden Brooks. Based upon information from the Georgia Department of Labor, the largest employers in Heard County are BE & K Construction Company, Franklin Aluminum Company, and GE International.

Based upon data obtained from the 2008-2012 ACS, the unemployment rates for Carroll, Haralson, and Heard counties were 12.0%, 14.4%, and 11.7% respectively. Based on the same data source, the poverty rates for Carroll, Haralson, and Heard counties were 13.9%, 18.9%, and 22.9% respectively. This rate is higher than the 2013 Georgia unemployment rate of 8.2 percent. Based upon data from the ACS 2008-2012, the weighted average individual poverty rate for the AA was 17.92%. In comparison, the individual poverty rate for the state of Georgia was 17.4%.

During our examination, we contacted a community non-profit housing organization serving Carroll County. This contact indicated the area needs affordable housing for LMI individuals. While there is an adequate supply of housing in area, the contact indicated most homes are not affordable for low-income individuals. Further, the contact indicated that poor credit is the biggest obstacle for low-income individuals in obtaining mortgage loans.



# State of North Carolina Full-Scope Area

## Charlotte

Demographic Information for Full Scope Area: Charlotte						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	233	13.73	23.18	21.89	39.48	1.72
Population by Geography	919,628	10.72	22.75	23.62	42.87	0.04
Owner-Occupied Housing by Geography	219,296	5.19	18.04	24.78	51.96	0.02
Business by Geography	100,641	9.73	16.83	21.07	50.67	1.70
Farms by Geography	1,571	9.42	18.78	25.59	45.70	0.51
Family Distribution by Income Level	218,847	20.80	16.63	19.50	43.07	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	81,914	19.70	35.05	23.70	21.54	0.00
Median Family Income		64,787	Median Housing Value	212,817		
FFIEC Adjusted Median Family Income for 2013		64,100	Unemployment Rate (2010	4.76%		
Households Below Poverty Level		11%	US Census)			

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

Source: 2010 US Census and 2013 FFIEC Adjusted Median Family Income

Certus has one branch in the Charlotte AA which is comprised of Mecklenburg County. There are three ATMs in the AA. The first is located inside the Sharon Road branch and the other two are non-deposit taking ATMS located in Costco stores.

Based on June 30, 2013 FDIC Summary of Deposits data, Certus ranks number 24 of 27 financial institutions in the AA with a 0.0% market share of the total deposits in the AA. The top three banking competitors in the AA are Bank of America, N.A., which ranked number one in deposit share (81.4%) with 37 offices, Wells Fargo Bank, N.A., which ranked number two in market share of deposits (14.0%) with 52 offices, and BB&T, which ranked number three in deposit share (1.6%) with seven offices.

According to Moody's Analytics, economic conditions in the Charlotte AA are improving while moderate economic obstacles remain. The unemployment rate for the city of Charlotte is 8.7 percent through November 2013, down from a high of 11.7 percent in 2011. The unemployment rate in the AA was 10.9% based on the 2008-2012 ACS data. Unemployment declined due to positive trends in the housing market and increased openings in the leisure/hospitality sector. However, the employment situation remains challenging. While the majority of job creation was in leisure and hospitality areas, most new jobs in this sector are relatively low-wage. Uncertainty remains in the financial sector. Job growth in 2013 was relatively flat as financial institutions continue to undergo re-structuring. The report notes the AA's short and long-term outlook is positive. The AA benefits from low business costs, robust population growth, a highly educated workforce, and diversified economy. Challenges to the AA include re-structuring in the financial sector and cyclical job market.

During the evaluation, we spoke with a community non-profit charitable organization that provides a variety of services for low- and moderate-income individuals and families. The organization is located in Charlotte and serves a 46 county area in western North Carolina. Services include counseling, pregnancy support, three food pantries in the Charlotte area, and refugee resettlement. We discussed economic conditions and barriers to economic development in the Charlotte AA.

# State of South Carolina Full-Scope Area

## Greenville, SC

Demographic Information for Full-Scope Area: Greenville, SC						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	139	8.63%	22.30%	41.01%	28.06%	0.00
Population by Geography	570,449	5.47%	18.31%	44.26%	31.95%	0.00
Owner-Occupied Housing by Geography	147,506	3.37%	14.95%	47.78%	33.91%	0.00
Businesses by Geography	44,218	5.06%	17.99%	38.18%	38.77%	0.00
Farms by Geography	940	3.19%	14.57%	52.55%	29.68%	0.00
Family Distribution by Income Level	142,040	21.03%	17.20%	19.11%	42.67%	0.00
Distribution of Low- and Moderate-Income Families throughout AA Geographies	54,297	10.18%	26.72%	46.03%	17.06%	0.00
Median Family Income		56,013	Median Housing Value			145,122
FFIEC Adjusted Median Family Income for 2013		58,000	Unemployment Rate			4.09%
Households Below Poverty Level		14%	(2010 US Census)			

(\*) The NA category consists of geographies that have not been assigned an income classification.  
 Source: 2010 U.S. Census, and 2013 FFIEC Adjusted Median Family Income.

The Greenville AA is comprised of Pickens and Greenville counties. Certus is headquartered in Greenville, SC, which is located in Greenville County.

Certus has five locations in the AA. As of June 30, 2013, Certus had a 3.2% deposit market share in the AA and is ranked number 11 out of 33. Its three major competitors are Wells Fargo Bank, N.A., which ranked number one in deposit market share (17.3%) with 22 offices, BB&T, which ranked number two in deposit share (14.0%) with 22 offices, and Bank of America, N.A., which number three in deposit share (13.8) with 17 offices.

According to the U.S. Bureau of Labor and Statistics, the 2013 annual unemployment rate was 6.1%, a decrease from 7.3% in 2012. According to the ACS, the 2008-2012 percentage of persons below poverty level was 15.9%, compared to a state poverty rate of 17.6%.

Manufacturing, warehouse/distributors, and engineering operations are prominent industries in the region. Major employers in the area include the Greenville Health System, BMW, Michelin, Clemson University, GE Energy, Fluor Corporation, and Lockheed Martin.

Greenville County is the largest public school system in the district. The area has more than a dozen higher learning institutions, including Furman University, Bob Jones University, and Clemson University.

Two community contacts were made during this evaluation. We spoke with representatives from a community development financial institution and a community service organization. Both indicated a

need for workforce readiness and development programs and for funding that supports education programs, financial stability programs, and affordable housing.

## Appendix D: 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: (1) 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; (2) Partially geocoded loans (loans where no census tract is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13. Tables without data are not included in this PE. [Note: Do not renumber the tables.]

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. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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

**Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

**Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

**Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

**Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

**Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.

**Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.

**Table 10. Borrower Distribution of Refinance Loans** - See Table 8.

**Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.

**Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

**Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL)** - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

**Table 14. Qualified Investments** - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As \_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

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

**Table 1. Lending Volume**

Lending Volume		Geography: State Of Florida				Evaluation Period: January 1, 2012 To December 31, 2013						
Assessment Area (2012):	% 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>												
Jacksonville	100.00	4	751	4	644	0	0	0	0	8	1,395	100.00

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

Geographic Distribution: Home Purchase		Geography: State Of Florida				Evaluation Period: January 1, 2012 To December 31, 2013									
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>															
Jacksonville	0	0.00	3.77	0.00	18.43	0.00	40.95	0.00	36.85	0.00	0.00	0.00	0.00	0.00	0.00

\* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2013.

\*\*\* Deposit Data as of June 30, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Geographic Distribution: Home Improvement			Geography: State Of Florida				Evaluation Period: January 1, 2012 To December 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% 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>																
Jacksonville	2	100.00	3.77	0.00	18.43	0.00	40.95	50.00	36.85	50.00	0.00	0.00	0.00	0.00	0.00	

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

Geographic Distribution: Home Mortgage Refinance			Geography: State Of Florida				Evaluation Period: January 1, 2012 To December 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% 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>																
Jacksonville	2	100.00	3.77	0.00	18.43	0.00	40.95	50.00	36.85	50.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



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

Geographic Distribution: Small Loans To Businesses		Geography: State Of Florida								Evaluation Period: January 1, 2012 To December 31, 2013					
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Jacksonville	4	0.00	4.33	0.00	22.49	50.00	36.93	0.00	36.24	50.00	0.00	0.00	0.00	0.00	0.00

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

Borrower Distribution: Home Purchase		Geography: State Of Florida								Evaluation Period: January 1, 2012 To December 31, 2013					
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>1</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Jacksonville	0	0.00	21.60	0.00	17.57	0.00	21.28	0.00	39.55	0.00	0.00	0.00	0.00	0.00	0.00

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

\*\*\* Source Data - Dun and Bradstreet (2012).

\* Based on 2012 Peer Mortgage Data (USPR)

\*\* 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 Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

<sup>1</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: Home Improvement			Geography: State Of Florida						Evaluation Period: January 1, 2012 To December 31, 2013						
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>2</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>															
Jacksonville	2	100.00	21.60	0.00	17.57	0.00	21.28	50.00	39.55	50.00	0.00	0.00	0.00	0.00	0.00

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

Borrower Distribution: Home Mortgage Refinance			Geography: State Of Florida						Evaluation Period: January 1, 2012 To December 31, 2013						
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>3</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>															
Jacksonville	2	100.00	21.60	0.00	17.57	0.00	21.28	0.00	39.55	100.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

2 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

3 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: Small Loans To Businesses		Geography: State Of Florida			Evaluation Period: January 1, 2012 To December 31, 2013				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses**	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Jacksonville	4	100.00	74.54	75.00	50.00	25.00	25.00	0.00	0.00

**Table 14. Qualified Investments**

Qualified Investments		Geography: State Of Florida			Evaluation Period: January 22, 2011 To May 5, 2014				
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>									
Jacksonville	0	0	6	3,000	6	3,000	100.00	0	0

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2012).

\*\*\*\* 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 0.00% of small loans to businesses originated and purchased by the bank.

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

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

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

Distribution Of Branch Delivery System And Branch Openings/Closings														Geography: State Of Florida				Evaluation Period: January 22, 2011 To May 5, 2014			
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>																					
Jacksonville	100.00	3	100.00	0.00	0.00	0.00	100.00	2	0	0	0	0	+2	5.85	22.33	39.57	32.25				

**Distribution of Branch and ATM Delivery System**

Distribution Of Branch And ATM Delivery System														Geography: State Of Florida				Evaluation Period: January 22, 2011 To May 5, 2014			
MA/Assessment Area:	Deposits	Branches						ATMs						Population							
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography							
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp				
<b>Full Review:</b>																					
Jacksonville	100.00	3	100.00	0	0	0	100.00	4	100.00	0	0	1	3	5.85	22.33	39.57	32.25				

**Table 1. Lending Volume**

Lending Volume		Geography: State Of Georgia						Evaluation Period: January 1, 2012 To December 31, 2013				
Assessment Area (2012):	% 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	32.52	102	9,358	30	2,877	0	0	2	2,041	134	14,276	26.36
<b>Limited Review:</b>												
Athens	0.97	4	1,153	0	0	0	0	0	0	4	1,153	3.50
Brunswick	6.07	25	3,337	0	0	0	0	0	0	25	3,337	3.46
Columbus	4.13	14	1,489	3	172	0	0	0	0	17	1,661	9.72
Dalton	1.46	6	1,557	0	0	0	0	0	0	6	1,557	2.97
Macon	18.20	60	7,710	14	2,905	0	0	1	50	75	10,665	17.78
Non-MSA	17.23	63	9,638	8	674	0	0	0	0	71	10,312	24.91
Savannah	9.22	35	6,638	3	270	0	0	0	0	38	6,908	5.08
Valdosta	4.13	16	2,137	1	60	0	0	0	0	17	2,197	0.39
Warner-Robins	6.07	24	3,725	1	9	0	0	0	0	25	3,734	5.83

\* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2013.

\*\*\* Deposit Data as of June 30, 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: Home Purchase		Geography: State Of Georgia									Evaluation Period: January 1, 2012 To December 31, 2013				
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	9	17.31	0.58	0.00	63.57	88.89	35.85	11.11	0.00	0.00	0.12	0.00	0.22	0.00	0.00
<b>Limited Review:</b>															
Athens	1	1.92	0.00	0.00	0.00	0.00	7.36	0.00	92.64	100.00	0.00	0.00	0.00	0.00	0.00
Brunswick	2	3.85	0.00	0.00	15.72	0.00	50.29	50.00	33.99	50.00	0.15	0.00	0.00	0.18	0.14
Columbus	2	3.85	3.14	0.00	18.38	50.00	36.91	50.00	41.57	0.00	0.00	0.00	0.00	0.00	0.00
Dalton	1	1.92	2.15	0.00	9.35	0.00	49.68	100.00	38.82	0.00	0.11	0.00	0.00	0.22	0.00
Macon	11	21.15	7.75	9.09	19.88	9.09	30.60	27.27	41.77	54.55	0.48	0.00	0.00	0.58	0.51
Non-MSA	7	13.46	0.00	0.00	3.81	0.00	58.03	42.86	38.16	57.14	0.21	0.00	0.00	0.21	0.21
Savannah	8	15.38	4.70	12.50	17.53	12.50	38.37	37.50	39.39	37.50	0.02	0.00	0.00	0.05	0.00
Valdosta	4	7.69	3.79	0.00	18.66	50.00	27.71	25.00	49.84	25.00	0.00	0.00	0.00	0.00	0.00
Warner-Robins	7	13.46	3.95	0.00	22.10	14.29	40.21	28.57	33.74	57.14	0.21	0.00	0.29	0.23	0.17

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Geographic Distribution: Home Improvement		Geography: State Of Georgia					Evaluation Period: January 1, 2012 To December 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans						
<b>Full Review:</b>																
Atlanta	0	0.00	0.58	0.00	63.57	0.00	35.85	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Athens	0	0.00	0.00	0.00	0.00	0.00	7.36	0.00	92.64	0.00	0.00	0.00	0.00	0.00	0.00	
Brunswick	1	14.29	0.00	0.00	15.72	100.00	50.29	0.00	33.99	0.00	0.91	0.00	6.67	0.00	0.00	
Columbus	0	0.00	3.14	0.00	18.38	0.00	36.91	0.00	41.57	0.00	0.00	0.00	0.00	0.00	0.00	
Dalton	0	0.00	2.15	0.00	9.35	0.00	49.68	0.00	38.82	0.00	0.00	0.00	0.00	0.00	0.00	
Macon	0	0.00	7.75	0.00	19.88	0.00	30.60	0.00	41.77	0.00	0.00	0.00	0.00	0.00	0.00	
Non-MSA	1	14.29	0.00	0.00	3.81	0.00	58.03	100.00	38.16	0.00	0.00	0.00	0.00	0.00	0.00	
Savannah	2	28.57	4.70	0.00	17.53	0.00	38.37	0.00	39.39	100.00	0.00	0.00	0.00	0.00	0.00	
Valdosta	3	42.86	3.79	0.00	18.66	0.00	27.71	66.67	49.84	33.33	0.00	0.00	0.00	0.00	0.00	
Warner-Robins	0	0.00	3.95	0.00	22.10	0.00	40.21	0.00	33.74	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Geographic Distribution: Home Mortgage Refinance		Geography: State Of Georgia						Evaluation Period: January 1, 2012 To December 31, 2013							
Assessment Area:	Total Home Mortgage Refinance 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	93	32.18	0.58	1.08	63.57	69.89	35.85	29.03	0.00	0.00	0.28	0.00	0.34	0.18	0.00
<b>Limited Review:</b>															
Athens	3	1.04	0.00	0.00	0.00	0.00	7.36	33.33	92.64	66.67	0.00	0.00	0.00	0.00	0.00
Brunswick	21	7.27	0.00	0.00	15.72	14.29	50.29	61.90	33.99	23.81	0.31	0.00	0.00	0.58	0.17
Columbus	12	4.15	3.14	8.33	18.38	8.33	36.91	25.00	41.57	58.33	0.14	0.00	0.00	0.00	0.23
Dalton	5	1.73	2.15	0.00	9.35	0.00	49.68	40.00	38.82	60.00	0.00	0.00	0.00	0.00	0.00
Macon	49	16.96	7.75	8.16	19.88	12.24	30.60	26.53	41.77	53.06	0.89	2.00	0.00	0.58	1.11
Non-MSA	55	19.03	0.00	0.00	3.81	0.00	58.03	54.55	38.16	45.45	0.42	0.00	0.00	0.25	0.61
Savannah	25	8.65	4.70	0.00	17.53	4.00	38.37	40.00	39.39	56.00	0.12	0.00	0.14	0.19	0.08
Valdosta	9	3.11	3.79	11.11	18.66	22.22	27.71	33.33	49.84	33.33	0.08	0.00	0.00	0.35	0.00
Warner-Robins	17	5.88	3.95	11.76	22.10	0.00	40.21	47.06	33.74	41.18	0.18	0.00	0.00	0.23	0.19

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)



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

Geographic Distribution: Multifamily		Geography: State Of Georgia						Evaluation Period: January 1, 2012 To December 31, 2013							
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta	0	0.00	10.35	0.00	74.22	0.00	15.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Athens	0	0.00	0.00	0.00	0.00	0.00	10.28	0.00	89.72	0.00	0.00	0.00	0.00	0.00	0.00
Brunswick	1	100.00	0.00	0.00	33.74	100.00	21.56	0.00	44.70	0.00	0.00	0.00	0.00	0.00	0.00
Columbus	0	0.00	24.33	0.00	21.41	0.00	20.70	0.00	33.55	0.00	0.00	0.00	0.00	0.00	0.00
Dalton	0	0.00	9.00	0.00	43.35	0.00	19.60	0.00	28.05	0.00	0.00	0.00	0.00	0.00	0.00
Macon	0	0.00	7.96	0.00	13.31	0.00	35.92	0.00	42.81	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA	0	0.00	0.00	0.00	7.02	0.00	72.68	0.00	20.31	0.00	0.00	0.00	0.00	0.00	0.00
Savannah	0	0.00	10.34	0.00	29.10	0.00	35.27	0.00	25.29	0.00	0.00	0.00	0.00	0.00	0.00
Valdosta	0	0.00	12.98	0.00	55.65	0.00	6.55	0.00	24.82	0.00	0.00	0.00	0.00	0.00	0.00
Warner-Robins	0	0.00	12.25	0.00	48.03	0.00	27.67	0.00	12.05	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

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

Geographic Distribution: Small Loans To Businesses												Geography: State Of Georgia				Evaluation Period: January 1, 2012 To December 31, 2013				
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp			
<b>Full Review:</b>																				
GA-Atlanta-Sandy Springs-Marietta	30	49.18	1.58	0.00	65.82	56.67	32.60	43.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
<b>Limited Review:</b>																				
GA-Athens-Clarke County	0	0.00	0.00	0.00	0.00	0.00	5.61	0.00	94.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
GA-Brunswick-Glynn	1	1.64	0.00	0.00	31.23	0.00	33.21	100.00	35.56	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
GA-Columbus-Muscogee	3	4.92	8.52	0.00	22.80	0.00	33.08	0.00	35.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
GA-Dalton-Whitfield Co	0	0.00	4.68	0.00	25.83	0.00	39.17	33.33	30.32	66.67	0.00	0.00	0.00	0.00	0.00	0.00				
GA-Macon-Bibb	14	22.95	9.78	7.14	20.38	21.43	29.83	35.71	40.01	35.71	0.00	0.00	0.00	0.00	0.00	0.00				
GA-Non-MSA	7	13.11	0.00	0.00	5.04	0.00	55.95	57.14	39.01	42.86	0.00	0.00	0.00	0.00	0.00	0.00				
GA-Savannah-Chatham Co-Effingham Co	3	4.92	6.32	0.00	21.40	0.00	37.09	66.67	34.95	33.33	0.00	0.00	0.00	0.00	0.00	0.00				
GA-Valdosta-Lowndes	1	1.64	4.87	100.00	35.28	0.00	16.74	0.00	43.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
GA-Warner-Robins-Houston	1	1.64	6.06	0.00	34.05	0.00	34.44	0.00	25.45	100.00	0.00	0.00	0.00	0.00	0.00	0.00				

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

\*\*\* Source Data - Dun and Bradstreet (2012).

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

Borrower Distribution: Home Purchase			Geography: State Of Georgia						Evaluation Period: January 1, 2012 To December 31, 2013						
Assessment Area:	Total Home Purchase 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>4</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	9	17.31	30.68	11.11	22.08	22.22	20.70	11.11	26.54	55.56	0.14	0.23	0.21	0.00	0.00
<b>Limited Review:</b>															
Athens	1	1.92	12.51	0.00	10.74	0.00	16.34	0.00	60.41	0.00	0.00	0.00	0.00	0.00	0.00
Brunswick	2	3.85	22.81	0.00	14.96	0.00	19.88	0.00	42.35	100.00	0.17	0.00	0.00	0.00	0.34
Columbus	2	3.85	22.97	50.00	17.21	0.00	18.63	0.00	41.19	50.00	0.00	0.00	0.00	0.00	0.00
Dalton	1	1.92	22.47	0.00	16.21	0.00	20.03	0.00	41.29	100.00	0.14	0.00	0.00	0.00	0.54
Macon	11	21.15	27.21	10.00	14.84	10.00	17.79	20.00	40.16	60.00	0.57	0.00	0.00	0.00	1.49
Non-MSA	7	13.46	18.99	0.00	14.50	0.00	18.27	28.57	48.24	71.43	0.24	0.00	0.00	0.21	0.38
Savannah	8	15.38	22.09	12.50	17.53	12.50	19.85	37.50	40.53	37.50	0.02	0.00	0.00	0.00	0.05
Valdosta	4	7.69	22.06	0.00	18.03	50.00	17.88	0.00	42.03	50.00	0.00	0.00	0.00	0.00	0.00
Warner-Robins	7	13.46	21.44	0.00	17.95	0.00	21.17	14.29	39.44	85.71	0.24	0.00	0.00	0.17	0.77

\* Based on 2012 Peer Mortgage Data (USPR)

\*\* 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 Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.8% of loans originated and purchased by bank.

4 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: Home Improvement			Geography: State Of Georgia						Evaluation Period: January 1, 2012 To December 31, 2013						
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>5</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta	0	0.00	30.68	0.00	22.08	0.00	20.70	0.00	26.54	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Athens	0	0.00	12.51	0.00	10.74	0.00	16.34	0.00	60.41	0.00	0.00	0.00	0.00	0.00	0.00
Brunswick	1	14.29	22.81	0.00	14.96	0.00	19.88	0.00	42.35	100.00	1.01	0.00	0.00	0.00	2.63
Columbus	0	0.00	22.97	0.00	17.21	0.00	18.63	0.00	41.19	0.00	0.00	0.00	0.00	0.00	0.00
Dalton	0	0.00	22.47	0.00	16.21	0.00	20.03	0.00	41.29	0.00	0.00	0.00	0.00	0.00	0.00
Macon	0	0.00	27.21	0.00	14.84	0.00	17.79	0.00	40.16	0.00	0.00	0.00	0.00	0.00	0.00
Non-MSA	1	14.29	18.99	0.00	14.50	0.00	18.27	0.00	48.24	100.00	0.00	0.00	0.00	0.00	0.00
Savannah	2	28.57	22.09	0.00	17.53	0.00	19.85	50.00	40.53	50.00	0.00	0.00	0.00	0.00	0.00
Valdosta	3	42.86	22.06	0.00	18.03	0.00	17.88	0.00	42.03	100.00	0.00	0.00	0.00	0.00	0.00
Warner-Robins	0	0.00	21.44	0.00	17.95	0.00	21.17	0.00	39.44	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

<sup>5</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: Home Mortgage Refinance			Geography: State Of Georgia						Evaluation Period: January 1, 2012 To December 31, 2013						
Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>6</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta	93	32.18	30.68	28.74	22.08	20.69	20.70	19.54	26.54	31.03	0.35	0.60	0.19	0.34	0.35
<b>Limited Review:</b>															
Athens	3	1.04	12.51	0.00	10.74	33.33	16.34	0.00	60.41	66.67	0.00	0.00	0.00	0.00	0.00
Brunswick	21	7.27	22.81	10.00	14.96	25.00	19.88	20.00	42.35	45.00	0.39	0.00	0.43	0.61	0.36
Columbus	12	4.15	22.97	0.00	17.21	9.09	18.63	36.36	41.19	54.55	0.21	0.00	0.35	0.44	0.13
Dalton	5	1.73	22.47	0.00	16.21	0.00	20.03	0.00	41.29	100.00	0.00	0.00	0.00	0.00	0.00
Macon	49	16.96	27.21	5.71	14.84	17.14	17.79	14.29	40.16	62.86	0.91	0.00	1.65	0.45	1.02
Non-MSA	55	19.03	18.99	13.04	14.50	15.22	18.27	13.04	48.24	58.70	0.39	0.00	0.30	0.36	0.43
Savannah	25	8.65	22.09	4.55	17.53	9.09	19.85	18.18	40.53	68.18	0.15	0.31	0.16	0.17	0.13
Valdosta	9	3.11	22.06	20.00	18.03	40.00	17.88	20.00	42.03	20.00	0.12	0.95	0.00	0.00	0.10
Warner Robins	17	5.88	21.44	10.00	17.95	30.00	21.17	30.00	39.44	30.00	0.24	0.47	0.45	0.43	0.00

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 16.6% of loans originated and purchased by bank.

<sup>6</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: Small Loans To Businesses		Geography: State Of Georgia			Evaluation Period: January 1, 2012 To December 31, 2013				
	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share *	
Assessment Area:	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
GA-Atlanta-Sandy Springs-Marietta	30	49.18	75.76	20.00	63.22	33.33	3.33	0.00	0.00
<b>Limited Review:</b>									
GA-Athens-Clarke County	0	0.00	74.01	0.00	0.00	0.00	0.00	0.00	0.00
GA-Brunswick-Glynn	1	1.64	72.93	100.00	100.00	0.00	0.00	0.00	0.00
GA-Columbus-Muscogee	3	4.92	70.33	33.33	66.67	33.33	0.00	0.00	0.00
GA-Dalton-Whitfield Co	0	0.00	69.06	0.00	0.00	0.00	0.00	0.00	0.00
GA-Macon-Bibb	14	22.95	69.42	50.00	42.86	35.71	21.43	0.00	0.00
GA-Non-MSA	7	13.11	74.84	71.43	71.43	14.29	14.29	0.00	0.00
GA-Savannah-Chatham Co-Effingham Co	3	4.92	71.59	33.33	66.67	33.33	0.00	0.00	0.00
GA-Valdosta-Lowndes	1	1.64	72.24	100.00	100.00	0.00	0.00	0.00	0.00
GA-Warner Robins-Houston	1	1.64	71.69	100.00	100.00	0.00	0.00	0.00	0.00

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2012).

\*\*\*\* 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 0.00% of small loans to businesses originated and purchased by the bank.

**Table 14. Qualified Investments**

Qualified Investments		Geography: State Of Georgia				Evaluation Period: January 22, 2011 To May 5, 2014			
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	0	0	2	392	2	392	16.82	0	0
<b>Limited Review:</b>									
Athens	0	0	0	0	0	0	0.00	0	0
Brunswick	0	0	1	102	1	102	4.38	0	0
Columbus	0	0	1	134	1	134	5.75	0	0
Dalton	0	0	0	0	0	0	0.00	0	0
Macon	0	0	2	1,142	1	1,142	49.01	0	0
Non-MSA	0	0	0	0	0	0	0.00	0	0
Savannah	0	0	3	247	3	247	10.60	0	0
Valdosta	0	0	0	0	0	0	0.00	0	0
Warner Robins	0	0	2	313	2	313	13.44	0	0

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

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

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

Distribution Of Branch Delivery System And Branch Openings/Closings				Geography: Georgia				Evaluation Period: January 22, 2011 To May 5, 2014									
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	26.37	3	14.29	0.00	100.00	0.00	0.00	0	0	0	0	0	0	1.93	65.40	32.67	0.00
<b>Limited Review:</b>																	
Athens	3.50	1	4.76	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	7.67	92.33
Brunswick	3.46	1	4.76	0.00	100.00	0.00	0.00	0	1	0	0	-1	0	0.00	29.99	38.92	31.08
Columbus	9.72	1	4.76	0.00	0.00	0.00	100.00	0	0	0	0	0	0	10.68	21.15	34.18	33.03
Dalton	2.96	1	4.76	0.00	0.00	0.00	100.00	0	0	0	0	0	0	4.14	15.37	47.88	32.61
Macon	17.78	4	19.05	0.00	0.00	50.00	50.00	1	3	0	-1	0	-1	15.75	20.51	26.21	37.53
Non MSA	24.91	5	23.81	0.00	0.00	60.00	40.00	0	0	0	0	0	0	0.00	4.48	60.40	35.12
Savannah	5.08	2	9.52	0.00	0.00	100.00	0.00	0	0	0	0	0	0	8.58	22.86	36.60	31.95
Valdosta	0.39	1	4.76	100.00	0.00	0.00	0.00	0	1	-1	0	0	0	5.43	32.68	21.99	39.90
Warner-Robins	5.83	1	4.76	0.00	100.00	0.00	0.00	0	1	0	0	0	-1	6.88	26.27	36.30	30.55



**Distribution of Branch and ATM Delivery System**

Distribution Of Branch And ATM Delivery System				Geography: Georgia				Evaluation Period: January 22, 2011 To May 5, 2014									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				# of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Atlanta	25.47	3	14.29	0	100.00	0	0	3	14.29	0	3	0	0	1.93	65.40	32.67	0.00
<b>Limited Review:</b>																	
Athens	3.38	1	4.76	0	0	0	100.00	1	4.76	0	0	0	1	0.00	0.00	7.67	92.33
Brunswick	3.34	1	4.76	0	100.00	0	0	1	4.76	0	1	0	0	0.00	29.99	38.92	31.08
Columbus	9.39	1	4.76	0	0	0	100.00	1	4.76	0	0	0	1	10.68	21.15	34.18	33.03
Dalton	2.86	1	4.76	0	0	0	100.00	1	4.76	0	0	0	1	4.14	15.37	47.88	32.61
Macon	17.18	4	19.05	0	0	50.00	50.00	4	19.05	0	0	2	2	15.75	20.51	26.21	37.53
Non MSA GA	24.07	5	23.81	0	0	60.00	40.00	5	23.81	0	0	3	2	0.00	4.48	60.40	35.12
Savannah	4.91	2	9.52	0	0	100.00	0	2	9.52	0	0	2	0	8.58	22.86	36.60	31.95
Valdosta	0.38	1	4.76	100.00	0	0	0	1	4.76	1	0	0	0	5.43	32.68	21.99	39.90
Warner-Robins	5.64	1	4.76	0	100.00	0	0	1	4.76	0	1	0	0	6.88	26.27	36.30	30.55

**Table 1. Lending Volume**

Lending Volume		Geography: North Carolina						Evaluation Period: January 1, 2012 To December 31, 2013				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
<b>Full Review:</b>												
Charlotte	91.98	436	96,105	1	420	0	0	3	1,536	40	98,061	96.90
<b>Limited Review:</b>												
Hickory	8.02	38	5,577	0	0	0	0	0	0	38	5,577	3.10

\* Loan Data as of December 31 2013. Rated area refers to either the state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is January 1 2012 to December 31 2013.

\*\*\* Deposit Data as of June 30 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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

Geographic Distribution: HOME PURCHASE			Geography: North Carolina								Evaluation Period: January 1 2012 to December 31 2013				
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>															
Charlotte	212	96.80	5.20	2.36	18.04	12.74	24.79	20.28	51.98	64.62	0.01	0.00	0.00	0.00	0.01
<b>Limited Review:</b>															
Hickory	7	3.20	0.00	0.00	29.42	14.29	60.30	71.43	10.28	14.29	0.00	0.00	0.00	0.00	0.00

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

Geographic Distribution: HOME IMPROVEMENT			Geography: North Carolina								Evaluation Period: January 1 2012 to December 31 2013				
MA/Assessment Area:	Total Home Improvement 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>															
Charlotte	24	75.00	5.20	0.00	18.04	8.33	24.79	4.17	51.98	87.50	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Hickory	8	25.00	0.00	0.00	29.42	25.00	60.30	75.00	10.28	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2012 Peer Mortgage Data (USPR)

\*\* 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 2010 Census information.

\*\*\*\*Data shown includes only One to Four – Family and manufactured housing. (Property type of 1 or 2)

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only one to four – family and manufactured housing. (Property type 1 or 2)

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

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: North Carolina								Evaluation Period: January 1 2012 to December 31 2013				
MA/Assessment Area:	Total Home Mortgage Refinance 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>															
Charlotte	197	89.95	5.20	1.02	18.04	6.60	24.79	11.17	51.98	81.22	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Hickory	22	10.05	0.00	0.00	29.42	50.00	60.30	31.82	10.28	18.18	0.00	0.00	0.00	0.00	0.00

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

Geographic Distribution: MULTIFAMILY			Geography: North Carolina								Evaluation Period: January 1 2012 to December 31 2013				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charlotte	1	50.00	16.80	100.00	28.06	0.00	19.02	0.00	36.11	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Hickory	1	50.00	0.00	0.00	49.23	100.00	44.35	0.00	6.42	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four – family and manufactured housing. (Property type 1 or 2)

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: North Carolina				Evaluation Period: January 1 2012 to December 31 2013					Market Share (%) by Geography*				
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies							
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Charlotte	1	100.00	9.41	100.00	16.88	0.00	22.10	0.00	49.98	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Hickory	0	0.00	0.00	0.00	35.72	0.00	53.28	0.00	11.00	0.00	0.00	0.00	0.00	0.00	0.00	

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

Borrower Distribution: HOME PURCHASE			Geography: North Carolina				Evaluation Period: January 1 2012 to December 31 2013					Market Share*				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total*	% Families***	% BANK Loans***	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Charlotte	214	96.83	20.80	7.01	16.63	20.56	19.50	17.76	43.07	54.67	0.01	0.00	0.00	0.00	0.02	
<b>Limited Review:</b>																
Hickory	7	3.17	23.85	20.00	18.91	20.00	20.31	0.00	36.93	60.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2012 Peer Small Business Data: US.

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

\*\*\* Source Data - Dun and Bradstreet 2012.

\* Based on 2012 Peer Mortgage Data (USPR)

\*\* 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 Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.9% of loans originated and purchased by Bank.

“ Data shown includes only One to Four – Family and Manufactured housing. (Property type 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: North Carolina						Evaluation Period: January 1 2012 to December 31 2013						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charlotte	24	75.00	20.80	0.00	16.63	0.00	19.50	12.50	43.07	87.50	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Hickory	8	25.00	23.85	0.00	18.91	42.86	20.31	28.57	36.93	28.57	0.00	0.00	0.00	0.00	0.00

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: North Carolina						Evaluation Period: January 1 2012 to December 31 2013						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charlotte	197	89.95	20.80	1.02	16.63	10.15	19.50	20.81	43.07	68.02	0.00	0.00	0.00	0.00	0.01
<b>Limited Review:</b>															

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated and purchased by Bank.

“ Data shown includes only one to four – family and manufactured housing. (Property Type 1 or 2)

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.1% of loans originated and purchased by Bank.

Hickory	22	10.05	23.85	0.00	18.91	15.38	20.31	23.08	36.93	61.54	0.00	0.00	0.00	0.00	0.00
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**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: North Carolina			Evaluation Period: January 1 2012 to December 31 2013			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less	
<b>Full Review:</b>										
Charlotte	1	100.00	70.93	100.00	0.00	0.00	100.00	0.00	0.00	
<b>Limited Review:</b>										
Hickory	0	0.00	72.96	0.00	0.00	0.00	0.00	0.00	0.00	

Institution ID: 2497

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: North Carolina				Evaluation Period: January 1 2012 to December 31 2013			
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>									
Charlotte	0	0	12	2,000	12	2,000	100.00	0	0
<b>Limited Review:</b>									
Hickory	0	0	0	0	0	0	0.00	0	0

\* Based on 2012 Peer Small Business Data: US.

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2012).

\*\*\*\* 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 [Percentage] of small loans to businesses originated and purchased by the Bank.

\* '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.

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

Distribution Of Branch Delivery System And Branch Openings/Closings				Geography: North Carolina				Evaluation Period: January 1 2012 To December 31 2013									
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>																	
Charlotte	96.90	1	25.00	0	0	0	100.00	1	0	0	0	0	+1	9.41	16.88	22.10	49.98
<b>Limited Review:</b>																	
Hickory	3.10	3	75.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	32.48	57.77	9.75

**Table 16: Distribution of Branch and ATM Delivery System**

Distribution Of Branch And ATM Delivery System				Geography: North Carolina				Evaluation Period: January 22, 2011 To May 5, 2014									
MA/Assessment Area:	Deposits	Branches						ATMs				Population					
	% of Total Bank Deposits	# of Bank Branches	% of Total Bank Branches	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Total Bank ATMs	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
<b>Full Review:</b>																	
Charlotte	96.90	1	33.33	0	0	0	100.00	3	60.00	0	1	0	2	10.72	22.75	23.62	42.87
<b>Limited Review:</b>																	
Hickory	3.10	2	66.67	0	0	100.00	0	2	40.00	0	0	2	0	0.00	32.48	57.77	9.75



**Table 1. Lending Volume**

Lending Volume		Geography: South Carolina						Evaluation Period: January 1, 2012 To December 31, 2013				
Assessment Area (2012):	% 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>												
Greenville	76.44	493	95,444	22	4,975	0	0	1	1,460	516	101,879	81.50
<b>Limited Review:</b>												
Anderson	7.86	48	8,192	4	480	0	0	1	300	53	8,972	5.85
Spartanburg	15.70	95	15,559	11	3,222	0	0	0	0	106	18,871	12.65

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

Geographic Distribution: Home Purchase		Geography: South Carolina						Evaluation Period: January 1, 2012 To December 31, 2013							
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>															
Greenville	324	79.22	3.37	0.62	14.95	7.41	47.78	36.11	33.91	55.86	0.72	0.00	0.48	0.69	0.81
<b>Limited Review:</b>															
Anderson	27	6.60	2.08	0.00	19.37	0.00	47.91	66.67	30.64	33.33	0.19	0.00	0.00	0.34	0.10
Spartanburg	58	14.18	1.73	0.00	17.16	12.07	53.25	55.17	27.86	32.76	0.18	0.00	0.00	0.27	0.08

\* Loan Data as of December 31, 2013. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from January 01, 2012 to December 31, 2013.

\*\*\* Deposit Data as of June 30 2013. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Geographic Distribution: Home Improvement			Geography: South Carolina								Evaluation Period: January 1, 2012 To December 31, 2013				
Assessment Area:	Total Home Improvement 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>															
Greenville	5	62.50	3.37	0.00	14.95	20.00	47.78	20.00	33.91	60.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Anderson	0	0.00	2.08	0.00	19.37	0.00	47.91	0.00	30.64	0.00	0.00	0.00	0.00	0.00	0.00
Spartanburg	3	37.50	1.73	0.00	17.16	66.67	53.25	0.00	27.86	33.33	0.00	0.00	0.00	0.00	0.00

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Geographic Distribution: Home Mortgage Refinance			Geography: South Carolina						Evaluation Period: January 1, 2012 To December 31, 2013						
Assessment Area:	Total Home Mortgage Refinance 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>															
Greenville	162	74.65	3.37	1.23	14.95	7.41	47.78	28.40	33.91	62.96	0.47	0.63	0.73	0.35	0.51
<b>Limited Review:</b>															
Anderson	21	9.68	2.08	4.76	19.37	0.00	47.91	61.90	30.64	33.33	0.30	0.00	0.00	0.39	0.30
Spartanburg	34	15.67	1.73	0.00	17.16	8.82	53.25	35.29	27.86	55.88	0.25	0.00	0.21	0.16	0.38

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Geographic Distribution: Multifamily		Geography: South Carolina					Evaluation Period: January 1, 2012 To December 31, 2013					Market Share (%) by Geography*				
Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Overall	Low	Mod	Mid	Upp	
	#	% of Total**	% of MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans						
<b>Full Review:</b>																
Greenville	2	100.00	6.21	50.00	28.24	0.00	34.49	50.00	31.05	0.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Anderson	0	0.00	7.03	0.00	10.60	0.00	43.82	0.00	38.55	0.00	0.00	0.00	0.00	0.00	0.00	
Spartanburg	0	0.00	7.61	0.00	34.11	0.00	36.08	0.00	22.20	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

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

Geographic Distribution: Small Loans To Businesses			Geography: South Carolina						Evaluation Period: January 1, 2012 To December 31, 2013						
Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greenville	24	61.54	5.04	4.17	17.95	16.67	38.84	25.00	38.17	54.17	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Anderson	4	10.26	4.69	25.00	18.00	0.00	43.37	75.00	33.94	0.00	0.00	0.00	0.00	0.00	0.00
Spartanburg	11	28.21	2.57	9.09	21.96	36.36	45.59	18.18	29.88	36.36	0.00	0.00	0.00	0.00	0.00

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

Borrower Distribution: Home Purchase			Geography: South Carolina						Evaluation Period: January 1, 2012 To December 31, 2013						
Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families <sup>7</sup>	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greenville	324	79.22	21.03	5.92	17.20	23.05	19.11	21.81	42.67	49.22	0.80	0.49	0.90	0.72	0.86
<b>Limited Review:</b>															
Anderson	27	6.60	23.50	11.11	15.45	14.81	21.02	33.33	40.04	40.74	0.21	0.00	0.00	0.43	0.29
Spartanburg	58	14.18	21.54	12.50	17.69	23.21	20.36	28.57	40.41	35.71	0.21	0.00	0.17	0.00	0.54

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

\*\*\* Source Data - Dun and Bradstreet (2012).

\* Based on 2012 Peer Mortgage Data (USPR)

\*\* 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 Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.2% of loans originated and purchased by bank.

<sup>7</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: Home Improvement			Geography: South Carolina				Evaluation Period: January 1, 2012 To December 31, 2013					Market Share <sup>*</sup>				
Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Overall	Low	Mod	Mid	Upp	
	#	% of Total <sup>**</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>8</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>	% Families <sup>***</sup>	% BANK Loans <sup>****</sup>						
<b>Full Review:</b>																
Greenville	5	62.50	21.03	0.00	17.20	20.00	19.11	40.00	42.67	40.00	0.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>																
Anderson	0	0.00	23.50	0.00	15.45	0.00	21.02	0.00	40.04	0.00	0.00	0.00	0.00	0.00	0.00	
Spartanburg	3	37.50	21.54	0.00	17.69	0.00	20.36	33.33	40.41	66.67	0.00	0.00	0.00	0.00	0.00	

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

8 Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: Home Mortgage Refinance		Geography: South Carolina						Evaluation Period: January 1, 2012 To December 31, 2013							
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>9</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>															
Greenville	162	74.65	21.03	3.97	17.20	6.62	19.11	17.22	42.67	72.19	0.50	0.54	0.11	0.23	0.68
<b>Limited Review:</b>															
Anderson	21	9.68	23.50	10.00	15.45	0.00	21.02	25.00	40.04	65.00	0.35	0.49	0.00	0.40	0.42
Spartanburg	34	15.67	21.54	3.03	17.69	9.09	20.36	27.27	40.41	60.61	0.30	0.00	0.00	0.19	0.52

\* Based on 2012 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families is based on the 2010 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 6.0% of loans originated and purchased by bank.

<sup>9</sup> Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: Small Loans To Businesses		Geography: South Carolina			Evaluation Period: January 22, 2011 To May 5, 2014				
Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share *	
	#	% of Total**	% of Businesses ***	% BANK Loans ****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Greenville	24	61.54	69.02	70.83	45.83	20.83	33.33	0.00	0.00
<b>Limited Review:</b>									
Anderson	4	10.26	69.55	100.00	25.00	75.00	0.00	0.00	0.00
Spartanburg	11	28.21	67.56	27.27	27.27	27.27	45.45	0.00	0.00

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2012).

\*\*\*\* 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 0.00% of small loans to businesses originated and purchased by the bank.



**Table 14. Qualified Investments**

Qualified Investments		Geography: South Carolina				Evaluation Period: January 22, 2011 To May 5, 2014			
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>									
Greenville	0	0	1	774	1	774	26.56	0	0
<b>Limited Review:</b>									
Anderson	0	0	0	0	0	0	0.00	0	0
Spartanburg	0	0	4	615	4	515	14.21	0	0
Statewide	0	0	3	1,726	3	1,726	59.23	0	0

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

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

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

Distribution Of Branch Delivery System And Branch Openings/Closings				Geography: South Carolina				Evaluation Period: January 22, 2011 To May 5, 2014									
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>																	
Greenville	81.50	6	75.00	0.00	0.00	16.67	83.33	2	0	0	0	0	+2	5.47	18.31	44.26	31.95
<b>Limited Review:</b>																	
Anderson	5.85	1	12.50	0.00	0.00	0.00	100.00	0	0	0	0	0	0	4.05	20.64	46.06	29.25
Spartanburg	12.65	1	12.50	0.00	0.00	0.00	100.00	0	0	0	0	0	0	4.27	22.00	49.39	24.34

